



CITIZEN PARTICIPATION PLAN



HAMILTON COUNTY
Planning +
Development

Hamilton County Planning and Development Department
Community Development Division
Citizen Participation Plan

(Updated September 2022)

This Citizen Participation Plan (CPP) provides for and encourages the participation of all jurisdictions/citizens in the development of Community Development programs funded with U.S. Department of Housing and Urban Development (HUD) entitlement funds. Several opportunities are provided for citizen participation before, during and after each program year, which is March 1 - February 28 or February 29 (Note: the County's program year for HUD funded programs will change to July 1 to June 30 in FY 2023).

The CPP will involve a broad range of citizens with an emphasis on very low-, low-, and moderate-income residents, where housing and community development funds may be spent.

Citizens, public agencies, and other interested parties, including those most affected, will have the opportunity to receive information, review and submit comments on any proposed action.

All the meetings, including the Public Hearings will be:

- Conveniently timed for people who might or will benefit from program funds
- Accessible to people with disability
- Adequately publicized
- Receptive to views of citizens, public agencies, and other interested parties
- Held in a central location to outreach low-income areas in each community

The Planning and Development Department will provide technical assistance to low-moderate income citizens, jurisdictions or groups who request such assistance in preparing and submitting Community Development Project requests.

Below is an outline of the Citizen Participation Process at the Community and Countywide Levels. A chart outlining the process follows.

Stage One

Community Level Assessment

1. First Public Hearing at the Local Government Level - Each participating local community in Hamilton County schedules a public hearing to obtain citizen views on housing and community development needs. Prior notice of this hearing is provided by the community, and low-moderate income residents or those who reside in blighted areas are encouraged to attend the meeting and make their needs known.
2. Local Public Officials develop proposed Community Development projects - After the hearing is held, the local governing body makes a final determination of local priorities and projects for which Community Development funding will be requested.

3. Second Public Hearing at the Local Government Level - A second public hearing is scheduled to present to the citizens the proposed projects for consideration and input.
4. Local Public Officials approve and submit a list of projects to Hamilton County for funding consideration.

County Level Assessment

1. Staff outreaches and consults with public housing agencies and public/private community service organizations to determine county-wide needs, coordinate actions and recommend projects for county-wide funding consideration.
2. Staff holds a meeting of the Community Development Advisory Committee to consider county-wide needs and projects.

Stage Two

Preparation of the Annual Action Plan

After receiving applications from the communities and agencies, the staff will prepare a proposed Annual Action Plan and Three-Year Plan, taking into consideration comments received at the previous meetings. This is essentially a list of proposed projects for HUD funding.

County-Wide Public Hearings

Following completion of the first draft of the Annual Action Plan and Three-Year Plan, a notice is published in a newspaper of general circulation informing the public of two opportunities to comment on the draft plans. The first opportunity is a public hearing held concurrently with a second Community Development Advisory Committee Meeting or Board of County Commission meeting, and the second is a public hearing scheduled before the Board of County Commissioners.

Stage Three

Approval Process

Following the public hearing before the Board of County Commissioners, the Commissioners will review the proposed Three-Year Plan and Annual Action Plan and any citizen comments and then direct the staff in their preparation of the final plan. The final plan is then approved by the Board of County Commissioners and submitted to HUD for review. The Final Action Plan can be examined at the Community Development Division Office during business hours.

CPP Process General Guidelines

This full three stage process will be repeated every three years in conjunction with the CDBG urban county qualification process to develop the Community Development Three-Year Plan. During the second and third years of that cycle, local governments need only reaffirm projects that were part of the plan. Should a local community wish to change projects scheduled for year two or three of the plan, the stage one, Community Level Assessment process must be followed. Stage two (except for the 2nd Community Development Advisory Committee Meeting) and Stage three of this Citizen Participation Plan will be followed in developing the annual action plan for years two and three of the three-year cycle.

Plan Amendments

The Community Development program also provides opportunity for citizen comment whenever a “substantial change” in the use of funds is proposed during the program year. A substantial change includes:

- A) Any proposal to delete a previously approved project or to add a new project.
- B) Any change in a budget by 10% or more of the total grant.
- C) Any significant change in the character, scope, scale, or location of a project that requires an amended environmental review.

When a community proposes a “substantial change”, the local governing body must publish a notice describing the proposed change and set a public hearing before the local governing body to receive citizen comments. After citizen comments (if any) have been received and considered, the governing body submits the proposal to the Community Development Division. Formal action by the Board of County Commissioners is taken to amend the Action Plan. A copy of the amended Action Plan is sent to HUD.

A similar process is followed for substantial changes proposed by the County for any “county wide” projects. In these cases, notice is published by the Community Development Division for a hearing to receive citizen comments on the proposal. The Board of County Commissioners then formally takes action to amend the Action Plan and send it to HUD. The amended final Action Plan is available for review on the Community Development website.

Consolidated Annual Performance and Evaluation Report

At the completion of each program year, the Community Development Division prepares for submission to HUD a Consolidated Annual Performance and Evaluation Report (CAPER). This summarizes the status of all active projects in the Hamilton County program. Preparation of the CAPER is completed within 60 days of the end of the program year.

The CAPER is then made available for review and comment by interested parties. Notice of its availability is published in a newspaper of general circulation. All written comments concerning the CAPER that are reviewed by the Community Development office within the following 15 days are included with the CAPER submission to HUD. The CAPER and comments must be submitted to HUD within 90 days of the end of the program year.

Public Notices

Hamilton County will provide the community advance notice of public hearings and or public comment periods. The notice will be published in a single newspaper of general circulation, which may include but will not be limited to, the Cincinnati Herald and or the Cincinnati Enquirer, not less than fourteen (14) days prior to the date of the hearing and the start date of the comment periods. The notice will include include the time, day and date of the hearing, its location, a general statement regarding its purpose and any other more specific information about the public hearing and or comment period

required by the Consolidated Plan, Annual Action Plan, Substantial Amendment, or the Consolidated Annual Performance Report. Public notices will also be posted to the County's website.

Comment Periods

The Proposed Consolidated Plan, Proposed Annual Action Plan and any Proposed Substantial Amendment will be made available for citizen review and comment for a minimum of 30-days prior to adoption by the Board of County Commissioners. The County will make the documents or related summaries available through to the public by posting in a newspaper of general circulation and posting to the County's website for a minimum of 30-days prior to the County Commissioners meeting date.

Citizens will be provided with a 15-day comment period on the Consolidated Annual Performance and Evaluation Report (CAPER). Comments received on the CAPER shall be attached and submitted to HUD.

Document Access

Interested citizens may request information about the Consolidated Plan or the status of any plan activities during the program year. Copies of all planning documents, including the Citizen Participation Plan, Consolidated Plan, annual Action Plan, Substantial Amendments, and the Consolidated Annual Performance and Evaluation Report (CAPER), are available at the County's Community Development Division and will be available to the public upon request. Community members will have the opportunity to review and comment on applicable federal reports in draft form prior to final adoption by the Board of County Commissioners. To make a comment or provide feedback, members of the public can contact Hamilton County's Community Development Administrator, 138 E. Court Street, Rm 1002, Cincinnati, OH 45202.

Technical Assistance

Upon request, the County will provide reasonable accommodations to assisting organizations representing persons of low and moderate income that request such assistance in developing proposals for funding assistance under the Consolidated Plan. The provision of technical assistance does not guarantee an award of funds.

Complaints and Grievances

Written complaints related to Hamilton County's programs and activities funded with HUD entitlement grant funding may be directed to the County's Community Development Division. The County will provide a written response to all written complaints or grievances within 15 working days of receipt of the complaint by the County. If a response cannot be prepared within the 15-day period, the complainant will be notified of the approximate date a response will be provided. Written complaints must include complainant's name, address, zip code, and phone number and should be addressed to Hamilton County's Community Development Administrator, 138 E. Court Street, Rm 1002, Cincinnati, OH 45202.

CARES Act Waivers (Citizen Participation Plan Amendment – April 2020)

On April 9, 2020, the U.S. Department of Housing and Urban Development issued waivers and alternative requirements, as provided for in The Coronavirus Aid, Relief and Economic Security Act

(CARES Act), that provided grantees with flexibilities to prevent, prepare for, and respond to the coronavirus for HUD FY 2019 and FY 2020. As part of these waivers, grantees may amend Citizen Participation Plans and public hearing requirements for Consolidated Plans (including Action Plans) and Substantial Amendments.

Hamilton County is utilizing the following waivers and alternative requirements in this amendment to the Citizen Participation Plan:

- Allows grantees to amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans including Action Plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans.
- In person public hearings are not required. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) 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.

Under the CARES Act waivers, Hamilton County will reduce the public comment period from 30 to 5 days for Substantial Amendments for HOME, CDBG and ESG until the time limit on the waivers expires.

The public notice and substantial amendment to FY19 will be posted on the County's website. An email address will be provided and monitored to answer any questions and take any comments regarding the amendment. We will also send emails to key stakeholders notifying them of the amendment and the shortened comment period.