



# CITIZEN PARTICIPATION PLAN

City of Bloomington & Town of Normal



NOVEMBER 2018  
AMENDED APRIL 2020





## **PURPOSE**

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The City of Bloomington and Town of Normal receive annual entitlement funding from the U.S. Department of Housing and Urban Development (HUD). The City and Town are required by law to adopt a detailed Citizen Participation Plan containing policies and procedures for stakeholder consultation and public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG) funds.

The City of Bloomington and Town of Normal, herein after referred to as the Entitlement Communities, are committed to increasing public participation and the empowerment of residents—especially those of low- and moderate-income—to shape the future of the region.

The Citizen Participation Plan will be made available to the public via the Entitlement Community's website and physical office locations.

## Funding Source

The Community Development Block Grant (CDBG) Entitlement Program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-530.1 et seq.<sup>1</sup>

## Regulatory Requirements

This Citizen Participation Plan has been developed in accordance with the applicable federal regulation of 24 CFR Part 91.05: Citizen Participation Plan; Local Governments.

## Advisory Body

The Regional Housing Advisory Committee of McLean County was established in April 2018 to address housing issues regionally and comprehensively for people of all ages, incomes and abilities. Three subcommittees comprise the Committee, addressing distinct yet related housing issues in the community. Those issues include increasing the inventory of safe, high quality, affordable and supportive housing particularly to lower income groups, seniors and persons with disabilities.

The Intergovernmental Staff Committee is responsible for determining the priorities and policies of the Regional Housing Advisory Committee with input from group membership, carrying out the activities of the Advisory Body and acting as the conduit between local housing efforts and state and federal housing agencies. Under McLean County Regional Planning Commission (MCRPC) leadership, the staff committee will prepare a regional Consolidated Plan for the Bloomington and Normal CDBG programs. Committee members represent the following organizations that evaluate and implement the recommendations of the advisory groups:

- McLean County Regional Planning Commission
- City of Bloomington
- Town of Normal
- Bloomington Housing Authority
- Providing Access to Help (PATH)
- McLean County Behavioral Health Coordinating Council

The Committee will coordinate its work with the projects and priorities established in the Consolidated Plan.

## Outreach and Citizen Engagement Strategy

This Citizen Participation Plan defines a process for meaningful public input regarding CDBG-funded activities and priorities. Two common threads run through this public outreach approach, 1) to move the Entitlement Communities' work into the places and spaces where people gather, work and learn, and 2) to cooperate with our participants and partners in development of a network of contacts that can substantially expand our outreach capabilities.

The Entitlement Communities will provide for and encourage genuine involvement by low- and moderate-income residents at all stages of the process, including: identifying needs; setting priorities among these needs; deciding how much money should be allocated to each high-priority need; suggesting the types of programs to meet high-priority needs; and overseeing the way in which the programs are carried out.

<sup>1</sup> [www.hudexchange.info/programs/cdbg-entitlement](http://www.hudexchange.info/programs/cdbg-entitlement)

## OBJECTIVES FOR ENGAGEMENT

1

**Understand the demographics** of the Entitlement Community's low- and moderate-income population and determine what cultural, economic, language-based or accessibility barriers exist to public participation.

2

**Seek broad citizen input** with specific emphasis on participation by low- and moderate- income persons and by those living in areas where federal funds are proposed to be used, and/or on low- and moderate-income neighborhoods. Low- and moderate-income neighborhoods are areas where at least 51% of households have incomes at or below 80% of the area median income (AMI).

3

**Hold public meetings, events, or activities** in locations that are accessible to all area stakeholders and members of the community, including but not limited to members of ethnic, racial, or faith-based minority groups, people with limited economic resources, people with disabilities, people of any age or educational attainment, and people with limited proficiency in understanding or speaking English.

4

**Consult** with local and regional institutions including Continuums of Care, businesses, nonprofit organizations, philanthropic organizations, and community- and faith-based organizations. Consultations will also include broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.

5

**Include the Public Housing Authority (PHA)** in planning for programs and projects related to its developments so that the PHA can make this information available at the annual hearing for the PHA plan.

6

**Encourage, in conjunction with the PHA, the participation** of residents of public and assisted housing developments along with other low-income residents of targeted revitalization areas in which the developments are located.

7

**Provide methods** for two-way communication, information and input from populations and persons who are less likely to attend meetings.

8

**Convey the information** in various formats to reach all stakeholder groups to the extent possible, using direct and network-based means of communication.

## Opportunities for Participation

Each of the Entitlement Communities will solicit input from residents and stakeholders at public hearings held at least twice annually on programming and operations.

In addition to a minimum of two public hearings, the following outreach/engagement processes may be utilized:

- Public meetings
- Open houses
- Focus groups
- Surveys
- Innovative tools and technologies to gather input from various demographic groups
- Personal outreach by staff
- Services for persons with disabilities\*

\* Notices of opportunities for public involvement include contact information for people needing any form of accommodations.



## Outreach Parameters

### Identification of Stakeholders

The term stakeholder refers to “an individual, group, or organization, who may affect, be affected by, or perceive itself to be affected by a decision, activity, or outcome of a project.”<sup>2</sup> Stakeholders of Community Development Block Grant (CDBG) activities include but are not limited to the following:

- Board of Directors/Trustees, etc.—the governing board of an affected agency or other entity
- Local and regional jurisdictions and other government stakeholders
- Low- and moderate-income persons, and those living in low- to moderate-income neighborhoods
- Minorities and non-English speaking persons
- Persons with disabilities
- Partner agencies
- Continuum of Care and non-profits
- Behavioral Health Council and wellness community
- Bloomington Housing Authority
- Businesses, community- and faith-based organizations
- Broadband Internet service providers and agencies engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management and transportation planning and programming

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<sup>2</sup> Project Management Institute, 2013

## Strategic Plans

There shall be advanced public notice and reasonable opportunity to comment on the proposed Annual Action Plan, Five-Year Consolidated Plan, Analysis of Impediments to Fair Housing and any Substantial Amendments as applicable.

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### Public Comment/Public Hearing Process

The entitlement communities shall utilize public comment periods and public hearings to solicit meaningful citizen involvement in the development of the aforementioned strategic plans.

The published comment period pertaining to the Annual Action Plan, Consolidated Plan and Substantial Amendments shall be a minimum of 30 days. During this time, the public will have the opportunity to submit comments orally, in writing or via electronic methods as directed in the notice. Draft copies of the documents will be available via the same channels mentioned above. In addition, a hard copy of the draft documents will be maintained at the Entitlement Community's offices and made available for public review as requested. A reasonable number of free copies of the draft documents will also be provided to those residents and groups upon request. The draft documents will be made available in a form accessible to persons with disabilities, upon request.

The Entitlement Communities will also make available the amount of assistance they are expected to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income, prior to the hearing for the Consolidated Plan and Annual Action Plans.

Prior to the public comment period for a Consolidated Plan and/or Annual Action Plan, at least one public hearing will occur. A formal notice of a public hearing will be published in at least one local newspaper with general daily circulation at least two (2) weeks in advance. The same notice will be published to the Entitlement Community's website, newsletters and social media. The notice will also be sent to known stakeholder groups and partner organizations to further publicize via linkage to their respective websites, newsletters and social media.

Each entitlement community will conduct a minimum of two public hearings per year. Together the hearings will cover community development and housing needs, development of proposed activities and a review of program performance. One public hearing will focus on community development and housing needs and the proposed CDBG activities for the coming fiscal year. A second public hearing shall focus on the past year's program performance (Consolidated Annual Performance Evaluation Report). Each of those hearings will be held in their respective entitlement community. At least one hearing will be held in each Entitlement Community before the Consolidated Plan is published for comment. All public hearings will be held at locations accessible to people with disabilities, and provisions will be made for people with disabilities when requests are made at least five working days prior to a hearing. Translators will be provided for people who do not speak English or are hearing disabled, when requests are made at least five working days prior to a hearing. Public hearings will be held at locations and times that are convenient and accessible to potential or actual beneficiaries. (Meeting times are generally held after 5:00 p.m.; however, times may be varied, dependent upon the "targeted" audience.)

A summary of comments received, identifying the comment source and content, as well as the Entitlement Community's responses (including those comments or views not accepted and the reasons therefor) will be included in the final document submittal to HUD as required.

### Consolidated Annual Performance and Evaluation Report (CAPER)

Within 90 days of the close of each program year, the Entitlement Communities must send to the Department of Housing and Urban Development (HUD) a Consolidated Annual Performance and Evaluation Report (CAPER).

Each CAPER will include the amount of assistance the Entitlement Community actually received (including grant funds and program income) and the range of activities that were undertaken, including the actual amount that benefited persons of low- and moderate-income where applicable.

The Entitlement Communities will give reasonable notice that a CAPER is available for public review and comment.

A notice of availability of draft copies of the document will be published via the same methods described in the 'Public Hearing Process'. The published comment period for the CAPER shall be a minimum of 15 days. There will be a public hearing regarding the Consolidated Annual Performance and Evaluation Report. A formal notice of a public hearing will be published in at least one local newspaper with general daily circulation at least two (2) weeks in advance. The same notice will be published to the Entitlement Community's website, newsletters and social media. The notice will also be sent to known stakeholder groups and partner organizations to further publicize via linkage to their respective websites, newsletters and social media.

In preparing a Consolidated Annual Performance and Evaluation Report for submission to HUD, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing. The CAPER sent to HUD will have a section that presents all comments, plus explanations why any comments were not accepted.

## **Amendments**

The Entitlement Communities will make all Substantial Amendments available for public review and comment.

A Substantial Amendment shall be required if any one of the following criteria applies:

1. A change in the use of CDBG money from one activity to another, in excess of \$150,000.00.
2. Activities proposed to be added or deleted from the plan.
3. A change in the purpose, scope, location, or type of beneficiaries of an activity.
4. A change in priorities for allocating funds.

In case of a Substantial Amendment, the same notification, comment processes as previously outlined on page 6 will be followed.

In preparing a final Substantial Amendment, careful consideration will be given to all comments and views expressed by the public, whether given as verbal testimony at the public hearing or submitted in writing during the review and comment period. The final Substantial Amendment will have a section that presents all comments, plus explanations why any comments were not accepted.

## **Minimizing Displacement**

The Entitlement Communities will work to minimize all displacement of persons and businesses where feasible. In instances where temporary or permanent displacement is necessary, the Entitlement Communities will provide technical and monetary assistance for relocation purposes as required and cost eligible under the applicable federal regulations.

## **Access to Records**

It is the Entitlement Community's intention to provide reasonable and timely access to information and records relating to the proposed and actual use of CDBG funds. Records on past usage of CDBG funds will be maintained for the previous five plan years.

## **Technical Assistance**

Reasonable levels of technical assistance shall be provided to any resident or group seeking information about program eligibility and requirements. Such assistance shall include help with any program application process. The provision of funding is not considered a reasonable level of technical assistance.

## **Complaints**

The applicable Entitlement Community will provide a timely, substantive written response to every written complaint within 15 business days.

# CARES Act Amendment

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## Purpose

The City of Bloomington and Town of Normal will receive additional Community Development Block Grant (CDBG) funding from the US Department of Housing and Urban Development (HUD) through the Coronavirus Aid, Relief and Economic Security Act (C.A.R.E.S. Act). The C.A.R.E.S. Act funding is commonly referred to as CDBG-CV (Coronavirus). The C.A.R.E.S. Act provides flexibilities for Entitlement Communities to make it easier to use CDBG and CDBG-CV during Program Years 2019 and 2020. The C.A.R.E.S. Act authorizes HUD to grant waivers and alternative requirements. This amendment to the joint Citizen Participation Plan addresses flexibilities in requirements for Citizen Participation and Public Hearings for 2019 and 2020 CDBG/CDBG-CV funding. The City of Bloomington and Town of Normal have submitted waivers to HUD allowing for the following:

## Citizen Participation

The published comment period pertaining to amendments to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan(s) and Substantial Amendment(s), as they relate to CDBG-CV, shall be a minimum of 5 days. During this time, the public will have an opportunity to submit comments orally, in writing, or via electronic methods, as directed in the notice. Comment periods for more than one of the above documents may run concurrently.

## Public Hearings

Virtual public hearings are allowed under the following circumstances:

- National/local health authorities recommend social distancing and limiting public gatherings for public health reasons;
- 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.

A formal notice of the public hearing will be published in at least one local newspaper with general circulation no less than five days prior to the hearing. The same notice will be published to the Entitlement Community's website, newsletters, and social media. The notice will also be sent to known stakeholder groups and partner organizations to further publicize via linkage to their respective websites, newsletters, and social media.





*In partnership with:*

