

**CLERMONT COUNTY, OHIO  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM  
CITIZEN PARTICIPATION PLAN**

Addendum – Citizen Participation Plan for the Covid 19 Disaster Declaration Coronavirus Health Crisis of 2020 Pandemic Response (changes in bold and in red here) – Updated June 3, 2020 Per federal regulations at 24 CFR 91.105, Clermont County must adopt a Citizen Participation Plan (CPP) that sets forth its policies and procedures for citizen participation and gives its citizens “Reasonable Notice and Opportunity to Comment” on the management and use of federal grant funds received from the U.S. Housing and Urban Development (HUD). When a change in federal regulations or programs require changes in the CPP and community input, the CPP may need to be amended, go through a community input process on the amendment, and adopted by the County’s authorizing body. As a result of the unprecedented Coronavirus health crisis of 2020 and its impact on the U.S. economy, Congress approved the Coronavirus Aid, Relief and Economic Security Act (CARES Act) (Public Law 116-136) and made available supplemental Community Development Block Grant (CDBG), Emergency Solution Grant (ESG) and Housing Opportunities for Persons With Aids (HOPWA) funding for grants to prevent, prepare for, and respond to Coronavirus (CV grants). The CARES Act also provides the County with the flexibility to make it easier to use CARES Act grant funds and fiscal years 2019 and 2020 grants for expeditious Coronavirus response by authorizing HUD to grant waivers and alternative requirements for specified periods as noted below. Due to the need for expediting distribution of new funding under the CARES Act, and national/local recommended social distancing guidelines and stay at home orders, HUD has authorized grantees such as Clermont County to amend its CPP to establish expedited procedures and waive in-person public meetings. The CPP is hereby amended to include the following changes:

- In response to the Covid-19 Disaster Declaration, in a Memorandum issued March 31, 2020, HUD has waived the 30-day minimum for the required public comment period. It now allows for a 5-day comment period on substantial amendments to the Consolidated Plan/Action Plans through the end of the County’s 2020 program year. The County will shorten its public comment period from 30 to 5 days. If the County wishes to make further amendments to prior plans following the 2020 program year, the County can do so during the development of FY 2021 Annual Action Plan.
- Includes virtual hearings as an allowed citizen participation method for public meetings and focus groups. If virtual hearings are used, real-time responses must be facilitated and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible with reasonable notice.
- Updates the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent Coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments.

- Includes by reference provisions relative to Consolidated Plan citizen participation, Community Development Block Grant (CDBG) waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.
- Provides details on possible actions, including reprogramming of funding, addition of funding to related activities, changes in scope of activities, and types of possible activities that may be undertaken in response to the declared disasters or emergency events such as COVID-19 pandemic.
- Makes minor edits that do not change the current intent and policies of the CPP.

## I. PURPOSE

Clermont County is establishing a Citizen Participation Plan in accordance with the intent of the rules, regulations and guidelines of the various federal and state agencies having oversight for the programs carried out under the Housing and Community Development Act of 1974, as amended.

As part of the Consolidated Planning process, units of local government receiving CDBG, Emergency Solutions Grants (ESG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons with AIDS (HOPWA) from the Department of Housing and Urban Development (HUD) must follow the requirements of 24 CFR 570.486 which provides for, and encourages, citizen participation and which emphasizes participation by persons of low- or moderate-income, particularly residents of predominantly low- and moderate-income neighborhoods, slum or blighted areas, and areas in which the local government proposes to use CDBG, Emergency Solutions Grants (ESG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons with AIDS (HOPWA) funds. The plan must:

- Provide citizens with reasonable and timely access to local meetings, information, and records related to the grantee's proposed and actual use of funds
- Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance
- Provide for timely written answers to written complaints and grievances
- Identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate

This written Citizen Participation Plan provides for the full implementation of Clermont County's policy on Citizen Participation, the purpose of which is full and meaningful participation of any individual regardless of race, color, religion, gender, age, sexual orientation, national origin and physical or mental handicap in the planning and implementation of the County's Community Development Block Grant Programs as well as well as any other grants identified above.

The Citizens Participation Plan assures that the CDBG program meets the needs of those whom it is primarily intended to benefit, namely low-and moderate-income persons. Failure to seek and consider citizen input is a violation of program regulations and can result in citizen complaints and charges that national program objectives are not being met.

## **II. PROGRAM POLICY**

It shall be the general policy under this plan to:

- (A) Provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which section 106 funds are proposed to be used, and in the case of a grantee described in section 106(a), provide for participation of residents in low and moderate income neighborhoods as defined by the local jurisdiction;
- (B) Provide citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual funds under this title;
- (C) Provide for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- (D) Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- (E) Provide for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
- (F) Identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the responsibility or authority of the grantee for the development and execution of its community development program.
- (G) Encourage citizen participation in the development of the consolidated plan, substantial amendments to the consolidated plan, and annual reports

- (H) Encourage consultation with public housing agencies and residents of public housing developments and other low-income housing areas in the development and implementation of the consolidated plan.

**III. DEVELOPMENT OF THE CONSOLIDATED PLAN, AMENDMENTS TO THE CONSOLIDATED PLAN, ANNUAL ACTION PLAN AND PERFORMANCE REPORTS.**

In order to implement this plan, the following citizen participation efforts will be completed for Consolidated Plan, Annual Plan, Amendments to the Consolidated Plan, and Performance Reports.

- (A) Development of the Consolidated Plan: There will be two public hearing for citizens, and a minimum of two additional focus group meetings with housing, social service, and health agencies, and local municipal governments concerning the Consolidated Plan and other basic Program requirements. Information concerning funding projections over the life of the Con Plan, the County's plan to minimize displacement and assist any displaced person, and general activity information, will be provided. The major goal will, however, be to obtain views concerning community needs and incorporate them in the Con Plan.
  - There will be a minimum of two focus group meetings: one for housing and public service agencies, and one for local agencies and officials, both of which will include any relevant community and faith-based organizations. These meetings will occur in January and February, before the preliminary Con Plan is drafted, so that the views aired may be considered for incorporation.
  - Two public hearings will occur. The first will occur during plan development before the Con Plan is submitted for review and approval by the County's Board of Commissioners. The second public hearing will occur simultaneously with presentation of the County's Annual Action Plan.
- (B) Development of Annual Plans: Each year, the County must prepare an Annual Plan (outlining strategies, actions, and activities to be undertaken during the coming year) for its CDBG and any special program allocations coming from HUD. The Annual Plan must be developed in consultation with citizens and stakeholders, and at least one public hearing will occur. There are 27 local communities in Clermont County. CDBG funds are allocated to each community which develops its own program in conformance with law and regulation, and in conformance with the Con Plan.

The 27 local communities in Clermont County will meet this requirement in the following manner:

- A general community meeting will be held early in the planning cycle, usually late September or early October. Communities receive essential program information, and are encouraged to ask questions and discuss concerns at this time. In years when a Consolidated Plan is being developed this meeting will be held during the plan development.
- Each community will conduct its own public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation. These hearings will occur within three months of the community meeting.
- A second public hearing will occur, at the County level, once the Annual Plan has been prepared, but prior to its submission for review and Board of Commissioner adoption. This hearing will be coincident with that for the Consolidated Plan, when appropriate.

(C) Amendments: The County may find it necessary to amend its Consolidated Plan or Annual Plan, due to exigency or to further Consolidated Plan or Annual Plan goals and activities. Sometimes one or several such changes may substantially (defined below) alter the Plan(s) to such an extent that public input is required. The County has therefore established the following criteria to establish a threshold to require further public participation.

Definition of Substantial Amendment:

- i. Consolidated Plan: Any significant change in priorities, goals and objectives (e.g. new addition or deletion of existing) outlined in the Consolidated Plan.
- ii. Annual Action Plan: One, or several cumulative activity changes, equal to 10% of any years grant funding, or any change that would significantly affect the outcomes of the Consolidated Plan or Annual Plan as approved by HUD. Change, as defined, affects the size, scope, location, or beneficiaries of activities.

Citizen Notification: Citizens will have reasonable notice and opportunity to comment on substantial amendments through:

- i. A public notice explaining the nature of, and reasons for, the amendment.
- ii. A public hearing.

Citizens will be directed to the website of the County for detailed information. The notice will be published in a newspaper of general circulation, and will advise the public of the date, time and venue for the hearing. At least thirty days must lapse between publication and the hearing itself.

- (D) Performance reports: The County will provide citizens with reasonable notice and an opportunity to comment on program performance before submission of the performance report.
- Reasonable notice will be provided through notice in a newspaper of general circulation, indicating where the report may be reviewed, and notifying the public that a public hearing will be held for the purpose of evaluating program performance. The Notice will indicate that the program report may be reviewed on the website of the County. This Notice will be published at least 30 days before submission of the performance report to HUD, and 10 days before the Public Hearing.
  - The County will consider written, electronic, and oral comments received before submission of the performance report. A comment summary will be attached to the report, along with a narrative explanation of how they were considered.
- (E) Consideration of Comments Received: The County will consider any comments or views received (oral, written or electronic), as they pertain to the Consolidated Plan, Annual Plan, or substantial amendments, and the performance report. A summary of comments and how they were considered will be attached to the Consolidated Plan and Annual Plan, in conformance with HUD regulations.

#### **IV. PUBLIC HEARINGS AND MEETINGS**

In order to implement this plan a minimum of two public hearings will be conducted per year. The minimum citizen participation public hearing and meeting requirements for the CDBG program will be the following:

- (A) Adequate notice of Public Hearing #1 must be published 10 days in advance in a newspaper of general circulation in the locality. This ad must state the amount of funds available to the locality and the range of eligible activities. This ad will also state funds available for projects.
- (C) Notification of public hearing will be sent to local units of government at the same time the public hearing is published. Grant applications will be provided at the time of notification.

- (C) Public Hearing #1 will be held prior to the development of the Annual Plan. It will be at this time that county applications will be made available as well as survey forms and income guidelines. Information to be conveyed and program areas to be discussed are the following: National and state program objectives; amount of funds available to the locality; range of eligible activities; a summary of other program requirements; performance of the locality in past CDBG programs, if applicable; a summary of other programs and their requirements; date of public hearing #2; citizen views and comments.
- (D) Minutes of Public Hearing #1 will be maintained in the County's Citizen Participation File. The minutes will be accompanied by a list of attendees at each hearing.
- (E) The County will accept applications through by the deadlines set by the County.
- (F) The County will review the applications received and after analysis of all applications, the Board of County Commissioners will select pending years' activities.
- (G) Adequate notice of Public Hearing #2 must be published 10 days in advance in a newspaper of general circulation in the locality where the projects exist (Clermont Sun, Community Journal, Cincinnati Post, Cincinnati Enquirer). This ad must state the amount of funds available to the locality, the projects at have been chosen to receive funding, and the funding for each project.
- (H) The County will send written notices to notify each township, village and other applicants of what projects have been selected. The notice will also announce the place, date and time of public hearing #2.
- (I) Public Hearing #2 will be held after the projects are chosen, but prior to the application's submission to the Department of Housing and Urban Development (HUD). The following information and areas will be discussed: a presentation by a representative of the County on the County's proposed CDBG program; including the activity or activities to be undertaken; the amount of CDBG and other funds allocated for each activity; the objective of each activity; the timetable for starting through completion of each activity; what national objectives each activity will meet; as well as citizens' views and comments.
- (J) Minutes of Public Hearing #2 will be maintained in the County's Citizen Participation File. The minutes will be accompanied by a list of attendees at each hearing.

- (K) Any written citizen comments or complaints provided at the public hearing or during the implementation of the program will be maintained in the County's Citizen Participation File.
- (L) Citizens will be provided reasonable and timely access to all local meetings held as part of the implementation of Clermont County's CDBG Activities.

## **V. OTHER REQUIREMENTS**

Citizens' complaints regarding the planned or actual implementation of the program will be responded to promptly in writing within 15 days. At the time the response will be sent to HUD. The response to a citizens' complaint shall include any remedial action that the County proposes to undertake.

Program documents will be made available for public inspection and copying during regular business hours at the Clermont County Department of Community and Economic Development, upon written or oral request.

All files, information, and records concerning individual applicants or household members shall remain confidential and will not be made available for public inspection.

A Citizen Participation Plan is a required element of the Community Development Block Grant (CDBG) Program. Clermont County, Ohio proposes the following activities be included in the Citizen Participation Plan pursuant to the guidelines set forth in the *Citizen Participation Plan* (24 CFR Part 91.105).

## **VI. IMPLEMENTATION EFFORTS**

Implementation of the Citizen Participation Plan for Clermont County, Ohio, will be the responsibility of the grantee/administrator (herein grantee), through the Clermont County Department of Community and Economic Development. All information herein can be obtained by visiting the Clermont County Department of Community and Economic Development (CED), 101 E. Main St., 3<sup>rd</sup> Floor, Batavia, Ohio, 45103 (513) 732-7125 or by referencing the CED web <http://www.clermontcountyohio.biz/programs.aspx>

The Citizen Participation Plan is planned for implementation in the following manner. Advertisement of the CDBG Community Development Program and activities through:

- The local newspapers
- Brochures available at: libraries/government buildings/community facilities
- Clermont County web site
- Announcements at public meetings

Records available during working hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except holidays, including copies of:

- Citizen Participation Plan
- Citizen Complaint Procedure Form
- Public Hearings or Comment Notices
- Notices to Local Jurisdictions
- Meeting Minutes
- Meeting Attendees
- Citizen Complaint Responses
- Program Regulations
- Applications
- Status Reports and Performance Reports
- Activity Guidelines
- Other Correspondence

**The Citizen Complaint Procedure includes:**

- A formal, written complaint form to be filled out in entirety by the grantee's client **(see attached Citizen Complaint Form)**.
- A review of the complaint forms by the grantee.
- Initial correspondence with grantee's client, either by telephone, e-mail or letter, will not exceed 15 days past the generation date of the complaint form.
- Initial correspondence will be made by the grantee, through the Department of Community and Economic Development, unless otherwise indicated on the complaint form.
- The grantee may request the CEO to review the case and recommend a resolution.
- The grantee will establish a review committee for citizen's complaints. Meetings will be scheduled if the complaint is not rectified during the initial correspondence. Those in attendance will include the grantee's client, a representative of the grantee, a local governing official, and any other parties affiliated with the complaint matter if necessary. The review committee will serve a term of one year. The grantee may not serve on the committee; however, they may attend the complaint meeting.
- The grantee's client may submit a written description of their complaint to the committee and/or make a presentation.
- The review committee must notify the grantee's client and the grantee of its decision within 10 days after the date of the meeting.

The CDBG Citizen Complaint Procedure detailed above is based on the Community Housing Improvement Program Client Complaint Procedure: *Ohio Small Cities CDBG Program Policy Book*.

We, the undersigned promise to adhere to the Citizen Participation Plan detailed herein for CDBG and other aforementioned grant programs.

\_\_\_\_\_  
President  
Clermont County Commissioners

\_\_\_\_\_  
Date

ATTEST:

APPROVED AS TO FORM:

\_\_\_\_\_  
Judith Kocica, Clerk  
Board of County Commissioners  
Clermont County, Ohio

\_\_\_\_\_  
Assistant Prosecuting Attorney  
Clermont County, Ohio

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

Citizens Complaint/Comment Form

\_\_\_\_\_ Program Grant Number \_\_\_\_\_

Date \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_

Telephone No. \_\_\_\_\_

Type of Inquiry:     Walk - in                       Telephone                       Comment

Description of Complaint/Comment

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Intake Person's Signature \_\_\_\_\_ Date \_\_\_\_\_

Constituent's Signature \_\_\_\_\_ Date \_\_\_\_\_

Complaint will be responded to within 15 working days from the date of Constituent's signature.

\_\_\_\_\_

Office Use Only:

Type of Complaint/Comment     Fair Housing                       Contractor                       Program

Action Taken:

- No response necessary                       Complaint/comment read to caller
- Citizen Complaint/Comment Form mailed to Constituent for signature on \_\_\_\_\_

Staff members initials \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_