

CHAPTER 11 -- INVOLVING THE PUBLIC

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CHAPTER 11

INVOLVING THE PUBLIC

I. OVERVIEW

Congress and HUD have always placed strong emphasis on citizen participation in the CDBG program. Montana's CDBG Program places strong emphasis on involving the public during the development of an application for CDBG funding. As an applicant for CDBG funds, your community held a minimum of two public hearings to encourage meaningful public involvement in the planning for your project. Many communities went beyond this minimum requirement and conducted community attitude surveys as part of their needs assessment process or held town meetings to solicit citizen comments on community needs.

The need to keep the public informed and involved does not stop after you receive notice that your grant application was selected for funding. An effective program for involving and informing local citizens can also be vital to the success of a CDBG project. As the community develops an awareness of the project, the issues involved, and the potential benefits, citizens will develop a sense of ownership and participation in the project and a better understanding of how their local officials and staff are working on their behalf.

Another issue that sometimes comes up in managing a local CDBG project is dealing with complaints. No matter how hard local officials, staff, or consultants work to implement a project as smoothly as possible, someone will usually be dissatisfied with some aspect of the project. Complaints "come with the territory" and may be expressing very legitimate concerns. On the positive side, taking steps to resolve a complaint can provide an opportunity to solve a problem or a concern for a citizen. The citizen who receives prompt, fair, and courteous treatment in response to a complaint will usually respond favorably, regardless of the final outcome.

This chapter describes the requirements and obligations a CDBG recipient has for involving the public during implementation of a CDBG project and some techniques to help accomplish this.

II. APPLICABLE REQUIREMENTS

Section 104 (a)(2) of the Federal Housing and Community Development Act provides that to enhance public accountability, the grantee must in a timely manner furnish citizens information about the amount of funds available for proposed community development and housing activities, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income. The Act also requires CDBG recipients to provide citizens with reasonable access to records regarding the past use of CDBG funds and reasonable notice of, and an opportunity to comment on, any substantial change proposed to be made in the use of CDBG funds from one eligible activity to another or in the method of distribution of CDBG funds.

The Housing and Community Development Act requires that CDBG recipients:

- ☐ Provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which [CDBG] funds are proposed to be used, and provide for participation of residents in low and moderate income neighborhoods as defined by the local jurisdiction;

- ☐ Provide citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, and relating to the actual use of funds;
- ☐ Provide for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- ☐ Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance. Hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- ☐ Provide for timely written answers to written complaints and grievances, within 14 working days where practicable; and
- ☐ Provide for the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

III. GRANTEE RESPONSIBILITIES

A. KEEPING THE PUBLIC INFORMED

There is an understandable tendency for the local officials and staff of any community to get absorbed in the day-to-day details of administering their CDBG project. It is easy to forget that it is also important to keep local citizens up to date on what is going on, too. Your goal should be to keep the public fully informed about the CDBG project as it proceeds. For example, on many local public facility projects, there are often plenty of "sidewalk superintendents" who are always eager to convey their opinions about the project to friends and neighbors. The best way for local officials and staff to stay ahead of the "rumor mill" is to continually make efforts to keep the public informed about what is really going on and why.

Public facility projects are especially visible to and can impact many local citizens. Utility installation and replacement projects can also cause hardships on local residents. Because of this, it is important to inform the public well in advance regarding street closures, water shut offs, any delays that can be expected, and the general status of the project. Procedures to keep the public informed need to be planned and initiated before construction begins and need to be continued throughout the project.

Keeping people informed can help accomplish other goals related to your project, too. For example, with a housing and neighborhood revitalization project, continued publicity helps to market your housing program and lets people know that help is available to improve their homes or to purchase a home. In most public facility projects involving water or sewer improvements, even with CDBG participation, there will be an increase in local rates or user charges. Continued publicity regarding the project helps local citizens understand why these costs must go up and makes them feel like part of the process, rather than just being on the receiving end of a higher water or sewer bill. Publicity also helps inform people regarding the complex issues their local governments are facing in trying to provide adequate public facilities, such as the need to install water meters or to annex areas into the city.

Publicity about your CDBG project can also be used to generate enthusiasm about your community and your long-term goals to revitalize your town or a neighborhood.

Publicity efforts do not have to be sophisticated to be effective. Past recipients under Montana's CDBG Program have varied in population from Butte-Silver Bow at 34,000 to the Town of Bearcreek at 83. Publicity and citizen participation efforts need to be tailored to the situation in each community.

One approach followed in many communities is to have the project engineer or manager provide monthly progress reports to the City or Town Council. Copies of the progress report can then be provided to the local newspaper or radio station. Updates on the progress of the project can be sent out with the monthly water or sewer bills.

Another option would be to have the project manager or members of the city council make brief presentations to local civic groups or service organizations to bring them up to date. A Power Point presentation can be a very effective way to show the impact of a local CDBG project for those involving housing rehabilitation, where the change in the physical appearance of a home, inside and outside, before and after rehabilitation, can be very dramatic.

B. WORKING WITH THE MEDIA

Many communities with excellent CDBG projects have never really received the credit they should because local officials or staff expected that the media would hear about their efforts and publicize CDBG project activities. Recognition seldom happens without people taking active steps to inform other people about what is going on. If you can interest the media in your CDBG project, you will reach a much larger audience than you can any other way. Radio, television, and newspaper reporters and editors are always looking for a good feature idea, especially if you will work with them and it can be developed by them as their own story, rather than just a press release.

It is always desirable if the local newspaper can provide coverage of any major meeting or event regarding the CDBG project to help keep citizens up to date on new developments. The project manager or the Mayor can also contact the local newspaper to periodically brief the editor or reporters on the status of the community's CDBG project.

If you do a press release or are interviewed about your project, it is very helpful if you mention that CDBG funds have helped to finance the project. This makes other communities aware that the CDBG program may be an option to help them deal with their problems and also lets people know where their federal tax dollars are going. It also lets our U.S. Senators and Congressman know that the program is accomplishing good things for their constituents.

A local radio talk show or call-in program can be an effective way for a project manager or local officials to spread the word about the current progress of the CDBG project. These types of programs are always looking for new material, particularly if it will be of general interest to the public or of a "public service" nature. You can help the interviewer by making up a list of possible questions or key issues beforehand.

It's important to build a good working relationship with the media. You should make every reasonable effort to accommodate the media staff and their schedules. Find out what deadlines and schedules your local newspaper or radio or television stations follow and avoid asking them to give you coverage just before a deadline. For example, weekly newspapers typically have one especially hectic day each week when they prepare to go to press. You should find out what day it is and try to schedule any special events or meetings around it so you give the newspaper adequate time to incorporate news

about your activity in the latest edition. Otherwise your meeting or special event may be "old news" by the time it's publicized.

For any special event or meeting, prepare clear, concise background information for reporters. Reporters may be unfamiliar with the issues of concern to you and often will not have time to do background research before their deadline. You can refer to information from the MDOC CDBG website: <http://comdev.mt.gov/CDBG/default.mcpix>

You can also check with your local newspaper to see whether they will accept photographs or will want to take their own. If they will accept digital photos, find out what kind of photo format they prefer. Newspapers like to use shots including an activity or an object that helps to tell a story rather than just group pictures. Television news, in particular, like footage showing action; such as construction activity. where a group is photographed, try to limit the number of people photographed to no more than three or four. You should always accurately identify the names and titles of all the people included in the photograph.

Try to have a story focus on the people that will benefit from the project. A press release about your housing rehabilitation project is not nearly as interesting as a "human interest" story about an elderly, low-income widow who has had her life changed by a CDBG loan to improve her home. See **Exhibit 11-B** for an example of newspaper coverage of a CDBG project.

Although local officials involved in administering a CDBG project are understandably immersed in an alphabet soup of acronyms, try to avoid using jargon or technical terms that will not be familiar to the general public. Use straightforward, simple language whenever possible.

► Remember, working with the media is about building relationships. Always ask these questions: What do you need from me? What can I do to help you? Stories get printed or broadcast more often when you help them to do a better job and to meet their tight deadlines.

C. PRESS RELEASES

Press releases should be used primarily for special events or major new developments, rather than routine events. If they are used continually, they tend to be ignored. Also, in most Montana communities the local media do not need a format as formal as a press release. However, by reviewing these suggestions you can help make sure that the materials you put together for local media cover the key issues.

The lead (first) paragraph should single out the answer to at least two of journalism's five "W's": who, what, when, where, and why. The remainder of the "W's" should be answered in the second paragraph. The lead paragraph should not be over four lines.

Try to begin the release with an eye-catching quote or key statement about the event you are trying to publicize. Use present tense and avoid terms such as "today" since you do not know when the article will be released. Write your release with the most important information in the beginning, in the order of priority, so the story can be cut from the end. Give a little background on the issue, if necessary.

Releases should be kept to one page in length, whenever possible. Keep it short and simple. They should be typed, double-space, on one side only.

If you do a press release for the radio or TV station or the newspaper, make sure that it includes the name and telephone number of a person who can be contacted for further information. Newspapers

or radio stations rarely use a press release just as it is written. More often, the press release is just the starting point for them to write their own story. It is a real help to them if they can call someone to ask additional questions to flesh out the story or to clarify key points. This will also give local officials or a project manager an opportunity to elaborate on the release or emphasize important aspects of the story.

The release should always be distributed sufficiently in advance for news people to do follow up to fit the story into their schedules for programs or printing. Do not send it at the last minute and expect good coverage.

The information you provide does not have to be as formal as a press release but including the key points covered here, in writing, via an e-mail, gives them a starting point for an article that they won't have to write from scratch. Find out what the reporter or editor needs and provide it for them to make their job easier.

Exhibit 11-C is a sample format for preparing a press release.

D. PROJECT SIGNS

A long-standing requirement for many federal funding programs, particularly those involving economic development and public facilities, is that the community erect a sign on or near the project site which describes the purpose of the project and the various funding sources. Some federal agencies, even require that bid specifications contain construction details for project signs including dimensions, size and type of lettering, and specific colors of paint.

MDOC has always strongly encouraged grant recipients to erect project signs to publicize the project and the sources of funding. Since 2000, CDBG recipients have been required to put up an appropriate sign or signs for their project.

More publicity regarding the project helps local citizens feel involved in the project. A well-done project sign can help generate enthusiasm about your project and give people the feeling that things are happening in the community or neighborhood. It also lets the public know that something worthwhile is being accomplished with their federal or state tax dollars.

Reasonable costs for preparing project signs is an eligible use of grant funds. Like the other aspects of publicity for a local CDBG project, a project sign does not have to be professionally done to be effective. The Town of Chester, for example, had a high school shop class paint their sign on a 4 X 8 foot sheet of plywood for the "Chester Northside Water System Improvements" CDBG project. The standard elements included in project signs for public facilities or economic development projects are shown in the examples in **Exhibits 11-D** and **11-E**. If another funding program requires a project sign and has specifications for size or color, that will suffice, as long as the Montana CDBG Program is credited and its financial participation listed along with the other funding agency or programs. A single sign may be located at a major construction site or signs may be located at multiple sites, depending up the nature of the project. For a community-wide project, local officials may choose to erect signs at the principal town entrances.

In a housing and neighborhood revitalization project, the project area will usually cover an entire neighborhood or even the entire community. In these cases, a single project sign may not be appropriate. The City of Havre's East End housing rehabilitation project placed signs on the lawns of homes being rehabilitated through the CDBG project. An example of the signs is shown in **Exhibit 11-E**. Included at the bottom of the sign is the HUD fair housing logo and the telephone

number for the rehabilitation program office. Some people may not want a sign in front of their home. Alternate locations may be suitable such as city property or a public park where improvements are being made with CDBG funds. A sign helps to market the program and create a sense that things are changing for the better in the neighborhood.

E. SPECIAL EVENTS

Special events, such as a ground breaking ceremony for a new water project, a ribbon cutting for a new factory, or special recognition for the first home rehabilitated through your housing rehabilitation project, can be used to let people know what is happening and to generate enthusiasm. Special events, such as a ground breaking ceremony for a new water treatment plant can be used to let people know what is happening and to generate enthusiasm for a community development project.

For example, one community held an open house, complete with hot dogs and soft drinks, to show off the town's new water treatment plan. Local public works staff also conducted guided tours for science classes from local schools to describe how the new plant operated to provide safe drinking water for the community. The students told their families what they had seen and increased community awareness of the project. Another community invited the Governor and members of the Montana Congressional delegation to cut the ribbon for a new manufacturing plant financed with CDBG assistance. The dignitaries were welcomed with a parade down Main Street, complete with the high school marching band. A special event can be a fun way for the whole town to give itself a pat on the back for a major accomplishment. However, they require careful pre-planning beforehand and adequate lead time to make all the necessary arrangements.

The U.S. Conference of Mayors promotes a "National Community Development Week" each April to highlight the CDBG program's contribution to community betterment. Included as sponsors of this annual effort to promote the CDBG program are the National Association of Counties, the National League of Cities, the National Association of Housing and Rehabilitation Officials, the National Community Development Association, and the National Council of State Community Development Agencies. The "Community Development Week" theme can be tied in with a local spring "clean up" or beautification campaign, an effort many communities already schedule each year.

During any special event, local officials can invite the Governor, State legislators, and/or members of Montana's Congressional delegation to cut a ribbon or tour the project. In particular, letting our U.S. Senators and Representative know what Montana communities are accomplishing with CDBG funds is important to them. One of Montana's senators complained that he rarely ever heard about the good achieved with CDBG funds; instead he only got complaints when a citizen was dissatisfied with some aspect of a local CDBG project. In making the tough decisions they face regarding competing needs in the federal budget, our Congressional delegation needs to know which programs are providing real benefits for their constituents. Letting them know that CDBG funds can make a positive difference is important to all of Montana's communities because of the intense competition for federal funds.

Likewise, for CDBG projects that are co-funded through the Treasure State Endowment Program (TSEP), the Governor and state legislators should also be invited to cut a ribbon or tour the project. Letting our state Senators and Representatives know what Montana communities are accomplishing with TSEP funds is also important because they want to know about State programs that are providing real benefits for their constituents.

See **Exhibit 11-F** for sample coverage of a CDBG special event.

F. OTHER PUBLIC INFORMATION TOOLS

1. BROCHURES AND FLYERS

Brochures or one-page fact sheets can be an excellent way to educate and inform people. Keep the material short and to the point. Housing rehabilitation projects frequently use brochures dropped off at homes to briefly describe the local program guidelines and give a contact for further information. One advantage of brochures is that they can be targeted to specific households or neighborhoods by door-to-door distribution or mail. In a public facility project, for example, a one-page notice could be mailed out with monthly water or sewer bills to let people know that the city will provide free water hook-ups or meters to low and moderate income households. Many computer software programs have "clip art" that can be used to cut and paste graphics or type headings for brochures, flyers, or notices for a local CDBG project.

2. NEWSLETTERS

In recent years, more CDBG applicants have been creating special newsletters to inform local residents about proposed projects before they apply for funding. This is a technique that can also be continued after the project is underway to keep citizens informed about the community's progress on the CDBG project. For example, updates on the project can be sent out with the monthly water or sewer bills to keep residents up to date on the project. Some public facility projects involve "targeting" of CDBG assistance to low and moderate families by paying for installation of water meters or hook up charges for a new utility or paying special assessments. A special newsletter or mailing can inform every family that this special assistance is available to them and give them a person or telephone number they can contact for more information.

It may also be possible to use other existing newsletters in your community, such as those published by local organizations, churches, schools or the county extension agent to get the word out on the local CDBG project. For example, with a housing and neighborhood revitalization project, continued publicity helps to market your housing program and lets people know that help is available to improve their homes or to purchase a home.

3. POSTERS

Posters have long been a common approach for publicizing local activities, special events, or public meetings. Posters should be neat, attractive, and not so large that they will take up too much space on a bulletin board or a storefront window. Posters should only be displayed for a week or two. If they are posted longer, they tend to be ignored. They are inexpensive and have many options for placement such as town halls, banks, grocery stores, welfare offices, churches, senior centers, libraries, laundromats - wherever the public might slow enough to read your message. Remember to ask permission before you put them up.

G. DEALING WITH COMPLAINTS

Unfortunately, no discussion of public relations for a CDBG project would be complete without mentioning the grant recipient's responsibility for dealing with complaints. Though local officials are doing their best to improve their community through their CDBG project, human nature seems to guarantee that some citizen, at some time, will probably be dissatisfied with some aspect of the project. In a housing rehabilitation project, a homeowner may have a legitimate dispute with a contractor over the quality of the work done on his or her home. In a public facility project, a taxpayer

may feel that the proposed project is poorly designed or too expensive that the new water or sewer rate is too high, or that construction activities have damaged their property.

The Federal Housing and Community Development Act makes it clear that local citizens have the right to offer their views at any point during the development and implementation of a CDBG project. **Any comment, suggestion, criticism, or complaint made by a citizen should be taken very seriously and deserves a prompt response.**

The federal statute that governs the CDBG program and all recipients of CDBG grant funds requires that “a timely written answer to written complaints and grievances” be provided by CDBG grantees “within 15 working days where practicable” (42 U.S.C. § 5304(a)(3)(E)). Telephoned or oral complaints also deserve a prompt response. The local government's response to any complaint must be documented.

As a rule of thumb, the more promptly local officials or the project manager can investigate the basis for a complaint and try to offer a reasonable solution, the better. It is human nature for the citizen lodging the complaint to feel that they are being ignored if the community does not respond with at least a telephone call immediately to investigate the situation. The longer the time before they are contacted, the greater the likelihood that their frustration or anger will increase. The fact that Congress took the unusual step of specifying the maximum time (15 working days) for a response suggests that it shares the frustration with communities that are slow to respond to citizen complaints. The usual pattern, if a citizen does not receive a quick and adequate response, is that the next complaint is lodged with MDOC, the Governor, the U.S. Department of Housing and Urban Development (HUD), a state legislator, or a member of Montana's congressional delegation. A complaint at this level can create a lasting negative impression regarding the worth or effectiveness of the CDBG program or the soundness of the State's or the local government's administration of the program.

The normal procedure if a complaint is filed with MDOC, the Governor, HUD, or a member of the congressional delegation, is to refer the complaint to local officials for response. MDOC will not dictate the form or manner of the response to local officials. The Department's staff are available to advise the community regarding any federal or State requirement that may be at question. **In most cases, the final resolution of the complaint is the authority and responsibility of the local grant recipient, unless the complaint deals with State or federal CDBG policies or requirements.** When the grant recipient has reached a decision as to whether or how the complaint is to be resolved, MDOC will communicate the local government's decision to the agency or office that originally referred it to MDOC for action.

Records of all citizen comments, whether in the form of letters or written notes summarizing telephoned or oral comments, should be placed in the citizen participation file for the project, along with the community's letter of reply or notes indicating how the grant recipient responded to the comment. Federal regulations require that the Project Completion Report prepared by the grantee for project closeout include a summary of each citizen comment regarding the project, along with an assessment of the comment and a description of any action taken in response to the comment. Hopefully, the citizen participation file will be filled with compliments, rather than complaints.

CHAPTER 11

EXHIBITS

- 11-A Montana CDBG Program Summary**
- 11-B Sample Newspaper Coverage of a Local CDBG Project**
- 11-C Sample Format for a News Release**
- 11-D Example of a Project Sign for a CDBG Public Facility Project**
- 11-E Sample Project Sign Formats**
- 11-F Example of Coverage of a CDBG Special Event**