



**HARFORD COUNTY DEPARTMENT OF HOUSING &  
COMMUNITY SERVICES**

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

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

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Director

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

INTRODUCTION

*Purpose*

This Citizen Participation Plan has been prepared in accordance with the U.S. Department of Housing and Urban Development (HUD) regulations 24 CFR Part 91.105, Consolidated Submission for Community Planning and Development Programs, as amended.

The Citizen Participation Plan sets forth Harford County, Maryland policies and procedures for involving citizens throughout all its planning and policy development processes for programs funded with federal housing and community development funds. It outlines specific efforts made on the part of Harford County to solicit input from low and moderate income persons, persons in the protected classes, including ethnic and racial minorities, persons with limited English proficiency (LEP), public housing residents, persons with disabilities, and other special populations who may be eligible to benefit from activities financed in whole or in part using federal HUD funds and/or to benefit from the strategies resulting from the jurisdiction's Analysis of Impediments to Fair Housing (AI).

Specifically, this Citizen Participation Plan presents Harford County's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of the following:

- 1) The Citizen Participation Plan (CPP)
- 2) The Analysis of Impediments to Fair Housing (AI)
- 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 Department of Housing & Community Services 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.



## 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 AI, 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 Local Public Housing Authority*

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 AI 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.

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 AI 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 AI and the CP.

The County will provide information to the executive director of the Havre de Grace Housing Authority (HDGHA) about the AI, 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 Department of Housing & Community Services 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 Department of Housing & 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.

### THE CITIZEN PARTICIPATION PLAN (CPP)

#### *Amendments to an Approved Citizen Participation Plan (CPP)*

The County will follow the process and procedures described below to amend its approved CPP, as needed.

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.

## THE ANALYSIS OF IMPEDIMENT S TO FAIR HOUSING CHOICE (AI)

### *AI Development*

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

a. Stakeholder Consultation and Citizen Outreach

In the development of the AI, 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.

b. Public Hearing

To obtain the views of the public on AI-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 AI is published for comment.

c. Public Display and Comment Period

The draft AI 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 AI, 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 Department of Housing & Community Services, 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.

d. Comments Received on the Draft AI

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 AI. 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 AI for submission to HUD.

*Revisions to the AI*

The County will follow the process and procedures described below to revise its approved AI, as needed.

a. Public Display and Comment Period

The proposed Amended AI 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 AI can be examined, how comments will be accepted, when the document will be considered for action by Harford County Department of Housing & Community Services, and the anticipated submission date to HUD.

b. Comments Received on the Proposed Amended AI

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 AI. 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 AI for submission to HUD.

c. Submission to HUD

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

THE CONSOLIDATED PLAN (CP)

*CP Development*

The County 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 Analysis of Impediments to 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.

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 Department of Housing & Community Services, 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 five-year program cycle begins on July 1.

*Revisions to the Consolidated Plan (CP)*

The County will follow the process and procedures described below to revise its approved 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 Department of Housing & Community Services, 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 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.

## THE ANNUAL ACTION PLAN (AAP)

### *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 Analysis of Impediments to 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 Department of Housing & Community Services, 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 will follow the process and procedures described below to revise its approved 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 Department of Housing & Community Services, 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.

## DISASTERS, EMERGENCY EVENTS AND URGENT NEEDS

### *Disasters, Emergency Events, and Urgent Needs*

In the event of a declared disaster or emergency, it may be necessary to expedite substantial amendments to the Annual Action Plan. These amendments may include funding new activities and/or the reprogramming of funds, including canceling activities to meet needs resulting from a declared disaster or emergency. Therefore, the County may utilize CDBG or HOME funds to meet these needs with a 5-day public comment period instead of a 30-day public comment period (otherwise required for substantial amendments).

### *Urgent Needs*

To comply with the “Urgent Needs” National Objective, activities undertaken in response to disaster or emergency events will meet community development needs having particular urgency. These activities will alleviate existing conditions that the County certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;\*
- Are unable to be financed by the County on its own.

\*A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the County’s certification.

In the event of certain disasters or emergencies HUD may provide waivers and or alternative requirements relative to public notification processes. In such events, the County will avail itself of any provided that will help in expediting notifications for the delivery of assistance to the community.

In the event that national or local health officials recommend social distancing and/or limited public gatherings for public health reasons, virtual or web-based hearings will be used in lieu of in-person hearings. If this format is used accommodations for real-time responses, timely responses from local officials to all citizen questions and issues, public access to all questions and response, and accommodations for persons with disabilities or limited English proficiency will be made to the greatest extent possible.

## CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT (CAPER)

### *Report Development*

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

### 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 AI, 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.

### 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 AI, 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.

### 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.

### TECHNICAL ASSISTANCE

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

### 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 Services website accessible at:

<http://www.harfordcountymd.gov/244/Housing-Community-Development>

### COUNTY CONTACT


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

Barbara W. Richardson, Director  
Harford County Department of Housing  
& Community Services  
15 South Main Street, Bel Air, MD 21014  
Phone: (410) 638-3045 x 1362

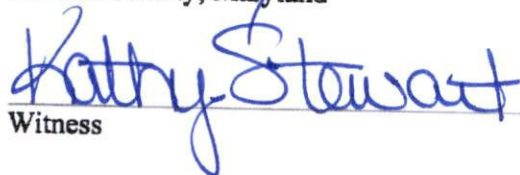


APPROVAL

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

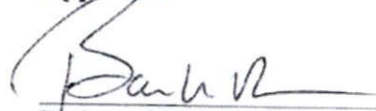
  
Robert G. Cassilly, County Executive  
Harford County, Maryland

4-10-2024  
Date

  
Witness

4-10-2024  
Date

Approved:

  
Barbara W. Richardson, Director  
Department of Housing & Community Services

4/2/2024  
Date