



City of Elkhart

## **2020-2025 Citizen Participation Plan**

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The 2020 - 2025 Citizen Participation Plan details the public participation and community involvement activities related to the development of the Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, Performance Reports, and future amendments of such plans.

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## INTRODUCTION

The Citizen Participation Plan (CPP) outlines the methods and procedures the City of Elkhart will use to solicit community feedback and engagement when developing plans and priorities for funds received by the U.S. Department of Housing and Urban Development (HUD). The CPP reflects the importance of community engagement while developing various neighborhood plans, programs and activities. The CPP also meets or exceeds the federal requirements found in 24 CFR 91.105.

## CONSOLIDATED PLANNING PROCESS

This section outlines how the City of Elkhart will ensure community engagement and participation while developing the Consolidated Plan.

Community engagement and participation is the foundation of Elkhart's community planning efforts. The City of Elkhart takes intentional steps and efforts to seek input and feedback in developing community plans, including the Consolidated Plan and Assessment of Fair Housing (AHF). There will be multiple points throughout the planning process that affords residents, public agencies and other stakeholders the opportunity to shape the Consolidated Planning process. Elkhart will use engagement techniques such as facilitated public meetings and forums, focus group interviews, and online and paper-based surveys. Elkhart will also receive comments through informal discussions with stakeholders such as neighborhood associations through neighborhood meetings and phone or email communication.

### Public Planning Hearings, Meetings, Forums and Surveys

In order to engage residents and stakeholders during the development of the Consolidated Plan and AHF, the City of Elkhart shall facilitate a series of hearings, meetings, forums and surveys. The city will consider any comments or views of citizens received in writing, or orally in preparing the Consolidated Plan or Annual Action Plan.

#### Public Hearings

During the Consolidated Planning process, the City of Elkhart will hold at least one public hearing to gather input from residents, public agencies and other key stakeholders. The public hearings will generally be held at the Municipal Building, but may be moved to a neighborhood-based location. During the hearing, the City shall:

- Provide an overview of the CDBG and Fair Housing program
- Provide examples of past programs and eligible expenditures
- Seek input on housing and community development needs and non-housing community development needs

At a minimum, the public hearing shall be advertised at least 14 days prior to the meeting through the Elkhart Truth or other newspaper of general circulation. The City will notify key

constituents and public agencies of the hearing by letter or postcard and via email. The notice of the public hearing will also be posted on the City's website and/or social media accounts.

### Public Planning Meetings

Additional public planning meetings may be held throughout the development of the consolidated plan to gather additional public input. Subsequent public meetings shall be advertised on the City's website and/or social media account, direct email to prior participants, and email notices to public agencies and stakeholders.

### Public Planning Forums or Focus Groups

The City shall consult with community agencies, housing authorities, and subrecipients regarding needs within the community and needs of the clients served by the various agencies. This consultation can be done through focus groups or agency interviews.

### Community Surveys

The City of Elkhart shall also provide an alternative way for interested residents and community members, who cannot attend the public meetings, to comment on community needs and priorities such as through a community needs survey.

### Public Review of the Draft Consolidated Plan and AHF

The City of Elkhart will make a draft of the Consolidated plan available for public review and comment for a period of not less than 30 days. To ensure the community is aware of the funding available and proposed projects, the City of Elkhart shall publish the following information before the adoption of the Consolidated Plan:

- The amount of assistance the local government expects to receive (including grant funds and program income)
- The range of activities that may be undertaken
- The estimated amount of funding that will benefit persons of low- and moderate-income
- The local government's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the local government will make available (or require others to make available) to persons displaced, even if the local government expects no displacement to occur; and locations where the draft plan will be available

The City shall make the draft plan available free of charge online and in printed form. To inform residents and stakeholders that the plan is available for review and comment, the City shall:

- Publish a summary of the proposed Consolidated Plan in the Elkhart Truth describing the contents and purpose of the Consolidated Plan, and locations where the entire plan may be examined

- Place an electronic copy of the plan on the City’s website
- Make printed copies available at: Elkhart Municipal Building, Elkhart City Library branches, and the Tolson Center.
- Notify public agencies and stakeholders via email that the plan is available for review and comment.

## **ANNUAL ACTION PLAN**

The Annual Action Plan (APP) public participation process is similar to that of the Consolidated Planning process. At least one public hearing and one public meeting will be held during the planning process to identify needs and gather input regarding CDBG projects and funds.

A draft plan will be published and a 30-day public comment period will be observed. During this public comment period, two additional meetings will be held to provide a formal setting at which the public may make comment on the draft AAP. These comments will be addressed and included in the plan documents. After the 30-day public comment period is complete, the plan will be approved by the Mayor of Elkhart and presented to the Elkhart Common Council for approval of its submission to the Indianapolis Field Office for review no later than 45 days prior to the beginning of the program year, on or about May 15<sup>th</sup> of each year.

## **AMENDMENTS TO THE CONSOLIDATED PLAN, ANNUAL ACTION PLAN OR ASSESSMENT OF FAIR HOUSING**

Amendments to the Consolidated Plan and AFH will be made public, and the City will notify HUD when the amendment has been made. The City will submit a copy of each amendment to HUD as it occurs.

### **Criteria for Substantial Amendment to the Consolidated Plan**

The City of Elkhart will use the following criteria for determining what changes in the planned or actual activities of the Consolidated Plan constitute a substantial amendment:

- The complete elimination of an activity (budget line item) from the Community Development Block Grant program
- An increase in any budget line item of more than twenty-five (25) percent of the line item allocation and the subsequent reduction in another budget line item (substantial changes in the use of CDBG funds from one eligible activity to another)
- Any major programmatic changes in the structure of the HUD Community Development Block Grant program and public housing system that directly affects the distribution of program funds in Elkhart.

## Revising an Accepted AFH

The accepted AFH may be revised in cases where:

- A material change has occurred that affects the fair housing priorities and goals no longer reflect actual circumstances. This could include sudden natural disasters which preclude affirmatively furthering fair housing, significant demographic changes, or court orders.
- Upon written notice from HUD specifying a material change that requires a revision.

Any of these changes will constitute a substantial amendment to the Consolidated Plan and AFH and require that the City follow the citizen notification of substantial amendments.

## Citizen Notification of Substantial Amendments

The City of Elkhart will notify residents and stakeholders if a substantial amendment to the Consolidated Plan or AFH is required. A summary of the proposed substantial amendment will be published in the Elkhart Truth and posted on the City of Elkhart's website. From the date of publication of this summary, the City will provide for a 30-day comment period in which the citizens of Elkhart will have the opportunity to provide their comments and views on the proposed substantial amendment. During this public comment period, the City will hold one (1) public hearing at which the residents of Elkhart can express their comments and views. A copy of the substantial amendment will be available to any resident or interested party requesting it. Copies of the substantial amendment will be made available to the public on the City's website or from the Community and Redevelopment Office upon request.

The City of Elkhart will consider any comments or views of citizens received in writing or orally at the public hearings in preparing substantial amendments to the Consolidated Plan, Annual Action Plan, or Assessment of Fair Housing.

## Disaster or Public Health Emergency Declaration and Funding

In situations where a natural disaster, public health crisis, or other emergency situation arises and HUD issues updated guidance, or special-use funding surrounding that particular emergency or event, the City of Elkhart will follow the revised HUD guidance when amending the Consolidated Plan or Annual Action Plan. In such an event, the City of Elkhart will:

- Follow the revised HUD authorization related to the minimum required public comment period.
- Expedite, as prescribed by HUD, the public notification and public hearing process.
- Undertake additional measures, authorized by HUD, to expedite the use of HUD funds to mitigate the effects of the disaster or emergency within the community.

The City of Elkhart will consider any comments or views of citizens received in writing or orally at the public hearings in preparing substantial amendments to the Consolidated Plan, Annual Action Plan, or Assessment of Fair Housing.

## **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)**

The City of Elkhart will produce an annual performance report which will review and report on the progress it has made in carrying out its strategic plan and the action plan. This performance report will include a description of the resources made available, the investment of available resources, the geographic distribution and location of investments, the families and persons assisted (including racial and ethnic status of persons assisted), actions taken to affirmatively further fair housing, and other actions indicated in the strategic plan and the action plan. The City of Elkhart will provide the citizens of Elkhart reasonable time and opportunity to comment on this annual performance report before it is submitted to HUD.

The performance report will be submitted to HUD within 90 days after the close of the program year, which is June 30. To provide reasonable notice to the citizens of Elkhart, the City will publish a notice of the report in the Elkhart Truth and on the City of Elkhart's website on or about sixty-five (65) days after the end of the program year. The City will provide a period of fifteen (15) days for the public to comment on the performance report during which the City will hold at least one public hearing to discuss the performance report. After the end of the public comment period, any comments will be addressed by City staff and included as part of the CAPER before the report is submitted to the Indianapolis HUD Field Office for review.

Copies of the draft and final documents will be available free of charge at Elkhart Municipal Building, all Elkhart City Public Library branches, the Tolson Center and on the City of Elkhart website.

The City of Elkhart will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the Consolidated Annual Performance and Evaluation Report.

## **PUBLIC HEARINGS AND MEETINGS**

The City of Elkhart will hold at least two public hearings throughout each program year. At least one public hearing will be held before the publication of the Annual Action Plan and a second during the CAPER review period. The purpose of the public hearings will be to obtain citizens' views and to respond to proposals and questions. Each of the public hearings will address housing and community development needs, development of proposed activities, and review of program performance. As part of the Consolidated Plan process, the City will hold one public hearing during the 30-day public comment period before the Consolidated Plan is published and submitted to HUD.

Each of the public hearings will be advertised at least two weeks (14 days) before it is scheduled to be held with a notice in the Elkhart Truth or other newspaper of general circulation. The City will also use the network of committees created to facilitate the development of the Consolidated Plan, receive citizen input, and inform the citizens of any proposed public hearing. Direct mailings will be used, to the City's best ability, to provide information regarding public

hearings to this existing network.

In general, public hearings and meetings will be held at the Municipal Building, which is centrally located. However, public hearings and meetings may at times be held in different locations throughout the City, particularly in those areas with concentrations of persons of low- and moderate-income. The locations of all public hearings will be included in the notice, and all public hearings will be in locations that are convenient to actual and potential beneficiaries, and locations accessible to persons with disabilities. All meetings will be held in facilities which are accessible to persons with disabilities.

Arrangements can be made through the Community and Redevelopment Department at least seven (7) working days before any public meeting for those persons requesting assistance for special needs. Assistance can include, but is not limited to, assistance for non-English speaking persons and for those who require a sign language interpreter. The City must receive reasonable time to respond to any such requests.

### **ACCESS TO RECORDS**

The Consolidated Plan as adopted, any substantial amendments, and the performance report will be made available to the public. Upon request, these documents will also be provided in a form accessible to persons with disabilities. These documents will be available for public inspection in the Office of the Community and Redevelopment Department during regular business hours. Persons requesting special assistance in regard to access of these documents must provide the City reasonable time in which to aid in accessing these documents. The documents will also be available on the City's website at [www.elkhartindiana.org](http://www.elkhartindiana.org).

The City will respond to any reasonable request for information and records relating to the City's Consolidated Plan for the preceding five (5) years. The City will provide this access to citizens, public agencies and other interested parties in a reasonable and timely manner. All requests for access to these records must be made in writing to the Community and Redevelopment Department, City of Elkhart, Municipal Building, 229 South Second Street, 46516.

### **TECHNICAL ASSISTANCE**

The City will hold mandatory technical assistance meetings to assist community groups and not-for-profit agencies who are interested in applying for CDBG funds. The City of Elkhart is committed to increasing the capacity of local agencies to become high-performing subrecipients, because the subrecipient agencies are a critical part of the CDBG program and its successful implementation.

In addition to the mandatory technical assistance meeting, the City of Elkhart will assist any groups with technical assistance related to the CDBG program, or the Assessment of Fair Housing.

## **COMPLAINTS**

The City of Elkhart appreciates feedback from concerned residents and agencies on all aspects of the CDBG program and Assessment of Fair Housing. All written comments received by the Community and Redevelopment Department will be considered. The City will respond to each written comment received at the Community and Redevelopment Department, City of Elkhart, Municipal Building, 229 South Second Street, Elkhart, Indiana 46516. The City will provide a timely, substantive written response to every written citizen comment within fifteen (15) working days. The City will work with residents to address any reasonable concerns to the best of its ability.