



City of Hammond
Citizen Participation Plan (CPP)
for
U.S. Department of Housing and
Urban Development Grants

This Citizen Participation Plan was adopted on **Tuesday, September 15, 2015**, by Hammond
Redevelopment Commission – **Amended - 8/19/2020**

Habla Espanol? Para la versión en Español, llamar el (219) 853-6501 o visitor gohammond.com

For alternate forms of this document for persons with disabilities, please contact (219) 853-6501

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Introduction

Each year, the City of Hammond receives funding allocations from the U.S. Department of Housing and Urban Development (HUD). These include the Community Development Block Grant (CDBG), the HOME Investment Partnerships Grant (HOME), and the Emergency Solutions Grant (ESG). As a condition of receiving these allocations, the City must satisfy annual planning and reporting requirements outlined in the federal regulations at 24 CFR Part 91. This Citizen Participation Plan outlines the City's policies and procedures for obtaining public input in the planning and decision-making processes associated with these HUD grants. These citizen participation policies and procedures shall also be followed for the City's Fair Housing Assessment and any application for additional funding through the HUD Section 108 Loan Guarantee Program.

The first section of this guidance provides background on the planning and reporting processes the City will undertake throughout the program year. The second section of this guide describes the various ways the City will go about obtaining citizen input during each process, including conducting direct outreach to interested parties, providing public notice, holding public hearings, publication of proposed and final documents, and requesting public comment. The third section outlines the process the City will follow regarding complaints. The final section outlines the City's anti-displacement and relocation policy.

It should be noted that the federal programs covered by this guidance are designed to primarily benefit "low and moderate-income" persons, who are defined as those earning less than 80% of the area median income. Given this, these policies and procedures will focus on gathering input and feedback from this demographic and other populations specifically identified by HUD, including minorities, non-English speaking persons, and persons with disabilities. In regard to non-English speaking persons, the City has conducted a Four-Factor Analysis to identify Limited English Speaking Persons (LEP). According to the 2013 5 Year ACS Estimates prepared by the U.S. Census, Spanish speakers account for 89% of LEP persons in the City and were the only group of LEP persons of significant size. Based on this analysis, the City will ensure that outreach materials are available in Spanish and that translators are made available during public meeting and hearings.

Annual Schedule of Outreach for Planning and Reporting

The schedule of citizen outreach and opportunities for participation is included below. Details about each outreach component, like public hearings and public notice, are included below.

Month	Outreach and Consultation Efforts
January	1 st -30 th : 30 Day Public Comment Period for Con Plan, Annual Plan, AFH Public Hearing on Proposed Plan
February	15 th : Deadline for submission of Annual Plan to HUD
March	31 st : End of Program Year
April	1 st : Start of Program Year
May	
June	1 st – 15 th : 15 Day Public Comment Period for Annual Report to HUD 30 th : Deadline for submission of Annual Report to HUD
July	
August	Notice of Funding Availability
September	Technical Assistance Workshop
October	
November	Consultations with local partners
December	Notice of Publication of Plan

Planning Processes

Every five years, the City is required to draft a Consolidated Plan. The Consolidated Plan includes an assessment of community needs related to community development, homelessness, and affordable housing. The Five Year Plan also sets forth a number of strategies that the City will follow to address those needs deemed to be high priorities. Each year, the City is required to create an Annual Action Plan that budgets available resources to projects that will meet the goals set forth in the Five Year Consolidated Plan.

The City will prepare an Assessment of Fair Housing (AFH) a year before its Consolidated Plan. The AFH is a separate document that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals to increase fair housing choice. Fair housing choice means that individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers.

These documents will guide the City's actions and use of federal resources for a five year period. It is important for the City to receive quality citizen input on both the Consolidated Plan and the Assessment of Fair Housing. In regard to the Consolidated Plan, citizen input is helpful on the needs assessment and the strategic plan. It is also important for the City to conduct thorough outreach and receive input from the community as part of the AFH. Outreach itself can help increase the level of fair housing choice within the City. Citizen input can help identify sources of discrimination. It is especially important to receive input from members of the protected classes under the Fair Housing Act, including race, color, religion, sex, familial status, national origin, or disability.

The City will take the following actions to encourage citizen input in the planning process:

- **Notice of Resources and Expected Activities**
The City will publicize the amount of assistance the City expects to receive, including any program income expected to be generated, and the type of activities it plans to undertake. The City will also estimate the amount of funds that will benefit persons of low- and moderate-income. The notice will provide instruction to non-profits and other interested parties on how to apply for available funds.
- **Targeted Outreach**
The City will provide a schedule of the planning process, including key dates such as public hearings, publication of the proposed plan, and comment periods, to the following groups:
 - Interested Parties List
 - Public Housing
 - Hammond Hispanic Community Committee
 - Neighborhood Watch
 - Disabilities Commission
 - Hammond Human Relations Commission
- **Technical Assistance Workshop for Interested Parties**
The City will hold a workshop for non-profits and other interested parties to explain the federal programs, the goals of the City, how to complete the City application, and what will be expected

of organizations that receive awards.

- **Consultations**

The City will schedule meetings or hold focus groups with local non-profits, businesses and government agencies working in the fields of community development, affordable housing, and homelessness to identify ways to improve coordination and if needs have changed since the last needs assessment.

- **Publication of Proposed Plan and Data Sources**

The City will post a draft of the proposed plan to its website. The website will also include copies or links to the data sets referenced and analyzed when creating the plans. Summaries and full versions of the plan will be available for review at City Hall in the Community Development Department. A reasonable number of printed summaries will be made available at no cost upon request.

- **Public Comment Period**

The City will hold a thirty day public comment period to receive written comments on the contents of the plan. Any comment received during the public comment period will receive a written response from the City and will be included in the plan submitted to HUD. The City will continue to receive public comments after the end of the comment period, but the City cannot guarantee that comments received after the end of the public comment period will be included in the version of the plan submitted to HUD.

- **Expedited Process for Special Situations**

When the U.S. Department of Housing and Urban Development (HUD) allows for it, the City may use an expedited Citizen Participation process in the cases of natural disasters and other emergency situations that require a shortened process in order to quickly respond to community needs. This may include shortened public comment periods, notifications, and elimination of public hearings. In all cases the City will adhere to guidance provided by HUD for the specific emergency. When conducting the citizen participation process during these special situations, the City will clearly describe in its public notices the ways for citizens to participate in the process and provide comments on proposed uses of funds.

- **COVID-19 Expedited Process**

In spring of 2020, the City received notices that was receiving supplemental allocations of CDBG and ESG funds in order to prepare for and respond to the COVID-19 emergency as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). HUD provided waivers so that the City could conduct an expedited citizen participation process and not have to follow its adopted citizen participation plan.

- **Public Hearing**

The City will hold at least one public hearing during the public comment period to receive oral comments. All comments received at the public hearing will receive a written response from the City and will be included in the plan submitted to HUD.

To ensure effective citizen participation in this special situation, the City will take the following steps:

1) Provide Notice of the proposed substantial amendment to the 2020 Annual Action Plan, the comment period, and the public hearing on the City's website at: <http://www.gohammond.com/notice-of-public-comment-period-2/>

2) Accept comments via the City's website and via email on the proposed plan for a period of five days from August 21, 2020 to August 25, 2020.

3) Hold a public hearing at the Department of Community Development Office on, Monday, August 24, 2020 at 4:00 p.m.

- **Publication of Final Adopted Plan**

After submission to HUD, the City will post the final adopted plan on the City's website.

Amendments

From time to time, the City will need to amend the information contained in one of its plans. Depending on the nature of the change, the amendment will be considered to be a substantial amendment¹ or a minor amendment. Substantial amendments will trigger additional public participation processes outlined below. If an amendment does not meet the definition of a substantial amendment, it shall be considered a minor amendment and will be included in the annual report. Interested parties wishing to comment on minor amendments may do so during the review of the annual report.

¹ In regard to the Assessment of Fair Housing, HUD uses the term "significant material change". For the purposes of this document, the City will use term substantial amendment for "significant material change" to the Assessment of Fair Housing.

Substantial Amendments to the Consolidated Plan or Annual Action Plan

The City will consider the following changes to constitute a substantial amendment to a Consolidated Plan or Annual Action Plan:

- Changes to priorities in how funds are allocated;
- Use of federal funds to undertake an activity not previously described in the action plan;
- Changes in the use of CDBG funds from one eligible activity to another if such changes exceed 10% of the total allocation of the City for the year.

Substantial Amendments to the Assessment of Fair Housing

The City will consider the following as “a significant material change in circumstances” that will require a substantial amendment to the Assessment of Fair Housing:

- Presidential declaration of disaster area that includes the City;
- Significant demographic changes, including a change in population of more than 10%.
- Significant policy changes, including the adoption of an updated Comprehensive Plan or Land Use Plan;
- Significant civil rights findings, determinations, Voluntary Compliance Agreements, or other legal settlements where the City is a party; or
- HUD’s written notification specifying a significant material change that requires an amendment.

Substantial Amendment Process

The City will take the following actions to encourage citizen input for substantial amendments:

- **Notice of Substantial Amendment**
The City will post a draft of the proposed substantial amendment to its website.
- **Targeted Outreach**
The City will provide a copy of the substantial amendment and a schedule of the amendment process, including key dates such as public hearings (if any) and comment periods, to the following groups:
 - Interested Parties List
 - Public Housing
 - Hammond Hispanic Community Committee
 - Neighborhood Watch
 - Disabilities Commission
- **Public Comment Period**
The City will hold a thirty day public comment period to receive written comments on the contents of the substantial amendment. Any comment received during the public comment period will receive a written response from the City and will be included in the substantial amendment submitted to HUD. The City will continue to receive public comments after the end of the comment period, but the City cannot guarantee that comments received after the end of the public comment period will be included in the submission to HUD.
- **Public Hearing**
The City will hold at least one public hearing during the public comment period to receive oral comments. All comments received at the public hearing will receive a written response from the

City and will be included in the plan submitted to HUD.

- **Submission to HUD**
Upon completion of the public participation process, the City will send a written notice to HUD of the amendment and update the IDIS reporting system accordingly. Letters transmitting copies of amendments will be signed by the Executive Director of the Planning and Development Department.
- **Notice to Public Housing Authority**
For changes to the Assessment of Fair Housing, the City will forward a copy of the amendment to the Hammond Housing Authority so that the agency may reflect those changes accordingly in their planning efforts.
- **Publication of Adopted Substantial Amendment**
After submission to HUD, the City will post the final adopted plan on the City's website.

Performance Reports

The City will prepare an Annual Report at the end of each Program Year (March 31st) called the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER report summarizes the use of funds and evaluates the City's performance in regard to meeting its goals during the program year ending (April 1 to March 31).

- **Request for Citizen Input**
The City will use its website to publicize opportunities that citizens have to comment on the annual report, including the public hearing, the public comment period, and the publication of the draft CAPER report.
- **Targeted Outreach**
The City will provide a schedule of the review process to the following groups:
 - Interested Parties List
 - Public Housing
 - Hammond Hispanic Community Committee
 - Neighborhood Watch
 - Disabilities Commission
 - Hammond Human Relations Commission
- **Publication of Draft Report**
The City will post a draft of the annual CAPER report to its website. Summaries and full versions of the report will be available for review at City Hall in the Community Development Department. A reasonable number of printed summaries will be made available at no cost upon request.
- **Public Comment Period**
The City will hold a fifteen day public comment period to receive written comments on the contents of the annual CAPER report. Any comment received during the public comment period will receive a written response from the City and will be included in the version of the report

submitted to HUD. The City will continue to receive public comments after the end of the comment period, but the City cannot guarantee that comments received after the end of the public comment period will be included in the submission to HUD.

- **Public Hearing**
The City will hold at least one public hearing during the public comment period to receive oral comments. All comments received at the public hearing will receive a written response from the City and will be included in the version submitted to HUD.
- **Submission to HUD**
Upon completion of the public participation process, the City will submit the final version of the CAPER report to HUD and update the IDIS reporting system accordingly. The plan must be submitted within 90 days of the end of the program year.
- **Publication of Final CAPER Report**
After submission to HUD, the City will post the final version of the annual CAPER report on the City's website.

Methods of Citizen Outreach

Public Notice

The main method for providing notice of opportunities to participate in planning and reporting processes will be the City's website at:

www.gohammond.com

The City will publicize all public hearings and comment periods at least ten days ahead of time. This will include the following notices:

- Notice of Resources and Expected Activities
- Notice of Funding Availability (NOFA)
- Notice of Public Hearings
- Notice of Citizen Comment Period

Citizen Outreach

In addition to publishing notice on the City website, the City will directly notify persons on the Interested Parties List. To be included on the Interested Parties List, please call the City's Community Development Department at 219-853-6358. Persons on the Interested Parties List will be contacted regarding all public participation opportunities related to the covered grant programs.

Notice will also be provided to the following groups to directly outreach to minorities, non-English speaking persons, persons living in low and moderate income neighborhoods, and persons with disabilities. Outreach material will be made available in both English and Spanish.

- Mayor's Commission on Disabilities
- Neighborhood Watch Meetings

- Mayor’s Night Out
- Hammond Hispanic Community Committee
- Public Housing Authority
- Continuum of Care
- Hammond Human Relations Commission
- Recently funded subrecipients

Public Hearings

The City will hold two formal public hearings during each program year. The first public hearing will be held during the development of the Annual Action Plan. The second public hearing will be held during the preparation of the annual performance report. These public hearings will be held in City Hall to ensure accessibility for persons with physical disabilities. A Spanish-speaking City staff person will attend all formal public hearings to provide Spanish translation, if necessary. The City will attempt to accommodate translation for other languages and persons with disabilities if a request is made at least three days in advance. If the City cannot accommodate translation, the City will make alternative opportunities available for non-English speaking persons and persons with disabilities to participate.

Publication and Review

The City will post summaries and full versions of each plan and report to its website. A reasonable number of printed copies of plan and report summaries will be available at no cost at the Community Development Department at City Hall, upon request.

The website will also include copies or links to the data sets referenced and analyzed when creating the plans. Primary sources include:

- HUD-provided fair housing data;
- HUD-provided low and moderate income data;
- HUD-provided CHAS/ACS data sets; and
- Supplemental information used by the City in its analysis and funding decisions.

Public Comments

The City will hold two formal public comment periods during the year. The first public comment period will be 30 days in length and will most likely be in the month of January. The comment period will seek comment on the proposed Annual Action Plan². The second public comment period will be 15 days in length and will most likely be in the month of June. The second comment period will seek comment on the performance report and evaluation of the City’s programs.

Written comments received during the two formal comment periods and those received orally at public hearings will receive a written response and will be included in the documents submitted to HUD. The City will accept comments throughout the year outside of the public comment periods, but the City cannot guarantee that these comments will be included in the submitted versions to HUD.

² This public comment period will also seek comment on the Five Year Consolidated Plan and Assessment of Fair Housing if these documents are being prepared for submission to HUD.

Comments may be emailed to millero@gohammond.com or submitted in writing to:

City of Hammond Community Development
ATTN: Ms. Owana J. Miller, Director
5925 Calumet Avenue, Suite #115
Hammond IN 46320

Access to Records

To assure public access to all records, the City will make the following available for review at the Community Development Department, located at City Hall, during normal business hours:

- Current version of the City's adopted Citizen Participation Plan for the last five years;
- Current and previous versions of the Consolidated Plan and Action Plan for the last five years;
- Current and previous versions of Section 108 Loan Guarantee Fund applications and related documents for the last five years;
- Current and previous versions of the Fair Housing Assessment (previously known as the Analysis of Impediments of Fair Housing Choice) for the last five years; and
- Current and previous versions of the annual CAPER performance report for the last five years.

Additional records related to the grant programs may be available for public review. However, it is the City's duty to protect the personal information of their beneficiaries. Requests for records other than those listed above will be subject to City approval and may require a Freedom of Information Act (FOIA) request.

Technical Assistance

During the planning process, the City will hold a workshop for non-profits and other interested parties to explain the federal programs, the goals of the City, how to complete the City application, and what will be expected of organizations that receive awards.

In addition to the annual workshop, the City will provide technical assistance upon request to groups and organizations that serve low and moderate income persons within the City. To request technical assistance, please call the City Community Development Department at 219-853-6358.

Complaints

Any complaint regarding the City's planning efforts must be in writing and shall be addressed to Owana J. Miller, Community Development Director. The City will evaluate the merit of each complaint and will make every effort to understand the reasons for such complaints and resolve them as soon as possible. The City will respond in writing to all written complaints within 15 business days of the receipt of the complaint.

Relocation and Displacement

The City will make every effort to minimize relocation and displacement of persons, families, and businesses in activities funded by HUD funds. In this effort, the City will carry out its activities in accordance with the Uniform Relocation Act of 1970, as amended, the applicable federal regulations (49

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CFR Part 24), and the requirements of the Section 104(d) of Title I of the Housing and Community Development Act of 1974, as amended.

When the health and safety concern is an issue, the City will make efforts to assist the property owner(s) in bringing the housing up to Housing Quality Standards, remove such substandard housing, or recommend temporary or permanent displacement of the person(s) residing in them. In such events, the City will provide relocation assistance, to the extent permitted, to the families displaced as a direct result of programs assisted by HUD funds.

Nonetheless, in certain areas identified as urban renewal areas or targeted districts, the City may carry out revitalization initiatives aimed at removing urban blight or foster redevelopments. These initiatives on occasions will require relocation. In such cases, prior to any action that will result in displacement, the City will notify all affected residents of the intended displacement action, as well as the extent of the benefits that will be available to each impacted person as outlined in 42 U.S.C. 4601 and 5304(d), and 49 CFR 24 and the most recent approved State laws.

CITY OF HAMMOND, INDIANA
DEPARTMENT OF PLANNING AND DEVELOPMENT

BY: _____
AFRICA TARVER, Executive Director

DATE: _____

CITY OF HAMMOND, INDIANA
REDEVELOPMENT COMMISSION

BY: _____
TONY HAUPRICH, President

DATE: _____

ATTEST BY: _____

DATE: _____ TITLE: _____