

# CHEROKEE COUNTY CDBG PROGRAM

## CITIZEN PARTICIPATION PLAN

(Revised September 2018)

The Consolidated Plan regulations require HUD local government grantees to adopt a Citizen Participation Plan. This Plan reflects Cherokee County's compliance with the HUD requirements for citizen participation in all appropriate HUD grant programs as of January 2009. This Plan contains the required elements listed in the Consolidated Plan regulations at **24 CFR 91.105(b) and 24 CFR 5.158**. The Cherokee County CDBG Program Office conducts the planning and administration for the Community Development Block Grant [CDBG] Program.

### **1. CITIZEN PARTICIPATION:**

Cherokee County has devised specific actions to encourage participation in its housing and community development programs, particularly by persons of low to moderate income [LMI]. Some of the actions include:

- Review of all citizen comments and incorporation of such comments in the Consolidated Plan, as applicable;
- Analyze the impact of Consolidated Plan program activities on neighborhood residents, particularly LMI residents;
- Conduct Needs Assessments and appropriate on-site visits to each proposed project before including it in the Proposed Consolidated Plan;
- Meet with neighborhood groups to inform them about the Consolidated Plan, project eligibility, the program planning process, project selection and funding, and the project implementation process;

Cherokee County will provide a forum for open communication with its residents, particularly LMI persons regarding its HUD funded programs. Cherokee County will strive to increase residents' participation in its housing, community development, and human services programs by providing relevant information so persons/agencies in Cherokee County might benefit from these grant programs. Techniques will include public housing meetings/forums, neighborhood meetings, presentations to civic associations, public hearings, faith-based meetings, newspaper articles and advertisements, e-mail, feature stories, and individual personal contacts.

The cities of Ball Ground, Canton, Holly Springs, Waleska, and Woodstock (participating cities) located within the County elected to participate in the CDBG Program. Cherokee County makes a special effort to provide timely and accurate information about housing, community development and human services program activities to all of Cherokee's participating cities. Numerous meetings are held and written documents are transmitted to all the participating cities. Many of the heaviest concentrations of LMI persons reside within the boundaries of these cities.

### **2. ACCESS TO RECORDS, LOCAL MEETINGS AND INFORMATION:**

Cherokee County will provide reasonable notice for all Public Hearings. Information and records relating to Cherokee County housing, community development, and human services program activities that are

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made available to the public for review and comment, according to the requirements of Federal, State, and local laws.

Each city participating in the Cherokee County CDBG Program provides a forum for local resident input on proposed projects during one or more of its Council meetings. Projects are discussed and approved by the respective participating City Councils prior to submission to the Cherokee County CDBG Program Office.

Notices of public hearings are publicized throughout the County. Two weeks before the public hearings are held, at least one advertisement is placed in the local newspaper of general circulation, the *Cherokee Tribune*. The advertisements are either "display ads" or "legal ads" which appear in the sections of the newspaper most likely to be read by citizens. Additionally, the Cherokee County CDBG Program Office emails all client organizations a reminder as well.

Copies of public hearing notices, descriptive information concerning HUD assisted housing, community development and human services programs, Proposed Consolidated Plan [and any amendments] and Annual Performance Reports are placed in accessible locations [i.e., Cherokee County Administrative Offices, county web site, local city halls, library] in Cherokee County to permit public review and comment. All documentation is maintained in the Cherokee County CDBG Program Office, documenting the opportunities provided to citizens to insure that all meetings, records, documents and related information are made readily accessible to the citizens of Cherokee County.

### **3. CONSOLIDATED PLAN:**

Before Cherokee County approves an amendment to the current Five-Year Consolidated Plan or Annual Action Plan, it provides information including the amount of financial assistance the County expects to receive from HUD, and the type of activities the County expects to undertake (including the amount that will benefit persons of very low and low income), the plans to minimize the displacement of persons and the assistance to be provided to any persons displaced, will be made available to residents, public agencies, and other interested parties.

A summary of the proposed Consolidated Plan Activity will be published in the official local newspaper of general circulation, the *Cherokee Tribune*, and copies of the Proposed Plan will be available at government offices, and/or other public places. The summary will describe the contents and purpose of the Consolidated Plan and will list locations where copies of the Plan can be reviewed. Substantial Amendments to the Plan will be advertised, and copies of each Amendment will also be made available to the general public. As required by HUD regulations, Cherokee County will provide a period of no less than thirty (30) calendar days from the date of public notice to receive comments from local citizens as it relates to each amendment.

Cherokee County will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan, and the County's use of HUD housing, community development and human services assistance, [including all assistance provided to Cherokee County under the CDBG and HOME programs] during the preceding year. Interested parties should contact the CDBG Program Office for such information. Reasonable requests will be satisfied at the time of the request. If more detailed information is desired, which requires compilation of data; such requests will be submitted to the Cherokee County CDBG Program Office in writing.

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### **4. CRITERIA FOR CONSOLIDATED PLAN SUBSTANTIVE AMENDMENTS:**

A Substantive Amendment is any deviation from the Strategic or Annual Action Plan that results in a significant change regarding the specific Goals, Objectives, Outputs, and Outcomes as referenced in the current Consolidated Plan.

Any potential Substantive Amendment to an existing Consolidated Plan shall meet the following criteria and will require an opportunity for public comment:

- A. To make a change in the allocation priorities or a change in the method of distribution of funds;
- B. To carry out an activity using funds from any program covered by the Consolidated Plan (including program income), ***not previously described*** in the Annual Action Plan;
- C. To change the original intent and purpose of an activity which is no longer applicable;
- D. The costs associated with a change in the scope of an activity must increase or decrease by fifty-one percent (51%);
- E. The location of an activity changes to the extent that it does not serve the target population as originally described in the Consolidated Plan.

### **5. ASSESSMENT OF FAIR HOUSING:**

The Assessment of Fair Housing is intended to be conducted prior to beginning development of the Consolidated Plan and should help inform Consolidated Plan priorities, projects, and goals. The County will ensure its AFH is informed by meaningful community participation in the process of analyzing data: identifying fair housing issues and factors contributing to fair housing issues; and developing fair housing goals. In conducting the community participation process, the County will reach out to those populations who have historically experienced exclusion, including racial and ethnic minorities, limited English proficient (LEP) persons, and persons with disabilities. Two hearings will be held during the AFH process, one during development of the AFH and one after a draft has been prepared.

No later than the date of the first public hearing, the HUD-provided data and other supplemental data to be used in the AFH will be made available to residents for review and analysis. This availability of data may include a link to HUD's website where the data can be readily accessed. In the development of the AFH, the County will consult with other public and private agencies including Canton Housing Authority, other assisted housing providers, social service providers (including those focusing services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes), community-based and regionally-based organizations that represent protected class members, organizations that enforce fair housing laws, and regional government agencies involved in metropolitan-wide planning and transportation responsibilities.

Once complete, the draft AFH will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice will include a brief summary of the content and purpose of the draft AFH, the dates of the public display and comment period, the locations where copies of the draft document will be considered for action by the Board of Commissioners, and the anticipated submission date to HUD.

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In the event the County wishes to revise the AFH after approval by HUD, the revised draft will follow the same public process as the first draft of the AFH, involving a hearing to receive feedback on the revised draft, a public comment period of at least 30 days, and formal action by the Board of Commissioners to adopt the revised report before being resubmitted to HUD.

### **6. TECHNICAL ASSISTANCE TO CITIZENS/AGENCIES:**

The Cherokee County CDBG Program Office will continue to provide technical assistance to Cherokee County residents and agencies, particularly to those of very low and low income who request such assistance in developing project proposals, or who request other information (compliance requirements, program performance, funding information, etc.) outlined in the current Consolidated Plan. Project application forms are available and are distributed at no cost to all persons making a request. A “one-on-one” meeting will be arranged for individuals and groups representing such persons when necessary to explain the project eligibility, application and approval process and other implementation requirements. The Cherokee County CDBG Program Office staff will also meet with various non-profit organizations and individuals to provide other specific technical assistance related to housing, community development and human services programs, as requested. In addition, the Cherokee County CDBG Program Office will provide an annual technical assistance workshop for CDBG applicants to answer all questions and provide assistance in application preparation.

### **7. PUBLIC HEARINGS:**

Cherokee County will conduct a minimum of five public hearings annually to obtain citizens comments and concerns and to respond to proposals and questions throughout the program year. The public hearings will be held at different stages of the program year. Where feasible, multiple hearings may be held in conjunction with one another; however, the community participation process that occurs during the development of the AFH cannot replace the separate community participation required in subsequent planning processes, such as the Consolidated Plan. All hearings will be held at locations accessible to people with disabilities. The Public Hearings will be properly advertised and documented and will include a list of attendees as well as any public comments received. Written minutes of the public hearing are available for review during normal business hours.

1. **Needs Assessment Public Hearing:** This hearing will be conducted annually to determine the nature and types of assistance needed to address Cherokee’s priority needs. The Hearing is held at the beginning of the annual planning cycle to solicit input from residents, public housing agencies, and social services organizations on housing, community, and economic development needs. Cherokee County will use the **Needs Assessment** Public Hearing to report to the citizens on prior year performance for its HUD assisted programs. A Summary of the Annual Performance Report (APR) will be available for review by the attendees.
2. **Proposed Projects Review:** A second Public Hearing is normally held at the close of the application cycle. The purpose of this Hearing is to present to the community all of the projects submitted for funding for the year. CDBG Program Office staff present to the public the results of the needs assessment process, including the proposed priorities for housing and non-housing needs, the proposed long and short term objectives for addressing those needs and the resources available for this purpose. In addition, participants are encouraged to provide input on the degree and extent to which proposed applications meet Cherokee County’s priority needs.

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3. **Proposed Consolidated Plan Review:** Using resident input from the second public hearing, Cherokee County will develop a strategic Consolidated Plan, or an Annual Action Plan. Activities proposed for funding with HUD housing and community development funds through Cherokee County will be reviewed and appropriate recommendations will be made to the Cherokee County Board of Commissioners by the CDBG Program staff [with input from the Office of the County Manager and the Community Services Department]. These recommendations will be advertised for public review and comment for 30 days. During this 30-day period a third public hearing will be conducted to provide ample opportunity for public comment. Once this process has finalized the Cherokee County Board of Commissioners will approve The Plan.
4. **Fair Housing Public Input:** At the beginning of the process of developing the County's Assessment of Fair Housing, a public hearing will be held to receive public input on fair housing issues. At this hearing, the County will make available HUD-provided maps and data on fair housing for review and analysis by attendees.
5. **Feedback on the Assessment of Fair Housing:** A second public hearing on the AFH will be conducted during or after the public comment period on the Assessment, during which the County will address identified factors contributing to fair housing issues and proposed fair housing goals and priorities for affirmatively furthering fair housing. After this hearing, the Cherokee County Board of Commissioners will consider adoption of the AFH.

### **8. NON-DISCRIMINATION POLICY/COMPLAINT REVIEW PROCESS:**

It is the policy of Cherokee County to provide equal opportunity for services without regard to race, color, sex, age, national origin, religion, political affiliation, presence of handicap or disability, or familial status.

Persons who feel that they have been discriminated against or who have a complaint pertaining to the Cherokee County Consolidated Plan, Plan amendments, or Annual Performance Report, may file a complaint in writing to:

Cherokee County CDBG Program  
1130 Bluffs Parkway  
Canton, Georgia 30114  
Attn: Laura Calfee, [lcalfee@cherokeega.com](mailto:lcalfee@cherokeega.com)

The complaint must contain the following information:

- (1) Name and address of the person(s) filing the complaint;
- (2) A description of the act or acts considered to be in violation;
- (3) Other available pertinent information which will assist in the review and resolution of the complaint.

Such complaints should be filed within thirty (30) days of the alleged discriminatory act. A written response as to the disposition of the complaint will be issued by the Director no later than fifteen (15) working days following receipt of the complaint. A person who is dissatisfied with the response to complaint, or if the response is delayed more than fifteen (15) working days, may appeal in writing to:

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Cherokee County Government  
1130 Bluffs Parkway  
Canton, Georgia 30114  
Attn: Mr. Jerry Cooper, County Manager

A written response on the disposition of the complaint will be issued by the County Manager not later than (30) working days following the receipt of the complaint. If the complainant is dissatisfied with the response of the County Manager, he/she may submit the complaint, in writing, to:

United States Department of Housing and Urban Development  
Georgia State Office of Community Planning and Development  
Five Points Plaza  
40 Marietta Street, N. W., 15<sup>th</sup> Floor  
Atlanta, GA 30303-9812

No person shall intimidate, threaten, coerce, or discriminate against any person because he/she has made a complaint, testified, assisted, or participated in any matter in an investigation, proceeding, or hearing related to a complaint.

The identity of complainants shall be kept confidential, except to the extent necessary to carry out or conduct investigations, hearings, or judicial proceedings in any matter in an investigation, proceeding, or hearing related to a complaint.

### **9. CITIZEN COMMENTS:**

Cherokee County will consider any comments or views of residents, agencies, or other interested parties received in writing or orally at Public Hearings, in preparation of the final Consolidated Plan, amendments to the Plan, or the Annual Performance Report. A summary of these comments will be included in the final **Consolidated Plan, Annual Action Plan, Assessment of Fair Housing or Annual Performance Report** [CAPER].

### **10. PROVISIONS FOR SPECIAL NEEDS:**

Arrangements will be made to provide assistance to those with special needs. Anyone who desires provisions for special needs may contact the CDBG Program Office prior to the public hearings so that adequate arrangements can be made. Hearing impaired and other disabled persons who wish to participate in Public Hearings, and who need to have a person "sign" for them at the Public Hearing, should have someone contact the CDBG Program Office via phone at (770) 721-7807 or Email: [lcalfee@cherokeega.com](mailto:lcalfee@cherokeega.com) at least five (5) working days prior to the Public Hearing date.