

State Strategies for Effective Consultation

Objective

The objective of this activity is to ensure that current and potential State partners have an opportunity to achieve effective consultation on the State’s planned use of funds under its Consolidated Plan, given the geographic challenges and economic diversity presented in many states.

Summary

State consultation requirements are summarized on the chart below:

	Consultation Partners	Citation
Consolidated Plan; Annual Action Plan	Public and private agencies that provide: <ul style="list-style-type: none"> • assisted housing (including any state public housing agency) • health services • social and fair housing services (including agencies focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons) 	24 CFR 91.110(a); 91.300(b); 91.320(b)
Homeless Strategy	Each Continuum of Care within the state; Public and private agencies that provide: <ul style="list-style-type: none"> • assisted housing • health services • social services Publicly-funded institutions and systems that may discharge persons into homelessness, including: <ul style="list-style-type: none"> • health-care facilities • mental health facilities • foster care and other youth facilities • corrections programs and institutions • Business and civic leaders 	24 CFR 91.110(b); 91.110(e); 91.305(a); 91.320(k)(3)(v)
Lead Paint Hazards	State or local health and child welfare agencies	24 CFR 91.110(c)
CDBG Method of Distribution*	Local governments in non-entitlement areas of the state	24 CFR 91.110; 91.320(k)(1)(i); 91.325(b)

Application to Con Plan

As noted above, the Consolidated Plan regulations specify the consultation requirements for the Con Plan and the Annual Action Plan. The eCon Planning Suite helps grantees organize the

* Note: Unlike CDBG entitlement grantees, the States do not implement CDBG activities directly; they make grants to units of general local government (UGLGs), according to requirements described in a Method of Distribution. As a result, they do not list planned activities for CDBG in their Annual Action Plan. Instead, the States are required to consult with non-entitlement units of general local government (UGLGs)—their potential sub-grantees—regarding the methods they will use to distribute funds.

required consultation components of the plan and in addition can help State grantees identify their full range of stakeholder groups. For States, these include:

- Narrative field addressing the consultation process in the executive summary (screen ES-05)
- Provision of a consultation narrative and a template for developing a roster of consultation partners linked to IDIS (PR-10)
- Provision of narrative fields for grantees to record the role of consultation in the determination of housing needs (NA-10), homeless needs (NA-40), and non-housing community development needs (NA-50)
- Narrative fields to record the role of consultation in identification of target areas (SP-10) and priority needs (SP-25) in the strategic plan
- Quality checks to help grantees ensure that consultation elements are fully addressed in the Consolidated Plan

In addition, CPD Maps supports the engagement of consultation partners statewide through the creation of thematic maps that display housing and economic conditions throughout the State. By mapping conditions at the county level, states can communicate the diversity of needs and opportunities across a varied statewide geography. Specific themed maps can engage groups of stakeholders by identifying regional differences in such areas as:

- Housing conditions
- Change in employment in various occupational areas (tract-level only)
- Change in local housing costs (tract-level only)
- Housing affordability

Target Audience/Usage

States will engage many of the same target audiences as local jurisdictions; recent revisions to Part 91 expand the State's required consultation partners to include the Continuum of Care throughout the State, institutions discharging persons into homelessness, and business and civic leaders.

In addition, the non-entitlement UGLGs comprise a primary target audience. Strategies should engage this audience to ensure (a) that the State understands local needs and (b) the State's potential subrecipients understand its policy and program priorities.

Logistics and Materials Needed

Many of the strategies that apply to entitlements may be used by States to overcome geographic barriers, including web-based publications, social media strategies, online forums, etc. In particular, states should consider:

- Geographic outreach through regional consultations. Communities at some distance from the state capital will often "turn out in force" for a local consultation to provide input on the subject of the action plan in relationship to local issues. They especially appreciate a physical presence of local officials focused on their local needs.
- Theme-based consultation around local issues. Depending on the local economy, challenges and needs vary in different parts of the state. Various areas may be dependent on manufacturing, natural resource management, tourism, or agriculture. Each type of economy creates different challenges for low and moderate-income households, and each type presents a range of opportunities for growth.

- Inclusion of consultation partners across various business sectors. While consultation with local governments on the method of distribution is required, local consultations may also include a range of stakeholders, including representatives of business, lending, human services, philanthropy, etc., as appropriate. Statewide trade associations (e.g., lenders, cities, planners, social service agencies, etc.) are often effective representatives for stakeholders that reflect the diversity within these groups throughout the State.

Examples of Effective UGLG Consultation

- [Maine Public Forums on Housing and Community Development Needs](#): Maine Housing and the Maine Office of Community Development jointly conduct four regional public hearings in support of the development of its Annual Action Plan. The hearings are designed to gather information and ideas from interested parties about housing and community development needs throughout the State, identify impediments to fair housing in the State, and to review potential program changes. In addition to the public forums, the CDBG program has a separate and final public hearing where comments are received and then responded to before enacting the final plan.
- Indiana Regional “Listening Sessions”: The Indiana Office of Community and Rural Affairs (OCRA) conducted eight regional “listening sessions” for local elected officials to discuss their housing and community development needs. OCRA also met with Regional Planning Commissions and the Indiana Housing and Community Development Authority met with housing groups. These meetings were held prior to the development of the State’s draft method of distribution (MOD). Then the State held [two video conference/webinar public hearings](#) on the draft MOD which could be accessed at six regional locations.