



## **COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME INVESTMENT PARTNERSHIPS PROGRAM**

### **CITIZEN PARTICIPATION PLAN**

#### **1. Overview**

Clark County annually receives Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Community Development (HUD) which it administers through the county's Department of Community Services. The primary purpose of CDBG is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. HOME funds provide a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to people who are low-income.

As a recipient of these funds, the County is required to produce the following documents:

- Consolidated Plan – a five-year plan that documents the housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments and an Annual Action Plan that describes specific CDBG and HOME-funded projects that will be undertaken over the course of the upcoming program year; and
- Consolidated Annual Performance and Evaluation Report (CAPER) – evaluates the use of CDBG and HOME funds from the previous program year.

This Citizen Participation Plan has been developed to provide citizens and other interested parties opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG and HOME programs and to review and comment on the documents listed above.

#### **2. Citizen Participation**

The Citizen Participation Plan outlines the County's responsibility for providing opportunities for active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all residents, emphasizing involvement of low- and moderate-income residents, people with disabilities, minorities and residents of assisted housing;
- Inform citizens of the Consolidated Plan and the Annual Action Plan, including funds available from CDBG, HOME and other Homeless Programs and eligible activities under these programs;
- Give all citizens an opportunity to identify and respond to priority needs;

- Give all citizens an opportunity to identify and respond to proposed projects and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

The County shall follow a citizen participation plan that addresses the following issues: participation, access to meetings, access to information, access to records, publishing the plan, public hearings, notice of hearings, public comments, technical assistance, complaints, and amendments.

**a) Encouragement of Citizen Participation in CDBG/HOME Planning and Activities:** All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the:

- Consolidated Plan: Five-Year Plan and Annual One-Year Action Plan;
- Substantial Amendments to the One-Year Action Plan or Five-Year Plan;
- Citizen Participation Plan; and
- Consolidated Annual Performance and Evaluation Report (CAPER)

All meetings are open to the public and are scheduled at times and locations convenient to potential and actual beneficiaries with accommodations for persons with disabilities and oral language assistance (interpretation) for non-English speaking persons. Those wishing to be regularly informed of meetings/activities can be added to the program mailing and e-mail lists. All of the documents referenced above will be available for review and public input through the following means:

- Posted to the Clark County CDBG/HOME web page: [www.clark.wa.gov/cdbg](http://www.clark.wa.gov/cdbg);
- Social media messages including Clark County's Facebook page and Twitter account: @ClarkCoWA;
- Provided to interested parties through email distribution lists;
- Available for review at the Clark County CDBG/HOME Program offices at 1601 E. Fourth Plain Boulevard, Building 17, Vancouver, WA 98660;
- Mailed to interested parties upon request; and
- Provided at public hearings.

**b) Public Hearings, Document Availability and Comment Periods:** Public hearings will be held for the approval of, or amendments to, the Consolidated Plan and CAPER. The public hearing notice shall include a summary of the contents and purpose of the documents, and shall include a list of the locations where copies of the proposed document may be examined. During the public comment period, copies of the proposed documents will be made available as described above and reasonable accommodations will be made for non-English speaking persons and for people with disabilities.

The public may comment on any proposed documents in writing or at the public hearing. Written comments must be directed to the CDBG/HOME Program Manager, Clark County CDBG Program, Department of Community Services, PO Box 5000, Vancouver, WA 98666-5000 or [pete.munroe@clark.wa.gov](mailto:pete.munroe@clark.wa.gov). Clark County shall consider any comments received in preparing these documents.

Public Hearing Location: The public hearing shall be held in the Clark County Councilors Hearing Room, Sixth Floor, Public Service Center, 1300 Franklin, Vancouver, WA.

**c) Final Policy/Implementational Authority:** The program recognizes that as the elected governing body of Clark County, the Board of County Councilors has the ultimate responsibility and authority for the implementation of the Consolidated Plan and CDBG and HOME activities and documents.

**3. Public Hearing Notice and Corresponding Public Comment Period Requirements**

Notices of public meetings, public hearings, substantial amendments, notifications of comment periods, and the notification of Clark County’s proposed and actual use of CDBG/HOME funds will be put on the Clark County CDBG/HOME web page: [www.clark.wa.gov/cdbg](http://www.clark.wa.gov/cdbg).

Citizens, organizations, agencies and other interested parties will be encouraged to submit their comments on the proposed Consolidated Plan, Annual Action Plan and CAPER. All comment periods will begin the day notice is posted. Minimum comment periods are listed below:

Document	Comment Period
Citizen Participation Plan	15 calendar days
Consolidated Plan input (Five Year and One Year Plans)	30 calendar days
CAPER	15 calendar days
Substantial Amendment	30 calendar days

Clark County will consider all comments in preparing its Consolidated Plan, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

To further encourage the attendance and participation of persons of low- and moderate-income, notices will also be sent to:

- Vancouver Housing Authority;
- Clark County Community Action Program;
- Continuum of Care;
- agencies that provide housing, health, and social services including those that provide services to children, elderly, disabled, people living with HIV/AIDS, and those who are homeless;
- agencies that represent minorities residing in Clark County;
- other interested parties on the Clark County HOME/CDBG mailing list.

**4. Access to Records**

Clark County shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the County’s use of assistance under the CDBG and HOME Programs during the preceding five years.

Copies of the adopted consolidated plan, adopted substantial amendments, and adopted performance reports, as well as information regarding use of funds and other program information will be maintained by the County's CDBG and HOME program staff.

The public may access these materials by contacting the Program Manager, Clark County CDBG Program, Department of Community Services, PO Box 5000, Vancouver, WA 98666, voice (360) 397-2130, Relay 711, 8:00 a.m. to 5:00 p.m., Monday through Friday. Reasonable accommodation for persons with disabilities will be made upon request. The CDBG and HOME Program web page address is: [www.clark.wa.gov/cdbg/](http://www.clark.wa.gov/cdbg/)

**5. Program Year and Funding Availability**

The Clark County Program Year runs from July 1 to June 30 each year. Early in October, Clark County publishes a Notice of Availability of CDBG and HOME funds. Through this notice, Clark County will make available to citizens, public agencies, and other interested parties information that includes the amount of funding Clark County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The Notice will also inform the public of the time and place of the CDBG and HOME workshops described more fully in Section 6 of this Plan.

**6. Program Year Schedule**

July 1	Start of program year
September	Public Hearing to hear input on Consolidated Plan (Action Plan) prior to publication Public Hearing regarding performance of previous year’s activities: CAPER (15-day comment period prior to submission) CAPER submitted to HUD
October	Notice of Availability of CDBG/HOME Funds Annual applications available for CDBG and HOME funds Pre-submittal meeting/technical assistance for CDBG and HOME
December	CDBG and HOME applications due
March	CDBG and HOME projects selected by UCPB for funding
April	Public Hearing on Action Plan/Consolidated Plan (30-day comment period following hearing)
May	Action Plan submitted to HUD
June 30	End of program year

**7. Competitive Fund Allocation Process**

Clark County receives annual allocations of CDBG and HOME funds. After funding awards are made, any funds returned from projects, either completed under budget or cancelled, are used for projects not awarded their full request due to lack of funds. If additional funds remain, they are reallocated in the next program year funding cycle.

The County utilizes separate competitive fund allocation processes to recommend HOME and CDBG projects for funding to the Board of County Councilors. The public is notified about the availability of the funding applications in the same way documents for review are advertised. Notice of funding availability is also emailed to cities, nonprofits, and past recipients. The process also includes an application workshop and technical assistance.

- a) CDBG and HOME Funding Workshops: When the Notice of Availability of CDBG and HOME funds is released, workshops for CDBG and HOME applications are also advertised. Workshops are conducted to assist applicants who may apply to Clark County for CDBG or HOME funds. At the workshops, program objectives, eligible activities, eligible applicants, funding policies, application forms and the proposal evaluation and selection process are discussed. Department

staff will also meet with applicants individually (upon request), to discuss proposal development and to provide assistance. Each workshop participant receives a copy of the annual Request for Proposals, Proposal Forms and Instructions, and the County's CDBG and HOME Funding Policies. The locations of the workshops are accessible.

- b) City Community Development Meetings: Each city, before it may submit its CDBG and/or HOME application, must hold a public meeting to inform the residents about program objectives, eligible activities, and to solicit public comment on local needs. Proposed projects must be consistent with the Consolidated Plan and local plans and community strategies. Nonprofit agencies proposing projects in specific cities must provide information about their project to the city at a regularly scheduled city meeting before their application is submitted to the county. Each city or town must document their citizen involvement processes and provide the documentation with their funding application.
- c) Project Selection: The Urban County Policy Board (UCPB) selects CDBG and HOME projects based on a numerical scoring system. The UCPB consists of the mayors of all cities and towns in the county, except the City of Vancouver, or their designee and is chaired by a county councilor. The projects selected are recommended to the Board of County Councilors for final approval and submission to HUD. UCPB meetings are regularly scheduled for the second Monday of the month in the Public Service Center located at 1300 Franklin, 6<sup>th</sup> Floor, Room #679, Vancouver, WA. The meeting is scheduled from 8:30 to 10:00 a.m.

## 8. Program Performance Review

A public hearing is held in late September by the Board of County Councilors to collect public input on the County's performance during the last program year. The Consolidated Annual Performance Evaluation Report (CAPER) analyzes progress towards the goals established in previous plans with regard to the unit of measure for the project, as well as timely completion. This report also provides information on the performance of funded projects in relationship to the program objectives. The public hearing and comment notice will be at least 15 days before the date of the hearing. The CAPER will be made available for public review and Clark County shall consider any comments or views received. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final CAPER.

## 9. Non-English Speaking and Handicapped Residents

### Public Hearing/Meeting Accommodation

All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the County will provide translators at public hearings and meetings. Telephonic oral language service (interpretation) is also available. Meeting notices will be sent to organizations representing non-English speaking residents of Clark County.

### CDBG/HOME Document and Materials Review Accommodations

Reasonable accommodations will be provided to disabled persons, or non-English speaking persons needing assistance in reviewing CDBG/HOME program materials or documents.



For other formats, contact the Clark County ADA Office: **Voice** (360) 397-2000; **Relay 711** or (800) 833-6388; **Fax** (360) 397-6165; **E-mail** [ADA@clark.wa.gov](mailto:ADA@clark.wa.gov).

## 10. Technical Assistance

Clark County will provide technical assistance to groups that request such assistance to develop an application to the County or HUD. Such technical assistance may include an explanation of:

- a) Program rules and regulations;
- b) Requirements for implementing and managing projects;
- c) Project eligibility and national objectives requirements; and
- d) The evaluation process used by the Urban County Policy Board in recommending projects to the County Board of Councilors.

The County's provision of technical assistance does not include the preparation of grant applications for individuals or organizations and is limited by funds and staff availability.

**11. Procedures for Complaints or Grievances**

Complaints, inquiries, and grievances shall be submitted in writing to the Program Manager, Clark County CDBG/HOME Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98668-5000. A written response shall be provided to the complaining or aggrieved party within 15 working days of the date of receipt of the written complaint or grievance.

**12. Criteria and Procedures for Amendments and Substantial Amendments to Action Plans and/or the Five Year Consolidated Plan**

A "substantial amendment" is an amendment to the Consolidated Plan/Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, Clark County will provide citizens with a 30-day notice of an opportunity to comment whenever a substantial amendment is being proposed. Clark County shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted shall be included in this summary along with the reason they were not accepted.

**A substantial amendment is defined, in accordance with 24 CFR 91.505(a), as:**

- a) A change in allocation priorities (any change greater than 30 percent in an individual project budget) or a change in the method of distribution of funds;
- b) Carrying out an activity (including those funded exclusively with program income) not previously described in the Consolidated Plan or Annual Action Plan; or
- c) A change in the purpose, scope, location or beneficiaries of an activity.

**Changes that are not considered substantial amendments:**

- a) Changes to the CDBG or HOME budget for a project by an amount that is less than 30 percent;
- b) Consolidated Plan data updates such as census data, income limits, fair market rents, HOME high and low rent limits, HOME subsidy limits, and similar types of data;
- c) A minor change in location as long as the purpose, scope, and intended beneficiaries remain essentially the same; or
- d) The transfer of funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering).

**13. Minimizing Displacement**

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act, the Clark County CDBG and HOME Programs will take the following steps to minimize displacement of people, businesses, nonprofits, and/or farms:

- a) Discourage projects involving displacement/relocation through a grant application scoring system that reduces the total score of projects that anticipate displacement/relocation;
- b) Encourage project sponsors to plan or stage projects to minimize and/or prevent the adverse impacts of displacement;
- c) Provide for the establishment of temporary relocation facilities in order to provide housing to households whose displacement will be temporary;
- d) Provide advisory services which will include such measures, facilities, and services as may be necessary to determine relocation needs, or other assistance for which displaced persons may be eligible;
- e) Coordinate code enforcement with rehabilitation and housing assistance programs;
- f) Stage the rehabilitation of apartment units to allow tenants to remain in the building/complex during and after rehabilitation by working with empty units or buildings first; and
- g) Replace housing units one for one, which meet the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (24 CFR 42.375).

Any residential tenant who will be permanently and involuntarily displaced shall be entitled to the following services and benefits:

- a) Timely Information. The tenant will be contacted and provided timely information that fully explains the reason for the displacement and the relocation assistance available;
- b) Advisory Services. The tenant will be provided appropriate advisory services necessary to minimize hardships in adjusting to the relocation;
- c) Advance Notice. Unless there is an urgent need for the property (e.g., substantial danger to a person's health or safety) or the tenant is evicted for cause, the tenant shall be given at least 90 days' advance notice of the earliest possible date which they must vacate the property;
- d) Replacement Housing Assistance. Replacement housing assistance is available to both renters and owners in the form of rental assistance or purchase assistance. The replacement assistance is based on a number of factors as provided in the Uniform Relocation Act and its regulations at 24 CFR Part 24; and,
- e) Moving Expenses. The tenant will be reimbursed for reasonable, documented costs of his/her moving and related expenses, or the tenant may elect to receive a fixed payment for moving and related expenses.

#### **14. Contingency Plan in the Event of an Emergency or Disaster**

In the event of an emergency or disaster that presents a serious and immediate threat to the health and welfare of our citizens, the noticing requirements for public comment on plans or amendments may be reduced to five calendar days, or as required by state and federal guidelines. Any reprogramming of funds in the event of such an emergency will require review by the Urban County Policy Board. Documents may not be available for review in-person, but will otherwise be made available.

October 3, 2002  
 Adopted by the Board of County Commissioners November 26, 2002  
 UCPB meeting location change, April 15, 2003  
 CHRB meeting location change, September 15, 2004  
 Applications no longer available via website, September 15, 2004  
 New Department of Community Service location, February 2, 2007  
 Disbanded HOME Consortium, July 1, 2009  
 Updates throughout plan, October 11, 2011  
 Updates through plan, August 21, 2015  
 Contingency in the event of disaster, April 20, 2020