
2020 - 2024
City of Columbus Citizen Participation Plan

INTRODUCTION

The 2020-2024 Consolidated Plan is a collaborative process through which the community identifies its housing, homeless and community development needs and establishes a vision, goals and strategies for addressing these needs. The plan also identifies how the money received from the U.S. Department of Housing and Urban Development (HUD) will be spent over the upcoming program year – taking into account the regulations governing the programs – to meet locally identified needs.

The City of Columbus is required by law to have a detailed Citizen Participation Plan that contains the City’s policies and procedures for public involvement in the Consolidated Planning and Assessment of Fair Housing processes as well as the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunity for Persons with AIDS (HOPWA) monies. This Citizen Participation Plan was written in accordance with Section 91.105 of the U.S. Department of Housing and Urban Development’s Consolidated Plan regulations and is written for the Use of Funds from the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan must be available to the public.

Citizen participation is a vital part of the Consolidated Plan and Assessment of Fair Housing process. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to participate in the planning process. This includes:

- Access to meetings;
- Access to HUD provided and other supplemental data;
- Translation Services;
- Technical assistance as required;
- Public hearings to identify housing and community development needs and review of proposed uses of funds;
- A public review of program accomplishments and performance metrics; and
- Timely response to complaints and grievances.

The following describes the guiding principles for citizen participation by the City of Columbus in the implementation of the HUD Consolidated Plan and Assessment of Fair Housing.

Encouraging Public Participation

The law requires that our Citizen Participation Plan both provides for and encourages public participation, emphasizing involvement by low- and moderate-income people—especially those living in low- and moderate-income neighborhoods. Also, the U.S. Department of Housing and Urban Development (HUD) expects the city of Columbus to take whatever actions are appropriate to encourage participation of minorities, people who do not speak English, and people with disabilities. The city shall encourage the participation of local and regional institutions and other

organizations (including businesses, developers, and community and faith-based organizations) in the process of developing and implementing the consolidated plan. The city shall encourage, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments, in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located.

Copies of this Citizen Participation Plan, as well as summaries of basic information about CDBG, HOME, ESG, HOPWA and the Consolidated Plan and Assessment of Fair Housing process may be made available in the languages of residents who comprise a significant portion of the low and moderate income population.

The Role of Low Income People

The primary purpose of the programs covered by this Citizen Participation Plan is to improve communities by providing: decent housing, a suitable living environment, and growing economic opportunities—all principally for low- to moderate-income people.

Because the amount of federal CDBG, HOME, ESG, and HOPWA money the City of Columbus receives each year is mostly based upon the severity of both poverty and substandard housing conditions in Columbus, it is necessary that public participation genuinely involve low- moderate-income residents who experience these conditions. Genuine involvement by residents must take place at all stages of the process, including:

- Identifying needs.
- Setting priorities among these needs, suggesting how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs.
- Overseeing the way in which programs are carried out.

The Various Stages of the Consolidation Plan Process

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general, these stages or events include:

1. Identification of housing and community development needs.
2. Preparation of a draft use of funds for the upcoming year called the proposed Annual Action Plan or the development of a proposed new Multi-Year Strategic Plan.
3. Formal approval by elected officials of a final Annual Action Plan or Multi-Year Strategic Plan.
4. On occasion during the year, it might be necessary to change the use of the money already budgeted in an Annual Action Plan, or to change the priorities established in the Multi-Year Strategic Plan. In that case, a formal Substantial Amendment will be proposed, considered, and acted upon.
5. After a program year is complete, the Consolidated Annual Performance and Evaluation Report (CAPER) must be drafted for public review and comment.

The Program Year

The program year chosen by the City of Columbus is January 1 through December 31.

COLUMBUS CITIZEN PARTICIPATION ACTIVITIES

The City of Columbus Citizen Participation activities will include:

- Community Outreach;
- Public Hearings;
- Access to Information;
- Technical Assistance; and
- Timely Response to Complaints and Grievances.

Community Outreach – In order to assure that all citizens have the opportunity to participate in the planning process, the city of Columbus will conduct community outreach on the development of the strategic plan. The public will be notified of any action related to this grant via public notices; these notices may be posted in public locations around the City of Columbus, or contain in the legal section of a newspaper of mass circulation. The objectives of outreach will be to:

- Obtain views of citizen, public agencies and other interested parties;
- When applicable, announce the availability of technical assistance and funds;
- Respond to proposals and comments at all stages of the Consolidated Plan and Assessment of Fair Housing submission process, including:
 - ◆ Identifying housing and community development needs,
 - ◆ Reviewing proposed uses of funds, and
 - ◆ Reviewing program performance.

Public Hearings – The City of Columbus will host a minimum of two (2) Consolidated Plan or Annual Action Plan public hearings every year. Typically, one of these hearings may consist of either: 1) a meeting to announce the availability of technical assistance and funding for current program year; 2) a meeting to review program performance; or 3) a public hearing of the draft plan to solicit comments on the strategies and proposed use of funds. Public hearings will be conveniently timed and located for people who will benefit from program funds, and will be accessible to persons with special needs. No later than the date of the first public hearing, the HUD-provided data and other supplemental data will be made available to residents, public agencies, and other interested parties.

In years where an Assessment of Fair Housing is in development concurrently with the Consolidated Plan or Annual Action Plan, the Assessment of Fair Housing will require two public hearings at specific points in the process that are not likely to overlap with the two regularly-scheduled hearings. One hearing will be held during the development of the Assessment of Fair housing, and the second hearing will be held after the public comment period.

Access to Information – For at least thirty (30) days, 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 submission concerning any of the following documents:

- The proposed and final Annual Action Plans.
- The proposed and final Multi-Year Strategic Plan (the "Consolidated Plan.")
- The "Assessment of Fair Housing."
- Proposed and final Substantial Amendments to either an Annual Action Plan or the Multi-Year Strategic Plan.
- Annual Performance Reports.
- The Citizen Participation Plan.

Interested parties may access these documents at no cost through the internet, at the Columbus, Department of Finance and Management, Grants Management website; or by contacting city staff. The city will make every attempt to provide these materials in a form accessible to persons with disabilities and in a style for individuals that do not speak English, when requested.

Citizens will be provided fifteen (15) days to comment on the City's CAPER, prior to HUD submittal on March 31st of each year.

Technical Assistance - City staff will work with organizations and individuals representative of low- and moderate-income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact city staff for technical assistance. Additionally, city staff will work with individuals and organizations receiving Consolidated Plan and Assessment of Fair Housing monies to ensure that funds are being spent for their intended purpose and within the rules and regulations of the federal government.

Timely Response to Complaints and Grievances - City staff will provide timely, written responses to written complaints and grievances within fifteen (15) days of receipt, where practical.

SUBSTANTIAL AMENDMENTS

Prior to the submission of any substantial change in the proposed use of funds, citizens will have 30 day notice of, and the opportunity to comment on, the proposed amendment using the citizen participation methods outlined in this plan and/or other methods that result in effective notice and comment.

A substantial amendment to the Consolidated Plan and Assessment of Fair Housing is when one of the following decisions is to be made:

1. An increase or decrease in funding for a project by more than 20%.
2. The deletion of a project originally described in the Annual Action Plan.
3. The addition of a project not originally described in the Annual Action Plan.
4. A change in the purpose of a project, such as a change in the type of activity or its ultimate objective - for example, a change in a construction project from housing to commercial.
5. A meaningful change in the location of a project.
6. Any addition or deletion of the priority needs or goals in the Consolidation Plan or the impediments in the Assessment of Fair Housing.

For more information regarding the 2020-2024 Consolidated Plan and Assessment of Fair Housing or to submit your comments, please contact Carolyn Thurman at cnthurman@columbus.gov, or call 614.645.8069, or write to City of Columbus, Department of Finance and Management, Grants Management, 90 W. Broad Street, Columbus, Ohio 43215 or visit the city's Department of Finance and Management website at: <http://columbus.gov/Templates/Detail.aspx?id=544>

Addendum 1 – City of Columbus Citizen Participation Plan Addendum, September 2020

Per federal regulations at 24 CFR 91.105, the City of Columbus has adopted 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 City’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 City 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 the City of Columbus to amend its Citizen Participation Plan 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 City’s 2020 program year. The City will shorten its public comment period from 30 to 5 days. If the City wishes to make further amendments to prior plans following the 2020 program year, the City 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), HOME Investment Partnership, Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With Aids (HOPWA) 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.

Addendum 2 – Citizen Participation Plan Addendum, September 2020

Since the implementation of the 2020 – 2024 City of Columbus Citizen Participation Plan staff changes have occurred. The new point of contact for Citizen Participation at the City of Columbus, Grants Management Division is Lucie McMahon, LMMcMahon@Columbus.gov, 614-645-7492.