



# Delaware County, PA

CITIZEN PARTICIPATION PLAN

## A. Introduction

### Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the Urban County of Delaware (County) sets forth the following amended Citizen Participation Plan (Plan) as it relates to the administration of the community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Plan presents the County's strategy for providing for and encouraging all citizens of the County to participate in the development, revision, amendment, adoption and implementation of:

1. The Citizen Participation Plan (Plan)
2. The Consolidated Plan (ConPlan)
3. The Annual Action Plan (Action Plan)
4. The Consolidated Annual Performance and Evaluation Report (CAPER)
5. The Assessment of Fair Housing (AFH)

### Lead Agency

The County Office of Housing and Community Development (OHCD) administers the County Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant Programs (ESG). The CDBG, ESG and HOME Programs cover the entire County except for the CDBG entitlement communities of Chester City, Haverford Township and Upper Darby Township. Chester City receives HOME funds directly from HUD.

Any questions or comments on the plan should be referred to OHCD at:

County of Delaware  
Office of Housing and Community Development  
2 West Baltimore Avenue; Room 202  
Media, PA 19063  
Email: [ohcd@co.delaware.pa.us](mailto:ohcd@co.delaware.pa.us)  
Website: <http://www.co.delaware.pa.us/hcd/>

Telephone: (610) 891-5425    TDD 1-800-654-5984    Fax: (610) 566-0532

### Effective Date

This plan will be re-evaluated periodically, updated when necessary and maintained by the Office of Housing and Community Development (OHCD). This Plan shall be effective until it is amended or otherwise replaced.

## **B. Encouragement of Citizen Participation**

### General

Citizen Participation requirements are designed to encourage citizens to participate in the development, revision, amendment, adoption and implementation of the Plan, the ConPlan, Action Plan, the AFH and the CAPER. The County encourages participation by low and moderate-income persons, with emphasis on participation by persons of low and moderate income, and persons who are residents of slum and blighted areas where CDBG, HOME or ESG funds are proposed to be used and by residents of predominately low and moderate-income neighborhoods. Public Participation procedures outlined in this plan are designed to ensure that the County will take appropriate actions to encourage the participation of all of its citizens, including minorities, non-English speaking persons, and persons with disabilities as described below.

### Low and Moderate-Income Persons

The County encourages the participation of all individuals, local and regional organizations, the Continuum of Care, businesses, developers, nonprofit organizations and community and faith-based organizations serving low and moderate-income persons in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, public meetings and stakeholder groups.

### Non-English Speakers

American Community Survey data reveals that the non-English speaking population is concentrated in Millbourne Borough, E. Lansdowne Borough, Upper Darby Township, and Colwyn Borough. Of these municipalities, Upper Darby Township has their own separate community development program. Marple Township, Radnor township, Chadds Ford Township, Upper Providence Township, Swarthmore Borough, Yeadon Borough, Clifton Heights Borough, Rose Valley Borough and Edgemont Township have percentages of non-English speaking population greater than the County percentage (11.8%).

### Persons with Disabilities

The County will make reasonable accommodations and service necessary for sensory-impaired and disabled citizens at the public meetings. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the County Clerk at least five working days in advance of the meeting at [coogana@co.delaware.pa.us](mailto:coogana@co.delaware.pa.us) or (610) 891-4260. TDD 1-800-654-5984.

### Public Housing Authority

The County, in conjunction with the DCHA, encourages the participation of residents of public housing in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The County will provide information to DCHA via public notices so that they may make this information available at the annual public hearings required for its Agency Plan.

### Provision of Technical Assistance

The County's OHCD staff is available to assist eligible organizations and individuals wishing to submit program applications, as staff time permits. Technical assistance consists of answering questions verbally or in writing about the procedures, timetables and preparation of the applications. This includes information on the eligibility of proposals under federal regulations or other federal requirements (e.g., environmental policies), information concerning application development, program implementation or final assessments, and; furnishing information about the preparation of proposals for CDBG, HOME and/or ESG funding

### Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the Philadelphia Inquirer – Delaware County Edition and advertised on the OHCD web page no less than ten days prior to the date the public hearing is held.

### Public Hearings

County residents and organizations, as well as those affected by the Consolidated Plan, will be given an opportunity to acquire information about the Plan and express their views on the development of the Consolidated Plan at public hearings. At a minimum, two hearings will be held per year. Citizen's views and proposals will be solicited at the first public hearing for the development of the draft Consolidated Plan; comments and suggestions on the proposed Plan will be considered at the second hearing.

Such hearings shall be held at times and locations convenient to potential or actual beneficiaries, and with accommodation for persons with disabilities.

## **C. The Citizen Participation Plan**

### Citizen Participation Plan Amendment

The county may substantially amend the Plan from time to time, as necessary to ensure adequate engagement and involvement of the public. Substantial amendments may be required when a provision of the Plan has been found to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public comment.

The County shall follow the procedures below when amending its Plan.

1. **Public Review of the Draft Plan**  
The Draft Plan will be made available for public review for a 15-day period prior to its adoption. The draft plan will be available for review on at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)
2. **Comments received on the Draft Plan**  
Written comments will be accepted by the County's Director of OHCD, or a designee, during the 15-day public review period. Comments should be directed to [OHCD@co.delaware.pa.us](mailto:OHCD@co.delaware.pa.us)
3. **Submission to HUD**  
A copy of the amended Plan, including a summary of all written comments as well as the County's responses and proof of compliance with the 15-day public review and comment period requirement will be submitted to HUD.

#### Plan Access

The approved Citizen Participation Plan and any amendments will be kept on file and is available for review at the offices of OHCD and at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)

#### Emergency Provisions

In the event of local, state or federally declared disaster or emergency where public or in -person participation may not be feasible or large gatherings are considered a public health risk, the public comment for amendment to the Plan shall be no less than five days. Notice will be provided via the website at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)

### **D. The Consolidated Plan (ConPlan)**

#### Plan Development

The county will follow the procedure described below in the development of its ConPlan.

1. **Stakeholder Consultation and Citizen Outreach**  
In the development of the ConPlan, the County will consult with the County Departments of Human Services, Emergency Services, Intercommunity Health, and other public and private agencies including but not limited to the following:
  - Social service providers who focus on delivering services to minorities, low- and moderate-income households, families with children, the elderly, persons with

disabilities, persons with HIV/AIDs and their families, homeless persons and other protected classes.

- The Delaware County Redevelopment Authority/Commerce Center
- Other assisted housing providers
- The Delaware County Continuum of Care
- The Fair Housing Council of Southeastern PA
- COMCAST

When preparing the portion of the ConPlan concerning lead-based paint hazards, the County shall consult with the Delaware County Health Department and the Delaware County Lead Coalition and examine existing data related to lead-based paint hazards and poisonings, including date of housing units in which children have been identified as lead poisoned.

When preparing the description of priority non-housing community development needs, the County will notify adjacent units of local government by sending a letter to the chief elected official notifying them of the draft ConPlan and how to access a copy online for review and comment.

A variety of mechanisms may be used to solicit input including written letters, telephone or in-person interviews, surveys, focus groups and/or workshops.

## 2. Public Hearings

The County will conduct at least two public hearings in the development of the ConPlan. The first hearing will be conducted before the draft Con Plan is issued for public comment, by OHCD staff and will serve to:

- Accept testimony from residents on the housing and community needs in Delaware County
- Summarize program requirements
- Answer questions about the Consolidated Plan, from development of the Consolidated Plan to final evaluation
- Obtain views and suggestions from citizens at the beginning stage of preparing the Consolidated Plan
- Discuss the proposed Consolidated Plan's strategies and actions for Affirmatively
- Furthering Fair Housing and ensure they are consistent with the AFH

This hearing will provide citizens and community organizations an opportunity to express their views on subjects including but not limited to the following:

- Community development needs and priorities
- Housing needs and priorities
- Information concerning past activities
- The range of eligible activities
- Affirmatively Furthering Fair Housing

A second hearing will be held will be held at a regularly scheduled County Council meeting to provide citizens and organizations an opportunity to comment on the County's proposed ConPlan during the 30-day public comment period.

### 3. Displacement

Displacement of person(s) by federally funded activities is discouraged. Proposals that may involve displacement are required to meet with OHCD staff during the application process. If displacement is unavoidable on a temporary or permanent basis, the County will comply with the federal Uniform Relocation Act. Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the County shall compensate residents who are displaced in accordance with HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition.

### 4. Public Display and Comment Period

Upon completion of the proposed ConPlan, the draft document will be placed on public display for a period of no less than 30 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the proposed ConPlan will appear in the non-legal section of the Philadelphia Inquirer – Delaware County Edition at least thirty (30) calendar days prior to the adoption of the Plan and will indicate the locations at which the Plan will be made available for public review. The public notice shall include:

- A summary and purpose of the ConPlan
- The total amount of funds expected to be available to the County for housing and community development activities, including program income, if any
- The range of activities that may be undertaken with these funds
- The estimated amount of funds proposed to be used for activities that will benefit low and moderate-income persons
- The possibility of residential and/or commercial displacement resulting from program implementation and the plans for minimizing such displacement, and the types and levels of assistance to be made available to persons displaced by contemplated activities.
- How comments will be accepted
- Dates when the document is expected to be consider for action by County Council and the anticipate submission date to HUD.

5. Comments on the Draft ConPlan

Written comments will be accepted by the Director of the OHCD or designee 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 ConPlan. 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 ConPlan for submission to HUD.

6. County Council Action

Following the public hearing and 30-day public display and comment period, the ConPlan will be presented to County Council for final approval.

7. Submission to HUD

The ConPlan shall be submitted to HUD no less than 45 days prior to the start of the five -year program cycle.

Amendments to the ConPlan

The County shall follow the procedures below to revise is ConPlan, as necessary.

1. Considerations

There are two types of amendments that may occur with the ConPlan: minor amendments and substantial amendments. An amendment to the approve ConPlan is considered substantial under the following circumstances:

- When an eligible activity is added
- When there is a change in the identified priorities

Changes that do not meet the criteria defined above are considered minor amendments and will be reviewed and approved by the OHCD director and not subject to public comment or action by County Council.

2. Public Display and Comment Period

The draft Amended ConPlan will be placed on public display for a period of no less than 30 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the Amended ConPlan will appear in the non-legal section of the Philadelphia Inquirer – Delaware County Edition at least thirty (30) calendar days prior to the adoption of the Plan. The public notice shall include:



- A summary of revisions
- Dates of the public display and comment period
- How to submit comments
- The method/location at which the Plan will be made available for public review
- Date, time and location of Public Hearing

### 3. Public Hearing

During the comment period, the County will conduct a public hearing to review and accept public comments on the draft Amended ConPlan prior to its approval and submittal to HUD.

### 4. Comments Received on the Draft Amended ConPlan

Written comments will be accepted by the Director of the OHCD or a designee during the 30-day public 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 ConPlan. 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 ConPlan for submission to HUD.

### 5. County Council Action

Following the public hearing and 30-day public comment period, the Amended ConPlan will be presented to County Council for final approval.

### 6. Submission to HUD

The ConPlan shall be submitted to HUD following the end of the comment period and adoption by County Council.

## Emergency Provisions

In the event of local, state or federally declared disaster or emergency where public or in-person participation may not be feasible or large gatherings are considered a public health risk, the County may opt to conduct public hearings and meetings via online platforms. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. In the event of an emergency, the following procedures may be instituted by the County:

- The length of the public comment and display period for any plan or plan amendment shall be no less than five (5) days unless less time is permitted via HUD waiver and notice will be provided via the website at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)
- Draft documents for public review and comment will be shared at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd).
- When possible, copies will be emailed upon request

- Public meetings may be held as virtual meetings for public viewing with the option to provide comment and questions ahead of time or during the meeting and responses will be provided in real time

These emergency provisions shall apply to all documents covered by this plan.

#### Plan Access

The approved Citizen Participation Plan and any amendments will be kept on file and is available for review at the offices of OHCD and at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)

### **E. The Annual Action Plan (Action Plan)**

The Action Plan is a component of the ConPlan, and it describes the County's proposed use of available federal and other resources to address the priority needs and specific objectives in the ConPlan for each program year; the County's method for distributing funds to municipalities and subrecipients and the geographic areas of the County to which it will direct assistance.

#### Plan Development

The County will follow the process and procedures described below in the development of its Action Plan

##### 1. Public Hearings

The County will conduct at least two public hearings in the development of the ConPlan. The first hearing will be conducted before the draft Action Plan is issued for public comment, by OHCD staff and will serve to:

- Hear testimony on housing and community development needs
- Inform attendees on the amount of assistance the County expects to receive (including program income) and the estimated amount that will benefit low and moderate income residents
- Explain the range of activities that may be undertaken with program funds
- Provide a review of program performance

Each municipal government who applies for CDBG funding is required to conduct a hearing in their community prior to submitting funding proposals to the County. Hearings will be held in the evening or on weekends. Notice of these hearings will specifically note and explain the CDBG program on the agenda and will be printed in the legal section of a newspaper of general circulation. These notices should be published at least 10 days before the public hearings.

A second hearing will be held at a regularly scheduled County Council meeting to provide citizens and organizations an opportunity to comment on the County's proposed Action Plan during the 30-day public comment period.

## 2. Public Display and Comment Period

The proposed Action Plan will be placed on public display for a period of no less than 30 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the proposed Action Plan will appear in the non-legal section of the Philadelphia Inquirer – Delaware County Edition at least thirty (30) calendar days prior to the adoption of the Plan and will indicate the locations at which the Plan will be made available for public review. The public notice shall include:

- A summary Action Plan
- Anticipated amounts of available funding
- Dates of the public display and comment period
- How to submit comments
- The method/location at which the Plan will be made available for public review
- Date, time and location of Public Hearing
- Estimate of when the document will be considered for County Council action
- The anticipated submission date to HUD

## 3. Comments on the Proposed Action Plan

Written comments will be accepted by the Director of the OHCD or designee 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 ConPlan. 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 ConPlan for submission to HUD.

## 4. County Council Action

Following the public hearing and 30-day public display and comment period, the ConPlan will be presented to County Council for final approval.

## 7. Submission to HUD

The ConPlan shall be submitted to HUD no less than 45 days prior to the start of the County's annual program year.

### Amendments to the Action Plan

The County shall follow the procedures below to revise its Action Plan, as necessary.

## 1. Considerations

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

- When an eligible activity is added or deleted
- When there is a 25% change in the purpose, location or beneficiary of an activity
- When there is a 25% change in federal funding occurs

Changes that do not meet the criteria defined above are considered minor amendments and will be reviewed and approved by the OHCD director and not subject to public comment or action by County Council. The OHCD Director will notify HUD of any minor amendment to the Action Plan at the end of the program year.

## 2. County Council Action

Any request to substantially amend the Action Plan will be initiated by the Delaware County Council via an approved Agenda Action to commence a 30-day comment period.

## 2. Public Display and Comment Period

The proposed Action Plan will be placed on public display for a period of no less than 30 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the Amended ConPlan will appear in the non-legal section of the Philadelphia Inquirer – Delaware County Edition at least thirty (30) calendar days prior to the adoption of the Plan. The public notice shall include:

- A summary of revisions
- Dates of the public display and comment period
- How to submit comments
- The method/location at which the Plan will be made available for public review
- Date, time and location of Public Hearing

## 3. Comments Received on the proposed Amended Action Plan

Written comments will be accepted by the Director of the OHCD or a designee during the 30-day public comment period. The County will consider any comments or views of county residents received in writing in preparing the amended Action Plan. 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 ConPlan for submission to HUD.

## 4. Submission to HUD

The Amended Action Plan will be submitted to HUD following the end of the comment period.

## Emergency Provisions

In the event of local, state or federally declared disaster or emergency where public or in-person participation may not be feasible or large gatherings are considered a public health risk, the County may opt to conduct public hearings and meetings via online platforms. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. In the event of an emergency, the following procedures may be instituted by the County:

- The length of the public comment and display period for any plan or plan amendment shall be no less than five (5) days and notice will be provided via the website at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)
- Draft documents for public review and comment will be shared at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd).
- When possible, copies will be emailed upon request
- Public meetings may be held as virtual meetings for public viewing with the option to provide comment and questions ahead of time or during the meeting and responses will be provided in real time

## Plan Access

The approved Citizen Participation Plan and any amendments will be kept on file and is available for review at the offices of OHCD and at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)

## **F. Consolidated Annual Performance and Evaluation Report (CAPER)**

The CAPER is a component of the ConPlan, and it describes the County's performance in carrying out the goals and activities set forth in the ConPlan and annual Action Plan.

### Plan Development

#### 1. Public Display and Comment Period

The proposed CAPER will be placed on public display for a period of no less than 15 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the proposed Action Plan will appear in the non-legal section of the Philadelphia Inquirer-Delaware County Edition. The public notice shall include:

- A purpose of the CAPER
- Dates of the public display and comment period
- How to submit comments
- The method/location at which the CAPER will be made available for public review

#### 2. Comments on the Proposed CAPER

Written comments will be accepted by the Director of the OHCD or designee 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 ConPlan for submission to HUD.

3. Submission to HUD

The CAPER shall be submitted to HUD no less than 90 days following the last day of the County's annual program year.

Emergency Provisions

In the event of local, state or federally declared disaster or emergency where public or in-person participation may not be feasible or large gatherings are considered a public health risk, the County may opt to take advantage of any extensions permissible by HUD waiver.

Plan Access

The approved Citizen Participation Plan and any amendments will be kept on file and is available for review at the offices of OHCD and at [www.co.delaware.pa.us/hcd](http://www.co.delaware.pa.us/hcd)

**G. ASSESSMENT OF FAIR HOUSING (AFH)**

Plan Development

The County has prepared a five-year Assessment of Fair Housing (AFH) that aids in meeting long-standing fair housing requirements required in the use of HUD funding. The AFH will serve to help analyze the challenges and barriers to fair housing facing the county and to establish goals and priorities in overcoming those challenges.

Revisions to the AFH

The County shall follow the procedure below to revise its AFH, as needed

1. Revision Considerations

Revisions to the county Assessment of Fair Housing Plan will occur under the following circumstances:

- A Material Change Occurs. A Material Change as defined by HUD is a significant event or change in circumstances in the county that impacts or alters the information on which the AFH is based. Revisions in result of Material Changes will be submitted to HUD by OHCD within 12 months of the onset of the Material Change.
- Upon Written Notification by HUD of a Material Change. HUD may submit to the County notification that a Material Change has occurred that warrants revision to the AFH. HUD will specify the deadline for submission of the revision.

2. Public Display and Comment Period

Proposed revisions to the AHF will be placed on public display for a period of no less than 30 days to encourage public review and comment prior to County adoption. A public notice announcing the availability of the revised AFH will appear in the non-legal section of the Philadelphia Inquirer – Delaware County Edition at least thirty (30) calendar days prior to the adoption of the Plan. The public notice shall include:

- A summary of revisions
- Dates of the public display and comment period
- How to submit comments
- The method/location at which the Plan will be made available for public review

3. Comments Received

Written comments will be accepted by the Director of the OHCD or designee during the 30-day public display and comment period. The County will consider any comments or views of county residents received in writing in revising the AFH and provide written responses to all written complaints and grievances, which are not anonymous and have a complete mailing address. Responses will be provided within fifteen (15) working days where practical.

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.

3. Submission to HUD

The AFH shall be submitted to HUD after expiration of public comment period and approval from County Council within the timelines identified by HUD.

Plan Access

The approved Citizen Participation Plan and any amendments will be kept on file and is available for review at the offices of OHCD and at <https://delcopa.gov/hcd/consolidated.htm>

**H. Complaint Procedure**

Any individual or organization may issue a complaint about the County's CDBG, HOME, ESG and related programs or the administration of these programs. Complaints should be sent to the Director of the Delaware County OHCD. The complaint must contain:

1. The name and signature of the complainant or, if any organization has prepared the complaint, the name and signature of the officer of the organization issuing the complaint.
2. The address to which the County's response should be mailed.
3. A telephone number or email address where the complainant can be reached during daytime hours.
4. The nature of the complaint, including any pertinent information and/or supporting evidence.
5. A recommendation of how the complainant wishes to have the matter resolved.

The County will make every effort to provide a written response to a complaint within fifteen (15) working days of its receipt. The County will not respond to any anonymous or fictitious complaints.

Persons wishing to object to HUD approval of the final Consolidated Plan; Annual Action Plan; Consolidated Annual Performance and Evaluation Report or AHF may send written objections to the HUD field office at:

U.S. Department of Housing and Urban Development  
Pennsylvania State Office  
Philadelphia Regional Office  
The Strawbridge's Building  
801 Market Street  
Philadelphia, Pennsylvania 19107-3380