

City of Spokane

Community, Housing & Human Services Department Housing & Urban Development Entitlement Programs Citizen Participation Plan



INTRODUCTION

The City of Spokane is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD). As such, the Community, Housing, and Human Services (CHHS) Department is responsible for conducting administrative responsibilities related to the Community Development Block Grant (CDBG) Program. Federal regulations mandate entitlement communities develop and adhere to their Citizen Participation Plan when administering CDBG funds (24 CFR 91.105). This Citizen Participation Plan will be updated when necessary and provide fifteen (15) days' public notice of any changes.

PURPOSE OF THE CITIZEN PARTICIPATION PLAN

The purpose of the City of Spokane's Citizen Participation Plan is to:

- 1. Provide guidance to the Spokane community to promote and expand citizen participation in the Consolidated Planning process
- 2. Provide citizens with an avenue for making public comment
- 3. Support transparent communication between CHHS and the Spokane community

The City of Spokane maintains responsibility for the administration of all documents and activities related to the Consolidated Planning process. This Citizen Participation Plan is intended to outline areas for public input and participation. CHHS is responsible for drafting, presenting to the community, making edits, consideration of public comment, and submission of all Consolidated Planning documents (Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report) to HUD.

USE OF THE CITIZEN PARTICIPATION PLAN

CHHS will adhere to the guidance provided in this Citizen Participation Plan. Citizens may submit public comment to any alteration of this plan. CHHS reserves the right to amend and edit this document as necessary. Citizens will be notified whenever this document is amended and given an opportunity to make public comment during a period not less than fifteen (15) calendar days. CHHS will provide a summary of all public comments received relating to amendments of the Citizen Participation Plan.

PROGRAMS INCLUDED IN THE CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan focuses on three separate programs that make up the City of Spokane's Entitlement Program portfolio. The three programs are as follows:

Community Development Block Grant Program (<u>24 CFR Part 570</u>)

The CDBG Entitlement Program provides annual grants on a formula basis to entitled cities and counties which follow HUD's objective to, "Develop viable urban communities by providing decent housing and a

suitable living environment and by expanding economic opportunities, principally for low- and moderate-income persons." The CDBG Program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-5301 et seq.

HOME Investment Partnerships Program (24 CFR Part 92)

The HOME Investment Partnerships Program (HOME) provides formula grants to jurisdictions, including the City of Spokane. The City may use HOME funds in partnership with local nonprofit groups or private developers to fund a wide range of activities, including acquisition, building, and/or rehabilitating affordable housing for rent or homeownership, and may provide direct rental assistance to low-income people with tenant based rental assistance (TBRA). HOME is the largest Federal block grant to state and local governments, and it is exclusively designed to create affordable housing for low- and moderate-income households. HOME request for proposals (RFPs) are held separately from CDBG RFPs due to the goals and projects considered under each funding stream. Therefore, public participation for HOME funding may vary from CDBG public participation for their timelines and approval processes.

Emergency Solutions Grants Program (24 CFR Part 576)

Emergency Solutions Grants (ESG) funds may be used to provide a wide range of supportive services under the five program components: Street Outreach, Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and Community Management Information System (CMIS). The public participation process for ESG is governed by the Continuum of Care (COC) Board. For information regarding ESG's public participation, please contact CHHS and the COC.

CITIZEN PARTICIPATION ENCOURAGEMENT

The City of Spokane is required to adopt a Citizen Participation Plan that sets forth policies and procedures for citizen participation to encourage and inform the public of the process and opportunity to provide input (24 CFR 91.105(a)(1)). The CHHS Department is responsible for the creation of a Consolidated Plan, which sets forth goals for five years; Annual Action Plan(s) (AAPs) to carry out the goals of the Consolidated Plan; Consolidated Annual Performance and Evaluation Report(s) (CAPERs); and an Assessment of Fair Housing (AFH), which is a five-year assessment of fair housing statistics affecting the City.

Each document is discussed in greater detail below, including citations of the corresponding federal regulations. Citizens are encouraged to become familiar with these community planning documents and offer comment on ways to strengthen our community impact for low-and moderate-income individuals and families.

Please see the chart in Appendix A for a quick reference on required and optional public processes, and public notice methods for these and other documents used in HUD entitlement programs.

Consolidated Plan (24 CFR 91.200)

The Consolidated Plan is designed to help the City of Spokane assess affordable housing, community development needs, and market conditions to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing

and community development priorities that align and focus on funding from the entitlement programs: CDBG, HOME, and ESG. Several community partners develop strategic plans which will be recognized and considered when the Consolidated Plan is produced. Though these plans may or may not contain CDBG, HOME, or ESG eligible activities, it may be possible to identify where and how entitlement funds may be able to leverage these activities. Examples of plans reviewed include, but are not limited to, Priority Spokane, Spokane's Housing Action Plan, and the 5-Year Strategic Plan to Prevent and End Homelessness.

The CHHS Department will seek participation from local and regional partners related to the goals of HUD's entitlement programs. Participation will be sought from the Regional Heath District, City/County Continuum of Care, Spokane County Housing and Community Development, Broadlink PDA, social service providers, the Community Assembly, community centers (including youth and seniors), nonprofit developers, businesses, elected officials, CHHS Board and Committee members, and City departments involved with program implementation.

Annual Action Plan (24 CFR 91.220)

The Consolidated Plan is carried out through Annual Action Plans (AAPs), which provide summaries of the actions, activities, and the specific federal and non-federal resources used each year to address the priority needs and specific goals identified by the Consolidated Plan. The AAP will not provide details on the HOME allocations at the time of publication, due to the timing of each RFP and the extended time needed to establish HOME loan agreements. HOME projects need time to gain other public funds, layering the various funds to accomplish low-income housing projects. Public notice of HOME allocations will be provided annually in January along with preliminary allocations for CDBG funding.

Consolidated Annual Performance and Evaluation Report (24 CFR 91.520)

CHHS reports on accomplishments of each Annual Action Plan to show progress toward the Consolidated Plan's goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

Assessment of Fair Housing (24 CFR 5.152)

The Assessment of Fair Housing (AFH) is designed to improve community planning and overcome fair housing issues. The AFH process begins with inclusive community participation and results in the establishment of fair housing goals to increase fair housing choice and provide equal access and opportunity for all community members. Fair housing barriers will be considered while developing the Consolidated Plan.

Citizen Participation Plan (24 CFR 91.105)

The Citizen Participation Plan (CPP) sets forth the policies and procedures for citizen participation throughout the Consolidated Planning process. The CPP must facilitate citizen participation during initial development of the Consolidated Plan, define and explain the substantial amendment process, and provide comment opportunities. CPP regulations require, and CHHS desires, to have active citizen participation, with a special emphasis on participation from the following populations:

- Low- and moderate-income persons
- Residents of slums, blighted areas, and predominately low- and moderate-income areas

- Non-English-speaking persons
- Persons with disabilities
- Public housing residents

Program Year Cycle

The CHHS Program Year runs from July 1 to June 30 each year. In late summer, CHHS publishes a Request for Proposals (RFP) of CDBG funds. This notice includes the amount of funding the City of Spokane 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 low- and moderate-income populations. A similar process begins in spring with the HOME RFP.

After an RFP is released, CHHS will schedule applicant workshops for applicants who may apply for CDBG and HOME funds. Applicant workshops will provide an overview of program objectives, eligible activities, eligible applicants, funding policies, and application procedures. Proposal evaluation and selection criteria are also discussed. Following the applicant workshops, CHHS staff will be available to provide individualized technical assistance upon request.

For detailed information on the CHHS Program Year cycle, including funding priorities, anticipated funds available, and the RFP application process, please reference the most recent CDBG Funding Policies & Procedures, which are updated annually, and posted on the CHHS Funding Opportunities webpage: https://my.spokanecity.org/chhs/funding-opportunities/chhs/.

DEVELOPMENT OF THE CONSOLIDATED PLAN AND ASSESSMENT OF FAIR HOUSING

Citizens are encouraged to actively engage in the development of each Consolidated Plan and Assessment of Fair Housing plan. Both plans are intended to guide current and future efforts to benefit the Spokane community. Participation is not limited to any one group or organization. All citizens have the opportunity to provide meaningful feedback that leads to plans inclusive of all Spokane residents. A thirty (30) day public comment period and a public hearing are required for the Consolidated Plan and the Assessment of Fair Housing.

Data for Public Review and Comment

CHHS will make information available when developing the Consolidated Plan and Assessment of Fair Housing plan. Citizens will have an opportunity to review the plans via the CHHS website (https://my.spokanecity.org/chhs/). Citizens will also have opportunities to comment prior to adoption of the Consolidated Plan and AFH by attending CHHS Board and other related meetings.

CHHS will publish a Request for Proposals (RFP) to identify priority projects/activities that successfully carry out high priority community needs and goals of the Consolidated Plan. The RFP will include information related to annual funding priorities as they relate to Consolidated Plan goals; the amount of funds available to benefit low- and moderate-income individuals; and eligible activities for the Program Year. All CHHS funded projects and activities for CDBG, HOME, and ESG must comply with the Uniform

Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs (as outlined in 49 CFR Part 24).

Publishing the Consolidated Plan and Assessment of Fair Housing

CHHS will make available draft copies of the Consolidated Plan and AFH on the City's website for review and comment prior to adoption by the City Council. Citizens are encouraged to participate in public outreach efforts and provide public comment related to each draft plan. Public notice will be provided in the local newspaper legal ads. Other types of public notice may include the City newsletter, CHHS website, and communication with 29 neighborhood councils through the Community Assembly. Hard copies will be made available upon request. Citizens requesting hard copies may retrieve their documents by reserving a time with staff and visiting Spokane City Hall.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

CHHS will seek public comment as part of the Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are encouraged to review the CAPER and evaluate progress toward achieving the goals identified in the Consolidated Plan. Interested citizens are encouraged to attend the CHHS Board Public Hearing. Staff will present accomplishments and areas for improvement during the public hearing.

Citizens will have fifteen (15) calendar days to review the CAPER and submit public comment for inclusion in the CAPER. CHHS will consider all public comments and summarize them in the report. CHHS will accept public comment in-person, via email (spokanechhs@spokanecity.org), or phone (509-625-6325).

SUBSTANTIAL AMENDMENTS TO PRIOR YEARS' PLANS

CHHS may, on occasion, be required to substantially amend the Consolidated Plan or an Annual Action Plan which has already been adopted by City Council and accepted by HUD. CHHS will notify the public of substantial amendments to prior years' plans, as required by HUD. Substantial amendments may be the result of HUD direction for special funding, the cancelation of a project already approved in an Annual Action Plan, and/or a funding change greater than 30% of the original award. Consolidated Plan amendments are a result of amendment requests by the community to adjust priorities to accommodate community needs not previously identified in the Consolidated Plan. Amendments to the Consolidated Plan may be submitted for consideration during any public comment period or via email to spokanechhs@spokanecity.org.

PUBLIC MEETINGS

Citizens are encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4:00-6:00 pm. Meetings are held at Spokane City Hall in the City Council Briefing Center; virtual/hybrid options are available. Public comment is allowed on items relevant to the CHHS Board during the first ten (10) minutes of each meeting. The CHHS Board welcomes comments on CHHS planning documents and reports, as well as HUD entitlement processes and procedures.

PUBLIC HEARINGS

CHHS will host no less than two (2) Public Hearings with the CHHS Board during each calendar year. The CHHS Board will host Public Hearings which allow for formal public comment periods. Public Hearings will be held for Consolidated Plans, Assessments of Fair Housing, Annual Action Plans, substantial amendments to prior years' plans, Consolidated Annual Performance and Evaluation Reports, and special funding allocations.

Citizens also have the opportunity to provide public comment at the City Council meeting where each Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing is briefed. Citizens will have an opportunity to provide public comment during the initial briefing and again prior to the final City Council vote. CHHS will take all public comments offered to City Council into consideration.

CHHS will publish a notice announcing every comment period and public hearing according to this Citizen Participation Plan. CHHS will accept all public comments and summarize them in the plans. Please refer to Appendix A for specific details.

ACCESS TO RECORDS AND TECHNICAL ASSISTANCE

CHHS will make electronic and print copies of the Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report available to the public for review and comment on its website: https://my.spokanecity.org/chhs/documents/. Individuals may request a print copy of a document(s) by submitting a formal request to CHHS in writing, via email, in person, or via phone call:

City of Spokane Community, Housing, and Human Services Department (CHHS)

6th Floor, Spokane City Hall 808 W. Spokane Falls Blvd Spokane, WA 99201 (509) 625-6325

spokanechhs@spokanecity.org Hours: M-F, 8:00 AM to 5:00 PM https://my.spokanecity.org/chhs/

Citizens may make a formal public records request to CHHS or the City of Spokane at any time. The City of Spokane has a formal policy (ADMIN 0260-10-03) for making a public records request. Individuals wishing to make a formal public records request are encouraged to visit the City of Spokane webpage (https://my.spokanecity.org/administrative/public-records/) for specific information and instructions. Individuals may also contact the City Clerk's office for additional information regarding access to public records:

Office of the City Clerk

5th Floor, City Hall 808 W. Spokane Falls Blvd. Spokane, WA 99201 (509) 625-6350

clerks@spokanecity.org

Hours: M-F, 8:00 AM to 5:00 PM

https://my.spokanecity.org/administrative/public-records/

CHHS offers opportunities for technical assistance to all agencies and individuals, upon request. CHHS works with partner agencies and the CHHS Board to ensure basic program requirements are understood. Parties wishing to meet with CHHS staff to review planning documents or become more familiar with program requirements are encouraged to contact CHHS and request technical assistance.

Technical assistance includes:

- Program rules and regulations
- Requirements for implementing and managing projects
- Project eligibility and national objectives requirements
- Understanding CHHS Department planning documents

Please request technical assistance by contacting the CHHS Department using the information above.

ACCESSIBILITY

The City of Spokane is committed to providing equal access to its facilities, programs, and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd, is wheelchair accessible and equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) at the City Cable 5 Production Booth located on the first floor of City Hall, or through the meeting organizer.

Individuals requesting reasonable accommodations or further information should contact Risk Management via phone (509-625-6221), mail (808 W. Spokane Falls Blvd, Spokane, WA, 99201), or email (mlowmaster@spokanecity.org). Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7-1-1. Please contact the City forty-eight (48) hours before the meeting date.

COMPLAINT PROCEDURE

Complaints from the public regarding entitlement programs or the Consolidated Planning process must be submitted in writing to the CHHS Department:

City of Spokane Community, Housing, and Human Services Department (CHHS)

6th Floor, Spokane City Hall 808 W. Spokane Falls Blvd Spokane, WA 99201 spokanechhs@spokanecity.org (please put "Complaint" in subject line) The CHHS Department, where applicable and practical, will respond to a written complaint within 15 working days of its receipt.

CONTACT INFORMATION

Citizens are encouraged to offer public comments at any time by contacting the CHHS Department via email (spokanecity.org) or phone (509-625-6325).

Citizens are also encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4:00-6:00 pm. Meetings are held at Spokane City Hall in the City Council Briefing Center; virtual/hybrid options are available. Public comment is allowed on items relevant to the CHHS Board during the first ten (10) minutes of each meeting.

APPENDIX A: CHHS DOCUMENTS AND REPORTING – LEVELS OF APPROVAL

CHHS Documents and Reporting	Legal Ads – Public Notice Required	Optional Public Notice Methods	Minimum Comment Period	CHHS Board Public Hearing	City Council Committee	City Council Briefing Session	City Council Legislative Session
Consolidated Plan & Annual Action Plans	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	YES	YES	YES
Assessment of Fair Housing	YES	Website City newsletter Social media	15 calendar days	YES	YES	YES	YES
Substantial Amendment(s) to Prior Years' Plans	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	NO	NO	NO
Amendment(s) to Consolidated Plan Priorities	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	NO	NO	NO
Funding Policies & RFP	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO
Citizen Participation Plan	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO
Consolidated Annual Performance & Evaluation Report (CAPER)	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO