

Citizen Participation Plan

Introduction

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes of formula grant programs. The Community Development Block Grants (CDBG) planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining the affordable housing stock, increasing the availability of permanent affordable housing for low-income households without discrimination, and / or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public facilities; deconcentrating housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources. Expanding economic opportunities can involve creation of accessible jobs, providing access resources for community development, and assisting low-income persons to achieve self-sufficiency.

The Consolidated Plan is a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans, and submitting annual performance reports. These three parts are intended to furnish the framework whereby the City of Cuyahoga Falls can identify its housing, homeless, community, and economic development needs, identify resources that will be tapped and actions to be taken that will address the needs, as well as look back and evaluate the City's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Cuyahoga Falls, particularly persons of low- and moderate income, persons living in blighted areas, units of local government, housing agencies and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the Consolidated Planning process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed, and methods for citizens to offer the City of Cuyahoga Falls assistance and guidance in the formulation of the Consolidated Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules regarding the Consolidated Plan for the Community Development Block Grant (CDBG) Program. In the City of Cuyahoga Falls, the Community Development

Department administers CDBG funds. The Community Development Department is the lead agency for developing the Consolidated Plan.

Encouraging Citizen Participation

The Consolidated Plan is designed to enumerate the City of Cuyahoga Falls' overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low- and moderate-income persons.

Interested groups and individuals are encouraged to provide input into all aspects of Cuyahoga Falls' Consolidated Planning activities, from assessing needs to setting priorities through performance evaluation. By following the CPP, numerous opportunities for citizens to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to residents will occur.

The City of Cuyahoga Falls is committed to keeping all interested groups and individuals informed of each phase of the Consolidated Planning process and of activities being proposed. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated throughout the City of Cuyahoga Falls.

Public Hearings and Meetings

The City will conduct at least two (2) public hearings to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the Consolidated Planning process. At least one will occur prior to development of the Draft Plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one more will occur after the Draft Plan has been released for public review, allowing interested parties an opportunity to review the strategies and how they were developed, designed, and presented.

Information about the time, location and subject of each hearing will be provided to citizens at least fourteen (14) calendar days in advance through adopted public notice and outreach procedures. This notification will be disseminated to local governments and other interested parties. Public notification of the hearings will be published in the local newspaper. Community Development Department staff may also attend other meetings and conventions in the City of Cuyahoga Falls throughout the year, thereby providing an opportunity for additional public information on the Consolidated Plan.

Every effort will be made to ensure the public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected

by proposed activities can attend. If written notice is given at least seven (7) days before a hearing date, the City of Cuyahoga Falls will provide appropriate materials, equipment, and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and / or hearing impairments. If requested, interpreters can be provided at public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the Consolidated Planning process will conform to applicable Ohio open meeting laws.

However, the Community Development staff may, at their discretion, actively solicit input on housing and community development issues during the year with other forums, town hall meetings and other venues, as they may present themselves.

The CDBG Administrator will publish the Draft Consolidated Plan for public review in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance the City of Cuyahoga Falls expects to receive; and,
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

A summary of the Draft Plan will be published in a newspaper of general circulation at the beginning of the public comment period. The summary will describe the contents and purpose of the Consolidated Plan (including a summary of specific objectives) and include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are among the locations where copies of the public comment Draft Plan will be made available to inspections:

- Community Development Department located at 2310 Second Street
- City of Cuyahoga Falls' website at www.cityofcf.com

Public Comments on the Draft Consolidated Plan and Annual Action Plans

The City of Cuyahoga Falls' Community Development Department, as lead agency, will receive comments from citizens on its Draft Plan for a period not less than thirty (30) days prior to submission of the Consolidated Plan or Annual Action Plans to HUD.

All comments or views of citizens received in writing during the thirty (30) day comment period will be considered in preparing the final Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final Consolidated Plan.

Public Notice and Outreach

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the Consolidated Planning process.

As the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, the City will utilize advertisement notices in newspapers of general circulation. Such notices will be published at least fourteen (14) calendar days prior to public hearings. All notices will be written in plain, simple language and direct efforts will be undertaken to publish and / or post information at locations that will elicit maximum low- and moderate-income and minority participation.

Public education and outreach will be facilitated using Public Advertisements that describe the Consolidated Planning process, opportunities for citizen participation and available funding through the CDBG program.

Technical Assistance

Groups or individuals interested in obtaining technical assistance to develop project proposals or applying for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact the Community Development Department. Such assistance may be of particular use to community development organizations, non-profit service providers, and for-profit and non-profit housing development groups that serve or represent persons of low- and moderate-income.

Amendments to the Consolidated Plan

Pursuant to HUD regulations, an amendment to the Consolidated Plan is required whenever the Jurisdiction determines to:

- Substantially change the allocation priorities or its method of distributing CDBG funds; and,
- Utilize CDBG funds to carry out activities not previously described in the Action Plan; and,
- Change the purpose, scope, location, or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and / or policies on the allocation of public resources. Substantial amendments to the Consolidated Plan are, in addition, subject to a formal citizen participation process. Notice and the opportunity to comment will be given to citizens through public notices in local newspapers and other appropriate means, such as direct mail or public meetings. A public comment period not less than thirty (30) days will be provided prior to implementing any substantial amendment to the Consolidated Plan. The Community Development Department will prepare a summary of all comments received in

writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be attached to the substantial amendment, which will be available to the public and submitted to HUD.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment to the Consolidated Plan, the City will conduct a public hearing. This hearing will follow a comment period of no less than thirty (30) days, where the proposed substantially amended Consolidated Plan will be made available to interested parties. Citizens will be informed of the public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper which is circulated city-wide.

Citizen Participation Plan in the Event of a Declared State of Emergency

In the event of a substantial amendment to the Consolidated Plan including the Annual Plan due to a declared State of Emergency, the City will conduct a virtual public hearing. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. Citizens will be informed of the virtual public hearing through newspaper notification prior to the hearing, and the notice will appear in at least one newspaper which is circulated city-wide.

In-person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gathering for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Consideration of Public Comments on the Substantially Amended Plan

In the event of substantial amendments to the Consolidated Plan, the City will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing or at public hearings. In the event of a virtual public hearing, comments will be received in writing through City of Cuyahoga Falls social media sites. A summary of the written and public hearing comments on the substantial amendments will be included in the final Consolidated Plan. Also included in the final Consolidated Plan will be a summary of all comments not accepted and their reasons for dismissal.

Changes in Federal Funding Level

Any changes in federal funding level after the Consolidated Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

Standard Amendments

"Standard amendments" are those that are not considered substantial in nature and pertain chiefly to minor administrative modifications of the programs. Thus, they do not require in-depth citizen participation.

Consolidated Annual Performance Report

Performance reports on programs covered by the Consolidated Plan are to be prepared by the Development Department for annual submission to HUD within ninety (90) days of the start of each program year. Draft performance reports will be made available upon written request. The draft performance report will be available for comment for no less than fifteen (15) days, and any public comments received in writing will be reported in an addendum to the final performance report.

Access to Records

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports.

Complaints and Grievances

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the Consolidated Plan. Complaints should be in writing, specific in their content, and include facts to support allegations. The following are considered to constitute complaints to which a response letter is due:

- The administering agency has purportedly violated a provision of this Citizen Participation Plan; and,
- The administering agency has purportedly violated a provision of federal CDBG program regulations; and,
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud, or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and / or public hearings. All public comments, including complaints and grievances, made either orally or in writing within the thirty (30) day public comment period, will be included in the final Consolidated Plan. Such complaints or grievances shall be directed to the Consolidated Plan representative, the City's Assistant to the Mayor for Community Development.

Timely Response to Complaints or Grievances

Upon receipt of a written complaint, the Director for Community Development and/or Law Director shall respond to the complainant within fifteen (15) calendar days and maintain a copy of all related correspondence, which will be subject to Community Development Department review.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

Activities Exempt from Substantial Amendment Citizen Participation Requirements

Urgent Needs

It may be necessary to amend the Consolidated Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and / or the reprogramming of funds including canceling activities to meet community development needs that are urgent. Therefore, the City of Cuyahoga Falls, acting through the Community Development Department may utilize its CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development urgent needs, an activity will alleviate existing conditions that the City of Cuyahoga Falls certifies:

- Pose a serious and immediate threat to the health and welfare of the community; and,
- Are of recent origin or recently became urgent; and,
- The City and the Community Development Department are unable to finance the activity on their own; and,
- Other resources of funding are not available to carry out the activity.

A condition will generally, be considered of recent origin if it is developed or became critical within eighteen (18) months preceding the Community Development Department's certification.

Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the Community Development Department at development@cityofcf.com or by calling 330-971-8135. The City will make the Citizen Participation Plan available in an alternative format accessible to persons with disabilities.