City of Evanston
COVID-19 Citizen Participation Plan Amendment

Introduction and Purpose
The City of Evanston is amending its Citizen Participation Plan as allowed under the CARES Act and based on HUD’s recognition that the efforts to contain COVID-19 require limiting public gatherings used to obtain citizen participation, and the need to respond quickly to the growing spread and effects of COVID-19. The City will follow the amended Citizen Participation described below as allowed by the HUD waiver of 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 to provide residents and stakeholders reasonable notice and opportunity to comment on the City’s substantial amendment to its 2019 Action Plan for CDBG-CV and ESG-CV funding from the CARES Act.

The City’s Housing and Grants Division, Community Development Department is the lead agency with responsibility for implementing the amended Citizen Participation Plan for the CARES Act substantial amendment, and any subsequent amendments for funding from that Act.

Needs Assessment - CARES Act Substantial Amendment to the 2019 Action Plan
Housing and Grants staff received input on the needs resulting from the COVID-19 pandemic from Evanston stakeholders and residents during the development of the CARES Act substantial amendment. Sources include:

- Mayor Hagerty’s COVID-19 Task Force comprising key members of the education, government, business, faith, nonprofit, health, and senior communities. Organizations include AMITA Health Saint Francis Hospital, NorthShore University HealthSystem, Representative Jan Schakowsky, State Senator Laura Fine, State Representatives Robyn Gabel and Jennifer Gong-Gershowitz, Cook County Commissioner Larry Suffredin, Evanston senior living communities, Evanston Chamber of Commerce, Evanston Community Foundation, Interfaith clergy and leaders, Evanston Own It, Northwestern University, Evanston/Skokie School District 65, and Evanston Township High School District 202. The task force has been met at least weekly since 3/17/2020.

- City of Evanston Emergency Operations Center, a cross-departmental team formed to address the immediate needs of the COVID-19 emergency, secure resources to address those needs, and develop a multi-phase “re-opening” plan for the City, coordinated with the State of Illinois and federal plans.

- Non-profit agencies that are addressing the needs for housing, shelter, food, and other necessities, including Connections for the Homeless, Meals On Wheels Northeast Illinois, Interfaith Action, YWCA Evanston North Shore, Family Promise, and the McGaw YMCA Men’s Residence Program.

- Surveys of local businesses and landlords/property managers to determine needs and their ability to access assistance through programs such as the Small Business Administration’s Payroll Protection Plan.
**Allocation Process**

To expedite access to funding and provide relief to residents, City staff developed the substantial amendment for CARES Act funding based on the needs identified through the assessment process described above. This enables the City to submit its substantial amendment before the detailed regulations for CDBG-CV and ESG-CV are released. It also allows greater flexibility to prevent, prepare for, and respond to the coronavirus by addressing needs that will likely arise in the months ahead. Funding allocations to specific activities will be made on a rolling basis to target needs that are not being addressed through other CARES Act funding and potential duplication of benefits. This process is similar to how HOME and ESG funds are allocated to one or more goals in the annual Action Plan rather than the annual application process used for CDBG entitlement which uses an open application process and allocations are made to specific activities to develop the Action Plan. Funding allocations for specific activities will be reviewed and approved by City Council prior to implementation. City Council may delegate authority to approve funding allocations for specific activities to the Housing and Community Development Act Committee, Housing and Homelessness Committee, Economic Development Committee, Mayor’s COVID-19 Task Force, or other board, committee or commission that has been formed by the City to oversee the type of activities being funded on behalf of City Council. Any such action will be approved by City Council at a public meeting that provides members of the public the opportunity to provide input on the action. Information on the proposed action will be included in the agenda and packet for the meeting that is posted at least 48 hours in advance, in compliance with the Open Meetings Act.

**Substantial Amendments to the Consolidated Plan or Action Plans**

HUD requires entitlement communities to specify the criteria that trigger an amendment to the Consolidated Plan or Action Plan and describe the public process for amending those plans. The City of Evanston defines a substantial amendment to its Consolidated Plan or Action Plan as:

- A change in funding among the Goals used in the development of the plan (SP-45 for Consolidated Plan, AP-20 for Annual Action Plans), that is greater than 20% of the total allocated towards the Goal
- The deletion of a Goal included in a plan
- The addition of a Goal not currently included in a plan

The CARES Act substantial amendment requires amendments to both the 2019 Action Plan and 2015-2019 Consolidated Plan. These amendments, and this amendment to the Citizen Participation Process, will be posted on the City of Evanston’s HUD Consolidated Plan webpage at https://www.cityofevanston.org/government/departments/community-development/hud-consolidated-plan for a minimum of five (5) days, as required. Comments on the substantial amendments may be submitted via email to cdbg@cityofevanston.org during the five-day public comment period. In addition, the CARES Act substantial amendment must be approved by City Council before its submission to HUD. The substantial amendment will be included in the packet for the City Council “virtual” meeting that will be posted at least 48 hours prior to the start of that meeting. Input may be provided in writing via email or verbally by telephone or online during public comment. Any public comment received during the comment period,
including at public comment at the City Council meeting, will be considered, summarized and attached to the substantial amendment when submitted to HUD, including any comments or views that are not accepted and the reasons for which they are not accepted.

The allocation of funding to specific activities, changes in the amount of funding for projects, and the addition or deletion of projects will not constitute a substantial amendment.

This amended Citizen Participation Process will be used for any additional substantial amendments required by additional CARES Act funding as they occur.

**Process for Citizen Participation**
The City of Evanston invites public participation in the CARES Act substantial amendment process. The City is committed to providing reasonable notice and opportunity to comment to all members of the community, as described above.

**Public Outreach**
The City will use multiple communications channels to inform residents about the CARES Act substantial amendment. The following outreach efforts may be taken as appropriate to provide citizen access to the Consolidated Planning process. Failure to use any one of these shall not be considered a violation of this Plan.

- Notice of all public comment periods and public hearings will be included in the News section of the City website, on the City’s social media accounts (Facebook, Twitter, etc.), and in the City’s e-newsletter sent to over 50,000 emails at the opening of the five-day public comment period. The notice will include the dates of the comment period, as well as the date and time and location of the City Council meeting at which public comment may be made.
- Notice of the public meeting will be sent to the media in accordance with the Illinois Open Meetings Act. The meeting agenda and packet will be posted on the City website for public review at least 48 hours in advance of the meeting.
- Email notification will be sent to community organizations and individuals who request to receive information about the City’s Consolidated Planning process.

**Public Meetings**
During the COVID-19 pandemic, Evanston City Council meetings have been modified based on Governor Pritzker’s order that waives some requirements of the Illinois Open Meetings Act to allow local governments and other public bodies to hold “remote” meetings to help control the spread of COVID-19. That order waives the requirement that a quorum of members of a public body be “physically present” at the meeting location, and limits the circumstances under which an individual member may take part by video or audio conference. It applies to City Council meetings, as well as Evanston board, committee and commission meetings. The order did not suspend other provisions of the Open Meetings Act pertaining to public notice of all meetings or that meetings be open and accessible to the public and press, and includes that there must be a way for the public to address the Council, board, committee or commission.
Access to Information
The City of Evanston’s CARES Act substantial amendment, amended Citizen Participation Plan, Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports are available online at www.cityofevanston.org. The City website may be translated into 150 different languages using Google Translate. Information will be provided in a format accessible to persons with disabilities upon adequate notice. Requests for additional information may be made to the Housing and Grants Division of the Community Development Department via the City’s 311 system. A response will be provided within 15 working days of receipt of the request, where practicable. If printed copies are requested, photocopier charges and miscellaneous charges for other related services and materials will be assessed in accordance with the City's Freedom Of Information Act policy.

Comments/Complaints
Any complaints relating to the CARES Act substantial amendment received in writing will receive a written response within 15 working days. The following points are used as guidance in responding to complaints:

- Stated needs and objectives are inconsistent with available and reliable data
- Stated projects are inappropriate for meeting needs and approved objectives
- The substantial amendment does not comply with CARES Act regulations for the CDBG-CV or ESG-CV programs.