



CITIZEN PARTICIPATION PLAN

**U.S. Department of Housing and Urban
Development (HUD) Programs**

September 14, 2023

City of Reading Citizen Participation Plan

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Strikethrough-----Section removed as per Executive Order 14151 of January 20, 2025

INTRODUCTION

The City of Reading values the lived experience and ideas of our residents. The City provides equitable and accessible opportunities for community residents to be involved in the planning, implementation, and monitoring of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs.

This Citizen Participation Plan describes the opportunities that local residents and organizations will have to participate in these programs as well as the activities that the City will organize and facilitate to inform and engage local residents in accordance with 24 CFR 91.105 and all other applicable federal regulations. The City encourages citizens to participate in these activities.

The involvement of low- and moderate-income people and people who live in areas designated as low- and moderate-income by the U.S. Department of Housing and Urban Development are especially encouraged to get involved. In the City of Reading, about half of our residents speak Spanish and more than 20% speak English less than very well. Nearly 20% of residents of the City have a disability. The City will take steps to intentionally include these residents in planning, implementation, and monitoring activities.

In addition, the City of Reading encourages the participation of local and regional institutions, the Reading/Berks Continuum of Care (PA-506), businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations, the City of Reading Human Relations Commission, and the Reading Housing Authority including the people impacted by the work of these organizations, staff, and volunteer leadership.

This Citizen Participation Plan and all substantial amendments to this Citizen Participation Plan will be made available to the public for a comment period of 30 calendar days before they are adopted by the City of Reading. The plan will be maintained for public view on the City's website and will be made available in alternative formats, upon request, for people with disabilities. The City will follow this Plan when planning for and organizing opportunities for citizens to participate in planning, implementation, and monitoring of CDBG, HOME, and ESG programs.

PLANNING

The City of Reading will create opportunities for the public to participate in the creation of three types of plans:

- Consolidated Plan
- Annual Action Plan
- ~~Equity Plan~~

Consolidated Plan

The Consolidated Plan is a document that identifies community needs and priorities related to

HUD-funded programs. The City of Reading creates a new Consolidated Plan every five years. The Consolidated Plan is due to HUD 45 days before the beginning of the first program year of the plan.

Annual Action Plan

An Annual Action Plan is prepared each year to identify the uses of anticipated HUD funding. The Annual Action Plan is due to HUD 45 days before the beginning of the program year.

Equity Plan

~~The City of Reading is required to affirmatively further fair housing. Part of this responsibility is creating a five-year Equity Plan that identifies fair housing problems and outlines strategies to address these problems. These strategies are incorporated into the Consolidated Plan and Annual Action Plan. Equity Plan is due to HUD 45 days before the beginning of the first program year of the plan.~~

Planning Guidelines

The City will follow these guidelines when developing any of the above referenced plans:

- As soon as feasible after the start of the public participation process, the City will make HUD-provided data and any other supplemental information the City plans to incorporate into its Consolidated Plan ~~or Equity Plan~~ available to residents, public agencies, and other interested parties. This may be done by cross-referencing to the data on HUD's website.
- A public hearing will be held prior to the development of plans to obtain information from the community about their needs.
- The City will make a draft of all plans available to the public before there are adopted by the city; these drafts will be available at the City's website, the City Community Development office, and the local library.
- A summary of plans will be published in a local newspaper along with a list of locations where copies of the entire documents can be reviewed.
- The City will make a reasonable number of free copies of the plan available to residents and community groups upon request.
- The public will have at least 30 calendar days to review and comment on the Consolidated Plan, Annual Action Plan, ~~and Equity Plan~~.
- The City will consider the comments or views of residents received in writing or orally at public hearings in preparing in the plans. A summary of any comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final plans.

COMMUNITY ENGAGEMENT STRATEGIES

Local citizens and stakeholder groups will be consulted during community development planning, implementation, and monitoring activities. All plans will include:

- A concise summary of the community participation process, public comments, and efforts made to broaden community participation in the development of the plan;
- A summary of the comments, views, and recommendations, received in writing, or orally at public hearings, during the community participation process; and
- A summary of any comments, views, and recommendations not accepted by the program participant and the reasons for nonacceptance.

Opportunities for community engagement include:

- public hearings;
- engaging community partners;
- community meetings and committees; and
- individual citizen contact in the form of comments, complaints, or inquiries submitted directly to the Community Development Department.

Public Hearings

At least two public hearings will be held each year. Additional public hearings may be scheduled throughout the year at the discretion of the Mayor. Public hearings are open to the entire community and will be held at times and locations that are convenient to potential and actual beneficiaries as well as accessible to people with disabilities. The public hearings are televised on a local community access channel. The City will offer accommodations for people with disabilities and for people with limited English proficiency upon request.

The first public hearing will be held during the initial stage of plan development. The purpose of the hearing will be to obtain comments on the citizen participation process and to assess the community development needs of the community. At this meeting, City staff will share the amount of funds available, describe the range of eligible activities, review the performance of activities previously funded in the community, explain the planning process and the schedule for preparation of the plan(s), the role of citizens in development of the plan(s), and a summary of any other important program requirements such as environmental policies, fair housing provisions, and contracting procedures. Some of these topics will be covered in written materials.

The second public hearing will be held upon completion of the draft plan document(s). The purpose of this hearing will be to present the plans that are being proposed, including proposed strategies and actions for affirmatively furthering fair housing, and to provide an opportunity for comment and revision prior to approval by the Mayor and City Council.

Public hearings will be advertised in the local newspaper at least ten (10) business days prior to

the hearing date.

The notice for the first public hearing will include the following information:

- time, date, and location of the hearing
- amount of funding anticipated
- criteria necessary to meet the range of eligible and fundable activities
- percentage or dollar amount committed to low- to moderate-income people
- Any displacement that is expected to occur as a result of the use of HUD funds
- list of potential projects currently identified, if any
- statement that the City will provide technical assistance, upon request, to any groups or people, especially low- to moderate-income people or their representatives, when developing proposals intending to use HUD funds
- the procedure to provide written comments, responses, complaints, or grievances;
- offer of assistance to people with disabilities and people with limited English proficiency; and
- the point of contact

The notice for the second public hearing will include the following information:

- time, date, and location of the hearing;
- amount and types of funds available;
- intention to apply or submit plans;
- summaries of plans to be adopted including funded activities and dollars allocated to each;
- the procedure to provide written comments
- offer of assistance to people with disabilities and people with limited English proficiency; and
- the point of contact

In addition, public hearing notices may be distributed to partners through email and posted on the City's website and social media accounts.

A public comment period of 15 calendar days will follow publication of the notice for the first needs public hearing and a public comment period of 30 calendar days will follow publication of the notice for the second public hearing.

Engaging Community Partners

The City will maintain a list of local nonprofit organizations, faith-based organizations, businesses, government agencies, and other stakeholders to be consulted during planning processes. The City will reach out to these partners when there are opportunities for citizen participation or on an as-needed basis to facilitate the exchange of ideas and expertise.

When developing the Consolidated Plan ~~and Equity Plan~~, The City will consult with several agencies including but not limited to:

- Public and private agencies that provide assisted housing, health services, and social services (including those focusing on services to children, older adults, people with disabilities, people living with HIV/AIDS and their families, people experiencing homelessness);
- Community-based and regionally-based organizations that represent protected class members;
- City of Reading Human Relations Commission and other organizations that enforce fair housing laws;
- Berks Coalition to End Homelessness (Reading/Berks County Continuum of Care PA-506;
- Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families;
- Individuals and families experiencing homelessness, including homeless veterans, youth, and/or other people with special needs;
- Publicly funded institutions and systems of care that may discharge people into homelessness (such as health-care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions);
- Business and civic leaders;
- State or local health and child welfare agencies that maintain data related to lead-based paint hazards and poisonings;
- Adjacent units of local government;
- The Reading Housing Authority, resident advisory boards, and resident councils;
- Regional government agencies, adjacent municipalities, and local government agencies; and
- Agencies with metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

Community Meetings

Community meetings may be held throughout the program year in specific neighborhoods of the City to obtain residents' comments and to answer questions about the program. The Community Development Department staff may contact each member of City Council and offer to make a presentation similar to the first public hearing within their district.

~~At least three community meetings will be held when an Equity Plan is developed. These meetings will be held in neighborhood locations at a variety of times to be accessible to people most likely to be impacted by fair housing issues.~~

Informal, Individual Contact with Citizens

Informal, individual contact with citizens will be encouraged and initiated either by citizens or program officials to receive input.

The City will continue to follow the Interested Party Notification process for projects subject to

environmental review. Under that process, agencies, organizations, and individuals specifically requesting to receive environmental notices for funded activities will be included on a mailing list.

Citizens are welcome to submit comments on all aspects of program performance throughout the year. Comments should be submitted in writing to the Director of the Community Development Department. The Director will respond in writing within fifteen (15) business days. If the response is unsatisfactory, the citizen should write directly to the Mayor. The Mayor will respond within fifteen (15) business days. If the citizen is still dissatisfied, they will be directed to contact the HUD Regional Office in Philadelphia.

Additional Community Engagement Techniques

Additional community engagement techniques may be used to facilitate the development and implementation of a shared vision for change in the City of Reading. These techniques may include:

- posting opportunities for engagement on the City of Reading's social media accounts;
- distributing email notices to partners;
- holding focus groups or interviews to obtain the views of citizens and stakeholder groups on specific topics;
- distributing surveys to understand the needs of citizens and stakeholder groups; and/or
- providing a video and/or teleconferencing option to expand opportunities for participation in public meetings.

Language Access

The City of Reading provides meaningful access to all planning, implementation, and monitoring activities for people who do not speak English as their primary language and who have a limited ability to speak, read, write, or understand using the English language. Once a year, the City of Reading conducts a four-factor analysis to determine the language needs of our residents and, when needed, updates our Language Access Plan to ensure that all residents have the opportunity to fully participate in programs, services, planning, and monitoring activities.

If requested, City staff will provide translation or interpretation services for residents who speak Spanish. All public hearing notices will encourage people who do not speak English to request this assistance if needed.

All opportunities to provide input to the City in relation to its HUD program planning will be available to people who speak Spanish. Outreach materials will be published in both English and Spanish when feasible. The City will include local Spanish media and community partners that primarily serve people who speak Spanish in its outreach efforts. Surveys will be published in both English and Spanish. Focus groups and interviews will be conducted in Spanish when needed.

Access for People with Disabilities

The City of Reading provides meaningful access to all planning, implementation, and monitoring activities for people with disabilities in accordance with Section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR part 8; and the Americans with Disabilities Act and the regulations at 28 CFR parts 35 and 36, as applicable. Upon request, the City will provide an accommodation so that a person with a disability is able to fully and meaningfully participate in planning, implementation, and monitoring activities. All public hearing notices will encourage people with disabilities to request an accommodation if needed.

CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS

An amendment will be made to the approved Consolidated Plan and/or Annual Action Plan whenever one of the following occurs:

- a change is made in the allocation priorities or the method of distribution of funds;
- an activity is carried out using funds from any program covered by the Consolidated Plan (and any program income) not previously described in the Action Plan; or
- the purpose, scope, location, or beneficiaries of an activity change.

For these amendments, a notice will be published in the newspaper describing the amendment, and a public hearing may be held. Citizen comment will be requested within ten business (10) days of the date of publication. Citizens may review any program amendments including budget revisions and program modifications at the Community Development Department, third floor, City Hall or at the Reading Public Library (main branch) during normal hours. A copy of the amendment will be submitted to HUD.

A **substantial** amendment will be required in the event that the City makes application for federal funding for an activity or priority that is not described in the Plan.

For a **substantial** amendment, a notice will be placed in the newspaper outlining the amendment and asking citizens to comment. Citizens will be given at least thirty (30) calendar days to comment on a proposed substantial amendment prior to the amendment being implemented as part of the Plan. Citizen comments made in writing or orally at public hearings will be considered when preparing the substantial amendment to the Plan. Upon completion of the citizen participation process, the amendment will be made part of the Plan and the City will notify HUD that an amendment has been made. A summary citizen comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the substantial amendment of the Plan.

EQUITY PLAN REVISIONS

~~An Equity Plan previously accepted by HUD must be revised and submitted to HUD for review under the following circumstances:~~

- ~~● A material change occurs (a change in circumstances that affects the information on which the Plan is based to the extent that the analysis and fair housing goals no longer reflect actual circumstances, including a Presidentially declared disaster that is expected to result in additional federal funding under title IV of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.); or~~
- ~~● Upon the Responsible Civil Rights Official's written notification specifying a material change that requires the revision.~~

~~The City may decide to revise and submit an updated Equity Plan to HUD for review under the following circumstances:~~

- ~~● Changes that significantly impact the steps the City may need to take to affirmatively further fair housing such as a fair housing goal established in the Plan cannot be achieved;~~
- ~~● Significant demographic changes;~~
- ~~● New fair housing issues;~~
- ~~● Short term fair housing goals have been achieved;~~
- ~~● Civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders are entered; or~~
- ~~● The City advises HUD of a change that similarly may merit the submission of a revised Plan, and HUD grants the City permission to submit a revised Plan by a specific date for HUD review.~~

~~A revision may not necessarily require the submission of an entirely new Plan and the City may focus only on the change and the appropriate and necessary adjustments to the analysis and fair housing goals, but the City will conduct community engagement activities related to the amended portions of the Plan. The revision will follow the guidelines for public hearings and notification in this plan.~~

~~When a revised Plan is required, it will be submitted to HUD within 12 months of the material change; however, if the material change is a Presidentially declared disaster, it will be submitted within 2 years of that declaration.~~

~~When the City elects to revise its plan, a Responsible Civil Rights Official will set a due date.~~

~~The revised Plan will be submitted to HUD and its goals will be incorporated into subsequent Consolidated Plans and Annual Action Plans.~~

ANNUAL PERFORMANCE REPORTS

The Consolidated Annual Performance Evaluation and Report (CAPER) for the program will be

submitted to HUD within ninety (90) days of the end of the program year. Public notice will be provided in the newspaper and citizens will have fifteen (15) calendar days to comment on the performance report prior to its submission. All comments received, either orally or in writing, will be considered in preparing the CAPER. A summary of citizen comments will be attached to the CAPER. The CAPER is due to HUD 90 days after the end of the program year.

EMERGENCY DECLARATIONS

Declared disasters, emergency events, including terrorism and infectious diseases may necessitate expedited substantial amendments. If an emergency declaration is made that affects the administration of the existing federal programs authorized under the Housing and Community Development Act of 1974, as amended, the citizen participation requirements will be followed in accordance with either: 1) the statute or regulations set for the program or 2) a waiver request submitted to HUD to alter the citizen participation process in accordance with information provided by HUD.

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), signed into law on March 27, 2020, allows the City of Reading to adopt and use expedited procedures to prepare, propose, modify, or amend its statement of activities to the FY 2019 and FY 2020 grant and new CARES funding related to the use of funding to address emerging COVID-19 response.

As long as national or local health authorities recommend social distancing and limiting public gatherings for public health reasons, the City may, in accordance with federal regulations:

- hold virtual public hearings instead of in-person hearings; and
- reduce timeframes for public notices and opportunities for public comment to no less than five (5) calendar days.

Virtual hearings will provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses." In addition, accommodations for people with disabilities and people with limited English proficiency will be made available to the greatest extent possible.

TECHNICAL ASSISTANCE

Technical assistance will be provided to groups that represent low- and moderate-income residents upon request. The City of Reading will help citizens develop proposals, define policy, and organize for the implementation of the program. Assistance may be provided in the form of staff or local expert presentations, informational handouts, research of a specific issue, or other short-term efforts.

ACCESS TO RECORDS AND DOCUMENTS

The City of Reading will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records relating to the City's current HUD-funded plans and activities as well as for the preceding 5 years.

The Consolidated Plan as adopted, Consolidated Plan substantial amendments, Annual Action Plan, ~~Equity Plan~~, and CAPER will be available to the public on the City of Reading's website. A public file containing plan and program documentation will be available for review at City Hall during normal business hours. Other plan and program documents will be available for citizen review on request at City Hall consistent with applicable federal, state, and local laws regarding personal privacy and obligations of confidentiality. Upon request, these documents will be provided in a form that is accessible to people with disabilities.

ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN

The City will minimize displacement of people and assist any people who are displaced in accordance with its Anti-Displacement and Relocation Assistance Plan.

COMPLAINTS

The City of Reading will accept complaints from citizens or stakeholder groups either verbally or in writing related to the Consolidated Plan, amendments, revisions, Annual Action Plan, CAPER, and ~~Equity Plan~~. City staff will provide a written response to every resident complaint within fifteen (15) business days. If the response is unsatisfactory, the citizen should write directly to the Mayor. The Mayor will respond within fifteen (15) business days. If the citizen is still dissatisfied, they will be directed to contact the HUD Regional Office in Philadelphia to request an investigation.

AMENDMENTS TO THE CITIZEN PARTICIPATION PLAN

The City will periodically review and discuss the effectiveness of this Citizen Participation Plan to ensure the City is effectively facilitating opportunities for citizen engagement in the community development process and helping to meet the community development needs and goals identified by the citizens of the City. The City may modify the provisions of this Citizen Participation Plan through an amendment. All substantial amendments to this Citizen Participation Plan will be made available to the public for a comment period of 30 days before they are adopted by the City of Reading. All amendments will be approved by City Council and will be incorporated into this Plan.

CITIZEN PARTICIPATION CONTACT PERSON

The City of Reading community development staff serves as the contact person for all questions and concerns about citizen participation activities. They are responsible for implementing citizen participation throughout the community development process through activities such as:

1. ensuring citizen participation activities follow this plan;
2. informing the community about opportunities to participate in planning, implementation, and monitoring;
3. sharing information about proposed projects and the status of current project activities;
4. communicating with and engaging stakeholder groups;
5. receiving and documenting ideas, comments, and proposals from local residents and stakeholders; and
6. monitoring the citizen participation process and proposing amendments as needed.

All questions about citizen participation can be addressed to:

City of Reading PA
Community Development Department Director
City Hall
815 Washington Street
Reading, PA 19601