

CITIZEN PARTICIPATION PLAN

CITY OF WHEELING & THE NORTHERN PANHANDLE HOME CONSORTIUM, WV FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM, HOME INVESTMENT PARTNERSHIP PROGRAM & THE SECTION 108 LOAN GUARANTEE PROGRAM

SECTION I – GENERAL:

This Citizen Participation Plan is prepared in compliance with 24 CFR Part 91.105, *Citizen Participation Plan, Local Governments*. This Citizen Participation Plan sets forth the City of Wheeling's and the Northern Panhandle HOME Consortium's policies and procedures for citizen participation by encouraging citizens to participate in the development of the City's and the Consortium's Five Year Consolidated Plan and Annual Action Plans, any amendments to these plans, applications for Section 108 Loan Guarantees, and the Consolidated Annual Performance and Evaluation Reports (CAPER).

SECTION II – STANDARDS OF PARTICIPATION & GOALS FOR PARTICIPATION:

The Standards of Participation and Goals for Citizen Participation in the City of Wheeling and the Northern Panhandle HOME Consortium, West Virginia, are as follows:

- A. All aspects of the Community Development Block Grant (CDBG) Program, the HOME Program, and the Section 108 Loan Guarantee Program shall be conducted in an open manner with freedom of access for all interested persons, groups and/or organizations.
- B. To the greatest degree possible, there shall be involvement of: low- and moderate-income persons, especially those living in slum and blighted areas, in areas where CDBG funds and HOME funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods; members of minority groups; residents of the neighborhood revitalization strategy areas (NRSA); the elderly and frail elderly; persons with disabilities; and all persons directly or indirectly impacted or affected by the Community Development Block Grant Program, HOME Program, and Section 108 Loan Guarantee Program.
- C. Public Hearings shall be held in areas occupied by and accessible to low- and moderate-income individuals. In addition, the City of Wheeling's Department of Economic and Community Development staff will speak to any group about the City's Community Development Block Grant

Program, HOME Program, and Section 108 Loan Guarantee Program, the programs' past performance and any proposed or future activities.

- D. There shall be to the greatest extent possible, and throughout all stages of the planning and development of the CDBG, HOME, and the Section 108 Loan Guarantee Programs, a continuity of participation by citizen representatives.
- E. Citizens shall be provided, to the greatest extent possible, with timely and adequate information for the purpose of meaningful input into the CDBG, HOME and Section 108 Loan Guarantee Programs.
- F. Low- and moderate-income persons, residents of slum and blighted neighborhoods, residents of predominantly low- and moderate-income neighborhoods; members of minority groups; residents of neighborhood revitalization strategy areas; the elderly and frail elderly; persons with disabilities; and all persons directly or indirectly impacted or affected by the CDBG, HOME and Section 108 Loan Guarantee Programs, shall be encouraged to submit their views and proposals regarding the CDBG, HOME and Section 108 Loan Guarantee Programs.
- G. Advisory groups that may be established for advice and input into the CDBG program shall have an adequate representation of low and moderate income persons, members of minority groups, and persons directly affected by the CDBG program activities.
- H. Consultation will be made, in conjunction with the Wheeling Public Housing Authority, the participation of residents of public housing and assisted housing developments, during the process of developing and implementing the Five Year Consolidated Plan and One Year Annual Action Plans, along residents living within the area in which proposed developments are located.
- I. The City of Wheeling shall provide information to the Wheeling Housing Authority about consolidated plan activities related to the housing authority's developments and surrounding communities so that the housing authority can make this information available in their annual Public Housing Comprehensive Grant Program.

SECTION III – SCOPE OF PARTICIPATION:

A. Application Development:

Prior to the submission of the Five Year Consolidated Plan, Annual Action Plan, any application for CDBG funds, HOME funds, an application for

Section 108 Loan Guarantee funds, and prior to the submission of an application amendment, the City of Wheeling's Department of Economic and Community Development, in addition to meeting the minimum requirements, shall provide for public comment the following:

1. application requirements
2. eligibility of project activities
3. time table for submission
4. funding amounts of both CDBG funds, HOME and program income
5. range of activities that may be undertaken with available funds
6. estimated amount of benefit to persons of low- and moderate-income, and
7. any other information necessary to involve citizens in the development of plans and applications.

Information provided to the public will be in conformance with Section II above. Furthermore, prior to the development of an annual application for CDBG and HOME funds, the progress of the City's Community Development Block Grant Program and HOME funds will be made available to the public at meetings, public hearings and through the local news media.

B. Program Implementation:

Citizen involvement may take the form of advisory committees, direct involvement, self-help efforts or other types of citizen participation during program implementation. Annual reports of the City of Wheeling's Department of Economic and Community Development will be submitted to the Mayor, City Council, City Manager, and the general public for the purpose of reviewing the accomplishments of the City's CDBG and HOME Programs.

The roles that citizens of the area will play in the implementation of the CDBG and HOME programs are as follows:

1. "direct involvement and self-help" in project development and implementation
2. "continued advisory role" via call-ins, write-ins and group meetings with organized and recognized groups.

C. Monitoring Evaluation:

Opportunities for citizens to monitor and evaluate the CDBG and HOME programs shall be consistent and continuous. Methods available to further these objectives are as follows:

1. direct contact with staff
2. direct contact between staff and groups
3. direct contact between citizens and the Mayor, City Manager and local governing body.
4. annual report of staff.
5. progress reports via the news media on a continuing basis.

D. Submission of Views and Proposals:

The submission of views and proposals from low- and moderate-income persons, minority groups, and any other persons or organized groups can be on a continuous basis and shall be encouraged to the greatest extent possible. Submissions can be in the form of:

1. personal contact
2. mail, email, and telephone contact
3. petitions
4. attendance at public meetings/hearings
5. through media questionnaires
6. other available means

The submission of views and proposals shall be an on-going process and at a minimum during the following stages:

1. the planning process
2. the application process
3. the implementation process

Responses to all submissions shall be in a timely fashion and shall not exceed a period of fifteen (15) days after the voicing or filing of an inquiry.

E. Complaints:

All complaints regarding any aspect of the Community Development Block Grant Program, HOME Investment Partnership Program and Section 108 Loan Guarantee Program shall be provided in a timely, substantive written response within fifteen (15) working days after the voicing or filing of a complaint.

F. Technical Assistance:

The staff of the City of Wheeling's Department of Economic and Community Development shall provide technical assistance to groups which are representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Five Year Consolidated Plan.

The City's staff will assist these groups to prepare their proposals and will provide assistance in preparing cost estimates for projects proposed by low- and moderate income groups.

G. Adequate Information:

The City shall provide full public access to the CDBG and HOME programs' information and affirmative efforts to provide adequate information to citizens, especially those who are low- and moderate-income, and those who are residing in predominantly low- and moderate-income neighborhoods or slum or blighted neighborhoods. Information shall be provided on the Community Development Block Grant, HOME Investment Partnership, and Section 108 Loan Guarantee Programs, including at a minimum the following:

1. At the time when the City begins its Community Development Block Grant Program, HOME, and Section 108 Loan planning process, including:
 - a. total amount of funds available, including program income
 - b. the range of activities that are eligible or ineligible, including the estimated amount that will benefit persons who are low- and moderate-income.
 - c. plans to minimize displacement and to assist any persons displaced, specifying the types and levels of assistance the City will make available to persons displaced, even if the City anticipates no displacement. The Five Year Consolidated Plan must state when and how the City will make this information available.
 - d. the process that will be followed in developing and approving the projects or programs.
 - e. roles and objectives of the Citizen Participation Program
 - f. summary of important program requirements.
2. Upon request, copies of all materials relating to the CDBG and HOME Programs will be made available to any person and/or group for the cost of copying only, particularly documentation concerning the following:
 - a. all mailing, promotional material and news releases
 - b. key documents, including all prior applications, letters of approval, performance and program evaluation reports, and any other applications, proposed or approved, or reports required by HUD
 - c. copies of the CDBG and HOME regulations

- d. information on contracting and purchasing procedures, environmental policies, fair housing, equal opportunity, relocation provisions, A-95 review process, affirmative action and any other requirements or regulations relating to the CDBG and HOME Programs.

H. Meetings:

All meetings shall be held in a timely fashion and shall be accessible to all segments of the city's population including accommodations for persons with disabilities. These meetings shall be held at a time and place that is convenient and accessible to potential or actual beneficiaries.

1. Public hearings shall be held on a continuous basis, at least two (2) times per year at different stages of the program year for the purpose of obtaining citizen views on the development of needs, the review of proposed activities and review of program performance. At least one public hearing must be held before the proposed Five Year Consolidated Plan, Annual Action Plan, and Section 108 Loan Guarantee Application is published for comments.
2. Public hearing notices shall be published at least two weeks prior to hearing date and shall be advertised as a Class 2 block ad, via the local newspaper of general circulation in the area.

I. Public Notice:

1. A notice that the proposed draft Five Year Consolidated Plan and/or Annual Action Plans are on public display will be published in the local newspaper of general circulation in the city for a period of not less than thirty (30) days in order to receive citizen comments prior to approval by City Council.
2. An electronic copy of the proposed draft Five Year Consolidated Plan and/or Annual Action Plans shall be placed on the City's web site for viewing and comments.
3. Copies of the proposed plan will be available at the following locations:
 - a. Offices of the City of Wheeling's Department of Economic and Community Development, Room 305, City County Building, 1500 Chapline Street, Wheeling, WV 26003
 - b. The Ohio County Public Library, 52 Sixteenth Street, Wheeling, WV 26003
3. The summary of the proposed plan will describe the contents and purpose and include a list of the locations where copies of the entire proposed Five Year Consolidated Plan and/or Annual Action

Plans may be examined. In addition, a reasonable number of free copies will be made available to citizens or groups that request it.

4. The City of Wheeling will consider any comments or views of citizens received in writing or orally at the public hearings, in preparing the final Five Year Consolidated Plan and Annual Action Plans. A summary of all comments, including those comments not accepted and the reason therefore, shall be attached to the final Five Year Consolidated Plan and/or Annual Action Plans.

J. Continuing Activities:

All continuing activities shall be subject to the citizen participation process as herein outlined.

K. Copies of Substantial Amendments to the Five Year Consolidated Plan, Annual Action Plans and Consolidated Annual Performance and Evaluation Reports will be made available for reading upon request to the City of Wheeling's Department of Economic and Community Development, and will be placed on public display at the offices of the Department of Economic and Community Development, and the Ohio County Public Library.

L. Access to Records:

The City shall provide full and timely disclosures of its program records. The City will provide these disclosures within fifteen (15) days of a written request. Additionally, all records and documentation concerning the Community Development Block Grant and HOME Programs shall be made available during normal business hours of the City.

M. Substantial Amendments to the Five Year Consolidated Plan and Annual Action Plans:

1. Definition:

A substantial amendment to the Five Year Consolidated Plan and Annual Action Plans is:

- a. a change in its allocation priorities or a change in the method of distribution of funds
- b. proposing to undertake an activity, using funds from any program covered by the Five Year Consolidated Plan (including program income), not previously described in the annual action plan; or
- c. a change in the purpose, scope, location or beneficiaries of a previously approved activity.

2. Criteria:

The criteria used to determine what constitutes an amendment are based on the following:

- a. Purpose - the original purpose for which the activity was selected has changed, including the category of the National Objective selected.
- b. Scope - the scope of the project activity has increased which changes the cost of the activity by more than 50% of the total original budgeted dollar amount for that activity.
- c. Location - the location of the project activity is different from that originally proposed, or the size of the project service area has increased or decreased by 25% in size, or the location of the activity had to be relocated to another area.
- d. Beneficiaries - the number of beneficiaries has changed and the activity no longer serves at least 51% low- and moderate-income persons.

3. Procedure:

A description of the substantial amendment to the Five Year Consolidated Plan or the Annual Action Plans will be published in the local newspaper of general circulation. A period of no less than thirty (30) days will be provided to receive citizen comments prior to the approval of the amendment by the City Council. The date, time, and place of the public hearing shall be listed.

- a. The City will consider any comments or views of citizens received in writing or orally at the public hearing, in preparing the substantial amendment of the Five Year Consolidated Plan or Annual Action Plans. A summary of any comments or views, as well as a summary of any comments or views not accepted and reasons therefore, shall be attached to the substantial amendment of the Five Year Consolidated Plan and Annual Action Plans.
- b. The substantial amendment will be presented to the City of Wheeling's City Council at a public meeting. City Council will review and approve any substantial amendment.
- c. The City shall submit to HUD a description of the adopted substantial amendment. A letter transmitting such description shall be signed by the City Manager of the City of Wheeling or his designee.

If any one of the above criteria applies then a substantial amendment to a project activity has occurred.

N. Emergency Activities:

During the course of implementation of the CDBG Program, if the City makes an emergency declaration as a result of a situation or condition that has arisen through no fault of the City, immediate action or remediation may be taken. If CDBG funds are available to ameliorate or remediate that situation or condition, the City may proceed with corrective action during the 30 day comment period. The City must publish a notice concurrently, in the newspaper of general circulation in the area, and allow citizens to respond to the expenditure of CDBG funds during the 30 day comment period.

O. Consolidated Annual Performance and Evaluation Report (CAPER):

A notice will be published in the local newspaper of general circulation informing the public of the availability of the City's CDBG and HOME Consolidated Annual Performance and Evaluation Report and providing citizens with the opportunity to comment on the CAPER. A period of no less than 15 days will be provided to receive citizen comments prior to adoption by the City Council.

The City will consider any comments or views of citizens, received in writing or orally, concerning its Consolidated Annual Performance and Evaluation Report. A summary of these comments or views shall be attached to the CAPER.

P. Non-English Speaking Residents:

If the City of Wheeling anticipates that a significant number of non-English speaking residents will attend a public hearing, then arrangements will be made to have a translator, who is fluent in the language of non-English speaking residents, available at the public hearing. The City will hire someone to attend the public hearing and translate for the non-English speaking population. Also, the minutes of the hearing will be transcribed, when applicable, for the benefit of non-English speaking persons.

Q. Citizens Comment on the Citizens Participation Plan:

The City of Wheeling will provide citizens with the opportunity to comment on this Citizen Participation Plan. Copies of this plan will be on display at the Offices of the Department of Economic and Community Development, and the Ohio County Public Library. A public notice will be published in the local newspaper of general circulation in the City for a period of two

weeks prior to the adoption of the Citizens Participation Plan by the City Council in order for Citizens to comment on the plan. Copies of the Citizens Participation Plan will be made available upon request, in a format accessible to persons with disabilities. Substantial amendments to this plan will follow the same procedure as the adoption of the original plan.

R. Declaration of an Emergency:

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of West Virginia, and regulatory flexibility is permitted by HUD, the City of Wheeling will follow the following process concerning public hearings and public display of plans when necessary for public health reasons. These Emergency procedures will apply to Consolidated Plan/Annual Action Plan amendments and initial Plan submissions, as permitted through a regulatory waiver authority or programmatic flexibility:

- If the City is unable to hold open public hearings in person, the City will be allowed instead, to hold virtual public hearings through conference calls or an online video conference call platform, as long as the public is able to provide comments during the virtual public hearing.
- If the City is not able to physically place the plans on public display at the locations referenced in the Citizen Participation Plan, the City will put the plans on the City's website (<https://www.wheelingwv.gov>) and will also email copies of the plans to any person who requests a copy of the plans via an email request.
- If the City Council is unable to conduct an open public forum type meeting, the City then can approve the plans at a virtual City Council meeting, since an in-person Council meeting will not be held because of the Declaration of an Emergency.
- HUD has waived the public comment period for substantial amendments to the Consolidated Plan/Annual Action Plan from thirty (30) to five (5) days.
- HUD has waived the public comment period for the FY 2020 Consolidated Plan/Annual Action Plan submission from thirty (30) to five (5) days.
- All other requirements relative to the City's Citizen Participation Plan for Consolidated Plans remain in effect, including the consultation requirements, as required by 24 CFR 91.105.

THIS CITIZEN PARTICIPATION PLAN WAS ADOPTED BY THE CITY COUNCIL OF THE CITY OF WHEELING, OHIO COUNTY, WEST VIRGINIA AT ITS REGULARLY SCHEDULED MEETING HELD ON THE 19TH DAY OF MAY, 2020.

ATTEST:

CITY OF WHEELING, WV

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