

County of Cook, Illinois



Citizen Participation Plan

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Prepared by:

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TABLE OF CONTENTS

SUMMARY

Purpose	3
Regulatory Requirements	3
Administering Agency	3
Governing Body	3
Applicable Funding Sources	4
Geographic Scope	4

STRATEGY NARRATIVE

General Outreach and Engagement Strategy	4
Specific Participatory Opportunities	5
- <i>Programming and Operations</i>	
- <i>Strategic Plans</i>	
- <i>Performance Reporting</i>	
- <i>Amendments</i>	
Minimizing Displacement	10
Access to Records	11
Technical Assistance	11
Public Comments/Complaints	11

APPENDIX 1 - STAKEHOLDER CONSULTATION AND CITIZEN PARTICIPATION

Economic Development Advisory Committee (EDAC) Public Hearing	
• Notices	
• Minutes	
Public Comments and Cook County Responses	

SUMMARY

PURPOSE

Cook County receives annual entitlement funding from the U.S. Department of Housing and Urban Development (HUD). As a Federal formula funding recipient, Cook County is required to prepare and adopt a citizen participation plan that sets forth its policies and procedures for resident participation and stakeholder consultation.

Cook County is committed to a transparent participatory process that engages and sustains the involvement of residents, stakeholders, and other interested parties effectively in planning and decision-making processes through the consistent and timely public release of complete and accurate information.

REGULATORY REQUIREMENTS

This Citizen Participation Plan has been developed in accordance with the applicable Federal regulation of 24 CFR Part 91.105: Citizen Participation Plan; Local Governments. It will be revised periodically as required to fulfill related Federal, State, and/or local funding requirements.

ADMINISTERING AGENCY

The Department of Planning and Development within the Bureau of Economic Development is the designated agency administering HUD funds on behalf of Cook County.

The mission of the Bureau is to lead and promote equitable economic growth and community development. In addition to the Department of Planning and Development, the Bureau includes the following departments: Building and Zoning, and the Zoning Board of Appeals.

The mission of the Department of Planning and Development is to develop sustainable and vibrant urban communities by: “fostering economic opportunities and business development; preserving and expanding the supply of safe, decent, affordable housing; facilitating infrastructure improvements; promoting fair housing; and supporting social services and programs that address the problems of homelessness.”

GOVERNING BODY

Proposed Federally-funded programs and projects are presented to an advisory council, currently known as the Economic Development Advisory Committee (EDAC), and/or the Cook County Board of Commissioners for review and approval prior to HUD submission as appropriate.

The Cook County Board of Commissioners is the governing board and legislative body of the county. It is comprised of 17 Commissioners, each serving a four-year term who are elected from single member districts. Each district represents approximately 300,000 residents. The President of the Cook County Board is the chief executive officer of the County and presides over the meetings of the County Board and directly supervises departments which provide a variety of direct and support services. The President is elected to a four-year term by the voters of the entire County.

The EDAC consists of members who represent economic development, affordable housing, and community development interests, including an emphasis upon the needs of low- and moderate-income households. The members are appointed by the President of the Cook County Board and serve at the will of the President. The Planning and Development Sub-Committee of the EDAC specifically oversees HUD-related programming.

APPLICABLE FUNDING SOURCES

Cook County currently receives Community Development Block Grant (CDBG), Emergency Solutions Grant (formerly known as the Emergency Shelters Grant) (ESG), and HOME Investment Partnerships Program (HOME) funding on an annual entitlement basis from the U.S. Department of Housing and Urban Development (HUD). In addition, the County occasionally receives one-time Federal funding allocations for Presidentially declared economic, health or natural disasters.

Cook County continues to explore and apply for additional Federal funding on a competitive basis. As funding sources change over time, this Citizen Participation Plan will apply to all Federally-funded programs of the Department of Planning and Development, as appropriate.

GEOGRAPHIC SCOPE

Applicability of this Citizen Participation Plan is restricted to the current suburban community membership of the Cook County Urban County and/or Cook County HOME Consortium. Current non-members include Entitlement Communities of 50,000 people or more, within Cook County, that receive CDBG, ESG, and/or HOME funding directly from HUD as well as those that have specifically opted out of the Urban County and/or Consortium.

STRATEGY NARRATIVE

GENERAL OUTREACH AND ENGAGEMENT STRATEGY

This Citizen Participation Plan aims to encourage public participation in the development, implementation, and evaluation of Federally-funded programming. The resident participation and stakeholder consultation processes outlined in this Plan also apply to Federally-required strategic plans and performance reports including but not limited to:

- Consolidated Plan (Con Plan);
- CDBG-DR Plan;
- Annual Action Plan;
- Consolidated Annual Performance and Evaluation Report (CAPER);
- Citizen Participation Plan
- Substantial Amendments (where applicable)
- Analysis of Impediments to Fair Housing Choice (AIFHC)

In accordance with this Citizen Participation Plan, Cook County will:

- Seek broad public input with specific emphasis upon participation by low- and moderate-income persons, particularly those living in areas where Federal funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods, as defined by Cook County;
- Take appropriate actions to encourage the participation of all its residents, including minorities, persons with limited English proficiency, persons with disabilities, and vulnerable populations (i.e. persons or households who are homeless or at-risk of becoming homeless, victims of domestic violence or persons who are HIV/AIDS positive);
- Solicit the participation of local and regional institutions including civic organizations, councils of government (COG), Continuum of Care leadership and membership, planning agencies, philanthropic institutions, financial intermediaries, businesses, developers, non-profit organizations, and other community-based organizations;
- Encourage, in conjunction with consultation with public housing agencies (PHA), the participation of residents of public and assisted housing developments along with other low-income residents of targeted revitalization areas in which the developments are located;
- Make an effort to provide information to public housing agencies (PHA) about programs and projects related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing required for the PHA Plan; and
- 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 including but not limited to electronic surveys and requests for input.

SPECIFIC PARTICIPATORY OPPORTUNITIES

Programming and Operations

Cook County will solicit input from residents and stakeholders at least twice annually on programming and operations via electronic newsletter and/or ongoing website postings, and routine meetings with local and regional stakeholder organizations.

In addition, Cook County may coordinate stakeholder discussions on an as needed basis to provide input related to processes and documentation, which supplement the standard grant cycle. These consultations will help to facilitate more meaningful discussion and input as well as ensure better program design.

Strategic Plans

Cook County will make all strategic plans (including but not limited to the Consolidated Plan, Analysis of Impediments to Fair Housing Plan, CDBG-DR Plan, Annual Action Plan, and Citizen Participation Plan) available for public review and comment.

A formal notice of the related public review and comment opportunities will be published in advance in at least one local newspaper with general daily circulation. The same notice will also be published to Cook County's website, and if needed, can be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. This notice will be posted in both English and Spanish and will include a brief description of the purpose and contents of the related plan as well as a summary of locations and methods for access and review.

Strategic plans will include the amount of assistance Cook County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income where applicable.

Draft documents will be published to Cook County's website with the option to be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. In addition, a hard copy of the draft documents will be maintained at Cook County's offices and made available for public review as requested. A reasonable number of free copies of the draft documents will also be provided to those residents and groups that request it. The draft documents will be made available in a form accessible to persons with disabilities, upon request.

A public review and comment period of no less than thirty (30) days will apply unless otherwise specified under the pertinent Federal regulation. A summary of comments received orally or in writing, identifying the comment source and content, as well as Cook County responses (including those comments or views not accepted and the reasons therefor) will be included in the final document submittal to HUD or other agency as required.

At least one public hearing will be conducted in relation to all draft documents unless otherwise specified under the pertinent Federal regulation. The hearing will be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. Translation will be providing during the public hearing where a significant number of persons with limited English proficiency are reasonably expected to participate and as specifically requested. When there are concerns about significant public health risks that may result from holding in-person public hearings, a virtual public hearing may be held that allows questions in real time with answers coming directly from the members of the EDAC, and/or staff from the Department of Planning and Development, and/or Cook County Board as appropriate.

This hearing will serve as one of two Federally-required public hearings annually to obtain public input. Together, these public hearings will address an assessment of housing, community, and economic development needs, development and implementation of proposed

programs/projects, and analysis of performance. At a minimum, this particular hearing will cover the Draft Annual Action Plan. These public hearings will be conducted by the EDAC, and/ or staff from the Cook County Department of Planning and Development, and/or Cook County Board as appropriate. Specific program/project approval will be solicited from one or both governing bodies as required under the applicable Federal regulation.

Performance Reporting

Cook County will make all performance reports (including but not limited to the Consolidated Annual Performance and Evaluation Report) available for public review and comment.

A formal notice of the related public review and comment opportunities will be published in advance in at least one local newspaper with general daily circulation. The same notice will also be published to Cook County's website and can be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. This notice will be posted in both English and Spanish and will include a brief description of the purpose and contents of the related report as well as a summary of locations and methods for access and review.

Performance reports will include the amount of assistance Cook County actually received (including grant funds and program income) and the range of activities that were undertaken, including the actual amount that benefited persons of low- and moderate- income where applicable.

Draft documents will be published to Cook County's website and can be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. In addition, a hard copy of the draft documents will be maintained at Cook County's offices and made available for public review as requested. A reasonable number of free copies of the draft documents will also be provided to those citizens and groups that request it. The draft documents will be made available in a form accessible to persons with disabilities, upon request.

A public review and comment period of no less than fifteen (15) days will apply unless otherwise specified under the pertinent Federal regulation. A summary of comments received orally or in writing, identifying the comment source and content, as well as Cook County responses (including those comments or views not accepted and the reasons therefor) will be included in the final document submittal to HUD or other agency as required.

At least one public hearing will be conducted in relation to all draft documents unless otherwise specified under the pertinent Federal regulation. The hearing will be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. Translation will be providing during the public hearing where a significant number of persons with limited English proficiency are reasonably expected to participate and as specifically requested. When there are concerns about significant public health risks that may

result from holding in-person public hearings, a virtual public hearing may be held that allows questions in real time with answers coming directly from the members of the EDAC, and/or staff from the Cook County Department of Planning and Development, and/or Cook County Board as appropriate.

This hearing will serve as one of two Federally-required public hearings annually to obtain public input. Together, these public hearings will address an assessment of housing, community, and economic development needs, development and implementation of proposed programs/projects, and analysis of performance. At a minimum, this particular hearing will cover the Draft CAPER. These public hearings will be conducted by the EDAC, and/or staff from the Cook County Department of Planning and Development, and/or Cook County Board as appropriate.

Amendments

Cook County will make all Substantial Amendments, as applicable, available for public review and comment. A Substantial Amendment shall be required if any one of the following criteria applies:

- Making a change in its allocation priorities or in the method of distribution of funds;
- Carrying 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
- Changing the purpose, scope, location, or beneficiaries of an activity

Please note - the following changes *are not classified* as Substantial Amendments and will be modified internally at the discretion of Cook County:

- Changes to a project budget as follows:
 - For CDBG Capital Improvement projects, changes that are less than \$150,000 or 35% of the original project budget, whichever is more.
 - For projects other than capital improvement projects, such as public service grants, changes that are less than \$35,000 or 35% of the original project budget, whichever is more.
- Modifications to a program or project based upon changing applicable income, rent, subsidy, after-rehabilitation value, and/or purchase price limits and/or utility allowances;
- Changes to a project location when the purpose, scope, and beneficiaries remain essentially the same;
- Transfer of a portion of funds within a project from one approved budget line item to another approved budget line item; and/or
- Modifications to a program or new activities developed in response to a public health emergency or other local, state or federal emergency or disaster declaration. If HUD mandates specific public participation requirements related to an emergency or disaster event, then those guidelines will be followed.

In case of Substantial Amendment, a formal notice of the related public review and comment opportunities will be published in advance in at least one local newspaper with general daily circulation. The same notice will also be published to Cook County's website and can be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. This notice will be posted in both English and Spanish and will include a brief description of the purpose and contents of the related plan as well as a summary of locations and methods for access and review.

Substantial Amendments will detail proposed program and/or project modifications as applicable.

Draft documents will be published to Cook County's website and can be distributed via electronic newsletter along with a request to known stakeholder groups to further publicize via linkage to their respective websites. In addition, a hard copy of the draft documents will be maintained at Cook County's offices and made available for public review as requested. A reasonable number of free copies of the draft documents will also be provided to those citizens and groups that request it. The draft documents will be made available in a form accessible to persons with disabilities, upon request.

A public review and comment period of no less than thirty (30) days will apply unless otherwise specified under the pertinent Federal regulation. A summary of comments received orally or in writing, identifying the comment source and content, as well as Cook County responses (including those comments or views not accepted and the reasons therefor) will be included in the final document submittal to HUD or other agency as required.

At least one public hearing will be conducted in relation to all draft documents unless otherwise specified under the pertinent Federal regulation. The hearing will be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. Translation will be providing during the public hearing where a significant number of persons with limited English proficiency are reasonably expected to participate and as specifically requested. When there are concerns about significant public health risks that may result from holding in-person public hearings, a virtual public hearing may be held that allows questions in real time with answers coming directly from the members of the EDAC , and/or staff from the Cook County Department of Planning and Development, and/or Cook County Board as appropriate.

This public hearing will be conducted by the EDAC, and/or staff from the Cook County Department of Planning and Development, and/or Cook County Board as appropriate. Specific program/project approval will be solicited from one or both governing bodies as required under the applicable Federal regulation.

One or more of the following changes are considered a Substantial Amendment for CDBG-DR funding:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- The allocation or reallocation in excess of \$5 million or greater of a program budget
- A proposed change to an adopted method of distribution

For the CDBG-DR grant, the County must follow a detailed citizen participation plan that satisfies requirements of 24 CFR 91.105 (except as waived by the Universal Notice, published Jan. 8, 2025, as amended.)

MINIMIZING DISPLACEMENT

Cook County will work to minimize all displacement of persons and businesses where feasible.

In instances where temporary or permanent displacement is necessary, Cook County will provide technical and monetary assistance for relocation purposes as required and cost eligible under the applicable Federal regulations. Specific efforts to minimize displacement and provide relocation assistance as needed are outlined in Cook County's Relocation and Anti-Displacement Plan.

ACCESS TO RECORDS

As outlined above, Cook County will strive to provide residents, stakeholders, and other interested parties with reasonable and timely access to information and records relating to the Cook County's Consolidated Plan and the use of assistance under the programs covered during the applicable plan period.

TECHNICAL ASSISTANCE

Cook County will provide technical assistance to individuals and 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 technical assistance does not include the provision of funding but rather consultation and advisement provided on a one-on-one or group basis as deemed reasonable by Cook County.

PUBLIC COMMENTS AND COMPLAINTS

Cook County will provide a timely, substantive written response to every written public comment or complaint, within fifteen (15) business days. Instructions for providing public comments or complaints will be provided in any public notice that is published. Feedback is also always welcome at 312-603-1000 or via email at HOME.RESPONSE@COOKCOUNTYIL.GOV

APPENDIX 1 - STAKEHOLDER CONSULTATION AND CITIZEN PARTICIPATION***Cook County Department of Planning and Development Public Hearing***

Notices
Pending

Minutes
Pending

Public Comments and Cook County Responses
Pending