



Community Services Division Office of Community Development

Citizen Participation Guidance

Citizen participation requirements for Ohio's Community Development Block Grant (CDBG) Community Development Program are designed to provide local citizens with an opportunity to participate in the planning, implementation and assessment of the community's CDBG program. Two public hearings are required, the first one at the initial stage of application preparation and the second one after the application is developed but prior to submission to the Office of Community Development through OCEAN.

The purpose of the citizen participation process is to assure that the CDBG program addresses the needs of those whom it is primarily intended to benefit. Failure to seek and consider input is a violation of program regulations and can result in citizen complaints and charges that national program objectives are not being met.

Each grantee must adopt a citizen participation plan, which at a minimum:

- Provides for and encourages citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which section 106 funds are proposed to be used, and in the case of a grantee described in section 106 (a), provides for participation of residents in low and moderate income neighborhoods as defined by the local jurisdiction;
- Provides citizens with reasonable and timely access to local meetings, information and records relating to the grantee's proposed use of funds, as required by regulations, and relating to the actual funds under this title;
- Provides for technical assistance to groups representing persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development programs, including at least the development of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
- Identifies how the needs of non-English speaking residents will be met in the case of public hearing where significant number of non-English speaking residents can be reasonably expected to participate.

If the locality already has a written citizen participation plan, it is recommended that the existing procedure be maintained and updated as needed. Counties with acquired cities must fulfill Citizen Participation requirements on behalf of those jurisdictions.

Under the Community Development Formula Allocation Program, an eligible county or city receives a funding allocation which is distributed to projects within the jurisdictions. The Formula Allocation Program, as part of any application process and grant administration, is required to:

- Formally send written notice of the availability of funds and date of the public hearing to public officials from cities, village and townships within its jurisdictional limits, before submitting a funding application to the state.
- Consider the needs of cities, villages and townships in preparing applications under the program.
- Formally solicit and consider funding requests from cities, village and townships.
- Assume full responsibility for direct administration of the program, and compliance with all applicable Federal and State laws.
- An OCD grantee may not act as a pass-through entity unless specifically designated by OCD. Grant administrators that are not grantee employees have a contractor relationship with OCD grantees.
- Procure contracts necessary for the design, implementation and administration of the program, according to CDBG standards and guidelines, as well as OCD Policy Notice 15-02.
- Retain all program records, according to CDBG and State of Ohio guidelines.

The minimum citizen participation public hearing for the Community Development Program includes:

- Public Hearing #1 must be held prior to the development of the application. Adequate notice of this public hearing must be made 10 days in advance following the guidance provided in OCD Policy Notice 07-01.
- Public Hearing #2 must be held after the application is developed but prior to its submission to the Office of Community Development. Adequate notice of this public hearing must include a summary of the proposed activities to be undertaken and be published 10 days in advance following the guidance provided in OCD Policy Notice 07-01.
- Minutes from both public hearings must be maintained in the grantee's citizen participation file. The minutes must be accompanied by a list of attendees at each hearing.
- Any written citizen comments or complaints provided at the public hearings or during the implementation of the program must be maintained in the grantee's citizen participation file.
- Citizen complaints regarding the planned or actual implementation of the program must be responded to promptly in writing within 15 days. At the time the response is made, a copy of the complaint and the response must be sent to the Office of Community Development.
- Program documents must be made available for public inspection and copying during regular business hours at the offices of the grantee, upon written or oral request. Available documents must, at a minimum, include:
 - Program regulations;
 - Applications;
 - Status reports and performance reports; and
 - Activity guidelines such as housing rehabilitation guidelines
- Bilingual opportunities should be provided where applicable. If the community has a population segment with a primary language other than English, bilingual notices and provision for translations of program documents should be provided.

Since the two public hearings are the primary citizen participation mechanisms required of all applicants, it is important that all of the necessary program information be conveyed at each hearing and the minutes of each hearing, including all citizen comments, be maintained in the appropriate CDBG file.

Information to be conveyed and program areas to be discussed at **Public Hearing #1** includes the following items:

- National and state program objectives;
- Estimated amount of funds available to the community;
- Range of eligible activities;
- Performance of the locality in past CDBG programs, if applicable;
- A summary of other program requirements;
- Date of Public Hearing #2;
- Date Application is due to the Office of Community Development in OCEAN; and
- Citizen views and comments.

Between Public Hearing #1 and Public Hearing #2, the locality may wish to formally solicit block grant proposals from organizations, individuals, other governmental units or other sub-recipients.

Ten (10) or more working days after the first public hearing, Public Hearing #2 is required in order to give citizens an opportunity to review and comment on the community's proposed Application prior to its submission.

The format for Public Hearing #2 must include the following information and areas for discussion:

- A presentation by a representative(s) of the community on the city's or county's proposed CDBG program, including the activity or activities to be undertaken, the amount of CDBG and other funds allocated for each activity, the objective of each activity, the timetable for starting through completion of each activity, and what national objective(s) each activity will meet.
- The grantee should have available for citizens a written summary of the proposed CDBG program. Note: copies of the newspaper notice that advertised the second public hearing, which includes a summary of the community's proposed CDBG program, should provide the necessary information.
- Citizen views and comments.

Citizen participation/public hearing is also part of the program amendment process. If the Office of Community Development determines that a program change constitutes an amendment, one public hearing will be required at that time. The primary purpose of an Amendment Public Hearing is to provide citizens with an opportunity to review and comment on a "substantial change" in a grantee's CDBG program. The format for Amendment Public Hearing should be similar to Public Hearing#2 outlined above.

ML/DG