

Stark County
Citizen Participation Plan
Adopted April 19, 2023

I. Introduction

Lead Agency and Background

The Stark County Regional Planning Commission (SCRPC) is under contract with the Board of Stark County Commissioners, the lead agency, to administer the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) and other HUD related programs. The Citizen Participation Plan (Plan) is subject to the requirements of Title 24: Housing and Urban Development Code of Federal Regulations and Part 91: Consolidated Submissions for Community Planning and Development Programs.

The Plan represents the County's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption and implementation of:

- The Citizen Participation Plan (Plan)
- The Consolidated Plan (CP)
- The Annual Action Plan (AP)
- The Consolidated Annual Performance and Evaluation Plan (CAPER)

The Plan may be amended within the submission of the AP, CP or at any time through an amendment process. Upon request, the Plan shall be provided at no cost, in a format accessible to persons with disabilities or language barriers.

County Contacts

The following contact information can be used to request accommodations for meetings, access to information, request information and documents or to provide public comments on the documents discussed in this Plan.

Stark County Regional Planning Commission (SCRPC)

201 3rd Street NE, #201

Canton, Ohio 44702

330.451.7031 or 330.451.7247

DMSheridan@starkcountyohio.gov

LCSnyder@starkcountyohio.gov

Online Access

The County shall post draft and final documents discussed in this Plan on its website at

www.rpc.starkcountyohio.gov.

Effective Date

Following approval of this Plan by the Board of Stark County Commissioners and HUD, the Plan shall be effective until it is amended or otherwise replaced.

II. Encouragement of Citizen Participation

Background

The Plan must provide for and encourage citizens to participate in the development of the CP, substantial amendment to the CP or AP and the CAPER. These requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those persons living in a revitalization area or in a slum and blighted area and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The County shall take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as provided in 24 CFR 91.105, as well as persons with disabilities.

Low to moderate income Individuals (LMI)

The County will actively engage LMIs to participate in HUD funded programs. The County's outreach may include, but not be limited to holding meetings in lower income areas, direct mail to residents of lower income areas, distribution of information to the Stark Metropolitan Housing Authority and agencies providing services to LMIs. In the event of a disaster, the County will follow the guidance issued by HUD.

Non-English Speakers

Reasonable accommodations for people with Limited English Proficient (LEP) shall be made. Residents may contact the SCRPC office five business days prior to a meeting date and request an interpreter be present. Meeting notices and presentation materials will be provided in English and additional languages if requested.

Census data will be analyzed to identify areas where non-English speakers reside. If more than 20% of the County's entitlement population speaks a language other than English, notices and some materials will be translated into that language.

Persons with Disabilities

Meetings shall be made accessible by choosing locations that are ADA compliant and/or virtual, when available. Meeting notices will include contact information for the TTY or [State of Ohio Relay](#) number for those who are hearing impaired. Notices will include the following language:

The County will make reasonable accommodations for sensory-impaired or disabled residents at public meetings. Translation services may be offered upon request and availability. Individuals requiring such accommodations should contact 330.451.7031 or 330.451.7247 five business days prior to the meeting. Ohio Relay can be reached at 800.750.0750 for English or 800.269.0678 for Spanish.

Social Service Agencies and other Organizations

The County shall encourage the participation of local and regional institutions, lower income residents, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations to participate in the process of developing and implementing the CP. Participation shall be achieved through various alternative means, including but not limited

to in person meetings, virtual meetings, surveys, internet-based feedback, phone conversations, social media and focus groups.

Stark County Metropolitan Housing Authority (SMHA)

The County shall encourage, in conjunction with the SMHA, the participation of public housing residents, resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the CP along with other low-income residents of targeted revitalization. The County shall provide to SMHA its affirmatively furthering fair housing strategy, and CP activities related to its developments and surrounding communities so the PHA can make this information available at their public hearing(s) for the PHA Plan. Participation shall be achieved through various alternative means, including but not limited to: in person meetings, virtual meetings, surveys, internet-based feedback, phone conversations, social media and focus groups.

Public Comment

As technology improves, the County shall explore 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.

Public Hearing Notices

The County will publish notices of public hearings, including times, dates and locations, striving for no less than fourteen (14) days prior to the date of the hearing in one newspaper of general circulation. In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearings

In accordance with [24 CFR 91.105\(e\)\(1\)](#), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed CP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance with this Plan. Hearings may be held virtually in order to accommodate those with certain disabilities, long COVID-19 illnesses and without reasonable or affordable transportation.

In the event of a disaster, the County will follow guidance issued by HUD.

Technical Assistance

Technical assistance will be made available by appointment with appropriate staff to assist low- and moderate-income representative groups, agencies or individuals requesting assistance in developing applications/proposals for funding assistance under the CP and/or to provide comments pertaining to documents discussed in the Plan. The County determines the level and types of assistance to be provided at any time based on a number of considerations including, but not limited to staff workloads.

III. The Citizen Participation Plan

Background

The County's Citizen Participation Plan (Plan) outlines the notification procedures by which residents, public agencies and other interested parties will be notified of public hearings and the opportunities available for public to comment on community needs and the documents provided in this Plan. The County shall follow the following procedures below to amend its approved Citizen Participation Plan (Plan).

Amendments

Amendments to the Plan must go through a minimum fifteen (15) day public comment period, including weekends and holidays, after the in person or virtual public meeting. A public hearing is not required but may be held concurrently with the public review of the Consolidated Plan (CP) or Action Plan (AP).

During the public comment period, written or oral comments will be accepted by the County contacts indicated on page 1. Public comments will be considered when feasible and beneficial. The Board of Stark County Commissioners will take action on the Plan after the public comment period.

Edits to the Plan that only update contact information or editorial changes for clarity will not be released to the public for review or comment. In the event of a disaster, the County will follow guidance issued by HUD.

The Plan can be accessed in person at Stark County Regional Planning Commission (SCRPC), 201 3rd Street NE, #201, Canton, Ohio 44702 and posted online at www.rpc.starkcountyohio.gov.

Displacement of Persons

The County does not anticipate any residential displacement to occur in the near future but it is required to set forth plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available.

Should displacement of residents be necessary as a result of funding a project with CDBG or HOME funds, the County shall compensate residents who are displaced in accordance with [HUD Handbook No. 1378, Tenant Assistance, Relocation and real Property Acquisition](#). The handbook can also be located at www.hudexchange.info.

Submission to HUD

A copy of the County's amended Plan including a summary of written or oral comments received during the public review period, the County's responses and proof of compliance with the comment period requirements, will be submitted to HUD. A summary of any comments not accepted and the reasons therefore shall be included.

IV. Development of the Consolidated Plan (CP)

Background

The Consolidated Plan (CP) presents a coordinated approach for addressing the County's housing and community development needs over a five-year period. A new CP is prepared every five years. It combines, in one report, important information about the County's demographics, as well as information on the housing and other community development needs of its residents.

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

Prior to adopting the CP, the County will make available to residents, public agencies, and other interested parties information that includes:

- The amount of assistance the jurisdiction expects to receive, including grant funds, RLF and program income
- The range of activities that may be undertaken
- The estimated amount that will benefit lower income persons
- Where copies of the CP can be examined

Consultations

During the development of the CP, consultations will occur with, but not limited to the following:

- Stark Metropolitan Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDs and their families, and homeless persons
- Community-based and regionally-based organizations that represent members of protected classes
- Organizations that enforce fair housing laws and other public and private fair housing service agencies
- Broadband Internet Service Providers and organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include management of flood prone areas, public land or water resources
- Emergency management agencies
- The Homeless Continuum of Care of Stark County
- Public and private agencies that address housing, health, social service, victim services, employment or education needs of low-income individuals and families; homeless individuals and families, including veterans, youth, and/or other persons with special needs
- Publicly funded institutions and systems of care that may discharge persons into homelessness
- Business and civic leaders

To an extent practicable, the County will consult with the appropriate adjacent units of general local government regarding issues and solutions extending beyond a single jurisdiction. Consultation will include, but not be limited to:

- Adjacent local governments with regard to non-housing community development needs
- Agencies with metropolitan-wide planning responsibilities
- Agencies and child welfare agencies concerned with lead-based paint hazards and identifying housing units in which children have been identified as lead-poisoned

Homelessness Strategy

When preparing the sections of the CP pertaining to the County's homeless strategy and resources available to address homelessness and the needs of the homeless population, the County shall consult with the agencies listed on page 5, above as well as:

- Public and private agencies that address housing, health, social services, victim assistance, employment, and education of LMI and families
- Public and private agencies addressing homeless individuals, families, veterans, youth or persons with special needs
- Publicly funded universities
- Publicly funded institutions that discharge persons into homelessness
- Business and civic leaders

A variety of mechanisms may be utilized to solicit input from entities indicated above. These could include staff participation on coalitions or boards, telephone or personal interviews, mail or online surveys, internet-based feedback, focus groups, virtual meetings and/or consultation workshops.

Public Hearings

In accordance with 24 CFR 91.105(e)(1), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed CP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

Display and Comment Period

The County will present the draft CP, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft Plan will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the CP may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the CP's content and to submit comments, the County shall:

- Publish a summary of the draft CP in one newspaper of general circulation. The summary shall describe the content and purpose of the CP and must include a list of the locations where copies of the entire CP can be examined
- Make a reasonable amount of free draft copies available at the SCRPC office

- Post a link to the draft CP on social media
- Strive to e-mail County stakeholders indicating the draft CP is posted for review and comments

A concise summary of the participation process, public comments received in writing or orally at public hearings and responses to those comments, as well as comments or views not accepted, will be included in the final draft of the CP.

After the public comment period, the draft CP will be presented to the Board of Stark County Commissioners for consideration and formal action.

No less than 45 days before the start of the County's five-year program cycle, the Plan will be submitted to HUD, unless other guidance is provided by HUD.

Hard copies will be made available, at no cost, to those requesting the draft or approved CP by contacting the individuals on page 1, above.

Criteria for Amendments and Substantial Amendments

Pursuant to [24 CFR Section 91.505](#), the County shall amend its approved CP whenever it makes one of the following decisions:

- Makes a change in the allocation priorities or a change in the method of distribution of funds
- Carries out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan
- Changes the purpose, scope, location or beneficiaries of an activity

The County will treat amendments and substantial amendments equally and use the words interchangeably. Any dollar amount or any changes in the AP will be cause for an amendment. Edits to the CP that only update contact information or editorial changes for clarity will not be released to the public for review or comment.

In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearing Notices

The County will publish notices of public hearings, including times, dates and locations, striving for no less than fourteen (14) days prior to the date of the hearing in one newspaper of general circulation. In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearing

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the CP may be received orally or in writing to the contacts indicated on page 1, above.

Public Display and Comment Period

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners.

Comments on the amendment may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the draft amendment's content and to submit comments, the County shall:

- Publish a summary of the amendment in one newspaper of general circulation. The summary shall describe the content and purpose of the amendment and will include where the amendment can be examined
- Make a reasonable amount of free amendment copies available at the SCRC office
- Post a link to the draft amendment on social media
- Strive to e-mail County stakeholders indicating the draft amendment is posted for review and comments

A concise summary of the participation process, public comments received in writing or orally at public hearings and responses to those comments, as well as comments or views not accepted, will be included in the final draft of the CP.

After the public comment period, the draft CP will be presented to the Board of Stark County Commissioners for consideration and formal action.

As technology improves, the County shall explore 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.

In the event of a disaster, the public display and comment period to amend the CP shall be in accordance with guidance released by HUD.

Submission to HUD

Upon completion of the thirty (30) day comment period and formal action by the Board of Stark County Commissioners, the County shall make the amendment public and will notify HUD that an amendment has been made. A letter transmitting a copy of the amendment(s) will be signed by the President of the Board of Stark County Commissioners and will be forwarded by email or direct mail to the County's HUD CPD representative.

Amendment Access

The revised CP will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702 and posted online at: www.rpc.starkcountyohio.gov.

Hard copies will be made available, at no cost, to those requesting the draft or approved CP amendment by contacting the individuals on page 1, above.

V. Development of the Action Plan (AP)

Background

The annual Action Plan (AP) is a component of the Consolidated Plan (CP) and it describes the County's proposed use of CDBG and HOME funds available to address the priority needs and objectives indicated in the CP for each year of the year. The AP is the County's method for distributing funds to subrecipients and areas of the County to which it will direct assistance.

Plan Development

In the development of its AP, the County will follow, to the greatest extent feasible the following process and procedures indicated below.

Public Hearings

In accordance with 24 CFR 91.105(e)(1), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed AP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

The public hearings conducted for Year one (1) AP may be conducted concurrently with the required public hearings for the five (5) year Consolidated Plan.

Display and Comment Period

The County will present the draft AP, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft AP will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the AP may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the AP's content and to submit comments, the County shall publish, in one newspaper of general circulation that includes:

- A brief summary of the draft AP
- Anticipated funding amounts (including PI and RLF if any)
- The dates of public display and comment period
- The locations where copies of the AP can be examined
- How comments will be accepted
- When the AP will be considered for formal action by the Board of Stark County Commissioners
- The submission date to HUD

Hard copies will be made available, at no cost, to those requesting the draft or approved AP by contacting the individuals on page 1, above.

Comments Received

Written comments will be accepted by the contacts indicated on page 1, above. The County will consider any comments or view made either in writing or orally at the public hearing or during the public comment period. In preparing the final AP, a summary of all feedback will be included, and a summary of any comments or views not accepted and why shall be attached and submitted to HUD.

Submission to HUD

Upon completion of the thirty (30) day comment period and formal action by the Board of Stark County Commissioners, the AP will be submitted to HUD no less than 45 days before the start of the next program year. In the event of a disaster, the County will follow guidance issued by HUD.

The AP will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702.

Hard copies will be made available, at no cost, to those requesting the AP by contacting the individuals on page 1, above.

Amendments to the Action Plan

Pursuant to [24 CFR Section 91.505](#), the County shall amend its approved AP whenever it makes one of the following decisions:

- Makes a change in the allocation priorities or a change in the method of distribution of funds
- Carries out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan
- Changes the purpose, scope, location or beneficiaries of an activity

The County will treat amendments and substantial amendments equally and use the words interchangeably. Any dollar amount or any changes in the AP will be cause for an amendment. Edits to the CP that only update contact information or editorial changes for clarity will not be released to the public for review or comment.

In the event of a disaster, the County will follow guidance issued by HUD.

Public Display and Comment Period - Amendments

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the amendment may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the AP's content and to submit comments, the County shall publish, in one newspaper of general circulation that includes:

- A brief summary of the draft AP amendment
- Proposed funding amounts (including PI and RLF), if any
- The dates of public display and comment period
- The locations where copies of the draft amendment can be examined
- How comments will be accepted

- When the draft amendment will be considered for formal action by the Board of Stark County Commissioners
- The submission date to HUD

In the event of a disaster, the public display and comment period to amend the AP shall be in accordance with guidance released by HUD.

Submission to HUD

Upon completion of the thirty (30) day comment period and formal action by the Board of Stark County Commissioners, the County shall make the amendment public and will notify HUD that an amendment has been made. A letter transmitting a copy of the amendment(s) will be signed by the President of the Board of Stark County Commissioners and will be forwarded by email or direct mail to the County's HUD CPD representative.

Amendment Access

The draft and revised AP will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702 and posted online at: www.rpc.starkcountyohio.gov.

Hard copies will be made available, at no cost, to those requesting the approved AP amendment by contacting the individuals on page 1, above.

VI. Consolidated Annual Performance and Evaluation Report (CAPER)

Annually, the County will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME and any additional HUD funding in accordance with HUD requirements.

Public Hearing

The County will present the draft CAPER, in the form of one public hearing, before or during the 15-day comment period. During this time, the draft CAPER will be posted for review and written comment for 15 days prior to action by the Board of Stark County Commissioners. Comments on the CAPER may be received orally or in writing to the contacts indicated on page 1, above.

The County will strive to hold the hearing at a time and location convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public comment and review. Public notice of the display and comment period will be published in one newspaper of general circulation before the comment period begins. The public notice shall include:

- A brief summary of the CAPERs purpose
- The amount of total expenditures
- A summary of the program performance
- The dates of public display and comment period
- The locations where copies of the draft amendment can be examined
- How comments will be accepted
- When the CAPER will be considered for formal action by the Board of Stark County Commissioners
- The submission date to HUD

Comments Received

Written comments will be accepted by the contacts indicated on page 1, above. The County will consider any comments or view made either in writing or orally at the public hearing or during the public comment period. In preparing the final CAPER, a summary of all feedback will be included, and a summary of any comments or views not accepted and why shall be attached and submitted to HUD.

Submission to HUD

The County will be submitted to HUD within 90 days following the end of the County's annual program year. In the event of a disaster the County will follow guidance issued by HUD

CAPER Access

The draft and final CAPER will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702 and posted online at: www.rpc.starkcountyohio.gov.

Hard copies will be made available, at no cost, to those requesting the approved AP amendment by contacting the individuals on page 1, above.

VII. Complaints

Interested parties may register a complaint regarding any aspect of the CDBG or HOME programs by contacting the individuals indicated on page 1, above. All complaints must be in writing. If a person is unable to provide the complaint in writing for any reason, assistance may be provided. Complaints need to include the resident's name, address, daytime telephone number, if applicable, an email address.

All written complaints will receive a timely written response within fifteen (15) business days of receipt. If staff is unable to be compliant with the fifteen (15) day period, the complainant will be notified of an approximate date a response will be provided.