

CITIZEN PARTICIPATION PLAN

CITY OF BLOOMINGTON AND TOWN OF NORMAL

Background

The US Department of Housing and Urban Development (HUD) provides annual funding to eligible local municipalities, counties, and states, known as Entitlement Communities, through the Community Development Block Grant (CDBG). CDBG is allocated on a formula basis and must be used to provide decent housing, create suitable living environments, and expand economic opportunities, principally to the benefit of low- and moderate-income (LMI) persons. The CDBG program is authorized under Title 1 of the Housing and Community Development Act of 1974, as amended.

Both the City of Bloomington and Town of Normal, herein after referred to as the Entitlement Communities, receive annual funding from HUD through the CDBG program. Entitlement Communities are required by law to adopt a detailed Citizen Participation Plan containing the policies and procedures for stakeholder consultation and public engagement in the development of the five-year Consolidated Plan, Annual Action Plans, and annual Consolidated Annual Performance Evaluation Report (CAPER). To be most effective, citizen participation and consultation must be an ongoing process. To that end, this Citizen Participation Plan outlines opportunities for citizen engagement at all stages of the funding process.

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. Under McLean County Regional Planning Commission (MCRPC) leadership, the Entitlement Communities each prepared and submitted to HUD their Consolidated Plans with a regional focus for the 2020-2024 Consolidated Plan periods. This process was successful and will continue for future plans.

Introduction

The Citizen Participation Plan has been developed in accordance with the applicable federal regulation of 24 CFR Part 91.105 Citizen Participation; Local Governments. This plan will be reviewed no less than once during each five-year Consolidated Plan period and amended, as necessary, per the policies and procedures outlined within.

Participation by LMI and other Disadvantaged Persons (24 CFR 91.105(a)(2))

It is the policy of the Entitlement Communities to provide equitable access and encourage meaningful participation from all residents of the community. This includes LMI persons, particularly those living in blighted or higher poverty neighborhoods, and areas where CDBG funds are proposed to be used as outlined in the Consolidated Plan. For the purposes of CDBG funding, a resident is considered low-income if their annual household income equals 50% or less of the Area Median Income (AMI) as defined annually by HUD. A person is considered moderate-income if their annual household income is between 51% and 80% of the AMI. Predominately low-to-moderate income areas are defined as any area where at least 51% of the residents have income equal to or below 80% of the AMI for any given year. The determination of whether an area meets the LMI income definition is made by the Entitlement Community at the time a project of area-wide benefit is funded and based on current data provided by HUD.

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The Entitlement Communities also actively encourage participation of minorities or people of color, non-English speaking persons, and persons with differing abilities. Actions to encourage participation shall include wide-spread outreach and public engagement efforts, conducting public meetings in targeted neighborhoods, conducting public hearings during convenient hours, offering meetings and hearings in a hybrid or fully virtual format, when appropriate, translation services of notices and other vital communications in languages other than English, providing language assistance as needed, and providing documents in formats accessible to persons with disabilities upon request.

Participation by Relevant Stakeholders (24 CFR 91.105(a)(2))

The Entitlement Communities will actively encourage participation of local and regional institutions in the process of developing the Consolidated Plan. Such organizations include but are not limited to the following: business and civic organizations, housing developers, housing /homeless service providers, health care organizations, philanthropic organizations, and community-based, faith-based, and other nonprofit organizations. In the process of developing the Consolidated Plan, the Entitlement Communities shall also consult with the Central Illinois County Continuum of Care (McLean County hub), Bloomington Housing Authority, broadband internet service providers and organizations involved with narrowing the digital divide; agencies involved with management of flood prone areas, public land and water resources, and emergency management services.

Outreach Techniques

The Entitlement Communities shall implement a range of public engagement and stakeholder consultation methods such as focus groups, key informant interviews, public meetings, public hearings, electronic and paper-based surveys, social media campaigns and other methods to maximize input from residents and stakeholder groups.

Development of the Consolidated Plan/Annual Action Plan (24 CFR 91.105(b))

Prior to adoption of the Consolidated Plan and each subsequent Annual Action Plan, the Entitlement Communities shall make available to residents and stakeholders:

1. The total amount of assistance expected to be received from HUD;
2. The range of activities that may be undertaken with these funds;
3. The estimated amount of funding that will benefit persons of low-to-moderate income;
4. Plans to minimize displacement of persons, including specifying the type and level of assistance that will be made available to any persons displaced; and
5. When and how this information will be made available to the public.

At least 30 calendar days before the Consolidated Plan/Annual Action Plan is submitted to HUD, the Entitlement Community shall publish a summary of the contents of the Consolidated Plan/Annual Action Plan in a local newspaper of general circulation and inform all citizens of the locations where complete copies of the document will be available, including the Entitlement Community's website. A reasonable number of free copies will be made available to citizens and groups that make such a request.

As described in the Public Comment and Hearings section below, each Entitlement Community will conduct at least one public hearing during the development of the Consolidated Plan and each subsequent Annual Action Plan. The Entitlement Communities shall also provide information on how to

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submit comments and input on the Consolidated Plan/Annual Action Plan. The Entitlement Communities will consider comments or views of residents received in writing or orally at the public hearings when preparing the final Consolidated Plan/Annual Action Plan. A summary of any comments or views, including any comments or views not accepted and the reasons why, shall be included in the final plan.

Consolidated Plan/Annual Action Plan Amendments (24 CFR 91.105(c))

The Entitlement Communities shall amend a Consolidated Plan/Annual Action Plan whenever one of the following decisions have been made:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To add a new goal or remove a goal previously described in the plan; or
3. To change the purpose, scope, location, or beneficiaries of a project.

Consolidated Plan/Annual Action Plan amendments that do not meet the Substantial Amendment, as defined below, will be updated in paper copies of the Consolidated Plan/Annual Action Plan made available in the locations specified under “Public Access” below and on the website. Additionally, the changes will be described in the CAPER.

Substantial Amendment (24 CFR 91.105(c))

Criteria for which a change would constitute a substantial change, and thereby require formal adoption of an amendment to the Consolidated Plan/Annual Action Plan, would include one or more of the following conditions:

1. Increasing or decreasing funding levels for a given project by \$100,000 or more than the previously adopted amount;
2. Modification of a project to address a different national objective; or
3. Changes in use of funds from one eligible category to another.

This list represents the Entitlement Community’s criteria for determining what constitutes a substantial amendment and, therefore, subject to the Citizen participation process.

Substantial changes shall be advertised in the local newspapers notifying citizens that copies of the changes are available at the Entitlement Community’s office(s) and website for review and comment prior to adoption. A public comment period of not less than 30 calendar days shall be allowed prior to implementation of the substantial amendment, which will align with the process set forth in the Public Comment and Hearing section below. Written comments must be submitted to the staff identified in public notice. The Entitlement Community will consider any comments or views of residents received in writing or orally at the public hearing prior to adoption of the substantial amendment. A summary of comments or views, including any comments or views not accepted and the reasons why, shall be attached to the substantial amendment.

The Entitlement Community will ensure that any amendment to the Consolidated Plan/Annual Action Plan is consistent with its certification to Affirmatively Further Fair Housing and the Analysis of Impediments to Fair Housing.

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In the event of a presidentially declared disaster, any CDBG funds reallocated to address the disaster will be considered a non-substantial amendment if the reallocation does not exceed 50% of the entitlement community annual allocation for that program year.

Citizen Participation Plan Amendments (24 CFR 91.105(c))

The Citizen Participation Plan shall be reviewed no less than once during each five-year Consolidated Plan Period. The Entitlement communities shall amend the Citizen Participation Plan whenever one of the following changes have been made:

1. Any change to the Consolidated Plan/Annual Action Plan Amendment criteria as outlined above; or
2. A change in the minimum number of days for public notice or public comment period.

This list represents the Entitlement Community's criteria for determining what constitutes a substantial amendment and, therefore, subject to the Citizen participation process.

Substantial changes shall be advertised in the local newspapers notifying citizens that copies of the changes are available at the Entitlement Community's office(s) and website for review and comment prior to adoption. A public comment period of not less than 30 calendar days shall be allowed prior to implementation of the substantial amendment, which will align with the process set forth in the Public Comment and Hearing section below. Written comments must be submitted to the staff identified in public notice. The Entitlement Community will consider any comments or views of residents received in writing or orally at the public hearing prior to adoption of the substantial amendment. A summary of comments or views, including any comments or views not accepted and the reasons why, shall be attached to the substantial amendment.

Citizen Participation Plan amendments that do not meet the Substantial Amendment threshold will be updated in copies of the Citizen Participation Plan and website. Additionally, the changes will be described in the CAPER.

Performance Reports (24 CFR 91.105(d))

Each Entitlement Community must submit an annual performance report (CAPER) to HUD within 90 calendar days of the end of the program year. The Entitlement Communities shall invite and encourage all citizens and stakeholder organizations to assess and submit comments on all aspects of performance in meeting the Consolidated Plan/Annual Action Plan goals and objectives. The Entitlement Community will provide notice in local newspapers on the opportunity to comment on the report for a period of not less than 15 calendar days prior to its submission to HUD. All comments received in writing or orally will be considered in preparing the final CAPER. A summary of all comments or views shall be submitted as part of the report to HUD. The Entitlement Communities will provide copies of the performance report at the Entitlement Community's office(s) and on the website.

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Reasonable and Timely Notice (24 CFR 91.105(f))

Entitlement Communities must provide residents of the community with reasonable and timely access. Notices of all public hearings shall be widely advertised by placing ads in local newspapers and on the Entitlement Community's website not less than 15 calendar days prior to each public hearing. All notices of public hearings shall indicate the location, date and time of the meeting, and the topics to be considered.

All hearings will be held at times and in locations convenient to beneficiaries and allow for broad participation from all community members. Hearings will be conducted in ADA compliance facilities. Reasonable accommodations will be provided for non-English speaking and physically-, visually, and hearing-impaired individuals, as appropriate. Individuals with impairments shall request accommodations a minimum of 5 business days' notice prior to the public hearing date.

Virtual Public Hearings

In the event of an unforeseen and unpreventable event that renders in-person public gatherings impossible or inadvisable, such as a natural disaster or public health emergency, public hearings may be held as a virtual hearing. Hearing formats may include webinars, webcasts, telecasts, radio, or audio broadcasts, or other virtual communication tools as appropriate for the meeting format. Virtual hearings must provide, at a minimum, an opportunity for citizens to publicly ask questions and for the presenter or public officials to make public response. All questions and responses will be documented, either in written form, such as meeting minutes or chat scripts, or recorded, or as otherwise appropriate for the meeting format. Virtual public hearings will be publicly noticed, and in the event the traditional noticing tools are unavailable or will not effectively reach the public, alternative public noticing efforts will be made and documented.

Disaster Response and Recovery

HUD CPD Notice 17-06: Using CPD funds for Disaster Response and Recovery directs entitlement communities to be prepared to respond quickly to a disaster by ensuring that the possible use of federal funds for disaster response is included in the Citizen Participation Plan, Consolidated Plan, and Annual Action Plan.

Final Plan Approval

The City of Bloomington and Town of Normal Councils shall approve and adopt the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, and any amendments to these plans prior to submission to HUD for final approval.

Public Access to Records (24 CFR 91.105(h))

Each Entitlement Community shall provide residents, public agencies, and other interested parties with access to the records listed below at any time during normal business hours. Materials shall also be provided in a form accessible to persons with different abilities or limited English proficiency, upon request.

1. Citizen Participation Plan;

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2. Consolidated Plan/Annual Action Plans, including any substantial amendments;
3. Consolidated Annual Performance Evaluation Report (CAPER); and
4. Analysis of Impediments to Fair Housing.

The above documents will be posted to each municipality's website. Paper copies can be viewed at the following locations:

Bloomington

Economic and Community Development Department, 115 E. Washington St., Bloomington
City Clerk, 115 E. Washington St., Bloomington
Bloomington Public Library, 205 E. Olive St., Bloomington

Normal

Inspections and Planning Department, 1 Uptown Circle, 2nd Floor, Normal
Town Clerk, 11 Uptown Circle, 2nd Floor, Normal
Normal Public Library, 206 W. College Ave, Normal

Records on past usage of CDBG funds will be maintained for the previous five plan years.

Waivers

All of the requirements of this Citizen Participation Plan are subject to change in the event of guidance or waivers from HUD. In the event that HUD issues guidance or waivers that affect citizen participation in the planning process, the Entitlement Communities will attempt to provide as much notice as possible while still complying with the guidance or waiver received from HUD.

Anti-Displacement

For all CDBG projects, the Entitlement Communities will attempt to avoid any citizen or business displacement where feasible. In the event that an Entitlement Community undertakes a project with federal funding that would involve displacement, procedures identified in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, will be followed.

Technical Assistance (24 CFR 91.105(i))

Reasonable levels of technical assistance shall be provided throughout the Consolidated Plan/Annual Action Plan process. Such access shall include help with any program application process. The provision of funding alone is not considered a reasonable level of technical assistance. Likewise, providing technical assistance does not guarantee assistance.

Complaints (24 CFR 91.105(j))

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