

WORKABLE PROGRAM FOR COMMUNITY IMPROVEMENT

October 1968

A HUD HANDBOOK

U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT WASHINGTON, D. C. 20410

PREFACE FOR WORKABLE PROGRAM HANDBOOK

This Handbook sets forth a new approach and revised requirements to guide localities that are carrying out a Workable Program for Community Improvement.

It represents the first major revision of the Workable Program procedures since enactment of the statutory provision in 1954.

We have several objectives which we hope will be achieved by the revision. One is to respond to the many changes that have taken place in our urban areas over the years. Another is to ensure that our requirements for the Workable Program are focused on performance by localities in dealing with the problem of slums and blight--not just on compliance with operational procedures. Above all, the purpose is to give local communities both flexibility and the responsibility to develop effective programs to achieve the objectives of the statute in light of the particular nature of problems and conditions existing in each locality.

The substitution of performance standards for certain formal elements of the Workable Program does not represent any easing in current substantive requirements. Nor does the Handbook envision any reduction in efforts by communities now participating in the program. The introduction of a performance-oriented approach hopefully will result in a more effective attack on the major problems facing the community.

I am confident that, after more than a decade of experience with the Workable Program, the Federal-local partnership has the maturity to operate effectively under the new approach of this Handbook and thereby we can make more meaningful progress toward overcoming the urgent problems facing our cities and towns today.

Robert C. Weaver Secretary

FOREWORD

This Handbook sets forth revised policies, requirements, and procedures for communities required to carry out a Workable Program for Community Improvement in connection with the use of certain Departmental housing and renewal programs to help overcome problems of slums and blight.

Workable Program Guides containing illustrative and advisory information will be issued to supplement this Handbook.

The revised policies and requirements set forth herein are effective upon issuance of this Handbook. Those communities which already have submitted or have substantially completed documentation in support of an application for certification or recertification of a Workable Program need not revise the material. However, communities may use the revised forms described in this Handbook immediately. After March 31, 1969, all applications for certification or recertification of a Workable Program must be in conformance with the revised policies and requirements.

The primary objective of the revision is to provide a flexible and performance-oriented framework within which communities may demonstrate reasonable continuing progress toward achieving the goals sought by the statutory requirement for a Workable Program and those established by the community to implement them.

The revision also modifies reporting and documentation requirements and provides new criteria for evaluating community performance.

The revised Workable Program concentrates on four essential areas:

- a. The adoption and enforcement of housing, building, and related codes.
- b. The establishment of an effective action-oriented planning and programming process.
 - c. The development of programs to meet low- and moderate-income housing needs and to meet relocation needs of families, individuals, and business concerns displaced by governmental action.

d. The involvement of citizens, including poor and minority groups, in Workable Program activities and in related HUDassisted housing and renewal programs.

The intent of this Handbook is to strengthen the Workable Program as a flexible and meaningful tool to help communities organize and carry out its community improvement programs. The Handbook envisions no lessening of effort by communities which have been participating under previous Workable Program guidelines. Rather, it is anticipated that communities will make greater progress toward achieving the objectives of the statute with the increased flexibility provided by the Handbook to concentrate local efforts and tailor specific needs and problems facing the community. Applications for certification in accordance with the requirements of this Handbook which propose a program with an overall level of effort below that made in the past, will not be acceptable.

Certifications and recertifications of Workable Programs will be effective for two years. Field reviews of progress will be made as necessary by HUD Regional Office staff midway through the certification period to provide advice and technical assistance.

HUD-assisted programs to which the Workable Program applies are listed in Chapter 1, paragraph 5. A community intending to make application for financial assistance under any of these programs should become familiar with the policies and requirements set forth in this Handbook. An understanding of these policies and requirements will facilitate the preparation of the application for certification or recertification of the community's Workable Program and thus help to expedite the processing of applications for financial assistance for specific programs.

HUD REGIONAL OFFICES

REGION	REGIONAL ADMINISTRATOR	ADDRESS AND TELEPHONE NUMBER	GENERAL JURISDICTIONAL AREA
I	Judah Gribetz	26 Federal Plaza, New York, N.Y. 10007 Area Code 212 264-8068	Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont
II	Warren P. Phelan	Widener Bldg., 1339 Chest- nut St., Philadelphia, Pa. 19107 Area Code 215 597-2560	Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania Virginia, West Virginia
III	Edward H. Baxter	Peachtree-Seventh Bldg., Atlanta, Ga. 30323 Area Code 404 526-5585	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee
IV	Francis D. Fisher	360 North Michigan Ave., Chicago, Ill. 60601 Area Code 312 353-5680	Illinois, Indiana, Iowa, Michigan, Minnesota, Nebraska, North Dakota, Ohio, South Dakota, Wisconsin
V	W.W. Collins	Federal Office Bldg., 819 Taylor St., Fort Worth, Texas 76102 Area Code 817 334-2867	Arkansas, Colorado, Kansas, Louisiana, Missouri, New Mexico, Oklahoma, Texas
VI	Robert B. Pitts	450 Golden Gate Ave., Post Office Box 36003, San Francisco, Calif. 94102 Area Code 415 556-4752	Alaska, Arizona, California, Guam, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington, Wyoming
VII	Jose E. Febres-Silva	Post Office Box 3869, GPO, San Juan, P.R. 00936 (Dial Long Distance Operator) 767-1515	Puerto Rico and Virgin Islands

WORKABLE PROGRAM FOR COMMUNITY IMPROVEMENT

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CHAPTER 1. SUMMARY OF WORKABLE PROGRAM PURPOSES AND REQUIREMENTS

1. STATUTORY PROVISION. The Housing Act of 1949, as amended, requires as a condition of certain financial assistance, the following:

". . . a workable program for community improvement (which shall include an official plan of action, as it exists from time to time, for effectively dealing with the problem of urban slums and blight within the community and for the establishment and preservation of a well-planned community with well-organized environment for adequate family life) for utilizing appropriate private and public resources to eliminate and prevent the development or spread of slums and urban blight, to encourage needed urban rehabilitation, to provide for redevelopment of blighted, deteriorated, or slum areas, or to undertake such of the aforesaid activities or other feasible community activities as may be suitably employed to achieve the objectives of such a program."

The statute also requires the adoption and effective enforcement of a minimum standards housing code, as described in Chapter 4. In addition to the Workable Program requirements contained herein, communities are advised that various HUD-assistance programs may contain additional separate requirements tailored to meet specific program needs (e.g. relocation requirements of the urban renewal program, general planning requirements for water and sewer, or open space land grants). See Chapter 3, paragraph 7, for further information.

2. BASIC PURPOSE OF STATUTORY PROVISION. The basic purpose of the Workable Program requirement is to ensure that communities desiring to utilize funds for renewal and housing programs understand the array of forces that create slums and blight and are willing to recognize and take the steps within their power to prevent and overcome urban blight.

The Workable Program is based on recognition that the Federal and local relationship is one of partnership in the task, and that Federal funds for renewal and housing projects cannot, by themselves, be effective unless localities exercise the full range of their powers in community efforts on a sustained and coordinated basis to the objective of preventing and eradicating slums and blight.

3. SUMMARY OF WORKABLE PROGRAM REQUIREMENTS. The specific requirements of the Workable Program are based on the statutory objectives described above and are designed to provide a flexible framework

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for organizing community efforts to eliminate and prevent slums and blight. The Workable Program calls for progress in the following four areas:

- a. Code Adoption and Enforcement. The adoption of housing, building, and related codes, and development of an effective code enforcement program which is at least adequate to deal with areas having high priority need for enforcement, including both blighted areas and basically sound but deteriorating neighborhoods, and which is geared toward eventual community-wide compliance with such codes.
- * b. Planning and Programming. The establishment of a continuing public planning and programming process which develops action programs within a comprehensive planning framework for overcoming the major physical, social, and economic problems related to the slum and blighted areas of the community, and for establishing and preserving a well-planned community with suitable living environment for family life.
 - c. Housing and Relocation. The development of a centralized or coordinated program for assisting in the relocation of all persons and business concerns displaced by public action in the community and the development of a program to expand the supply of housing for low- and moderate-income families on the basis of equal opportunity.
 - d. Citizen Involvement. The establishment of programs designed to achieve meaningful involvement of citizens, including poor and minority groups, in planning and carrying out HUD-assisted programs related to the Workable Program.

A detailed explanation of the policies and requirements for each of the above four areas is set forth in subsequent chapters of this Handbook.

4. LOCAL ADMINISTRATIVE REQUIREMENTS. In carrying out Workable Program responsibilities, many different local agencies and offices will necessarily be involved, together with various public and private institutions, organizations, and individuals. For example, building departments, planning agencies, health offices, housing authorities, urban renewal agencies, neighborhood organizations, private builders and developers may be involved to provide the wide range of resources needed to meet Workable Program objectives. While no specific administrative structure is required by the Workable Program, a community will be expected to meet the general requirement for establishment of an administrative mechanism

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responsible to the chief executive for the purpose of providing leadership, supervision, and coordination of Workable Program activities.

5. HUD-ASSISTED PROGRAMS FOR WHICH WORKABLE PROGRAM IS A REQUIREMENT

- a. Urban Renewal Program
- b. Neighborhood Development Program
- c. Concentrated Code Enforcement Program
- d. Interim Assistance for Blighted Areas
- e. Demolition Grant Program
- f. Community Renewal Program
- g. General Neighborhood Renewal Plan
- h. Rehabilitation loans and grants in urban renewal and concentrated code enforcement areas and in other than urban renewal or concentrated code enforcement areas assisted under the provision of Sec. 115(a)(2) and Sec. 312(a)(1).
- i. Low-Rent Housing Program, except for Section 23, Short Term Leased Housing.
- j. Mortgage insurance under FHA Sec. 220 for housing construction and rehabilitation in urban renewal project areas.
- k. Mortgage insurance under FHA 221(d)(3) at market or belowmarket interest rate projects for low- and moderate-income families.
- 1. Rent Supplement Projects under Sec. 221(d)(3) for low-income families, with certain exceptions.

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CHAPTER 2. GUIDELINES FOR EVALUATION OF WORKABLE PROGRAM APPLICATIONS

- tions will be evaluated in light of the varying conditions, backgrounds, problems, and traditions of the particular community. In view of the difficulty of establishing predetermined standards of compliance having equal applicability to all communities throughout the nation, the Department's review and determination will be guided by the statutory requirements, the adequacy of the community's proposed effort as measured against the magnitude of the job to be done, and the constraints of available Federal, State, and local resources. A second major consideration governing the evaluation of application for recertification will be evidence of reasonable continuing progress toward meeting the statutory goals and objectives and those set forth by the community.
- REQUIREMENTS FOR APPLICATION CONTENT. 2. The Workable Program is the locality's program, and it is the responsibility of the locality to establish goals, action programs, and timetables for accomplishment in each of the four elements discussed in subsequent chapters. The goals, action programs, and timetables must be approved by the Department, except where otherwise indicated in Chapter 5, paragraph 3. Because the emphasis is on the locality's responsibility to develop its own program tailored to its own needs and abilities rather than on complying with specific Departmental requirements, the community's application must contain sufficient evidence and detail to permit an objective basis for review and evaluation. Therefore, the application must clearly and specifically describe what the community intends to do during the next certification period in each of the four Workable Program elements. When applying for recertification, the application must also clearly describe what steps the community took in the last period, in order to provide a basis for measurement of the community's continuing progress toward meeting the agreed-upon goals and objectives. developing its "work program" in each of the four elements for the next certification period, the community must also show how the proposed activities are related to an analysis of the problems or needs, and to longer-range targets for accomplishment. For example, . in developing a program to meet the requirement of Chapter 6 to expand the supply of housing for low- and moderate-income families, the application should show the relationship of its proposed program and timetables to an analysis of needs in the community and to its longer-range goals or targets for expansion of such supply. The questions included in Application Form 1081 are designed to elicit the information and evidence required to provide a reasonable basis for approving or disapproving the community's Workable Program Application.

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- 3. CRITERIA FOR EVALUATION OF WORKABLE PROGRAM APPLICATION. In reviewing a community's application for certification or recertification of a Workable Program, the Department's assessment will be based on the following factors:
 - a. <u>Problem Analysis</u>. Adequacy of the community's analysis of the problems and needs where required by the Workable Program elements.
 - b. Long-Range Goals. Adequacy and reasonableness of the longrange goals and targets for accomplishment proposed by the community for overcoming such problems.
 - c. Action Programs. Adequacy of the specific actions and timetables proposed to be taken by the community during the next period of certification to deal with the problems identified, in light of available resources and the magnitude of the problems.
 - d. Progress. Demonstration of reasonable continuing progress toward meeting goals and objectives specified by the community.
- BASIS FOR DETERMINING ACCEPTABILITY. The acceptability of a community's initial application for certification will be based on the adequacy of the problem or need analysis in each of the elements, the extent to which longer-range goals or targets have been identified in relation to need, and the adequacy of the proposed action programs, in light of both need and available resources. The acceptability of an application for recertification will be based on the performance of the community in meeting the goals, targets, and timetables agreed to at the last certification, as well as on the extent to which the proposed level of effort represents continuing progress from the last period toward meeting its longer-range targets. When unexpected developments or changed conditions prevent a community from meeting its agreed-to objectives and timetables, the application for recertification must include a detailed explanation of the reasons.

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CHAPTER 3. ADMINISTRATIVE REQUIREMENTS AND PROCEDURES FOR WORKABLE PROGRAM CERTIFICATION

1. FILING OF APPLICATION FOR CERTIFICATION. Form HUD-1081 is to be used by the community to apply for certification or recertification of its Workable Program. Careful attention to the preparation of format and content will obviate the need for correspondence with the community and thus help to expedite the review and evaluation of the application and its approval.

An original and three copies of Form HUD-1081 are to be submitted to the appropriate HUD Regional Office. An application for recertification should be submitted at least 60 days prior to expiration of the community's current Workable Program certification.

A community desiring to discuss Workable Program policies and requirements or to obtain assistance and guidance in the preparation of the required Form 1081 should communicate with the HUD Regional Office.

- 2. GOVERNING BODY APPROVAL OF THE WORKABLE PROGRAM. Before being submitted to the Regional Office, the application for certification and recertification on Form HUD-1081 must be approved by the executive head and the governing body of the community.
- 3. NOTIFICATION OF APPROVAL OR DISAPPROVAL. The HUD Regional Office will advise the applicant community of approval or disapproval of the Workable Program application for certification.
 - a. Reasons for Disapproval or Conditional Approval. Applications may be disapproved or conditionally approved for either of two reasons listed below; an explanation of the basis for such action will be provided to the community.
 - (1) Failure by the community to carry out the plan of action and timetable it proposed for the last certification period. In the event of disapproval or conditional approval for this reason, the community will be advised of the actions it must take to carry out the plans or steps it initially proposed but did not take and did not provide justification for not taking.
 - (2) Inadequacy of plans, programs, and timetables proposed by the community for the next certification period. In the event of disapproval or conditional approval for this reason, the community will be informed of the nature of

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the inadequacy of its proposed plans and programs, and will be requested to submit additional information needed to remedy such inadequacies.

- b. Time Limit. Applications that are conditionally approved will provide a reasonable, definite time limit for accomplishment of required actions. In the event of a conditional approval, applications for financial assistance under the applicable HUD programs will be processed, but final approvals will be withheld until the Workable Program is fully approved. (Once a community's application is approved, no further requirements will be imposed during the period of certification.)
- 4. CERTIFICATION PERIOD. All Workable Program certifications are for a two-year period. If certification of a Workable Program has expired, the execution of contracts for assistance is precluded with respect to the applicable programs listed in Chapter 1, paragraph 5. Certification is deemed not to expire, however, but rather to continue in effect for the following purposes:
 - a. To provide Federal assistance under Title I of the Housing Act of 1949 for any urban project in the locality with respect to which a loan and grant contract is executed prior to the expiration date.
 - b. To provide Federal assistance under the United States Housing Act of 1937 for any low-rent public housing being undertaken by the locality with respect to which a contract for annual contributions or capital grant is executed prior to the expiration date.
 - c. To provide mortgage and home improvement loan insurance under Section 220 of the National Housing Act with respect to property in the locality situated in:
 - (1) The area of any urban renewal project for which a loan and grant contract is executed prior to the expiration date, or
 - (2) Any urban renewal area not involving Federal aid under Title I of the Housing Act of 1949 respecting which prior to the expiration date the Secretary of Housing and Urban Development has certified that he has approved the urban renewal plan for the area, that such plan conforms to the general plan for the locality as a whole, and that there exist the necessary authority and financial capacity to ensure the completion of such urban renewal plan.

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- d. To provide mortgage insurance under Section 221(d)(3) of the National Housing Act with respect to property in the locality for which a pre-application analysis has been made by the Federal Housing Administration and it has agreed in writing to accept a formal application prior to the expiration date, or located in the area of any urban renewal project for which a loan and grant contract is executed prior to the expiration date.
- 5. CERTIFICATION LAPSE. Where a Workable Program certification has expired and a lapse has occurred, the community will be required to show the progress made in meeting Workable Program requirements not only during the period in which the Workable Program was in effect, but also during the lapsed period. Thus, it is important that a community anticipate the expiration date and initiate the actions necessary to prepare an application for recertification sufficiently in advance of this dat so that lapse may be avoided.
- 6. TECHNICAL ASSISTANCE TO COMMUNITIES. In accordance with Section 101(d) of the Housing Act of 1949, as amended, the Department will endeavor to the maximum extent possible, to assist communities in meeting their Workable Program objectives. Field reviews of progress will be made as necessary midway through the period of certification and Regional Office staff will be available to the extent resources permit to provide consultation, advice, and technical assistance.
- 7. RELATIONSHIP OF WORKABLE PROGRAM AND URBAN RENEWAL REQUIREMENTS.

 Communities intending to apply for urban renewal assistance should be aware of the following statutory requirements:
 - a. No loan or grant contract may be entered into for an urban renewal project unless the Workable Program "is of sufficient scope and content to furnish a basis for evaluation of the need for the urban renewal project, and such project is in accord with the program."
 - b. The plan for an urban renewal project must "conform to the general plan of the locality as a whole and to the Workable Program . . "
 - c. In entering into any contract for advances for surveys, plans, and other preliminary urban renewal work, the Secretary must "give consideration to the extent to which appropriate local public bodies have undertaken positive programs (through the adoption, modernization, administration, and enforcement of housing, zoning, building and other local laws, codes, and regulations . . .) for (1) preventing the spread or recurrence

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in the community of slums and blighted areas, and (2) encouraging housing cost reductions through the use of appropriate new materials, techniques, and methods in land and residential planning, design, and construction, the increase of efficiency in residential construction, and the elimination of restrictive practices which unnecessarily increase housing costs."

d. HUD will not authorize a Federal aid contract for a Neighborhood Development Program (NDP) unless there is in existence a certified Workable Program which is of sufficient scope and content to furnish a basis for evaluation of the need for the proposed NDP activities and such activities are in accord with the Workable Program.

Communities are advised that because of the above statutory provisions, requirements for urban renewal assistance may differ from those necessary for Workable Program certification purposes in the following ways:

- a. Evaluation of Urban Renewal Need. With respect to subparagraphs a. and d., above, a community intending to apply for urban renewal or NDP assistance should ensure that the studies undertaken in connection with the planning and programming requirement described in Chapter, 5 are of sufficient scope and quality to provide a basis for evaluation of the need for the urban renewal project or NDP activities. In general, the studies carried out under the Workable Program should be adequate to determine that the area is sufficiently blighted or deteriorated to qualify for an urban renewal or NDP program. Information should be included to illustrate both building and environmental deficiencies, such as overcrowded conditions, excessive densities, and so forth. For further information on urban renewal eligibility requirements see RHA 7205.1 of the Urban Renewal Handbook, Chapter 1, General Eligibility Requirements. A community may, if it so wishes, supplement its' Workable Program submission with other related studies having a bearing, such as a Community Renewal Program, General Neighborhood Renewal Program, or other similar studies.
- b. Renewal Plans. With respect to b., above, the Urban Renewal Handbook sets forth the following minimum elements of a general plan: land use plan, thoroughfare plan, community facilities plan, public improvements program, zoning ordinance and map and subdivision regulations. The preparation of such plans (except for a zoning ordinance or other comparable memo for guiding land usage) is not a prerequisite to the approval of the Workable Program, though many communities may find the preparaof them helpful in the development of general plans to guide

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community growth and development, which is a Workable Program requirement described in Chapter 5. In addition, for purposes of approving specific urban renewal projects, a greater degree of planning completion may be required than would be necessary for Workable Program purposes, especially in smaller communities and others seeking initial certification or recertification.

- c. Codes. With respect to c., above, a community intending to apply for urban renewal assistance is advised that approval of the housing, building, and other code requirements of the Workable Program will constitute compliance for urban renewal purposes with Section 101(a) of the Housing Act of 1949, and no additional information will be required for that purpose.
- 8. AVAILABILITY OF WORKABLE PROGRAM AS PUBLIC DOCUMENT. Since the Workable Program is a public document, it must be made available for public perusal and examination. At their request, copies should be made available by the locality to citizen groups and organizations which should be encouraged to participate in the development and implementation of the Workable Program.
- 9. GUIDES. Supplementary guides will be issued to provide communities with advice and illustrations in connection with carrying out the Workable Program, including description of the scope and content of comprehensive planning programs, ways of organizing and carrying out effective relocation and code enforcement programs, and means for encouraging and developing citizen involvement. Pending issuance of the Guides, questions and requests for technical assistance should be directed to the Regional Office.

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CHAPTER 7. CITIZEN INVOLVEMENT

- REQUIREMENTS FOR CITIZEN INVOLVEMENT. A guiding principle of Departmental policy is to insure that citizens have the opportunity to participate in policies and programs which affect their welfare. Therefore, the Workable Program requires clear evidence that the community provides opportunities for citizens, including those who are poor and members of minority groups, to participate in all HUD assisted programs for which a Workable Program is a requirement, and in the community's plan to expand the supply of low- and moderate-income housing. (See Chapter 1, paragraph 5 for list of applicable HUD programs.) The community will also be expected to show what progress has been made during each certification period to achieve an adequate and effective degree of citizen involvement.
- PRINCIPLES AND PURPOSES OF CITIZEN INVOLVEMENT. The growing complexity of urban development and government organization make it essential that widespread opportunities for citizen involvement be created, including opportunities for poor and minority groups, for many reasons. In some cases, existing local institutions seem unable to identify the serious problems of many citizens, as the citizens define them. In turn, the people may feel cut off from their public representatives, and lack understanding of what government is doing to and for them. At the same time, traditional acts of participation -- voting, attendance at meetings, letters to Congressmen--are frequently ineffective in dealing with the immediate problems raised by increasingly large and complex programs having direct impact on peoples' lives. For these reasons, new forms of collaborative relationships between citizens and government, new means for participation in the decision-making process, need to be developed. Recognizing the need for experimentation and innovation, the Workable Program does not contain any specific requirements for the form that citizen participation must take. The choice of mechanisms depends upon the needs of the particular community and the structure of the local government. However, there are certain principles and objectives which should underlie the community's effort. One is that the community's responsibility does not end with the establishment of a particular mechanism or set of mechanisms. The Workable Program requires continuing effort on the part of the community to improve and expand the opportunities for creative forms of participation and collaboration that both ensure representation by poor and minority groups as well as enable government to take effective, purposeful, and expert action to deal with the problems and needs facing the community. It is essential that the participation be satisfying, rewarding, and not frustrating if it is to achieve the basic objective of creating and sustaining a voluntary union and mutual trust between governand its citizens.

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- 3. EXAMPLES OF CITIZEN INVOLVEMENT ACTIVITIES. It is important that the community develop specific plans for achieving and maintaining adequate and effective citizen involvement in the programs covered. A community may establish a new community-wide advisory committee embracing all major interests; including the poor and members of minority groups or may create several new special-purpose groups, or may make better utilization of existing organizations. Communities which already have established effective citizen advisory committees for Workable Program purposes are encouraged to retain them and improve their effectiveness. Communities participating in the Model Cities program or other programs involving a high
- * in the Model Cities program or other programs involving a high degree of citizen participation are encouraged to coordinate the citizen involvement activities under the Workable Program with the citizen participation requirements of these programs, where applicable. In addition to establishing appropriate organizational means for citizen involvement, a community may wish to take such steps as the following in order to further the objectives of this element:
 - a. The development of specific functions for citizen committees, such as having them hold public hearings, prepare comments on Workable Program applications, evaluate project plans, conduct interviews and surveys of neighborhood residents' views, etc.
 - b. The development of specific methods by which the community can establish a basis for insuring there will be fair and reasonable representativeness of advisory committees participating in the Workable Program. For example, one method by which to compose a community-wide advisory committee might be to choose representatives in equal proportions, from private neighborhood groups, government program-connected advisory groups, and civic groups.
 - c. The establishment of a planning group to help develop new ideas and techniques for generating greater involvement among poor and disadvantaged groups.
 - d. The provision of funds and technical assistance to neighborhood and other advisory groups so they may become better informed and equipped to deal with complex redevelopment problems.
 - e. The assignment of specific activities in HUD-assisted projects to designated neighborhood groups, such as evaluating site and design considerations, establishing information centers, and making recommendations with respect to housing project regulations.
- 4. CRITERIA FOR EVALUATION OF APPLICATIONS. To provide a basis for evaluating the citizen involvement element of Workable Program

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applications and for determining the adequacy of such involvement, the community will be expected to submit the following kinds of information:

- a. A description of the arrangements or working relationships established to provide citizen groups with opportunities for access to the decision-making process with respect to the related HUD-assisted projects related to the Workable Program.
- b. A description of the nature and range of issues with which the participating groups and individuals have dealt, the recommendations subsequently made, and the general results and accomplishments derived from such involvement.
- c. A description of the specific steps the community took in the preceding period and proposes to take in the next certification period to achieve or maintain an adequate and effective degree of citizen involvement, including plans for providing sufficient information, technical assistance, and access to decision-making.

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