

City of Goshen
Citizen Participation Plan
Community Development Block Grant Program
Revised September 10, 2020

In accordance with guidelines established by the US Department of Housing & Urban Development (HUD) in 24 CFR 91.105 and 91.505, the City of Goshen is revising the Citizen Participation Plan for the Community Development Block Grant (CDBG) program.

The Citizen Participation Plan establishes procedures for obtaining the views of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties regarding the use of CDBG funds. Other interested parties include, among others, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies responsible for the management of flood prone areas, public land or water resources, and emergency management agencies.

Of particular importance are the views of persons of low and moderate income, who are intended to be the principal beneficiaries of the CDBG program, and residents of areas where activities are expected to take place. The participation of all City of Goshen residents will be encouraged, including minorities, non-English speaking persons, and persons with disabilities, and the City will take the appropriate actions to encourage this participation.

Citizen input is essential in the following areas of the CDBG process:

1. Identification of housing and community development needs;
2. Development of the Consolidated Plan;
3. Development of the Annual Action Plan;
4. Development of the Citizen Participation Plan;
5. Substantial amendments to the Consolidated Plan or the Annual Action Plan; and
6. Annual performance report.

Citizen participation will be accomplished through public meetings, public hearings, public comment periods, Internet postings, focus groups, and through contacts with City officials.

Documents Available for Public Review & Comment

When documents are available for public review and comment, notice of the availability of the document will be published in the *Goshen News*, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Public Hearings

Public hearings will be held in order to address housing and community development needs, the development of proposed activities, and the review of program performance. Notice of the time, date and place of each public hearing will be published in the *Goshen News* at least seven days prior to the scheduled public hearing.

Notices announcing the public hearing will be posted on the City website and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care,

businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority.

Public hearings will be scheduled at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The public hearing notice will state that non-English speaking persons and others needing special assistance to participate in the public hearing process should contact the City to make the necessary accommodations.

A minimum of two public hearings will be held each program year, during two different stages of the program year. One public hearing (program planning hearing) will be held during the development of the consolidated or annual plan and before the proposed consolidated or annual plan is published for comment in order to obtain the views of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations and other interested parties on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. In addition to addressing housing and community development needs, this public hearing will address the development of proposed activities and review of program performance. A second public hearing (plan or program review hearing) will be held either during the comment period for the consolidated or annual plan, or during the comment period for the annual performance report. Depending on its timing, this public hearing will address the development of proposed activities and/or review of program performance. All public hearings will seek to obtain the view of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations and other interested parties, and will respond to proposals and questions.

Virtual Public Hearings

If a required public hearing occurs during a public health or other emergency, when public gatherings are limited by the emergency, a virtual public hearing may be held in place of an in-person public hearing using an online platform that facilitates public access. Notice of the public hearing will follow the procedures outlined in the preceding section.

Program Planning Hearing

The public hearing addressing housing and community development needs will also address the development of proposed activities and will include a review of program performance. The following points will be included:

1. Total amount of CDBG funds expected to be available for community development and housing activities.
2. Activities that may be undertaken with these funds and the estimated amount that will benefit persons of low and moderate income.
3. Discussion of CDBG program requirements.
4. Processes to be followed in applying for CDBG funds.
5. Comments, suggestions and input for the development of the consolidated or annual plan, particularly from persons of low and moderate income and neighborhood residents living in areas where CDBG funds are proposed to be used.

Plan or Program Review Hearing

The plan or program review hearing will include the following:

1. Review of CDBG program requirements.
2. Review of citizen proposals and comments from the program planning public hearing.
3. Proposed community development and housing objectives and activities or review of previous program year CDBG objectives and activities.
4. Proposed use of CDBG funds or review of previous program year use of CDBG funds.
5. Comments, suggestions and input in response to the proposed plan or in response to the performance report.

Assessment of Performance

At all public hearings, citizens and citizen organizations will be given the opportunity to assess and comment on all aspects of the City's CDBG performance. This assessment will include a determination as to whether objectives have been achieved. All comments or views of citizens received in writing or orally at public hearings will be considered during the preparation of the annual performance report. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final performance report submitted to HUD.

The annual performance report to HUD will include the following:

1. Status, including objectives and goals, of each CDBG activity.
2. Financial report for each CDBG activity.

Notice of the availability of the annual performance report will be published in the *Goshen News*, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. The annual performance report will be available for public comment for a minimum of 15 days following the published notice.

Adoption of a Consolidated or Annual Plan

Notice of the availability of the consolidated or annual plan will be published in the *Goshen News*, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. The consolidated or annual plan will be available for public comment for a minimum of 30 days following the published notice. All comments or views of citizens received in writing or orally at public hearings and during the public comment period will be considered in the preparation of the consolidated or annual plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final consolidated or annual plan.

Objections to the City of Goshen's CDBG Application

Persons or groups wishing to object to approval of the City's CDBG application to the US Department of Housing & Urban Development (HUD) may do so by contacting:

Department of Housing & Urban Development
Community Planning & Development
575 N Pennsylvania Street, Suite 655
Indianapolis, IN 46204

HUD will consider objections only on the following grounds:

1. The applicant's description of needs and objectives is plainly inconsistent with available facts and data; or
2. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; or
3. The application does not comply with the program requirements or other applicable law; or
4. The application proposes activities which are ineligible.

Displacement and Relocation

According to the City's Residential Antidisplacement and Relocation Assistance Plan adopted April 23, 1990, it is the City's policy to undertake activities which will not require involuntary displacement or relocation, to the

maximum extent feasible. Should displacement or relocation result from CDBG activities, the guidelines found in 24 CFR 570.606 will be followed.

Complaints & Grievances

Complaints and grievances must be filed in writing with the CDBG Administrator, 204 E. Jefferson Street, Suite 4, Goshen, IN 46528. Written answers to properly filed complaints and grievances will be provided within 15 working days, where practicable.

Availability of Information

The City of Goshen will make available, upon written request for a specific record, copies of program records and information concerning the CDBG program, to any Goshen resident or organization, to the extent that such requests are consistent with consideration of personal privacy and obligations of confidentiality. Written requests should be submitted during normal working hours to the following office:

CDBG Administrator
Goshen City Planning Office
204 E Jefferson Street, Suite 4
Goshen, IN 46528

Technical Assistance

The City will provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals, subject to a limitation determined by the City with respect to the resources available to the City and the overall objectives of the CDBG program.

Requests for technical assistance should be made to:

CDBG Administrator
Goshen City Planning Office
204 E Jefferson Street, Suite 4
Goshen, IN 46528
574-537-3815

Amendments to the CDBG Consolidated or Annual Plan

The Housing and Community Development Act of 1974 provides that amendments to the consolidated or annual plan may be made during any program year. Such amendments may include the reallocation of CDBG funds, the allocation of additional CDBG funds, the designation of new activities, changes in the use of CDBG funds from one eligible activity to another, and the designation of new locations for activities.

According to this Citizen Participation Plan, a substantial amendment is a budget change exceeding 30 percent of the total CDBG budget, initiation of new activities not included in the consolidated or annual plan. or changes in the use of CDBG funds from one eligible activity to another eligible activity not included in the consolidated or annual plan. A minor amendment is a budget change less than or equal to 30 percent of the total CDBG budget, or a change in the location of activities already included in the consolidated or annual plan. Within an annual plan, changes in the use of CDBG funds from one eligible activity to another eligible activity already included in the annual plan is not an amendment, provided allocation priorities are not modified.

Prior to the implementation of a minor amendment to the consolidated or annual plan, the public will be advised by published notice, as outlined previously, and given a minimum of 15 days to comment.

Prior to the implementation of a substantial amendment, a public hearing will be conducted, notice of the amendment will be published as outlined in the Public Hearings section above, and the public will be given a minimum of 30 days to provide comments.

All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Amendment Procedures for Meeting Urgent Needs

When amendments are required to the consolidated plan, annual plan, and/or Citizen Participation Plan to carry out activities to meet the urgent need national objective at 24 CFR 570.208(c), expedited citizen participation procedures will be allowed, including published notice to citizens with a public comment period of no less than five calendar days following the published notice, concurrent for all plans being amended. The five-day public comment period is considered reasonable notice and opportunity to comment for urgent need amendments, and these amendments, even if defined as substantial, will require no public hearing.