



**State of Wisconsin**  
Department of Administration

# **CITIZEN PARTICIPATION PLAN**

**produced in conjunction with the State of  
Wisconsin's Consolidated Plan for April  
1, 2015 through March 31, 2020**

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**State of Wisconsin ■ Tony Evers, Governor**  
**Department of Administration ■ Joel Brennan, Secretary**

## INTRODUCTION

This document outlines the Division of Energy, Housing and Community Resources' responsibilities for obtaining citizen participation in the process of preparing, amending, and updating its Consolidated Plan.

The Consolidated Plan details Wisconsin's housing and community development needs, the strategies the Division of Energy, Housing and Community Resources will undertake to address these needs, and the annual action plan for the first and subsequent years that the Plan is in effect.

The Consolidated Plan serves as the State of Wisconsin's application to the U.S. Department of Housing and Urban Development (HUD) for program funds of the Small Cities Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), Housing Trust Fund (HTF) and Housing Opportunities for Persons With AIDS (HOPWA). A number of cities and metropolitan counties<sup>1</sup> within Wisconsin prepare their own Consolidated Plans.

At the time of publication, HUD has not finalized its rules as to the applicability of the Assessment of Fair Housing (AFH) for States when conforming to the requirements of Affirmatively Furthering Fair Housing (AFFH). The Division supports the furtherance of AFFH. Once HUD has finalized rules regarding an AFH and has issued guidance to States, any requirements to perform an AFH will be done in accordance with this guidance and all requirements of the citizen participation plan will apply to the Division's development of the AFH.

The state agency responsible for preparing the Consolidated Plan is the Department of Administration's Division of Energy, Housing and Community Resources (DOA-DEHCR). It administers the CDBG, ESG, HOME, and HOPWA programs. The Wisconsin Housing and Economic Development Authority (WHEDA) administers the HTF.

The agency contact for the Consolidated Plan and this Citizen Participation Plan is:

**Susan Brown, Administrator, Division of Energy,  
Housing and Community Resources**  
Wisconsin Department of Administration  
101 E. Wilson St.  
P.O. Box 7970  
Madison, WI 53707-7970  
(608) 266-7531/(608) 266-5381 (FAX)

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<sup>1</sup> Appleton, Beloit, Eau Claire, Fond du Lac, Green Bay, Janesville, Kenosha, La Crosse, Madison, Milwaukee, Milwaukee County, Neenah, Oshkosh, Racine, Sheboygan, Superior, Waukesha County, Wausau, Wauwatosa, and West Allis.



## **PARTICIPATION IN DEVELOPMENT OF CONSOLIDATED PLAN**

The Division of Energy, Housing and Community Resources shall provide for and encourage local government, agency, and citizen participation in the development of its Consolidated Plan. The Division of Energy, Housing and Community Resources shall undertake the following actions in these areas.

### **Encouragement of Participation—General**

The Division shall encourage participation in the development of its Consolidated Plan through the following means as appropriate:

- 1) Mass mailing paper copies or emailing electronic copies of notices to the assembled distribution lists of the Division of Energy, Housing and Community Resources and local unit of government clerks.;
- 2) Notices to the various media outlets;
- 3) Listening sessions and information dissemination at statewide affordable housing and homeless conferences and other relevant events.
- 4) Posting of public notices concerning the Consolidated Plan on the Internet at the Wisconsin DOA-DEHCR website.
- 5) Online Consolidated Plan survey and comment opportunity on the State of Wisconsin DOA-DEHCR website.

### **Participation of Nonentitlement Municipalities and Other Units of Government**

The Division of Energy, Housing and Community Resources shall notify non-entitlement municipalities and other units of government directly by email of the Consolidated Plan's development process.

The Division of Energy, Housing and Community Resources shall solicit ideas regarding the distribution method and priorities for housing and community development funds annually at related conferences and events. The target audiences are non-entitlement units of government, housing agencies, economic development associations, consultants, homeless and special needs service providers. The Division of Energy, Housing and Community Resources may engage the committee process when soliciting comments and input regarding program design.

### **Participation of Public and Private Agencies**

Public and private sector agencies that provide assisted housing, health services, social services, and economic development shall receive notification by mail or email of the Consolidated Plan's development process. The Division shall encourage written and electronic comments and attendance at listening sessions, public hearings and use of the Wisconsin DOA-DEHCR website. In addition, the Division shall work with representatives from public and private agencies to help with data analysis and to provide

feedback on Wisconsin's housing and community development needs and potential solutions.

Public and quasi-public agencies include: the Wisconsin Economic Development Corporation (WEDC), WHEDA; the Departments of Health Family Services, Children and Families, Administration, Veterans Affairs, and Corrections, the University of Wisconsin, USDA Rural Development, and local county or nonprofit economic development associations.

Private agencies include grantee and applicant organizations of the Division of Energy, Housing and Community Resources which are located throughout the state, and statewide agencies such as: Foundation for Rural Housing; Wisconsin Community Action Program Association; and the Wisconsin Association of Housing Authorities.

### **Participation of Citizens**

The Division of Energy, Housing and Community Resources shall encourage the participation by Wisconsin's citizens in the Consolidated Plan's development process. In order to maximize the participation of citizens of low income, with mobility or other impairments, or with a language barrier, the Division shall, in addition to the steps outlined above:

- 1) Provide an online Consolidated Plan survey on the Wisconsin DOA-DEHCR website to capture comments and recommendations for Consolidated Plan programs and priorities in multiple languages including: English, Spanish and Hmong.
- 2) Notify through mail or email the availability of the online survey for the Consolidated Plan development.
- 3) Schedule hearings and forums at times and locations that are convenient to potential and actual beneficiaries.
- 4) Ensure that hearing and forum sites can accommodate persons with mobility impairments (the advertisement mentioned above will include this information).
- 5) Arrange for special communication accommodations in multiple languages, if notified by potential participants at least one week prior to the public hearing.
- 6) Accept comments via email and TTY in multiple languages.

### **Access to Information**

The Division of Energy, Housing and Community Resources shall make available to units of local government, citizens, agencies, and other interested parties information on the amount of anticipated revenue for housing and community development activities for the following year. Furthermore, the Division of Energy, Housing and Community Resources

shall make available information on its proposed range of activities, including the estimated amounts of funds that are proposed to benefit persons or low and moderate income. The Division of Energy, Housing and Community Resources shall address and minimize any displacement that its activities would create. The Division will provide assistance to any persons displaced, will specify the types and levels of assistance the Division will make available (or require others to make available) to persons displaced, even if the Division expects no displacement to occur. This information will be available upon request.

### **Publication of Proposed Consolidated Plan**

The Division of Energy, Housing and Community Resources shall have the proposed Consolidated Plan available in print and by electronic means on the Internet.

The public comment period for the proposed Consolidated Plan will be at least thirty days. The Division of Energy, Housing and Community Resources shall publish a notice of the availability for comment in the Wisconsin State Journal on or before the first day of the comment period.

The Division of Energy, Housing and Community Resources shall publish a summary in the Wisconsin State Journal. This summary will include how the public can obtain copies or examine the proposed Consolidated Plan.

The Division of Energy, Housing and Community Resources shall mail printed copies of the proposed Consolidated Plan to the main branches of the public libraries in the following communities: Appleton, Eau Claire, Green Bay, La Crosse, Madison, Marinette, Milwaukee, Platteville, Racine, Rhineland, Rice Lake, Richland Center, River Falls, Superior, and Wausau.

The Division of Energy, Housing and Community Resources shall also make copies available free of charge to the public, both in printed form and by electronic means. A reasonable number of copies will be printed; if that supply is exhausted, the Division of Energy, Housing and Community Resources shall provide additional copies in electronic form only.

Comments on Consolidated Plan programs should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall consider the comments it receives during the comment period as it prepares the final Consolidated Plan. The Division of Energy, Housing and Community Resources shall append a summary of these comments, both those accepted and those rejected, to the final Consolidated Plan.

### **AMENDMENTS TO THE CONSOLIDATED PLAN**

#### **Criteria for Substantial Amendments**

The Division of Energy, Housing and Community Resources considers a substantial change in the method used to distribute CDBG, HOME, ESG, HTF and HOPWA funding as described in the annual action plan to constitute a substantial amendment. If enough applications meeting the criteria described in a Division of Energy, Housing and Community Resources program are not received in a given action plan year, the Division of Energy, Housing and Community Resources reserves the right to redirect the program's unused funds to other programs described in the method of distribution to ensure maximum utilization of funds without a substantial amendment.

Prior to the submission of a substantial amendment to HUD, the Division of Energy, Housing and Community Resources shall publish notice of its intention to make the substantial amendment in the Wisconsin State Journal. The text of the proposed substantial amendment will be available from the Division of Energy, Housing and Community Resources.

The comment period will be not less than 30 days in length unless the Department of Housing and Urban Development waives the 30-day comment period. The Division of Energy, Housing and Community Resources shall consider any comments or views received when preparing the final version of the substantial amendment.

Comments should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall append a summary of these comments, both those accepted and those rejected, to the final version of the substantial amendment.

## **PERFORMANCE REPORTS**

Prior to the submission of its annual performance report to HUD, the Division of Energy, Housing and Community Resources shall publish notice of its availability for comment in the Wisconsin State Journal. The draft annual performance report will be available from the Division of Energy, Housing and Community Resources. The comment period will be not less than fifteen days in length. The Division of Energy, Housing and Community Resources shall consider any comments or views received when preparing the final version of the report. The Division of Energy, Housing and Community Resources shall append a summary of these comments to the final version of the report.

Comments should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970

## **ACCESSIBILITY OF CONSOLIDATED PLAN, AMENDMENTS, AND PERFORMANCE REPORT TO PUBLIC**

### **Availability of Documents**

The Division of Energy, Housing and Community Resources shall make available to the public the final Consolidated Plan, any substantial amendments, and annual performance

reports. Copies will be available in printed form or electronic means.

Interested parties should request printed or electronic copies from the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall make these materials also available in a format for persons with disabilities and in multiple languages upon request.

### **Access To Records**

The Division of Energy, Housing and Community Resources shall make available to citizens, public agencies, and other interested parties its records relating to the Consolidated Plan, and the use of assistance under this Plan. The Division of Energy, Housing and Community Resources may provide certain data, if voluminous, only in summary format. Any information released will protect the confidentiality of program beneficiaries.

The Division of Energy, Housing and Community Resources shall make an effort to respond to requests for records within fifteen working days.

The Division of Energy, Housing and Community Resources shall maintain such records for a period of five years.

Interested parties should request records on the CDBG, HOME, ESG and HOPWA programs from the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

Interested parties should request records on the HTF program from the Wisconsin Housing and Economic Development Authority, P.O. Box 1728, Madison, WI 53701-1728.

### **CITIZEN PARTICIPATION REQUIREMENTS FOR LOCAL GOVERNMENTS (CDBG PROGRAM)**

Units of general local government applying for CDBG funding must adhere to the citizen participation requirements promulgated in the Code of Federal Regulations, Part 24, Section 570.486 (24 CFR §570.486). Specifically, the Division of Energy, Housing and Community Resources shall require that local governments:

- 1) adopt a resolution in support of a citizen participation plan that is in conformance with 24 CFR §570.486;
- 2) include the citizen participation plan in its CDBG application materials;
- 3) provide evidence (e.g., sign-in lists for public hearings) that elements of the citizen participation plan were followed in the preparation of its CDBG application.



## **COMPLAINTS**

The Division of Energy, Housing and Community Resources shall accept any complaint concerning the Consolidated Plan, substantial amendments, and annual performance reports. Complaints should be in written form and should be mailed to:

Division of Energy, Housing and Community Resources, Department of Administration,  
P.O. Box 7970, Madison, WI 53707-7970

The Division of Energy, Housing and Community Resources shall respond to complaints in writing within fifteen working days. Complaints should be addressed to the Division of Energy, Housing and Community Resources, Department of Administration no later than one year after their comment period expires.<sup>2</sup>

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<sup>2</sup> Editing note: The Final Rule is silent on the length of time within which complaints should be accepted. Given that amendments are generally issued annually and the action plan is updated annually, a one-year limit on complaints is a reasonable time standard.

## **ABBREVIATED PUBLIC PARTICIPATION PROCEDURES**

Under limited circumstances, the U.S. Department of Housing and Urban Development (HUD) provides authorizations to grantees in order to expedite the implementation of special allocations of funding. In the instance that the U.S. Department of Housing and Urban Development (HUD) provides the Division with an additional allotment of funding AND authorizes the Division to utilize an abbreviated public participation period, defined as any period less than 30 days in length, the following processes and procedures will be implemented.

### **Encouragement of Participation—Abbreviated**

The Division shall encourage participation in the development of authorized uses of all HUD funding through the following means as appropriate:

- 1) Notices to the various media outlets;
- 2) Posting of public notices concerning the available funding on the Internet at the Wisconsin DOA-DEHCR website and the State of Wisconsin's Public Notice Website.
- 3) The public hearing will be held either in-person or telephonically as allowed by HUD.

### **Participation of Non-entitlement Municipalities and Other Units of Government**

The Division of Energy, Housing and Community Resources shall notify non-entitlement municipalities and other units of government directly by email of the availability of additional funding, the applicable public input period and how to provide input on the uses of the funding.

### **Participation of Public and Private Agencies**

Public and private sector agencies that provide assisted housing, health services, social services, and economic development shall receive notification by email of the availability of additional funding, the applicable public input period and how to provide input on the uses of the funding.

### **Access to Information**

The Division of Energy, Housing and Community Resources shall make available to units of local government, citizens, agencies, and other interested parties information on the amount of anticipated revenue for housing and community development activities for the following year. Furthermore, the Division of Energy, Housing and Community Resources shall make available information on its proposed range of activities, including the estimated amounts of funds that are proposed to benefit persons or low and moderate income. The Division of Energy, Housing and Community Resources shall address and minimize any displacement that its activities would create. The Division will provide

assistance to any persons displaced, will specify the types and levels of assistance the Division will make available (or require others to make available) to persons displaced, even if the Division expects no displacement to occur. This information will be available upon request.

### **Publication of Proposed Uses for Funding**

The Division of Energy, Housing and Community Resources shall have the proposed uses of funding available by electronic means on the Internet.

The public comment period for the proposed uses of funding will follow the guidelines issued by HUD. The Division of Energy, Housing and Community Resources shall publish a notice of the availability for comment in the Wisconsin State Journal on or before the first day of the comment period.

Comments on the proposed uses of funding for the applicable programs should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall consider the comments it receives during the comment period as it determines the eligible uses for the funding received. The Division of Energy, Housing and Community Resources shall keep a record of these comments, both those accepted and those rejected, in its files.

### **AMENDMENTS**

#### **Criteria for Substantial Amendments**

The Division of Energy, Housing and Community Resources considers a substantial change in the method used to distribute CDBG, HOME, ESG, HTF and HOPWA funding as described on the DEHCR internet site to constitute a substantial amendment. If enough applications meeting the criteria described in a Division of Energy, Housing and Community Resources program are not received during the authorized period of funding, the Division of Energy, Housing and Community Resources reserves the right to redirect the program's unused funds to other programs to ensure maximum utilization of funds without a substantial amendment.

Prior to the submission of a substantial amendment to HUD, the Division of Energy, Housing and Community Resources shall publish notice of its intention to make the substantial amendment in the Wisconsin State Journal. The text of the proposed substantial amendment will be available from the Division of Energy, Housing and Community Resources.

The comment period will be not less than 30 days in length unless the Department of Housing and Urban Development waives the 30-day comment period. The Division of Energy, Housing and Community Resources shall consider any comments or views received when preparing the final version of the substantial amendment.

Comments should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall append a summary of these comments, both those accepted and those rejected, to the final version of the substantial amendment.

## **PERFORMANCE REPORTS**

Any performance reporting required subsequent to an allocation for funding under these procedures will follow guidance issued by HUD. Prior to the submission of any required reporting to HUD, the Division of Energy, Housing and Community Resources shall publish notice of its availability for comment in the Wisconsin State Journal. The draft performance report will be available from the Division of Energy, Housing and Community Resources. The comment period will be not less than fifteen days in length unless waived by HUD. The Division of Energy, Housing and Community Resources shall consider any comments or views received when preparing the final version of the report. The Division of Energy, Housing and Community Resources shall append a summary of these comments to the final version of the report.

Comments should be sent to the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970

## **ACCESSIBILITY OF CONSOLIDATED PLAN, AMENDMENTS, AND PERFORMANCE REPORT TO PUBLIC**

### **Availability of Documents**

The Division of Energy, Housing and Community Resources shall make available to the public planned uses for funding, any substantial amendments, and any performance reports. Copies will be available in printed form or electronic means.

Interested parties should request printed or electronic copies from the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

The Division of Energy, Housing and Community Resources shall make these materials also available in a format for persons with disabilities and in multiple languages upon request.

### **Access To Records**

The Division of Energy, Housing and Community Resources shall make available to citizens, public agencies, and other interested parties its records relating to the funds received pursuant to this authority. The Division of Energy, Housing and Community Resources may provide certain data, if voluminous, only in summary format. Any information released will protect the confidentiality of program beneficiaries.

The Division of Energy, Housing and Community Resources shall make an effort

to respond to requests for records within fifteen working days.

The Division of Energy, Housing and Community Resources shall maintain such records for a period of five years.

Interested parties should request records on the applicable programs from the Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970.

Interested parties should request records on the HTF program from the Wisconsin Housing and Economic Development Authority, P.O. Box 1728, Madison, WI 53701-1728.

### **CITIZEN PARTICIPATION REQUIREMENTS FOR LOCAL GOVERNMENTS (CDBG PROGRAM)**

Units of general local government applying for CDBG funding under this authority must adhere to the citizen participation requirements promulgated in the Code of Federal Regulations, Part 24, Section 570.486 (24 CFR §570.486). Specifically, the Division of Energy, Housing and Community Resources shall require that local governments:

- 1) adopt a resolution in support of a citizen participation plan that is in conformance with 24 CFR §570.486;
- 2) include the citizen participation plan in its CDBG application materials;
- 3) provide evidence (e.g., sign-in lists for public hearings) that elements of the citizen participation plan were followed in the preparation of its CDBG application.

### **COMPLAINTS**

The Division of Energy, Housing and Community Resources shall accept any complaint concerning the uses of funding authorized under this section. Complaints should be in written form and should be mailed to:

Division of Energy, Housing and Community Resources, Department of Administration, P.O. Box 7970, Madison, WI 53707-7970

The Division of Energy, Housing and Community Resources shall respond to complaints in writing within fifteen working days. Complaints should be addressed to the Division of Energy, Housing and Community Resources, Department of Administration no later than one year after their comment period expires.<sup>3</sup>

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<sup>3</sup> Editing note: The Final Rule is silent on the length of time within which complaints should be accepted. Given that amendments are generally issued annually, and the action plan is updated annually, a one-year limit on complaints is a reasonable time standard.