APPENDIX 4.

CITIZEN PARTICIPATION PLAN

CITY OF ROCKFORD
DEPARTMENT OF COMMUNITY DEVELOPMENT

CITY OF ROCKFORD
COMMUNITY DEVELOPMENT PROGRAMS
CITIZEN PARTICPATION PLAN

Overview

The administration of all Community Development Programs is a function of the Community Development Department granted through a policy directive from the Rockford City Council. Even though the elected City officials have unrestricted responsibility and authority for these Community Development Programs, the City recognizes citizen involvement in the decision making process is of greater benefit to all parties in the development and implementation of each program's goals and objectives.

In order to provide citizens with opportunities to participate in an advisory role in planning, implementing and assessing the Community Development Programs, the City will provide adequate information to citizens; hold public hearings to obtain views of the citizens, and provide citizens an opportunity to comment on the City's community development performance. The Citizen Participation Plan was developed as a mechanism to address those concerns.

Integral to the Citizen Participation Plan is the establishment of the Citizen Participation Committee (CPC). The Committee can be viewed as a formal/structured means of receiving and disseminating information for citizen action and input toward Community Development plans, programs, and activities. The role of the Committee and its composition will be presented later.

Purpose

The purpose of the Citizen Participation Plan is to identify the process, procedures and policies to be followed by the City of Rockford regarding the involvement of citizens in its Community Development Programs (CDP). While the Plan is designed to meet the federal regulations associated with each, it has been expanded beyond those requirements to further enhance citizen participation. Nothing in the Plan, however, shall be construed to restrict the responsibility and authority of the City officials for the development of the application and the execution of its Community Development Programs.

This plan outlines the means by which citizens can actively participate in the CDP process. In all instances, citizen participation will be conducted in an open manner, with freedom of access for all interested persons. Citizens will be provided adequate and timely information that enables them to be meaningfully involved in the CDBG program.

Participation Emphasis

All citizens, particularly low and moderate income persons and persons/residents of blighted neighborhoods, shall be encouraged to submit views and proposals regarding the City's Community Development Programs.

Additionally, minorities and non English speaking persons as well as mobility, visually and hearing impaired persons will be encouraged to participate. The staff of the Community Development Department will be responsible for providing necessary technical assistance to groups and/or individuals that request assistance in developing proposals and statements of views. Further, staff may assist citizens in organizing neighborhood and project area organizations in carrying out Community Development Program activities.

Citizens may submit their views and proposals, 1) directly to the City via the Department of Community Development; 2) to recognized neighborhood groups/associations, non profit community service organizations; 3) to the Citizen Participation Committee; 4) and/or at public hearings. Timely responses to all proposals will be made, including written responses to written proposals stating the reasons for the action taken by the City on the proposal. The City will make every effort to respond within 30 days of the receipt of the request, unless otherwise designated.

Citizen Participation Committee (CPC)

The CPC will be central to the implementation of the Citizen Participation Plan. The Citizen Participation Committee will be appointed by the Mayor with the consent of the City Council. The Committee will be expected to function as the formal/structured means of receiving and disseminating information for citizen input and action both community wide and at a neighborhood level, toward the planning, implementation and evaluation of community development programs. Additionally, the Committee will be the vehicle to ensure continuity of citizen involvement through all stages of the Community Development Programs.

The Committee will consist of eleven members. Terms of membership shall be as follows: five positions - 3 year terms; six positions - 2 year terms. Members shall serve until their successors are appointed; they resign.

All members of the Committee must be residents of the City of Rockford. Membership is not limited to those who reside in lower income census tracts. However, since most activities are either directed to such areas or benefit residents of such areas, residency is strongly encouraged.

With initial and each subsequent appointment extreme efforts should be taken to reflect representing low to moderate income, minority, and of areas where significant activities are proposed. Additionally, the elderly, persons with disabilities, the business community, and civic groups who are concerned about the program should have representation. Discrimination because of race, creed, color, religion, national origin, sex or income in making appointments is prohibited.

The Mayor will make appointment to the CPC from a list of candidates submitted by the Citizen Participation Committee, ad hoc citizen groups, neighborhood groups, community service organizations serving low to moderate income persons, elderly, and/or persons with disabilities as well as the community at large. Vacancies, expirations and committee replacements shall be made public through the Community Development Department and/or interagency announcements. All members of the CPC shall have

resumes on file which are available for public review if requested.

Although no formal committee structure exists, ad hoc committees will be formed on an as needed basis. Formal recommendations of the CPC will require a majority vote.

The Citizen Participation Committee will minimally be involved in:

Program Development

The CPC will provide advisory input toward decisions affecting priority setting and housing and community development needs identification.

> The Five Year Consolidated Plan and Strategy; the Annual Plan; Special CDP Project reviews; other strategic plans and substantial changes resulting in amending the Annual Plan, dollar allocations and/or targeted population or geographic area.

Performance Assessment

The CPC will be involved in assessing and providing comments regarding the City's community development performance. The formal mechanism for assessing and documenting performance shall be the Consolidated Annual Performance and Evaluation report or CAPER. CPC members will provide input into the preparation of the CAPER prior to submittal to the Planning and Development Committee of the City Council for approval.

Public Hearings and Notices

A minimum of two public hearings will be held throughout the program year. Each of the hearing arrangements and timing will be so as to allow city wide participation including persons with disabilities. Additionally when it is evident a significant number of non English speaking residents will be present arrangements will be made to have an interpreter present. Both public hearing(s) will take place prior to the major yearly application submission. The first hearing will be held to provide a review of the proceeding year's CDP accomplishments and to gain input on what activities should cease, be continued or new ones to be proposed. The second present a plan of activities for the new program year taking into account the input from previous hearing Notice of public hearing will minimally be made via the media.

The purpose of the public hearings will be to make adequate information available to citizens concerning: 1) the amounts of funds available; 2) the range of allowable activities; 3) estimated amount of funds proposed for activities that meet the national objective of benefit to low and moderate income persons; 4) proposed activities likely to result in displacement and plans for minimizing displacement; 5) the types and levels of assistance available to persons displaced by CDP funded activities; 6) the application process; 7) past or last annual assessments of performance; 8) the role of citizens in the application/evaluation process and 9) other important program information. Additionally, the hearing will allow for obtaining of views from citizens on the City's community development needs.

A notice of availability of a proposed plan for public review and comment will be published in the local newspaper(s) prior to the submittal to HUD of the yearly annual plan submission. This notice will outline the 30 day comment period. Comments made by citizens resulting from the publication and the public hearing(s) will be considered at the CPC meeting prior to final submission.

Notice and opportunity for citizen comment on proposed activities not previously described in the Annual Plan and activities which are proposed to be deleted or substantially changed in terms of purpose, scope, location or beneficiaries will be provided. The criteria the City will use to determine what constitutes a substantial change will be increases or decreases in grant dollars or activity dollars that cumulatively totals twenty percent that program year's grant allocation.

The City shall also make copies of the Consolidated Annual Performance and Evaluation Report (CAPER) available to the public for review and comment for the required 15 days. This may be done per publication of the report within local newspapers with a request for comments. A third public hearing may be conducted to receive citizen feedback regarding the CAPER and/or special projects. The availability of the performance and evaluation information will be made known per newspaper publication and will be provided in sufficient time to permit comments prior to submission of the report to the Department of Housing and Urban Development.

Information announcing public hearings and significant events in the Community Development process will be published in the local newspaper(s) at least 3 days prior to the meeting. The notice will contain:

1) Date
2) Time
3) Place
4) Topic(s) to be discussed.

Information can be available on the City of Rockford's web site, at main and neighborhood libraries at same time as newspaper publications.

Nothing in the above shall prevent the City from holding CPC meetings and public hearings concurrently.

Amendments

As specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)], the City of Rockford shall amend the consolidated Plan when it:

- Changes allocation priorities or funds distribution method
- Revises policies, data or goals
- Modifies the purpose, scope, location, beneficiaries or funding of an activity

Substantial Amendments

The City of Rockford has determined that an amendment is substantial when:

- The use of CDBG funds is changed from one eligible activity to another and such changes represent twenty percent of more of the original budget
- A new activity is proposed that is not contained in the annual action plan

The CDP will follow the normal the same public notification for a substantial amendment as is for the regular yearly annual plan submissions.

Standard Amendments

"Standard amendments" are those that are not considered substantial in nature. Thus they do not require in depth citizen participation.

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 have a particular urgency. Therefore, the City of Rockford may utilize CDBG or HOME 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 needs having a particular urgency, an activity will alleviate existing conditions that the City of Rockford certifies:

- Pose a serious and immediate threat to the health and welfare of the community
- Are of recent origin or recently became urgent
- The City is unable to finance the activity on it own
- Other resources of funding are not available to carry out the activity

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the City's certification.

Citizen Participation Records & Information

The Community Development Department will be responsible for the maintenance of records of citizen participation activities. The records will be maintained for each program year for a period of three years after the closing date of the program year. The records will be available for review in the Department's office upon request during normal working hours. Documents to be maintained will include: 1) all mailing and promotional material; 2) records of hearings and meetings; 3) all key documents,

including all prior Annual Plans, letters of approval, grant agreements, the Citizen Participation Plan, performance reports, evaluation reports, other reports required by HUD; 4) copies of regulations and assurances governing the program; 5) documents regarding other important program requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements and relocation provisions.

The availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

Grievance, Complaints and Objections

Any person or group feeling aggrieved in connection with the equal opportunity requirements of the Housing & Community Development Act of 1974 as amended with respect to any portion of the local Community Development Program or any of its project activities shall present those grievances in written form to the Director of the City of Rockford's Department of Community Development. The director will make every effort to provide a written decision on the grievance within 15 working days of a written complaint. If the aggrieved persons feels the decision by the director is not acceptable, they may submit the written complaint to the Mayor of the City of Rockford. The Mayor will attempt to respond in writing within 15 days of receipt of the written complaint.

If the persons submitting the grievance continues to feel unsatisfied, the Department will assist them in pursuing to submit and have their grievance heard by the Department of Housing and Urban Development. The area office, the regional office, and finally the central office will be exhausted in that order. The decision of the central office of the Department of Housing and Urban Development will be final.

A record of each grievance received by the Department's director will be maintained. Included within the record will be:

1) Name of person or persons alleging grievance.
2) Date of receipt.
3) Nature of the grievance.
4) Action taken by the Department.
5) Action taken by the local governing body.
6) Final disposition of the grievance.

Programs currently affected by the CP plan

Community Development Bock Grant (CDBG)
HOME Investment Partnerships (HOME)
American Dream Downpayment Initiative (ADDI)
Emergency Shelter Grant (ESG)
Housing opportunities for Persons with AIDS (HOPWA)