



CITIZEN PARTICIPATION PLAN

April 2020

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Introduction

St. Clair County, as a “Federal Entitlement Community,” is the recipient of funds through the U.S. Department of Housing and Urban Development (“HUD”) under two Federal Entitlement programs—the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. These two Federal Entitlement programs are operated under one "Consolidated Plan" that is adopted by the County and submitted to HUD every five years. The County's next Consolidated Plan will cover the period running from October 1, 2020 through September 30, 2024. In addition, each year the County adopts and submits to HUD an Annual Action Plan (Annual Plan) that describes the activities that will be funded through these two Federal Entitlement programs in the coming Program Year

St. Clair County's Program Year is October 1 through September 30.

The Consolidated Plan Rule (24 CFR Part 91) requires all Entitlement Communities to adopt a Citizen Participation Plan that sets forth the jurisdiction's policies and procedures for citizen participation. This Citizen Participation Plan must provide for and encourage citizens to participate in the development of the Five-Year Consolidated Plan, Annual Plans, any Substantial Amendments to Annual Plans, and the County's Consolidated Annual Performance Evaluation Report (CAPER). This Citizen Participation Plan is available to the public upon request.

Encouraging Citizen Participation

St. Clair County encourages its citizens to participate in the development of the Consolidated Plan, Annual Plans, any Substantial Amendments to Annual Plans and Consolidated Annual Performance Evaluation Reports. The County especially encourages participation by low-moderate income persons where the County has plans to use CDBG and HOME funds. In addition, St. Clair County takes whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The primary purposes of the programs covered by this Citizen Participation Plan are to improve communities by providing decent housing, a suitable living environment, and growing economic opportunities – all principally for the benefit of low- and moderate income people. Therefore, St. Clair County believes that low income people must be genuinely involved at all stages of the Consolidated Planning process, including:

- Identifying needs;
- Setting priorities among these needs, deciding how much money should be allocated to each high-priority need and suggesting the types of programs to meet high-priority needs; and
- Overseeing the way in which programs are carried out, including citizen review and comment on current year activities.

In consultation with the St. Clair County Housing Authority, the County also encourages the participation of residents of public and assisted housing developments in developing and implementing the Consolidated Plan. St. Clair County provides information to the Housing Authority about Consolidated Plan activities related to its developments and surrounding communities so the Housing Authority can make this information available at its annual public hearing required under the Comprehensive Grant program.

Citizen Comment on the Citizen Participation Plan and Amendments

St. Clair County provides citizens with a reasonable opportunity to comment on its Citizen Participation Plan and on Substantial Amendments to its Citizen Participation Plan. The County makes the Citizen Participation Plan public and available in a format that is accessible to persons with disabilities upon request.

Development of the Consolidated Plan

1. Identification of housing and community development **needs**.
2. Preparation of a draft use of funds for the upcoming year, and every five years, for a strategic plan for the next five years, called the **proposed Annual Action Plan** and the **proposed Five-Year Consolidated Plan**.
3. Formal approval by elected officials of a **final Annual Action Plan** and/or **Five-Year Consolidated 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 Five-Year Strategic Plan. In that case an **Amendment**, and sometimes a **Substantial Amendment**, will be proposed, considered and acted upon.
5. After a Program Year is complete, a **Consolidated Annual Performance Evaluation Report (CAPER)** must be submitted to HUD.

Before St. Clair County adopts a Consolidated Plan, it makes available to citizens, public agencies, and other interested parties, information that includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that are eligible for funding through these programs, including the estimated amount that will benefit persons of low- and moderate-income.

A summary describing the contents and purpose of the Consolidated Plan, and a list of possible locations where copies of the proposed Consolidated Plan may be examined, is published at least 30 days in advance (may vary based on waivers granted from HUD) of its submission to HUD on the St. Clair County website (www.co.st-clair.il.us) and in at least one newspaper of general circulation in St. Clair County, to afford citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The proposed Consolidated Plan may also be made available at libraries, government offices, and other public places. In addition, the County may provide a reasonable number of free copies of the Plan to citizens and groups that request it.

St. Clair County holds at least one public hearing either in person or virtually each year to obtain residents' opinions about community development and housing needs and what priority should be given to those needs, specifically for low and moderate income people. The County normally holds these public hearings at least 30 days prior to publishing a Proposed Annual Plan or Five-Year Consolidated Plan for comment. This allows the County to consider needs identified by citizens when drafting the Annual Plan and Five-Year Consolidated Plan.

Between thirty and sixty days after the last housing and community development needs public hearing, the County provides notice of a public hearing to review and comment on the Proposed Annual Plan and/or Consolidated Plan. This public hearing is held in person or virtually at least thirty days (may vary based on waivers granted from HUD) prior to the County's submission of the Annual Plan or Consolidated Plan to HUD for final approval (by July 17) so that low- and moderate-income people have an opportunity to examine it and submit comments. The Annual Plan or Consolidated Plan is submitted to HUD no less than 45 days prior to the beginning of the Program Year (by August 17).

The County considers any comments or views of citizens received in writing, by e-mail, or orally at an in person public hearing, in preparing the final Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, are attached to the final Consolidated Plan.

Copies of the Annual Plan and Five-Year Consolidated Plan as submitted to HUD, and a summary of the submission are made available to the public for free on the County website (www.co.st-clair.il.us), at the St. Clair County Intergovernmental Grants Department (IGD), and possible other public libraries, senior/community centers, and village/city halls throughout the County.

Anti-Displacement, Real Property Acquisition and Relocation Assistance Plan

St. Clair County does not intend to fund any activities that will cause the displacement of any persons and it is the policy of the County to take all necessary and appropriate steps to minimize displacement of persons as a result of activities assisted through its Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and other federally funded programs for which the County may be a recipient. The County takes the following steps to minimize displacement:

1. The County encourages developers participating in the County's development programs to build on vacant lots, rehabilitate vacant rather than occupied buildings, and/or rehabilitate occupied or partly occupied buildings in stages to minimize displacement.
2. The County encourages developers participating in the County's development programs to undertake housing developments with a mix of different levels of affordability, thereby ensuring an adequate supply of low and moderately priced housing units.

3. As funds are available, the County will continue to fund home repair programs that provide funds to eligible homeowners, including those required to correct building code-related deficiencies, thereby assisting residents to remain within their current homes and avoid displacement due to inability to maintain their residences.

St. Clair County requires that all developments financed with CDBG and/or HOME funds comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the “Uniform Act”), its implementing regulations at 49 CFR Part 24 (the Uniform Act Regulations), and the requirements of 24 CFR 570.606 (the CDBG Regulations) and/or 24 CFR 92.353 (the HOME Regulations). For more information regarding the County’s policy, please see Appendix A, *St. Clair County Anti-Displacement, Real Property Acquisition and Relocation Assistance Plan*.

Substantial Amendments

Whenever the County proposes to make a Substantial Amendment to the Consolidated Plan, it publishes a detailed description of the amendment as a “display advertisement” in at least one newspaper of general circulation in St. Clair County in a non-legal section of the newspaper. In addition, notices are sent to any person or organization requesting to be put on the mailing list. Notices are sent to neighborhood organizations, public housing resident groups, and religious organizations in low-moderate income neighborhoods and to agencies providing services to lower income persons upon request.

No Substantial Amendment will be submitted to HUD until the public has had at least 30 days (may vary based on waivers granted from HUD) to review and comment on it.

The County will consider any comments or views of citizens received by e-mail, in writing, or orally at public hearings, in preparing the proposed Substantial Amendment for submission to HUD. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, are attached to the Substantial Amendment submitted to HUD.

The Consolidated Annual Performance and Evaluation Report (CAPER)

Every year, within 90 days after the close of the Program Year (by December 29), St. Clair County must submit a performance and evaluation report (the “CAPER”) to HUD. This report describes how funds were actually used and the extent to which these funds were used for activities that benefited low- and moderate-income people.

The County holds public hearings in person or virtually on the CAPER concurrently with hearings on the Annual Plan and/or the Five-Year Consolidated Plan and another public hearing dedicated solely to review of the CAPER within 15 work-days before or after the end of the Program Year. This hearing is dedicated to securing public comment on programs and activities conducted during that Program Year.

A draft of the CAPER is made available to the public for review and comment on the County website

(www.co.st-clair.il.us), at the IGD office and at possible advertised locations at least 15 days (may vary based on waivers granted by HUD) prior to its submission to HUD (by December 14).

In preparing its annual performance report the County considers any comments or views of citizens received by e-mail, in writing, or orally at the public hearings, and a summary of these comments or views is attached to the performance report.

Public Hearings

St. Clair County holds public hearings in person or virtually at various stages of the Consolidated Plan process, including at least one hearing about community needs, hearings to review proposed available funding amounts (including grant and program income amounts) and proposed uses of funds, and hearings to allow the public to assess how funds were spent during the previous program year.

St. Clair County gives notice to the public at least 15 days (may vary based on waivers granted by HUD) in advance of any public hearing or review and comment period provided for this Citizen Participation Plan. Specific time periods for citizen notice and comment for certain actions are explained in other sections of this Plan that describe those actions. The content of these notices gives citizens sufficient information about the subject of the hearing to permit informed comment.

Hearings to secure public comment on current year performance as reported in the CAPER are combined with the Annual Plan/Consolidated Plan hearings. These hearings are provided approximately half-way (March –April) and three-quarters of the way (June-July) through the Program Year. By conducting CAPER hearings with the Consolidated Plan hearings, citizens have the advantage of commenting on the performance of recent programs and activities while they are reviewing and commenting on planned activities.

Public hearings are held at various times of day to allow for the greatest convenience to potential or actual beneficiaries. In person hearings are held in communities where CDBG and HOME-funded activities are being carried out or where there are plans to undertake CDBG or HOME-funded activities. In person public hearings are held at locations that are accessible to people with disabilities and comply with the Americans with Disabilities Act (ADA). Specific accommodations will be made for people with disabilities when requests are made at least five working days prior to a public hearing. Translation for persons with hearing impairments will be provided when requests are made at least five working days prior to a public hearing.

In the case of in person public hearings where a significant number of non-English speaking residents can reasonably be expected to participate, the County will provide translation services for the expected language.

All virtual public hearings will be thru a social media format (facebook, zoom, etc.) and shall provide translation services, if requested.

Meetings

Public Notices are published in at least one newspaper of general circulation in St. Clair County.

Notices can be sent to neighborhood organizations, public housing resident groups, and religious organizations in low-moderate income neighborhoods and to agencies providing services to lower income persons upon request.

All public meetings are held at times and places for in person hearings convenient to people that might benefit from the use of funds. The times and places of meetings to review the County's needs assessment, the preliminary Annual Plan, preliminary Five-Year Consolidated Plan and CAPER may vary from year to year in order to attempt to provide information to, and an opportunity to be heard by, a demographically diverse population.

Availability to the Public

Copies of the Consolidated Plan as adopted, Substantial Amendments, and the CAPER (the annual performance report) are available to the public on the County website (www.co.st-clair.il.us) and at the offices of the St. Clair County Intergovernmental Grants Department (IGD) at cost within a reasonable time after a request is made. These materials can be made available in a form that is accessible to persons with disabilities when requested by coordinating with agencies working with disabled people, such as LINC (Living Independently Now Center), to provide planning and reporting information in an appropriate format.

Access to Records

Citizens, public agencies and other interested parties are given reasonable and timely access to information and records relating to the Consolidated Plan and the actual use of funds covered by the Citizen Participation Plan at the offices of the St. Clair County IGD. Access to records for the past use of funds is limited to uses of funds during the past five years.

Technical Assistance

The staff of the St. Clair County IGD will work with municipalities, townships, organizations and individuals who represent low and moderate-income people who are interested in submitting proposals to obtain funding for eligible activities. All potential funding applicants are encouraged to contact County staff for technical assistance before completing a proposal form.

Complaints and Grievances

Citizen complaints related to the Consolidated Plan, any amendments to the Plan, and the Consolidated Annual Performance Evaluation Report (CAPER) should direct comments by e-mail, in writing, or by phone to:

Rick Stubblefield, Executive Director
St. Clair County Intergovernmental Grants Department
19 Public Square, Suite 200
Belleville, IL 62220
(618) 277-6790 x3203
rstubblefield@co.st-clair.il.us

St. Clair County will provide timely written responses to all written complaints and grievances within 15 working days of the receipt of the complaint, where practicable.

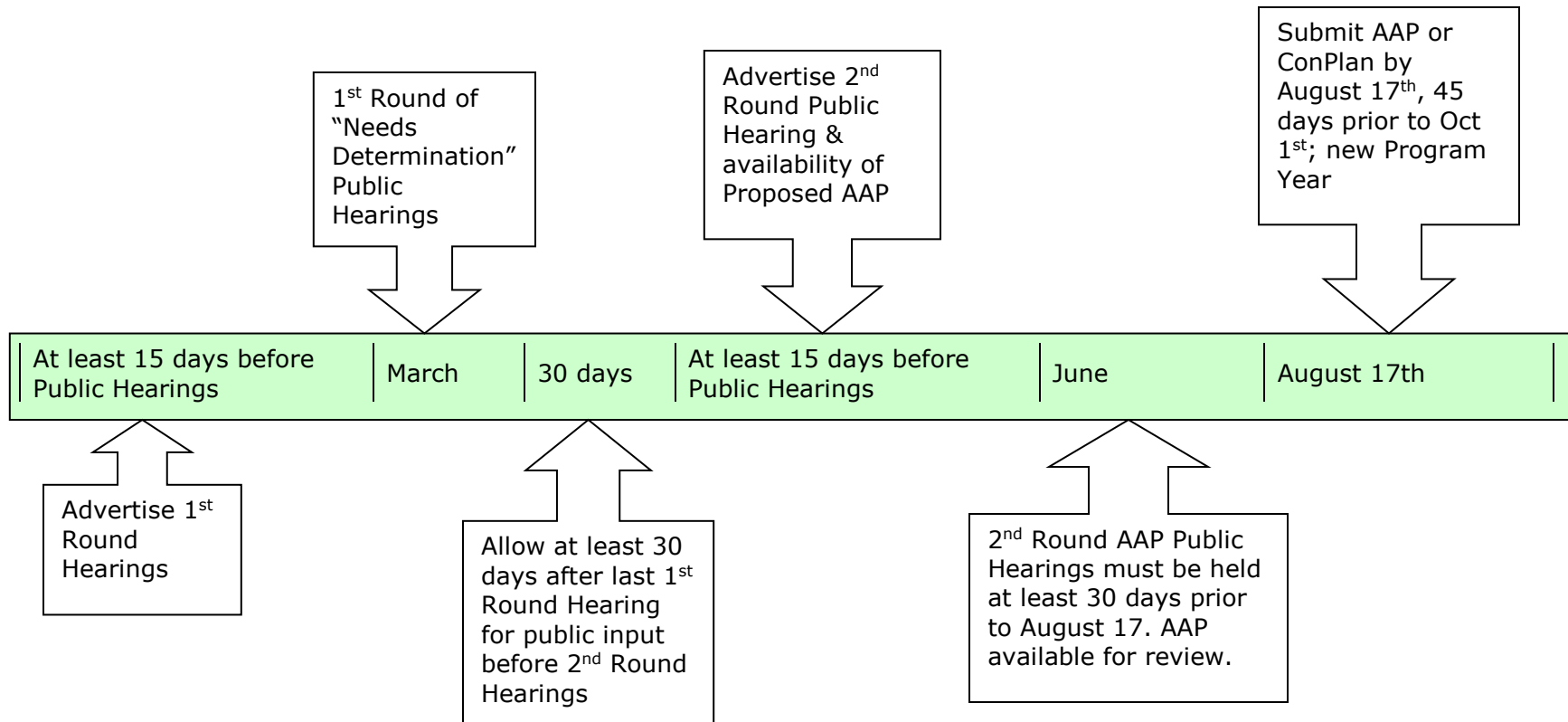
Amendments to the Consolidated Plan

St. Clair County will amend its Annual Plan any time there is (1) a change (addition or deletion) in one of the priorities listed in the Priority Tables of the Five-Year Consolidated Plan; (2) a substantial change in the use of funds to an activity not mentioned in the Annual Plan or Five-Year Consolidated Plan; or (3) a substantial change in the purpose, location, scope, or beneficiaries of an activity in the Annual Plan or Five-Year Consolidated Plan.

Criteria for Substantial Amendments to the Consolidated Plan

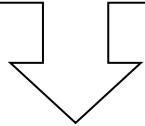
A Substantial Amendment is defined as a change in the use of CDBG or HOME funds from one eligible activity to another, if the change involves an amount greater than twenty percent of the total County CDBG and HOME Investment Partnership grants for the year in which the change is being made, if there is a meaningful change in the geographic location, or if the change in location would result in a substantial decrease in the number of low or moderate-income persons benefiting from the activity.

Annual Action Plan Timeline

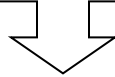


CAPER Timeline

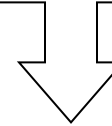
Include CAPER questions at AAP 1st Round of "Needs Determination" Public Hearings



Advertise dedicated CAPER Public



Distribute and advertise CAPER 15 days before submitting to HUD



Submit CAPER by December 29th, 90 days after end of Program Year.

