



Consolidated Plan

Introduction

The Consolidated Plan (ConPlan) is a federal funding document that describes how federal housing and community development money is spent. The ConPlan merges five federal programs — the [Community Development Block Grant \(CDBG\)](#), the [HOME Investment Partnerships Program](#), the Emergency Solutions Grants (ESG), the Housing Opportunities for Persons with AIDS (HOPWA) Program, and the [National Housing Trust Fund \(NHTF\)](#) — into one public process and document. States, cities, and urban counties all have to have a ConPlan. Organizers, advocates, and community members can use the ConPlan process to influence how money is spent, including directing it toward social housing.

ConPlans are created every five years and are a framework for the yearly Annual Action Plan and Consolidated Annual Performance Evaluation Report (CAPER), each of which provides organizers, advocates, and community members with many opportunities to influence how money is spent.

The ConPlan process and its public participation requirements have a lot of potential to allow communities to define their own needs and priorities. However, in practice, public participation requirements can be ignored by local governments. To best use the ConPlan process to further social housing goals, organizers, advocates, and community members should be as familiar as possible with the ConPlan process so they are best able to use it to their advantage.

How the ConPlan Can Be Used to Fund Social Housing

For more information, refer to the explainers on the [HOME Program](#), the [Housing Trust Fund](#), and [CDBG](#).

The ConPlan (or more specifically, the grant programs bundled together in the ConPlan) can be used for the following purposes:

- Purchasing (or converting) new affordable housing units

- Rehabilitating existing affordable housing units
- Assisting low-income homebuyers
- Short-term rental assistance
- Constructing new housing units
- Acquiring land
- Testing and abatement of environmental hazards (specifically lead paint)

ConPlan Structure

The ConPlan consists of four sections. While both states and local governments have to make their own ConPlans, states usually have slightly fewer requirements.

1. **A Housing and Community Development Needs Analysis**, which estimates housing needs (by income category, family type, housing cost burden, projected Section 8 voucher needs, projected supportive housing needs, and more) for the next five years. While census data has to be used in the needs analysis, any other “reliable source” can be used as well.
2. **A Housing Market Analysis**, which describes (among other things) the supply, demand, cost, and condition of housing in the area
3. **A Five-Year Strategic Plan**, which describes general priorities for allocating federal money by specific categories (including affordable housing, barriers to affordable housing, public housing, and homelessness).
4. **An Annual Action Plan**, which describes how the goals from the Strategic Plan will be accomplished that year. The Annual Action Plan lists all the money that the jurisdiction will be receiving from the federal government (as well as other state, local, and/or private funds), what the jurisdiction plans to spend the money on, and target dates for when the money will be spent. The Annual Action Plan must also detail:
 - a. Goals for providing affordable housing, including the number of households that will be helped.¹
 - b. Plans to address public housing needs and encourage public housing residents to become more involved.²
 - c. Plans to address shelter and transitional housing needs of unhoused people.³

¹ §91.220(g).

² §91.220(h).

³ §91.220(i).

- d. Plans to remove or mitigate barriers to affordable housing,⁴ incentivize affordable housing, mitigate lead-based paint hazards, and reduce the number of families in poverty.⁵

Local Advocacy Strategies/Opportunities

Citizen Participation Plan

HUD requires jurisdictions to create a Citizen Participation Plan that outlines how they will solicit public input.⁶ The Citizen Participation Plan is supposed to encourage low-income people, “minorities,” “non-English speaking persons,” and “persons with disabilities” to participate in the ConPlan process.

ConPlan/Annual Action Plan Development

Check your local jurisdiction to see when the next ConPlan is due. Before a jurisdiction publishes their ConPlan or Annual Action Plan, they have to hold at least one public hearing to gather the community’s thoughts about their housing and community development needs (they have to hold at least **two** hearings per year, but only one has to be before the draft ConPlan is published). The Citizen Participation Plan should describe how the jurisdiction will publicize this meeting.

Community organizers and their legal services allies can provide information regarding the community’s housing needs that the jurisdiction may not get otherwise. Community organizers can help turn member-leaders out to the meetings to share their stories. Legal services providers can help by providing information (if they have it) on the number of evictions in the community, statistics on corporate ownership of housing, the affordability and habitability of available housing, and other issues that speak to the need for social housing. Any type of research or information can be submitted for consideration. If the information isn’t available, community members can demand that the jurisdiction obtain it themselves.

Proposed ConPlan/Annual Action Plan

Once the draft ConPlan is ready, jurisdictions need to put a notice in the newspaper announcing it. Copies of the ConPlan are supposed to be available in public places (like libraries) and a “reasonable” number of copies are supposed to be provided for free upon request. The public has 30 days to review and comment on the proposed

⁴ §91.220(j).

⁵ §91.220(k).

⁶ §91.105(a).

ConPlan and/or Annual Action Plan. A description of this, including what newspaper the notice will be published in, where the copies of the ConPlan will be available, and how the public can make comments, should be in the Citizen Participation Plan.

Jurisdictions are required to consider public comments from the proposed plan when drafting the final ConPlan or Annual Action Plan. In the final plan, jurisdictions are supposed to attach a summary of the comments and explain why any suggestions weren't used.

HUD can reject a ConPlan or Annual Action Plan, for example if a jurisdiction did not follow public participation requirements. If you think that a ConPlan should not be approved, you can file a complaint with HUD. Instructions on how to do this should be described in your jurisdiction's Citizen Participation Plan.

CAPER

Every year, jurisdictions have to evaluate their performance on their Annual Action Plan through the CAPER. There are public participation requirements for the CAPER — jurisdictions need to provide “reasonable notice” that it has been completed and the report has to be made available to the community for comment — but the comment period is only 15 days.

Amendments

If a jurisdiction wants to “substantially” amend their ConPlan, then they need to go through a public participation process similar to the one for the CAPER but with a 30-day public comment period. However, HUD allows the jurisdictions themselves to define what is a “substantial amendment.”

Resources

- [Consolidated Planning Process, Ed Gramlich, NLIHC](#)
- [Affordable Housing Manual, Chapter 11: Consolidated Plan, WCLP](#)