



CITIZEN PARTICIPATION PLAN

CLARK COUNTY

COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME INVESTMENT PARTNERSHIP PROGRAM

I. Overview

Clark County receives federal Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME) grant funds annually. Each grant has different regulations, program requirements, and target populations. The two grants are awarded based on a formula that takes into account the population, the demographics of persons living in poverty, the level of overcrowded housing, and the number of rental units occupied by households with low-incomes that were built before 1950.

The Five-Year Housing and Consolidated Community Development Plan is intended to establish a unified vision of housing and community development strategies for the two federal grants received by the County. The plan is also designed to assist the community in meeting the goals intended by Congress to provide decent housing, a suitable living environment, and expand economic opportunities for low-income or disabled persons.

2. Citizen Participation

The County shall follow a citizen participation plan that addresses the following issues: participation, access to meetings, access to information, access to records, publishing the plan, public hearings, notice of hearings, public comments, technical assistance, complaints, and amendments.

a) Encouragement of Citizen Participation in CDBG/HOME Planning and Activities: All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the:

- Five-Year Consolidated Plan;
- Annual One-Year Action Plan;
- Substantial Amendments to the One-Year Action Plan or Five-Year Plan;
- the Citizen Participation Plan; and
- Consolidated Annual Performance and Evaluation Report (CAPER)

All meetings are open to the public and are scheduled at times and locations convenient to potential and actual beneficiaries with accommodations for persons with disabilities and with assistance for non-English speaking persons available as needed. Those wishing to be regularly informed of meetings/activities can be added to the program mailing and e-mail lists.

b) Public Review/Comment on the Adoption of, or Amendments to, the Citizen Participation Plan:

- **Public Notice Requirement and Comment Period:** A public hearing for the adoption of, or amendments to, the Citizen Participation Plan is advertised in The Columbian at least 15 days before the date of the hearing. The public hearing notice shall include a summary of the contents and purpose of the Citizen Participation Plan, and shall include a list of the locations where copies of the entire proposed plan may be examined.
- **Public Review:** During the 15-day public comment period, copies of the proposed Citizen Participation Plan will be made available for public review at the Clark County CDBG/HOME Program Office and at all public library branches in Clark County. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities.
- **Public Comments:** The public may comment on the proposed Citizen Participation Plan in writing or at the public hearing. Written comments must be directed to the CDBG/HOME Program Manager, Clark County CDBG Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98666-5000. Clark County shall consider any comments or views received in preparing the Citizen Participation Plan.
- **Public Hearing Location:** The public hearing shall be held in the Clark County Commissioners Hearing Room, Sixth Floor, Public Service Center, 1300 Franklin, in Vancouver, WA.

c) Final Policy/Implementational Authority: The plan recognizes that as the elected governing body of Clark County, the Board of County Commissioners has the ultimate responsibility and authority for the implementation of the Consolidated Plan and CDBG and HOME activities.

3. Public Meeting Notice and the Corresponding Public Comment Period Requirements:

Notices of public meetings, public hearings, substantial amendments, notifications of 15 or 30-day comment periods, and the notification of Clark County's proposed and actual use of CDBG/HOME funds will be published in The Columbian.

To further encourage the attendance and participation of persons of low- and moderate-income, notices will also be sent to:

- the Vancouver Housing Authority;
- the Clark County Community Action Program;
- public and private agencies that provide housing, health, and social services including those that provide services to children, elderly, disabled, HIV/AIDS, and the homeless;
- public and private agencies that represent people of color residing in Clark County;
- organizations representing non-English speaking citizens in Clark County; and
- other interested parties on the Clark County HOME/CDBG mailing list.

4. Access to Records

Clark County shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the County's use of assistance under the CDBG and HOME Programs during the preceding five years.

Copies of the adopted consolidated plan, adopted substantial amendments, and adopted performance reports, as well as information regarding use of funds and other program information will be maintained by the County's CDBG and HOME program staff.

The public may access these materials by contacting the Program Manager, Clark County CDBG Program, Department of Community Services, PO Box 5000, Vancouver, WA 98666, voice (360) 397-2130, Relay 711 or (800) 833-6388, 8:00 a.m. to 5:00 p.m., Monday through Friday. Reasonable accommodation for persons with disabilities will be made upon request. The CDBG and HOME Program web page address is: www.clark.wa.gov/cdbg/

5. Development of the Annual Action Plan (and/or Five Year Consolidated Plan)

a) Notice of Availability of CDBG and HOME funds: Early in October, Clark County publishes a Notice of Availability of CDBG and HOME funds. Through this notice, Clark County will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance Clark County 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 persons of low- and moderate-income. The Notice also informs the public of the time and place of the CDBG and HOME workshop described more fully in Section 6 of this Plan.

b) Annual Action Plan (and/or Five Year Consolidated Plan) - Public Hearing and Comment Period: Clark County shall provide for a public review process that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine the proposed Action/Consolidated Plan and to submit comments upon the proposed Action/Consolidated Plan.

- **Public Notice Requirement and Comment Period:** The public hearing is advertised in The Columbian at least 30 days before the date of the hearing. The public hearing notice shall include a summary of the contents and purpose of the Action/Consolidated Plan, and shall include a list of the locations where copies of the entire proposed plan may be examined.
- **Public Review:** During the 30-day public comment period (which shall begin during the first or second week of April), copies of the proposed Action/Consolidated Plan will be made available for public review at the Clark County CDBG/HOME Program Office and at all public library branches in Clark County. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. Clark County shall provide a reasonable number of free copies of the Action/Consolidated Plan to citizens and groups upon request. This document will also be made available on the Clark County CDBG website at www.clark.wa.gov/cdbg/documents
- **Public Comments:** The public may comment on the Action/Consolidated Plan in writing or at the public hearing. Written comments must be directed to the CDBG/HOME Program Manager, Clark County CDBG Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98666. Clark County shall consider any comments or views received in preparing the Action/Consolidated Plan. A summary of all comments or views, and a

summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Action/Consolidated plan.

- **Public Hearing Location:** The public hearing, which shall be scheduled for the first or second week of May, shall be held in the Clark County Commissioners Hearing Room, Sixth floor, Public Service Center, 1300 Franklin, in Vancouver, WA.

6. Competitive Fund Allocation Process

Clark County receives annual allocations of CDBG and HOME funds. After funding awards are made, any funds returned from projects, either completed under budget or cancelled, are used for projects not awarded their full request due to lack of funds. If additional funds remain, they are reallocated in the next program year funding cycle.

The County utilizes separate competitive fund allocation processes to recommend HOME and CDBG projects for funding to the Board of County Commissioners. The public is notified about the availability of the funding applications by newspaper advertising and direct mailings to cities, nonprofits, and past recipients. The process also includes an application workshop and technical assistance.

- a) **CDBG and HOME Funding Workshops:** Early in October, Clark County publishes a Notice of Availability of CDBG and HOME funds. The notice informs the public of the estimated amount of CDBG and HOME funds available for the following program year (including grant funds and program income). The notice also informs the public of the time and place of the CDBG and HOME application workshop. Workshops are conducted to assist applicants who may apply to Clark County for CDBG or HOME funds. At the workshops, program objectives, eligible activities, eligible applicants, funding policies, application forms and the proposal evaluation and selection process are discussed. Department staff will also meet with applicants individually (upon request), to discuss proposal development and to provide assistance. Each workshop participant receives a copy of the annual Request for Proposals, Proposal Forms and Instructions, and the County's CDBG and HOME Funding Policies. The locations of the workshops are handicapped accessible.
- b) **City Community Development Meetings:** Each city, before it may submit its CDBG and/or HOME application, must hold a public meeting to inform the residents about program objectives, eligible activities, and to solicit public comment on local needs. Proposed projects must be consistent with the Consolidated Plan and local plans and community strategies. Nonprofit agencies proposing projects in specific cities must provide information about their project to the city at a regularly scheduled city meeting before their application is submitted to the county. Each city or town must document their citizen involvement processes and provide the documentation with their funding application.
- c) **Project Selection:** The Urban County Policy Board (UCPB) selects CDBG and HOME projects based on a numerical scoring system. The UCPB consists of the mayors of all cities and towns in the county, except the City of Vancouver, or their designee and is chaired by a county commissioner. The projects selected are recommended to the Board of County Commissioners for final approval and submission to HUD. UCPB meetings are regularly scheduled for the second Friday of the month in the Center for Community Health located at 1601 E. Fourth Plain Boulevard, Vancouver, WA. The meeting is scheduled from 8:30 to 10:30 a.m.

7. Program Performance Review

A public hearing is held in late September by the Board of County Commissioners to gather public input on the County's performance during the last program year. The Consolidated Annual Performance Evaluation Report (CAPER) analyzes progress towards the goals established in previous plans with regard to the unit of measure for the project, as well as timely completion. This report also provides information on the performance of funded projects in relationship to the program objectives.

- a) Public Notice Requirement and Comment Period: The public hearing is advertised in The Columbian at least 15 days before the date of the hearing.
- b) Public Review: During the 15 day public comment period, copies of the CAPER will be made available for public review at the Clark County CDBG/HOME Program Office and at all public library branches in Clark County. Reasonable accommodations will be made for non-English speakers and for people with disabilities. The CAPER will also be posted on the Clark County CDBG website at www.clark.wa.gov/cdbg/documents
- c) Public Comments: The public may comment on the CAPER in writing or at the public hearing. Written comments must be directed to the CDBG/HOME Program Manager, Clark County CDBG Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98666. Clark County shall consider any comments or views received in preparing the Consolidated Plan. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final CAPER.
- d) Public Hearing Location: The public hearing shall be held in the Clark County Commissioners Hearing Room, Sixth Floor, Public Service Center, 1300 Franklin, in Vancouver, WA.

8. Non-English Speaking and Handicapped Residents

Public Hearing/Meeting Accommodation

All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the County will provide translators at public hearings and meetings. Furthermore, meeting notices will be sent to organizations representing non-English speaking residents of Clark County.

CDBG/HOME Document and Materials Review Accommodations

Reasonable accommodations will be provided to disabled persons, or non-English speaking persons needing assistance in reviewing CDBG/HOME program materials or documents.



For other formats, contact the Clark County ADA Office: **Voice** (360) 397-2000; **Relay 711** or (800) 833-6388; **Fax** (360) 397-6165; **E-mail** ADA@clark.wa.gov.

9. Technical Assistance

The Clark County Department of Community Services will provide technical assistance to groups that request such assistance to develop an application to the County or HUD. Such technical assistance may include an explanation of:

- a) Program rules and regulations;
- b) Requirements for implementing and managing projects;
- c) Project eligibility and national objectives requirements; and
- d) The evaluation process used by the Urban County Policy Board in recommending projects to the County Board of Commissioners.

The County's provision of technical assistance does not include the preparation of grant applications for individuals or organizations. The County's provision of technical assistance is limited by funds and staff availability.

10. Procedures for Complaints or Grievances

Complaints, inquiries, and grievances shall be submitted in writing to the Program Manager, Clark County CDBG/HOME Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98668-5000. A written response shall be provided to the complaining or aggrieved party within 15 working days of the date of receipt of the written complaint or grievance.

11. Program Year Schedule

July	Start of program year
September	Public Hearing regarding the performance of the previous year's activities– CAPER (15-day comment period prior to hearing)
October	Notice of Availability of CDBG/HOME Funds Published Applications available for next funding round of CDBG and HOME funds Pre-submittal Meeting to answer questions regarding the CDBG and HOME applications
December	CDBG and HOME applications due
March	CDBG and HOME projects selected by UCPB for funding
May	Public Hearing on Action Plan/Consolidated Plan (30-day comment period prior to hearing)

12. Criteria and Procedures for Amendments and Substantial Amendments to Action Plans and/or the Five Year Consolidated Plan

A "substantial amendment" is an amendment to the Consolidated Plan or Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, Clark County will provide citizens with a 30-day notice (advertised in The Columbian and by mailing list) of an opportunity to comment whenever a substantial amendment is being proposed for the Clark County CDBG and HOME programs. Clark County shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted (that is, comments that do not result in changes) shall be included in this summary along with the reason they were not accepted.

A substantial amendment is defined as:

- a) Changes to any of the goals, policies, or procedures identified in the Consolidated Plan.
- b) Changes to the CDBG or HOME budget for a project by an amount in excess of thirty percent;
- c) Changes in the purpose, scope, beneficiaries, or location of the project;
- d) A change in allocation priorities or method of distribution of funds;
- e) A change in the source of funding, from one source to any other source (including program income) covered by the consolidated plan; or
- f) Cancellation of an existing project or adding a new project.

Changes that are not considered substantial amendments:

- a) Changes to the CDBG or HOME budget for a project by an amount that is less than thirty percent;
- b) Consolidated Plan data updates such as census data, income limits, and fair market rents, HOME high and low market rents, HOME subsidy limits, and similar types of data shall not be considered a substantial amendment;
- c) A minor change in location on a specific property is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same; or
- d) The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering) does not constitute a substantial change.

13. Minimizing Displacement

Consistent with the goals and objectives of activities assisted under the Act, the Clark County CDBG and HOME Programs will take the following steps to minimize the displacement of people, businesses, nonprofits, and/or farms:

- a) Discourage projects involving displacement/relocation through a grant application scoring system that reduces the total score of projects that anticipate displacement/relocation;
- b) Encourage project sponsors to plan or stage projects to minimize and/or prevent the adverse impacts of displacement;
- c) Provide for the establishment of temporary relocation facilities in order to provide housing to households whose displacement will be temporary;
- d) Provide advisory services which will include such measures, facilities, and services as may be necessary to determine relocation needs, or other assistance for which displaced persons may be eligible;
- e) Coordinate code enforcement with rehabilitation and housing assistance programs;
- f) Stage the rehabilitation of apartment units to allow tenants to remain in the building/complex during and after rehabilitation by working with empty units or buildings first; and
- g) Replace housing units one for one which meet the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (24 CFR 42.375).

Any residential tenant who will be permanently and involuntarily displaced shall be entitled to the following services and benefits:

- a) **Timely Information.** The tenant will be contacted and provided timely information that fully explains the reason for the displacement and the relocation assistance available;
- b) **Advisory Services.** The tenant will be provided appropriate advisory services necessary to minimize hardships in adjusting to the relocation;
- c) **Advance Notice.** Unless there is an urgent need for the property (e.g., substantial danger to a person's health or safety) or the tenant is evicted for cause, the tenant shall be given at least 90 days' advance notice of the earliest possible date which they must vacate the property;
- d) **Replacement Housing Assistance.** Replacement housing assistance is available to both renters and owners in the form of rental assistance or purchase assistance. The replacement assistance is based on a number of factors as provided in the Uniform Relocation Act and its regulations at 24 CFR Part 24; and,
- e) **Moving Expenses.** The tenant will be reimbursed for reasonable, documented costs of his/her moving and related expenses, or the tenant may elect to receive a fixed payment for moving and related expenses.

October 3, 2002
Adopted by the Board of County Commissioners November 26, 2002
UCPB meeting location change, April 15, 2003
CHRB meeting location change, September 15, 2004
Applications no longer available via website, September 15, 2004
New Department of Community Service location, February 2, 2007
Disbanded HOME Consortium, July, 1, 2009
Updates throughout plan, October 11, 2011