

SPECIAL MEETING AGENDA

In accordance with Governor Lamont's Executive Order 7B and social distancing guidelines recommended by the CDC to slow community spread of COVID-19, this meeting is physically closed to the public. The public may view the meeting live at <https://mansfieldct.gov/video> or on Charter Spectrum Cable Channel 191 (the website is recommended as it is a higher image clarity).

Public Comment will be accepted by email at TownMngr@mansfieldct.org or by USPS mail at 4 South Eagleville Road, Mansfield CT 06268 and must be received prior to the meeting (public comment received after the meeting will be shared at the next meeting). Additionally, public comment can be phoned in live. Please email TownMngr@mansfieldct.org or call 860-429-3336 ext. 5 by Noon on the day of the meeting to receive instructions for how to phone in public comment.

1. CALL TO ORDER

2. ROLL CALL

3. OPPORTUNITY FOR PUBLIC TO ADDRESS COUNCIL

4. OLD BUSINESS

A. Small Cities Program (Community Development Block Grant) (Item #4A, 05-11-20 Agenda)

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[AIS-Small Cities Program \(Community Development Block Grant\)](#)

[Resolution authorizing submission of Small Cities application in the amount of \\$900,000](#)

[Proposed 2020 Fair Housing Action Plan](#)

[2017 Fair Housing Action Plan](#)

[Citizen Participation Plan](#)

[Section 3 Plan](#)

[Residential Displacement and Relocation Assistance Plan](#)

[Compliance with Title VI of the Civil Rights Act of 1964 Policy Statement](#)

[Affirmative Action Policy Statement](#)

[Resolution Adopting a Policy Prohibiting the Excessive Use of Force Against](#)

[Any Individual Engaged in Non-Violent Civil Rights Demonstration](#)

[Relocation Policy](#)

5. ADJOURNMENT



**Town of Mansfield
Agenda Item Summary**

To: Town Council
From: John C. Carrington, Interim Town Manager 
CC: Linda Painter, Director of Planning and Development; Francis Raiola, Fire Chief; Jillene Woodmansee, Planning Specialist
Date: May 15, 2020
Re: Small Cities Program: Authorization to Apply for Small Cities Funding and adoption of required plans and policies

Subject Matter/Background

On May 11, 2020, the Town Council held a public hearing on a proposed Small Cities application to assist in funding the acquisition of a new hybrid aerial/pumper truck for Station 207 in the Four Corners area. One of the questions raised during the Council's discussion of this item was whether there would be any ramifications should the truck be relocated to a station in a census tract that does not meet the low-moderate income benefit criteria.

Per the Council's request, staff contacted Miguel Rivera, Housing and Community Development Manager for the Connecticut Department of Housing (DOH) to request assistance with determining eligibility of the application based on the Council's question. Staff explained that the Council was seeking guidance to ensure that we complied with the terms of the grant program given the potential for future station consolidation/relocation based on the results of the pending fire services study.

On May 13, 2020, Linda Painter, Director of Planning and Development; Fire Chief Raiola, and Jillene Woodmansee, Planning Specialist had a virtual meeting with Mr. Rivera. During this meeting, Chief Raiola explained the way in which the Town's fire services operate and provided additional information regarding the ongoing fire services study and the potential that said study may result in the existing Fire Station 207 being eventually closed. Mr. Rivera indicated that provided the station in which the proposed truck would be located was in a qualifying census tract at the time of application, acquisition of the truck (if the grant were to be awarded) and the date the truck was placed in service, the Town would be in compliance with grant requirements.

Staff also noted during the meeting that because both the original notice of Intent to DOH and the public hearing notices referenced an intent to apply for up to \$700,000, staff had advised the Council against applying for a larger amount of funding. Mr. Rivera indicated that neither the Notice of Intent nor the Public Hearing Notice listing an

amount of \$700,000 would preclude the Town from requesting a larger grant. Based on the estimated project cost (\$1,150,000), the \$250,000 reserved for a fire truck from the FY18 budget cycle would represent a local match of approximately 21.7%. Accordingly, staff has revised its recommendation with regard to proposed grant amount. If the Council supports the submission of a grant application for fire protection equipment, staff recommends that the Town request a grant of \$900,000, using the previously appropriated \$250,000 as the local contribution to the project.

If the Council supports the submission of the application, approval of several plans and policies are required as described herein. Additionally, the CT Department of Housing (DOH) requires Council support of the project through a resolution. A revised resolution is attached for your consideration.

Fair Housing Action Plan

In order to apply for and to receive funding under the Small Cities Community Development Block Grant (CDBG) Program and in accordance with its commitment to Fair Housing, the Town is required to update its Fair Housing Action Plan every three years. The previous plan was adopted by the Town Council on April 24, 2017. The following summarizes significant actions that the Town has taken pursuant to that Plan in support of fair housing in addition to its annual reaffirmation of support for Fair Housing through re-adoption of a Fair Housing Policy and resolution:

- Amended the Zoning Regulations to require all residential developments of five or more units to include affordable housing units. Ten percent of the units must be affordable to households at 80% of median income and five percent of the units must be affordable to households at 120% of median income.
- Reviewed the 2018 Housing Data Profile prepared by the Partnership for Strong Communities with the Planning and Zoning Commission and provided information related to how Mansfield compares demographically to surrounding communities, Tolland County and the state as part of activities related to Sustainable CT certification. This presentation also included an assessment of how our current housing stock addresses needs based on our demographics as well as the diversity and affordability of housing stock.
- Amended the Zoning Regulations to establish the South Eagleville Road Housing Opportunity Zone, which authorizes affordable housing developments that meet Sec. 8-30g, C.G.S. with site plan approval.
- Established the Ad Hoc Committee on Affordable and Workforce Housing to update the Town's affordable housing plan and consider the establishment of a Housing Trust Fund.
- Approved a Zoning Map amendment and site plan for Eagleville Green, a 42-unit mixed-income development in the South Eagleville Road Housing Opportunity Zone.
- Proposed amendments to Zoning Regulations for accessory dwelling units that would allow children under the age of 18 to live in an accessory dwelling unit with up to two adults to increase accessibility of these units to families. The

provisions include limits based on the size of the unit to prevent overcrowding. The public hearing on the proposed amendments is scheduled for June 1, 2020.

Staff has prepared an updated Fair Housing Action Plan for 2020-2023 based on the requirements established by CTDOH.

Citizen Participation Plan

Pursuant to DOH requirements, we have prepared a Citizen Participation Plan to guide efforts to obtain community input on community development needs and concerns as well as procedures on how to file comments or complaints.

Section 3 Plan

The U.S. Department of Housing and Urban Development (HUD) requires that grant recipients adopt a plan to demonstrate how they will comply with Section 3 of the Housing and Urban Development Act of 1968, as amended. The purpose of this plan is to provide, to the greatest extent feasible, economic opportunities for low- and very low-income persons in the form of training, employment, contracting and other economic opportunities arising in connection with the expenditure of housing assistance (including Section 8 assistance), and community development assistance.

Relocation Policy and Residential Anti-Displacement and Relocation Plan

The Town is required to adopt a relocation policy and residential anti-displacement and relocation plan to minimize displacement of residents associated with activities funded by HUD and to establish a plan to assist those that are displaced and require relocation.

Title VI of the Civil Rights Act of 1964

The Town is required to maintain its policy regarding Compliance with Title VI of the Civil Rights Act of 1964. Although the Town's policy has not been rescinded and remains in effect, staff recommends re-adoption to demonstrate the Town's continued commitment.

Affirmative Action Policy

The Town of Mansfield has had an Affirmative Action Policy since 1998. As part of this application process, we are asking the Council to reaffirm its commitment to affirmative action through adoption of an updated policy.

Policy Prohibiting the Excessive Use of Force

The Town is required to adopt and enforce a policy prohibiting the use of excessive force against any individuals engaged in non-violent civil rights demonstrations. This same policy was adopted by the Council on March 25, 2019.

Financial Impact

HUD provides Community Development Block Grant (CDBG) money to States, who distribute the resources to non-entitlement communities (population less than 50,000). As discussed earlier in this memo, the Town would contribute \$250,000 in capital funding previously reserved for replacement fire equipment in FY18 toward the

acquisition of the new fire truck. Additionally, increases in staffing costs are anticipated as further described in the Agenda Item Summary for the public hearing associated with this application. Lastly, the Town also anticipates incurring indirect costs in the form of staff time spent on administration of the grant.

Recommendation

To submit the application, which is due May 22, 2020, the following actions are needed:

Resolution Authorizing Application for Funding for Fire Protection Equipment
Move, effective May 15, 2020, to adopt the attached Resolution Authorizing the Submission of a Small Cities Community Development Block Grant Application in the amount of \$900,000 dollars for fire protection equipment. In adopting this Resolution, the Council also affirms the Town's commitment to the project by authorizing the Finance Director to submit a letter to the Department of Housing committing the \$250,000 of capital funds reserved for replacement fire equipment in the FY18 Capital Improvement Budget to this project.

Adoption of Required Plans

Move, effective May 15, 2020, to adopt the following plans as provided in the Town Council packet for the May 15, 2020 meeting:

- *2020 Fair Housing Action Plan for the Town of Mansfield;*
- *Community Development Block Grant (CDBG) Program Citizen Participation Plan;*
- *Section 3 Plan; and*
- *Residential Anti-Displacement and Relocation Assistance Plan.*

Adoption of Required Policies

Move, effective May 15, 2020, to adopt the following policies and resolutions as provided in the Town Council packet for the May 15, 2020 meeting:

- *Compliance with Title VI of the Civil Rights Act of 1964 Policy Statement;*
- *Affirmative Action Policy Statement;*
- *Resolution Adopting a Policy Prohibiting the Excessive Use of Force Against Any Individual Engaged in Non-Violent Civil Rights Demonstration; and*
- *Relocation Policy.*

Attachments

- 1) Resolution authorizing submission of Small Cities application in the amount of \$900,000
- 2) Proposed 2020 Fair Housing Action Plan
- 3) 2017 Fair Housing Action Plan
- 4) Citizen Participation Plan
- 5) Section 3 Plan
- 6) Residential Anti-Displacement and Relocation Assistance Plan
- 7) Compliance with Title VI of the Civil Rights Act of 1964 Policy Statement
- 8) Affirmative Action Policy Statement

- 9) Resolution Adopting a Policy Prohibiting the Excessive Use of Force Against Any Individual Engaged in Non-Violent Civil Rights Demonstration
- 10) Relocation Policy



TOWN OF MANSFIELD
RESOLUTION AUTHORIZING THE SUBMISSION OF A SMALL CITIES
COMMUNITY DEVELOPMENT BLOCK GRANT APPLICATION FOR FIRE
PROTECTION EQUIPMENT

- WHEREAS, Federal monies are available under the Title I of the Housing and Community Development Act of 1974, 42 U.S.C. § 5301, et. seq., as amended, also known as Public Law 93-383, and administered by the State of Connecticut, Department of Housing as the Connecticut Small Cities Community Development Block Grant Program; and
- WHEREAS, Pursuant to Chapter 127c, and Part VI of Chapter 130 of the Connecticut General Statutes, the Commissioner of the State of Connecticut Department of Housing is authorized to disburse such federal monies to local municipalities; and
- WHEREAS, The Town needs to update and improve fire protection equipment to better serve its residents; and
- WHEREAS, The Town of Mansfield conducted a public hearing to receive citizen comments on housing and community development needs; and
- WHEREAS, It is desirable and in the public interest that the Town of Mansfield make application to the State for \$900,000 in order to undertake a Small Cities Community Development program and to execute an Assistance Agreement therefore, should one be offered;

NOW, THEREFORE, BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF MANSFIELD:

That it is cognizant of the conditions and prerequisites for the State financial assistance imposed by Part VI of Chapter 130 of the Connecticut General Statutes; and,

That the filing of an application for State financial assistance by the Town of Mansfield in an amount not to exceed \$900,000 is hereby approved and that John Carrington, Interim Town Manager, is hereby authorized and directed to file such application with the Commissioner of the Department of Housing; to provide such additional information; to execute such other documents as may be required by the Commissioner; to execute an Assistance Agreement with the State of Connecticut for financial assistance if such an agreement is offered; to execute any amendments, rescissions, and revisions thereto; to implement project activities, if approved, and to act as the authorized representative of the Town of Mansfield and to execute any other agreement or contract relative to said project.

That it adopts or has adopted on behalf of the Town of Mansfield a policy to support the following nondiscrimination agreements and warranties provided in subsection (a)(1) of Connecticut General Statutes sections 4a-60 and 4a-60a, respectively, as amended by Public Act 07-142, and for which purposes the "contractor" is the Town of Mansfield and "contract" is said Assistance Agreement:

The contractor agrees and warrants that in the performance of the contract such contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation or physical disability, including but not limited to, blindness, unless it is shown by such contractor that such

disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut. The contractor further agrees to take affirmative action to insure that applicants with job-related qualifications are employed and that employees are treated when employed without regard to their race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation or physical disability, including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved.

The contractor agrees and warrants that in the performance of the contract, such contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of sexual orientation, in any manner prohibited by the laws of the United States or of the State of Connecticut, and that employees are treated when employed without regard to their sexual orientation.

Antonia Moran
Mayor

Dated at Mansfield, Connecticut
this 15th day of May, 2020

Attest: I, Sara-Ann Chaine, Town Clerk of the Town of Mansfield, do hereby certify that the above is a true and correct copy of a resolution adopted by the Mansfield Town Council at its duly called and held meeting on May 15, 2020, at which a quorum was present and acting throughout, and that the resolution has not been modified, rescinded, or revoked and is at present in full force and effect. I further certify that John Carrington now holds the office of Interim Town Manager and that he has held that office since July 19, 2019.

Date
(Seal)

Sara-Ann Chaine, Town Clerk

FAIR HOUSING ACTION PLAN

I. POLICY STATEMENT

It shall be the policy and commitment of the Town of Mansfield, Connecticut to ensure that fair and equal housing opportunities are granted to all persons, in all housing opportunities and development activities funded by the town, regardless of race, color, religion, sex, sexual orientation, gender identity or expression, marital status, lawful source of income, familial status, national origin, ancestry, age or mental or physical disability. This shall be done through a program of education, an analysis of impediments, and designation of a Fair Housing Officer and development of a procedure for complaints of discrimination. This plan will incorporate the directives of state and federal laws and executive orders, including, but not limited to:

- Title VI of the Civil Rights Act of 1964
- The Fair Housing Act – Title VIII of the Civil Rights Act of 1968, as amended
- Executive Order 11063, as amended by Executive Order 12259
- Section 104(b) of Title I of the Housing and Community Development Act of 1974, as amended
- Section 109 of Title I of the Housing and Community Development Act of 1974, as amended
- Section 3 of the Housing and Urban Development Act of 1968, as amended
- Sections 503 and 504 of the Rehabilitation Act of 1973, as amended
- The Americans with Disabilities Act of 1990
- The Age Discrimination Act of 1975, as amended
- Executive Order 11246 (as amended by Executive Orders 12375 and 12086)
- Equal Opportunity under HUD contracts and HUD-assisted Construction Contracts
- Executive Order 12892, Leadership and Coordination of Fair Housing
- Connecticut General Statutes 46a-64c as amended

The Town of Mansfield commits to providing and promoting racial and economic integration in any housing development financially supported with DOH funding and will take affirmative steps to reach beneficiaries from all racial and ethnic groups as well as the physically or mentally handicapped and families with children and to reach a broad range of income eligible beneficiaries for appropriate and applicable housing opportunities.

II. SELECTION OF FAIR HOUSING OFFICER

In accordance with Title VIII, Civil Rights Act of 1968, as amended, the Fair Housing Officer below has been designated to handle fair housing complaints and activities:

Patricia Schneider
Director of Human Services
Human Services Office • 303 Maple Road
Mansfield, CT 06268
860-429-3315

The Fair Housing Officer is responsible for the intake and processing of all housing complaints as well as implementation of the Fair Housing Plan activities and actions. While not expected to be an “expert” in Fair Housing Laws, at a minimum, the officer will be familiar with the complaint process and federal and state laws, which address Fair Housing. Records which show the date, time, nature of complaint and decisions made in the complaint process will be fully documented.

A separate file will maintain a record of all housing discrimination complaints and follow-up actions.

III. COMPLAINT PROCESS

Housing discrimination complaint forms such as Forms HUD-903 and HUD-903A (Spanish version) from HUD, as well as, a summary of actions which may constitute housing discrimination, and instructions for completing and filing housing discrimination complaints will be made available to citizens at the Human Services Office, 303 Maple Road, Mansfield, Connecticut. Complaints need not be made on official forms to be valid.

Forms will also be distributed to lenders, realtors, and at other public places such as the Town Hall and Library periodically.

The Fair Housing Officer will reasonably assist the complainant in submitting the complaint to the appropriate body by providing assistance in explaining the form and/or contacting the appropriate office and allowing the use of town phones for communication.

The individual(s) filing the complaint will then be advised of the option of filing directly with the U.S. Department of Housing and Urban Development (HUD) within one year after an alleged violation, the Connecticut Commission on Human Rights and Opportunities (CHRO) by filing a notarized complaint within 180 days of the alleged violation, or the Equal Employment Opportunity Commission or with all agencies simultaneously. The individual should also be advised of the option of filing suit, at his/her expense in Federal District Court or State Court within two years of an alleged violation. The individual should be further advised that if he/she cannot afford an attorney, the Court may appoint one and that a suit may be commenced even after filing a complaint, if the individual has not signed a conciliation agreement and an Administrative Law Judge has not started a hearing.

A court may award actual and punitive damages and attorney's fees and costs.

The Fair Housing Officer will keep a record of the progress on the number of complaints filed, actions taken, and the status of each complaint.

IV. OPPORTUNITY MAPPING

Using the Connecticut Opportunity Map, which is available at the DOH website, the Town has determined that the target area for the proposed project or activity is a high and very high opportunity area.

V. IMPLEMENTATION AND ACTION STEPS

The Town will take specific action steps and implementation activities over the next three-year period following the guidelines provided by DOH.

Encourage the creation and rehabilitation of affordable housing in a variety of locations

1. Identify developable land within the municipality for developers of affordable housing.

Encourage the collection and analysis of data to determine if the municipality is meeting its goals to affirmatively further fair housing

3. Report municipal and regional racial and ethnic composition data in municipal POCDs.

Ensure local planning documents affirmatively further fair housing

4. Publish the municipality's POCD on its website.

Convene stakeholders to review proposed legislative solutions to existing impediments to fair housing choice

5. Review occupancy ordinances, regulations and/or guidelines to ensure that the rules are not unnecessarily restrictive for families with children. At a minimum, they should be in line with reasonable local fire and building codes.
7. Review zoning ordinances to determine if they require special permits for affordable housing or require large lot sizes, low density requirements, or other policies that would make the development of affordable housing expensive and propose changes to such requirements.
8. If the municipality's zoning ordinance does not include a statement that people with disabilities have the right to request a reasonable accommodation of a change in any zoning ordinance, add this to the existing zoning ordinances.

Promote fair housing enforcement and education

11. Appoint a fair housing officer, have him or her trained on their duties and responsibilities as a fair housing officer, and publicize the person's name, contact information, and job responsibilities.

Additional Steps

- The Town of Mansfield will adopt annually a Fair Housing Policy Statement and a Fair Housing Resolution as an indication of its commitment to Fair Housing Month during the month of April.
- The Town of Mansfield will display its fair housing policies/procedures and ADA policies and grievance procedure on its website.
- The Town of Mansfield will display Fair Housing posters identifying the town's Fair Housing Officer, title, address and phone number in prominent locations. In addition, fair housing information will be distributed outside of traditional municipal locations including local realtors and banks.
- All advertising of residential real estate owned by the Town of Mansfield for sale, rent or financing will contain the Fair Housing logo, equal opportunity slogan as a means of educating the home seeking public that the property is available to all persons regardless of race, color, religion, sex, mental or physical disability, sexual orientation, gender identity or expression, familial status, marital status, national origin, age, ancestry, or lawful source of income.
- All bid advertisements by Town-sponsored programs must include the phrase "Equal Opportunity/Affirmative Action Employer." The type of logo, statement or slogan will depend on the type of media being used (visual or auditory). All logos/statements must appear at the end of the advertisement.

VI. ANALYSIS OF IMPEDIMENTS

The town will cooperate and assist the state with its periodic Analysis of Impediments and conduct a review of policies, practices and procedures that affect the availability and accessibility of housing.

VII. TIMETABLE

The following target dates for completion have been identified for the actions identified in Section V of this Plan:

Action Number	Summary	Target Date
1	Identify developable land for non-profit housing developers. This task will be ongoing throughout the life of the plan as developers contact staff for guidance on potential locations based on the size and infrastructure needs of their project.	Ongoing
3	Report municipal and regional racial and economic data in the Plan of Conservation and Development. Municipal data is currently included in the appendix to the Plan; regional data will be added as part of a planned update related to Section 8-30j, C.G.S. requirements for establishing/updating an affordable housing plan for the Town.	2021
4	Publish the POCD on the Town's Website. The Plan is currently published on the website (http://www.mansfieldct.gov/DocumentCenter/View/2558/-Plan-of-Conservation-and-Development?bidId=) and the anticipated update referenced under Action 3 will also be published on the Website.	2021
5	Review Occupancy Regulations to ensure they are not overly restrictive for families. The current definition of Family includes "functional families" to provide flexibility for non-traditional families. Other occupancy regulations will be reviewed as part of the Town's overall Zoning Rewrite Project.	2021
7	Propose Changes to Zoning Regulations to reduce barriers to affordable housing. Lot size requirements and review procedures for affordable housing developments will be reviewed as part of the Town's overall Zoning Rewrite Project.	2021
8	Propose Changes to Zoning Regulations to address reasonable accommodations for persons with disabilities. Revisions related to providing accommodations for persons with disabilities will be reviewed as part of the Town's overall Zoning Rewrite Project.	2021
11	Appoint a Fair Housing Officer. The Town has had a Fair Housing Officer for many years. Should the current Fair Housing Officer retire or should the responsibilities be transferred to another individual, training of that individual and publication of their contact information will occur.	Ongoing

VIII. AMENDMENTS

The Town Manager shall amend and revise this Plan as required to keep current with state/federal affirmative action and equal opportunity policies and procedures and local actions and activities to further the purposes of this Plan.

John C. Carrington
Interim Town Manager

Date



TOWN OF MANSFIELD FAIR HOUSING ACTION PLAN

RESOLUTION APRIL 24, 2017

I. STATEMENT OF POLICY

It shall be the policy and commitment of the Town of Mansfield to ensure that fair and equal housing opportunities are granted to all persons, in all housing opportunities and development activities funded by the Town, regardless of race, color, religion, sex, sexual orientation, gender identity or expression, marital status, lawful source of income, familial status, national origin, ancestry, age or mental or physical disability. This shall be done through a program of education, an analysis of impediments, and designation of a Fair Housing Officer and development of a procedure for complaints of discrimination. This plan will incorporate the directives of state and federal laws and executive orders, including, but not limited to:

- Title VI of the Civil Rights Act of 1964
- The Fair Housing Act – Title VIII of the Civil Rights Action of 1968, as amended Executive Order 11063, as amended by Executive Order 12259
- Section 104(b) of Title I of the Housing and Community Development Act of 1974, as amended
- Section 109 of Title I of the Housing and Community Development Act of 1974, as amended
- Section 3 of the Housing and Urban Development Act of 1968, as amended
- Sections 503 and 504 of the Rehabilitation Act of 1973, as amended The Americans with Disabilities Act of 1990
- The Age Discrimination Act of 1975, as amended Executive Order 11246 (as amended by Executive Orders 12375 and 12086) Equal Opportunity under HUD contracts and HUD-assisted Construction Contracts
- Executive Order 12892, Leadership and Coordination of Fair Housing
- Connecticut General Statutes 46a-64c as amended

The Town of Mansfield commits to providing and promoting racial and economic integration in any housing development financially supported with DOH funding and will take affirmative steps to reach beneficiaries from all racial and ethnic groups as well as the physically or mentally handicapped and families with children and to reach a broad range of income eligible beneficiaries for appropriate and applicable housing opportunities.

II. FAIR HOUSING OFFICER

In accordance with Title VIII, Civil Rights Act of 1968, as amended, the Fair Housing Officer below has been designated to handle fair housing complaints and activities

Patricia Schneider
Director of Human Services
4 South Eagleville Road
Mansfield, CT 06268
860-429-3315

The Fair Housing Officer is responsible for the intake and processing of all housing complaints as well as implementation of the Fair Housing Plan activities and actions. While not expected to be an “expert” in Fair Housing Laws, at a minimum, the officer will be familiar with the complaint process and federal and state laws, which address Fair Housing. Records which show the date, time, nature of complaint and decisions made in the complaint process will be fully documented. A separate file will maintain a record of all housing discrimination complaints and follow-up actions.

III. COMPLAINT PROCESS

- Housing discrimination complaint forms such as Forms HUD-903 and HUD-903A (Spanish version) from HUD, as well as, a summary of actions which may constitute housing discrimination, and instructions for completing and filing housing discrimination complaints will be made available to citizens at Town Hall, 4 South Eagleville Road, Mansfield, CT 06268. Complaints need not be made on official forms to be valid.
- Forms will also be distributed to lenders, realtors, and at other public places such as the Library periodically.
- The Fair Housing Officer will reasonably assist the complainant in submitting the complaint to the appropriate body by providing assistance in explaining the form and/or contacting the appropriate office and allowing the use of Town phones for communication.
- The individual(s) filing the complaint will then be advised of the option of filing directly with the U.S. Department of Housing and Urban Development (HUD) within one year after an alleged violation, the Connecticut Commission on Human Rights and Opportunities (CHRO) by filing a notarized complaint within 180 days of the alleged violation, or the Equal Employment Opportunity Commission or with all agencies simultaneously. The individual should also be advised of the option of filing suit, at his/her expense in Federal District Court or State Court

within two years of an alleged violation. The individual should be further advised that if he/she cannot afford an attorney, the Court may appoint one and that a suit may be commenced even after filing a complaint, if the individual has not signed a conciliation agreement and an Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs.

- The Fair Housing Officer will keep a record of the progress on the number of complaints filed, actions taken, and the status of each complaint.

IV. OPPORTUNITY MAPPING

Using the Connecticut Opportunity Map, available at the Department of Housing website, Mansfield has determined that the target area for the proposed project is a high to very high opportunity area.

V. IMPLEMENTATION AND ACTION STEPS

ACTION STEPS

NUMBER	CATEGORY	DESCRIPTION	LEAD STAFF	WHEN
1	Encourage the creation and rehabilitation of affordable housing in a variety of locations.	Identify developable land within the municipality for developers of affordable housing.	Planning and Development	Ongoing
4	Ensure local planning documents affirmatively further fair housing	Publish the Town's Plan of Conservation and Development (POCD) on its website.	Planning and Development	Ongoing
5	Convene stakeholders to review proposed legislative solutions to existing impediments to fair housing choice.	Review occupancy ordinances, regulations and/or guidelines to ensure that the rules are not unnecessarily restrictive for families with children. At a minimum, they should be in line with building codes.	Planning and Development	2017-2018
11	Promote fair housing enforcement and education	Appoint a fair housing officer, have him or her trained on their duties and responsibilities as a fair housing officer, and publicize the person's name, contact information, and job responsibilities.	Town Manager	Complete-Update as Needed

NUMBER	CATEGORY	DESCRIPTION	LEAD STAFF	WHEN
13	Promote fair housing enforcement and education	Refer complaints of housing discrimination to HUD, CHRO or a private fair housing agency.	Fair Housing Officer	Ongoing

ADDITIONAL STEPS

STEP	LEAD STAFF	WHEN
<p>Annual adoption of Fair Housing Policy Statement and Fair Housing Resolution The Town of Mansfield will adopt annually a Fair Housing Policy Statement and a Fair Housing Resolution as an indication of its commitment to Fair Housing Month during the month of April.</p>	Fair Housing Officer	Annually-Month of April
<p>Display of Fair Housing, ADA, and Grievance Policies and Procedures The Town of Mansfield will display its fair housing policies/procedures and ADA policies and grievance procedure on its website.</p>	Fair Housing Officer	Ongoing
<p>Fair Housing Posters The Town will display Fair Housing Posters identifying the Town's Fair Housing Officer, title, address and phone number in prominent locations.</p>	Fair Housing Officer	Ongoing
<p>Distribution of Fair Housing Information Fair Housing information will be distributed outside of traditional municipal locations including realtors and banks.</p>	Fair Housing Officer	Annually-Month of April
<p>Advertising of Residential Real Estate All advertising of residential real estate owned by the Town of Mansfield for sale, rent or financing will contain the Fair Housing logo, equal opportunity slogan as a means of educating the home seeking public that the property is available to all persons regardless of race, color, religion, sex, mental or physical disability, sexual orientation, gender identity or expression, familial status, marital status, national origin, age, ancestry, or lawful source of income.</p>	Purchasing Agent	As needed
<p>Bid Advertisements All bid advertisements by town sponsored programs must include the phrase "Equal Opportunity/Affirmative Action Employer." The type of logo, statement or slogan will depend on the type of media being used (visual or auditory). All logos/statements must appear at the end of the advertisement.</p>	Purchasing Agent	As needed

VI. ANALYSIS OF IMPEDIMENTS

The Town will cooperate and assist the state with its periodic Analysis of Impediments and conduct a review of policies, practices and procedures that affect the vulnerability and accessibility of housing.

TIMETABLE

The Town will carry out the abovementioned action steps within three years of the adoption of this Plan.

AMENDMENTS

The Town Manager shall amend and revise this Plan as required to keep current with state/federal affirmative action and equal opportunity policies and procedures and local actions and activities to further the purposes of this Plan.

Maria E. Capriola

Maria E. Capriola
Interim Town Manager

8/31/2017

Date



**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
CITIZEN PARTICIPATION PLAN**

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SECTION 1 - INTRODUCTION

The Town of Mansfield has designed this community-wide Citizen Participation Plan to provide for and encourage citizen participation in the Community Development Block Grant (CDBG) program. This Plan is an essential element of the Town of Mansfield's present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by the Connecticut Department of Housing (DOH) and the U.S. Department of Housing and Urban Development (HUD). This Plan supersedes all other Citizen Participation Plans which may have been adopted by the Mansfield Town Council.

The primary goal of this Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of the Town of Mansfield's CDBG program(s). The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.

Citizens are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program(s) will lie with the Mansfield Town Council.

SECTION 2 - SCOPE OF PARTICIPATION

The Town of Mansfield will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG program(s) undertaken by the Town of Mansfield. Local officials will make every effort to involve citizens in all phases of the development, implementation and assessment of community development programs including, but not limited to, the following phases:

- a. Identification and assessment of housing and community development needs; determination of CDBG project(s) and documentation; and the development of CDBG application(s);
- b. Changes and/or amendments to approved CDBG projects; and,
- c. Assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in an open manner. Citizens of the Town of Mansfield are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

SECTION 3 - CITIZEN PARTICIPATION CONTACT PERSON

Jillene Woodmansee, Planning Specialist, has been designated Citizen Participation Coordinator by the Town Manager and will serve as the contact person for all matters concerning citizen participation activities. This person shall be responsible for overseeing citizen participation throughout the community development process and the implementation of all citizen participation activities and functions, except those which may be specifically delegated to other parties by this Plan.

The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but not necessarily be limited to: disseminating information concerning proposed projects and the status of current project activities; coordinating various groups which may be participating in the community development process; receiving written comments; serving as a vehicle by which ideas, comments, and proposals from local residents may be transmitted to local officials and/or program staff; and, monitoring the citizen participation process and proposing such amendments to the Citizen Participation Plan as may be necessary.

The Citizen Participation Coordinator may be contacted at the Department of Planning and Development, 4 South Eagleville Road, Mansfield, CT 06268 and via telephone at 860.429.3341 during regular business hours. All questions concerning citizen participation in the community development process should be addressed to the Citizen Participation Coordinator.

SECTION 4 - TECHNICAL ASSISTANCE

The Town of Mansfield staff shall provide technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG program(s).

Such technical assistance is intended to increase citizen participation in the community development decision-making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of CDBG program requirements.

Technical assistance shall be provided on request and may include, but not necessarily be limited to:

- Interpreting the CDBG program and its rules, regulations, procedures and/or requirements;
- Providing information and/or materials concerning the CDBG program; and
- Assisting low and moderate-income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

Technical assistance may be obtained by contacting the Town Manager's Office of the Town of Mansfield or Citizen Participation Coordinator.

SECTION 5 - PUBLIC HEARINGS

Citizen participation in the community development process will be conducted on a community-wide basis and will actively involve the views and proposals of all citizens, especially low and moderate-income persons and residents of areas where CDBG activities are proposed or ongoing.

Public hearings will be held during all phases of the community development process, as outlined herein, to allow citizens to voice opinions and offer proposals concerning the development and performance of CDBG programs. Local officials will respond to questions and proposals from citizens at each public hearing. Any questions that citizens may have concerning a program will be answered and their comments, suggestions, and/or proposals will be received. Citizens may also express comments and views concerning the community development process or any specific CDBG project to the governing body at any regularly scheduled meeting.

5.1 Public Hearing Times and Locations

All public hearings will be held at times and locations which will be accessible to all citizens, especially persons of low and moderate incomes, and residents of blighted neighborhoods and CDBG project areas.

Public hearings will be scheduled for convenient times as determined by the Town Council. Public hearings may be held at any site which, in the opinion of the Town of Mansfield, provides adequate access for citizen participation.

Hearings will normally be held at the Mansfield Town Hall. This site is centrally located and generally accessible to all citizens. This building is also accessible to persons with disabilities. Hearings may, however, at the option of the Town of Mansfield, be held at an alternate location to be specified in the public hearing notice(s).

5.2 Application Public Hearing

At least one public hearing shall be held during any CDBG program fiscal year prior to the submission of an application to the DOH for CDBG assistance. The primary purposes of the public hearing shall be to assess community needs and problems in an effort to determine the most critical needs to be addressed by the CDBG program; and also to present for public comment and review the program activities which have been selected by the Town of Mansfield to resolve the identified needs.

An application public hearing will be held during the initial stage of program development to discuss items regarding community development and housing needs, the CDBG program, and the application process. The objective of citizen participation at this stage is to provide meaningful, community-wide citizen input into the decision-making process during the assessment of community needs and the consideration of priorities and options associated with the development and submission of a CDBG application. Local officials will also entertain proposals and comments from citizens concerning community development activities at this hearing.

This hearing will normally serve to discuss and review the information appropriate for all applications submitted by the Town of Mansfield during any fiscal year. Substantial changes in community development or housing needs in the community as determined

by local officials may necessitate another hearing to fulfill the role of the first public hearing prior to the submission of other CDBG applications late in the fiscal year.

Citizens will be provided with information concerning the CDBG program at this public hearing. Such information shall include, but not necessarily be limited to: the goals and objectives of the CDBG program; the total amount of CDBG funds available; the role of citizens in program planning, implementation, and assessment; the range of activities which may be undertaken; the process to be followed in developing a CDBG application; the application timetable(s); the application rating process; the schedule of meetings and hearings; activities previously funded in the Town of Mansfield through the CDBG program; and, an identification of projects which could result in the relocation of area residences or businesses; and the actions that would be undertaken if such relocation were necessary. Furthermore, the effectiveness of the Citizen Participation Plan in allowing citizen participation in the community development process and potential changes and/or amendments to the Plan will also be discussed at this meeting.

The Town of Mansfield may, at the option of local officials, review multiple CDBG project applications at one hearing when more than one application is to be submitted during the same fiscal year. Each such hearing shall be held prior to, and in preparation for, the application's approval by the Town Council.

A second objective of citizen participation during this stage is to inform citizens of the proposed project activities to be included in a CDBG application(s) and to solicit comments from citizens concerning these activities.

Citizens attending this hearing will be provided with information concerning the CDBG project(s) proposed including, but not necessarily limited to: the project application(s) to be submitted and the applicable CDBG fund; specific project activities to be included; the location of the project activities; the approximate cost estimate for the proposed activities; the estimate of local match required; the impact of the project on low and moderate income persons; and, the approximate application submittal date.

5.3 Amendment Public Hearings

The Town of Mansfield will assure the opportunity for citizen participation during the implementation of any CDBG program(s) when changes to the project are under consideration by the Town of Mansfield. Citizen participation shall be obtained and considered in any amendments to a CDBG program which involves changes in dollar amount spent on any activity, changes in program beneficiaries, changes in the location of approved activities, addition to or deletion of project activities, and major budget shifts between approved activities.

To ensure adequate opportunity for citizen participation during CDBG programs, the Town of Mansfield shall hold a public hearing on all formal amendments which require the DOH approval. For "local" amendments (as defined by the DOH) and changes for which the DOH approval is not required, input from citizens concerning changes or amendments will be received at regularly scheduled Town Council meetings where such changes or amendments are considered.

5.4 Assessment of Performance Public Hearings

Citizens of the Town of Mansfield will be provided with the opportunity to comment on the performance of local officials, the Town of Mansfield staff, consultants, engineers, and contractors, and the actual use of CDBG funds during the implementation of a CDBG program. Citizens will also be requested to assess the performance of the Town of Mansfield in resolving identified community development and housing needs, and in achieving its community development goals and objectives. On-going community assessment of the effectiveness of the community development process is considered essential to the success of the CDBG program.

At the conclusion of each CDBG project, a public hearing will be held to review program activities and to assess program performance. This hearing shall be held prior to the submission of the Pre-Close Out Certificate and any other required closeout documents to the DOH for a CDBG project. This hearing will be used to ensure community-wide participation in the evaluation of the CDBG program.

5.5 Additional Hearings

Other public hearings may be held as deemed necessary by the Town Council in order to inform citizens of community development project(s) and activities, and to solicit citizen opinions and comments. All additional hearings shall comply with the requirements set forth in this Plan.

5.6 Limited English Proficiency Residents

The Town of Mansfield has followed the guidance provided in the DOH's Language Access Plan to determine the need to undertake reasonable actions to facilitate the participation of persons with Limited English Proficiency. Local officials will undertake all reasonable actions necessary to allow such persons to participate in the community development process. Such actions may include the provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency.

5.7 Public Hearing Notice

Notice of public hearings will be published in a local newspaper at least seven (7) days prior to the hearing date unless more specific notice requirements are established by the State. The Town of Mansfield may waive hearing notice requirements in cases where unusual circumstances justify alternative means of notifying the general public. In such situations, shorter notice may be given, and public notices posted in public places may be used in place of a notice published in the newspaper. Each notice of a hearing shall include the time, date, place, and topics and procedures to be discussed. Notices for public hearings may be run or posted, separately or together, as may be deemed necessary by the Town Manager of the Town of Mansfield.

5.8 Accessibility to Low and Moderate Income Persons

The public hearing procedures outlined herein are designed to promote participation by low and moderate income citizens, as well as residents of blighted neighborhoods and CDBG project areas in any public hearing(s). Local officials may take additional steps to further promote participation by such groups, or to target program information to these persons should officials feel that such persons may otherwise be excluded or should additional action be deemed necessary. Activities to promote additional

participation may include: posting of notices in blighted neighborhoods and in places frequented by low and moderate income persons, and holding public hearings in low and moderate income neighborhoods or areas of existing or proposed CDBG project activities.

5.9 Accessibility to Persons with Disabilities

The locations of all public hearings as described herein shall be made accessible to persons with disabilities. The Town of Mansfield shall provide a sign language interpreter whenever the Citizen Participation Coordinator is notified in advance that one or more deaf persons will be in attendance. The Town of Mansfield shall provide a qualified reader whenever the Citizen Participation Coordinator is notified in advance that one or more visually impaired persons will be in attendance. Additionally, the Town of Mansfield shall provide reasonable accommodations whenever the Citizen Participation Coordinator is notified in advance that one or more persons with mobility or developmental disabilities will be in attendance.

SECTION 6 - PROGRAM INFORMATION

Citizens will be provided full access to CDBG program information during all phases of a CDBG project. Local officials of the Town of Mansfield shall make reasonable effort to assure that CDBG program information is available to all citizens, especially those of low and moderate incomes and those residing in blighted or Limited English Proficiency neighborhoods and/or CDBG project areas.

To facilitate citizen access to CDBG program information, the Citizen Participation Coordinator will keep all documents related to a CDBG program on file in the Planning and Zoning Office. Information from the project files shall be made available for examination and duplication, on request, during regular business hours. CDBG program information and materials, concerning specific CDBG projects will be available and distributed to the public at the regularly scheduled public hearings as outlined in this Plan. Furthermore, information concerning any CDBG project will be available at regularly scheduled council meetings where the program is discussed.

Materials to be made available shall include, but are not necessarily limited to: the Citizen Participation Plan; records of public hearing; mailings and promotional materials; prior CDBG program applications; letters of approval; grant agreements; the environmental review record; financial and procurement records; project design and construction specifications; labor standards materials; performance and evaluation reports; other reports required by the DOH and/or the HUD; proposed and approved CDBG program application(s) for the current year or project; written comments or complaints received concerning the community development program, and written responses from the Town of Mansfield; and, copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the CDBG program.

In no case shall the Town of Mansfield disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the Town of Mansfield shall not disclose any information which may, in the opinion of the Town Manager, be deemed of a confidential nature.

SECTION 7 - PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS

The public hearings scheduled, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the community development process. Citizens are encouraged to submit their views and proposals on all aspects of a community development program at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the community development program on a continuous basis, citizens may, at any time, submit written comments or complaints to the Town of Mansfield.

Any citizen or citizen's group desiring to comment or object to any phase of the planning, development or approval of the application for CDBG funds, or to the implementation of any CDBG program, should submit such comments or objections in writing to the Town Manager. Should, after a reasonable period, a party believe that his/her comment or complaint has not been properly addressed or considered by the Town Manager, then the aggrieved may appeal his/her case to the Town Council.

Local officials shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable. Should the Town Council be unable to sufficiently resolve an objection or complaint, it may be forwarded by the aggrieved party to the DOH.

Citizens may, at any time, contact the DOH and/or the HUD directly to register comments, objections or complaints concerning the Town of Mansfield's CDBG application(s) and/or program(s). Citizens are encouraged, however, to attempt to resolve any complaints at the local level as outlined above prior to contacting the DOH or the HUD.

All comments or complaints submitted to the DOH or HUD shall be addressed in writing to:

Connecticut Department of Housing
Attn: CDBG Small Cities Program
505 Hudson Street
Hartford, Connecticut 06106-7106

or

U.S. Department of Housing and Urban Development
Attn: Community Planning and Development Division
One Corporate Center
20 Church Street, 10th Floor
Hartford, Connecticut 06103-3220

Records of all comments, objections and/or complaints by citizens concerning the Town of Mansfield's CDBG program and subsequent action taken in response to those comments shall be maintained on file at the Planning and Zoning Office and shall be made available for public inspection upon request.

SECTION 8 - AMENDMENTS

The Town of Mansfield may, from time to time, modify the provisions outlined herein through amendment to this Citizen Participation Plan. It shall be the policy of the Town of Mansfield to periodically review and discuss the effectiveness of this Citizen Participation Plan in allowing citizen participation in the community development process and in helping to meet the community development needs and goals identified by the citizens of the Town of Mansfield. To this end, the effectiveness of the Plan will be discussed at public hearings held in conjunction with the community development program as discussed herein, and potential amendments to the Plan will be reviewed at that time.

Amendments to the Plan will be made as necessary. All amendments shall be approved by resolution of the Town Council and shall be incorporated into this Plan.

SECTION 9 - AUTHORITY

No portion of this Citizen Participation Plan shall be construed to restrict the responsibility and authority of the elected officials of the Town of Mansfield in the development, implementation and execution of any Community Development Block Grant program.

APPROVED this, the 15th day of May, 2020.

Antonia Moran
Mayor

John C. Carrington
Interim Town Manager

SECTION 3 PLAN

This Plan will serve as the Town of Mansfield's Section 3 Plan in compliance with the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD assisted projects covered by Section 3, are, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations directed to low- and moderate-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

APPLICABILITY

This Section 3 Plan applies to all of Mansfield's federally funded activities for housing and community development that are over the mandated thresholds.

PURPOSE

The purpose of the Section 3 Plan is to provide to the greatest extent feasible economic opportunities for low- and very low-income persons in the form of training, employment, contracting and other economic opportunities arising in connection with the expenditure of housing assistance (including Section 8 assistance), and community development assistance used for the following projects:

- (i) Housing rehabilitation (including reduction and abatement of lead-based paint hazards, but excluding routine maintenance, repair and replacement).
- (ii) Housing construction; and
- (iii) Other public construction.

Economic opportunities provided under this Section 3 Plan will be consistent with Federal, State and local laws and regulations, including employment and contracting procedures established by the State for all state agencies.

EMPLOYMENT AND CONTRACTING GOALS

The Town of Mansfield will comply, to the greatest extent feasible, with the goals established in this section, when awarding contracts or conducting new hires resulting from activities or projects subject to the requirements of Section 3.

The goals apply to housing and community development activities for which the amount of assistance received from HUD exceeds \$200,000; and the contract or subcontract exceeds \$100,000.

Employment Goals

Training and employment opportunities will be made available to Section 3 residents as follows:

- (i) Thirty percent (30%) of the aggregate number of new hires for the one year period beginning in FY2020 and continuing thereafter.

The following order of preferences will be maintained in meeting the goals established above.

- (i) First priority will be given to Section 3 residents in the service area or neighborhood in which the Section 3 covered project is located
- (ii) Second priority will be given to participants in HUD Youthbuild Programs
- (iii) Third priority will be given to homeless persons residing in the service area or neighborhood in which the Section 3 covered project is located for housing constructed under the Stewart B. McKinney Homeless Assistance Act
- (iv) Other Section 3 residents.

Persons requesting consideration for the above preferences will be required to submit the appropriate documentation to demonstrate their eligibility. Acceptable documentation includes, but is not limited to the following:

- Proof of residency in a public housing development;
- Evidence of eligibility for Section 8 certificate or voucher;
- Evidence of eligibility for a federally assisted program for low/mod income (e.g. Jobs, JTPA, Jobs Corps.);
- Evidence of eligibility for a State or local assistance program for low/mod income, or receipt of AFDC; or
- Self-certification statement of income eligibility.

Contracting Goals

This section applies to contractors and subcontractors performing work on Section 3 covered project(s) where the amount of the contract or subcontract exceeds \$100,000.

The Town of Mansfield commits to award to Section 3 business concerns:

- (i) At least ten percent (10%) of the total dollar amount of all Section 3 covered contracts for building trades work arising in connection with housing rehabilitation, housing construction and other public construction; and
- (ii) At least three percent (3%) of the total dollar amount of all other Section 3 covered contracts.

The following order of preference will be followed when providing contracting opportunities to Section 3 businesses:

- (i) First priority will be given to Section 3 business concerns that provide economic opportunities for Section 3 residents in the service area or neighborhood in which the Section 3 covered project is located, and
- (ii) Second, applicants selected to carry out HUD Youthbuild Programs.

Procurement activities from this award will be conducted in a competitive manner, consistent with 24 CFR 85.36(c)(2).

Businesses requesting consideration for the above preferences will be required to submit the appropriate documentation to demonstrate their eligibility.

SECTION 3 COVERED PROJECT AREA

The area for Section 3 covered project(s) will be the following ten (10) towns:

Mansfield	Windham	Willimantic	Willington	Coventry
Bolton	Chaplin	Tolland	Hampton	Ashford

SECTION 3 RESIDENT

A Section 3 resident means:

- (i) A public housing resident; or
- (ii) An individual who resides in the metropolitan area or nonmetropolitan county in which the Section 3 covered assistance is expended, and who is:
 - a. A low-income person, as this term is defined in Section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act defines this term to mean families (including single persons) whose incomes do not exceed 80 per centum of the median income for the area, as determined by the Secretary...
 - b. A very low-income person, as this term is defined in Section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act defines this term to mean families (including single persons) whose incomes do not exceed 50 per centum of the median income for the area, as determined by the Secretary...
 - c. A person seeking the training and employment preference provided by Section 3 bears the responsibility of providing evidence (if requested) that the person is eligible for the preference. Section 8 assistance means assistance provided under Section 8 of the 1937 Act (42 U.S.C. 1437f) pursuant to 24 CFR Part 882, subpart G.

SECTION 3 BUSINESS CONCERN

A business will qualify as a Section 3 Business Concern if it meets one or more of the following criteria:

- (i) At least 51% of the legal owners of the business qualify as Section 3 residents; or
- (ii) Whose permanent, full-time employees include persons, at least 30 percent of whom are currently Section 3 residents, or within three years of the date of first employment with the business concern were Section 3 residents; or
- (iii) That provides evidence of a commitment to subcontract in excess of 25 percent of the dollar award of all subcontracts to be awarded to business concerns that meet the qualifications set forth in paragraphs (i) or (ii).

MECHANISM TO BE ADOPTED TO COMPLY, TO THE GREATEST EXTENT FEASIBLE, WITH THE EMPLOYMENT AND CONTRACTING GOALS

The Town of Mansfield commits to do the following:

1. Send notices of job availability subject to these requirements to recruitment sources and organizations which are capable of referring eligible Section 3 applicants.
2. Send out letters to community organizations requesting their assistance in recruiting qualified Section 3 residents for specific, state employment certification lists.

3. Work with the State of Connecticut's Department of Administrative Services Recruitment Division in recruiting qualified Section 3 residents for specific, state employment certification lists.
4. Inform all developers, bidders, contractors and sub-contractors performing work on a Section 3 funded activity of their responsibility to comply with the federal requirements.
5. Maintain a record of all communications, statements, advertisements and contract provisions directed at disseminating the Town's commitment to these requirements.
6. Refrain from knowingly doing business with any developer, bidder, contractor, sub-contractor or supplier of materials upon notification from HUD that the entity has been found to be in violation of the Section 3 mandates.
7. Network and cooperate with State agencies including the Department of Labor and the Department of Social Services to create training and employment opportunities for low- and very low-income residents.
8. When determining the responsibility of potential contractors, consider their record of Section 3 compliance as evidenced by past actions and their current plans for the pending contract.
9. Contact business assistance agencies, minority contractor's associations and community organizations utilized as resource centers to inform them of contracting opportunities and request their assistance in identifying Section 3 businesses that may be interested in bidding for work in connection with Section 3 covered assistance.
10. Provide written notice to known Section 3 business concerns of contracting opportunities. The notice will allow sufficient time for the Section 3 business concerns to respond to the bid invitation or request for proposals.
11. Follow up with Section 3 business concerns that have expressed interest in participating in contracting opportunities.
12. Advise Section 3 business concerns where they might seek assistance to overcome limitations such as inability to obtain bonding, lines of credit, financing, or insurance.
13. Where appropriate, break out contract work items into economically feasible units to facilitate participation by Section 3 business concerns.
14. Contact agencies administering HUD Youthbuild programs to notify them of contracting opportunities.
15. Advertise contracting opportunities through trade associations, newspaper(s) of general circulation and minority newspapers.
16. Support businesses that provide economic opportunities to low-income persons by linking them to support services available through the Small Business Administration (SBA), the Department of Commerce and comparable agencies at State and local levels.
17. Support joint ventures with Section 3 business concerns.

ALL CONTRACTS SUBJECT TO THE SECTION 3 REQUIREMENTS WILL INCLUDE THE FOLLOWING CLAUSE

Section 3 Clause

- A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.
- B. The parties to this contract agree to comply with HUD's regulations in 24 CFR Part 135, which implement Section 3. As evidenced by their execution of the contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the Part 125 regulations.
- C. The contractor agrees to send each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or worker's representative of the contractor's commitments under this Section 3 Clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth the minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each, the name and location of the person(s) taking applications for each position and the anticipated date the work shall begin.
- D. The contractor agrees to include this Section 3 Clause in every subcontract subject to compliance with the regulations in CFR Part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 Clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR Part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR Part 135.
- E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR Part 135 required employment opportunities to be directed; were not filled to circumvent the contractor's obligations under 24 CFR Part 135.
- F. Noncompliance with HUD's regulations in 24 CFR Part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

ANNOUNCEMENT OF PROGRAM AVAILABILITY

All Mansfield's programs are subject to the requirements of Section 3, for which awards are made on a competitive basis for housing rehabilitation, construction, or other public construction, and where the amount to be awarded to the applicant exceeds \$200,000 will include in the announcement a Section 3 statement, informing the prospective applicants that the funds are subject to these requirements.

The following statement will be included:

In accordance with the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, to the greatest extent feasible training, employment and contracting opportunities, derived from these funds must be given to Section 3 residents and Section 3 businesses.

FILING AND PROCESSING COMPLAINTS

Any individual or business concern alleging that the Town of Mansfield or any of its funding recipients are in violation of the requirements of this Act, may file a complaint with the Town Manager’s Office. Complaints filed with this Office will follow the internal grievance procedure.

CONCLUDING STATEMENT

As Town Manager of the Town of Mansfield, I pledge the Town’s commitment to fully comply to the greatest extent feasible with the objectives of this Plan.

John C. Carrington
Interim Town Manager

Date

RESIDENTIAL ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN

The Town of Mansfield shall minimize the displacement of persons as a result of activities assisted with funds provided directly or indirectly by the US Department of Housing and Urban Development (HUD).

However, in the event that a project requiring displacement is undertaken, the Town of Mansfield, in compliance with Section 104(d) of the Housing and Community Development Act of 1974 as amended will replace all occupied and vacant occupiable low- and moderate-income dwelling units demolished or converted to a use other than as low- and moderate-income housing as a direct result of activities assisted with federal funds, as described in 24 CFR 42.301 and in Section 570.606.

All replacement housing will be provided within three years of the commencement of the demolition or rehabilitation relating to conversion. Before obligating or expending funds that will directly result in such demolition or conversion, the Town of Mansfield will make public and submit to the State of Connecticut's Department of Housing the following information in writing:

1. A description of the proposed assisted activity;
2. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low- and moderate-income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of demolition or conversion;
4. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
5. The source of funding and a time schedule for the provision of replacement dwelling units; and
6. The basis for concluding that each replacement dwelling unit will remain a low- and moderate-income dwelling unit for at least twenty (20) years from the date of initial occupancy.

The Town of Mansfield will provide relocation assistance, as described in 24 CFR 42.350, to each low- and moderate-income household displaced by the demolition of housing or by the conversion of a low- and moderate-income dwelling to another use as a direct result of assisted activities.

Consistent with the goals and objectives of activities assisted under the Act, the Town of Mansfield will require the following to minimize the displacement of people from their homes:

The owner of the property shall certify adherence to the following conditions for participation in the Mansfield Small Cities Block Grant Program:

1. That no tenant has been, or will be, dislocated without due cause, for the purpose of evading terms of the agreement.

2. When a low- and moderate-income tenant occupied unit, or vacant unit is assisted under the Program, that unit will continue to be occupied by a low- and moderate-income household for five (5) years following the close of the work.
3. The rent collected from assisted units will be limited to the maximum allowed by the Fair Market Rent determined by the US Department of Housing and Urban Development (HUD) or the State's Department of Economic and Community Development (DECD) for a period of three (3) years following the completion of the work. *
4. The property owner shall not refuse to rent to tenants holding HUD Section 8 Housing Certificates or Vouchers, State Chapter 707 Housing Certificates, or any other recognized housing voucher certificate except for good cause such as tenants who failed to pay the rent, maintain the dwelling unit, or otherwise are in violation of the terms and conditions of the tenancy.
5. The property owner shall exercise affirmative fair housing marketing for the units in the subject property when they become vacant and shall not discriminate in housing on the grounds of race, color, national origin, ancestry, age, religion, welfare status, children, marital status, physical handicaps, sexual orientation or sex.
6. Dwelling units in the subject property will be maintained in a decent, safe, and sanitary condition.

*The "Barney Frank" amendment to Section 104(d) of the Housing and Community Development Act of 1974 requires that the rent of a low- or moderate-income tenant cannot be raised to exceed 30% of their income for a period of five (5) years after the unit has been assisted with Small Cities Block Grant monies.

May 15, 2020

John C. Carrington
Interim Town Manager

POLICY MEMORANDUM

To: All Citizens and Town Employees
From: John Carrington, Interim Town Manager
Date: May 15, 2020 (Revised), March 25, 2019 (Revised), April 9, 2012 (Revised), April 25, 2011 (Revised), April 26, 2010 (Revised)
Subject: Compliance with Title VI of the Civil Rights Act of 1964 Policy Statement

I. STATEMENT OF POLICY

The Town of Mansfield does not discriminate in the provision of services, the administration of its programs, or contractual agreements. The Town of Mansfield seeks to fully carry out its responsibilities under the Title VI Regulations.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the grounds of race, color or national origin in programs and activities receiving Federal financial assistance. Title VI provides that “No person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs” covered by the Regulations.

This policy is effectuated through the methods of administration outlined in Mansfield’s Fair Housing Plan and is fully implemented to ensure compliance by the Town, as the recipient, and by sub-recipients. The cooperation of all Town of Mansfield personnel is required.

II. RELEVANT FEDERAL LAWS AND REGULATIONS

A. SEC. 601

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

B. SEC. 602

Each Federal department and agency which is empowered to extend Federal financial assistance to any program or activity, by way of grant, loan, or contract other than a contract of insurance or guaranty, is authorized and directed to effectuate the provisions of section 601 with respect to such program or activity by issuing rules, regulations, or orders of general applicability which shall be consistent with achievement of the objectives of the statute authorizing the financial assistance in connection with which the action is taken. No such rule, regulation, or order shall become effective unless and until approved by the President. Compliance with any requirement adopted pursuant to this section may be effected (1) by the termination of or refusal to grant or to continue assistance under such program or activity to any recipient as to whom there has been an express finding on the record, after opportunity for hearing, of a failure to comply with such requirement, but such termination or refusal shall be limited to the particular political entity, or part thereof, or other recipient as to whom such a finding has been made and, shall be limited in its effect to the particular program, or part thereof, in which such non-compliance has been so found, or (2) by any other means authorized by law: Provided, however, That no such action shall be taken until the department or agency concerned has advised the appropriate person or persons of the failure to comply with the requirement and has determined that compliance cannot be secured by voluntary means. In the case of any action terminating, or refusing to grant

or continue, assistance because of failure to comply with a requirement imposed pursuant to this section, the head of the federal department or agency shall file with the committees of the House and Senate having legislative jurisdiction over the program or activity involved a full written report of the circumstances and the grounds for such action. No such action shall become effective until thirty days have elapsed after the filing of such report.

C. SEC. 603

Any department or agency action taken pursuant to section 602 shall be subject to such judicial review as may otherwise be provided by law for similar action taken by such department or agency on other grounds. In the case of action, not otherwise subject to judicial review, terminating or refusing to grant or to continue financial assistance upon a finding of failure to comply with any requirement imposed pursuant to section 602, any person aggrieved (including any State or political subdivision thereof and any agency of either) may obtain judicial review of such action in accordance with section 10 of the Administrative Procedure Act, and such action shall not be deemed committed to unreviewable agency discretion within the meaning of that section.

D. SEC. 604

Nothing contained in this title shall be construed to authorize action under this title by any department or agency with respect to any employment practice of any employer, employment agency, or labor organization except where a primary objective of the Federal financial assistance is to provide employment.

E. SEC. 605.

Nothing in this title shall add to or detract from any existing authority with respect to any program or activity under which Federal financial assistance is extended by way of a contract of insurance or guaranty.

This Title VI Policy Statement re-affirms my personal commitment to the principals of nondiscrimination.

May 15, 2020

John C. Carrington
Interim Town Manager

POLICY MEMORANDUM

To: All Town Employees
From: John Carrington, Interim Town Manager
Date: May 15, 2020 (Revised), August 31, 2017 (Revised), May 31, 2011 (Revised), May1, 2010 (Revised), April 1, 1998 (Original)
Subject: Affirmative Action Policy

I. PURPOSE

The Affirmative Action and Equal Employment Opportunity policy of the Town of Mansfield (The Town) aims to reduce, and wherever possible, eliminate actual and apparent under-representation of minorities, women, older persons, and all persons of protected classes in the Town's workforce.

The Town of Mansfield will implement, monitor and enforce this Affirmative Action Policy Statement in conjunction with the applicable federal and state laws, regulations and executive orders listed below: 13th, 14th and 15th Amendments of the United States Constitution, Civil Rights Act of 1866, 1870, 1871, Equal Pay Act of 1963, Title VI and VII of the 1964 United States Civil Rights Act, Presidential Executive Orders 11246, amended by 11375, (Nondiscrimination under federal contracts), Act 1 Section 1 and 20 of the Connecticut Constitution, Governor Grasso's Executive Order Number 11, Governor O'Neill's Executive Order Number 9, the Connecticut Fair Employment Practices Law (46a-60-69), Connecticut Code of Fair Practices (46a-70-81), Deprivation of Civil Rights (46a-58(a)(d))Discrimination against Criminal Offenders (46a-80). Connecticut General Statutes, Connecticut Code of Fair Accommodations Law (46a-63-64), Connecticut General Statutes 46a-64c as amended, definition of Blind (46a-51(1)), definition of Physically Disabled (46a-51 (15)), definition of Mentally Retarded (46a-51(13)), cooperation with the Commission of Human Rights and Opportunities (46a-77), Sexual Harassment (46-60(a)), Connecticut Credit Discrimination Law (360436 through 439), Title I of the State and Local Fiscal Assistance Act of 1972 and the Americans with Disabilities Act of 1992. Such orders and legislation were enacted to ensure that all persons have the right and benefit of equal employment opportunity in a society that not only legally mandates equality but practices it as well.

II. STATEMENT OF POLICY

The Town of Mansfield is an equal employment opportunity/ affirmative action employer. In order to ensure that employees and job applicants are not subject to unlawful discrimination, it is the Town's policy to comply with all laws and regulations that prohibit employment discrimination and mandate specific actions for the purpose of eliminating the present effects of past discrimination. Equal employment opportunity is the purpose and goal of affirmative action. The Town has established equal employment opportunity and affirmative action as immediate and necessary objectives because we are committed to its concepts, principles, and goals.

Equal employment opportunity (EEO) means nondiscrimination -that is, hiring and promoting without regard to race, color, ethnicity, religious creed, age, sex, marital status, national origin, ancestry, sexual orientation, gender identity or expression, genetic information, physical or mental disabilities (including learning disabilities, mental retardation, past/present history of mental disorder), prior conviction of a crime (or similar characteristics), workplace hazards to reproductive systems, or other factors which cannot lawfully be the basis for employment actions, unless there is a bona fide occupational qualification. To attain parity demands affirmative action, a program of purposeful activity undertaken with conviction and effort to overcome barriers to equal employment opportunity. Affirmative action plans and programs are designed to:

- Overcome any remaining effects of past practices, policies or barriers to equal employment opportunity, and
- Achieve the full and fair participation of all protected class members groups found to be underutilized in the workplace, or adversely impacted by policies or practices. Specifically, women, Asians, Blacks, Hispanics, Native Americans, persons with disabilities, and other protected groups.

Affirmative Action is necessary throughout the employment process, from the posting of job notices through hiring to the termination of employment. The Town regularly reexamines all policies and procedures to discover and remove barriers to access, and to change practices that may have an illegally discriminatory impact. We also seek to accelerate the entry of members of underrepresented groups into the workforce, and to support their mobility once they are hired. We are equally vigilant in ensuring that all terms, conditions, and privileges, including upward and lateral mobility, are equitably administered.

Employees and others wishing to file complaints of discrimination or of affirmative action policy violations may do so by contacting:

Holly Schaefer, Director of Human Resources

Town of Mansfield
4 South Eagleville Road
Mansfield, CT 06268
PHONE: 860-429-3395

State of Connecticut Commission on Human Rights and Opportunities

Eastern Region Office
100 Broadway
Norwich, CT 06360
PHONE: (860) 886-5703

This policy statement will be provided to all employees through the employee intranet site which is available 24 hours a day / 7 days a week. The Town expects that each supplier, union, consultant and other entities with which it does business to comply with all applicable State and Federal Equal opportunity laws and regulations. The Town will not knowingly do business with an entity debarred from participation in any federal or state program or found to be in violation of any state or federal discrimination law.

This policy statement reaffirms the Town's commitment to the principals of Equal Employment Opportunity and to achieving the successful implementation of our goals and objectives.

May 15, 2020

John C. Carrington
Interim Town Manager



TOWN OF MANSFIELD
RESOLUTION ADOPTING A POLICY PROHIBITING THE EXCESSIVE USE
OF FORCE AGAINST ANY INDIVIDUAL ENGAGED IN NON-VIOLENT CIVIL
RIGHTS DEMONSTRATION

WHEREAS The Congress of the United States has passed the Armstrong/Walker “Excessive Force” Amendment (Section 104 (L)(1) of Title I of the Housing and Community Development Act of 1974 as amended) prohibiting the use of excessive force by a local law enforcement agency against any individual engaged in nonviolent civil rights demonstration within its jurisdiction;

WHEREAS The Town of Mansfield as a recipient of Community Development Block Grant funds is required to comply with the Armstrong/Walker “Excessive Force” Amendment; and

WHEREAS The use of excessive force against demonstrators may cause the Town to be in violation of previous grant agreements and lose its eligibility for future federal grants;

NOW THEREFORE, BE IT RESOLVED BY THE TOWN COUNCIL OF THE TOWN OF MANSFIELD:

1. It is the policy of the Town that the use of excessive force is prohibited by local law enforcement agencies against individuals engaged in lawful and nonviolent civil rights demonstrations within the Town.
2. The Town hereby adopts a policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
3. The Town Council directs the Town Manager and Resident Trooper to implement this Resolution by amending applicable procedures.

Adopted by the Town of Mansfield Town Council on May 15, 2020.

Antonia Moran
Mayor

Certified a true copy of a resolution adopted by the Town of Mansfield at a meeting of its Town Council on May 15, 2020 and which has not been rescinded or modified in any way whatsoever.

Date
(Seal)

Sara-Ann Chaine, Town Clerk

RELOCATION POLICY

The Town of Mansfield shall minimize the displacement of persons as a result of activities assisted with funds provided directly or indirectly by the US Department of Housing and Urban Development (HUD). However, in the event a project requiring displacement is undertaken, the Town will comply with its Residential Anti-Displacement and Relocation Assistance Plan and this Relocation Policy.

The Town shall provide relocation assistance to each low- or moderate-income household that is **permanently displaced** by demolition or the conversion of their dwelling unit to another use as a direct result of an activity assisted under through HUD Programs. Relocation assistance shall comply with the implementing regulations of 49 CFR Part 24 (Uniform Relocation Act (URA)) or Section 104(d) of the Housing and Community Development Act of 1974 as amended, and Section 570.606, whichever is most beneficial to the tenant. The low- or moderate-income household shall receive relocation assistance pursuant to 24 CFR Part 42 (HUD's regulations implementing the URA) to include advisory services, moving and related expenses, and replacement housing assistance.

If a low- or moderate-income household is required to **temporarily relocate** from their dwelling unit as a direct result of a HUD-assisted activity (e.g. housing rehabilitation/lead paint hazard control), the Town of Mansfield may provide relocation assistance. When necessary, temporary relocation assistance shall be provided as follows:

Owner-occupant

Relocation assistance is not required for homeowners by law. Therefore, the Town will strongly advocate for homeowners to temporarily relocate with family or friends during the rehabilitation process. If the homeowner is low- or moderate-income and is unable to relocate with family, the Town may provide a cash stipend in lieu of relocation expenses to offset relocation expenses. The stipend amount will be based on household size, period (in days) of relocation and work scope (relating to moving personal items).

The Town may make an exception for elderly and/or very low-income homeowners. In these cases, the Town may provide relocation services in excess of a cash stipend to include moving and related expenses and replacement housing assistance.

Tenant households

Tenant household will receive relocation benefits as detailed in the Uniform Relocation Act (49 CFR Part 24).

May 15, 2020

John C. Carrington
Interim Town Manager