

**Citizen Participation Plan for the  
Community Development Block Grant (CDBG) Program  
Housing Investment Partnerships Act (HOME) Program  
Emergency Solutions Grant (ESG) Program  
Macomb Urban County/Macomb HOME Consortium**

This Citizen Participation Plan (CPP) was written and adopted in conformance with the U.S. Department of Housing and Urban Development (HUD) requirements of 24CFR Part 91, Subpart B, which govern the preparation of Consolidated Plans (Con Plan), Annual Action Plans (AAP), Assessment of Fair Housing (AFH) and the Consolidated Annual Performance Report (CAPER) for the Urban County of Macomb (County), and the Macomb HOME Consortium (MHC).

**1. Purpose:** The CPP has several objectives, including:

a. adequately informing citizens (including minority, non-English speaking, disabled, lower-income, and those likely to be affected by program activities) so that they can knowledgeably participate in program planning and development; and can review performance for the programs covered.

b. soliciting views and opinions from the public and community stakeholders, including housing providers, non-profit service agencies, local communities, regional planning entities, and the State of Michigan concerning housing and community development needs, particularly as they relate to lower-income residents.

c. coordinating program development and delivery between public and private entities which provide housing and human services, and between units of government concerning area-wide issues.

d. informing citizens of the processes followed in developing and managing the programs covered by the CPP.

**2. Encouragement of Citizen Participation**

a. Citizens are encouraged to participate in the development and implementation of the AFH, Con Plan and AAP, in amendments thereto, and in the CAPER. At a minimum, the Con Plan, AAP, CAPER and AFH will be posted on the County's website for citizen review and possible input.

b. Attention is given to lower-income persons, particularly those living in slums or in blighted neighborhoods, in predominantly lower-income neighborhoods, and in other areas where CDBG, HOME and other community development funds are likely to be proposed for use. "Predominantly low- and moderate income neighborhood" is defined by the County as any census tract block groups located within the jurisdiction of the Urban County CDBG program and the MHC in which at least 51% of the residents have incomes that qualify as low-to moderate-income. Reasonable actions will be taken to encourage participation by citizens, including minority, disabled, and non-English speaking persons. Actions may include, but are not limited to, surveys, outreach meetings, public hearings, and community reports and plans.

c. The County will collaborate with public housing commissions and with owners and managers of assisted housing developments within the MHC jurisdiction, to facilitate participation by public and assisted housing residents (including any resident advisory boards, resident councils, and resident management corporations) The County will also encourage participation of other low-income residents of targeted revitalization areas in which public and assisted housing is located for the purposes cited above.

d. The County will inform housing commissions of Con Plan objectives, AAP activities, AFH objectives and CAPERs, particularly as they relate to their developments and the surrounding areas so that they can make this information available at their annual public hearing required for their Agency Plans and Comprehensive Grant programs if, and as, applicable.

e. The County will take reasonable steps to encourage participation of local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, non-

profit organizations, philanthropic organizations and community and faith based organizations).

### **3. Citizen comment on the Citizen Participation Plan and Amendments**

The County will make this CPP public, by posting it on the County's website, thereby providing citizens, including those with disabilities, opportunity to review and comment on this CPP, and any future related amendments. Citizens will be provided thirty (30) days to comment on the CPP and any future related amendments to the CPP. A public hearing will be conducted for any amendment to the CPP. A notice (including the date, time, and location for the hearing) will be published at least 15 days prior.

### **4. Dissemination of Information**

The Con Plan is a strategic plan, effective for a 3 – 5 year period of time, which sets forth a detailed analysis of housing and community development conditions and needs within the 24 community jurisdiction of the MHC. It also sets forth priority goals and objectives to guide the applicable Programs during the effective period. The County will therefore provide the following information to citizens and stakeholder organizations, for their informed participation in the development of the Con Plan, and AAP, and substantial amendments thereto:

- The amount of assistance to be received (including anticipated grant amounts and program income expected);
- The range of activities that may be undertaken, including the estimated amount of funds that will benefit low- and moderate-income persons; and
- How it plans to minimize displacement of persons, and assist any displaced persons, specifying the types and levels of assistance to be made available by itself or by other legally-responsible entities, even if no displacement is expected.

a. General information, including a summary of the Con Plan and/or AAP (and proposed AFH, as applicable) will be disseminated in the public notice announcing the date(s), time(s) and venue(s) of the hearing(s). Detailed information is available on the websites of the County and individual MHC member communities (when applicable), and will also be provided at the hearing(s) for those who attend.

b. The County will implement the general requirements outlined in item "a" above by:

- Publishing a notice of the pending Public Hearing, Con Plan, AAP, AFH, and CAPER, in a newspaper of general circulation, to provide citizens, public agencies, and other interested parties knowledge of the action, and to direct them to the appropriate website for detailed information, including the draft document. The notice will also advise the public that a copy is available for review at the County offices. Finally, the notice will advise the public of its right to (and how to) submit comments.
- Placing the Con Plan, AAP, CAPER, and AFH on the County's website, along with other program information concerning funding amount(s), eligibility, compliance with program requirements, and other pertinent information.
- Making copies of the proposed Con Plan, AAP, AFH and CAPER available for review at the administration office of Macomb Community Action, the Clinton Township Municipal Building, the City of Roseville City Hall, the City of Sterling Heights City Hall and, when appropriate, area libraries and other public places. One free copy of these documents will be provided to citizens and groups upon request.
- Providing thirty (30) days for public comment, after public notice of the proposed Con Plan and/or AAP and AFH has been published in a newspaper of general circulation.
- Providing fifteen (15) days of public comment after public notice of the CAPER has been published in a newspaper of general circulation.
- The County will make every reasonable effort to encourage the participation of minorities, non-English speaking persons, limited English proficiency persons and persons with disabilities. Efforts may include, but are not limited to, making reports available in a format that is accessible to persons with disabilities (e.g., providing oral, Braille, electronic, or large print copies for the visually impaired); providing translation of notices and vital documents; and translation services at public hearings. Such requests will require at least a five (5) working day notice so that adequate arrangements can be made.

- The County will provide Public Housing Authorities (PHA) with information about its Con Plan activities, and the AFH and Affirmatively Furthering Fair Housing (AFFH) strategy, as applicable, related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing(s) required for the PHA plan.
- AFFH requirement, as applicable. As soon as feasible, after the start of the public participation process, the County will make available the HUD-provided data and any other supplemental information that will be incorporated into the AFH to residents, public agencies, and other interested parties by providing a link on the County's website that cross-references the data on HUD's website.

## **5. Public Hearings**

In order to encourage informed participation two (2) public hearings per year will be held to obtain resident's views and to respond to proposals and questions. The hearings will be held at two different stages of the program year. These hearings will address housing and community development needs, development of proposed activities, proposed use of funds, proposed strategies and actions for affirmatively furthering fair housing consistent with the AFH, and to review program performance. The County will meet this requirement by holding one public hearing during development of the Con Plan and/or AAP (or the AFH, as applicable). The second public hearing will be for the purpose of reporting program performance prior to submission of the County's Consolidated Annual Performance Evaluation Report (CAPER).

### **a. Development of the Con Plan:**

There will be one public hearing for citizens, and 2 additional focus group meetings with housing, social service, and health agencies, concerning the Con Plan and other basic program requirements. Information concerning funding projections over the life of the Con Plan, the County's plan to minimize displacement and assist any displaced person, and general activity information, will be provided. The major goal will, however, be to obtain views concerning community needs and incorporate them in the Con Plan.

- There will be two focus group meetings: one for housing providers, including housing commissions, and one for social service and health agencies, both of which will include any relevant community and faith-based organizations. These meetings will occur, before the preliminary Con Plan is drafted, so that the views aired may be considered for incorporation.

The public hearing will occur before the Con Plan is published for public comment and submitted for review and approval by the County's Board of Commissioners. This hearing will occur simultaneously with presentation of the County's AAP. MHC members will hold their own hearings in compliance with their own CPP.

### **b. Development of the Annual Action Plan**

Each year, the County must prepare an AAP (outlining strategies, actions, and activities to be undertaken during the coming year) for its CDBG, HOME, ESG, and any special program allocations coming from HUD. The AAP must be developed in consultation with citizens and stakeholders, and at least one public hearing will occur before the plan is published for public comment (MHC members are responsible for developing their CDBG AAP's). There are 21 local communities in the Urban County. CDBG funds are allocated to each community which develops its own program in conformance with law and regulation, and in conformance with the Con Plan. Macomb County and the MHC member communities must develop uses for HOME funding as well.

The 21 local communities in the Urban County CDBG program will meet this requirement in the following manner:

- A general community meeting will be held early in the planning cycle. Communities receive essential program information, and are encouraged to ask questions and discuss concerns at this time.
- Each community will conduct its own public hearing to solicit citizen views on activities, and to provide eligibility, funding and other information essential to inform participation. These

hearings will occur prior to the community submitting its application for funding to the County. Each community must provide its residents with a 15 day notice of the public hearing in a manner in which will result in informed comment (publication, physical posting at local government offices, and/or website posting).

- The County level public hearing will be held before the proposed AAP is published for public comment, prior to its submission for review and Board of Commissioner adoption. This hearing will be coincident with that for the Con Plan, when appropriate.

#### c. Development of the Assessment of Fair Housing

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 County will hold one public hearing prior to publishing the AFH for public comment.

#### d. Amendments to the Con Plan or AAP

The County may find it necessary to amend its Con Plan or AAP, due to exigency or to further Con Plan or AAP goals and activities. Sometimes one or several such changes may substantially (defined below) alter the Plan(s) to such an extent that public input is required. The County has therefore established the following criteria to establish a threshold to require further public participation.

##### Definition of Substantial Amendment:

- Consolidated Plan: Any significant change in priorities, goals and objectives (e.g. new addition or deletion of existing) outlined in the Con Plan.
- Annual Action Plan: One, or several cumulative activity changes, equal to 20% of any year's grant funding, or any change that would significantly affect the outcomes of the Con Plan or AAP as approved by HUD. Change, as defined, affects the size, scope, location, or beneficiaries of activities. MHC members will follow their own citizen participation plans for changes to their CDBG program.

#### e. Revising an accepted Assessment of Fair Housing

An AFH previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances:

- A material change is a change in circumstances in the jurisdiction of a program participant that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances. Examples include Presidentially declared disasters, under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 *et seq.*), in the program participant's area that are of such a nature as to significantly impact the steps a program participant may need to take to affirmatively further fair housing; significant demographic changes; new significant contributing factors in the participant' jurisdiction; and civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or
- Upon HUD's written notification specifying a material change that requires the revision.

Revisions to an AFH, as described in this section, are subject to community participation. The County will follow the notice and comment process applicable to Con Plan substantial amendments provided in the previous section.

f. Citizen Notification: Citizens will have reasonable notice and opportunity to comment on the Con Plan, and AAP (or the final AFH as applicable) or any substantial amendment or revisions to the same: 1) a public notice explaining the nature of, and reasons for, the amendment or revision and, 2) a public hearing. Citizens will be directed to the website of the County or (for HOME) the MHC member communities (when applicable) for detailed information. The notice will be published in a newspaper of general circulation, and will advise the public of the date, time and venue for the

hearing. Citizens will be provided at least thirty (30) days for public comment before such amendments are implemented or the revision to HUD is submitted to HUD for review.

**g. Consideration of Comments Received:**

The County and MHC member communities will consider any comments or views received (oral, written or electronic), as they pertain to the Con Plan, and AAP (or the final AFH as applicable) or any substantial amendment or revisions to the same. A summary of comments and how they were considered will be attached to the Con Plan, and AAP (or the final AFH as applicable) in conformance with HUD regulations.

**6. Performance reports**

The County will provide citizens with reasonable notice and an opportunity to comment on program performance before submission of the CAPER. Each member of the MHC will follow its own CPP for its CDBG program. For purposes of the County's CDBG program and the MHC HOME programs, the following applies:

a. Reasonable notice will be provided through notice in a newspaper of general circulation, indicating where the report may be reviewed, and notifying the public that a public hearing will be held for the purpose of evaluating Program performance. The Notice will indicate that the CAPER may be reviewed on the County's website. This Notice will be published at least fifteen (15) days before the Public Hearing. Citizens will be provided at least fifteen (15) days for public comment after public notice of the CAPER has been published in a newspaper of general circulation. The public comment period and public hearing will be conducted prior to submission of the CAPER to HUD.

b. The County and, when appropriate, MHC member communities, will consider written, electronic, and oral comments received before CAPER submission. A comment summary will be attached to the report, along with a narrative explanation of how they were considered.

**7. Meetings**

The County will inform citizens of the dates and locations for public hearings and meetings through public notices which will appear in a newspaper of general circulation at least fifteen (15) days in advance of the event. Times and locations for meetings will be convenient to potential and actual beneficiaries. Meeting notices will include information related to requests for reasonable accommodations, 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 28CFR parts 35 and 36 as applicable.

**8. Availability to the Public**

All Plans, Amendments, and Reports covered by this CPP will be available to the public, including persons with disabilities, at Macomb Community Action, located at 21885 Dunham Road Suite 10, Clinton Township, MI 48036. They will also, when appropriate, be available at the Clinton Township Planning Department, at 40700 Romeo Plank Rd., Clinton Township MI, 48038, at the City of Roseville City Hall, 29777 Gratiot Avenue, Roseville MI, 48066, and at the City of Sterling Heights Development Division, 40555 Utica Rd., Sterling Heights MI, 48314. These documents will also be posted online at the websites of the County and MHC member communities.

**9. Access to Records**

All plans (Con Plan and/or AAP, and AFH) including amendments and revisions, reports (CAPER), use of assistance under the programs covered by this Plan and documents related to the use of assistance under the program covered by this Plan (except for portions covered by Federal and State privacy statute) are public and are therefore available for review by citizens, public agencies, and other interested parties. Any person or entity may obtain these documents and records, for the preceding five years, by filing a written request with, or calling the County at 586/466/6256 (Urban County and MHC), the Planning Department at 586/286/9325 (Clinton Township CDBG and Clinton Township HOME projects), the Community Development Department at 586/447/4606 (Roseville CDBG and Roseville HOME projects), and the Development Division at 586/446/2724 (Sterling

Heights CDBG and Sterling Heights HOME projects). Five (5) days advance notice is required.

The County will make every reasonable effort to encourage the participation of minorities, non-English speaking persons, limited English proficiency persons and persons with disabilities. Efforts may include, but are not limited to, making reports available in a format that is accessible to persons with disabilities (e.g., providing oral, Braille, electronic, or large print copies for the visually impaired); providing translation of notices and vital documents; and translation services at public hearings. Such requests will require at least a five (5) working day notice so that adequate arrangements can be made.

#### **10. Technical Assistance**

Groups representing lower-income persons may receive help so that they may develop funding proposals under any of the programs covered by the Con Plan. The County will provide basic levels of assistance so that the group will be able to make informed decisions regarding its ideas for funding. No monetary assistance will be provided. MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

#### **11. Complaints**

The Urban County (and its 21 participating communities) will substantively respond in writing to oral and written questions and complaints pertaining to the Con Plan, AAP, Amendments, AFH (including revisions) Environmental Reviews Records, Requests for the Release of Funds and the CAPER in a timely manner, usually within fifteen (15) working days, where practicable MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

#### **12. Use of Citizen Participation Plan**

The County will follow the measures outlined in this Plan, except in cases of public exigency, or unless otherwise instructed by HUD. MHC members will follow their citizen participation plans in matters pertaining to their CDBG programs.

#### **13. Responsibility for Development and Implementation**

Nothing in this Plan restricts the responsibility or authority of the Urban County, its participating communities, or MHC member communities in Program Development and implementation. This provision does not apply to the CDBG programs of Clinton Township, Roseville and Sterling Heights.

#### **14. Exceptions**

In event of a local, state, and national natural disaster or declaration of emergency, existing and new funding may be allocated or re-allocated in an expedited time frame. To streamline the allocation process and reduce delays in accessing grant funds Macomb County and the members of the Macomb HOME Consortium will follow HUD notices, waivers, award letters or other HUD communication. To achieve this minimum citizen participation requirement, it will be applied per HUD notices, waivers, award letters or other HUD communication to the Consolidated Plan and/or substantially amended Action Plan(s).

Expedited procedures must include notice and reasonable opportunity to comment of no less than five (5) days. In addition, meetings may be facilitated by the most feasible means at the time (ex: virtual or call-in meetings in lieu of public gatherings). Meetings must still accommodate and provide information to those with vision and hearing impairments to the best extent feasible. At a minimum, the meeting must still comply with the Open Public Meetings Act.