



VILLAGE OF OAK PARK CITIZEN PARTICIPATION PLAN

COMMUNITY DEVELOPMENT BLOCK GRANT, EMERGENCY SOLUTIONS GRANT, HOME & SECTION 108 LOAN GUARANTEE PROGRAMS AND ASSESSMENT OF FAIR HOUSING

1. Overview

The Village of Oak Park receives Federal Community Development Block Grant (CDBG) and Emergency Solutions Grant (ESG) funds annually. Each grant has different regulations, program requirements, and target populations. The two grants are awarded based on a formula that takes into account several factors, including low- and moderate-income population and age of housing stock.

The Consolidated Plan is intended to establish a unified vision of housing and community development strategies for the two federal grants received by the Village, as well as the Oak Park Section 108 Loan Guarantee Program. As part of the Cook County HOME Program Consortium, there is a possibility that Oak Park could also receive future HOME funds. The Consolidated Plan is designed to assist the community in meeting the goals intended by Congress to provide decent housing, a suitable living environment, and expand economic opportunities for low-income or disabled persons, and the Annual Action Plan describes the proposed project for each program year. Finally, as a grantee of HUD CDBG and ESG funds, the Village must complete an Assessment of Fair Housing.

2. Citizen Participation

The Village shall follow a detailed citizen participation plan that addresses the following issues: participation, access to meetings, access to information, access to records, publishing the plan, public hearings, notice of hearings, public comments, technical assistance, complaints, and amendments.

a) Encouragement of Citizen Participation in CDBG/ESG/Section 108 Loan Guarantee Program/AFH Planning & Activities: All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the:

- Five-Year Consolidated Plan;
- Annual One-Year Action Plan;
- Substantial Amendments to the One-Year Action Plan and/or Five-Year Plan;
- Citizen Participation Plan;
- Assessment of Fair Housing (AFH); and
- Consolidated Annual Performance and Evaluation Report (CAPER)

All meetings are open to the public and are scheduled at times and locations convenient to potential and actual beneficiaries with accommodations for persons with disabilities and with assistance for non-English speaking persons available, as needed. Those wishing to be regularly informed of meetings/activities can be added to the program mailing and email lists.

b) Public Review/Comment on the Adoption of/Amendments to Citizen Participation Plan:

- **Public Notice Requirement & Comment Period:** A public hearing for the adoption of/amendments to the Citizen Participation Plan is advertised in the *Wednesday Journal* or *Oak Leaves* at least 15 days before the date of the hearing. The public hearing notice shall include a summary of the contents and purpose of the Citizen Participation Plan, and shall include a list of the locations where copies of the entire proposed plan may be examined.
- **Public Review:** During the 15-day public comment period, copies of the proposed Citizen Participation Plan will be made available for public review at the Village of Oak Park Neighborhood Services Division Office and at all public library branches in Oak Park listed below:

<u>Main Library</u>	<u>Dole Branch</u>	<u>Maze Branch</u>
834 Lake Street Oak Park, IL 60301	255 Augusta Street Oak Park, IL 60302	845 Gunderson Avenue Oak Park, IL 60304

Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. Note that during the 2020 COVID-19 pandemic, there will be a 5 day comment period, with no public hearing.

- **Public Comments:** The public may comment on the proposed Citizen Participation Plan in writing or at the public hearing. Written comments must be directed to the Grants Supervisor, Village of Oak Park Development Customer Services Department, 123 Madison Street, Oak Park, Illinois. 60302. The Village shall consider any comments or views received in preparing the Citizen Participation Plan. Note that during the 2020 COVID-19 pandemic, comments shall be sent to grants@oak-park.us.
- **Public Hearing Location:** The public hearing shall be held in the Village of Oak Park, Room 215, 123 Madison Street, Oak Park, Illinois 60302. Note that for the amendment proposed during the 2020 COVID-19 pandemic, there will be no public hearing

c) Final Policy/Implementation Authority: The plan recognizes that as the elected

governing body of the Village of Oak Park, the Board of Trustees has the ultimate responsibility and authority for the implementation of the Consolidated Plan, CDBG, ESG and HOME activities, Section 108 Loan Guarantee Program projects, and the AFH.

3. Public Meeting Notice and the Corresponding Public Comment Period Requirements:

Notices of public meetings, public hearings, substantial amendments, notifications of 15 or 30-day comment periods (or crisis-related 5-day comment periods), the notification of the Village of Oak Park’s proposed and actual use of CDBG/ESG funds, Section 108 Loan Guarantee Program funds, and HOME Program funds; and the content of the AFH, will be published in the *Wednesday Journal* or the *Oak Leaves*.

To further encourage the attendance and participation of persons of low- and moderate-income, notices will also be sent to:

- The Oak Park Housing Authority;
- Public and private agencies that provide housing, health, and social services, including those that provide services to children, elderly, disabled, HIV/AIDS, and the homeless;
- Organizations representing non-English speaking citizens in Oak Park; and
- Other interested parties on the Oak Park grants mailing list.

4. Access to Records

The Village of Oak Park shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records of the CDBG, ESG HOME, Section 108 Programs, the AFH, during the preceding five years.

Copies of the adopted Consolidated Plan, adopted substantial amendments, and annual performance reports, as well as information regarding use of funds and other program and assessment information will be maintained by the Village’s Neighborhood Services Division staff.

The public may access these materials by contacting the Grants Supervisor, Village of Oak Park Development Customer Services Department, Neighborhood Services Division, 123 Madison Street, Oak Park, Illinois 60302, voice (708) 358-5416 (TTY is 711), 8:30 a.m. to 5:00 p.m., Monday through Friday. Reasonable accommodation for persons with disabilities and non-English speakers will be made upon request.

5. Development of the Annual Action Plan (and/or Five Year Consolidated Plan)

- a) **Notice of Availability of CDBG and ESG funds:** In January the Village of Oak Park publishes a Notice of Availability of CDBG and ESG funds. Through this notice, Oak Park will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance Oak Park expects to receive (including grant funds and program income) and the range of activities that may be undertaken. The Notice also informs the public of the time and place of the CDBG and ESG workshop described more fully in Section 6 of this Plan.

- b) **Annual Action Plan (and/or Five Year Consolidated Plan) - Public Hearing & Comment Period:** The Village of Oak Park shall provide for a public review process that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine the proposed Action/Consolidated Plan and to submit comments upon the proposed Action/Consolidated Plan.
- **Public Notice Requirement & Comment Period:** The public hearing is advertised in the *Wednesday Journal* or *Oak Leaves* at least 30 days before the date of the hearing. The public hearing notice shall include a summary of the contents and purpose of the Action/Consolidated Plan, and shall include a list of the locations where copies of the entire proposed plan may be examined.
 - **Public Review:** During the 30-day public comment period, copies of the proposed Action/Consolidated Plan will be made available for public review at the Village of Oak Park Office and at all public library branches in Oak Park. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. Oak Park will also have a copy of the Plan available on its website for viewing or download at <http://www.oak-park.us>.
 - **Public Comments:** The public may comment on the Action/Consolidated Plan in writing or at the public hearing. Written comments must be directed to the Grants Supervisor, Village of Oak Park Development Customer Services Department, Neighborhood Services Division, 123 Madison Street, Oak Park, Illinois 60302. Oak Park shall consider any comments or views received in preparing the Action/Consolidated Plan. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Action/Consolidated plan.
 - **Public Hearing Location:** The public hearing(s) shall be held in the Village of Oak Park Village Hall, Room 215, 123 Madison Street, Oak Park, Illinois 60302.

Note that during the COVID-19 pandemic, the comment period will be 5 days and there will be a virtual public hearing unless HUD waives the need for a public hearing entirely.

6. Competitive Fund Allocation Process

The Village utilizes separate competitive fund allocation processes to recommend CDBG and ESG projects for funding to the Board of Trustees. The public is notified about the availability of the funding applications by newspaper advertising and direct emails and mailings to new and past recipients. The process also includes an application workshop and technical assistance.

CDBG & ESG Funding Workshops: In January, the Village of Oak Park publishes a Notice of Availability of CDBG and ESG funds. The notice informs the public of the estimated amount of CDBG ESG grant funds (and Section 108 loan funds) available for the upcoming program year. The notice also informs the public of the time and place of the mandatory CDBG and ESG application workshop. Workshops are conducted to assist applicants who may apply to Oak Park for CDBG, ESG and/or Section 108 funds. At the workshops, program objectives, eligible activities, eligible applicants, funding policies, application forms and the proposal evaluation and selection process are discussed.

Department staff will also meet with applicants individually (upon request), to discuss proposal development and to provide assistance. Each workshop participant receives a copy of the annual Request for Proposals, Proposal Forms and Instructions, and the Village funding policies. The locations of the workshops are handicapped accessible.

Project Selection: The Community Development Citizens Advisory Committee (CDCAC) selects CDBG and ESG projects based on several qualifying factors, including priority needs, cost per benefit, project feasibility and more. The CDCAC consists of up to nine Oak Park residents serving multi-year terms and is attended by a Village Board Trustee liaison. The projects selected are recommended to the full Village Board of Trustees for final approval and submission to HUD. CDCAC meetings are regularly scheduled for two months of activity. The CDCAC is not involved with Section 108 Loan Guarantee Program or HOME Program funds and may not be involved with special grant allocations received by the Village during a health or other crisis such as the COVID-19 pandemic in 2020.

7. Development of Section 108 Guaranteed Loan Program/Loan Fund Projects

- a) **Notice of Proposed Section 108 Guaranteed Loan:** When loans are sought by businesses, the Village of Oak Park publishes a Notice of Proposed Section 108 Guaranteed Loan project. Through this notice, Oak Park will make available to citizens, public agencies, and other interested parties information that includes the amount of money Oak Park expects to lend out, the range of activities, and the type of project that may be undertaken with guaranteed loan funds.
- b) **Proposed Section 108 Guaranteed Loan Program and Projects - Public Hearing & Comment Period:** The Village of Oak Park shall provide for a public review process that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine the Section 108 Guaranteed Loan Program and then each proposed Section 108 loan and to submit comments on the program and each proposed project.
 - **Public Notice Requirement & Comment Period:** The public hearing is advertised in the *Wednesday Journal* or *Oak Leaves* at least 30 days before the date that the proposed guaranteed loan project will be approved. The public hearing notice shall include a summary of the details of the loan project, and shall include a list of the locations where copies of the entire proposed loan project may be examined.
 - **Public Review:** During the 30-day public comment period, copies of the proposed loan project will be made available for public review at the Village of Oak Park Neighborhood Services Division Office and at all public library branches in Oak Park. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. Oak Park will also have a copy of the proposed loan project available on its website for viewing or download at <http://www.oak-park.us>.
 - **Public Comments:** The public may comment on the proposed guaranteed loan project in writing or at the public hearing. Written comments must be directed to the Grants Supervisor, Village of Oak Park Development Customer Services Department, Neighborhood Services Division, 123 Madison Street, Oak Park,

Illinois 60302. Oak Park shall consider any comments or views received on the proposed guaranteed loan project. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final guaranteed loan project summary.

- **Public Hearing Location:** The public hearings shall be held in the Village of Oak Park Village Hall, Room 215, 123 Madison Street, Oak Park, Illinois 60302.

Project Selection: With Section 108 Program funds, the Loan Review Committee, with assistance from the professional underwriting consultant, and with public notice, will determine which entities are eligible to receive Section 108 loans and at what specific terms. The Village of Oak Park Development Customer Services Department, Neighborhood Services Division, will manage the Section 108 loan fund.

8. Program Performance Review

Public Review: Public notice of the availability of the Consolidated Annual Performance and Evaluation Report (CAPER – the annual performance review document) for review and public comment is advertised in the *Wednesday Journal* or *Oak Leaves*. During the 15 day public comment period, copies of the CAPER will be made available for public review at the Village of Oak Park Neighborhood Services Division Office, on the Village of Oak Park website, and at all public library branches in Oak Park. Reasonable accommodations will be made for non-English speakers and for people with disabilities.

Public Comments: The public may comment on the CAPER in writing to the Board of Trustees. Written comments must be directed to the Grants Supervisor, Village of Oak Park Development Customer Services Department, Neighborhood Services Division, 123 Madison Street, Oak Park, Illinois 60302. The Village shall consider any comments or views received in preparing the CAPER. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final CAPER.

9. Assessment of Fair Housing (AFH)

The U.S. Department of Housing and Urban Development (HUD) requires federal grant entitlement communities such as Oak Park to produce an Assessment of Fair Housing (AFH), which replaced the previous assessment, called the Analysis of Impediments to Fair Housing Choice. HUD encouraged local entities to collaborate on a regional AFH. In developing the AFH, reasonable accommodations will be made for non-English speaking persons and for people with disabilities, and other components of this citizen participation plan will be followed.

AFH Development: The Village will follow the processes and procedures described below in the development of its AFH.

a.) HUD-approved Data for Public Review.

As soon as practicable, the Village will make available to the public (residents, public agencies and other interested parties) the HUD-provided data and other supplemental information that the Village plans to incorporate into its AFH. The Village will make this data available at the start of the public participation process, or as soon as feasible after.

b.) Stakeholder Consultation and Citizen Outreach.

In developing the AFH, as well as the Consolidated Plan, the Village will consult with local public housing authorities, other public and private agencies that provide assisted housing, health services, social services (e.g., for children, seniors, persons with disabilities, persons with HIV/AIDS and their families, homeless persons), community- and regionally-based organizations that represent protected class members, organizations that enforce fair housing laws, neighboring municipalities, regional governmental agencies, and local governmental agencies, including those with metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

c.) Public Hearing.

To obtain the views of the public on AFH-related data and affirmatively furthering fair housing in the Village's housing and community development programs, the Village will conduct at least one public hearing before the draft AFH is published for comment.

d.) Public Display and Comment Period.

The draft AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice will be placed in the *Wednesday Journal* or *Oak Leaves* and will include a brief summary of the content and purpose of the draft AFH, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by the Village Board, and the anticipated submission date to HUD. In addition, the Village will make available a reasonable number of free copies of the proposed document to residents and groups that request them. Through this process, the Village will give all persons and groups listed above a reasonable opportunity to examine its content and to submit comments.

e.) Comments Received on the Draft AFH.

The Village Contact Person or his/her designee will accept all public comments during the 30-day public display and comment period. The Village will consider any public comments or views received in writing or orally at the public hearings in preparing the final AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AFH for submission to HUD.

Revisions to the Assessment of Fair Housing (AFH): The Village shall follow the following procedure to amend its AFH, as needed.

a.) Revision Considerations. The Village will amend its AFH previously accepted by HUD under the following circumstances:

1. A material change occurs. A material change is a change in circumstances in the Village 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 Assessment no longer reflect actual circumstances. A material change includes but is not limited to:
 - A Presidentially-declared disaster;
 - Significant demographic changes;

- Substantial policy changes such as those related to zoning, housing plans or development plans or policies;
 - New significant contributing factors in the Village; and
 - Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders.
2. Upon HUD's written notification specifying a material change that requires the revision.

b.) Public Display and Comment Period.

The draft amended AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed Amended AFH can be examined, how comments will be accepted, when the document will be considered for action by the Village Board, and the anticipated submission date to HUD.

In addition, the Village will make available a reasonable number of free copies of the proposed Amended AFH to residents and groups that request it.

c.) Comments Received on the Proposed Amended AFH.

The Village Contact Person, or his/her designee, will accept written comments, during the 30-day public display and comment period. The Village will consider any comments or views of Village residents received in writing, or orally at public hearings, in preparing the final Amended AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended AFH for submission to HUD.

d.) Submission to HUD.

The final Amended AFH will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

10. Non-English Speaking and Persons with Disabilities

Public Hearing/Meeting Accommodation. All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the Village will provide translators at public hearings and meetings.

People requiring auxiliary aids or special arrangements in order to participate in hearings should call (708) 358-5416 (TTY is 711) at least two days prior to the scheduled hearing.

CDBG/ESG/HOME/Section 108/AFH Document & Materials Review Accommodations. Reasonable accommodations will be provided to disabled persons or non-English speaking persons needing assistance in reviewing CDBG/ESG/Section 108 program materials or documents.

People requiring auxiliary aids or special arrangements in order to participate in hearings should call (708) 358-5416 (TTY is 711) at least two days prior to the scheduled hearing.

11. Technical Assistance

The Village of Oak Park Neighborhood Services Division will provide technical assistance to groups representing low- and moderate-income persons that request such assistance to develop an application to the Village or HUD, and also to potential Section 108 Guaranteed Loan applicants. Such technical assistance may include an explanation of:

- a) Program rules and regulations;
- b) Requirements for implementing and managing projects;
- c) Project eligibility and national objectives requirements; and
- d) The evaluation process used by the CDCAC and Board of Trustees for grants, and the process used by the loan committee and/or underwriting consultant for loans.

The Village's provision of technical assistance does not include the preparation of grant or loan applications for individuals, organizations or businesses. The Village's provision of technical assistance is limited by funds and staff availability.

12. Procedures for Complaints or Grievances

Complaints, inquiries, and grievances shall be submitted in writing to the Grants Supervisor, Village of Oak Park Development Customer Services Department, Neighborhood Services Division, 123 Madison Street, Oak Park, Illinois 60302. A written response shall be provided to the complaining or aggrieved party within 15 working days of the date of receipt of the written complaint or grievance.

13. Program Year Schedule, CDBG & ESG (Note that Section 108 is ongoing throughout the year)

January	Notice of Availability of CDBG/ESG Funds Published.
February	Applications available for next funding round of CDBG and ESG funds/Mandatory Grants Application Workshop held.
March	CDBG and ESG applications due.
May	CDBG and ESG projects recommended by CDCAC for funding.
July	Public Hearing on Action Plan/Consolidated Plan (30-day comment period prior to hearing).
July	Public Hearing and Adoption of Action Plan/Consolidated Plan by Board of Trustees.
October	Start of program year

The schedule is subject to change during times of crisis such as the COVID-19 pandemic.

14. Criteria & Procedures for Amendments & Substantial Amendments to Action Plans and/or the Five Year Consolidated Plan

A "substantial amendment" is an amendment to the Consolidated Plan and/or Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, The Village of Oak Park will provide citizens with a 30-day notice (advertised in the

Wednesday Journal or *Oak Leaves*) of an opportunity to comment whenever a substantial amendment is being proposed for the Village of Oak Park CDBG, ESG and HOME programs, the Section 108 Loan Guarantee program, or the AFH. Note that for the 2020 COVID-19 pandemic, HUD is allowing the Village to shorten the 30 day comment period to a 5 day comment period, while also allowing the 5 day period to run concurrently for comments on two public notice processes; for example, an action plan amendment and a citizens participation plan amendment. The Village of Oak Park shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted (that is, comments that do not result in changes) shall be included in this summary, along with the reason they were not accepted.

A substantial amendment is defined as:

- a) Changes to any of the goals, policies, or procedures identified in the Consolidated Plan;
- b) Changes to the CDBG, ESG or HOME budget (or Section 108 loan amount) for a project by an amount in excess of twenty-five percent (25%) or \$5,000, whichever is greater;
- c) Changes in the purpose, scope, beneficiaries, or location of the project;
- d) A change in allocation priorities or method of distribution of funds;
- e) A change in the source of funding, from one source to any other source (including program income) covered by the consolidated plan; or
- f) Cancellation of an existing project or adding a new project.

Changes that are not considered substantial amendments:

- a) Changes to the CDBG, ESG or HOME budget (or Section 108 loan amount) for a project by an amount that is less than 25% or \$5,000, whichever is greater;
- b) Consolidated Plan data updates: Consolidated Plan data updates such as census data, income limits, and fair market rents, HOME high and low market rents, Home subsidy limits, and similar types of data shall not be considered a substantial amendment;
- c) Minor change in project location: A minor change in location on a specific property is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same;
- d) Project Budget Line Item change: The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering) does not constitute a substantial change;
- e) Modifications to a program or project or new activities developed in response to the COVID-19 public health emergency or other local, state or federal emergency or disaster declaration. If HUD mandates specific public participation requirements related to an emergency or disaster event, then those guidelines will be followed.

A regular amendment will not be advertised in the newspaper, but will be posted on the Grants page of the Village's website, calling for public comment.

15. Minimizing Displacement

Consistent with the goals and objectives of activities assisted under the Act, the

Village of Oak Park Community Development Block Grant and Emergency Solutions Grant Programs, and the Section 108 Program, will take the following steps (where applicable) to minimize the displacement of people, businesses, and non-profits:

- a) Encourage project sponsors to plan or stage projects to minimize and/or prevent the adverse impacts of displacement;
- b) Provide advisory services as may be necessary to determine relocation needs, or other assistance for which displaced persons may be eligible;
- c) Coordinate code enforcement with rehabilitation and housing assistance programs; and
- d) Stage the rehabilitation of apartment units to allow tenants to remain in the building/complex during and after rehabilitation by working with empty units or buildings first.

Any residential tenant who will be permanently and involuntarily displaced shall be entitled to the following services and benefits:

- a) Timely Information. The tenant will be contacted and provided timely information that fully explains the reason for the displacement and the relocation assistance available;
- b) Advisory Services. The tenant will be provided appropriate advisory services necessary to minimize hardships in adjusting to the relocation;
- c) Advance Notice. Unless there is an urgent need for the property (e.g., substantial danger to a person's health or safety) or the tenant is evicted for cause, the tenant shall be given at least 90 days' advance notice of the earliest possible date which they must vacate the property;
- d) Replacement Housing Assistance. Replacement housing assistance is available to both renters and owners in the form of rental assistance or purchase assistance. The replacement assistance is based on a number of factors as provided in the Uniform Relocation Act and its regulations at 24 CFR Part 24; and
- e) Moving Expenses. The tenant will be reimbursed for reasonable, documented costs of his/her moving and related expenses or the tenant may elect to receive a fixed payment for moving and related expenses.