



# **CITIZEN PARTICIPATION PLAN**

## **CITY OF ROCKFORD COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS**

**DRAFT**

Effective December 2020

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**Overview**

The City of Rockford (City) is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) Programs. The CPD Programs awarded to the City are Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG).

The administration of all CPD Programs is a function of the Community and Economic Development Department (CEDD), granted through a policy directive from the City of Rockford City Council. Even though the elected City officials have unrestricted responsibility and authority for these CPD Programs, the City recognizes Rockford 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 Rockford citizens with opportunities to participate in an advisory role in planning, implementing, and assessing the CPD Programs, the City will provide adequate information to the citizens of Rockford, hold public hearings to obtain views, and provide an opportunity to comment on the City's performance. The Citizen Participation Plan was developed as a mechanism to address those concerns.

**Purpose**

The purpose of the Citizen Participation Plan (Plan) is to identify the process, procedures, and policies to be followed by the City regarding the involvement of the citizens of Rockford in its CPD Programs. While the Plan is designed to meet the federal regulations associated with each, it has been expanded beyond those requirements to further enhance the participation of the citizens of Rockford. 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 CPD Programs.

This plan outlines the means by which Rockford citizens can actively participate in the CPD planning process, which includes, but is not limited to, the development of the plans, substantial amendments to the plans, and any performance reports. In all instances, citizen participation will be conducted in an open manner, with freedom of access for all interested persons. Citizens of Rockford will be provided adequate and timely information that enables them to be meaningfully involved in the planning process.

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**Participation**

All residents, particularly low-income residents who are the primary clients for the CPD Programs, public housing, and tenant-based assistance, and all protected classes are encouraged to submit comments, views, and proposals regarding the City's CPD Programs. Protected classes, according to the federal Fair Housing Act, along with the Civil Rights Act of 1968 are as follows: race, color, national origin, religion, sex, disability, and familial status. Familial status refers to households with children, households seeking custody of children, or women who are pregnant. Additional protected classes according to Illinois fair housing law include ancestry, age, military or military discharge status, marital status, protective order status, and sexual orientation.

The City also encourages local and regional public agencies, business, developers, community and faith based organizations, and other interested parties to participate.

All comments resulting from a publication and/or the public hearing(s) will be considered by the City prior to final submission of any plan or report.

CEDD is required to provide for technical assistance to groups representative of lower income residents that request such assistance in developing proposals for funding assistance under the consolidated plan.

CEDD staff is available for questions and comments regarding CPD documents and may be reached by telephone at 779-348-7162 or in person at City of Rockford City Hall, 425 E State St, 2nd Floor - Community & Economic Development Department.

**Access to Information**

Residents, public agencies, and other interested parties, including those most affected, will have the opportunity to receive information, review, and submit comments on any proposed submission concerning the CPD programs. This includes, but is not limited to, budget; i.e., funding amounts and activities to be undertaken. The City must follow the Uniform Relocation Act of 1970, and therefore, intends to minimize displacement of persons and to assist any persons displaced when developing and carrying out budgets and plans.

The City intends to ensure all adopted documents are accessible to all. Therefore, they will be available via the City's website at [www.Rockfordil.gov](http://www.Rockfordil.gov). Upon request, the CEDD will make reasonable accommodations for residents unable to view via website.

CEDD shall maintain records to demonstrate compliance with the Citizen Participation Plan. The availability of these records and information shall be consistent with applicable State and local laws regarding personal privacy and obligations of confidentiality.

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**Amendments**

Standard Amendment:

The City shall amend its approved plan as specified in CDBG regulations [Title 24 of the Code of Federal Regulations, Part 91.505(a)]. Therefore, amendments will be made whenever the City makes one of the following decisions:

1. A change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the applicable 5-year consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), which is not previously described in the action plan; or
3. A change in the purpose, scope, location, or beneficiaries of an activity.

The amendments listed above are considered “standard” and do not require in-depth citizen participation.

Substantial Amendment:

A “Substantial Amendment” is one that requires Citizen Participation as defined herein. Criteria for substantial amendments are as follows:

1. Proposed activities not previously described in the applicable 5-year consolidated plan.
2. Increases or decreases in grant dollars or activity dollars that cumulatively totals thirty (30) percent of that program year’s grant allocation, and as amended (i.e., the Annual Action Plan).

Amendments using National Objective of Urgent Need:

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. A substantial amendment does not include amendments to meet this National Objective of Urgent Need. Therefore, the CEDD 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 its own
- Other resources of funding are not available to carry out the activity

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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.

Amendments under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

### **Publishing & Notices**

A notice of availability of the proposed document for public review and comment will be published in the local newspaper(s) prior to the submittal to HUD. This notice will provide the following:

- A short summary of the document
- Details of the comment period (30 days for plans and substantial amendments, 15 days for performance reports)
- List of locations of where copies of the entire plan or report may be examined and
- List of public hearing dates and locations

The City will provide electronic and written marketing communications at least two weeks in advance of a Public Hearing.

Publishing & Notices under Public Health Recommendations or Major Disaster Declaration:

See Abbreviated Plan below.

### **Public Hearings**

A minimum of two public hearings will be held throughout the program year. The hearings will be conducted at a minimum of two different stages of the year. Together, they will address housing and community development needs, development of proposed activities, review of program performance, and announce if the City plans to access pre-award costs as allowed by the Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200. At least one of the hearings will be held before the proposed document is published for comment.

CEDD will try to hold public hearings at times and locations convenient to residents who may benefit from the CPD programs. Locations will be accessible for residents with disabilities. In addition, CEDD intends to comply with the intent and spirit of the Americans with Disabilities Act. If a sign language interpreter, personal P.A. system or other special accommodations are needed, CEDD, will be prepared to assist if notified 48 hours in advance. Additionally, CEDD will provide interpreters when it is evident that a significant number of non-English speaking persons will be present.

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Although not required, a third public hearing may be conducted to receive feedback regarding performance reports and/or special projects.

Public Hearings under Public Health Recommendations or Major Disaster Declaration:  
See Abbreviated Plan below.

**Abbreviated Plan due to Public Health Recommendations or  
Major Disaster Declaration**

An abbreviated plan may be utilized under the following circumstances:

1. National or local health authorities (or other local, state or federal agencies) recommend social distancing and limiting public gatherings for public health reasons OR
2. The above-mentioned authorities or agencies make a major disaster declaration for an area which includes the City of Rockford.

The City may implement all or any portion of this abbreviated plan, which includes the following:

1. Marketing communications: The City will provide marketing communications, as available, at least 3 days in advance of a Public Hearing.
2. Public Comment Period: The public comment period will be a minimum of 5 days, if so approved by HUD.
3. Virtual Public Hearings: The City reserves the right to conduct virtual recorded public hearings, as appropriate, to ensure the health and safety of community residents. This includes, but is not limited to, adherence to any mitigation measures as required by public health officials and local, state or federal agencies. All efforts will be made to provide timely response to citizen questions and provide public access to questions and responses.

**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 and Economic 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 person 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.

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If the person 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.

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