



**City of Cincinnati
2020 – 2024 Consolidated Plan
Public Participation Plan**

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Public Participation Plan**

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CITY OF CINCINNATI PUBLIC PARTICIPATION PLAN

I. PURPOSE AND INTENT

A. The City of Cincinnati (City) is an entitlement jurisdiction that receives federal funds from the United States Department of Housing and Urban Development (HUD) to support local community development and affordable housing activities. The federal block grant programs that provide these resources include the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), the Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons With HIV/AIDS Grant (HOPWA). As a condition of receiving these funds, the City of Cincinnati is required to submit a 5-Year Consolidated Plan, which outlines the City's housing and community development needs and priorities, and an Annual Action Plan that identifies how the City plans to allocate the HUD funding to address those priority needs. HUD determines the amount of each grant by using a formula comprised of several measures of community need, including the extent of poverty, population, housing overcrowding, age of housing, and population growth lag in relationship to other metropolitan areas.

The City of Cincinnati is required as a recipient of these federal funds to have a detailed Public Participation Plan that contains the City's policies and procedures for public involvement in the Consolidated Plan process and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) and Housing Opportunity for Persons with AIDS (HOPWA) funding. The Public Participation Plan must be available to the public. The purpose of this Public Participation Plan is to provide for and encourage residents to participate in the development of the City of Cincinnati's Consolidated Plan, Annual Action Plan, any substantial amendment to the Consolidated or Annual Action Plan, the Assessment of Fair Housing, and the Consolidated Annual Performance and Evaluation Report (CAPER).

- B. The City of Cincinnati intends to encourage participation of all residents, including but not limited to:
1. Individuals who reside and/or work in the City of Cincinnati;
 2. Low- to moderate-income persons;
 3. Community Development Advisory Board;
 4. Cincinnati / Hamilton County Continuum of Care;
 5. Protected classes and organizations that assist protected class members;
 6. Non-English speaking persons;
 7. Neighborhood organizations that focus on children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons;
 8. Organizations that enforce fair housing laws;
 9. Cincinnati Metropolitan Housing Authority;

10. Neighborhood Community Development Corporations;
11. Neighborhood faith-based organizations;
12. Community Councils;
13. Neighborhood business associations;
14. Philanthropic organizations;
15. Local and regional institutions; and
16. Public housing agencies and residents of public and assisted housing developments.

C. The City of Cincinnati recognizes the importance of public participation and works to maximize public involvement through continual exploration of alternative techniques for optimal engagement.

D. This Public Participation Plan meets the Citizen Participation and Consultation requirements for entitlement jurisdictions.

II. PROGRAM POLICY

A. Provide for and encourage public participation, with particular emphasis on participation by persons of low- to moderate-income;

B. Provide residents with reasonable opportunity to comment on the Public Participation Plan, Consolidated Plan, Annual Action Plans, any substantial amendment to such plans, the Assessment of Fair Housing, and the Consolidated Annual Performance and Evaluation Report and to consider all comments and views received;

C. Minimize the displacement of persons. In the unlikely event of any such displacement, the City of Cincinnati will adhere to the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR Part 24;

D. Provide for public hearings to obtain resident views and to respond to proposals and questions at all stages of the community development program, including the review of proposed activities and review of program performance. Hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and in an accessible location;

E. Provide residents, public agencies, and other interested parties with reasonable and timely access to local meetings, information, and records relating to the proposed use of funds;

F. Provide for technical assistance to groups representative of persons of low- to moderate-income who request such assistance in developing proposals; and

G. Provide for a timely written answer to written inquiries.

III. TERMS & DEFINITIONS

Annual Action Plan

The Annual Action Plan describes how the City will use its anticipated CDBG, HOME, HOPWA, and ESG resources to implement in a one-year time frame. The Annual Action Plan also describes other actions that the City, its subrecipients, and other community partners will take to implement its Consolidated Plan.

Assessment of Fair Housing

The Assessment of Fair Housing is an analysis of fair housing issues and contributing factors in the region that results in an identification of fair housing priorities and goals.

Public Participation Plan

The required plan that sets forth the City's policies and procedures for public participation in HUD programs. The adopted plan must be used when developing the Consolidated Plan, Annual Action Plan, substantial amendments to the plan, the Assessment of Fair Housing, and the Consolidated Annual Performance and Evaluation Report. The City of Cincinnati's required plan is referred to as the Public Participation Plan.

Community Development Advisory Board (CDAB)

An advisory board to the City Manager made up of residents, staff and community agencies. It is the official body for reviewing and making recommendations for the CDBG and HOME programs.

Community Development Block Grant (CDBG)

A federally funded program administered by HUD whose primary objective is to principally benefit persons of low- to moderate-income by providing decent housing, suitable living environments, and through expanding economic opportunities.

Consolidated Annual Performance and Evaluation Report (CAPER)

Reports the one-year progress and performance of the CDBG, HOME, HOPWA, and ESG programs administered by the City and its Subrecipients. The City of Cincinnati's CAPER is due annually on March 31st.

Consolidated Plan

A five-year comprehensive plan that describes the City's housing and community development needs and sets forth local strategies to address them. The Consolidated Plan must be submitted to HUD in order for the City to receive CDBG, HOME, HOPWA, and ESG funds.

Continuum of Care (CoC)

The CoC group is organized to carry out the responsibilities required by the HUD CoC Program and is composed of representatives of organizations, including nonprofit homeless providers, victim service

providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate. The CoC promotes the communitywide goal of ending homelessness and meets at least semi-annually.

Emergency Solutions Grant (ESG)

A federally funded program administered by HUD whose objectives are to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG funds are allocated the annual “Prince of Peace” process to allocate ESG shelter operation funding, an allocation based upon program performance. Higher performing projects, as determined by HMIS (Homeless Management Information System) data, are recommended for a higher level of funding. The allocation process is based on established performance measures developed in collaboration with the ESG recipients and subrecipients. The process includes baseline funding for each agency that has applied for the funding, based on each facility’s outcome data in comparison to the other local facilities. During the annual Price of Peace meeting, each agency provides a brief program description and requests changes to the proposed allocation based on facility needs in the coming year. A consensus is reached regarding the final allocation for each agency and the allocation is submitted to the City and County for inclusion in their respective Annual Action Plans.

HOME Investment Partnerships Program (HOME)

A federally funded program administered by HUD whose objectives are to provide decent, safe and affordable housing, alleviating the problems of excessive rent burdens, homelessness and deteriorating housing stock nationwide.

Housing Opportunities for Persons With HIV/AIDS (HOPWA)

A federally funded program administered by HUD whose objectives are to address the housing needs of people living with HIV/AIDS and their families. The City of Cincinnati’s HOPWA program serves the eligible metropolitan statistical area of 15 counties within southwest Ohio, southeast Indiana, and northern Kentucky. A HOPWA Advisory Committee consisting of representatives of the agencies administering these funds as well as City representation allocates funding based on statistical information on number of cases of HIV/AIDS by county and state to ensure that each geographic area is receiving funding commensurate with need.

Low- to Moderate-Income (LMI)

Low- to moderate-income represents those whose income are at 80% or below the area median family income, as determined by HUD income limits, published annually.

U.S. Department of Housing and Urban Development (HUD)

The federal agency that oversees the use of CDBG, HOME, HOPWA, and ESG funds, approves the City's Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), any amendments to the aforementioned items, and the Assessment of Fair Housing. HUD also is the agency that monitors the City for compliance with all applicable regulations.

IV. COMMUNITY DEVELOPMENT ADVISORY BOARD (CDAB)

The CDAB is an advisory board and public participation mechanism for HUD programs. Members are appointed by the Mayor with City Council approval.

The primary purpose, function, and duty of CDAB is to:

A. The mission of CDAB is to advise and assist the City Manager in planning the allocation of HUD entitlement resources for community development, economic development, and human services in the City of Cincinnati.

B. CDAB makes recommendations to the City Manager regarding the allocation of available Consolidated Plan Program resources for CDBG and HOME for housing and community development purposes.

C. The CDAB also comments on the consistency of proposed housing projects, as required by federal housing and community development grant programs.

The CDAB consists of a 17-member volunteer group consisting of 13 diverse community leaders and 4 City representatives. The following is the community leader composition of the CDAB according to the Cincinnati Municipal Code: community council members (3), lending institutions (1), small business advocate (1), human services (1), trades / labor representation (1), low income advocate (1), housing authority (1), real estate community (1), developer (1), corporate community (1), community development corporation representative (1), and City of Cincinnati staff representation (4).

V. PUBLIC COMMENT

A. The City of Cincinnati will provide a minimum of thirty (30) days to receive comments from the public on proposed Consolidated Plan, Annual Action Plans, substantial amendments to the Consolidated and Annual Action Plans, and the Assessment of Fair Housing.

B. The City of Cincinnati will provide a minimum of fifteen (15) days to receive comments from the public on the Consolidated Annual Performance and Evaluation Report (CAPER).

C. All comments shall be submitted to:

City of Cincinnati

Department of Community and Economic Development

805 Central Avenue Suite 700
Cincinnati, Ohio 45202

D. All written comments received will be reviewed and maintained in the City's Public Participation File.

VI. PUBLIC HEARINGS

A. The City of Cincinnati will hold a minimum of two (2) public hearings per year to obtain residents' views and to respond to proposals and questions. The hearings will address housing and community development needs, development of proposed activities, and review of program performance.

B. One of the public hearings will be held during the development of the Consolidated Plan and the Assessment of Fair Housing, prior to or during the public comment period. Information will include an overview of HUD programs, anticipated resources for the upcoming program year, proposed activities to be undertaken, including the estimated amount that will benefit persons of low- to moderate-income and other actions the City will be involved in to achieve the goals identified in the Consolidated Plan. All comments received will be summarized and included in the Consolidated Plan and Annual Action Plans.

C. One of the public hearings will be held during the development of the Consolidated Annual Performance and Evaluation Report, prior to or during the public comment period. Information will include program evaluation and performance, accomplishments and expenditures during the program year. All comments received will be summarized and included in the CAPER.

D. The City will hold a general public hearing for development of the next years' Annual Action Plan. The public hearing will be held to obtain views of residents, public agencies, and other interested parties on identifying local housing and community development needs, issues and priorities. Further, comments and suggestions about strategies and activities to address needs will be encouraged, summarized and included in the Annual Action Plan.

E. All public hearings will be advertised in a local publication of general circulation, through social media including the City's website, and notice given to the CDAB. All notices shall be published, delivered or posted at least fifteen (15) calendar days prior to the date of the public hearing.

F. All public hearings will be held at times and locations convenient to potential and actual beneficiaries, with suitable accommodation for persons with disabilities. The City of Cincinnati will also make every effort to accommodate non-English speaking residents who wish to participate in the public hearing. The City of Cincinnati will attempt to locate and secure translators. In those instances when non-English speaking residents attend a meeting where no translator is present, the City is responsible for holding an additional meeting for the same purpose, with a translator present.

VII. CONSOLIDATED PLAN AND ANNUAL ACTION PLANS

A. The City of Cincinnati will make available to residents, public agencies, and other interested parties information regarding the amount of HUD entitlement grant funds and program income the City receives, range of activities to be undertaken, including the estimated amount that will benefit persons of low- to moderate-income, the City's plan to minimize the displacement of persons and to assist any persons displaced by housing activities, and any other relevant data that will assist in helping the public understand and participate in the program processes.

B. The City will publish and otherwise make available the Consolidated Plan and Annual Action Plan in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The publication and availability efforts will include publishing a notice of availability and summary of the applicable document in a publication of general circulation; placing the summary document on the City's website and other social media; sending electronic copies (by request via e-mail); and providing a reasonable number of free copies to requesting agencies or individuals.

C. The City will allow for a minimum 30-day review and comment period for the Consolidated Plan, Assessment of Fair Housing, and Annual Action Plans. All comments received and views expressed will be considered, summarized, and included in the final Consolidated Plan and Annual Action Plans.

VIII. SUBSTANTIAL AMENDMENTS

A. A substantial amendment to the Consolidated Plan and/or Annual Action Plan will be determined by the following criteria:

1. A substantial amendment is defined to include the following situations: the addition or removal of programs from the Consolidated Plan. However, creation of a new program addressing an Urgent Need national objective shall not be considered a substantial amendment.
2. Any proposed uses of HUD Section 108 Loan Authority or CDBG Float Loans are also considered a substantial amendment.

B. The City will publish and otherwise make available the Amendment to the Consolidated Plan and Annual Action Plan in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to review and submit comments. Amendments will be advertised in a local publication of general circulation, through social media including the City's website, and with notice given to the CDAB.

C. The City will allow for at least a 30-day review and comment period, including notice to the Community Development Advisory Board (CDAB), recommendation from the City Manager and approval from City Council through an Authorizing Ordinance, for Amendments to the Consolidated Plan, Annual Action Plans, and the Assessment of Fair Housing. All comments received and views expressed will be

considered, summarized, and included in the Substantial Amendment to the Consolidated Plan and Annual Action Plans.

IX. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

A. The City will publish and otherwise make available the Consolidated Annual Performance and Evaluation Report (CAPER) in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to review and submit comments. Public notices regarding the opportunity to review and comment on the CAPER will be advertised in a local publication of general circulation, through social media including the City's website, and notice given to the CDAB.

B. The City will allow for at least a 15-day review and comment period for the Consolidated Annual Performance and Evaluation Report (CAPER). All comments received and views expressed will be considered, summarized and included in the CAPER.

X. AVAILABILITY AND ACCESS TO RECORDS

A. The City will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the HUD programs. The CAPER, adopted Consolidated Plan, Annual Action Plan, any amendments, and the Assessment of Fair Housing will be made available to all interested residents. These documents will also be made available in a form accessible to persons with disabilities, upon request.

B. Documents will be available at the following:

City of Cincinnati

Department of Community and Economic Development

805 Central Avenue, Suite 700

Cincinnati, Ohio 45202

C. The City of Cincinnati will maintain records for five (5) years following the close of the program year.

XI. WAIVER FLEXIBILITIES

A In the event of a public emergency, the City of Cincinnati will implement available waivers to regulatory requirements with regards to the Public Participation Plan. The following waivers will be implemented as applicable:

1. Consolidated Plan Amendments to receive supplemental funding will provide no fewer than 5 days for public comment, rather than 30 days; and
2. The public hearings will be limited as appropriate and the City of Cincinnati will demonstrate best efforts to provide reasonable notice and opportunity to comment during Calendar Year 2020.

X. INQUIRY PROCEDURE

A. Inquiries regarding the City's program plans, policies, procedures, processes, documents and/or related questions may be written or phoned to:

City of Cincinnati
Department of Community and Economic Development
805 Central Avenue Suite 700
Cincinnati, Ohio 45202
Office: (513) 352-6146
Fax: (513) 352-6123
CommunityDevelopment@Cincinnati-Oh.gov

A written response or acknowledgment of written complaints or concerns will be provided, as practical, within fifteen (15) working days.

B. Persons wishing to comment on the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report, and/or the Assessment of Fair Housing to HUD may make such objections known to the appropriate HUD area office. The HUD area office serving the City of Cincinnati is:

Community Planning and Development Division
U.S. Department of Housing and Urban Development, Ohio State Office
200 North High Street Floor 7
Columbus, Ohio 43215-2499