

CITY OF SPARTANBURG, SOUTH CAROLINA

CITIZEN PARTICIPATION PLAN

The purpose of the Citizen Participation Plan is to provide citizens and organizations with a better understanding of the formation and implementation of the City's HOME Investment Partnerships and Community Development Block Grant (CDBG) Fund Programs. This plan will serve as a guide for obtaining citizen input and involving residents, especially low and moderate-income residents, in the development of the consolidated plan, Assessment of Fair Housing, substantial amendments to the consolidated plan and annual action plan, and the performance report.

Additionally, the goals of the plan are:

- To build trust and understanding by providing the residents of the City of Spartanburg the opportunity to express their needs and concerns.
- To develop an ongoing system of communication between the City of Spartanburg and its residents.
- To encourage and assist neighborhood committees and/or associations to represent citizens' interests in negotiations with City governing officials.
- To make City residents fully aware of the HOME Investment Partnerships Program (HOME) and Community Development Block Grant Program (CDBG), its limitations and capabilities, and to provide timely access to information.
- The Citizen Participation Plan will encourage the participation of local and regional institutions, encourage the participation of Continuums of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organization, in the developing and implementing the Assessment of Fair Housing and the consolidated plan.

CONSOLIDATED AND ANNUAL ACTION PLANS

The City of Spartanburg prepares a five-year Consolidated Plan to coordinate the City's activities with those of other public agencies, private non-profit affordable housing providers, Assessment of Fair Housing, and non-housing service providers. The plan identifies specific, prioritized goals and objectives to be met with CDBG, HOME and other federal funds.

Potential projects are identified, evaluated, and prioritized as part of the Needs Assessment process described hereafter. An Annual Action Plan is then prepared to identify the specific activities to be undertaken with the CDBG and HOME grant funds provided in that program year. The City of Spartanburg's program year begins July 1 and ends June 30.

**AMENDMENTS TO THE CONSOLIDATED AND/OR ANNUAL ACTION
PLAN(S) and
ASSESSMENT OF FAIR HOUSING**

HUD requires grantees to submit an amendment to their Annual Action Plan document when there is a substantial change in the allocation priorities or methods of distribution to projects funded with CDBG.

A substantial amendment for CDBG is defined as one of the following:

1. Project deletions or changes made in allocation priorities or methods of distribution that have the effect of changing the funding level of individual CDBG projects identified in the Annual Action Plan by more than 20% of an entitlement jurisdiction's annual funding level;
2. Any new eligible project funded with CDBG not already identified in the Annual Action Plan;
3. Significant changes in the use of CDBG funds from one eligible project to another, in an amount greater than 20% of the annual CDBG allocation.

Substantial amendments to the Assessment of Fair Housing and CDBG funds will be approved by the City Manager and follow a public comment period of no less than five (5) days which will be published in the paper of general circulation. Prior to making any substantial change in its Annual Action Plan(s) and assessment of Fair Housing, the City of Spartanburg will give at least a 5-day notice to inform its citizens, and particularly those who might be affected by the proposed change and to solicit public comment.

Prior to the public notice, any amendment will be documented by the Neighborhood Services Director for her/him to follow through the implementation of the amendment. The City Manager will approve all substantial amendments to the Annual Action Plan. Substantial Amendments to the Consolidated Plan will follow the same procedures as the full submission of a Consolidated Plan and approved by City Council.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

The report identifies the level of progress and accomplishments in meeting the goals and objectives of City of Spartanburg's CON Plan and Annual Action Plan.

NEEDS ASSESSMENT

Ideas for potential projects and/or requests for assistance may be made *at any time* by contacting the Neighborhood Services Director.

Additionally, public hearings will be advertised and conducted in various locations throughout the City including any participating jurisdictions (municipalities) identified under the City's designation as a Metropolitan City. The public hearings will help to:

- Identify types of eligible and ineligible projects; and
- Solicit ideas for potential projects for improving communities/neighborhoods;

The timetable for preparation of the City's Consolidated and/or Annual Action Plan(s) will be reviewed.

ASSISTING CITY RESIDENTS AND COMMUNITY GROUPS

City residents, community groups, and non-profit agencies will be given an opportunity to express their opinions and interests for input into the development of the Home Investment Partnerships Program and Community Development Block Grant Program as part of the Needs Assessment process.

The Spartanburg Housing Authority and other public and non-profit agencies involved in the development and implementation of projects assisting low and moderate income persons will be contacted and encouraged to participate in the development of the Consolidated Plan and Annual Action Plan. These will include agencies and groups that provide health services, fair housing services, services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. Consultations will also be held with state and local agencies regarding data on lead-based paint hazards.

Residents will be encouraged to institute neighborhood/community committees and/or associations. Technical assistance will be provided to these groups by the Neighborhood Services staff as needed and requested.

Technical Assistance will be provided to groups representative of persons of low and moderate income, that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. This assistance will not include the provision of funds to the groups.

If requested and as available, staff members will attend community meetings to disseminate information about the program and to ascertain the needs of the residents in these communities.

CITIZEN’S ADVISORY COMMITTEE

The Neighborhood Services Director has appointed a Citizens Advisory Committee to participate in an advisory role in planning, implementing and assessing the City’s CDBG and HOME programs. The Citizens Advisory Committee is composed of City staff and residents who are experienced at representing the participating municipalities, if applicable, and the current targeted community. The committee must review and make recommendations for the use of CDBG and HOME funds.

PROJECTED ANNUAL SCHEDULE

Needs Assessment Public Hearings for Consolidated Plan	August and September
Agency Consultations for Consolidated Plan	September and October
15 Day Public Review and Comment on CAPER	September
Submission of CAPER to HUD	September 30
Notice of Funding Availability and Request for Proposals	October or November
Applications Due	December or January
Review of potential projects and/or requests for assistance	January to February
Citizens Advisory Committee review and recommendation	March
Public Hearing on proposed Annual Action Plan	February to April
City Council approval of Annual Action Plan	March or April
30 Day Public Review and Comment Period	April to May
Submission of Consolidated Plan or Annual Action Plan to HUD	May 15
Program Year	July 1 to June 30

A thirty (30) day Public Review and Comment Period and two public hearings (at least one online) on Assessment to Fair Housing will be scheduled during the development of an Assessment to Fair Housing. A public hearing can be held at a specific location, online or virtual depending on emergency circumstances or for wide dissemination of information. During emergency situations public comment periods will not be less than five (5) days.

DISSEMINATION OF INFORMATION

- Efforts will be made to inform citizens of Public Hearings to be held throughout the City. No later than the date of the first public hearing, the HUD-provided data and other supplemental data will be made available to residents, public agencies, and other interested parties.
- Notices of Public Hearings will be published on the City of Spartanburg website at least fourteen (14) days prior to the public hearing. Such notice will be placed on the Neighborhood Services Web page. Notices will be published in the local newspaper at least fourteen (14) days prior to the public hearing.
- Staff will review all potential projects and/or requests for assistance for eligibility and prioritization in accordance with the City's strategic plan. This information will then be presented to the City's Citizens Advisory Committee.
- The City will hold a minimum of two (2) Fair Housing hearings during the development of an Assessment to Fair Housing. The purpose of the hearings are to allow the public the opportunity to be informed on the *Fair Housing Act* (Title VIII of the *Civil Rights Act of 1968*).
- The City will hold a minimum of two (2) public hearings each program year to obtain citizens views and respond to proposals and questions. The purposes of the hearings are to allow the public the opportunity to comment on:
 - a. Program Performance
 - b. Housing and Community Development Needs
 - c. Development of Proposed Activities
 - d. Fair Housing
- All Notices shall contain the following statement regarding the City's continuing policies of non-discrimination.

City of Spartanburg does not discriminate on the basis of age, race, color, religion, sex, national origin, disability or familial status in the admission or access to, or treatment or employment in, its federally assisted programs or activities. Assistance will be provided to accommodate the special needs of persons with disabilities upon 24-hour advance request. The Neighborhood Services Director has been designated to coordinate compliance with the nondiscrimination requirements contained in the U.S. Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR Part 8, dated June 2, 1988).

- Public hearings will be conducted at a time and place convenient for area residents on Monday through Friday. A public hearing can be held at a specific location, online or virtual depending on unforeseen emergency circumstances or for wide dissemination of information.

- The City of Spartanburg will post a notice on the Neighborhood Services Web page of the City of Spartanburg’s website and will be published in the local newspaper, and in the following when applicable:
 - Notices to area leaders and agencies to inform their constituents;
 - Distribution of notices in low to moderate income communities;
 - Distribution of notices to Community-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws.
- The locations of all public hearings will be accessible to the handicapped or the announcement of such meeting shall indicate that assistance will be provided to accommodate the special needs of disabled persons.
- A copy of the City’s Consolidated Plan and Annual Action Plans will be made available to download from the Neighborhood Services page of the City of Spartanburg’s website. Copies will be available for review in the Neighborhood Service Department in accordance with the City’s public information policies.
- This Citizen Participation Plan, will be made available in a format accessible to persons with disabilities, upon request.
- Summaries of activities taken under the Citizen Participation Plan and comments received will be included in the Consolidated Plan and Annual Action Plan and the Consolidated Annual Performance and Evaluation Report (CAPER).

ACCESS TO RECORDS

Citizens will be provided with reasonable access to records concerning any current project undertaken with CDBG and HOME funds during the preceding five years. Such access will be provided Monday through Friday between the hours of 8:30 a.m. and 5:00 p.m. in the Neighborhood Services Department which is now located at 440 South Church, Spartanburg, SC and on the City’s website at www.cityofspartanburg.org.

Confidential information protected under the state and federal Freedom of Information laws, such as information concerning personal or business financial statements, earnings, or sources of income may not be made available for public review. Reasonable charges for assembling and copying the requested information, per City policy, will be imposed.

MEETING THE NEEDS OF NON-ENGLISH SPEAKING RESIDENTS

The City uses census data information from Spartanburg County. Less than approximately seven percent (7%) of the population in Spartanburg County is non-English speaking and there are no significant concentrations of non-English speaking residents within the County as determined by the

most current available census data. If ten percent (10%) or more of the potential or actual beneficiaries of a HOME or CDBG project are determined to be non-English speaking, provisions will be made at the appropriate public hearings for translation of comments and documents into the native language of the majority of the non-English speaking residents affected.

Requests to provide an interpreter must be received in the Neighborhood Services Department at least three (3) working days prior to the public meeting for which an interpreter is requested.

DISPLACEMENT

The City attempts to minimize displacement of persons and assists any persons displaced. If displacement should occur, the City will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, and is following a residential anti-displacement and relocation assistance plan required under section 104(d).

COMPLAINT PROCEDURES

All persons who have a grievance concerning any Home Investment Partnerships Program (HOME) or Community Development Block Grant (CDBG) project, whether proposed or existing, are requested to submit their complaints in writing to:

Mailing Address:

Neighborhood Services Department
City of Spartanburg
PO Box 1749
Spartanburg, SC 29304-1749

All letters must be signed and contain the name(s), address(es), and telephone number(s) of the person(s) lodging the complaint.

Persons are welcome to contact the Neighborhood Services Department by telephone at (864) 580-5323. However, before any official action can be taken, a written complaint must be received.

ACTIONS TAKEN TO RESOLVE GRIEVANCES

Upon receipt of an official grievance made in compliance with the above procedure, the Neighborhood Services Department shall forward a copy of the grievance to the City Manager and the City Attorney.

The Neighborhood Services Department will respond to the grievance in writing within fifteen (15) days of the receipt of the grievance. The Neighborhood Services Department will make all official comments concerning the grievance by mail to the party involved with copies forwarded to the City Manager and the City Attorney.

The Neighborhood Services Department will take action concerning the grievance as expeditiously as is feasible. If, however, additional time is needed to respond to the situation, the party will be notified by mail.

Prior to any response to a written grievance which involves federal law or policy, federal HOME and CDBG program guidelines, or federal regulations governing the HOME and CDBG programs, the City of Spartanburg will provide the written grievance and its proposed response to the State Office, U.S. Department of Housing and Urban Development, for review and approval.

APPEAL

If the Neighborhood Services Department's response does not satisfy the complainant, the complainant may appeal to the City Manager. If the complainant is not satisfied by the City Manager's response, the complainant may seek relief in the appropriate court of law.

For Information, please contact:

Martin Livingston
Neighborhood Services Department
P. O. Box 1749
Spartanburg, SC 29304-1749

440 South Church Street, Suite B
Telephone: 864-580-5323
Email: mlivingston@cityofspartanburg.org