

City of Lacey
CDBG / HOME Community Participation Plan

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LAND ACKNOWLEDGEMENT

We, the City of Lacey, are on the ancestral land of the Tribal People of the Treaty of Medicine Creek, including the Nisqually Indian Tribe and Squaxin Island Tribe. We acknowledge and remember those Tribal People not recognized today who were absorbed or relocated into other tribes for survival. We recognize the ancestors and their descendants who are still here. We recognize and respect the Tribal People of the Treaty of Medicine Creek as the traditional stewards of this land since time immemorial and their role today in taking care of these lands in perpetuity. We recognize and have the responsibility to call attention to the histories of dispossession, forced removal, and abridged treaty rights that allowed our nation, state, and city to develop as they have today. We recommend that community members read the Medicine Creek Treaty of 1854.

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I. Introduction

A. Purpose of the CDBG / HOME Community Participation Plan (CPP)

The purpose of the CDBG / HOME Community Participation Plan is to provide information about how City of Lacey (City) community members, including residents, businesses, community organizations, public agencies, faith-based organizations, public-housing residents, Continuums of Care and program participants/beneficiaries, and others, may participate in the development of the City's Consolidated Plan and related documents.

The City recognizes and values the right of all community members to be informed about and have the opportunity to comment on the use of public funds. The CPP informs the City's use of U.S. Department of Housing and Urban Development (HUD), Community Development Block Grant (CDBG) funds and HOME funds.

The documents available for public review and comment are:

- Consolidated Plan (Updated every five years)
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Substantial amendments to a Consolidated Plan and/or Action Plan; and amendments to the Community Participation Plan itself

This plan is specifically designed to encourage participation by low and moderate-income persons, particularly those living in substandard living spaces and areas and in areas where CDBG funds are proposed to be used. Low and moderate-income areas are defined as areas having more than 51% of its population with incomes at less than 80% of the area median income (commonly referred to as AMI).

The City encourages participation of all community members, including minorities, persons with limited or no English proficiency, and persons with disabilities, by providing information in alternative languages and formats when requested. The City has an extensive outline of all community participation strategies, stakeholders, and how it intends to equitably engage the community in **Appendix A** ([Lacey Human Services 2025-2027 CPP](#))

As an entitlement community, the City is eligible to receive CDBG funds from the HUD. CDBG is a formula grant provided annually to the City to develop viable urban communities principally for low- and moderate-income persons, by providing decent housing, a suitable living environment, and expanding economic opportunities.

The City participates in a HOME Consortium with Thurston County and the City of Olympia. HOME is a federal program also administered by the HUD and the Thurston County HOME Consortium receives an annual allocation of formula grant funding based on Congressional appropriations. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

The jurisdictions do not directly construct or own affordable housing but works in partnership with local nonprofit developers to fund a wide range of activities. HOME Funds can be spent anywhere in Thurston County, but must be used to benefit households that make less than 80% of area median income.

As a recipient of these entitlement program funds, the City is required to produce the following documents:

Consolidated Plan (Con Plan) – Initially the City will develop a three-year Con Plan with the assistance of the Human Services Commission (pending). Beginning in 2027, the City will develop a five-year plan with Thurston County and the City of Olympia. This plan will also be developed with the assistance and oversight of the Human Services Commission. The Con Plan identifies community needs and formulates a five-year strategic plan with objectives, implementation strategies, and outcomes that address the needs for housing, community and economic development, and human service needs of the city.

Annual Action Plan (AAP) – The Con Plan guides the development of an AAP. The AAP outlines the City's funding priorities and sets goals during the program year to address the needs identified in the Con Plan. The annual plan allocates CDBG funding to specific projects that will be undertaken over the course of the upcoming fiscal year.

Consolidated Annual Performance and Evaluation Report (CAPER) – The CAPER is an annual report that evaluates and documents accomplishments and use of CDBG funds. The performance measurements are designed to monitor all programs and to determine the impacts of the City's CDBG programs and activities.

Before a Con Plan or AAP is adopted, the City will make public the amount of funds available and the range of activities that can be undertaken with each grant, the estimated amount of funds that will be used to benefit low- and moderate- income persons.

B. Federal Requirements for Community Participation

The CPP is a required element of the Consolidated Plan for the CDBG Program, the HOME Program, and the Assessment of Fair Housing (AFH) as specified by federal regulations that can be found at [24 CFR Part 91.105](#). These regulations define how the City will ensure and coordinate public access and public participation in the decision-making process for the CDBG and HOME programs. The process includes providing opportunities for developing, reviewing and commenting on the draft Con Plan, AAP, AFH, CAPER, and CPP.

Additional regulations on the CDBG Program can be found at [24CFR Part 570](#), and regulations for the HOME Program can be found at [24 CFR Part 92](#).

C. Glossary of Terms

Annual Action Plan (AAP): The AAP describes the activities to be undertaken in the upcoming program year that meet the goals in the approved Con Plan and utilize the annual funding provided to the City by HUD.

Assessment of Fair Housing (AFH): The AFH is an analysis of fair housing issues in a program participant's jurisdiction and region that results in goals the program participant sets forth to achieve over its coming planning cycle. The AFH replaces the previously required Analysis of Impediments to Fair Housing Choice (AI).

Community Development Block Grant (CDBG): The CDBG program provides communities with resources to address a wide range of housing and community development needs that benefit very low- and low- income persons through decent housing, suitable living environments, and expanded economic opportunities.

Community Participation Plan (CPP): The CCP provides standards by which community members are encouraged to participate in the development, planning, execution, and evaluation of the Con Plan, any Substantial Amendments to the Con Plan, the AAPs, and the CAPERs.

Consolidated Annual Performance and Evaluation Report (CAPER): HUD requires the City to prepare a CAPER at the end of each fiscal year. The CAPER assesses the City's annual achievements relative to the goals in the Con Plan and the proposed activities in the AAP.

Consultation: The City will engage and/or request comments from other public and private agencies that engage directly in providing assisted housing, health services, fair housing services and enforcement, and social services, including those focusing on services to children, elderly persons, persons with disabilities, person with HIV/AIDS and their

families, and homeless persons, when completing plans and assessments related to CDBG and HOME funding priorities.

Department of Housing and Urban Development (HUD): HUD is the government agency that creates and manages programs pertaining to home ownership, affordable housing, fair housing, homelessness, community development and housing development.

Displacement: Displacement refers to the involuntary relocation of individuals from their residences due to housing development and rehabilitation activities paid for by federal funds.

Eligible Activity: Activities that are allowable uses of the federal funds (CDBG, HOME) covered by the CPP as defined in the Code of Federal Regulations Title 24 for the Department of Housing and Urban Development.

Five-Year Consolidated Plan (Con Plan): HUD requires entitlement jurisdictions to prepare a Con Plan every five years. The Con Plan identifies housing, economic, and community development needs and prioritizes funding to meet those needs.

The current Con Plan can be accessed here: [OHHP_2023_Consolidated Plan_6.3.24.pdf](#)

HOME Investment Partnerships Program (HOME): HOME is designed exclusively to create affordable housing for low-income households. Activities include those that build, buy, and/or rehabilitate affordable rental or owned housing, or provide direct rental assistance to low-income people.

Human Service Commission (Pending): The Lacey Human Services Commission (pending) makes recommendations for human services needs, human services policies, and human services funding including Community Development Block Grant funding.

Low to Moderate Income (LMI): LMI is 0–80% of Area Median Income (AMI) for a jurisdiction as defined annually by HUD. In addition, this includes those individuals presumed by HUD to be principally LMI (abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS and migrant farm workers).

Public Hearing: Public hearings provide the public, specifically LMI individuals and families, to make public testimony or comment. Public hearings are either noticed or to be advertised in local newspapers and made accessible to persons who do not speak English

or who have a disability. Public Hearings may be held at a City's Human Service Commission meeting.

Notices of hearings will typically be published ten (10) days and no less than seven (7) days prior to the hearing. Other notices shall be published and/or posted as deemed necessary by the City to inform the public of meetings, workshops, draft documents, background information or access to records and reports relating to the use of HUD grant funds. The City utilizes hybrid public hearings and commission meetings to maximize public participation. In the event of a local or national emergency, the City reserves the right to adjust the notification period as allowed by HUD waivers.

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II. How to Participate

A. Notice of Public Hearings and Review Process

Table 1

Activity/Document	When Activity Begins	Public Comment Period	How to participate and access documents
CPP	Before the Consolidated plan is written and before most engagement has begun	30 days	<ul style="list-style-type: none">• Human Services Commission (pending)• Email; humanservices@cityoflacey.org View on-line at: www.cityoflacey.org/community-development-block-grant-program <ul style="list-style-type: none">• Documents available at City Hall and may be at other public locations.

Table 1

Activity/Document	When Activity Begins	Public Comment Period	How to participate and access documents
<p>Con Plan (Five-Year Strategic Plan)</p>	<p>Starts six months preceding the coming Consolidated Plan Public Comment period</p>	<p>30 days</p>	<ul style="list-style-type: none"> • Human Services Commission (pending): Two (2) public hearings: <ol style="list-style-type: none"> 1. Public hearing on housing and community development needs, development of proposed activities, and proposed strategies and actions for affirmatively furthering fair housing; and 2. Public Hearing on the draft Con Plan and First Year Action Plan. • Summary of plan published in the newspaper of record (per 24 CFR Part 91.105(b)(2) Documents online at: www.cityoflacey.org/community-development-block-grant-program • Email: humanservices@cityoflacey.org • Documents available at City Hall and may be at other public locations.
<p>Substantial Amendments to Con Plan (Changes to the Con Plan)</p>	<p>At any point during the Consolidated Plan period</p>	<p>30 days</p>	<ul style="list-style-type: none"> • Human Services Commission (pending) Documents online at: www.cityoflacey.org/community-development-block-grant-program • Email; humanservices@cityoflacey.org

Table 1

Activity/Document	When Activity Begins	Public Comment Period	How to participate and access documents
			<ul style="list-style-type: none"> • Documents available at City Hall and may be at other public locations.
<p>Annual Action Plan (AAP) (Program Year Activity Overview)</p>	<p>Starts six months preceding the program year</p>	<p>30 days</p>	<ul style="list-style-type: none"> • Human Services Commission (pending) Documents online at www.cityoflacey.org/community-development-block-grant-program • Email; humanservices@cityoflacey.org • Documents available at City Hall and may be at other public locations.
<p>CAPER</p>	<p>November of each program year</p>	<p>15 days</p>	<ul style="list-style-type: none"> • Human Services Commission (pending) Documents online at www.cityoflacey.org/community-development-block-grant-program • Email; humanservices@cityoflacey.org

Table 1

Activity/Document	When Activity Begins	Public Comment Period	How to participate and access documents
			<ul style="list-style-type: none"> • Documents available at City Hall and may be at other public locations.
<p>AFH (Five-year assessment)</p>	<p>Approximately 12 months before the start of the Consolidated Planning process</p>	<p>30 days</p>	<ul style="list-style-type: none"> • Human Services Commission (pending)- Public hearing • Summary of plan published in the newspaper of record (per 24 CFR Part 91.105(b)(2)) <p>Documents online at: www.cityoflacey.org/community-development-block-grant-program</p> <ul style="list-style-type: none"> • Email; humanservices@cityoflacey.org • Documents available at City Hall and may be at other public locations.

B. Accessibility and Language Access

Community Members with Limited English Proficiency: The City recognizes the need to undertake reasonable actions to increase access and participation of persons with Limited English Proficiency (LEP). The City has improved LEP access to City meetings, documents, plans, and more, including:

- Launching a new website with interpretation and accessibility features.
- Adopting a Diversity, Equity, Inclusion and Belonging (DEIB) Strategic Plan
- **Forthcoming:** Language Access Plan and Branding Guide
- Launching a new legislation meeting portal to increase access to public meetings and processes.
- Streaming all public meetings online on the legislative meeting portal (with bookmarks), LaceyTV77, and YouTube. In addition, Council Meetings are also streamed on Facebook.
- Since 2021, the City has provided language interpretation services for customers and community members through LanguageLine. Every year, the use of these services has increased. Over the past four years, languages with the most demand (minutes) for interpretation services include Spanish (1,296), Korean (171), and Vietnamese (85).

Accessibility to Persons with Disabilities: The locations of all public hearings as described herein shall be made accessible to persons with disabilities. An interpreter (American Sign Language or other language) will be provided whenever the City is notified in advance that one or more persons will be in attendance, according to the instructions provided in the Public Hearing Notice. The City shall provide a qualified reader whenever the City is notified in advance that one or more visually impaired persons will be in attendance. Additionally, the City shall provide reasonable accommodations whenever the City is notified in advance that one or more persons with mobility or developmental disabilities will be in attendance.

To request an accommodation or written materials in an alternate format, contact the City Clerk at least seventy-two (72) hours before the meeting to discuss any necessary accommodations. You can reach the City Clerk by phone (360) 486-8704 or email cityclerk@cityoflacey.org.

For vision or hearing-impaired services contact the Washington State Relay Service at 7-1-1 or 1-800-833-6384.

The City provides closed captioning for public meetings on Zoom. In 2024, the City began providing automatic closed captioning on LaceyTV77, its cable and streaming service, for all public meetings. LaceyTV77 also provides limited automatic interpretation closed captioning for City Council meetings. All public meetings are broadcast on YouTube, which also provides automatic closed captioning.

C. Technical Assistance

The City shall provide technical assistance to community members with particular attention to those who are or serve LMI residents. This includes assistance in participation, planning, implementation, and assessment of CDBG programs.

Technical assistance will also be provided to groups and agencies representing LMI person in requesting assistance in developing project/funding proposals.

Technical assistance is intended to further meaningful participation in CDBG / HOME funding decisions. Technical assistance will also be utilized to foster public understanding of CDBG program requirements.

Technical assistance will be provided on request and may include, but not necessarily be limited to: interpreting the CDBG program and its rules, regulations, procedures and other requirements; providing information and/or materials concerning the programs.

III. Amendments to Plans

A. Minor Amendments

The City can amend the Con Plan, the AAP, and the AFH after adoption by following the process in the CPP (See Table 1). If a change is *not* considered a substantial amendment, the City can follow the public process for the AAP to allow for review and approval of changes that will then be reported in that program year's annual report, the CAPER.

The following will not be considered substantial amendments:

- Adjustments of allocations of program income to reflect actual (rather than anticipated) income;

- Pursuit of contingency projects identified in the AAP;
- Adjustments in project funding, provided no new projects are proposed without a substantial amendment process, and provided that the change in federal funds awarded to a project is not increased more than 30 percent or \$50,000, whichever is greater; or
- Allocation of funds which meet the Urgent Need test of HUD (e.g., existing conditions pose serious and immediate threat to health/welfare of community).

B. Substantial Amendments

If a change to the Con Plan, AAP or AFH is determined to have a more significant impact, the City must follow the public process for a substantial amendment (See Table 1). Changes to the Con Plan, the AAP, or the AFH are considered a substantial amendment if the proposed change in the use of either HOME or CDBG funds meets the following criteria:

- A change in allocation priorities, which is considered a change of federal funds awarded to a project of greater than 30 percent or \$50,000, whichever is greater;
- A change in the general location of activities;
- A major change in the scope of a project;
- The addition of a specific project which is not included as a contingency in the annual Action Plan or considered an Urgent Action;
- A material change that affects the information on which the AFH is based to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH no longer reflect actual circumstances; or
- A decision to cancel or add a project/activity (activities moved to the following year are not considered cancelled).

All substantial amendments will be subject to the same public participation requirements as outlined in Table 1.

IV. Additional Requirements

A. Anti-Displacement and Anti-Relocation Plan

As part of the CPP, the public will be advised about the City's plans to limit the displacement of persons through the CDBG and HOME program activities, and the ways the City will assist any persons who may be displaced. The Anti-Displacement and Anti-Relocation Plan is included in the Con Plan.

B. Complaint and Grievance Process

A complaint pertaining to the Con Plan, AAP, AFH, any plan amendments, and/or the annual CAPER report may be submitted to:

In writing - City of Lacey, Human Services Coordinator, 420 College St. SE, Lacey WA 98503

Via email - humanservices@cityoflacey.org

Staff will review the complaint and provide a response within a period of 15 working days of receipt of the complaint.

Appendix A. 2025-2027 Human Services Community Participation Plan



Human Services

Community Participation Plan



2025-
2027

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Human Services Community Participation Plan



INTRODUCTION

In order to assess future human services needs in the community, it is important to highlight existing and potential stakeholders and survey their experiences, opinions and recommendations for setting human services priorities. Through this engagement, the City can identify gaps, learn what is working well, improve quality and increase access to services.

It is important to approach this work with an equity lens and continue to merge the City's existing work on Diversity, Equity, Inclusion and Belonging (DEIB) with human services. This process begins by creating an equitable engagement framework. The City's recommends encouraging participation and the involvement of all community members by:

- Connecting with them in meaningful, non-performative, ways.
- Finding and engaging with community members in ways they feel comfortable.
- Reducing barriers to access and participation.

The goal of this Community Participation Plan is to engage with a broad perspective of community stakeholders, and by doing so, increase community engagement, and increase awareness. This includes people whose voices have not traditionally been recognized or heard. This approach uses a wide variety of methods such as surveys, one-on-one meetings, and focus groups. Importantly, this work is done through meeting people where they are to ensure that their voices are heard and included as part of future City decisions about funding and policies.

EXISTING HUMAN SERVICES STRATEGIES

The City provides and supports a broad range of local human services to community members. The services are targeted to alleviate hardships and help individuals in need to access community resources. The City engages in this work in four (4) distinct ways:

1. Direct social service outreach and clean-up response
2. Coordinated efforts with regional and community partners
3. Providing funding to support the work of non-profit and other governmental entities

4. Advocacy for more comprehensive solutions to homelessness at the state and federal level.

In 2024, the City invested around \$1.2 million into a variety of Human Services. Through this work, the goal of the City is to provide and support services in the community built on compassion, public safety, and enhancing the wellbeing of all. Programs and services supported prior to the needs assessment are:

- Affordable Housing and Houseless Services
- Early Learning and At-Risk Youth Services
- Senior Services
- Veterans Services
- Food Insecurity and Nutrition Services
- Hazardous Weather Sheltering Services
- Substance and Alcohol Abuse Treatment Services
- Crime Victim Advocate Services
- Dispute Resolution Services

The City continues to invest in human services by establishing a local Human Services Grant Program (HSGP). With initial funding of \$300,000, the program will provide resources to those in need in our community through an annual comprehensive, transparent and competitive application and award program (pending City Council budget approval).

As part of establishing the new HSGP, the City created an ad hoc Human Services Work Group to evaluate 2024 Grant Applications, assist with a Human Services Needs Assessment, make recommendations on future funding priorities and a future, permanent advisory board.

For the initial program year 2024, the City Council established the following priority areas:

Housing: Expanding and Upgrading Affordable Housing Programs, Emergency Rental Assistance, Housing Education, Creating and Maintaining Supportive Housing Services

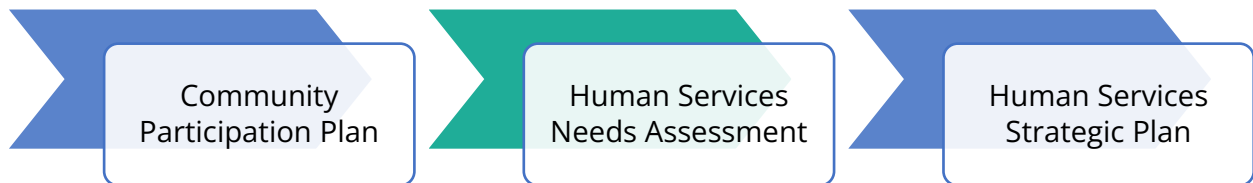
Survival: Access to Food, Water, Shelter, Sleep, Clothing

Security: Job training and placement, mental and physical health care, drug and alcohol recovery services, support in times of personal or family crisis, and transportation.

INTENDED OUTCOMES OF COMMUNITY PARTICIPATION PLAN

The City aspires to include all community members in conversations, decisions, and planning that affects them. While the City has long invested in human services in many ways, a comprehensive human services strategic plan has not been completed. The first step in designing a strategic plan is to do an analysis of stakeholders and existing resources in the community.

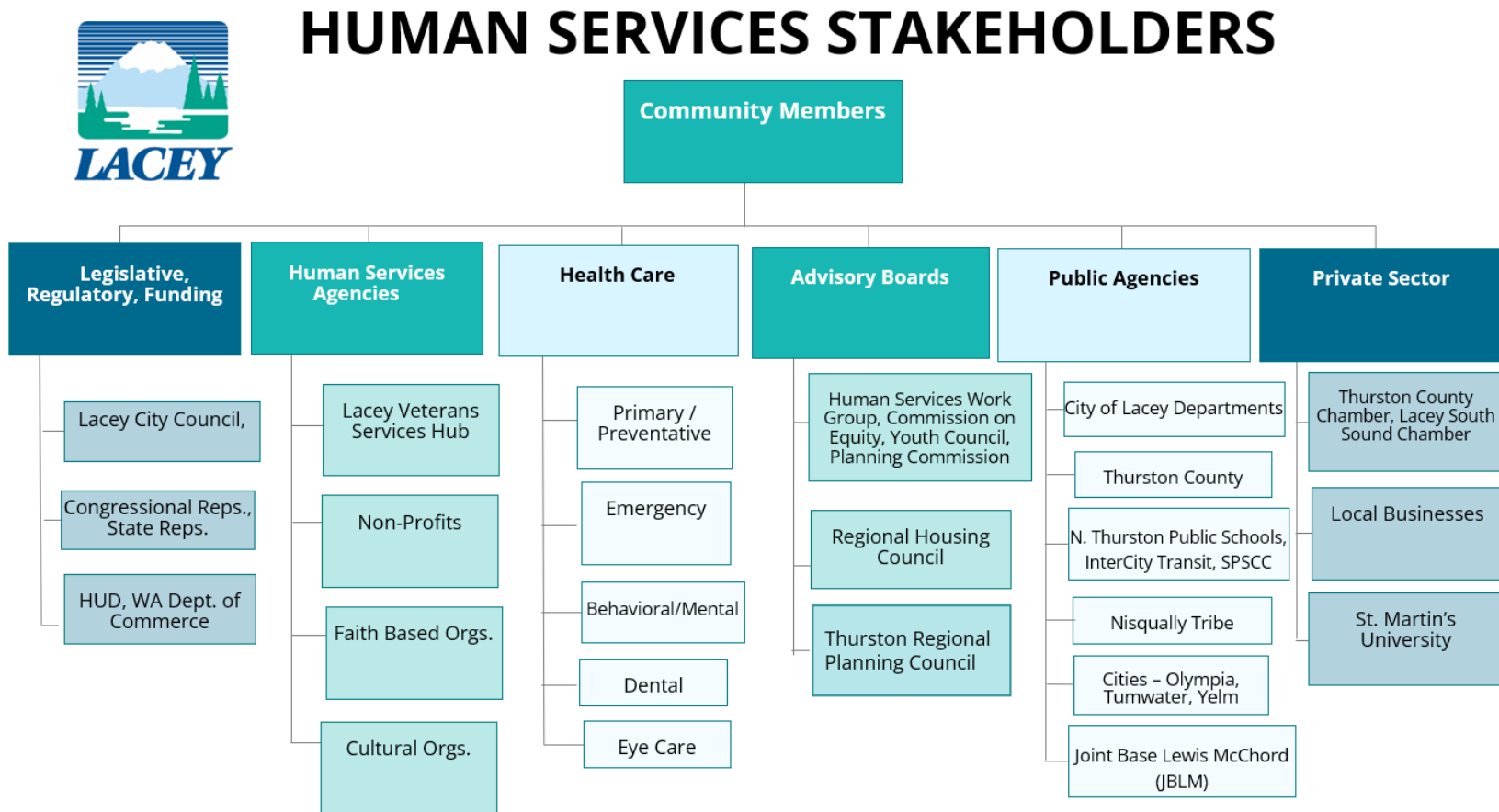
The **Community Participation Plan** will help the City gather feedback from community members and stakeholders, including the Human Services Workgroup. The feedback will inform the **Human Services Needs Assessment** which will result in a **Human Services Strategic Plan**.



IDENTIFYING AND ENGAGING STAKEHOLDERS

City staff created a list of stakeholders and resources that exist in in the Lacey community. Resources were added to this list based on existing City contracts and relationships, internet research, and information from Thurston County Community Connections, Thurston County Resource Hub, Lacey Veterans Services Hub, Family Resource Guide of Thurston County, and The Crisis Clinic of Thurston and Mason Counties.

Figure 2. Lacey Human Services Stakeholders



COMMUNITY PARTICIPATION STRATEGIES

Survey

The City developed a survey of human service needs to be open to the public online for several weeks. This survey will focus on community needs and household needs. A copy of the survey is included in **Appendix A**.

Focus groups

City staff will hold focus groups with a variety of stakeholders, such as those identified in **Figure 2** and the potential participants listed in **Table 1**.

Table 1. List of Potential Focus Group Participants

	Focus Group	Potential Participants (not exclusive and subject to change)
1	Human Services Agencies	Family Support Center, United Way, CYC, Salvation Army, Catholic Charities, CAC of Lewis, Mason, Thurston County, Homes First, Family Education Support Services (FESS), PIPE, Goodwill
2	Public Safety Agencies	Lacey Police, Lacey Fire District #3, Thurston County Sheriff, Joint Animal Services, TCOMM/911
3	Cultural Orgs. / Immigrant Orgs. / Faith Based Groups	CIELO (Centro Integral Educativo Latino de Olympia), COE (Commission on Equity), KWA (Korean Women's Association), Polynesian Association of Thurston County, Fred U. Harris Lodge #70., Phillipino American Community of South Puget Sound, Nisqually Tribe, Islamic Center of Olympia, Michiantla, The Pear Foundation of South Sound, New Life Baptist Church, ASHHO, Divine 9, Jewish and Buddhist Orgs.
4	Veterans Groups	LVSH (Lacey Veterans Services Hub), Disabled American Veterans (DAV), Thurston County Veterans Services
5	Transportation Orgs.	LVSH, Intercity Transit (including Dial-a-Lift), Thurston Regional Planning Council
6	Schools	North Thurston Public Schools (Elementary, High School, Middle School), Pope John Paul, Homeschool
7	Seniors	Senior Services of South Sound, Senior Area on Aging, A Home for Mom, Retirement Facilities – Panorama, Jubilee, Bonaventure, Senior Assoc. of LGBTQ, Rebel and Reserve Communities
8	Youth	Lacey Youth Council, Boys and Girls Club, Boy Scouts, Girl Scouts, TCYFC, BHB Youth Sports Clubs, YMCA, CYS, Daycares, Pizza Clatch (LGBTQ Youth Org.)
9	Physical / Behavioral Health Care	KP, Delta, Providence, Olympic Health and Recovery Services, NAMI, Capital Recovery Services,
10	Private Sector Employers	Lacey Chamber, South Sound Chamber, Economic Development Center, BIPOC group at the Chamber
11	City Departments	Parks, Planning, Public Works, Joint Animal Services
12	Government Agencies	Timberland Regional Library, Thurston County, Olympia and Tumwater
13	Post Secondary Education	SPSCC, St. Martins, Makers Space, ANEW, On-Line Training, Technical Training Schools, Evergreen, New Market Skills Center

Human Services Focus Group Questions

Human Services for the purpose of these conversations are centered around the following core areas: Preventative Health Care, Emergency Health Care, Behavioral Health Care, Dental Care, Eye Care, Housing, Food, Clothing, Employment and Training, Emergency Financial Assistance, Pet Care, Transportation, Child Care, Domestic Violence Services, Low or No Cost Legal Services, Senior Focused Programs, Youth Focused Programs and other services unknown.

1. Tell me about your experience with human services in Lacey?
2. Do you feel that there are gaps in human services in Lacey? If yes, explain where you see the gaps.
3. Where do you feel Lacey is doing well in terms of human services? What are the strengths in government, non-profit, and other community services?
4. Think back to a time when you were searching for services for a Lacey community member or yourself. Were the services readily available? Were you able to successfully refer the community member and get them the help they needed?
5. Thinking through this conversation, what do you feel are the highest priority human service needs in Lacey?

One-on-one questions

The City will try to interview community members who are receiving human services directly to learn more about needs, gaps and strengths within the community. One-on-one interview questions include:

1. Tell me about your experience obtaining human services in Lacey?
2. Where do you think there are gaps in human services in Lacey?
3. What do you think the highest need for human services are in Lacey?

NEXT STEPS

The next steps are direct outreach and engagement as outlined above. The City will then analyze the findings, plan implementation strategies, and determine ways to evaluate

progress. Analysis of findings will be shared with the Lacey Human Services Workgroup and the Lacey City Council.