



City of West Allis

Resolution: R-2020-0242

File Number: R-2020-0242

Final Action: 04-29-2020

Sponsor(s): Administration & Finance Committee

Resolution to consider amendments to the Community Development Block Grant Program Citizen Participation Plan.

WHEREAS, as part of the Consolidated Plan process to receive Federal Housing and Community Development funds under the Community Development Block Grant ("CDBG") and HOME Programs from the U.S. Department of Housing and Urban Development ("HUD"), each grantee, such as the City of West Allis (the "City"), is required to develop a Citizen Participation Plan and follow the Citizen Participation requirements; and,

WHEREAS, the CITY is a HUD Entitlement Community under the CDBG program and is a member of a HOME consortium with Milwaukee County and the City of Wauwatosa; and,

WHEREAS, the Citizen Participation Plan provides for and encourages public participation, emphasizing involvement by low and moderate-income people, especially those living in predominantly low and moderate-income neighborhoods, residents of public and assisted housing, and by other low-income residents of target areas in which public and assisted housing is located.

NOW, THEREFORE, BE IT RESOLVED that the Common Council of the City of West Allis hereby amends the City of West Allis Citizen Participation Plan for Community Development Block Grant (CDBG) and HOME Programs in response to the Global Pandemic commonly referred to as COVID-19 allowing for;

- 1) Waiver of the 30-day public comment period to allow for no less than a 5-day comment period.
- 2) Waiver of Federally defined comments and allowing for grantees to determine what constitutes reasonable notice and opportunity to comment.
- 3) Public Hearings may be conducted virtually by the Common Council to obtain public input and comment to an Annual Action Plan or Five-Year Consolidated Plan during the adoption or substantial amendment process.

cc: Department of Development
Housing Division

Dev-R-1014-4-29-20

ADOPTED

APPROVED

Rebecca Grill, City Administrator/Clerk

Dan Devine, Mayor

Exhibit A

CITY OF WEST ALLIS CITIZEN PARTICIPATION PLAN For COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) and HOME PROGRAMS

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Part I. INTRODUCTION

As part of the Consolidated Plan process to receive Federal Housing and Community Development funds under the Community Development Block Grant (CDBG) and HOME Programs from the U.S. Department of Housing and Urban Development (HUD), each grantee, such as the City of West Allis, is required to develop a Citizen Participation Plan and follow the Citizen Participation requirements. These requirements can be found at:

- Section 104 (a)(2) of the Housing and Community Development Act of 1974 and amendments, and,
- 24 CFR 570.486 (a)(6) of the regulations.
- 24 CFR 91.105 of the regulations.

West Allis is a HUD Entitlement Community under the CDBG program. The Department of Development administers CDBG funds on behalf of the City of West Allis and is the staff support for the Community Development Block Grant Committee (the "Block Grant Committee") and the Common Council of the City of West Allis. Department of Development staff develops annual recommendations of new CDBG applications and semi-annual updates to the Block Grant Committee. The Block Grant Committee then recommends an annual CDBG budget to the Common Council, who ultimately approves the budget.

West Allis is a member of a HOME Consortium with Milwaukee County and the City of Wauwatosa. The 5-Year Consolidated Plan (the "Plan") is a comprehensive document that outlines West Allis's goals on a five-year vision to assist low-moderate income persons and address the presence of slum and blight conditions within the community. Because of its status as a member of the Milwaukee County HOME Consortium, West Allis must include its Consolidated Plan for CDBG projects in the Consolidated Plan that is developed and submitted to HUD by Milwaukee County. The County is responsible for development of Consolidated Plan housing goals, objectives and projects.

A. ENCOURAGING PUBLIC PARTICIPATION

This Citizen Participation Plan provides for and encourages public participation, emphasizing involvement by low and moderate-income people, especially those living in predominantly low and moderate-income neighborhoods, residents of public and assisted housing, and by other low-income residents of target areas in which public and assisted housing is located. The City of West Allis welcomes public input through the participation process.

Copies of this Citizen Participation Plan, as well as summaries of basic information about CDBG, HOME, and the Consolidated Planning process are available in the languages of residents who comprise a significant portion of the low and moderate-income population. Currently, West Allis has materials in English. Residents needing materials in other languages are encouraged to contact the City's Department of Development. The City of West Allis has a Limited English Proficiency Policy.

For further information on the LEP Plan, contact Human Resources Director at 414-302-8274 or hr@westalliswi.gov.

The Citizen Participation Coordinator for the City of West Allis is:

Patrick Schloss (Community Development Manager)
414-302-8468
pschloss@westalliswi.gov

Citizens may comment on the contents of this Citizen Participation Plan by submitting written comments to the City of West Allis Department of Development prior to the February 21, 2017, public hearing before the Common Council.

B. STAGES OF THE CONSOLIDATED PLAN PROCESS

The policies and procedures in this Citizen Participation Plan relate to several stages of action mentioned in law or regulation. In general, these stages or events include:

- Public input meetings will be held, seeking citizen, community organization and local government input/comments on housing, public service, infrastructure and community development needs and goals (see Part II.B. below).
- Preparation of the draft use of funds for the upcoming year, known as the proposed Annual Action Plan (AAP); or the development of a new 5-Year Consolidated Plan.
- Review of and recommendation of the proposed AAP and/or 5-Year Consolidated Plan from the Community Development Block Grant Committee to the Common Council of the City of West Allis.
- Formal approval by Common Council of a final Annual Action Plan; and/or 5-Year Consolidated Plan.
- If found necessary, changes may be made to the use of budgeted funds in an Annual Action Plan or change to the priorities established in the 5-Year Consolidated Plan. If the necessary changes meet the substantial amendment definition, a formal Substantial Change Amendment will be published for citizen input and acted upon by Common Council.
- Annual Performance Report known as the Comprehensive Annual Performance and Evaluation Report (CAPER) to HUD at program year completion drafted for public review and comment.

The Community Development Block Grant Committee is a committee appointed by the Mayor of West Allis, with appointments confirmed by the Common Council. The Block Grant Committee oversees and makes suggestions for the use of federal Community Development Block Grant (CDBG) funds received by the City of West Allis from the U.S. Department of Housing and Urban Development.

C. THE PROGRAM YEAR

The program year chosen by the City of West Allis is January 1 through December 31.

Part II. THE ANNUAL ACTION PLAN (AAP) AND 5-YEAR CONSOLIDATED PLAN

The Annual Action Plan ("AAP") is the yearly plan for allocation of CDBG funds. AAPs provide a concise

summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. AAPs operate on a calendar year beginning January 1. Proposals for a year's activities are sought approximately from May through August of the previous year by the following steps. An AAP must be submitted to HUD on or before November 15 of each year.

The 5-Year Consolidated Plan is carried out through the AAP and provides an overall strategy for the use of CDBG and HOME funds over a 5-year period. The Consolidated Plan describes the jurisdiction's community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources.

Part III. COMPREHENSIVE ANNUAL PERFORMANCE AND EVALUATION REPORTS (CAPER)

A CAPER identifies the final budget expenditure and performance results for each Annual Action Plan activity from the currently completed program year and any outstanding activities from prior program years.

The CAPER is submitted to HUD within 90 days after the close of the City's CDBG program year. The City's program year runs from January 1 to December 31. Therefore, the CAPER must be submitted to HUD no later than March 31 of each year although variances do occur.

Prior to submission to HUD, the Department of Development will:

- Publish a notice in the official city newspaper, the City's website and social media outlets announcing that a draft CAPER is available for review, indicate locations where the public may review the draft CAPER, the time period available for review and the date, time and location of a public hearing for the CAPER.
- A legal notice will be published in the official city newspaper advising citizens of a 15-day public comment period prior to submission of the CAPER, beginning around March 15th. Any public comments received during the comment period or at the public hearing will be considered, summarized and attached to the CAPER prior to submission to HUD.

Part II. SOLICITING INPUT

A. CONTENT OF NOTICES

As applicable, notices will include information on the following:

- anticipated funding,
- the range of activities that may be undertaken (detailed information will be available from the City's Department of Development),
- the locations where copies of the entire document may be obtained and where public

- comments and complaints may be submitted,
- a detailed schedule for public hearings.
- Links and hyperlinks to the City’s web site or other web resources.

West Allis will consider any comments or views of citizens received in writing via mail or email, or orally at the public hearings, in preparing the 5-year Consolidated Plan, Annual Action Plan and CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the final document.

B. SOLICITING INPUT FOR THE 5-YEAR CONSOLIDATED PLAN

The City will solicit citizen input on needs and goals for its 5-Year Consolidated Plan by the following steps:

1. Notices will be published, posted and/or provided to the public via:
 - An official newspaper of general circulation serving the City
 - The City’s website at <http://www.westalliswi.gov/>
 - Social media outlets
 - Email using the email Solicitation List maintained by the Department of Development.
 - Official City public notification buildings. These entities will be asked to post the notice in a prominent location available to the public.
 - Citizens may sign up for electronic notifications by using the City’s “Notify Me” sign up at <http://www.westalliswi.gov/list.aspx>.

2. Requests for input and notice of hearings will be sent out specifically to the following:
 - Community organizations that may have an interest in the Plan including, but not limited to: advocacy organizations, social service agencies, homeless service providers, or organizations that work with non-English speaking populations. Organizations should check with the Department of Development to ensure that they are included in the most current list with current contact information including contact name, mailing address, email address and telephone number.
 - Public entities that provide or support affordable housing including the West Allis Public Housing Authority (the Community Development Authority), Milwaukee County Public Housing Authority and others.
 - Private stakeholders including banks, developers, realtors, major employers, colleges and universities, media organizations, Community Housing Development Organizations (CHDOs), Community Development Financial Institutions (CDFIs), and many other special interest organization types.
 - Civic and religious organizations.
 - Institutions such as neighborhood associations that regularly interface with the community.
 - West Allis government departments involved with planning, economic development, health, social services, public works, parks, historic preservation,

- neighborhood revitalization, police, fire, legal and governmental administration.
 - Adjacent governments and governmental entities which may be affected or involved in proposed activities.
3. A request for input will be made to municipal governments participating in the CDBG Urban County and the HOME Consortium, and the Community Development Authority of the City of West Allis.
 4. A request for input will be sent to owners/managers of federally assisted housing.
 5. Citizens will be informed that they can present comments on housing and community development needs and goals:
 - in writing by email or letter addressed to the Department of Development.
 - by attending a public hearing, or,
 - directly to Department of Development staff.
 6. Consistent with regulatory requirements that hearings be held at times and locations convenient to potential and actual Plan beneficiaries, hearings to solicit input on needs and goals will be held in West Allis City Hall or other neighborhood locations.
 7. A summary of the Consortium's draft Consolidated Plan will be published and distributed. A hearing will be held before the Community Development Block Grant Committee, on the draft Consolidated Plan. Pending outcome of the hearing, the draft 5 year Consolidated Plan will be adopted by the Common Council.
 8. The adopted 5-Year Consolidated Plan will be the guide under which proposals for Annual Action Plans are sought and approved.

C. SOLICITING INPUT FOR THE ANNUAL ACTION PLAN (AAP)

The Annual Action Plan (“AAP”) is the yearly plan for allocation of CDBG funds. AAPs operate on a calendar year beginning January 1. Proposals for a year's activities are sought approximately from May through August of the previous year by the following steps. An AAP must be submitted to HUD on or before November 15 of each year or per other direction from HUD.

1. A public input meeting will be held approximately one month prior to publication/notification that the City is seeking AAP proposals, to solicit citizen comments on housing and community development needs, the development of proposed activities, and a review of program performance. Notification locations of this public input meeting are outlined below.
2. Somewhere between May and July, a legal notice will be published (see publication locations below) stating that AAP proposals are being sought for the following year. The notice will include the opening and closing dates for acceptance of proposals.

3. A list of parties who have expressed interest in funding will be maintained by the Department of Development. These parties will be sent a notice at the same time as the publication, that proposals are being sought and accepted beginning somewhere around May or July. A notice requesting proposals will also be sent to community organizations that have expressed an interest in funding under the Consolidated Plan, municipal governments participating in the CDBG Urban County and the HOME Consortium, and the Community Development Authority also alerting them to the opening of the period for proposal requests.
4. Somewhere between July - October, a public hearing will be held before the Community Development Block Grant Committee to receive input on the use of funds under the plan. Notice of this public hearing will be published as outlined below.
5. Somewhere between September - November, the Administration and Finance Committee of the Common Council will review and approve proposals for funding for the upcoming Annual Action Plan. Following this approval, a legal notice will be published in the official city newspaper advising citizens of a 30-day public comment period on the Annual Action Plan.
6. Notices will be published, posted and/or provided to the public via:
 - An official newspaper of general circulation serving the City
 - The City's website at <http://www.westalliswi.gov/>
 - Social media outlets
 - Email using the email Solicitation List maintained by the Department of Development.
 - Official City public notification buildings. These entities will be asked to post the notice in a prominent location available to the public.
 - Citizens may sign up for electronic notifications by using the City's "Notify Me" sign up at <http://www.westalliswi.gov/list.aspx>.

D. SOLICITING INPUT FOR THE COMPREHENSIVE ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

A CAPER identifies the final budget expenditure and performance results for each Annual Action Plan (AAP) activity from the currently completed program year and any outstanding activities from prior program years.

1. By March 31st each year (within 90 days of the end of the program year), West Allis is required to submit a report of the City's progress toward meeting the goals of the adopted Consolidated Plan and Annual Action Plan. This report is referred to as the CAPER.
2. After the development of the draft CAPER, a public hearing will be held by the Community Development Block Grant Committee, reviewing the City's CDBG accomplishments during the previous year. A legal notice will be published in the official city newspaper advising

citizens of a 15-day public comment period prior to submission of the CAPER, beginning around March 15th. Any public comments received during the comment period or at the public hearing will be considered, summarized and attached to the CAPER prior to submission to HUD.

E. PUBLISHING A PROPOSED PLAN

Upon completion of a draft Plan (Consolidated or Action), the City will advise citizens of a draft Plan's availability for review and comment by posting notices in the following:

- An official newspaper of general circulation serving the City
- The City's website at <http://www.westalliswi.gov/>
- Social media outlets
- Official City public notification buildings. These entities will be asked to post the notice in a prominent location available to the public.
- Citizens may sign up for electronic notifications by using the City's "Notify Me" sign up at <http://www.westalliswi.gov/list.aspx>.

Legal Notices: Class I notification published in official City newspaper.

Public Hearing: Class II notification published in official City newspaper.

The notice will include a summary and location of projects of the Plan. The notice will advise that a draft Consolidated Plan/AAP may be reviewed at the Municipal Library, and at the City's Department of Development. Draft Annual Action Plans will be available at the Department of Development.

The published notice will also advise citizens that comments on a Plan will be accepted by the City for 30 days. They must be submitted to the Department of Development.

Part III. HEARINGS for the 5-YEAR CONSOLIDATED PLAN and ANNUAL ACTION PLAN

The City of West Allis follows HUD's citizen participation guidelines for hearings for the Annual Action Plan (AAP) and 5-Year Consolidated Plan with the following steps:

- (1) Publication in City's official newspaper, emails to CDBG "solicitation" list, posting in official City public notification buildings, and social media outlets, seeking public input/ideas in developing goals and projects for the next year's funding and/or the 5-Year Consolidated Plan;
- (2) Public input meeting;
- (3) Publication in City's official newspaper, emails to CDBG "solicitation" list, posting in official City public notification buildings, and social media outlets, notifying the public that the City is accepting/soliciting for applications for the next year's funding and/or information on the 5-Year Consolidated Plan;
- (4) Public hearing at the Community Development Block Grant Committee meeting to consider all

proposals submitted for the next year's Annual Action Plan and/or the 5-Year Consolidated Plan;

- (5) Review/approval of Annual Action Plan and/or 5-Year Consolidated Plan by Common Council;
- (6) Notice of making the Annual Action Plan and/or 5-Year Consolidated Plan available for review and public comment;
- (7) Notice to public of a Finding of No Significant Impact on the Environment.

A. NOTICE OF PUBLIC HEARING:

As applicable, notices will include information on the following:

- anticipated funding,
- the range of activities that may be undertaken (detailed information will be available from the City's Department of Development),
- the locations where copies of the entire document may be obtained and where public comments and complaints may be submitted,
- a detailed schedule for public hearings.

Notices will state that, as required by Federal law, at least 70% of the funds anticipated to be available will benefit low-moderate income persons. In addition, the City will certify that displacement will be minimized and any displacement of residents or business will be undertaken in accordance with the City of West Allis Residential Anti-displacement and Relocation Assistance Plan. A copy of that plan may be obtained by contacting the Department of Development.

Citizens will be advised that they may submit written comments by mail or email, attend a public hearing, or offer input directly to Department of Development staff.

B. PUBLICATION OF NOTICES:

1. Notices of public hearings will be published two (2) times on different days in the City's official newspaper.
2. The first notice will be published no less than two weeks prior to the date of the public hearing.
3. The City will make every effort to inform those who not be reached by the newspaper.
4. All community development related notices will be published or posted in the following locations:
 - An official newspaper of general circulation serving the City

- The City's website at <http://www.westalliswi.gov/>
- Social media outlets
- Official City public notification buildings. These entities will be asked to post the notice in a prominent location available to the public.
- Citizens may sign up for electronic notifications by using the City's "Notify Me" sign up at <http://www.westalliswi.gov/list.aspx>.

C. WHEN PUBLIC MEETINGS AND HEARINGS ARE REQUIRED:

1. A public input meeting and a public hearing will be required each year prior to submission of the 5-Year Consolidated Plan and Annual Action Plan.
2. One public input will be held at the beginning of the planning process to solicit citizen input on needs and proposed projects. A public hearing will be held by the Community Development Block Grant Committee upon completion of the draft 5-year Consolidated Plan/AAP and no later than thirty days prior to the anticipated submission to HUD of the 5-Year Consolidated Plan and/or AAP.
3. The Common Council will hold a public hearing if the City proposes substantial changes to its program that constitute a Substantial Amendment to the 5-Year Consolidated Plan and/or AAP.
4. One public hearing, held by the Community Development Block Grant Committee, must be held prior to submission of the annual CAPER to HUD.
5. All hearings before the Community Development Block Grant Committee and/or Common Council will meet notice requirements as required by this policy and state and local law.
6. All hearings will be conducted in places accessible to the physically disabled.
7. Public hearings will be scheduled on weekdays. If two hearings are held, one will be held in the evening to accommodate those who work during the day and one may be held during the day.

Persons with special needs or disabilities will be accommodated as follows:

- Non-English speaking persons or persons with hearing impairments can be provided an interpreter at public hearings, if a request is made at least seven (7) days prior to the scheduled meeting date.

- Language Line, an over-the-phone interpreter service, has been created to translate English into a variety of languages and is available 24 hours a day, seven (7) days a week.
 - Special accommodations will be made available for persons with physical disabilities at public hearings, if request is made at least (7) days prior to the scheduled meeting date. Meetings will always be held at an accessible site.
8. At the public hearings for the 5-year Consolidated Plan and/or AAP, the following information will be provided:
- Goals and objectives of the CDBG program;
 - Total amount of CDBG funds being made available;
 - Community Development and housing needs;
 - Proposed activities for projects and amounts to be requested for the projects;
 - Proposed amount to benefit low and moderate income residents;
 - Whether any persons will be displaced as a result of the proposed activities.

As appropriate, notices, hearings, and comment periods for the 5-Year Consolidated and Annual Action Plans and performance reports, may be combined.

Part IV. SUBSTANTIAL AMENDMENTS TO A PLAN

Amendments to an approved 5-Year Consolidated Plan or Annual Action Plan (AAP) shall be made consistent with the regulations at 24 CFR 91.505.

Amendments to a 5-year Consolidated or AAP shall be made only after a public hearing is held and a public comment period of 30 days takes place.

Amendments will take place whenever a substantial change is made in allocation priorities, a distribution of funds, or in activities funded by an Action Plan.

For the purposes of amending a Plan, "Substantial Change" is defined:

- By goal: the addition or deletion of a goal to a previously adopted Plan;
- By project: the addition or deletion of a project to a previously adopted Plan;
- By activity: the addition or deletion of an activity to a previously adopted Plan;
- By dollar amounts: a 10% change in annual allocation award when comparing the anticipated annual allocation that had been published in the AAP notification/public hearing vs. the actual annual allocation awarded from HUD;

- By dollar amounts: an increase in funding to an activity of \$100,000 or 100% of the amount originally approved, whichever is greater; or a decrease in funding to an activity of \$100,000 or 100% of the amount originally funded, whichever is greater, but only when the scope of an activity reached less than 75% of its quantifiable outcomes. Department of Development staff may direct the Finance Department to make a non-substantiative change to an activity through a funding change of less than \$100,000 or less than 100% of the amount originally approved, through written directive/communication without the requirement of a public hearing and public comment period. Dollar amounts may increase due to Program Income received and/or a different activity being complete and its unused funds being transferred to an existing activity.
- By scope: any change that reduces by 75% the expected outcome of the services provided by the funding of a particular activity.
- By location: any change in a site-specific location.
- By beneficiaries: any change that reduces by 75% the number of very low or low income persons expected to benefit from an activity.

Part VI. ACCESS TO RECORDS

Citizens, public agencies, and other interested parties may have access to information and records relating to the 5-Year Consolidated Plan, Annual Action Plan, CAPER, and activities carried out under those Plans, as well as information concerning the use of HUD funds in the previous five (5) years. Access will be arranged upon an appointment made during the regular office hours of the Department of Development.

Access to this information does not include confidential data directly related to an individual or business.

Standard documents available will include:

- The proposed and final Annual Action Plans.
- The proposed and final 5-Year Consolidated Plan.
- Proposed and final Substantial Amendments to either an Annual Action Plan or the 5-Year Consolidated Plan.
- Comprehensive Annual Performance and Evaluation Reports (CAPER).
- The Citizen Participation Plan.

Access to other documents must be requested in writing and will be made available at the discretion of the Department of Development.

A limited number of copies of standard documents will be provided to the public within five (5) working days of a request. These materials will be available in a form accessible to persons with disabilities if requested.

Standard documents will be available at the City's Department of Development in City Hall.

Part VII. TECHNICAL ASSISTANCE

Any individuals or groups seeking assistance in understanding the Plans or developing proposals for funding may request such assistance from the Department of Development. Technical assistance will be provided by staff from the Department of Development.

The Department of Development does not prepare a proposal for funding on any individual's or group's behalf.

Part VIII. COMMENTS AND COMPLAINTS

The scheduled public hearings described in this Citizen Participation Plan are designed to facilitate public participation in all phases of the Community Development Block Grant process. Citizens are encouraged to submit their views on all aspects of programs during review and comment periods and public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the Community Development Block Grant Program on a continuous basis, citizens may, at any time, submit written comments or complaints to the City of West Allis Department of Development.

Citizens or groups desiring to comment or object to any phase of the planning, development, approval or implementation process of the 5-Year Consolidated Plan, AAP, amendments, CAPER or CDBG activities should submit such comments or objections in writing to the City of West Allis Department of Development.

Comments or complaints should be submitted writing either via mail or email. Residents who desire proof of receipt must submit their document by U.S Mail with a return request card or by or a similar entity that documents receipt. It is not the City's responsibility to document delivery or receipt of comments or complaints.

Department of Development staff will make every effort to provide written or emailed responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable.

Submit comments and/or questions to:

City of West Allis

Department of Development, Director
7525 W Greenfield Ave
Room 220
West Allis, WI 53214

(414) 302-8460
Fax: (414) 302-8401
Email: development@westalliswi.gov

Should, after a reasonable period, a party believe the comment or complaint has not been properly addressed or considered, then the aggrieved may appeal his/her case to the City Common Council.

Citizens may, at any time, contact HUD directly to register comments, objections or complaints. However citizens are encouraged to attempt to resolve any complaints at the local level as outlined above prior to contacting HUD. Many decisions regarding these Plans and programs are local decisions and HUD can only resolve issues that involve a violation of Federal law or regulation or discrimination.

All comments or complaints submitted to HUD should be addressed in writing to:

U.S. Department of Housing & Urban Development
Attn: Office of Community Planning and Development
310 West Wisconsin Ave
Milwaukee, Wisconsin 53203

Comments or complaints that desire proof of receipt must submit the document by U.S. Mail with a return request card or by FedEx or a similar entity that documents receipt. It is not the Department of Housing and Urban Development's responsibility to document delivery or receipt of comments or complaints. The HUD Office will respond to all written complaints within fifteen days (15) of receipt.

Comments or complaints regarding Consolidated Plan documents prepared by the City of Wauwatosa or Milwaukee County shall be addressed by these entities.

Part VIII: REFERENCES

- eCon Planning Suite Citizen Participation and Consultation Toolkit:
<https://www.hudexchange.info/consolidated-plan/econ-planning-suite-citizen-participation-and-consultation-toolkit/> and
<https://www.hudexchange.info/onecpd/assets/File/eCon-Planning-Suite-Citizen-Participation-Toolkit.pdf>

- Consolidated Plan Final Rule:
http://www.hud.gov/offices/cpd/about/conplan/finalrule_bookview.doc
- Citizen Participation in the Community Development Program (this is an old resource, 1976, but still posted and referenced by CPD):
http://www.hud.gov/offices/cpd/about/conplan/pdf/Guidebook_Citizen_Participation.pdf

ATTACHMENT I: ANTI-DISPLACEMENT POLICY

The U.S. Department of Housing and Urban Development requires grantees of CDBG funding to develop and adopt an Anti-Displacement Policy applicable to CDBG-assisted activities. The City has adopted an Anti-Displacement Policy through Attachment I of the Citizen Participation Plan for Community Development Block Grant (CDBG) Programs. The City will make every attempt not to displace individuals or families as a result of projects funded with CDBG funds. The City will replace all occupied and vacant occupiable lower income housing that is demolished or converted to a use other than lower income housing in connection with a project assisted with federal block grant funds.

All replacement housing will be provided within three years after the commencement of the demolition or conversion. Before entering into a contract committing the City to provide funds for a project that will directly result in demolition or conversion, the City of West Allis will make public by publication in a newspaper of general circulation and submit to HUD the following information in writing:

- A description of the proposed assisted project.
- The address, number of bedrooms, and location on a map of low income housing that will be demolished or converted to a use other than low income housing as a result of an assisted project.
- A time schedule for commencement and completion of the demolition or conversion.
- To the extent known, the address, number of bedrooms, and location on a map of the replacement housing that has been or will be provided
- The source of funding and a time schedule for the provision of the replacement housing.
- The basis for concluding that the replacement housing will remain low income housing for at least 10 years from the date of the initial occupancy.
- Information demonstrating that any proposed replacement of housing units with smaller dwelling units (for example, a two bedroom unit replaced with two one bedroom units) is appropriate and consistent with the housing needs and priorities identified by the City and included in the Consolidated Plan.

If the specific location of the replacement housing and other required data above is not available at the time of the general submission, the City will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data is available. The Department of Development is responsible for tracking the replacement of lower income housing and ensuring that it is provided within the required time period.

ATTACHMENT II: Limited English Proficiency (LEP) Policy

Limited English Proficiency Policy	Personnel	1400
	1471	1-2
		1/20/04

1.0 PURPOSE:

To describe the general policies of the City of West Allis in regard to providing language access services to persons with Limited English Proficiency (LEP) who are eligible to be served or likely to be directly affected by our programs and/or services.

2.0 ORGANIZATIONS AFFECTED:

This policy applies to all City of West Allis departments, boards, and commissions.

3.0 POLICY:

It is the policy of the City of West Allis to provide meaningful access to our programs and/or services to persons that are eligible or likely to be directly affected by our programs and/or services.

4.0 REFERENCES:

Title VI of the Civil Rights Act of 1964.

5.0 PROCEDURES:

5.1 DEFINITION

5.1.1 Limited English Proficiency (LEP) - Those who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with program service providers.

5.1.2 Vital Documents - A document, paper or electronic, that contains information that is critical for accessing provider/City services and/or benefit, or is required by law. Vital documents include but are not limited to: applications/registrations; consent forms; letters and notices pertaining to approval, denial, reduction, or termination of services and benefits; letter or notices that require a response from the customer; and documents that inform customers of free language assistance.

5.2 RESPONSIBILITY

5.2.1 It is the responsibility of the Limited English Proficiency Coordinator (LEPC) to administer this policy. The City has appointed the Personnel Manager as the LEPC.

5.3 GENERAL POLICIES

5.3.1 LEP populations will be assessed on an annual basis and the major language groups identified. Based on the findings of the assessment, a plan will be developed to meet the needs of eligible or most likely to be affected populations to assure compliance with the City's LEP policy.

5.3.2 Provide written notice of the right to receive culturally competent oral interpretation necessary to ensure effective communication in the primary language of the LEP language group.

5.3.2.1 Language access statements shall inform LEP clients of their rights as follows:

- 1.) Their right to qualified interpreter services at no cost to them.
- 2.) Their right not to be required to rely on their minor children, other relatives, or friends as interpreters.
- 3.) Their right to file a grievance about the language access services provided to them.

5.3.2.2 Written language access rights will be distributed in the major LEP languages through the following methods:

- 1.) Posting of signs in lobbies and waiting areas.
- 2.) Customer orientations.
- 3.) Statements in appeal notices.
- 4.) Statements in brochures, booklets, outreach, committee agendas, recruitment information and other materials that are routinely disseminated to the public.

5.3.3 Written translation of City vital documents will be provided for each eligible language group that constitutes 5% or 1,000 individuals, whichever is less.

5.3.4 Written translation of all City documents, including vital documents, will be provided for each eligible language group that consists of 10% or 3,000 individuals, whichever is less.

5.3.5 Oral interpreters will be offered to customers in a timely manner free of charge. Services offered to LEP customers will be documented in appropriate records.

5.3.6 Resources and procedures for obtaining oral interpretation and written translation will be made available to program staff.

5.3.6.1 A contact list of agencies that provide oral or written interpretation services will be maintained and updated.

5.3.7 Qualified interpreters and translators will be utilized to provide services. Interpreters and translators will be screened for appropriate training and cultural sensitivity, and will be required to comply with agency confidentiality policies and Code of Ethics when interpreting or translating.

5.3.8 Regular monitoring will be conducted to ensure the City is providing the required services effectively. The monitoring will consist of the annual assessment process as well as a review of complaints/service requests as received.


Adoption:

This Citizen Participation Plan has been adopted by the Common Council of the City of West Allis on

2/21/2017

By 
Dan Devine, Mayor

Dated: 2/28/17

By 
Monica Schultz, City Clerk

Dated: March 2, 2017