



CITY OF DETROIT

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Citizen Participation Plan

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91.105 CITIZEN PARTICIPATION PLAN; LOCAL GOVERNMENTS

Addendum – Citizen Participation Plan for the Covid 19 Disaster Declaration Coronavirus Health Crisis of 2020 Pandemic Response (changes in bold and in red here and on page 5) – Updated May 27, 2020

Per federal regulations at 24 CFR 91.105, the City of Detroit must adopt a Citizen Participation Plan (CPP) that sets forth its policies and procedures for citizen participation and gives its citizens “Reasonable Notice and Opportunity to Comment” on the management and use of federal grant funds received from the U.S. Housing and Urban Development (HUD). When a change in federal regulations or programs require changes in the CPP and community input, the CPP may need to be amended, go through a community input process on the amendment, and adopted by the City’s authorizing body.

As a result of the unprecedented Coronavirus health crisis of 2020 and its impact on the U.S. economy, Congress approved the *Coronavirus Aid, Relief and Economic Security Act* (CARES Act) (Public Law 116-136) and made available supplemental Community Development Block Grant (CDBG), Emergency Solution Grant (ESG) and Housing Opportunities for Persons With Aids (HOPWA) funding for grants to prevent, prepare for, and respond to Coronavirus (CV grants). The CARES Act also provides the City with the flexibility to make it easier to use CARES Act grant funds and fiscal years 2019 and 2020 grants for expeditious Coronavirus response by authorizing HUD to grant waivers and alternative requirements for specified periods as noted below.

Due to the need for expediting distribution of new funding under the CARES Act, and national/local recommended social distancing guidelines and stay at home orders, HUD has authorized grantees such as the City of Detroit to amend its CPP to establish expedited procedures and waive in-person public meetings.

The CPP is hereby amended to include the following changes:

- In response to the Covid-19 Disaster Declaration, in a Memorandum issued March 31, 2020, HUD has waived the 30-day minimum for the required public comment period. It now allows for a 5-day comment period on substantial amendments to the Consolidated Plan/Action Plans through the end of the City’s 2020 program year. The

City will shorten its public comment period from 30 to 5 days. If the City wishes to make further amendments to prior plans following the 2020 program year, the City can do so during the development of FY 2021 Annual Action Plan.

- Includes virtual hearings as an allowed citizen participation method for public meetings and focus groups. If virtual hearings are used, real-time responses must be facilitated and accommodations for persons with disabilities and/or with limited English proficiency will be made available to the greatest extent possible with reasonable notice.**
- Updates the types of declared disasters or emergency events to include terrorism and infectious diseases, such as the recent Coronavirus 19 (COVID-19) pandemic, that may necessitate expedited substantial amendments.**
- Includes by reference provisions relative to Consolidated Plan citizen participation, Community Development Block Grant (CDBG), HOME Investment Partnership, Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With Aids (HOPWA) waivers made available under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.**
- Provides details on possible actions, including reprogramming of funding, addition of funding to related activities, changes in scope of activities, and types of possible activities that may be undertaken in response to the declared disasters or emergency events such as COVID-19 pandemic.**
- Makes minor edits that do not change the current intent and policies of the CPP.**

(A) APPLICABILITY AND ADOPTION OF THE CITIZEN PARTICIPATION PLAN AND BACKGROUND

- (1) The jurisdiction is required to adopt a citizen participation plan that sets forth the jurisdiction's policies and procedures for citizen participation. (Where a jurisdiction, before August 17, 2015, adopted a citizen participation plan, it will need to amend the citizen participation plan to comply with provisions of this section.)**
- (2) The Housing and Community Development Act of 1974, as amended, and HUD regulations, require that the City of Detroit adopt a citizen participation plan. The plan**

sets forth the policies and procedures for citizen participation related to the HUD Consolidated Submission for Community Planning and Development Programs.

This citizen participation plan must provide for and encourage citizens to participate in the development of the Consolidated Plan, Annual Action Plan, substantial amendments to the Consolidated Plan/Action Plan, and the CAPER report.

The plan must encourage participation by low and moderate income persons, particularly those living in slums and blighted areas, revitalization strategy areas and in areas where grant funds are proposed to be used, and by residents of predominately low and moderate income neighborhoods.

The plan must encourage participation by all Detroiters, including minorities, non-English speaking persons, and persons with disabilities. The plan must encourage the participation of residents of public and assisted housing developments, along with other low income residents of targeted revitalization areas.

The City must provide citizens with reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the plan.

(B) CITIZEN PARTICIPATION OBJECTIVES

The objectives of the City's Citizen Participation Plan for the Consolidated Plan/Action Plan and related activities are:

- To conduct all aspects of these activities in an open manner, consistent with Federal regulations, State law, and the Detroit City Charter, with freedom of access for all interested persons.
- To assure the involvement of low and moderate income persons, members of minority groups, residents of areas where significant Consolidated Plan activities are proposed or ongoing, the elderly, the handicapped, the business community, and civic groups who are concerned about community development in Detroit.
- To insure continuity of involvement of citizens and/or citizen organizations throughout all stages of these programs.
- To provide adequate and timely information to all interested persons and groups.

- To encourage the submittal of views and proposals regarding the Consolidated Plan and related activities.
- To fulfill the requirements for citizen participation promulgated by the U.S. Department of Housing and Urban Development.
- To provide for and encourage citizens to participate in the Consolidated Plan process including the five-year Consolidated Plan, Annual Action Plan, substantial amendments to these plans, the CAPER report, and the Analysis of Impediments (AI) or Assessments of Fair Housing (AFH).
- To use a comprehensive approach that includes current methods of communication and update the strategies as new technologies are developed.

(C) CITIZEN PARTICIPATION: GENERAL POLICIES AND STRATEGIES

The City of Detroit has established a year-round citizen participation process for the Consolidated Plan and related activities. This process includes the preparation and distribution of informational materials, public meetings and hearings, a citizen proposal system and, in some cases, direct citizen input in project planning and implementation activities.

The City uses the following general policies and strategies to meet its citizen participation responsibilities.

- The City will encourage participation by low- and moderate-income persons, particularly those persons living in areas designated by the jurisdiction as a revitalization area or in a slum and blighted area and in areas where federal grant funds are proposed to be used, and by residents of predominately low- and moderate-income neighborhoods.
- To assure that all aspects of the consolidated planning process are conducted in an open manner with access to all interested persons, the City will conduct open hearings and meetings, publish and/or mail notices and other information as necessary, and maintain copies of documents for public review and inspection during regular business hours. Information will also be available on the City of Detroit website (see contact information).
- To ensure the participation of persons with disabilities by holding public hearings and meetings at locations accessible to such persons, consistent with accessibility and reasonable accommodation requirements, in accordance with section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable.

The City will provide appropriate auxiliary aides and services that are necessary to afford individuals with hearing and vision impairments an equal opportunity to access and participate in such hearings. These may include effective methods that make aurally delivered information available to individuals who are deaf or hard of hearing, and visually delivered materials available to individuals who are blind or have low vision. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. In determining what types of auxiliary aids and services are necessary, a public entity shall give primary consideration to the requests of individuals with disabilities. To be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.

- Because of the small number of non-English speaking residents in the City, few if any non-English speaking residents are expected at public hearings and meetings. However, with reasonable notice, the City will make arrangements so that non-English speaking residents may participate in consolidated plan and related activities depending upon the number of persons involved, such arrangements may include interpreters at public hearing and meetings or at appointments. Such arrangements may also include the preparation of selected materials in a foreign language.
- To ensure continuity of involvement by citizens and citizen organizations, the City will develop an email mailing list of interested persons and organizations and use this mailing list to send information electronically via email blast of notices and consolidated plan related materials.
- To provide adequate and timely information, the City will distribute, using various methods, documents, plans, and other information on the Consolidated Plan as well as maintain documents for citizen inspection.
- Information on the Consolidated Plan will be provided at public meetings and hearings, at meetings with various community organizations, by appointments with individuals, and by telephone.
- To encourage citizen submittal of views and proposals, the City has developed citizen proposal guides and will provide reasonable technical assistance to those wishing to make proposals, and the city will respond to both written and oral complaints.
- The City has and will encourage neighborhood organizations in project areas to participate in the planning and implementation of project activities in an advisory capacity. Such organizations have and will be invited and encouraged to submit project proposals and plans. In some instances, such organizations may be signatories to contracts implementing project activities. In some instances, when an organization is properly structured and

capable, they may actually carry out consolidated plan activities under contract with the City.

- The City has and will receive proposals from community and neighborhood organizations and from individuals during the request for proposal process. The City reviews such proposals and maintains them on file. They will usually be considered for funding for the upcoming program year fund allocations during the preparation of the Consolidated Plan/Action Plan or its annual update. In some instances, proposals will be considered for funding from current year allocations through the plan amendment process.
- Where appropriate, the City has and will confer with and use community based and faith based organizations, community housing development organizations, non-profit public service organizations, regional organizations, the local Continuum of Care, and homeowners' associations in planning and implementing the Consolidated Plan process.
- The City will encourage the participation of residents of public housing and assisted housing developments (including any resident advisory boards, resident councils, and resident management corporations), where applicable, in the development and implementation of the AFH and the Consolidated Plan.
- The City will provide information to the local Public Housing Authority (PHA) about the Consolidated Plan activities related to its development and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

(D) ASSESSMENT OF FAIR HOUSING (AFH)

- (1) To obtain the views of the community on AFH-related data and affirmatively furthering fair housing in the **jurisdiction's** housing and community development programs, the citizen participation plan must provide that at least one public hearing is held before the proposed AFH is published for comment.
- (2) The citizen participation plan must **state** how and when adequate advance notice will be given to citizens of each hearing, with sufficient information published about the subject of the hearing to permit informed comment. (Although HUD does not specify the length of notice required, it would consider two weeks adequate.)
- (3) The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The citizen participation plan must specify how it will meet these requirements.

- (4) The citizen participation plan must identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

(E) CITIZEN PARTICIPATION: SPECIFIC POLICIES PROCEDURES

Informational Materials

The City has and will develop and distribute to citizens, public agencies, and other interested parties' informational materials that explain the consolidated plan, the citizen participation process, the amount of assistance the City expects to receive, the range of activities that may be undertaken, the amount of assistance expected to benefit persons with low and moderate incomes, and related matters.

The City will conduct public hearings and/or meetings to distribute and explain materials regarding the Consolidated Plan/Action Plan, its contents, the process for preparing the plan, etc. The City will also conduct public training meetings for persons and organizations wishing to submit proposals for the use of CDBG and other funding. Materials from the training will be available on the City of Detroit website. The City will duplicate and distributes copies or portions of the Consolidated Plan and related documents. Informational materials will be distributed at public meetings and hearing, by notices in newspapers, uploaded on the City's website and/or by mail.

Anti-Displacement

The City has and will prepare plans to minimize displacement. These plans will specify the types and levels of assistance to persons displaced.

Publication of the Consolidated Plan and Annual Action Plan

The City will publish a summary of the proposed consolidated plan in the newspaper and on the City's website. This summary will describe the contents and purpose of the consolidated plan and will list the locations where copies of the complete proposed plan may be examined. Copies of the complete proposed plan will be available in the offices of the Housing and Revitalization Department and on the City's website. A reasonable number of free copies of the plan will be made available to citizens or groups that request it.

Public Hearings on the Consolidated Plan and Annual Action Plan

A public hearing on the consolidated plan, its contents, and the process for preparing the plan will be held prior to preparation of the proposed plan. A public hearing will also be held after publication of the proposed plan during the required comment period.

Public Comment Period on the Proposed Consolidated Plan and Annual Action Plan

A public review and comment period of at least 30 days duration will be held after publication of the proposed consolidated plan. Citizens will be encouraged to present their comments and opinions on the proposed plan at a public hearing, or by mail, email, telephone, or appointment at the offices of the Housing and Revitalization Department.

Consideration of Public Comments

Comments and opinions on the proposed consolidated plan will be considered by the City when preparing the final consolidated plan. A summary of comments and views received will be attached to the final plan. A summary of the reasons for not accepting opinions or views not included in the plan will also be attached to the final plan. A draft will be available on the City's website. Citizens can provide comments via email displayed on the website.

Substantial Amendments to the Consolidated Plan/Action Plan

The City has established the following criteria for use in determining when a change in the Consolidated Plan/Action Plan constitutes a substantial amendment of the plan. A change will be considered substantial amendment to the plan if it has one or more of the following characteristics:

- It involves a new activity not described in the plan.
- It involves discontinuance of an activity described in the plan prior to completion of the activity.
- For activities such as single family home rehabilitation and public services which involve multiple work units, i.e. houses or persons, an activity will be considered discontinued before completion if over 15% of the funds remain for use and enough funds remain to complete at least one unit.
- It involves a change in the activity or the location of the activity such that there would be a change in the probable beneficiaries of the activity.
- It involves a change in the activity which requires preparation and publication of a revised environmental assessment.
- It involves a change in an activity cost of at least 20% of total allocation.

When a substantial amendment to the consolidated plan/action plan is being considered, a notice will be published in the local newspaper and on the City's website that the City intends to amend the consolidated plan/action plan. This notice will describe the amendment, and indicate how citizens may comment on it. A period of at least 30 days of the posting will be provided for citizens to comment on the amendment before it is implemented.

The City will consider comments and views on proposed substantial amendments. A summary of these comments and views will be attached to the substantial amendment. If comments and views are not accepted, the reasons for not accepting them will be summarized and attached to the substantial amendment.

Performance Reports

A notice will be published in the newspaper and on the website when the consolidated annual performance and evaluation reports (CAPER) are available for public review and comment. This notice will briefly describe the contents of the CAPER report, and indicate how citizens may comment on it. A period of at least 15 days will be provided for citizens to comment on the CAPER report before it is submitted to HUD. Citizens may comment and submit views on the CAPER report by letter, by telephone, and by appointment at the offices of the Housing and Revitalization Department (See note for contact information).

In some instances, a special public hearing on the CAPER report may be conducted by the City to receive citizen comments and views on the CAPER report. In addition, citizens may comment on the CAPER report at public hearings and public meetings held each year by the City prior to preparation of the consolidated plan.

The City will consider comments and views submitted by citizens. It will attach a summary of such comments and views to the CAPER report.

Public Hearings

The City will hold at least two public hearings to obtain citizen views and to respond to proposals and questions on the consolidated plan. These hearings will address housing and community development needs, the development of proposed activities, and the review of program performance. One of these hearings will be held prior to the preparation of the proposed consolidated plan. The other will be held after the preparation and publication of the proposed consolidated plan, but before submittal of the plan to HUD.

Notice of these hearings will be published in the newspaper at least 14 days prior to the hearing. The notice will include sufficient information regarding the subject of the hearing to permit informed comment. The notice will usually indicate that comments and views on the subject may be submitted by letter, telephone, or appointment to the Housing and Revitalization Department (see note for contact information)ⁱ.

In addition to publication in the newspaper, the City will normally mail notices of these hearings to persons and organizations who have indicated an interest in the subject during the prior 12 months. The City will hold these hearings at locations accessible to the handicapped. The City will make arrangements for the participation of persons with special needs and for non-English speaking residents if a significant number of such persons are expected to participate, or if such persons give reasonable notice of their intent to attend.

Whenever possible, press releases regarding these hearings will be prepared by the City's Public Information Department and distributed to newspapers, magazines, social media, television stations, and public service radio and television announcements will be requested. The City of Detroit's website will contain press releases

Meetings

The city will provide citizens with reasonable and timely access to local meetings on consolidated plan related matters. In many cases, public notice of these meetings will be given using the methods described in the above public hearing section.

Availability to the Public

The consolidated plan/annual action plan as adopted, substantial amendments, and CAPER reports will be available to the public in the offices of the Housing and Revitalization Department and on City's website. Upon request and with reasonable notice, the Housing and Revitalization Department will make special efforts to make these records readily available to persons with disabilities. A reasonable number of copies of these documents will be made available to the public without charge upon written request to the Housing and Revitalization Department. However, due to the size of the documents, at some point, it may be necessary to charge for them. Extracts of reasonable size from the document will be made available without charge upon reasonable notice. Citizens can also contact Housing and Revitalization Department to have materials emailed. (See note for contact information).

Access to Records

The City will provide citizens access to information and records related to its consolidated plan and the use of federal assistance in programs related to the consolidated plan. Access to such information and records will normally be provided by appointment with reasonable notice. Appointments should be made through the Housing and Revitalization Department (see note for contact information).

Technical Assistance

The City will provide technical assistance to groups representing persons of low and moderate income and others that request such assistance in developing proposals for funding assistance under any programs covered by the consolidated plan. Technical assistance may be provided at public meetings, by City sponsored training sessions, by proposal forms with instructions, by appointment in the offices of the Housing and Revitalization Department and by telephone. Reasonable notice of the need for such assistance should be given to the Housing and Revitalization Department. In addition, the City has and will prepare and distribute guides to assist citizens in making project proposals.

Complaints

The City will respond to written complaints related to the consolidated plan, substantial amendments, and CAPER report in a timely manner. Such complaints may be made in person at public meetings and hearings, by appointment with reasonable notice, by mail, email and by telephone to the offices of the Housing and Revitalization Department (see note for contact information). Response to written complaints will be made in writing within 15 days, where practical. Persons with complaints will be encouraged to put such complaints in writing with appropriate documentation.

The City also receives oral complaints at public hearings and meetings, and by telephone. When possible, City staff will try to respond orally to such complaints immediately. In some instances, persons making oral complaints will be asked to put the complaint in writing with appropriate documentation. In other instances, the City has and will respond within 15 working days either orally or in writing as appropriate and convenient.

¹ The City Of Detroit, Housing and Revitalization Department may be contacted at the address or telephone number shown:

Housing & Revitalization Department
Coleman A. Young Municipal Center
2 Woodward, Suite 908
Detroit, MI 48226
Telephone: (313) 224-6380
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Contact Us

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