

County of Montgomery Citizen Participation Plan

Updated June, 2020

TABLE OF CONTENTS

	<i>Page</i>
INTRODUCTION	
• A. Purpose	2
DEVELOPMENT STAGE	
• B. Developmental Mechanisms	3
• C. Availability Mechanisms	5
IMPLEMENTATION STAGE	
• D. Amendment(s) to the Consolidated Plan	6
• E. Consolidated Annual Performance & Evaluation Reporting (CAPER)	7
• F. Availability of Documents	8
• G. Technical Assistance	9
• H. Complaints	9
• I. Conclusion	10

INTRODUCTION

The HUD 5-Year Consolidated Plan is designed to help local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

Montgomery County's 5-Year Consolidated Plan describes the County's community development priorities and multiyear goals based on this assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Montgomery County is required to set forth its policies and procedures for citizen participation in the process of developing and implementing the Consolidated Plan and all its integral components such as annual action plans, annual performance evaluation reports, and any amendments. In addition, citizens may participate in the development, implementation, and evaluation of the specific activities described within the Consolidated Plan and funded through Federal programs such as the Community Development Block Grant (CDGB), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and other related programs.

Through its **Citizen Participation Plan** Montgomery County engages the community, both in the process of developing and reviewing the Consolidated Plan and as partners and stakeholders in the implementation of the Federal programs. By consulting and collaborating with other public and private entities, the County can align and coordinate community development programs with a range of other plans, programs and resources to achieve greater impact.

Montgomery County encourages participation by low- and moderate-income persons, specifically those living in slum and blighted areas; in areas where Federal funds are proposed to be used; and by residents of predominately low- and moderate-income neighborhoods.

Montgomery County further encourages the participation of residents of public and assisted housing development in the process of developing and implementing the Consolidated Plan, along with other low-income residents of targeted revitalization areas in which housing developments are located. Montgomery County provides information to the Housing Authority about any activities related to the Authority's housing developments and surrounding communities. The Housing Authority should make this information available to its residents at the annual public hearing it is required to hold under the Comprehensive Grant Program.

Montgomery County provides citizens with a reasonable opportunity to comment on this Citizen Participation Plan (including any substantial amendments to this Plan), which is a public document. It will be made accessible to those persons with disabilities and/or non-English speaking persons upon request.

A. Purpose

The Citizen Participation Plan is designed to serve the following specific purposes:

- 1) To present in a logical sequence the various components of the Consolidated Plan;
- 2) To identify the responsible departments or agencies of the County government that administer the various activities relating to the Consolidated Plan;
- 3) To clarify the opportunities which citizens, community organizations, and neighborhood groups, and others have to work with Municipal and County officials in developing each component of the Consolidated Plan and the activities within; and
- 4) To indicate the alternate courses of action which the Federal program(s) regulations make available to citizens, organizations, and local government.

Any questions or comments on substantive issues or the adequacy of the Citizen Participation Plan should be referred to:

Terence C. McMullen
Interim Program Office Administrator
Office of Housing & Community Development
Montgomery County Department of Health and Human Services
P.O. Box 311
Norristown, PA 19404-0311
TEL: 610-278-3540
E-mail: tmcmulle@montcopa.org
www.montcopa.org

Comments may also be submitted through the Montgomery County website, Montcopa.org, by following the links to Departments, Health & General Welfare, Housing & Community Development "Contact Us."

DEVELOPMENT STAGE

B. Developmental Mechanisms

To develop the Consolidated Plan (once every five years) and each subsequent Annual Action Plan (one each year for five years), Montgomery County makes information available to and also collects information from:

- 1) Citizens, Citizen Organizations, Community Groups, Neighborhood Organizations
- 2) Local governments
- 3) Public Agencies
- 4) Other interested parties

Information will be compiled for reference and made available, including:

- 1) Amount of assistance Montgomery County expects to receive with regard to:
 - a) Grant funds
 - b) Program income
- 2) Range of activities that *may* be undertaken
 - a) Including estimated amount that will specifically benefit persons of low- and moderate-income
- 3) *Plans to minimize displacement of persons
- 4) *Plans to assist any persons displaced
 - a) Types of assistance
 - b) Levels of assistance

*Even if Montgomery County expects no displacement to occur

This information is presented by Montgomery County staff at various public hearings and at informal meetings, events, or forums. Citizens may also review this information directly by appointment at the Office of Housing and Community Development, Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA 19404-0311; Phone (610) 278-3540. Additionally, information is available through the Montgomery County website, www.Montcopa.org, by following the links to Departments, Health & General Welfare, Housing & Community Development, Reports.

Adequate advance notice is given to participants (including sufficient information about the event subject matter) in order to allow for informed comment, proposals or recommendations. An event is advertised through at least one of the following method(s) (depending on event type) at least fourteen days prior to the event:

- 1) Non-legal section of those newspapers with general circulation within the County – a Notice of Hearing (for Public Hearings)
- 2) Local Access (television)
- 3) Written communications to individual citizens, groups, etc.

- 4) Written communications to those on the Office of Housing and Community Development mailing list
- 5) County Website
- 6) Other ways

All events are held at times and locations convenient to potential and actual beneficiaries. Public hearings will be held in various locations throughout the County as necessary and appropriate. Hearings will be held in the evenings or on weekends in order to allow for greater participation.

Persons who are elderly or handicapped, or who would otherwise be unable to attend, may receive transportation to these hearings if such transportation can be arranged. Such persons should contact the Office of Housing and Community Development, Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA 19404-0311; Phone (610) 278-3540; TDD (610) 631-1211. The Office of Housing and Community Development will be responsible for arranging transportation and notifying individuals of the availability of same. Such requests should be made at least two (2) working days prior to a public hearing date.

In accordance with the 2020 Coronavirus Aid, Relief and Economic Security Act (CARES Act), in emergency circumstances, in-person public hearings are not required. Montgomery County will make a good faith effort to provide an opportunity for the public to participate using whatever means are available, including electronic communications and virtual meetings. The County may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee's certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Persons, other than those addressed above, who have disabilities, will receive assistance to participate based on a case-by-case evaluation to ensure the format provided is accessible to them.

When a reasonable amount of non-English speaking citizens are expected to participate, their needs are met by providing an appropriate translator if such an arrangement can be made.

Type of Event:

- 1) Initial Public Hearing (held prior to publishing proposed Consolidated Plan and/or Annual Action Plan) – to obtain the views of citizens on:
 - a) Housing

- b) Community development needs
 - i. Priority non-housing community development needs
 - 2) Meetings
 - a) Citizens have reasonable and timely access to local meetings
 - 3) Forums
 - a) Held for specific topics and audience (i.e., Housing Coalition)

Information gathered from the above events are considered and incorporated when the County prepares the Consolidated Plan and/or associated Annual Action Plan(s).

C. Availability Mechanisms

In order to receive further public participation, Montgomery County publishes the proposed Consolidated Plan and/or associated *Annual Action Plan* so that the following may have a reasonable opportunity to examine its contents and submit comments:

- 1) Citizens, Citizen Organizations, Community Groups, Neighborhood Organizations
- 2) Local governments
- 3) Public Agencies
- 4) Other interested parties

A summary of the proposed Consolidated Plan and/or associated *Annual Action Plan* and notice of a second public hearing is published in the non-legal section of newspapers with general circulation within the County, as well as on the County website. This will be completed at least fourteen days prior to the public hearing.

The summary includes:

- 1) Content of Consolidated Plan (and/or Annual Action Plan)
- 2) Purpose of Consolidated Plan (and/or Annual Action Plan)
- 3) List of locations where entire proposed Consolidated Plan (and/or Annual Action Plan) is available
 - a) a reasonable amount of free copies will be made available

Copies of the entire proposed Consolidated Plan (and/or Annual Action Plan) are available at:

- 1) Office of Housing and Community Development
- 2) County website www.Montcopa.org
- 3) Other designated locations

Citizens will have sufficient time to review documents in order to make informed comments. Citizens will have **30 days** to make comments about the proposed Consolidated Plan and/or Annual Action Plan. Comments can be made by:

- 1) Attending 2nd Public Hearing
 - a) In writing
 - b) Verbally
- 2) Contacting Office of Housing and Community Development staff
 - a) In writing
 - b) Verbally
 - c) Responding to website, as described in Section A above

All comments and views will be considered in preparing the *final* Consolidated Plan and/or Annual Action Plan. A summary of all comments will be made part of the *final* Consolidated Plan and/or Annual Action Plan. The final Plan will also include a summary of comments not accepted and reasons therefor.

IMPLEMENTATION STAGE

D. Amendment(s) to the Consolidated Plan

In the event the County elects:

- 1) Not to complete an activity contained in the Consolidated Plan;
- 2) To complete an activity other than those described in the Plan;
- 3) To make substantial changes in priorities or distribution of funds; or
- 4) To change the purpose, scope, location, or beneficiaries of an activity;

It will afford affected citizens the opportunity to comment on any substantial changes. The following criteria will be used to determine what change(s) in the County's planned or actual activities constitute a "substantial amendment":

- 1) A national objective or goal changes (under which a project activity was proposed and approved);
- 2) The amount of program funds allocated to an activity increases by one-half (50%) or more when activity is actually undertaken;
- 3) The physical area of location of an activity is changed;
 - a) When a specific location was defined and approved
 - b) When more than one-half (50%) of the locations change under an activity with multiple locations
- 4) The class of beneficiaries change by more than one-half (50%)
- 5) Changes in the use of CDBG funds from one eligible activity to another

Citizens will be provided with reasonable notice and opportunity to comment on proposed amendments. This will be accomplished through notification of a public hearing in the non-legal section of newspapers with general circulation within the County, and notification on the County website. These notices will be published at least fourteen days prior to the hearing.

Citizens will have not less than **30 days** to make comments about the amendments prior to any amendment implementation:

- 1) By attending the Public Hearing
 - c) In writing
 - d) Verbally
- 2) Contacting Office of Housing and Community Development staff
 - d) In writing, including via the County website
 - e) Verbally

However, in accordance with the 2020 Coronavirus Aid, Relief and Economic Security Act (CARES Act), in emergency circumstances, expedited procedures may include at least (5) five days notice prior to the hearing and reasonable opportunity to comment of no less than (5) five days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans. This authority is in effect through the end of the 2020 program year

A summary of these comments as well as a summary of any comments not accepted and reasons thereof shall be attached to the Consolidated Plan and Amendment(s). The amendment(s) will then be submitted to The U.S. Department of Housing and Urban Development (HUD).

Formal County approval of the all final plans and any amendments will occur during a regularly scheduled public Board of County Commissioners meeting. Notice of such meeting will be published at least fourteen days prior to such meeting.

E. Consolidated Annual Performance and Evaluation Reporting (CAPER)

Montgomery County is required to make public annually the CAPER, a written summary and evaluation of accomplishments and performance based on the goals and activities described in the Consolidated Plan. This will be done through a public hearing, which will normally occur within the 90 days following the end of the program year. Citizens will be provided with reasonable notice and opportunity to comment on the CAPER. Reasonable notice will be through advertisement of a hearing and availability of the CAPER in the non-legal section of newspapers of general circulation within the County as well as on the County website. This notice will be published at least fourteen days prior to the hearing.

Comments can be made by:

- 1) Attending a Public Hearing
 - a) In writing
 - b) Verbally
- 2) Contacting Office of Housing and Community Development staff
 - a) In writing, including through the County website
 - b) Verbally

There is a period of *not less than 15 days* to receive comments on any CAPER prior to submission to HUD. A summary of these comments shall be attached to the final CAPER.

F. Availability of Documents

The following are available to the public upon completion:

- 1) Adopted, final **Consolidated Plan**, and all its components
- 2) Substantial Amendments, if any
- 3) Consolidated Annual Performance and Evaluation Report

These are available at:

- 1) Office of Housing and Community Development
- 2) County website
- 3) Other designated locations

The materials may be available in a form accessible to persons with disabilities. Contact the Department of Housing and Community Development staff at (610) 278-3540. In addition, the County makes available information and records relating to the development and implementation of this referenced Consolidated Plan and the County's use of funds under the various programs covered by all previous Consolidated Plans.

G. Technical Assistance

The Office of Housing and Community Development staff is available to provide technical assistance to any group which represents persons of low- and moderate-income in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. Assistance does not guarantee funding approval.

In addition, staff is available to answer questions concerning the procedures for the development and implementation of the Consolidated Plan and all of its components.

Citizens or organizations requiring technical assistance should attend the training sessions -- one for non-profits and one for municipalities -- scheduled and announced on the County website; or you may contact the Office of Housing and Community Development, Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA 19404-0311; Phone (610) 278-3540; TDD (610) 631-1211.

H. Complaints

The following procedures are followed when handling a complaint from a citizen or organization relating to the Consolidated Plan (and/or any Annual Action Plans, amendments, and CAPERs):

- 1) Timely, substantive written response to every written citizen complaint within 15 business days of its receipt, including:
 - a) County's position on the matter
 - b) Any proposed action
- 2) Responses are prepared by the Board of Commissioners via the Office of Housing and Community Development.

If the County's response does not resolve the issue to the satisfaction of the complainant, he or she may request a meeting within two (2) weeks of receiving the response. This meeting shall be held within fifteen (15) business days of receipt of this meeting request. Following such meeting, the County shall notify the complainant of its proposed resolution within fifteen (15) business days of the date of the meeting. If the complainant is not satisfied with this response, he or she may follow the procedure described below:

Citizens or organizations who have followed the procedure described above to resolve complaints may choose to file an official objection with the U.S. Department of Housing and Urban Development (HUD), Philadelphia Area Office, The Wanamaker Building, 100 Penn Square East, Philadelphia, PA 19107-3390. Persons may choose to file a complaint directly to HUD and not follow a local complaint procedure. Following the local complaint procedure is not a prerequisite for filing an objection with HUD; however, citizens are encouraged to bring complaints first to the local level for resolution, since HUD procedures require that Montgomery County respond to any complaint filed. Therefore, the best opportunity for immediate resolution to the problems remains at the County level.

Complaints should be directed to the Office of Housing and Community Development, Montgomery County Human Services Center, 1430 DeKalb Street, Norristown, PA 19404-0311. Complaints may be initially submitted via the County website, but an original, signed complaint should follow. The complaint should contain the following information:

- 1) Name and signature of the complainant or, if an organization, the name and signature of the officer of the organization, responsible for the correspondence
- 2) Address to which the County's response should be mailed or e-mailed
- 3) Telephone number and/or e-mail address where the complainant or an individual knowledgeable about the substance of the complaint may be reached during business hours
- 4) Nature of the complaint, including any relevant information or documentation
- 5) Recommendation concerning how the complainant desires to have the matter resolved

I. Conclusion

Montgomery County will follow the above-outlined Citizen Participation Plan. The requirements under this Citizen Participation Plan do not restrict the responsibility or authority of Montgomery County for the execution of the Consolidated Plan itself.