

**CITY OF ROYAL OAK**  
**CITIZEN PARTICIPATION PLAN**  
**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM**

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**INTRODUCTION**

As a Community Development Block Grant (CDBG) entitlement community, the City of Royal Oak is required to adopt a Citizen Participation Plan (CPP) in conformance with the requirements of 24CFR Part 91, Subpart B, Citizen Participation and Consultation (§91.105, and Subpart F, Amendments to the Consolidated Plan (§91.505). The CPP describes the policies and procedures for involving the general public (citizens) in critical planning issues and funding recommendations related to the CDBG program.

Although not required by federal regulations, the City of Royal Oak has established a committee to analyze housing and community development needs. By resolution on January 24, 2005, the Royal Oak City Commission deferred all housing and community development needs analysis to Rehabilitation Board of Appeals. The seven (7) member Rehabilitation Board of Appeals are City of Royal Oak residents appointed by the City Commission. The Commission's intent in the appointment process is to ensure representation of all citizens to the largest extent possible. The Board engages in an annual proposal review process and makes specific funding recommendations to the City Commission. The Board may also provide other input to the City Commission as further defined by City Commission policy. The annual review covers the CDBG program year. The annual program year established by the city for CDBG funds is July 1 through June 30.

It is the policy of the Royal Oak City Commission to afford citizens the opportunity to assist in selecting priorities and otherwise participate in the development of the Consolidated (5 Year) Plan, Annual Action Plan, amendments to the Consolidated (5 Year) Plan or Annual Action Plans, Consolidated Annual Performance Evaluation Reports, Citizen Participation Plan, Analysis of Impediments To Fair Housing, the Request Of The Release Of Funds associated with the Environmental Review Record (ERR), and any other federal documents governed by the above referenced federal citation.

## **PURPOSE**

The CPP has several objectives, including:

- adequately informing citizens (including minority, non-English speaking, disabled, lower-income, and those likely to be affected by program activities) so that they can knowledgeably participate in program planning and development; and can review performance for the programs covered by this plan.
- soliciting views and opinions from the public and community stakeholders, including adjacent communities, regional planning entities, and the State of Michigan concerning housing and community development needs, particularly as they relate to lower-income residents.
- coordinating program development and delivery between public and private entities which provide housing and human services, and between units of government concerning area-wide issues.
- informing citizens of the processes followed in developing and managing the programs covered by the CPP.

## **ENCOURAGING CITIZEN PARTICIPATION**

Citizens are encouraged to participate in the development of the Consolidated Plan, Annual Action Plan, any substantial amendments to the Consolidated Plan or Annual Action Plan, Consolidated Annual Performance Evaluation Report, Analysis of Impediments To Fair Housing, the Request Of The Release Of Funds associated with the Environmental Review Record (ERR), and Citizen Participation Plan. Attention shall be given to encourage the participation of low- and moderate-income persons. Reasonable actions will be taken to encourage participation by all citizens, including minorities, disabled persons, non-English speaking persons, the elderly, and the Oakland County Continuum of Care. The city encourages the participation of local and regional service agencies and institutions in the process of developing and implementing the consolidated plan. The city may also utilize alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance, e.g., use of focus groups, neighborhood meetings, and use of web-based surveys. There is no public housing located in the City of Royal Oak.

## **ADMINISTRATIVE RESPONSIBILITIES AND CONTACT INFORMATION**

The City of Royal Oak is the recipient of all CDBG funds. The City of Royal Oak Community Development Department has responsibility for administration of the Consolidated Plan process, which includes all activities related to development and dissemination of Consolidated Plans, Annual Action Plans, Substantial Plan Amendments, Consolidated Annual Performance Evaluation Reports, Analysis of Impediments To Fair Housing, the Request Of The Release Of Funds associated with the Environmental Review Record (ERR), and Citizen Participation Plan. The Community Development Department administers the CDBG funds and assists

subrecipient organizations and city departments with meeting the reporting requirements set forth by HUD. Additional information may be obtained from the Royal Oak Community Development Department at (248) 246-3280 or [www.romi.gov](http://www.romi.gov)

## **PUBLIC NOTICE**

The City of Royal Oak will provide advanced public notice once any of the following documents is available: the proposed/draft Consolidated Plan, the proposed/draft Annual Action Plan, any proposed Substantial Amendments, the proposed/draft Consolidated Annual Performance Evaluation Report, the proposed/draft Analysis Of Impediments To Fair Housing, the Request Of The Release Of Funds associated with the Environmental Review Record (ERR), and any proposed amendments to the Citizen Participation Plan.

HUD considers two weeks advance public notice to be adequate for the public to permit informed comment. The amount of lead time can also vary, depending on the event. Specific minimum amounts of lead time for different events are described later in this CPP.

Public notices for public hearings on the above-mentioned documents will be published as a display advertisement in a local newspaper of general circulation. Notices may also be posted at City Hall, Royal Oak Public Library, and city's senior center(s), on the city's cable television, radio or website or direct mailings to agencies, neighborhood associations, groups, and individuals. The requirements for publishing will be met by publishing a summary of the above-mentioned documents. Staff will retain all documentation identifying the steps taken to distribute public notice.

## **PUBLIC ACCESS TO INFORMATION**

The City of Royal Oak will provide the public with reasonable and timely access to information and records relating to the data and content of the Consolidated Plan. Documents relevant to the CDBG program shall be made available at the Community Development Department during normal working hours for citizen review upon request. "Standard documents" include the following:

- a) Proposed and final Consolidated Plan.
- b) Proposed and final Annual Action Plan.
- c) Proposed and final Substantial Amendments to either the Consolidated Plan or the Annual Action Plan.
- d) Proposed and final Consolidated Annual Performance Evaluation Report.
- e) Proposed and final Analysis Of Impediments To Fair Housing
- f) The Request For The Release Of Funds associated with the Environmental Review Record (ERR)
- g) Proposed and final Citizen Participation Plan.

The city shall also provide for full and timely disclosure of its program records and information consistent with applicable State and local laws regarding freedom of information, personal privacy, and obligations of confidentiality. These documents include all key documents such as prior applications for funding, letters of denial and approval, grant agreements, other reports required by HUD, all mailings and promotional material, records of hearings, documents regarding other important program

requirements, such as contracting procedures, environmental policies, fair housing and other equal opportunity requirements, and relocation provisions; copies of regulations and issuances governing the program.

In the spirit of encouraging public participation, copies of standard documents will be provided to the public. The city shall make copies of standard documents available at the City of Royal Oak Community Development Department. Also, copies may be available for review at the Royal Oak Public Library reference desk. One (1) free copy will be provided to individual citizens and groups that provide prior request. The city will take all reasonable steps to provide a copy of the standard documents to disabled persons, and non-English speaking persons. The city may also post a free downloadable copy of standard documents on its website, along with other program information concerning funding amounts, eligibility, and compliance with program requirements, notices, and other pertinent information.

## **PUBLIC HEARINGS**

Public hearings will be held at key stages of the process to obtain the public's views and to provide the public with the city's responses to public questions and proposals. Federal law requires that the city hold at least two public hearings to obtain input regarding community needs during the development of a Consolidated Plan, to review proposed uses of funds in each Annual Action Plan, and to review program performance. The public hearings shall be conducted at different stages of the program year.

Public hearings shall be held only after adequate public notice has been provided as described in the "Public Notice" portion of this CPP, including a display advertisement in a local newspaper of general circulation two weeks prior to the public hearing or reduced notification period as defined by HUD. The public notice of the public hearing shall indicate the time and location and include a direct contact at the city for further information. All public hearings will be held at a convenient time and at an accessible location. Non-English speaking or hearing impaired and disabled citizens wishing to attend a public hearing must notify the city at least five (5) days prior to the meeting to arrange translation or interpretive services. The city shall provide such services to the greatest extent possible.

During a declared disaster / emergency or any legislative action or executive order impacting in-person gatherings, the city may utilize virtual or web-based hearings in lieu of in-person hearings. Notice of said meetings will comply with all applicable state laws or executive orders. Any and all reasonable accommodations to allow for public input during a public hearing shall be afforded to interested parties.

## **STAGES OF THE CONSOLIDATE PLAN PROCESS**

The policies and procedures in the CPP relate to five specific stages of action mentioned in law or regulation. These stages include:

- 1) Needs assessment stage  
The identification of housing and community development needs that generally occurs during development of a Consolidated Plan.
- 2) Plan development stage

- Preparation of a draft Consolidated Plan and/or draft Annual Action Plan.
- 3) Approval stage  
The formal approval by the Royal Oak City Commission of the final Consolidated Plan or Annual Action Plan.
  - 4) Substantial amendment stage  
A substantial amendment will be proposed, considered and acted upon with formal approval by the Royal Oak City Commission.
  - 5) Performance review phase  
Preparation and review of the Consolidated Annual Performance Evaluation Report.

## **NEEDS ASSESSMENT STAGE**

The Rehabilitation Board of Appeals shall consider updates to the city's Analysis Of Impediments To Fair Housing and Consolidated Plan. The Analysis inventories existing and potential impediments to housing opportunities within the city. The Consolidated Plan's certification to affirmatively further fair housing requires the city to undertake the Analysis. The Analysis is a precursor to the Consolidated Plan and helps identify the housing market and needs.

The Consolidated Plan, is a plan of three to five years in length, which describes community needs, resources, priorities, and proposed activities to be undertaken under the city's CDBG program, during its effect.

The Community Development Department shall have been the lead agency in the development of these documents. The results of the Needs Assessment stage shall be incorporated into the Consolidated Plan. Staff shall also include a Housing and Homeless Needs Assessment and Housing and Market Analysis in the Consolidated Plan and a Strategic Plan to address these needs.

Because the housing and community development needs of low- and moderate-income persons are so great and so diverse, priorities must be set in order to which needs shall receive the greatest resource allocation. The needs assessment stage is a critical component of the Consolidated Plan.

The City of Royal Oak conducts public meetings to obtain opinions from citizens about the needs and what priority those needs have during the development stage of the Consolidated Plan (every five years). The city may also utilize alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance, e.g., use of focus groups, neighborhood meetings, and use of web-based surveys.

Public meetings about needs will be completed at least 15 days before a draft Analysis Of Impediments To Fair Housing or Consolidated Plan is published for comment, so that the needs identified can be considered by the city and addressed in the draft Analysis Of Impediments To Fair Housing and Consolidated Plan.

## PLAN DEVELOPMENT STAGE

At the beginning of this stage, usually in the fall of each year, the City of Royal Oak shall make available to citizens, public agencies, and other interested parties the following information for their informed participation in the development of the Consolidated Plan and/or Annual Action Plan.

- the amount of assistance expected to be received by the city, including grants and program income.
- the range of activities that may be undertaken, including the estimated amount of funds that will benefit low- and moderate-income persons.
- how the city plans to minimize displacement of persons, and assist any displaced persons, specifically the types and levels of assistance to be made available by itself or by other legally responsible entities, even if no displacement is expected.
- contact information so that interested persons may obtain additional information.

In the fall of each program year, the Community Development Department staff will prepare and distribute an Application for Assistance/Funding to local service agencies and city departments for the upcoming program year's Annual Action Plan. The Annual Action Plan describes the funding levels and activities to be undertaken during the individual upcoming program year for the CDBG program to address the priority needs and objectives as outlined in the Consolidated Plan for the three-to-five year period. The Community Development Department shall maintain a list of local service agencies for distribution. The city realizes that not all service agencies may be directly notified; therefore, the city may also post the application on the city's website. All service agencies are welcome to apply.

City staff will be available to work with organizations representative of low- to moderate-income persons who are interested in submitting an application to fund a CDBG-eligible activity. Assistance will continue to be provided to those agencies in receipt of CDBG funds as they conduct the approved activity. Assistance will also be given to the Rehabilitation Board of Appeals and City Commission to facilitate their roles in the citizen participation process and various stages of the development of the Consolidated Plan, Annual Action Plan, Substantial Amendments, Consolidated Annual Performance Evaluation Reports, Analysis Of Impediments To Fair Housing, and Citizen Participation Plan. Assistance will include meeting arrangements and agendas, communications, and program information.

The distributed application collects information regarding the agency/department, the proposed activity/project, how the activity qualifies under the federal objectives, requested funding levels, anticipated number of persons/households served and past performance, if applicable. The application, in accordance with the Federal Register Notice of 2005, also collects performance outcome measurements for each proposed activity.

The Community Development Department staff will review the applications for eligibility and whether or not the proposed activities meet the objectives of the Consolidated Plan. All submitted applications are public documents and available upon request. Staff shall summarize and present the funding requests to the Rehabilitation Board of Appeals for their consideration at an open public meeting. All public meetings shall include public comment as identified under the "Public Hearings" portion of this document.

Applicants may be required to provide additional information or be present at public meeting to address any questions staff or the Board may have with regard to the proposed activities.

The Rehabilitation Board of Appeals provides citizen oversight to the development of the Consolidated Plan and Annual Action Plan. The Board shall review all submitted applications for consistency with the goals and objectives of the Consolidated Plan and make a final recommendation to the City Commission for its review and formal approval of the Annual Action Plan. All City Commission meetings are open to the general public and provide for public comment, per state law. Prior to final recommendation, the Board shall conduct a public hearing on the proposed Consolidated Plan and/or Annual Action Plan. Publication of notice shall occur at least 15 days prior to the meeting. Copies of the documents shall be available at locations specified in "Public Access to Information".

### **PLAN APPROVAL STAGE**

Based upon the review of proposed activities, the Rehabilitation Board of Appeals shall forward its recommendation regarding the Consolidated Plan and/or Annual Action Plan to the Royal Oak City Commission. The City Commission shall approve the Consolidated Plan and/or Annual Action Plan. All City Commission meetings are open to the general public and provide for public comment as identified under the "Public Hearings" portion of this document.

The city shall provide a period, not less than 30 days, to receive comments from citizens on the proposed Consolidated Plan or Annual Action Plan. All comments shall be incorporated into the Consolidated Plan and/or Annual Action Plan prior to their submittal to HUD for review and approval. Copies of the documents shall be available at locations specified in "Public Access to Information".

### **THE REQUEST FOR THE RELEASE OF FUNDS ASSOCIATED WITH THE ENVIRONMENTAL REVIEW RECORD (ERR)**

In compliance with federal regulations, the city must certify compliance with an environmental review of each CDBG-funded activity prior to requesting that HUD release of the CDBG funds to the city. A Notice Of Intent To Request Release Of Funds includes a fifteen (15) day public comment period as authorized by HUD. During this time, the public is encouraged to review the Environmental Review Record which describes proposed CDBG-funded activities and their effects, if any, on the environment. It will be provided to the public for review as specified in "Public Access to Information".

### **SUBSTANTIAL AMENDMENT STAGE**

The City of Royal Oak shall amend its approved Consolidated Plan and/or Annual Action Plan whenever it makes one of the following decisions:

- 1) To make a change in its allocation priorities or a change in the method of distribution of funds;
  - 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; or

- To change the purpose, scope, location, or beneficiaries of an activity;

Often times proposed changes to an approved Consolidated Plan and/or Annual Action Plan may substantially (defined below) alter the documents to such an extent that public input is required. The city has therefore established the following criteria to define a threshold to require public participation.

Definition of a Substantial Amendment:

- A) Any significant change in priorities, goals and objectives outlined in the Consolidated Plan and/or Annual Action Plan.
- B) One, or several cumulative activity changes to an Annual Action Plan, equal to ten percent (10%) or greater of any CDBG funds or Section 108 loan funds.
- C) To carry out a CDBG-funded activity not previously approved in the Annual Action Plan.

The City of Royal Oak will provide reasonable notice of a proposed Substantial Amendment so that citizens will have an opportunity to review and comment on it. Notice will be made according to the procedures described in Public Notice of this CPP and will allow a 30-day period for public comment or timeframe otherwise determined by federal law. A summary of citizen comments not adopted in response to any proposed Substantial Amendment and the reasons that the views were not adopted shall be included in the Substantial Amendment. Copies of the Substantial Amendment will be made available to the public as indicating in the under "Public Access to Information".

In the event of a declared disaster or emergency, it may be necessary to expedite substantial amendments to the Consolidated Plan and/or Annual Action Plan. These amendments may include funding new activities and/or the reprogramming of funds, including cancelling activities to meet needs resulting from a declared disaster or emergency. Therefore, the city may utilize CDBG funds to meet these needs with at little as a 5-day public comment period, as authorized by HUD, instead of a 30-day public comment period.

With respect to a declared disaster or emergency event, the city may elect to use CDBG funds to address needs not provided for by the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA) or other disaster relief efforts. Funding for disaster relief may not duplicate other efforts undertaken by federal or local sources unless allowed by the federal government. HUD may provide guidance on eligible uses and programmatic procedures.

## **CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT STAGE**

The City of Royal Oak must submit to HUD the Consolidated Annual Performance Evaluation Report (CAPER) after the close of the program year. In general, the CAPER describes the specific use of program year funds and the extent to which funded activities benefit low- to moderate-income persons.

The city shall provide notice of the availability of the proposed CAPER so that citizens will have an opportunity to review and comment on it prior to submittal to HUD. Notice shall be made in accordance with procedures described in Public Notice of this CPP and



will allow a comment period of no less than 15 days prior to submittal to HUD. In preparing the CAPER for submission to HUD, consideration will be given to all comments and views expressed by the public, orally or submitted in writing. Copies of the CAPER will be made available to the public as indicated in the under "Public Access to Information".

### **ANTI-DISPLACEMENT POLICY**

The City of Royal Oak does not plan on displacing any persons as a result of a proposed CDBG-funded activity. If displacement does occur, the City of Royal Oak will abide by the regulations set forth in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

### **COMPLAINT PROCEDURE**

Any and all comments are welcome and will be submitted to HUD with the Consolidated Plan or other reports as required by HUD regulations. In addition, the Planning Department will answer all the questions or comments it receives in writing within 15 working days of its receipt.

Persons wishing to object to the approval of the Consolidated Plan or other reports as required by HUD regulations may make the objections known to the: City of Royal Oak, Community Development Department, PO Box 64, Royal Oak, MI 48068-0064.

### **USE OF THE CITIZEN PARTICIPATION PLAN**

The City of Royal Oak will follow the measures outlined in the CPP in all matters pertaining to its CDBG program, except in cases of public exigency or otherwise as permitted by federal law.

### **AMENDING THE CITIZEN PARTICIPATION PLAN**

This Citizen Participation Plan can be changed only after the public has been notified of intent to modify it, and only after the public has had a reasonable chance to review and comment on proposed substantial changes. Copies of the amendments to the CPP will be made available to the public as indicated in "Public Access to Information". The City of Royal Oak will provide reasonable notice of changes to the CPP so that citizens will have an opportunity to review and comment on it. Notice will be made according to the procedures described in Public Notice of this CPP and will allow an appropriate comment period for public comment as defined by HUD. Amendments may be reviewed by the Rehabilitation Board of Appeals and must approved by the Royal Oak City Commission.