HARFORD COUNTY HOUSING & COMMUNITY DEVELOPMENT

U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT CITIZEN PARTICIPATION PLAN

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)
&
HOME PARTNERSHIP PROGRAM (HOME)

BARRY GLASSMAN
County Executive

LEONARD R. PARRISH
Director

Contents

A. INTRODUCTION 1
Purpose 1
Lead Department 1
Effective Date 1
B. ENCOURAGEMENT OF CITIZEN PARTICIPATION 2
General 2
MUNICIPALITIES, ORGANIZATIONS, AND AGENCIES 2
Encouragement of Non-English Speaking Persons and Persons with Disabilities 2
Online Access 3
Other Engagement Techniques 3
C. THE CITIZEN PARTICIPATION PLAN 3
Amendments to the Approved Citizen Participation Plan 3
D. THE ASSESSMENT OF FAIR HOUSING (AFH) 4
Plan Development 4
Revisions to the Assessment of Fair Housing 5
E. THE CONSOLIDATED PLAN (CP) 6
Plan Development 6
Revisions to the Consolidated Plan 8
F. THE ANNUAL ACTION PLAN (AAP) 9
Plan Development 9
Revisions to the Annual Action Plan 10
G. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER) 11
Report Development 11
H. AVAILABILITY TO THE PUBLIC 12
I. ACCESS TO RECORDS 12
J. COMPLAINTS 12
K. TECHNICAL ASSISTANCE 12
L. PUBLIC NOTICES 12
M. COUNTY CONTACT 13
N. APPROVAL 13

HARFORD COUNTY MARYLAND CITIZEN PARTICIPATION PLAN
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

A. Introduction

Purpose

The Consolidated Plan (CP) and Assessment of Fair Housing (AFH) are documents required by the U.S. Department of Housing and Urban Development (HUD) for jurisdictions to continue to receive federal housing and community development funding. Harford County receives Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) funding annually. The CP examines the housing and community development needs of the County, sets priorities for the CDBG funds, establishes an Annual Action Plan for meeting current and future needs, and identifies the County's performance in meeting its annual goals through the Consolidated Annual Performance Evaluation Report (CAPER).

The AFH replaces the Analysis of Impediments to Fair Housing (AI) to assist the County in identifying fair housing issues and related contributing factors to achieve comprehensive community development goals and affirmatively further fair housing. The CP and AFH are also required to have a strategy for resident participation in the planning process.

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, Harford County sets forth the following Citizen Participation Plan as it relates to the administration of the Community Planning and Development (CPD) programs funded by HUD. This Citizen Participation Plan presents the County's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

1) The Citizen Participation Plan (CPP)
2) The Assessment of Fair Housing (AFH)
3) The Consolidated Plan (CP)
4) The Annual Action Plan (AAP)
5) The Consolidated Annual Performance and Evaluation Report (CAPER), and
6) The Section 108 Loan Guarantee Program

Lead Department

Harford County Housing and Community Development is the lead department for the administration of the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs.

Effective Date

Subsequent to approval of this CPP by the County, the CP shall be effective until the plan is amended or replaced by the County.

B. Encouragement of Citizen Participation

General

The County provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the CPP, the AFH, the CP, the AAP, and the CAPER. Harford County encourages participation by low- and moderate-income persons, particularly those living in areas where CDBG and HOME funds may be used. With respect to the public participation initiatives included in this CPP, the County will take appropriate actions to encourage the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities.

Municipalities, Organizations, and Agencies

The County encourages the participation of the County's three municipalities, The City of Aberdeen, The Town of Bel Air, and The City of Havre de Grace. The County further encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing the AFH and the CP. This will be achieved through stakeholder interviews, focus groups and/or public meetings held during the development, revision, amendment, adoption and implementation processes for all documents covered by this CPP.

Local Public Housing Authority

The County encourages, in consultation with the local public housing agency, the participation of residents (including resident advisory boards, resident counsels and resident management corporations) of any public housing developments located within the County, in the process of developing, revising, amending, adopting and implementing the AFH and the CP. This will be carried out by providing to the local housing authority information on public meetings, surveys and other outreach initiatives related to the AFH and the CP.

The County will provide information to the executive director of the Havre de Grace Housing Authority (HDGHA) about the AFH, its affirmatively furthering fair housing strategy, and CP activities related to the public housing developments and communities so that HDGHA may make this information available at the annual public hearings required for its Public Housing Authority Plan.

Encouragement of Non-English Speaking Persons and Persons with Disabilities

The County will also make every reasonable effort to encourage the participation of non-English speaking persons, limited English proficiency persons, and persons with disabilities. Any non-English speaking resident who wishes to participate may contact Harford County Housing and Community Development prior to the hearings so that adequate arrangements can be made. Such requests should be made at least five (5) working days prior to the hearing date to permit the County to make the necessary arrangements.

In accordance with the Americans with Disabilities Act persons needing a special accommodation to participate in any proceeding should contact Harford County Housing and Community Development for assistance; if hearing impaired, telephone the Relay Service Number 711.

Online Access
The County will post draft and final copies of all documents covered by this CPP on its website accessible at http://www.harfordcountymd.gov/244/Housing-Community-Development

Other Engagement Techniques
The CPP has been and will continue to be amended as the County continues to gain access to technology that improves the avenues of participation by its residents.

C. The Citizen Participation Plan (CPP)

Amendments to the Approved Citizen Participation Plan (CPP)
The County shall follow the following procedure to amend its approved CPP, as needed. Harford County will provide the public with a reasonable opportunity to comment on substantial amendments to the CPP and will make the CPP public.

a. Amendment Considerations
The County will amend the CPP, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD programs. Substantial amendments to the CPP may be required should a provision of the CPP be found by the County to conflict with HUD regulations, or when changes in HUD regulations occur. Edits to the CPP that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Proposed Amended CPP Review
The proposed amended CPP will be made available for public review for a 15-day period prior to County consideration and adoption, and may be done concurrently with the public review and comment process for the CP. Upon request, the County shall make the CPP available in a format accessible to persons with disabilities.

c. Public Comments Received on Draft Amended CPP
The County Contact Person or his/her designee will accept written comments, during the public review period. A summary of all written comments and those received orally during the CP public hearing, as well as the County's responses to all such written comments, will be attached to the amended CPP prior to submission to HUD.

d. Public Hearing
The County will conduct a public hearing to review and accept public comments on the draft amended CPP prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the CP.

e. Submission to HUD

A copy of the amended CPP, including a summary of all written comments and those received during the public hearing will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

D. The Assessment of Fair Housing (AFH)

AFH Development

The County will follow the process and procedures described below in the development of its AFH.

a. HUD-approved Data for Public Review

As soon as practicable, the County will make available to the public the HUD-approved data and other supplemental information that the County plans to incorporate into its AFH. The County will make this data available no later than sixty (60) calendar days after the initiation of the AFH document.

b. Stakeholder Consultation and Citizen Outreach

In the development of the AFH, the County will consult with other public and private agencies including, but not limited to, the following:

1) Local County Municipalities
2) Local public housing authorities
3) Other assisted housing providers
4) Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
5) Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
6) Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

A variety of mechanisms may be utilized to solicit input from these entities. These include telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

c. Public Hearing

To obtain the views of the public on AFH-related data and affirmatively furthering fair housing in the County's housing and community development programs, the County will conduct at least one public hearing before the draft AFH is published for comment.

d. Public Display and Comment Period

The draft AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the content and purpose of the draft AFH, the dates of the public display and comment period, the locations where copies of the proposed document can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD.

In addition, the County will make available a reasonable number of free copies of the proposed document to residents and groups that request them.

e. Comments Received on the Draft AFH

The County Contact Person or his /her designee will accept all public comments, during the 30-day public display and comment period. The County will consider any public comments or views received in writing, or orally at the public hearings, in preparing the final AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AFH for submission to HUD.

Revisions to the Assessment of Fair Housing (AFH)

The County shall follow the following procedure to amend its AFH, as needed.

a. Revision Considerations

The County will amend its AFH previously accepted by HUD under the following circumstances:

1) A material change occurs. A material change is a change in circumstances in the County 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 Assessment no longer reflect actual circumstances. A material change includes but is not limited to:

    a. A Presidentially-declared disaster;
    b. Significant demographic changes;
    c. Substantial policy changes such as those related to zoning, housing plans or development plans or policies;
    d. New significant contributing factors in the County, and
    e. Civil rights findings, determinations, settlements (including voluntary compliance agreements), or court orders

2) Upon HUD's written notification specifying a material change that requires the revision.

b. Public Display and Comment Period
The draft amended AFH will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed Amended AFH can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD.

In addition, the County will make available a reasonable number of free copies of the proposed Amended AFH to residents and groups that request it.

c. Comments Received on the Proposed Amended AFH
The County Contact Person, or his/her designee, will accept written comments, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Amended AFH. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended AFH for submission to HUD.

d. Submission to HUD
The final Amended AFH will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

E. The Consolidated Plan (CP)

CP Development
The City will follow the process and procedures described below in the development of its CP.

a. Stakeholder Consultation and Citizen Outreach
In the development of the CP, the County will consult with other public and private agencies including, but not limited to, the following:

1) Local County Municipalities
2) Local public housing authorities
3) Other assisted housing providers
4) Social service providers including those focusing on services to minorities, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
5) Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
6) Regional government agencies involved in metropolitan-wide planning and transportation responsibilities

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, telephone or personal interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The County will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the CP draft is published for public comment, during which the County will address housing and community development needs, development of proposed activities, the amount of assistance the County expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the County will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

c. Potential Displacement of Persons

Although the County does not anticipate any residential displacement to occur in the near future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. Should displacement of residents be necessary as a result of the use of funds covered by this CP, the County shall compensate residents who are actually displaced in accordance with HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition. This resource is accessible online at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/13780 .

d. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft CP can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD. The County will make available a reasonable number of free copies of the draft document to residents and groups that request them.

e. Comments Received on the Draft Consolidated Plan (CP)
The County Contact Person, or his/her designee, will accept written comments, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

f. Submission to HUD
The CP will be submitted to HUD on or before May 15 before the County's three-year program cycle begins on July 1.

Revisions to the Consolidated Plan (CP)
The County shall follow the following procedure to amend its CP, as needed.

a. Revision Considerations
There are two (2) types of amendments that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

1) To make changes to its activity priorities or the method of distribution of funds
2) To carry out an activity using funds for any program covered by the CP but not previously described in the AAP
3) Changes in the use of CDBG funds from one eligible activity to another
4) To change the activity, purpose, scope, location or beneficiaries of an activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Development staff and will not be subject to public comments.

b. Public Display and Comment Period
The proposed Amended CP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed Amended CP can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD. In addition, the City will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Proposed Amended CP
The County Contact Person, or his/her designee, will accept written comments, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public

hearings, in preparing the final Amended CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended CP for submission to HUD.

d. Submission to HUD
The final Amended CP will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

F. The Annual Action Plan (AAP)

The AAP is a component of the CP, and it describes the County's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the County's method for distributing funds to local non-profit organizations; and the geographic areas of the County to which it will direct assistance.

AAP Development
The County will follow the process and procedures described below in the development of its AAP:

a. Public Hearings
The County will conduct at least two public hearings annually to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the AAP draft is published for public comment, during which the County will address housing and community development needs, development of proposed activities, the amount of assistance the County expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the County will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

b. Public Display and Comment Period
The draft AAP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Draft AAP

The County Contact Person or his /her designee will accept written comments, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

d. Submission to HUD

The AAP will be submitted annually to HUD on or before May 15 before the start of the County's program year on July 1.

Revisions to the Annual Action Plan (AAP)

The County shall follow the following procedure to amend its AAP, as needed.

a. Revision Considerations

There are two (2) types of amendments that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

1) To make changes to its activity priorities or the method of distribution of funds
2) To carry out an activity using funds for any program covered by the CP but not previously described in the AAP
3) Changes in the use of CDBG funds from one eligible activity to another
4) To change the activity, purpose, scope, location or beneficiaries of an activity.

All other changes to the method of distribution or investment strategy that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by Community Development staff, and will not be subject to public comments.

b. Public Display and Comment Period

The proposed Amended AAP will be placed on display for a period of no less than thirty (30) calendar days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by Harford County Housing and Community Development, and the anticipated submission date to HUD. In addition, the County will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Proposed Amended AAP
The County Contact Person, or his/her designee, will accept written comments, during the 30-day public display and comment period. The County will consider any comments or views of County residents received in writing, or orally at public hearings, in preparing the final Amended AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Amended AAP for submission to HUD.

d. Submission to HUD
The final Amended APP will be submitted to HUD within thirty (30) calendar days following the end of the public display and comment period.

G. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development
The County shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

a. Report Considerations
The Community Development staff will evaluate and report the accomplishments and expenditures of the previous program year for CDBG and HOME, and draft the CAPER in accordance with HUD requirements.

b. Public Display and Comment Period
The draft CAPER will be placed on display for a period of no less than fifteen (15) calendar days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD.

c. Comments Received on the Draft CAPER
The County Contact Person, or his/her designee, will accept written comments, during the 15-day public display and comment period. The County will consider any comments or views of County residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. Submission to HUD
The CAPER will be submitted annually to HUD no later than September 28.

H. Availability to the public

Typical or standard documents available for public access, at a minimum will include the proposed and final AFH, proposed and final revisions to the AFH, proposed and final AAP, the proposed and final Five-Year CP, proposed and final Substantial Amendments to an AAP or the CP, CAPER, and the CPP.

The County will provide copies of standard documents within a reasonable amount of time to the public upon a request. Every reasonable attempt shall be made to accommodate persons with disabilities and assist them in obtaining requested materials.

I. Access to Records

The County will provide the public with reasonable and timely access to information and records relating to the data or content of the AFH, the CP, as well as the proposed, actual, and past use of funds covered by this CPP. The law requires reasonable public access to records about previous expenditures during the past five years, and reasonable public access to records relating to the expenditure of funds during the previous five (5) program years.

J. Complaints

Residents may register complaints regarding any aspect of both the CDBG and HOME programs by contacting the County Contact Person, or his/her designee. All written complaints received will be addressed in writing within fifteen (15) calendar days.

Residents wishing to object to HUD approval of the final CP may send written objections to the HUD Area Office, Community Planning and Development Division, U.S. Department of Housing and Urban Development, 10 South Howard Street, Baltimore, MD 21201. Objections should be made within thirty (30) calendar days after the City has submitted the CPP to HUD. Objections shall include an identification of requirements not met and available facts and data.

K. Technical Assistance

Harford County Housing and Community Development staff is available to assist any person or organizations that request such assistance in commenting on the AFH and in developing proposals for funding assistance under the CDBG and HOME programs. All potential applicants are strongly encouraged to contact Harford County Housing and Community Development for technical assistance before initiating a funding request application.

L. Public Notices

All public notices will be published in the local community newspaper no less than two weeks before a public hearing or document review period, and will include a summary of the information to be presented at the public hearing. The notices shall also be posted on the Harford County Housing and Community Development website accessible at: http://www.harfordcountymd.gov/244/Housing-Community-Development

M. County Contact

All communication regarding the CPP, the AFH, the CP, the AAP, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to:

Barbara Richardson
Community Development Administrator
Harford County Housing & Community Development
15 South Main Street, Bel Air, MD 21014
Phone: (410) 638-3045 x 1362

N. Approval

This **Citizen Participation Plan will** be effective until it is amended or replaced by the County.

Barry Glassman, Harford County Executive — Date 11/6/17

Witness — Date 11.6.17

Approved:

Leonard R. Parrish — Date 10/31/2017
Director, Harford County Housing & Community Development