

City of Lancaster, Pennsylvania
Department of Economic and Community Development

CITIZEN PARTICIPATION PLAN

For the Federally-Funded
FIVE-YEAR CONSOLIDATED PLAN AND
THE ONE-YEAR ACTION PLAN

Encompassing the
Community Development Block Grant (CDBG) Program
Emergency Solutions Grant (ESG) Program

PURPOSE: The purpose of Lancaster’s Citizen Participation Plan is to encourage and enable the citizens of the City to participate in the development, implementation, and assessment of the City’s five-year “Consolidated Plan” and its annual, one-year “Action Plan” encompassing the City’s Federally-funded Programs (see Exhibit One for additional information regarding Lancaster’s “Consolidated Plan”).

The U.S. Department of Housing and Urban Development (HUD) requires that the City of Lancaster adopt a Citizen Participation Plan as a condition of eligibility for receiving Federal funds through the Community Development Block Grant (CDBG) Program and the Emergency Solutions Grant (ESG) Program (which are received through a competitive application process from the Commonwealth of Pennsylvania’s Department of Community and Economic Development). Although these citizen participation requirements are designed especially to encourage participation by low- and very low-income persons, particularly those living in blighted areas and in areas where Federally-funded activities are proposed, the City of Lancaster is expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons as well as persons with mobility, visual, or hearing disabilities.

The Americans With Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973 (as amended) are federal anti-discrimination statutes designed to remove barriers which prevent individuals with disabilities from enjoying the same opportunities that are available to persons without disabilities. One important opportunity is to attend and participate in public meetings scheduled by the City to provide information to citizens and to solicit their comments regarding actions to be taken by the City. Therefore, the City has established a policy of providing accommodations for persons with disabilities who wish to attend public meetings. Accordingly, all advertisements of public meetings to be conducted by the City include the statement that (1) the meeting will be held in a facility accessible to persons with disabilities, and (2) any persons with a disability who will require an accommodation of some type while attending the public meeting should notify the City in advance so that

the appropriate accommodations can be arranged. A voice phone number (291-4743), the City's TDD number (TDD 291-4761), and an email address are also provided in meeting advertisements.

The City of Lancaster and the County have Lancaster have entered into a consortium for the Home Investment Partnership (HOME) Program. The Lancaster County Housing and Redevelopment Authority (LCHRA) is the lead agency for this consortium, and all citizen participation regarding the City's HOME funds is administered by LCHRA.

CITIZEN PARTICIPATION PLAN – REQUIRED ELEMENTS

A. Citizen Involvement With Preparation of the Five-Year “Consolidated Plan” and Annual, One-Year “Action Plan”

Each year, beginning approximately seven months prior to the expected start of the Consolidated Grant Program year, the City of Lancaster will take the following steps to ensure that citizens of Lancaster, community-based organizations, private developers, governmental entities and others are aware of (1) the amount of federal assistance the City expects to receive each year through the CDBG Program through the Consolidated Plan, (2) the range of activities that may be undertaken through the Plan, (3) the focus on benefit to persons of low- and very low-income, and (4) the strategy to minimize displacement of persons and to assist any persons displaced.

Generally, because of reduced amounts of CDBG funds received by the City, an open application process does not occur. However, if the City receives enough funds to open an application process, the following two-phase procedure will be followed:

Phase One: Release of Funding Applications

Release of funding applications will occur in the context of community briefings and hearings. The City of Lancaster will require that all potential project sponsors, whether City agencies, private developers, non-profit corporations or other governmental agencies, prepare and submit a funding application prior to the announced deadline for such applications. Normally the application deadline will be on or about September 1 of each year, for activities expecting to receive funds under the Consolidated Grant Program starting January 1 of each year. The availability of funding applications will be advertised no less than 30 days prior to the submission deadline for such applications. The City will provide technical assistance to organizations in completing such applications.

Phase Two: Review Panel for Funding of Applications

The City of Lancaster will submit applications for funding from the Consolidated Grant Program to the “Grant Application Review Panel(s)” for critique and ranking for funding from available resources. The City of Lancaster will take account of the recommendations by Grant Application Review Panel members and will normally accept these recommendations for funding. However, the final determination regarding both the acceptance of an application and the actual funding amount awarded (which could be less than is requested) is reserved by the City of Lancaster as the entity ultimately responsible to HUD.

1. MEETINGS WITH THE MAYOR

At least two times per year, the Mayor of the City of Lancaster holds neighborhood quadrant meetings. These meetings are advertised in all media outputs, including television, radio, newsprint, the City Newsletter which goes to every house in the City, and to neighborhood groups. The meetings are held in 5 different locations around the City. This provides greater accessibility for those who live in different sections of the City. It also provides multiple meeting dates to be more accessible for citizens with differing schedules. At the meetings, citizens are informed about City projects and programs. The citizens are given the opportunity to ask questions and to share their comments and concerns with the Mayor. The Mayor shares this information with appropriate City staff, which is discussed and taken into consideration during plan development.

2. ANNUAL ACTION PLAN ADVERTISEMENT AND COMMENT PERIOD

A notice announcing the draft of the proposed Annual Action Plan is placed in the legal section of the local newspaper. This same notice appears on the City’s website, where a draft of the plan is located electronically. Citizens may also visit City Hall to review a copy of the plan. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

3. ANNUAL PLAN ADVERTISEMENT & PUBLIC HEARING PRESENTATION

The proposed Annual Action Plan, including recommendations for the funding of agencies and for the amount of funds to be allocated will be published community-wide for comment in the Lancaster Newspapers, and on the City’s website, during the month of September. This announcement includes a notification of a public hearing ,conducted in City Council Chambers concerning the proposed Action Plan and allocation of funds. A 30-day public comment period will be provided, starting from the date of the ad announcement. Copies of the Action Plan will be available to the public during the 30-day comment period, at City Hall and electronically on the City’s website. All written comments received and all oral testimony at the public hearing will be recorded and made available as part of the Action Plan.

4. OFFICIAL ADOPTION OF THE PLAN

The Five-Year Consolidated Plan or the annual, one-year “Action Plan,” including all recommended funding allocations, will be submitted to City Council for consideration at the first City Council meeting in September. Council’s role is to approve the submission of the “Action Plan” to the Federal Department of Housing and Urban Development (HUD).

5. SUBMISSION OF THE PLAN TO HUD

The Consolidated Plan, on applicable years, and/or the Action Plan will be submitted to HUD 45 days prior to the start of the City’s program year for Federally-funded activities on January 1. This period will ensure the timely processing and approval by HUD and thus to allow federal funds to be available in time for the start of the new program year.

6. IMPLEMENTATION

Starting January 1 of each year the City will carry out the activities in the approved Five-year Consolidated Plan and the annual, one-year “Action Plan.”

B. Program Amendments

1. CDBG Program: This section concerns the examination of, appraisal of, and comment on proposed amendments to the CDBG Program during the Program Year which would result in a significant change in the use of program funds.

During the course of the City's Program Year, it may become necessary or desirable to amend the “Action Plan.” The City will amend its Plan if it decides (1) not to carry out an activity described in the Final Statement, (2) to carry out an activity not previously described, or (3) to substantially change the purpose, scope, location, or beneficiaries of a project. Lancaster's criteria for substantial change is attached as Exhibit Two.

Prior to amending its Final Statement, the City provides citizens with reasonable notice of, and opportunity to comment on, any proposed changes in its use of funds via a paid advertisement in both daily newspapers. The City considers such comments and, if deemed appropriate, modifies the Program changes. The City will subsequently make available to the public, and submit to HUD, a description of any substantial changes adopted.

C. Performance

1. Examination of, appraisal of, and comment on the City's "Consolidated Annual Performance and Evaluation Report" (CAPER) prior to submission to HUD.

The CAPER is a document produced annually by the City in narrative form and through the automated, "Integrated Disbursement and Information System" (IDIS) which provides a systematic format for reporting to HUD on the use of CDBG funds. The CAPER is also used to provide information to the citizens and officials of Lancaster City. In addition, it is part of HUD's review of CDBG Program grantees and Congress's review of the national CDBG Entitlement Program. Lancaster City must submit its Consolidated Annual Performance and Evaluation Report to HUD each year by the end of September (within 90 days after the close of the CDBG Year each December 31). However, before submitting the CAPER to HUD, availability of the Report for public review and comment must be made known to City residents. Copies must be made accessible to City residents in sufficient time to permit them to review and comment on the Report prior to its submission to HUD.

Accordingly, the City places an invitation for review and comment regarding the latest CDBG Program CAPER each year via paid advertisements in the Lancaster Newspaper, and on the City's website. The CAPER is advertised as available for review on the City's website and during working hours on specific days in the offices of the City Department of Economic and Community Development, located in the Municipal Building, 120 North Duke Street. A telephone number and email address are also provided to obtain information regarding the City's CAPER.

The City will conduct an annual public meeting, generally in March regarding the CDBG program, for citizens to review and comment on the performance of the program activities which occurred during the program year (January 1 thru December 31 of the prior year)

D. Access to Consolidated Program Information Regarding the Use of Program Funds

At any time during the course of the program year, every citizen of Lancaster City has access to information related to the projects and activities being financed with funds from the current Program Year or from prior Program Years. Such information includes, but is not limited to, project contracts and budgets, financial reports, performance data, and participant information. The availability of program records is consistent with applicable State and local laws regarding privacy and obligations of confidentiality.

E. Emergency Solutions Grant (ESG) Application

The City of Lancaster competes for ESG funds from the Pennsylvania Department of Community and Economic Development (DCED). Prior to the expected announcement of the application process for ESG funds, the City will meet with current subrecipients of ESG funds, as well other agencies identified who wish to receive funds. The City and potential applicants will identify activities to be applied for, as well as potential funding requests when possible. The City will then meet with the lead agency of the Lancaster Continuum of Care (PA-510), for consultation of proposed activities and agencies included in the potential funding request. The City will then meet with the Continuum of Care Planning Committee and again present the proposed activities and agencies to be included in the application. Any comments or suggestions made by either the lead agency or the Continuum of Care Planning Committee will be taken into consideration for the design of the final application to DCED.

A notice announcing the application, the public comment period and the public meeting is placed in the legal section of the local newspaper. This same notice appears on the City's website, where a draft or a summary of the application is located electronically. Citizens may also visit City Hall to review a copy of the application, and a copy of the application is also available at the public meeting. Citizen questions are directed to the Department of Economic Development and Neighborhood Revitalization. A 30-day public comment period is provided, as long as the application release and the application deadline allow for a 30-day period. Citizens are asked to submit comments in writing, either by letter or by email. All comments are considered and included in the submission of the plan.

The application will be presented to City Council and will not be submitted to the DCED without the approval of City Council. City Council will be made aware of any citizen comments received during the comment period or public meeting. Citizens are also welcome to comment on the application during the public City Council meeting at which the application is presented. Comments will be considered prior to the submission of the application to DCED.

Comments or Complaints Regarding the Consolidated Grant Program

Comments or complaints from individuals or organizations concerning the Consolidated Grant Program are responded to immediately or as soon as practicable by EDNR staff. Inquiries can be made by calling (717) 291-4743 (Voice) or (717) 291-4761 (TDY). Written inquiries should be addressed as follows:

City of Lancaster
Federal Consolidated Grant Program
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO Box 1599
Lancaster, Pennsylvania 17608-1599

The City of Lancaster will consider any written comments or views from citizens, or made orally at the public hearings, in preparing the Consolidated Plan, Action Plan, or amendments to the Plan or CAPER. 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 Consolidated Plan, Action Plan, amendment to the Plan or CAPER. Complaints are answered in writing within 15 days of receipt by the City. Written complaints should be addressed as follows:

City of Lancaster
Director,
Department of Economic Development and Neighborhood Revitalization

120 North Duke Street, PO Box 1599
Lancaster, Pennsylvania 17608-1599

F. Amendments to the Provision of Information About Consolidated Program Public Hearing for Non-English Speaking Residents

The City will make available translation services for Spanish-speaking residents at the public meeting where views on neighborhood and City-wide needs are expressed. The City can provide translation services for Spanish-speaking residents who come into the Municipal Building to obtain program information.

G. Furnishing Technical Assistance to Groups Regarding the Development of Program Proposals Representative of Low- and Very Low-Income Persons

The City's Department of Economic Development and Neighborhood Revitalization staff provides technical assistance to individuals or organizations regarding matters related to the completion and submission of Program Funding Application Forms to the City, when such forms are utilized. Technical assistance is offered via a cover letter (including the name and phone number of

a contact person) which is attached to every Program Project Funding Application Form. In addition, the City serves as a conduit for City-based organizations seeking other Federal or State grants to undertake projects addressing the Economic and Community Development needs of Lancaster City. These funds complement the funds received by the City through the Community Development Block Grant Program.

Temporary Citizen Participation Plan Amendments Due to CARES Act of 2020

The COVID-19 pandemic brought many changes to the administration of federal CARES Act funds, most specifically to the Citizen Participation requirements. HUD issued waivers regarding the method and timing of citizen participation for these funds and for Fiscal Year 2020 funds. For example, deadlines for plan submission were extended and virtual meetings were permitted to enable public comments. Due to the urgency of the pandemic and the need to provide the local community with access to much needed federal funds, the public comment period was reduced to no less than five (5) days. HUD outlined these waivers in the CPD Notice issued in early April of 2020 by John Gibbs, Assistant Secretary, Acting Director concerning Availability of Waivers of Community Planning and Development (CPD) Grant Programs and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and mitigate Economic Impacts caused by COVID-19. This notice included the CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response Guide (Guide)

The Guide describes the immediate availability of a 5-day public comment period for amendments and new plan submissions, uncaps the percentage of CDBG funding for public services to prevent, prepare for, and respond to coronavirus, as well as other flexibilities. A summary of these waivers is listed below:

- Permits grantees to prepare substantial amendments to their most recent annual action plan, including their 2019 annual action plan. Grantees must identify the proposed use of all funds and how the funds will be used to prevent, prepare for, and respond to coronavirus.
- Eliminates the 15 percent cap on the amount of grant funds that can be used for public services activities.
- Provides that grantees may use CDBG-CV grant funds to cover or reimburse costs to prevent, prepare for, and respond to coronavirus incurred by a State or locality, regardless of the date on which such costs were incurred, when those costs comply with CDBG requirements.
- Provides that grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans. Expedited procedures must include notice and reasonable opportunity to comment of no less than 5 days. The 5-day period can run concurrently for comments on the action plan amendment and citizen participation plans. In-person public hearings are not required. Grantees may meet public hearing requirements with virtual 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.
- Extends the deadline for grantees to submit action plans and other updates to their consolidated plans submissions for fiscal years 2019 and 2020 to August 16, 2021.

Exhibit One

City of Lancaster, Pennsylvania

Community Development Block Grant Program (CDBG)
HOME Investment Partnership Program (HOME)
Emergency Shelter Grant Program (ESG)

UNDERSTANDING LANCASTER'S 'CONSOLIDATED PLAN'

The Federal Government of the United States has many programs operated by various departments through which it redistributes tax money to State, City, and County governments across the country. The purpose of redistributing tax money to these governments is to help them resolve or reduce physical, economic development, and social problems in their jurisdictions.

A primary source of Federal funds for State and local governments (including the City of Lancaster) is the Department of Housing and Urban Development (HUD). Major HUD formula grant Programs include (1) the Community Development Block Grant (CDBG) Program, (2) HOME Investment Partnership (HOME) Program, (3) Emergency Shelter Grant (ESG) Program, and (4) the Housing Opportunities for Persons With AIDS (HOPWA) Program. The City of Lancaster receives funds through the CDBG directly from HUD. HOME funds are received jointly with the Lancaster County Housing and Redevelopment Authority (LCHRA) as the City and County are operating under a limited consortium for the HOME Program. The County is responsible for the submission of the 5-year Consolidated Plan, as well as the submission of the Annual Action Plan as it relates to the HOME Program. The City creates and submits a separate Annual Action Plan for the CDBG Program. The City receives ESG Program Funds from the Pennsylvania Department of Community and Economic Development, through a competitive application process.

Each of these different HUD Programs previously required the preparation of separate annual plans with distinct citizen participation and other submission requirements. This disjointed planning process has been inefficient and time consuming, and considerable duplication of effort has occurred. To streamline the submission of documents, as well as coordinate planning, application and monitoring processes for its programs, HUD has initiated use of the Consolidated Plan. The Plan will help local governments, such as the City of Lancaster, to focus limited resources on broad community goals and objectives and to ensure that Federally-funded programs function in a coordinated manner.

The Consolidated Plan, a comprehensive planning document, will replace several separate documents now submitted to HUD by the City, including (1) the Comprehensive Housing Affordability Strategy (CHAS), (2) HOME Program Application, (3) Emergency Shelter Grant Program Description, and (4) CDBG Final Statement. The Consolidated Plan will be a document submitted annually to HUD by Lancaster that serves as the City's single planning document and application document for HUD funding under the CDBG, HOME, and ESG Programs. The City's Plan will cover the period from January 1 to December 31.

The three basic goals and related objectives to be addressed in Lancaster's Consolidated Plan (same as under the CDBG, HOME, and ESG Programs) are as follows:

Goal One: Provide Decent Housing

- Retain the affordable housing stock
- Increase the availability of permanent housing affordable to low-income persons
- Assist homeless persons to obtain affordable housing
- Increase supportive housing that includes structural features and services to enable persons with special needs to live in dignity

Goal Two: Provide a Suitable Living Environment

- Improve the safety and livability of neighborhoods
- Increase access to quality facilities and services
- Reduce the isolation of income groups within areas by expanding housing opportunities and revitalizing deteriorating neighborhoods
- Restore and preserve natural and physical features of special value for historic, architectural, or aesthetic reasons
- Conserve energy resources

Goal Three: Expand Economic Opportunities

- Create jobs accessible to low/moderate-income persons
- Provide access to credit for community development that promotes long-term economic and social viability

- Empower low/very low-income persons living in federally-assisted and public housing to achieve self-sufficiency

The joint Lancaster City and County five-year Consolidated Plan will create a unified strategy for community development and revitalization and promote partnerships among local institutions, nonprofit organizations, developers, community leaders, citizens and City officials. The process to develop the Plan will enable the City to bring together its needs and resources to develop and coordinate effective housing and community development activities. The five-year Consolidated Plan for Lancaster will contain a strategic plan which brings the needs and resources identified together into a unified, coordinated planning/ submission document. To develop a unified strategy, the City (with the assistance of citizens and community agencies) will undergo a comprehensive housing and community development self-analysis. As part of this analysis, the City will (1) inventory all of its resources, (2) identify its priority needs, (3) establish its housing and community development objectives, and (4) develop a coordinated strategy to achieve its objectives and resolve priority needs.

The City creates a one-year “Action Plan” that lists the activities the City will undertake during the next Program year using funds under the CDBG program for meeting housing and community development objectives. The one-year “Action Plan” will (1) describe the projects to be undertaken, (2) identify the location of each project, and (3) name the organization that will implement each project. A revised “Action Plan” will be developed during each year of the five-year Consolidated Plan period.

Citizen Participation will be a very important consideration in the formation of the City's Consolidated Plan and Action Plan. The City will adopt and implement a detailed “Citizen Participation Plan.” The public will have timely access to information relevant to the planning process. The City will make available to the public information regarding (1) the amount of Federal financial assistance that it expects to receive, (2) the range of activities that may be undertaken with the money, and (3) estimates of the number of persons expected to benefit from funded projects.

The “Citizen Participation Plan” will provide for technical assistance to citizen groups that request such assistance in developing proposals for funding under the programs covered in the Consolidated Plan. At least 30 days will be provided for public comment on the Plan before its submission to HUD.

Consultation with other organizations will also be an important aspect of Consolidated Plan formulation. The City will confer with public and private agencies that provide assisted housing, health services, and social services during the preparation of the Plan. Consultation will also occur with the Lancaster City Housing Authority concerning public housing needs and the Authority's planned Comprehensive Grant Program activities. In addition, the City will consult with adjacent units of government, particularly for problems and solutions that may go beyond a single jurisdiction.

Lancaster's Consolidated Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on November 15. The new Program Year will begin on January 1.

Two public hearings will be held concerning the Action Plan. The hearings will be conducted at three different stages in the Plan development process.

At the first public hearing, citizens will have the opportunity to review the City's proposed Action Plan, including identified housing and community development needs and the proposed use of Federal funds.

Later in the year, at a third public hearing, residents will have the chance to review program performance.

After the program year is complete, a second public meeting is held, where residents will have the chance to review program performance. The second public meeting is held prior to the submission of the Consolidated Annual Performance Evaluation Report (CAPER). All program activities carried out during the program year are included in the CAPER, and this public meeting allows citizens the opportunity to understand how federal funds were spent, and provide their feedback on program performance.

Lancaster's Action Plan must be reviewed and approved by HUD within 45 days of submission by the City. The Plan will be submitted to HUD by the City on November 15. The new Program Year will begin on January 1 and end December 31.

INTELLIGENCER JOURNAL, LANCASTER, PA.
Friday, March 3, 1989

Legal Notice

Notice of CDBG Program Amendment Criteria

The City must amend its CDBG Program Statement whenever it decides to (1) carry out an activity not previously described in the Program Statement, (2) not carry out an activity described in the Statement, or (3) substantially change the purpose or scope, cost, location, or beneficiaries of a project activity as outlined in the most recent Statement.

A "substantial change" to a project activity is defined as a modification which changes the basic elements or characteristics of the project to the degree where it can be said that the project's "targeted beneficiaries" or geographic "service area" has been significantly altered in terms of the original purpose or scope of the project as described in the most current Statement.

A "substantial budgetary change" is defined as increasing or decreasing a project's original funding allocation by an amount greater than \$50,000 or 50 percent -- the lesser amount of money derived from these two calculations is the one used to determine whether or not a "substantial budgetary change" is being proposed. A "substantial budgetary change" is also defined as one where a series of cumulative budget amendments are made which increase the cost of a project by more than \$50,000 or 50 percent.

Prior to executing an amendment to its Statement, the City will provide citizens with reasonable notice of and an opportunity to comment on such proposed "substantial changes." The City will consider any comments and, if deemed appropriate, modify its proposed "substantial changes" prior to forwarding it to HUD.