

**CITIZEN PARTICIPATION PLAN**  
**Lakewood, OH**  
**(amended April 2020 to reflect CARES Act flexibilities)**

This Citizen Participation Plan, established in accordance with the Housing and Community Development Act of 1974, as amended, and 24 CFR 91.105, provides for and encourages citizen participation in the City of Lakewood's annual federal funding allocation process with particular emphasis on informing and engaging low-moderate income residents.

**I. CITY COUNCIL**

Lakewood's Citizens Advisory Committee (CAC) forwards its federal funding allocation recommendations to Lakewood City Council. City Council considers these recommendations for inclusion in the City's HUD Annual Action Plan, which serves as Lakewood's federal funding application for the coming fiscal year and authorizes the Mayor to submit the Action Plan on City's behalf.

All City Council meetings are open to the public and properly noticed in accordance with the City's Charter.

**II. CITIZENS ADVISORY COMMITTEE**

**A. Composition**

Lakewood's Citizens Advisory Committee (CAC) is comprised of nine members appointed by the Mayor and eight members appointed by City Council. Mayoral appointees can serve up to two two-year terms while City Council appointees can serve up to three one-year terms.

The CAC reviews funding requests submitted by city departments/divisions and not-for-profit agencies then makes recommendations to City Council regarding the allocation of federal resources. Applicants defend written proposals during a 15-minute oral presentation before the Committee regarding how proposed uses advance Consolidated Plan and community goals and comply with applicable regulations and eligibility requirements.

**B. Meetings**

**1. Generally**

All meetings of the Citizens Advisory Committee are open to the public and held in locations accessible to handicapped individuals. The CAC elects a Chairperson at its initial meeting who organizes and leads all future meetings. At the conclusion of each CAC session the public is provided with an opportunity to comment on the proceedings. All Citizens Advisory Committee materials are accessible to the public via the City's website and by written request to Lakewood's Department of Planning & Development .

**2. Regular Meetings**

CAC sessions, which typically occur during the month of October, include an organizational meeting, two public hearings, and applicant presentation sessions during which each applicant conducts a 15-minute presentation describing their proposal after which Committee members may pose questions and request additional information. An Orientation Session for new members is conducted prior to the CAC's first session.

### **3. Public Hearings**

Public hearings provide an opportunity for citizens to comment on Lakewood's community development needs and the allocation of HUD funds in the coming year. The first Public Hearing, held during first CAC session, provides residents with an opportunity to ask questions and provide feedback regarding on the City's Consolidated Plan goal areas and community/economic development needs early in the CAC process. The second Public Hearing, held during the CAC's final session, provides residents with an opportunity to ask questions and provide feedback regarding specific programs and funding allocations recommendations.

If necessary, the Committee convenes for additional meetings outside of this timeframe to address special issues. Special CAC sessions are typically concern substantial amendments to previously approved plans. However, special meetings can be convened on any topic considered outside the scope of the issues normally covered during the regular meeting schedule.

During declared emergencies the City can satisfy public hearing requirements by providing reasonable advance notice via the City's website and conducting virtual (vs. in-person) public hearings if:

1. national/local health authorities recommend social distancing and limiting public gatherings for public health reasons, and;
2. virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

### **4. Notice Procedures**

A notice regarding all CAC meetings and hearings will be posted to the City's website at least 24 hours prior to the event.

## **IV. PROGRAM PROPOSALS**

All applications for HUD funds are presented to the Citizens Advisory Committee on a standardized application prepared by the Department of Planning & Development which also provides technical assistance regarding the application process upon request.

## **V. SUBSTANTIAL CHANGES**

The CAC reviews and approves all proposed amendments to previously approved plans during a public hearing convened for this purpose. Refer to Section 3 above for the City's modified public hearing requirements during declared emergencies.

Please refer to Attachment 1 to Exhibit A regarding the City's Substantial Change Policy for additional information.

## **VI. GRANTEE PERFORMANCE REPORT**

Through an advertisement in a newspaper of general circulation within the City, as defined by ordinance, citizens are notified the City's

A notice regarding the issuance of Lakewood's HUD Consolidated Annual Performance & Evaluation Report for a 15-day public review and comment period is posted to the City's website at least 24 hours prior the commencement of said review period.

## **VII. GRIEVANCE PROCEDURE**

Any citizen may submit in writing a complaint or grievance regarding the uses of HUD funds. Any complaint or grievance received by the Department of Planning & Development will be responded to in writing within fifteen (15) working days to the individual or group filing the complaint or grievance.

## **VIII. NEEDS OF NON-ENGLISH-SPEAKING RESIDENTS**

The City of Lakewood will provide a translator for any public meeting or regular meeting of the Citizens Advisory Committee if the City anticipates five (5) or more non-English speaking residents understanding the same language will attend a meeting of the Citizens Advisory Committee or if a written request by an organization representing non-English speaking residents is received five (5) working days prior to the scheduled meeting.

## **Attachment**

## **Exhibit A – Attachment 1 SUBSTANTIAL CHANGE POLICY**

Federal Regulations require the City of Lakewood, as a recipient of CDBG funds, to prepare and make public a "final statement" as a part of the city's annual CDBG application. The "final statement" contains the city's community development objectives and proposed uses of CDBG funds. The "final statement" is prepared by the Department of Planning & Development following the approval by City Council of the annual CDBG budget.

Federal Regulations also require the city to formally amend the final statement when adding or deleting activities during the grant year. The city is also required to amend the "final statement" when the city wishes to "substantially change" the purpose, scope, location or beneficiaries of an activity contained in the "final statement." These regulations require the city to develop and make public its criteria for what constitutes a "substantial change".

For the purposes of this policy, the Department of Planning & Development has adopted the following as its criteria for determining when a "substantial change" has occurred.

### *Change in Purpose*

The proposed uses section of the final statement describes the reasons CDBG funds were awarded by the city. It is expected that virtually all the allocated CDBG funds will be spent in conformance with the final statement. A "substantial change" will have occurred when more than 10% of the grant funds for an individual activity are used for a purpose not contained in the final statement. A "substantial change" will not have occurred when the recipient is able to accomplish the goals set out in the final statement and their CDBG application for less money than originally budgeted, if these grant funds are used to accomplish another activity contained within the final statement.

### *Change in Scope*

The final statement often contains the extent of the activity to be undertaken with CDBG funds. However, often the subrecipient is unable to accomplish the project to the extent it originally thought due to external conditions. Therefore, a "substantial change" will have occurred only when the project fails to meet 1/2 of the measurable objectives contained in the final statement. An increase in the number of beneficiaries will not constitute a substantial change solely due to the percentage or numerical increase in the number of beneficiaries assisted by a CDBG subrecipient.

### *Change in Location*

Locations are rarely contained in the final statement, as most CDBG funds are spent on a city-wide basis. A "substantial change" in location will have occurred when the location contained in the final statement is an integral part of the reason CDBG funds were awarded. Locations contained in the final statement which are incidental to the purpose for which CDBG funds were awarded will not be considered a "substantial change".

### *Change in Beneficiaries*

The final statement generally classifies types of beneficiaries. For example, homeowners, elderly, or abused children. A "substantial change" will have occurred when 10% or more of the beneficiaries assisted in a specific activity are outside the general classification contained within the final statement.