CITY OF AKRON

CITIZEN PARTICIPATION PLAN

August, 2020

Daniel Horrigan, Mayor
City of Akron, Ohio
CITIZEN PARTICIPATION PLAN

INTRODUCTION

The City of Akron (Akron) is required by the U.S. Department of Housing and Urban Development (HUD), pursuant to 24 CFR §91.105, to have a detailed Citizen Participation Plan (CPP) which contains the City’s policies and procedures for public involvement in the five-year Consolidated Plan and Annual Action Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant Program (ESGP) funds. This CPP is available to the public.

OVERVIEW OF ANNUAL ACTION/CONSOLIDATED PLAN PROCESS

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

- Identification of housing and community development needs;
- Preparation of the draft use of funds for the upcoming year, known as the proposed “Annual Action Plan;” or the development of the new five-year proposed plan known as the “Consolidated Plan;”
- Formal approval by City Council of final Annual Action Plans and/or final five-year Consolidated Plan;
- Occasional necessary change to the use of budgeted funds in an Annual Action Plan; or change to the priorities established in the five-year Consolidated Plan;
- Annual Performance Report to HUD at program year completion drafted for public review and comment.

ENCOURAGING PUBLIC PARTICIPATION

This CPP provides for and encourages public participation, emphasizing involvement by low- and moderate-income neighborhoods, residents of public and assisted housing, and by other low-income residents of neighborhood strategy areas in which public and assisted housing is located. Akron will take appropriate actions as are necessary to encourage participation of minorities, people who do not speak English, and people with disabilities.

Additionally, Akron will encourage the participation of local organizations (including businesses, non-profit and/or faith-based organizations, and those specifically providing broadband internet service and/or those engaged in addressing the issue of “digital divide”) in the development and implementation of the plans described in this CPP by directly engaging said local organizations through dialog and/or direct written notice. Akron recognizes that valuable information is gathered by and communicated through representatives of the community, including recipients and providers of services. Thus, public meeting(s)/hearing(s) to determine the specific needs and
priorities identified by low- and moderate-income people are held in location(s) outside of City Hall. Needs identified during these meetings/hearings will be considered by Akron and addressed in the final proposed plans, as described further herein.

DEPARTMENT OF PLANNING AND URBAN DEVELOPMENT (OFFICE OF INTEGRATED DEVELOPMENT)

The Department of Planning and Urban Development, in the Office of Integrated Development (Planning), houses the Akron staff responsible for planning, implementing, and assessing the federal grant dollars received by Akron from HUD. To this end, Planning ensures that the federal budget is included in Akron’s general budget process. Planning advises the City Administration and Akron City Council on matters related to federal grant programs and provides technical assistance and informational support to all other components of the citizen participation structures, including groups representative of persons of low- and moderate-income. Planning acts as a solicitor of citizen input and is responsible for ensuring compliance with the rules and regulations governing the federal grant programs administered on behalf of Akron.

THE ROLE OF CITIZENS

The primary purpose of the programs covered by this CPP is to improve Akron communities by providing decent housing, a suitable living environment, and growing economic opportunities. All activities are principally for low- and moderate-income individuals.

Because the amount of federal CDBG, HOME, and ESGP funds that Akron receives each year is primarily based upon the severity of both poverty and substandard housing conditions in Akron, it is necessary that public participation involves low- and moderate-income residents who experience these conditions. Involvement by low-income people, particularly residents of predominately low- and moderate-income neighborhoods, takes place at all stages of the process, including identifying and prioritizing needs as well as suggesting the types of programs needed to meet high priorities. A neighborhood is defined as a “predominately low- and moderate-income neighborhood” when, at a minimum, 51% of the residents of the neighborhood have incomes that do not exceed 80% of the area median income as provided by the federal government.

ACCESS TO MEETINGS

Public hearings will be held to address housing needs, the Consolidated Plan, the Annual Action Plan, and any substantial amendments to plans. As described in greater detail below, at least two (2) public hearings will be held annually at varying stages throughout the program year. Notice of hearings will be advertised in the Akron Beacon Journal newspaper (or its electronic media equivalent) and letters of invitation to the hearings will be directly sent to interested citizens, specific organizations, and the
media. Akron social media accounts including, but not necessarily limited to, Facebook and Twitter, will be utilized in promoting hearings/meetings.

Pursuant to applicable sections and regulations associated with the Rehabilitation Act of 1973 and the Americans with Disabilities Act, and unless otherwise specified in the notice, public hearings will be held at Akron City Hall, which is conveniently located in the heart of downtown at 166 S. High Street, Akron, Ohio 44308. Individuals requiring special accommodations should contact Akron’s Department of Human Resources, as described below, in advance of any hearing.

In the event that public hearings cannot be held in-person, Akron may conduct hearings virtually, and will make all materials available for viewing online via Akron’s web site, Facebook, and Twitter. A public comment period will be included with the materials.

Akron is committed to ensuring that individuals with disabilities are able to fully participate in public programs, services, and activities. Anyone who is in need of an accommodation from any Akron department is invited to contact the City of Akron Department of Human Resources, 166 S. High Street, Room 103, Akron, Ohio 44308, (voice) 330-375-2780 as soon as possible. If you require TDD phone service call Ohio Relay at 800-750-0750 and they will assist in contacting the Department of Human Resources at (330) 375-2780.

ACCESS TO INFORMATION

Public and non-profit housing agencies, residents of low- and moderate-income neighborhoods, social service agencies and other interested community groups, including those most affected (and those interested in minimizing displacement or assisting those displaced) will be notified of the availability of copies of draft Consolidated Plans and Annual Action Plans for review, and may submit comments regarding the same. Additionally, copies of Consolidated Plan documents (including this CPP) will be made available upon request by contacting Planning at the following address or website:

City of Akron
Department of Planning and Urban Development
166 S. High Street, Suite 400
Akron, Ohio 44308
Tel: 330-375-2090
Fax: 330-375-2649
Email: planning@akronohio.gov
Website: www.akronohio.gov/planning

Akron will maintain information and records related to its Consolidated Plan and Annual Action Plan (and the use of assistance under said plans) for a period of not less than five (5) years. Akron will make this information available to interested parties upon request.
DISPLACEMENT

The City’s policy is to administer the CDBG program without displacement of households. In the event displacement is unavoidable, the City and/or other responsible party(s) will comply with the regulations of the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, and Section 104(d) of the Housing and Community Development Act of 1974, as amended. Consistent with the goals and objectives of activities assisted under the Act, the City of Akron will take appropriate steps to minimize the direct and indirect displacement of persons from their homes.

TECHNICAL ASSISTANCE

Akron will provide technical assistance to citizen organizations and neighborhood groups representing persons of low- and moderate-income that request assistance in commenting on or developing proposals for funding under programs covered by the plans. This assistance does not include funding, but will include copies of the Consolidated Plan regulations, maps, selected census data, and technical briefings as may be necessary. If requested and necessary, Akron will translate the Consolidated Plan into relevant foreign languages.

PUBLICATION & COMMENT PERIOD

Any proposed Consolidated Plan, Annual Action Plan, and any substantial amendments to either will be published in order to allow interested parties a reasonable opportunity to inspect and submit comments. Akron will publish by: (i) placing a summary of the content/purpose of the plan/substantial amendment in the Akron Beacon Journal (or its electronic media equivalent); (ii) making copies of the plan/substantial amendment available on Akron’s website; (iii) if feasible, providing for in-person inspection of the plan/substantial amendment at Planning’s offices during regular business hours; and (iv) providing a reasonable number plans/substantial amendments, free of charge, to those requesting physical copies of the same.

Upon publication of any proposed Consolidated Plan, Annual Action Plan, and/or any substantial amendment to either, Akron will provide a period of thirty (30) days for the public to review and comment on the same. Akron will consider any comments or views of citizens in preparing final plans/substantial amendments. A summary of the comments/views initiated through the “needs” meeting/hearing (described below), public hearings, or through publication of proposed plans/substantial amendments received by Akron, but not accepted as part of the Plan, will be attached to the final submission of the plan/substantial amendment at issue.

As described in more detail below, if substantial changes arise with regard to the amount or use of funds described in the Consolidated Plan or the Annual Action Plan, citizens will be afforded reasonable notice and opportunity to comment on any such proposed changes.
PUBLIC HEARINGS

With respect to the creation and implementation of the Consolidated Plan, the Annual Action Plan, and any substantial amendments to either, Akron will hold at least two (2) public hearings. Notice of hearings will be advertised in the Akron Beacon Journal newspaper (or its electronic media equivalent) at least seven (7) days prior to the scheduled hearing. If feasible, these hearings will be held in-person at Akron City Hall, and may be conducted before Akron City Planning Commission, Akron City Council, or another Akron board/commission, as determined by Planning.

The timing of these public hearings will be responsive to those people benefitting from program funds, accessible to people with disabilities, and publicized in the Akron Beacon Journal (or its electronic media equivalent), as well as Akron’s social media accounts. At least one public hearing/meeting will be held before the Consolidated Plan or Annual Action Plan is published for comment.

Akron will make every reasonable effort to provide for and accommodate the needs of disabled individuals for all public hearings. Upon request, Akron will provide interpreters and/or prepare appropriate written materials for public hearings at which non-English speaking persons intend to appear or otherwise participate.

Akron will host a public Consolidated Plan "needs" meeting to obtain views of citizens, public agencies and other interested parties regarding housing and community development needs and a review of program performance. Public meetings/hearings about needs will be completed before a draft of the Consolidated Plan is published for comment. Akron may also hold other meetings to respond to proposals and comments at all stages of the Consolidated Plan submission process.

If the need for a plan or CPP amendment arises due to a disaster, or a state of emergency (described further herein), the public hearing requirements described herein may be altered in accordance with applicable law or HUD guidance.

SUMMARY OF IMPLEMENTATION PROCESS (CONSOLIDATED PLAN, ANNUAL ACTION PLAN, AND SUBSTANTIAL AMENDMENTS)

The following is a summary of the citizen participation process that will be followed in implementing Consolidated Plans, Annual Action Plans, and substantial amendments to either:

1. Within a reasonable time of its receipt, Akron will publicly make available HUD-provided-data upon which Akron has based its proposed plans by cross-referencing and providing links to HUD’s website, www.hud.gov. Akron will publish these links on its own website. Akron will further provide the public with an estimate of the amount of CDBG, HOME, and ESG funds it expects to receive in the upcoming year along with a description of the range of types of activities that can be funded with these resources. The public will also be given an
estimate, by type of activity, of the amount of funds that will benefit low- and moderate-income people.

2. After creation of a proposed plan, Akron will issue notices that will advertise a thirty (30) day public comment period for the draft plans. These notices will be published in the Akron Beacon Journal. Notice of public hearings on proposed plans will also be published in the Akron Beacon Journal at least seven (7) days prior to meetings. Notice for these public hearings will also be made available directly to news media, and via Akron social media accounts. Targeted written invitations to these public hearings will be sent to key community groups and organizations.

3. Copies of plan documents will be available for public review and comment for thirty (30) days upon publication. Copies of these documents will also be available through Planning or Akron’s website at www.akronohio.gov/planning. Courtesy hard copies of plans will be provided to community organizations, social service agencies, and neighborhood groups upon request.

4. There will be at least two (2) public hearings held at various stages throughout the planning and implementation phases of any proposed plans. These hearings may be conducted before any Akron body/board/commission, but will typically take place before Akron City Planning Commission and Akron City Council. Further public meetings/hearings may also be held in neighborhoods targeted for assistance. During the planning phase of the Consolidated Plan, a public “needs” meeting utilizing citizens, public agencies, and other interested parties will be held in order to better identify housing and community development needs. Akron will attempt to acknowledge and respond to comments to proposed plans within a reasonable period of time – typically within two (2) weeks.

AMENDMENTS (CONSOLIDATED PLAN & ANNUAL ACTION PLAN)

**Generally**

When changes are needed to an already-approved Consolidated Plan or Annual Action Plan, Akron may determine it necessary to amend said plans. If an amendment is needed, it will either be deemed “substantial” or “non-substantial.” If an amendment is deemed substantial all of the publication, notice, and hearing requirements outlined above with respect to final approval of a Consolidated Plan or Annual Action Plan are applicable to that amendment, and must be followed. Conversely, if an amendment is deemed non-substantial, then a more expedited procedure may be followed in order to quickly and efficiently implement that amendment.

Regardless of whether an amendment is deemed substantial or non-substantial, at a minimum, Akron will notify the public through the Akron Beacon Journal (or
its electronic media equivalent) that a plan has been changed and Akron will notify HUD of the proposed amendment.

**Substantial Amendments**

Substantial amendments to a plan generally include changes to the purpose, scope, location, or beneficiaries of an activity. The following are deemed substantial amendments to a Consolidated Plan and/or an Annual Action Plan:

(i) a change in purpose;

(ii) additional activities involving 50% or more of the federal entitlement;

(iii) additional activities not described in the Consolidated Plan;

(iv) availability of additional federal funds;

(v) carrying out an activity using funds from any program covered by the Consolidated Plan not previously described in the Annual Action Plan; or

(vi) any change that HUD explicitly determines to be substantial.

When there is a proposed substantial amendment to a plan, all of the above citizen participation procedures pertaining to Consolidated Plans or Annual Action Plans will be followed. After compliance with these procedures, Akron will then submit the proposed amendment to HUD for final approval.

**Non-substantial Amendments**

Non-substantial amendments to a plan generally include small changes like the correction of small typographical errors, or the update of contact information and website URLs. The following are deemed non-substantial amendments to a Consolidated Plan and/or an Annual Action Plan:

(i) any proposed change/amendment to the approved Consolidated Plan that does not meet the above definition of a substantial amendment/change; or

(ii) any change that comes about as a result of a natural or man-made disaster, and/or as result of a state of emergency declared by one or more of Akron’s Mayor, the Governor of Ohio, or the President of the United States.

When there is a proposed non-substantial amendment to a plan, the above citizen participation procedures pertaining to Consolidated Plans or Annual Action Plans will not be followed. Although Akron will use reasonable efforts to
place the public on notice of a non-substantial amendment, the typical 30-day comment period will not apply and the public hearing requirements will be waived. Akron will submit all proposed non-substantial amendments to HUD for final approval.

AMENDMENTS (CITIZEN PARTICPATION PLAN)

Similar to the concepts of “substantial” or “non-substantial” amendments to a Consolidated Plan or an Annual Action Plan, if an amendment is needed to change this CPP, it will either be deemed substantial or non-substantial. For purposes of this section, non-substantial amendments to the CPP are: (i) typographical errors; (ii) updated contact information; and (iii) minor or non-substantive changes intended to clarify the substance of the existing CPP. All other proposed changes to the CPP are deemed to be substantial.

Unless there is a disaster or a declared state of emergency, as further described in this section, all of the requirements outlined above with respect to final approval of a Consolidated Plan or Annual Action Plan are applicable to substantial amendments to this CPP. In the event of a of a natural or man-made disaster, and/or a declared state of emergency by one or more of Akron’s Mayor, the Governor of Ohio, or the President of the United States, this CPP may be amended without complying with typical citizen participation procedures applicable to Consolidated Plans and/or an Annual Action Plans.

COMPLAINT PROCEDURE

All complaints related to any plan, substantial amendment, or performance reports should be delivered, mailed, or emailed to Planning at 166 S. High St., Suite 400, Akron, Ohio 44308 - www.akronohio.gov/planning. All complaints will be given consideration and, where practicable, written complaints will be answered in writing within fifteen (15) business days of receipt by Planning.

COMMUNITY INVOLVEMENT

Akron will continue to be involved in coordinating participation among low- and moderate-income residents, public and non-profit housing providers, and private and public health and social service agencies. The following is a summary of recent and/or ongoing community involvement activities.

Akron Metropolitan Housing Authority

Akron holds quarterly meetings with the Akron Metropolitan Housing Authority (AMHA) to discuss issues of mutual concern and to update progress on housing programs or new developments.
**Housing for the Homeless**

The Continuum of Care meets to review issues relating to homelessness. Further, this task force will be consulted in preparing a homeless plan for Continuum of Care. Akron has a Request for Proposal process in place for the Emergency Solutions Grant Program. Emergency shelter agencies are encouraged to submit proposals. Akron meets with agencies to discuss the application process and describe the City’s funding goals as stated in the application. Agencies are given thirty (30) days to submit an application and the Akron strives to review within a forty-five (45) day period.

**Planning Commission and City Council Meetings**

Planning Commission and City Council provide public forums for citizens, citizens’ committees, public agencies, and other interested parties to comment on program elements and proposed use of funds of long-range housing strategies (i.e., CHAS, Consolidated Plan), renewal plans and other planning documents.

**THE “FINAL” ANNUAL ACTION PLAN AND/OR FIVE-YEAR CONSOLIDATED PLAN**

A limited number of copies of the final Annual Action Plan will be made available to the public within three working days of request. In addition, copies will be available at the locations specified above or on the web at [www.akronohio.gov/planning](http://www.akronohio.gov/planning).