

A summary of changes to the Citizen Participation Plan for the City of Urbana:

Revised on May 14, 2020 to:

- Include virtual hearings as an allowed method for citizen participation when necessary for public health reasons;
- Provide a minimum 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus;
- Make minor edits that do not change current citizen participation policies. (Please be advised that if virtual hearings are used, real-time responses and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible.);
- Include provisions relative to the Consolidated Planning process and participation waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act;
- Include provisions relative to the Community Development Block Grant (CDBG) and other applicable U.S. Department of Housing and Urban Development funding made available under the CARES Act;
- Update information for the City-Contact Person.

**THE CITIZEN PARTICIPATION PLAN
CITY OF URBANA AND URBANA HOME CONSORTIUM
CONSOLIDATED PLAN,
THE ASSESSMENT OF FAIR HOUSING (AFFH)
AND ANNUAL PERFORMANCE REPORT**

Purpose

The Consolidated Plan is a U.S. Department of Housing and Urban Development (HUD) requirement that combines the planning and application process for existing HUD grants: (1) the Community Development Block Grant (CDBG), (2) the HOME Investment Partnerships Program (HOME), (3) the Emergency Solutions Grants Program (ESG), and any new funding that may become available.

In effect, the Consolidated Plan examines the current housing situation, explores the housing and community development needs of the state, and sets priorities for spending HUD grant funds. Public comment is a vital component of exploring the City's and Consortium housing and community development needs and setting spending priorities. The Consolidated Plan offers the opportunity for strategic statewide planning to occur alongside citizen participation.

HUD requires development of a Citizen Participation Plan that outlines policies and procedures of how the state intends to solicit citizen participation. The primary goal is to provide citizens, especially low and moderate income residents, an opportunity to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. The following information is to outline and define the citizen participation process.

The agency contact for the Consolidated Plan and this Citizen Participation Plan is:

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Lead Agency

The City of Urbana, through the Grants Management Division of its Community Development Services Department, acts as the lead agency for the Urbana HOME Consortium. As such, Urbana staff took the lead role in developing the *City of Urbana and Urbana HOME Consortium Consolidated Plan for Program Years 2015-2019*, especially as it relates to policies, procedures, programs and activities, and other issues specifically involving the City.

However, overall development of the Consolidated Plan was a cooperative effort involving the City of Urbana, the City of Champaign and the Champaign County Regional Planning Commission (representing the unincorporated areas of Champaign County). These regions are geographically contiguous and the areas of responsibility of the entities tend to overlap. These factors have contributed to an open and cooperative relationship among the municipalities that extends to both staff and elected officials. This cooperation is essential in assessing and attending to the needs of the greater community, and is the foundation for the Consortium's successes.

Consultation

When preparing the Consolidated Plan, Annual Action Plans, or the development of the Assessment of Fair Housing (AFH), consultation is made with public and private agencies that provide housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

Consultation with state-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws. This process shall also encourage the participation of local, regional, and statewide institutions including Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

In addition to the municipalities, a number of public and private entities play key roles in the health of the community. The Consortium makes every effort to include these organizations in the planning and implementation of the Consolidated Plan. A full list of these organizations is located in Appendix B.

Consultation

Public Outreach – As a Leader

Input from the public was sought through public hearings, open houses and focus groups. Meetings or workshops were presented in various forums and were designed to obtain information and perspective on many of the core issues addressed in the Consolidated Plan. Specific demographic groups/focus areas targeted included:

- Housing & Neighborhood Needs
- Youth & Social Services
- Seniors & Special Needs
- Homeless

Public Outreach – As a Participant

The Consortium regularly participates in a number of meetings of community organizations, cooperatives, etc. occurring on a monthly, quarterly, or other regular basis, in order to develop and maintain partnerships with other community organizations. These meetings provide continual feedback on the needs and trends in the community, as well as opportunities for the Consortium to disseminate

information about the programs and services it provides. Staff members of the Consortium entities often serve on committees and sub-committees, taking a very active and visible role in the community.

Such participation includes the meetings of the following organizations*:

- Community Reinvestment Group
- Local Funders Group
- Senior Task Force
- United Way Needs Assessment
- Latino Partnership
- Human Service Council
- Continuum of Care
- Council of Service Providers to the Homeless
- PACE Homeownership Coalition
- Housing Authority of Champaign County
- Housing Action Illinois Coalition
- Central Illinois Apartment Association

*More information about these groups can be found in Appendix B.

Consultations with housing and social service agencies

In addition to maintaining open lines of communication with various agencies that provide services in the community, the Consortium will on occasion have the opportunity to utilize resources developed by these organizations. Listed below are several examples of such opportunities.

1. City of Urbana Consolidated Planning Process

This four-year planning process was the most significant driver that provided information and insight into the preparation of the Consolidated Plan. The process was very complete and provided a significant amount of citizen participation. One of the single most important components of the plan was the formulation of a “Vision Statement” for the City:

Urbana is a diverse, progressive community comprising a mosaic of unique neighborhoods. It benefits from exceptional housing opportunities, schools, parks and businesses and from being the seat of government for Champaign County. Urbana’s values are personified by its cultural diversity, small-town feel, tree-lined streets, historic downtown, civic amenities and as the home of the University of Illinois. Urbana will promote healthy, balanced growth while preserving its community heritage. Appropriately designed infill development will be encouraged to help revitalize the built urban environment, while new growth areas will be developed in a contiguous, compact and sustainable manner.

2. Continuum of Care Strategic Plan 2015-2019

In 2015 the Continuum of Care, a group of community stakeholders dedicated to alleviating homelessness in Champaign County, organized a set of strategies to address homeless needs in the area. The resulting report provides a chronological strategy for methods of prevention, coordination and maintenance of homeless services, and evaluation of current tactics. See Appendix G for a full list of the goals and strategies to be implemented.

3. Review of the Countywide Needs Assessment of Public Input on the 2005 Three-Year Plan

The Champaign County Regional Planning Commission released the *Champaign County Statistical Abstract 2005*. This analysis provided a significant amount of background, statistical data and analysis that aided with the preparation of the Consolidated Plan.

4. Housing Authority of Champaign County (HACC) Plan

- HACC Five Year Move to Work Plan/Annual PHA Plan for 2015-2019

F. Citizen Participation Process

Consortium

Summary of Participation Process in Developing this Consolidated Plan

In August of 2014, the schedule for the Consolidated Planning Process was made available to the public at the regular Urbana Community Development Commission meeting. Future focus groups, public hearings, and open houses were also posted on the City of Urbana website calendar for public review.

In October of 2014, the City of Urbana and the Urbana HOME Consortium hosted five separate focus groups to discuss three different areas of concern to the community. These areas included: *Housing & Neighborhood Needs, Youth & Social Services, Seniors & Special Needs, and Homelessness*. The *Seniors and Special Needs* focus group was held at one of the local Public Housing units. Invitations were sent out to local community stakeholders in an effort to gather input on the needs and gaps in the community, and all meetings were held in locations accessible to persons with disabilities.

In January of 2015, the City of Urbana and Urbana HOME Consortium hosted a public hearing/open house event in each of the four census tracts within the City of Urbana Community Development Target Area. The hearings were designed to obtain resident input regarding community development and housing needs. These hearings were announced in the *Champaign-Urbana News-Gazette* and through the Grants Management Division newsletter, which was mailed to approximately 3,000 households. Instructions for non-English speaking persons requiring arrangements for a translator were posted in each notice.

In addition to the above measures, the City of Urbana also hosted two public hearings on the Consolidated Plan at public meetings. The first was held in November prior to a regular Community Development Commission meeting to obtain preliminary comments from the public before a draft was underway. Another was held in March at the start of a Community Development Commission meeting to review the Draft of the Consolidated Plan further along in the development stage. A thirty-day comment period was held from February 22, 2015 to March 23, 2015. Notes and minutes from each of the meetings is available for review in Appendix B.

If virtual hearings are used, real-time response and accommodation for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible. Also the virtual hearing method will only be used in lieu of in-person hearings if national or local health authorities recommend social distancing and limited public gatherings for public health reasons.

Citizen Participation Plan

Citizen participation is a key component of the decision-making process in all Consortium programs. Citizen participation is particularly important to the Community Development Block Grant and HOME Programs as these programs provide funds for neighborhood development and redevelopment. Without citizen input into these activities, the Consortium would have no means of gauging public opinion on past performance of these programs nor would the Consortium be able to schedule future activities conducive to the needs of its residents.

This Citizen Participation Plan identifies the minimum levels of citizen participation activities which will be undertaken by the Community Development Commission and the Grants Management Division as they implement the City's CDBG, HOME, and related community development programs. The Community Development Commission and Grants Management Division are encouraged to exceed these minimum levels whenever staffing and funding allow. The City of Urbana, through its Community Development Commission and Grants Management Division, has provided and will continue to provide citizens with opportunities to participate in planning, implementing, and evaluating the Consolidated Plan and Annual Action Plans. Through the Grants Management Division, the City provides information to citizens, holds public hearings to obtain input of residents, and provides citizens with opportunities to comment on the activities of the Consolidated Plan/Annual Action Plans.

For purposes of this Citizen Participation Plan, the CDBG, HOME, and related community development programs are collectively referred to as the "Community Development Program." The Consortium and the City of Urbana, as lead entity, provide for citizen participation throughout all stages of the Community Development Program. This includes citizen involvement in the development of the Citizen Participation Plan, and any amendments to this Plan, as well as involvement in the areas discussed below.

Consolidated Plan/Annual Action Plan Development

Citizens are involved in the development of the Consolidated Plan, including Annual Action Plans and any substantial amendments.

Consolidated Plan Implementation

Citizens have an opportunity to be involved in policy decisions regarding program implementation via the Community Development Commission.

Assessment of Consolidated Plan Performance

Citizens and citizen organizations are given the opportunity to assess and submit comments on all aspects of the Consolidated Plan, Annual Action Plans, and Performance Reports, including the performance of any program subgrantees. Citizens are also given the opportunity to assess projects and activities to determine whether Consolidated Plan strategies and specific objectives are being achieved. Citizens have opportunities to assess performance through public hearings and meetings, contact with the Community Development Commission, and contact with the Grants Management Division staff.

The Urbana Community Development Commission (CDC)

The CDC is comprised of nine Urbana residents appointed by the Mayor with consent of City Council. Appointees serve three-year renewable terms. The following excerpt from the By-Laws of the CDC explains the purpose of this body:

The purpose of the Community Development Commission is to develop and recommend to the Urbana City Council a community development plan; advise the City Council on community development goals, objectives, and resource allocations; monitor and evaluate community

development activities; receive citizen input; and represent the population in community development activities.

Considering the above purpose, the CDC members make recommendations to the Urbana City Council on issues related to the Community Development Program, including but not limited to the following*:

- Identification of housing and non-housing community development needs of low-income persons and persons with special needs such as homeless persons and non-homeless persons requiring supportive housing;
- Identification of strategies and specific objectives to address housing and community development needs;
- Establishment of programs and activities to further housing and community development strategies and specific objectives;
- Recommendation of CDBG and HOME program activities and budgets;
- Scheduling of Consolidated Plan/Annual Action Plan preparation and public hearings;
- Evaluation of program effectiveness;

The Grants Management Division provides staff support for the Community Development Commission. The Grants Management Division Manager or his/her appointee then communicated CDC recommendations to the Mayor and City Council.

**Note: Additional approval by certain advising boards and commissions, as well as the Champaign City Council and/or the Champaign County Board may be in order. The process in these cases is essentially the same.*

The CDC meets on the fourth Tuesday of each month at 6 p.m. at the Urbana City Building Complex. During preparation of the Consolidated Plan/ Annual Action Plans, the CDC holds special meetings as necessary, in addition to the regular monthly meeting. All meetings of the Commission are open to the public.

Public Hearings and Plan Submission

This Citizen Participation Plan provides for hearings to obtain citizen views at different stages of the Community Development Program. Hearings are held at times and locations which permit broad participation by all residents, particularly low-income persons. Public hearing arrangements facilitate the full participation of persons with disabilities, non-English speaking citizens, and elderly residents. All hearings are held facilities accessible to persons with disabilities.

Because many CDBG and HOME activities are targeted toward residents of low-income neighborhoods, some hearings are located at sites within these neighborhoods for the convenience of their residents. Because success of the Community Development Program depends in large part on cooperation of other housing and social service agencies, some hearings may be held at times and places convenient to representatives of those agencies.

Initial Consolidated Plan/Annual Action Plan Hearings

The City/Consortium makes available to citizens, public agencies, and other interested parties information that includes the amount of assistance it 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 low- and moderate-income persons. This information is provided and made available once a proposed public hearing/meeting schedule is determined. The City/Consortium holds at least five

(5) hearings prior to beginning work on the Consolidated Plan and yearly Annual Action Plans. Purposes of the hearings are to obtain comments on housing and non-housing community development needs, to obtain comments on program progress and performance, and to obtain proposals for use of CDBG and HOME funds for the next fiscal year. Four (4) hearings are held in neighborhoods targeted for CDBG assistance. At least one (1) hearing is held at a time and place convenient to social service agency representatives.

Draft Consolidated Plan/Annual Action Plan Hearing

The City/Consortium holds at least one (1) hearing to receive comments on the draft Consolidated Plan/Annual Action Plan. The hearing is held at least 30 days before submittal of the Consolidated Plan/Annual Action Plan to HUD. All comments received regarding the draft plan, whether written or verbal, is considered by the City/Consortium in preparing a final document for submittal to HUD. A summary of comments and City/Consortium responses is included with the final submittal.

Substantial Program Amendments

The City/Consortium provides citizens at least 30 days to comment on any proposed substantial amendment prior to taking final action on the proposed amendment. The Grants Management Division holds at least one (1) public hearing on any proposed substantial amendment to an adopted Consolidated Plan/Annual Action Plan. An amendment to the Plan is considered substantial if it meets any one of the following four criteria:

- The amendment proposes to use either CDBG or HOME funds for one or more activities which were not approved as part of the Consolidated Plan/Annual Action Plan submittal;
- The amendment proposes to alter the purpose, location, or class of beneficiaries of activities included in the Consolidated Plan/Annual Action Plan;
- The amendment proposes to reduce or increase expenditures for any activity included in the approved Annual Action Plan by more than fifty (50) percent or \$50,000, whichever is greater, of the total amount shown for that activity in the approved Plan;
- The amendment proposes a strategy not included in the approved Consolidated Plan.

The City/Consortium notifies HUD in writing of any substantial amendment adopted by City Council. Any proposed amendments to the Consolidated Plan/Annual Action Plan not meeting the foregoing definition of "substantial amendment" may be authorized by City Council without special public notice or public hearing. ***The CARES Act made available additional funding in Community Development Block Grant Coronavirus (CDBG-CV) funds. The CARES Act adds additional flexibility for both the CDBG-CV grant and, in some cases, for the annual HUD FY2019/2020 CDBG grants. The public comment period is reduced to not less than 5 days, grantees may use virtual public hearings when necessary for public health reasons, the public services cap is suspended during the emergency, and States and local governments may reimburse costs of eligible activities incurred for pandemic response regardless of the date.**

In addition, the CARES Act authorizes the Secretary to grant waivers and alternative requirements of statutes and regulations the Secretary administers in connection with the use of CDBG-CV funds and HUD FY2019 and FY2020 CDBG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). Waivers and alternative requirements can

be granted when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.

These edits do not change current citizen participation policies but have been modified to allow for necessary expedited actions during times of declared disaster or emergencies.

The City/Consortium gives adequate notice of all public hearings using one or more of the following methods:

- Residents of CD Target Area for expenditure of CDBG funds are notified of Consolidated Plan/Annual Action Plan public hearings by direct mailing of the City newsletter, *Neighborhood News*. (This applies only to Urbana.)
- The City/Consortium publishes a display advertising notice of each hearing in legible type in the non-legal/non-classified section of the *Champaign-Urbana News-Gazette* at least 14 days prior to each hearing.
- The City/Consortium displays a notice of each hearing on the City of Urbana website and the City of Urbana Events Calendar at least 14 days prior to each hearing.

Notices indicated above indicate the date, time, place, and purpose of each hearing. Public notices of preliminary Consolidated Plan/Annual Action Plan hearings include the following information:

- The amount of CDBG and HOME funds available to the City and HOME Consortium members for community development and affordable housing activities, including the annual grant, program income, and miscellaneous funds;
- The range of activities that may be undertaken with CDBG and HOME funds and examples of activities previously funded through these programs;
- The process for drafting and approving the Consolidated Plan/Annual Action Plan, including a schedule of meetings and hearings;
- The role of citizens in development of the Consolidated Plan/Annual Action Plan;
- A summary of important program requirements;
- Information indicating how citizens can obtain summaries, approved by Resolution of the City Council, of the City/Consortium's most recent Consolidated Plan draft, budget and multi-year fiscal plan.

At the time notices are published in the newspaper, copies of the newspaper text are mailed electronically to appropriate neighborhood organizations and social service agencies involved with the Community Development Program in Urbana, including the Housing Authority of Champaign County.

The City/Consortium sends a notice of availability of copies of the draft Consolidated Plan/Annual Action Plan electronically to appropriate neighborhood organizations and social service agencies, including the Housing Authority of Champaign County, along with the notice of public hearing on the draft plan.

***For projects utilizing CDBG funding under HUD FY 2019-2020 and FY 2020-2021, and the CARES Act CDBG-CV funding, the City of Urbana may provide a 5-day notice/comment period for proposed amendments necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus.**

Access to Information

The City/Consortium provides the public full access to program information and makes an affirmative effort to provide adequate information to citizens, particularly low-income residents residing in

neighborhoods targeted by the Community Development Program. The Consolidated Plan/Annual Action Plan as drafted and adopted, substantial amendments as proposed and adopted, and performance reports as proposed and approved are available to the general public. Upon request, these materials are made available in a form accessible to persons with disabilities and non-English speaking persons in electronic format.

The City/Consortium provides full and timely disclosure of its program records and information consistent with Federal, State, and Local laws regarding personal privacy and confidentiality. Citizens may review documents relevant to the Community Development Program upon request at the Grants Management Division office during normal working hours (Monday through Friday, 8:00 a.m. to 5:00 p.m.).

When the Consolidated Plan/Annual Action Plan has been received and approved by HUD, the City/Consortium may publish a notice in the *Champaign-Urbana News-Gazette* or on the City website stating that the document has been received and approved by HUD and is available to interested parties upon request.

Performance Reporting

The City/Consortium provides citizens with opportunities to comment on draft performance reports prior to their submittal to HUD. The City/Consortium publishes a notice in the *Champaign-Urbana News-Gazette* announcing availability of a draft Performance Report. The notice is published in the non-legal/non-classified section (display advertisement) of the newspaper at least 14 days prior to its submission to HUD. Copies of the draft report are mailed to appropriate neighborhood organizations and social service agencies involved with the Community Development Program. A summary of comments received by the City/Consortium on the Performance Report is attached to the report submitted to HUD.

Copies of proposed and approved Consolidated Plans/Annual Action Plans, Performance Reports, and substantial amendments to the plan are available for public review on the City of Urbana website at www.urbanaininois.us and at the following location:

- City of Urbana, 400 South Vine Street, Urbana
Grants Management Division
City Clerk's Office
- Urbana Free Library, 210 West Green Street, Urbana
- Housing Authority of Champaign County, 205 West Park Avenue, Champaign
- Champaign County Regional Planning Commission, 1776 E. Washington Street, Urbana

The City of Champaign is responsible to make the Plans and Reports available at the following locations:

- Champaign Public Library, 200 West Green Street, Champaign
- City of Champaign, 102 N. Neil Street, Champaign, Neighborhood Services Department Information Desk

Information regarding the Community Development Program, including notices of public hearings and availability of draft documents, are provided to Housing Authority of Champaign County Commissioners and Executive Staff as well as to representatives of public housing resident councils on a timely basis to afford the Housing Authority and its tenants an opportunity to provide input into the program.

Submission of Comments and Proposals

The City/Consortium encourages submission of comments and proposals concerning the Community Development Program by all citizens, particularly low-income persons and residents of low-income neighborhoods. This includes submission of comments to City staff, the Community Development Commission, and to City Council.

In notices of public hearings regarding preliminary and draft Consolidated Plans/Annual Action Plans, the City/Consortium makes clear the availability of CDBG and HOME funds to eligible subrecipients. Notices describe the process by which organizations may apply for CDBG and HOME funds from the City/Consortium. For full consideration, all proposals must be addressed to the City in care of the Grants Management Division.

The City/Consortium provides timely responses to all comments and proposals submitted to the Grants Management Division, including written responses to written comments and proposals stating the reasons for actions taken by the City/Consortium on the comments and proposals. All responses are made within 15 working days of submission of comments and proposals.

Anti-Displacement Concerning CDBG and HOME Funded Programs

When implementing programs and activities included in its Consolidated Plan/Annual Action Plan, the City minimizes displacement of persons and businesses. Whenever possible, projects are sited and/or timed to minimize the number of persons who must be relocated to accommodate the projects. Whenever possible, specific vacant properties targeted by the City/Consortium for acquisition and clearance are acquired to prevent displacement.

In the event that an activity undertaken by the City/Consortium with CDBG, HOME, or other Federal funds results in displacement of a homeowner, tenant, or business, the City/Consortium provides technical and financial assistance to the person or business owner in accordance with the Federal Uniform Relocation Act and with Section 104(d) of the Housing and Community Development Act of 1974, as amended. Grants Management Division staff provide each person and/or business owner to be relocated with information regarding the relocation process and relocation assistance for which the person or business owner may be eligible. Staff provide this information both verbally and in writing in a manner easily understood by the client.

Technical Assistance

The City/Consortium provides technical assistance at the level and of the type deemed appropriate by the Grants Management Division Manager. Technical assistance is provided to the CDC and to any neighborhood or area-wide organization so such organization may adequately participate in planning, implementing, and assessing the Community Development Program. Technical assistance is also provided to groups of low-income persons and to groups of residents of neighborhoods targeted by the CDBG Program to help such groups complete written comments and funding proposals in connection with the Community Development Program.

Technical assistance is provided either directly or through arrangements with other public or private agencies. All requests for technical assistance should be made to the Grants Management Division Manager, 400 South Vine Street, Urbana, Illinois 61801 or sedodd@urbanaininois.us.

Complaints

Complaints regarding the Community Development Program should be addressed to the Grants Management Division Manager, 400 South Vine Street, Urbana, Illinois 61801 or

sedodd@urbanaininois.us. The Grants Management Division Manager responds to any written complaint within 15 working days of its receipt.

Summary of Comments from Public Hearings

A summary of the comments provided at the public hearing is included in Appendix C. Also included is copy of the sign-in sheets from the public hearing events.

Summary of Efforts to Broaden Public Participation

The City of Urbana publishes information concerning the Consolidated Plan and Annual Action on the City website, www.city.urbana.il.us. The City of Champaign publishes information concerning the Consolidated Plan and Annual Action on the City website, www.ci.champaign.il.us.

Efforts are made to distribute copies of all documents related to the Consolidated Plan and Annual Action Plan to better reach minority and disabled persons in an effort to gain feedback on the planning documents. Such organizations include, but are not limited to:

- East Central Illinois Refugee Center
- Persons Assuming Control of Their Environment (PACE)
- Developmental Services Center (DSC)
- Latino Partnership
- NAACP Local Chapter

Explanation of Comments Not Accepted

All comments were accepted and are included in this Consolidated Plan.