CITIZEN PARTICIPATION PLAN

City of McKeesport, PA

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Amended: May 6, 2020

For the Community Development Block Grant (CDBG) Program and Other Federal Grant Programs

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CITIZEN PARTICIPATION PLAN FOR THE CITY OF MCKEESPORT, PENNSYLVANIA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM AND OTHER FEDERAL GRANT PROGRAMS

SECTION I – GENERAL:

The City of McKeesport has prepared a new Citizen Participation Plan to bring the City into compliance with 24 CFR Part 91.105, *Citizen Participation Plan for Local Governments; as amended on March 14, 2016.* This new Citizen Participation Plan sets forth the City of McKeesport's policies and procedures for resident participation by encouraging residents to be involved in the development of the City's Five Year Consolidated Plan and Annual Action Plans, any amendments to those plans, applications for Section 108 Loan Guarantees, the Consolidated Annual Performance and Evaluation Report (CAPER), efforts to Affirmatively Further Fair Housing (AFFH), and all other Federal Grant Programs, if applicable.

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SECTION II – STANDARDS OF PARTICIPATION & GOALS FOR PARTICIPATION:

The Standards of Participation and Goals for Citizen Participation in the City of McKeesport, Pennsylvania, are as follows:

A. All aspects of the Community Development Block Grant (CDBG) Program, HOME Investment Partnership Program (HOME), efforts to Affirmatively Further Fair Housing (AFFH), and all other Federal Grant Programs, if applicable, shall be conducted in an open manner with freedom of access for all interested persons, groups and/or organizations.

B. To the greatest extent possible, there shall be involvement of: (1) low- and moderate-income persons, especially those living in slum and blighted areas; (2) in areas where CDBG funds are proposed to be used; (3) residents of public housing communities; (4) by residents of predominantly low- and moderate-income neighborhoods; (5) members of minority groups; (6) residents of comprehensive neighborhood revitalization strategy areas; (7) the elderly; (8) persons with disabilities; and (9) all persons directly or indirectly impacted or affected by the Community Development Block Grant Program, HOME Investment Partnership Program, efforts to Affirmatively Further Fair Housing (AFFH), and the Section 108 Loan Guarantee Program and/or all other Federal Programs, if applicable.

C. Public Hearings shall be held in neighborhoods that are accessible to low- and moderate-income individuals. In addition, the City of McKeesport's Department of Community Development staff will speak to any group about the City's Community Development Block Grant Program, HOME Investment Partnership Program, efforts to Affirmatively Further Fair Housing (AFFH), and other Federal Grant Programs, its past performance and its proposed or future activities.

D. There shall be, to the greatest extent possible, and throughout all stages of planning and development of the CDBG Program, HOME Program, efforts to Affirmatively Further Fair Housing (AFFH), the Section 108 Loan Guarantee Program and all other Federal Grant Programs, if applicable, a continuity of participation by City resident representatives.

E. Residents shall be provided, to the greatest extent possible, with timely and adequate information for the purpose of meaningful input into the CDBG Program, HOME Program, efforts to Affirmatively Further Fair Housing (AFFH), the Section 108 Loan Guarantee Program, and all other Federal Grant Programs, if applicable.

F. Low- and moderate-income persons, residents of slum and blighted neighborhoods, residents of predominantly low- and moderate-income neighborhoods; members of minority groups; residents of public housing communities; residents of neighborhood revitalization strategy areas (NRSAs); the elderly; persons with disabilities; and all persons directly or indirectly impacted or affected by the Community Development Block Grant Program, HOME Program, efforts to Affirmatively Further Fair Housing (AFFH), the Section 108 Loan Guarantee Program, and all other Federal Grant Programs, if applicable, shall be encouraged to submit their views and proposals regarding these programs.

G. The City of McKeesport will explore alternative public involvement techniques and quantifiable ways to measure efforts to encourage resident participation in a shared vision for changes in the City and its neighborhoods, and review of the City's program performance.

H. Consultation will be made, in conjunction with the McKeesport Housing Authority, for the participation of residents of public housing and assisted housing developments, during the process of developing and implementing the Five Year Consolidated Plan, Annual Action Plans, efforts to Affirmatively Further Fair Housing (AFFH), and the Section 108 Loan Guarantee, so residents of areas in which developments are proposed are included in the process.

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I. The City of McKeesport shall provide information to the McKeesport Housing Authority about consolidated plan activities related to the Housing Authority's developments and surrounding communities so that the Housing Authority can include this information in its annual Public Housing Comprehensive Grant Program.

J. The City will take appropriate actions to encourage participating of all its residents, including minorities and non-English speaking persons, as well as persons with disabilities.

K. The City will encourage the participation of local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing and implementing the Five Year Consolidated Plan.

SECTION III – SCOPE OF PARTICIPATION:

A. Application Development:

Prior to the submission of the Five Year Consolidated Plan, Annual Action Plan, any application for CDBG funds, HOME Program funds, efforts to Affirmatively Further Fair Housing (AFFH), an application for the Section 108 Loan Guarantee funds, and any other Federal Grant funds, if applicable, and prior to the submission of an application for a substantial amendment, the City of McKeesport's Department of Community Development, in addition to meeting the minimum requirements, shall provide the following for public comment:

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

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9. efforts and plans to affirmatively further fair housing

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

B. Program Implementation:

Resident involvement may take the form of focus groups, direct involvement, self-help efforts, or other types of resident participation during program implementation. The Consolidated Annual Performance and Evaluation Report (CAPER) of the City of McKeesport's Department of Community Development will be made available to the general public for the purpose of reviewing the accomplishments of the City's CDBG and other Federal Grant Programs, as applicable.

C. Monitoring Evaluation:

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

1. direct contact with staff;
2. direct contact between staff and groups; and
3. direct contact between residents and the Mayor's office.

D. Submission of Views and Proposals:

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

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

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

1. the planning process;
2. the annual application process; and
3. the implementation stage.

Responses to all submissions shall be in a timely fashion and shall not exceed a period of thirty (30) days after the voicing of a comment, or the date of receipt of a written comment or inquiry.

E. Complaints:

All complaints regarding any aspect of the Community Development Block Grant Program, efforts to Affirmatively Further Fair Housing (AFFH), the Section 108 Loan Guarantee Program, and all other Federal programs, if applicable, shall be provided in a timely manner and a written response will be provided within thirty (30) working days after the voicing of a complaint or the date that the written comment was received by the City of McKeesport.

F. Technical Assistance:

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

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

G. Adequate Information:

The City shall provide full public access to the CDBG program information and affirmative efforts to provide adequate information to residents, especially those who are low- and moderate-income, those who are residing in predominantly low- and moderate-income neighborhoods or slum and blighted neighborhoods, the disabled, and non-English speaking residents. Information shall be provided on the CDBG, HOME, the Section 108 Loan Guarantee Program, efforts to Affirmatively Further Fair Housing

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(AFFH), and all other Federal Grant Programs, if applicable, including at a minimum the following:

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

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d. information on contracting and purchasing procedures, environmental policies, fair housing, equal opportunity, relocation provisions, the 24 CFR Part 58 environmental review process, affirmative action and any other requirements or regulations relating to the CDBG program; and

e. cost of copying will be as established by local and state laws, as outlined in the City's Freedom of Information Policy.

H. Meetings:

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

1. Public meeting/hearings shall be held on a continuous basis, at least two (2) times per year at different stages of the program year for the purpose of obtaining resident views on the development of needs, the review of proposed activities and review of program performance. At least one (1) public hearing must be held during the planning process for the proposed Five Year Consolidated Plan, Annual Action Plan, efforts to Affirmatively Further Fair Housing (AFFH), the Section 108 Loan Guarantee Application and all other Federal Grant Program applications. The second public hearing must be held on the proposed plans, or applications for funds prior to City Council approval and submission to HUD.

2. Public meeting/hearing notices shall be published at least ten (10) calendar days prior to the hearing date and shall be advertised in the local newspaper of general circulation in the area.

I. Public Notice:

1. A notice will be published in the local newspaper of general circulation in the City that the proposed Five Year Consolidated Plan, Annual Action Plans, and any plans to affirmatively further fair housing will be on public display for a period of not less than thirty (30) days in order to receive resident comments prior to approval by the City Council.

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2. Copies of the proposed plans will be available at the following locations:

    a. **Department of Community Development**
    500 Fifth Avenue, 2nd Floor
    McKeesport, PA 15132

    b. **Office of the City Clerk**
    500 Fifth Avenue, 2nd Floor
    McKeesport, PA 15132

    c. On the website at: http://www.mckeesport-pa.gov

3. Included in the Plans will be an Executive Summary of the proposed plan which describes the contents, purpose, and a list of the locations where copies of the entire proposed Five Year Consolidated Plan, Annual Action Plans, and any plans to Affirmatively Further Fair Housing (AFFH) may be examined. In addition, a reasonable number of free copies of these Plans will be made available to residents or groups that request it.

4. The City of McKeesport will consider any comments or views of residents received in writing or orally at the public meetings/hearings, in preparing the final Five Year Consolidated Plan, Annual Action Plans, and plans to Affirmatively Further Fair Housing (AFFH). A summary of all comments, including those comments not accepted and the reason therefore, shall be attached to the final Five Year Consolidated Plan and Annual Action Plans.

5. Final copies of the Five Year Consolidated Plan, Annual Action Plans, and plans to Affirmatively Further Fair Housing (AFFH) will be available for public inspection at the following locations:

    a. **Department of Community Development**
    500 Fifth Avenue, 2nd Floor
    McKeesport, PA 15132

    b. **Office of the City Clerk**
    500 Fifth Avenue, 2nd Floor
    McKeesport, PA 15132

    c. On the website at: http://www.mckeesport-pa.gov

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6. The Department of Community Development will mail/distribute notices for public meetings/hearings to all organizations that have previously expressed an interest in the Programs, which have previously submitted applications or requested funds under the Programs, or who have requested such notification, and will be posted at the offices of the City Clerk and at the Department of Community Development.

J. Continuing Activities:

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

K. Copies of Substantial Amendments to the Five Year Consolidated Plan, Annual Action Plans and Consolidated Annual Performance and Evaluation Reports:

Copies of the above will be available for reading upon request at the offices of Department of Community Development and office of the clerk and via the website at http://www.mckeesport-pa.gov.

L. Access to Records:

The City shall provide full and timely disclosures of its program records. The City will provide these disclosures within a reasonable period of time. Additionally, all public, and non-private records and documentation concerning the Community Development Block Grant Program, HOME, efforts to Affirmatively Further Fair Housing (AFFH), and all other applicable Federal Grant Programs shall be made available by appointment during the hours of 9:00 AM to 4:00 PM, Monday through Friday. Personnel records, and the personal financial records of program participants/applicants are not available for public inspection.

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

1. Definition:

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

a. A change in the allocation of priorities, National Objectives, or a change in the method of distribution of funds

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b. A proposal to undertake a new activity, using funds from any program covered by the Five Year Consolidated Plan (including program income received from previous year's funds), and not previously described in the annual action plan;

c. A change in the purpose, scope, location or beneficiaries of a previously approved activity;

d. The use of Program Income that was not previously allocated to an eligible activity;

e. Deletion or elimination of a previously approved activity;

f. A change of 50% of more of a line item amount of an approved activity, either increased or decreased; or

g. The use of contingency or unprogrammed funds, based on the following criteria.

2. Criteria:

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

a. **Purpose** - the original purpose for which the activity was selected has changed, including the category of the National Objective selected.

b. **Scope** – the size or scope of work of the project activity has increased or decreased which changes the cost of the activity by more than 50% of the total original budgeted dollar amount for that activity.

c. **Location** - the location of the project activity is different from that originally proposed, or the size of the project service area has increased or decreased by 25% in size, or the location of the activity had to be relocated to another area.

d. **Beneficiaries** - the number of beneficiaries has been reduced by 25% or more, and/or the activity no longer serves at least 51% low- and moderate-income persons.

e. **Cost** – the total cost of the activity has increased or decreased by 50% or more than the original budget amount.

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f. **New Activity** – a new activity is proposed which was not previously approved.

g. **Deleted or Canceled Activity** – a previously approved activity is proposed to be deleted/canceled from the approved plan.

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

3. Procedure:

A description of the substantial amendment to the Five Year Consolidated Plan or the Annual Action Plan will be published in the local newspaper of general circulation. A period of no less than thirty (30) days will be provided to receive resident comments prior to the approval of the amendment. The date, time, and place of the public meeting/hearing shall be listed. The public meeting/hearing shall be published at least ten (10) calendar days prior to the hearing date and shall be advertised in the local newspaper of general circulation in the area.

a. The City will consider any comments or views of residents received in writing or orally at the public hearing, in preparing the substantial amendment of the Five Year Consolidated Plan or Annual Action Plans. A summary of any comments or views, as well as a summary of any comments or views not accepted and reasons therefore, shall be attached to the substantial amendment of the Five Year Consolidated Plan and Annual Action Plan.

b. The substantial amendment must be presented to and approved by the City Council of McKeesport.

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N. Emergency Activities:

During the course of implementation of the CDBG program, if the City makes an emergency declaration as a result of a situation or condition that has arisen through no fault of the City, immediate action or remediation may be taken. If CDBG funds are not available to resolve or remediate that situation or condition, the City may proceed with corrective action during the 30 day comment period. The City must publish a notice concurrently, in the newspaper of general circulation in the area, and allow

residents to respond to the expenditure of CDBG funds during the 30 day comment period.

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

A notice will be published in the local newspaper of general circulation in the area informing the public of the availability of the City's Consolidated Annual Performance and Evaluation Report (CAPER) and providing the opportunity to comment on the CAPER. A period of no less than fifteen (15) calendar days will be provided to receive resident comments prior to the submission of the CAPER to HUD.

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

P. Non-English Speaking Residents:

The City of McKeesport Department of Community Development will have to be notified at least three (3) days in advance of a public meeting/hearing that special accommodations are needed including a translator, for any person who is disabled and non-English speaking residents, so that arrangements can be made to accommodate the resident to participate in the public meeting/hearing. Also, a summary of the minutes of the hearing will be transcribed, when applicable, for the benefit of non-English speaking persons.

Q. Persons who are Disabled:

The City will make reasonable accommodations for all persons who have a physical disability so they can participate in public meetings/hearings. The City will have to be notified at least three (3) days in advance of a public meeting/hearing. Persons with a hearing disability may contact the City through the PA Telecommunications Relay Services at 711. The McKeesport Municipal Building is accessible to persons who are physically disabled.

R. Resident Comments on the Citizen's Participation Plan:

The City of McKeesport will provide residents with the opportunity to comment on this Citizen Participation Plan. Copies of this proposed Citizen Participation Plan will be available at the City of McKeesport Department of Community Development, Office of the City Clerk, and on the website at http://www.mckeesport-pa.gov. A public notice will be

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published in the local newspaper of general circulation in the City for a period of ten (10) calendar days. Copies of the Citizens Participation Plan will be made available upon request, in a format accessible to persons with disabilities. Substantial amendments to this plan will follow the same procedure as the adoption of the original plan.

S. Revisions to the Citizen Participation Plan:

Revisions, amendments and changes may be made to the Citizen Participation Plan at any time. Citizens will be afforded the opportunity to comment on any amendments to the Citizen Participation Plan. A notice of the proposed amendments to the Citizen Participation Plan will be published in the local newspaper of general circulation in the area informing the public of the availability of the Citizen Participation Plan and its proposed changes. The City will advertise once and will notify citizens that they have a period of up to ten (10) calendar days from the date of the newspaper notice to respond to the proposed changes in the Citizen Participation Plan.

T. Declaration of an Emergency:

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of Pennsylvania, the City of McKeesport will follow the following process concerning public hearings and public display of plans.

- If the City is unable to hold open public hearings in person, the City will be allowed to instead hold virtual public hearings through conference calls or an online video conference call platforms as long as the public is able to provide public comments during the virtual public hearing.

- If the City is not able to publicly place the plans on public display at the locations referenced in the Citizen Participation Plan, the City will put the plans on the City's website (https://www.mckeesport-pa.gov/) and will also email copies of the plans to any person who will request a copy of the plans via email upon request.

- If the City Council is unable to conduct an open public forum type meeting, the City then can approve the plans at a City Council meeting through a virtual City Council meeting, if an in person Council meetings are not happening because of the Emergency.

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