

CITIZEN PARTICIPATION PLAN (CPP) (CDC Department Policy 2007, Amended and Approved by the CDC Executive Committee on 02/06/2018; Amended and Approved by the Community Development Commission and HOME Advisory Group on 06/02/2020; Amended and Approved by the Community Development Commission and HOME Advisory Group on xx/xx/2026)

I. Purpose

DuPage County (County) is an entitlement jurisdiction and, as such, receives entitlement grant funding from the U.S. Department of Housing and Urban Development (HUD).

The federal entitlement grant funds include: Community Development Block Grant (CDBG); HOME Investment Partnerships Program (HOME); Emergency Solutions Grant (ESG); and other grants as added by law.

As an entitlement jurisdiction, the County is required to prepare a Five-Year Consolidated Plan (Consolidated Plan), an Annual Action Plan, and a Consolidated Annual Performance and Evaluation Report (CAPER).

As required by the U.S. Department of Housing and Urban Development (HUD) Code of Federal Regulations for the Consolidated Plan (24 CFR Part 91.105), the County must adopt a Citizen Participation Plan (CPP) setting forth the County's policies and procedures for citizen participation. This CPP establishes standards for the County to provide for and encourage citizens, minorities, non-English-speaking persons, as well as persons with disabilities, to participate in the development of the Analysis of Impediments to Fair Housing Choice Plan (AI), revisions to the AI, Consolidated Plan, Annual Action Plans, Substantial Amendments (where applicable), and CAPERs. The County will emphasize participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where formula grant funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods.

Citizens will also be given the opportunity to comment on the CPP itself, both at initial drafting and when the County determines substantial amendments are made to the plan.

II. Applicability

This CPP is applicable to the activities of the DuPage Community Development Commission and DuPage County as they carry out their respective responsibilities for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) Program, and Emergency Solutions Grant (ESG), and other grants added by law. Documents covered include:

- Consolidated Plan for Housing and Community Development (Consolidated Plan); and
- Annual Action Plan; and
- Consolidated Annual Performance and Evaluation Report (CAPER); and
- Substantial Amendments (where applicable); and
- Analysis of Impediments (AI) to Fair Housing Choice; and
- Citizen Participation Plan.

III. Definitions

Amendment, Minor: Per regulations at 24 CFR 91.505(a), the County shall amend its approved plan whenever it makes one of the decisions noted below. A minor amendment may be

completed to change a previously adopted Consolidated Plan or Annual Action Plan that does not meet the thresholds to qualify as a Substantial Amendment. This includes, but is not limited to:

- Making a change in allocation priorities or in the method of distribution of funds;
- Carrying out an activity, using funds from any program covered by the Consolidated Plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the Annual Action Plan; or
- Changing the purpose, scope, location, or beneficiaries of an activity.

Amendments to the Consolidated Plan or Annual Action Plan that are not classified as Substantial Amendments will be modified internally at the discretion of the County. Once an amendment has been completed, the amendment will be made public on the County website and notice will be provided to the HUD field office.

Amendment, Substantial: A change to a previously adopted Five-Year Consolidated Plan or Annual Action Plan, which is subject to the citizen participation process, in accordance with this CPP. The County has determined changes resulting in a Substantial Amendment include:

- Modifications to proposed activities affecting at least 25% of the federal funds subject to the Consolidated Plan; and
- Changes in use of Community Development Block Grant (CDBG) program funds from one eligible activity to another (24 CFR 91.105(c)).

Analysis of Impediments to Fair Housing Choice (AI): In accordance with the Fair Housing Act, the County is required to administer programs and activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. As part of the County's certification to affirmatively further fair housing, an AI is prepared. The AI is a fair housing planning document which analyses and identifies impediments to fair housing choice within the County's jurisdiction. The AI also identifies actions to be taken to overcome the effects of any impediments identified through the analysis. The development of the AI generally coincides with the development of the Consolidated Plan. Should HUD publish future guidance pertaining to the County's obligation to affirmatively further fair housing which impacts this CPP, the CPP will be amended.

Annual Action Plan: The annual planning document that describes how the specific federal formula grant funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the Consolidated Plan.

Citizen Participation Plan (CPP): The CPP provides standards by which citizens are encouraged to participate in the development, planning, execution, and evaluation of the Consolidated Plan, Annual Action Plans, any substantial amendments, and CAPERs.

Community Development Block Grant (CDBG): A flexible program that is granted to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities.

Consolidated Annual Performance and Evaluation Report (CAPER): An annual report that evaluates the uses of the formula grants, outlines the yearly expenditures, and assesses the

County's progress at implementing its Annual Action Plan as well as reaching the goals set forth in the Consolidated Plan.

Consolidated Plan: A five-year planning document submitted to HUD for funding under any of the Community Planning and Development formula grant programs that, with community participation, identifies the County's affordable housing and community development needs and priorities.

Displacement: Displacement refers to the involuntary relocation of individuals from their residences due to housing development and rehabilitation activities paid for by federal funds.

Emergency Solutions Grant (ESG): The ESG program provides resources to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. ESG funds are authorized and intended for rapid rehousing, homelessness prevention, emergency shelter, street outreach, and eligible costs associated with the Homeless Management Information System (HMIS).

Formula Grant Funds: As used in this document, refers to federal grant programs under which the County receives funding as an entitlement, i.e., CDBG, HOME, and ESG.

Home Investment Partnerships Program (HOME): HOME is designed exclusively to create or preserve affordable housing for low-income households. Activities include those that build, buy, and/or rehabilitate affordable rental or homeownership housing, or provide direct rental assistance to low-income people.

Low to Moderate Income (LMI): LMI is 0-80% of Area Median Income (AMI) for a jurisdiction as defined annually by HUD. In addition, this includes those individuals presumed by HUD to be principally LMI (abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers).

Predominately Low- and Moderate-Income Neighborhood: Generally defined as a primarily residential area comprised of census tracts and/or census tract block group(s) in which a least fifty-one percent (51%) of the residents have an income not exceeding eighty percent (80%) of the Area Median Income (AMI).

Public Hearing: Public hearings provide the public, specifically LMI individuals and households, to make public testimony or comment. Public hearings are advertised in local newspapers and made accessible to non-English speaking individuals and those who have a disability.

U.S. Department of Housing and Urban Development (HUD): HUD is the federal government agency that creates and manages programs pertaining to homeownership, affordable housing, fair housing, homelessness, and community and housing development.

IV. Roles, Responsibilities, and Contact Information

DuPage County is the recipient of the federal entitlement grant funds listed above.

Community Development Commission

The DuPage County Community Development Commission (CDC) staff are responsible for the administration of HUD formula grant funds identified in this plan on behalf of the County. The Department is responsible for assuring citizen participation in its program and project development process, informing citizens about the planning process, facilitating meetings, preparing the Consolidated Plan and Annual Action Plan, preparing amendments, developing the CAPER, developing the AI, providing opportunities for public comments, and all other program requirements.

The CDC establishes and implements policies relating to the use of formula grant funds and recommends action to the DuPage County Board.

Contact Information for the CDC:

DuPage County Community Development Commission
421 N. County Farm Road, Room 2-800
Wheaton, IL 60187
630-407-6600
communitydev@dupagecounty.gov

DuPage County Board

The DuPage County Board is the elected legislative body governing the County of DuPage. It is responsible for approving the County's Consolidated Plan, Annual Action Plans, and substantial amendments to the plans. The DuPage County Board takes final action regarding formula grant programs.

V. Citizen Participation Policies

Encouraging Citizen Participation

Interested groups and individuals are encouraged to provide input into all aspects of the County's consolidated planning activities, from assessing needs and setting priorities through performance evaluations. The CPP outlines the County's responsibility for providing opportunities for active participation from citizens of all income levels to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to local residents.

In developing its Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER and AI, the County will take appropriate actions to encourage citizen participation by all residents of the County, including encouraging the involvement of:

- LMI persons, particularly those living in areas where federal funds are proposed to be used;
- Residents of predominantly low-and moderate-income neighborhoods;
- Minorities;
- Persons with Limited English Proficiency;
- Persons with disabilities;
- In conjunction with consultation with public housing agencies (PHA), residents of public and assisted housing developments (including any resident advisory boards, resident

councils, and resident management corporations), along with other low-income residents of targeted revitalization areas in which the developments are located; and

- Local and regional institutions, the DuPage County Continuum of Care (CoC) and other organizations, including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.

The County shall make an effort to provide information to the PHA about affirmatively furthering fair housing strategy and consolidated plan activities related to its developments and surrounding communities, so that the PHA can make this information available at the annual public hearing(s) required for the PHA Plan.

In addition to public comment periods and public hearings, the following alternative public involvement methods may be used to further engage citizens and interested parties and encourage participation:

- Community meetings;
- Focus groups;
- Surveys;
- Public Housing Agency (PHA) plans.

Specific actions to encourage participation by minorities, non-English speaking persons, and persons with disabilities may include outreach and collaboration with organizations primarily serving these populations, community meetings and focus groups emphasizing participation by these populations, or survey opportunities directed to these populations.

Availability of Draft and Approved Documents

At or as soon as feasible after the start of the public participation process, the County will make HUD-provided data and any other supplemental information the County plans to incorporate into its Consolidated Plan available to residents, public agencies, and other interested parties. The County may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website.

The draft and final versions of the CPP, Consolidated Plan, Annual Action Plan, CAPER, and all related amendments will be available online at the County's Community Development Commission website. Hard copies of all documents will be made available, upon request, at the DuPage County CDC office located at 421 N. County Farm Road, Room 2-800, Wheaton, IL 60187, during regular business hours. Internet access is available at all County public libraries. For residents and groups without access to the internet, a reasonable number of free copies of the plan or amendment will be made available upon request. Additionally, documents will be made available in a format accessible to persons with disabilities, upon request.

The draft Consolidated Plans, draft Annual Action Plans, and draft substantial amendments will be made available for public review and comment for a minimum of 30 days prior to their submission to HUD.

The draft CAPER will be available for public review and comment for a minimum of 15 days prior to its submission to HUD.

Public comment periods may be shortened or eliminated should HUD issue a waiver to such requirements in order to more expediently provide funds during times of urgent need.

Prior to approval by the DuPage County Board, the draft Consolidated Plan made available to residents, public agencies, and other interested parties will include information on the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income persons.

Public Hearings

The County will hold a minimum of two (2) public hearings per year, at two different stages of the program year, to obtain citizens' and stakeholders' input, views and comments as well as respond to proposals, comments, and questions. Together, these hearings will address housing and community development needs, development of proposed activities, provide strategies and actions for affirmatively furthering fair housing, and a review of program performance.

When the County is preparing for the development of the Consolidated Plan, one of the public hearings will be held before the proposed Consolidated Plan is published for comment.

At least one public hearing will be held to solicit comments on the development of the Consolidated Plan, AI, and/or Annual Action Plan, which includes the proposed uses of federal funds covered by each plan as well as fair housing issues. Another public hearing will occur during the development of the CAPER, which will be held prior to the submission to HUD.

Additional Public Hearings may be held as determined by CDC staff.

Public Hearings will be held on weekday evenings, no earlier than 5:00 pm.

In-person Public Hearings will be held at accessible locations within the County. Accommodations for persons with disabilities or those with limited English proficiency will be provided upon request, with at least three (3) business days' prior notification to CDC staff.

Virtual Public Hearings may be utilized in emergent situations where in-person public meetings are not allowable or feasible, or when necessary to comply with federal, state, or local emergency orders issued for public health, natural, or other declared disasters, or for other reasons as may arise from time to time. Virtual meetings will be conducted online using software that is free for participants and provides the ability for participants to ask questions in real time and for answers to be provided to all attendees. The software will allow for accessibility for persons with disabilities and those with limited English proficiency. Accommodations for persons with disabilities or those with limited English proficiency will be provided upon request, with at least three (3) business days' prior notification to CDC staff.

In the case of public hearings where a significant number of non-English speaking residents can reasonably be expected to participate, the needs of those residents will be met through coordination with translation services.

The CDC requires public hearings to be held by entities/organizations intending to apply for a potential project in which CDBG funds are being requested. For projects that are site-specific, the applicant is encouraged to hold the hearing at the site and to notify residents and/or clients who would be affected by the proposed activity. A notice must be published in a newspaper of general circulation in the DuPage Consortium area at least ten (10) calendar days prior to the public hearing.

Notice of Public Hearings and Public Comment Periods

A public comment period of at least thirty (30) days will be provided for each Consolidated Plan, Annual Action Plan, and substantial amendments to allow for the public to provide comments prior to the submission of plans to HUD, except as noted above under the *Availability of Draft and Approved Documents* section.

A public comment period of at least fifteen (15) days will be provided for each CAPER to allow for public comments prior to the submission to HUD.

Notices of public hearings, the availability of draft documents, and comment periods will be distributed, published in a newspaper of general circulation in the DuPage County Consortium area, and posted on the DuPage County Community Development Commission website. Notices will be distributed and published at least ten (10) calendar days before the public hearings and will include the subject, time, and location of the hearing as well as information regarding how to request accommodation and services available for persons with disabilities who wish to attend the public hearings.

Public notices of comment periods will announce the availability of relevant draft documents for public review and will include a description of contents and purpose of the document. The notices will describe how to obtain a copy of the document for review and clearly list all scheduled hearings with dates, times, and locations. The notices will include information on how to access documents online and list locations where hard copies will be available.

Notices, along with a link to the document(s) on the County's CDC website, will also be distributed electronically to municipalities, townships, non-profit organizations, and public libraries throughout the consortium area with a request to post the notice for public viewing.

The County will consider comments expressed by residents, public agencies, and other interested parties in writing to the CDC contact listed above under *Section IV. CDC Contact Information*, or orally at public hearings. Within each Consolidated Plan, Annual Action Plan, CAPER, or substantial amendment submitted to HUD, the County will provide a summary of all comments received either orally or in writing during the applicable 30-day or 15-day public review period, the County's subsequent response and/or action, and a summary of any comments or views not accepted and the reasons why. This information will also be made available to the public as part of the final document.

Minor amendments to the Consolidated Plan, Annual Action Plan, or this CPP do not require public notifications, public hearings, or DuPage County Board approval.

Additional comments are solicited on activities undertaken with CDBG, HOME, and ESG funds through the Environmental Review Record process. Notification and comment periods are in accordance with 24 CFR Part 58.

Assessing Language Needs

The County shall take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English-speaking residents. During the development of the Consolidated Plan, DuPage County updates its Language Access Plan. The Language Access Plan details procedures for assessing language needs within the jurisdiction and identifies the need for translation of notices and other vital documents.

Access to Records

In accordance with the Freedom of Information Act (FOIA), all records are open to the public. The County will provide residents of the community, public agencies, or other interested parties with reasonable and timely access to information and records relating to the County's Consolidated Plan, Annual Action Plans, AI, and use of funds under the programs covered by the plans and CPP during the preceding five years.

A hard copy of the final adopted Consolidated Plan, Annual Action Plans, CAPER, and AI will be made available for public inspection during normal business hours of the County. Access may be requested and arranged by contacting the CDC.

Electronic versions of the aforementioned documents are available at all times on the CDC website. Residents without computers and/or internet access may view the documents online at any public library location throughout the County.

If requested, the public will be provided with a reasonable number of free copies of each aforementioned document within a reasonable period of time. If requested, the document will be provided in alternative formats within a reasonable period of time, and copies may be mailed to those who are homebound.

Access to Meetings

All local meetings, including those of the DuPage County Community Development Commission, the CDC Executive Committee, the HOME Advisory Group, and any special committees created by these groups, are subject to the Open Meetings Act (OMA), including timely availability of meeting materials, as required under the OMA. OMA notification and reporting requirements apply any time a majority of a quorum of any of these groups assembles to discuss the business of the CDC. Local meetings are held in buildings accessible to those with disabilities. Any person with a disability may also request a reasonable accommodation by contacting the DuPage County Board offices. It is also the policy of the CDC to notify organizations that would be directly affected by a policy issue scheduled for consideration by one of the CDC's policy groups.

Technical Assistance

CDC staff will provide technical assistance to individuals and groups representative of persons of low- and moderate-income who request such assistance in developing proposals for funding

assistance under any of the programs covered by the Consolidated Plan. This technical assistance does not include the provision of funding but rather consultation and advisement provided on a one-on-one or group basis as deemed reasonable by CDC staff and/or the County.

Complaints

Written complaints related to the Consolidated Plan, amendments, revisions, and the CAPER will be referred to the appropriate County staff member for consideration and response. The County will provide a substantive written response within 15 business days, where practicable. If the complaint involves a policy issue requiring deliberation of one or more policy groups, the individual submitting the complaint shall be notified of this fact within 15 business days. The issue will be brought to the attention of the appropriate policy group at the next available meeting, and a response will be developed after their consideration.

Minimizing Displacement

Projects and activities funded with CDBG, HOME, or ESG funds will be planned in order to prevent the displacement of persons and businesses to the greatest extent feasible. In the event displacement occurs, the County will notify affected persons and provide assistance consistent with the provisions of the Uniform Relocation Act and all other applicable governmental regulations.