

LEHIGH COUNTY, PENNSYLVANIA CITIZEN PARTICIPATION PLAN



Adopted by the County Commissioners

May 2007

Revised April 2020 – CARES Act

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Prepared By: Lehigh County Office of Community Development



Table of Contents

SECTION I – INTRODUCTION..... 2

SECTION II – PURPOSE 2

SECTION III – ENCOURAGEMENT OF CITIZEN PARTICIPATION 3

SECTION IV – DEVELOPMENT OF FIVE-YEAR CONSOLIDATED PLAN & ANNUAL ACTION PLAN... 4

SECTION V – CONSOLIDATED PLAN AMENDMENTS 5

SECTION VI – PERFORMANCE REPORTS 7

SECTION VII – PUBLIC HEARINGS / MEETINGS 7

SECTION VIII – PUBLIC NOTICE..... 8

SECTION IX – AVAILIBLTY TO THE PUBLIC 9

SECTION X – ACCESS TO RECORDS 10

SECTION XI – COMPLAINTS 12

SECTION XII – AMENDMENTS TO THE PLAN..... 13

SECTION XIII – EMERGENCY DECLARATIONS 13



SECTION I – INTRODUCTION:

The Office of Community Development of Lehigh County is the administrating agency of the Federal Grants for Lehigh County. It is responsible for the County’s Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). In accordance with federal regulation 24 CFR § 91.105 for Citizen Participation Plan, local governments, and federal entitlement jurisdictions must adopt a Citizen Participation Plan and update the plan as necessary.

The Board of Commissioners of Lehigh County adopted its initial Citizen Participation Plan in May 2007. It was last modified in April 2020 in response to The CARES Act authorizing Emergency Declaration for Citizen Participation to expedite the Modification Processes.

Based on changes to The Federal Programs and the County becoming a Participating Jurisdiction under The HOME Program, Lehigh County has updated and revised its Citizen Participation Plan accordingly.

SECTION II – PURPOSE:

The purpose if this Citizen Participation Plan is to provide citizens within Lehigh County a guide for their involvement in the Federal Entitlement Programs funded through the U.S. Department of Housing and Urban Development (HUD).

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

- To encourage the participation of all residents, community-based and faith-based organizations, social service agencies, housing providers, economic and community development groups, public and private non-profits, businesses, educational and financial institutions, etc. in the planning and implementation process of the five-year consolidated plan.
- To present in a logical and clear manner the various components and requirements of the federal entitlement programs.
- To identify the responsible departments, or agencies in the Lehigh County Government who will be responsible to administer the Entitlement Programs.
- To clarify and identify the opportunities that individual residents, community organizations, and neighborhood groups have to work with Lehigh County officials and staff in developing the five-year consolidated plan, its annual action plan and performance reports which show the accomplishments of the programs.
- To indicate the alternate courses of action that the federal regulations provide to citizens, organizations, and other stakeholders.



- To act as a coordination vehicle for citizen participation to be used by all agencies, officials, and staff who are responsible for various components of the County's Five-Year Consolidated Plan and its Annual Action Plan.

SECTION III – ENCOURAGEMENT OF CITIZEN PARTICIPATION:

Lehigh County has prepared and adopted its Citizen Participation Plan to establish its policies and procedures for citizen participation. The Citizen Participation Plan provides for and encourages citizens to participate in the development of a consolidated plan, any substantial amendments to the consolidated plan, annual action plans, and the annual performance and evaluation report. The plan is specifically designed to encourage participation by low-and-moderate income persons, particularly those residents in neighborhoods that are predominately low-and-moderate income as defined by Lehigh County. Lehigh County will take appropriate actions to encourage participation of all citizens, including; minorities, the disabled, and non-English speaking persons.

Lehigh County also encourages the participation of local and regional institutions, the Continuum of Care, and local private and non-profit organizations, including businesses, philanthropic organizations, housing providers, social service agencies, educational and financial institutions, as well as community-based and faith-based organizations.

Lehigh County will encourage, in conjunction with the local public housing agencies (PHA), the participating residents of publicly assisted housing developments, including resident advisory boards, resident councils and resident management corporations, in the process of if developing implementing and amending (if necessary) the five-year consolidated plan or annual action plan. Other low-income residents of targeted revitalization areas in which public and/or assisted housing is located, will also be encouraged to participate in the consolidated planning process. Lehigh County shall make an effort to provide information to the public housing authorities about affirmatively furthering a fair housing strategy of the consolidated plan activities that may be related to development in surrounding communities, so that the public housing authorities can present this information at its public hearing for the PHA Plan.



SECTION IV – DEVELOPMENT OF THE FIVE-YEAR CONSOLIDATED PLAN AND ANNUAL ACTION PLAN:

HUD has revised and amended its regulations and procedures to apply for entitlement funds. It has consolidated the planning and applicant process for the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons With AIDs (HOPWA) into a single application. The new consolidated plan document is known as the Consolidated Plan. This plan is for a five (5) year period and each year the County prepares its Annual Action Plan on how it proposes to expend its funds in conformance with the goals and objectives of the Five-Year Consolidated Plan. HUD has also consolidated the reporting requirements for these programs into one annual performance report known as the Consolidated Annual Performance and Evaluation Report (CAPER).

The County's Citizen Participation Plan includes the following requirements for the development of the Consolidated Plan as required by federal regulations:

- **Application Development** – Prior to the submission of the Five-Year Consolidated Plan, Annual Action Plan, a Section 108 Loan Guarantee Application, and other applications for CDBG, HOME, or other federal funds, and amendments to previously approved plans and applications. The County will notify residents, neighborhood organizations, and other interested parties about the application requirements; eligibility of project activities; timetable for submission; funding amounts; range of activities that may be undertaken; estimated benefit to persons of low-and-moderate income; and other information necessary to involve residents in the development of plans and applications.
- **Program Progress** – Prior to the development of annual application for CDBG and HOME funds, the County will report to the public on the progress that the County has made on its expenditure of funds at public meetings, public hearings, and through the local news media.
- **Program Implementation** – Resident involvement may take the form of advisory committees, direct involvement, self-help efforts or other types of citizen participation during the program implementation process. The roles that residents and other stakeholders of the County will play in the implementation of CDBG and HOME programs includes, attendance at meetings, call-ins, write-ins, etc.
- **Monitoring Evaluation** – Opportunities for residents to monitor and evaluate the County's CDBG and HOME progress will be consistent and continuous. The following methods are available as follows: direct contact with staff, direct contact between staff and groups, and direct contact between residents and elected / appointed officials.



- **Submission of Views and Proposals** – The submission of views and proposals, especially from low-and-moderate income persons, minority groups, and other persons or organized groups can be made on a continuous basis and are encouraged to the greatest extent possible. Submission can be in the form of personal contact; mail, email, and telephone contact; petitions; attendance at public hearings / meetings; through questions and surveys; and other available means. Responses to all submissions shall be in a timely manner and shall not exceed a period of fifteen (15) working days after the voicing of the comment, or the date of receipt of a written comment or inquiry.

Individuals submitting comments by mail should use the following mailing address:

Ms. Laurie A. Moyer
Grants Management Specialist
Lehigh County Government Center
17 South Seventh Street
Allentown, PA 18101-2401

Complaints Submitted by phone or electronically should use the following:

Phone – (610) 782-3565

Fax – (610) 871-2755

Email - laurie.moyer@lehighcounty.org

SECTION V – FIVE-YEAR CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS:

During the course of implementing the Five-Year Consolidated Plan and Annual Action Plan, the County may decide to make changes to its approved budget and/or activities. When a substantial change or substantial amendment to the Five-Year Consolidated Plan and Annual Action Plan is proposed, the following will be followed.

- **Definition** – A substantial amendment is defined as:
 - A change in the allocation of priorities, National Objectives, or a change in the method of distribution of funds.
 - A proposal to undertake a new activity not previously described in the Annual Action Plan.
 - A change in the purpose, scope, location, or beneficiaries of a previously approved activity.



- The use of program income that was not previously allocated to an eligible activity.
- The deletion or elimination of a previously approved activity.
- The use of contingency or unprogrammed funds in a given year.
- **Criteria** – the criteria used to determine what constitutes an amendment is based on the following:
 - The original purpose for which the activity was selected has changed including the category of the National Objective selected.
 - The size or scope of work of the project activity or program has increased or decreased which changes the cost of the activity or program by more than 50% of the total original budgeted dollar amount for that activity or program.
 - The location of the project activity or program had to be relocated to a different site.
 - A new activity is proposed which was not previously approved.
 - A previously approved project is proposed to be deleted or cancelled.

If any of the above criteria apply, then a substantial amendment to the Five-Year Consolidated Plan or Annual Action Plan has occurred.

- **Procedure** – a description of the substantial amendment to the Five-Year Consolidated Plan or the Annual Action Plan will be published in the local newspaper of general circulation. A period of not less than thirty (30) calendar days will be provided to receive citizen comments prior to the approval of the substantial amendment by the Board of County Commissioners. The newspaper notice shall include the date, time, and place of the public hearing, along with a description of the proposed substantial amendment.
- **Comments** – The County will consider any comments or views of citizens that it receives in writing or orally at the public hearing and during the time the Substantial Amendment is on public display. A summary of any comments or views will be incorporated into the Substantial Amendment, as well as a narrative of any comments or views not accepted and the reasons they were not accepted.
- **Approval** – The Substantial Amendment will be presented to the Lehigh County Executive after the public hearing for review and approval. The County Executive will consider the amendment after it has been advertised and/or on public display for a period of at least 30 calendar days. After approval of the Substantial Amendment by the County Executive, the Lehigh County Office of Community Development shall submit the Substantial Amendment to the HUD-Philadelphia Office with a signed letter of transmittal by the County Administrator.
- **Revisions** – The County may make a revision to its approved Five-Year Consolidated Plan and Annual Action Plan if it does not meet the criteria of a substantial amendment. A revision is defined as a change in the budget for activities that do not substantially change the scope or beneficiaries, it is not a new activity, nor a deletion, of a previously approved



activity and its less than a 50% reduction or increase in the line-item budget for that activity. Revisions do not require the thirty (30) day public display period nor a public hearing.

SECTION VI – PERFORMANCE REPORTS:

All federal entitlements are required to file an annual performance report to HUD. HUD requires that a Comprehensive Annual Performance and Evaluation Report (CAPER) be filed with HUD within ninety (90) calendar days after the end of the Grantee's Fiscal Year. The Lehigh County Office of Community Development will publish in the local newspaper of general circulation in the area a notice informing the public that the County has prepared the CAPER, and it is available for view and comment for a period for at least fifteen (15) calendar days. The fifteen (15) days commence from the day after publication. The public has fifteen (15) calendar days to make comments prior to the submittal of the CAPER to HUD.

The Lehigh County Department of Community & Economic Development will consider comments, or views of residents, received in writing or orally, concerning the CAPER. A summary of the comments or views shall be included in the CAPER. After approval of the CAPER, the Lehigh County Office of Community Development will file the CAPER with the HUD-Philadelphia Office.

SECTION VII – PUBLIC HEARINGS / MEETINGS:

All public hearings and meetings will be held in a timely manner and shall be accessible to all segments of the County's population, including accommodations for persons with disabilities. The Public Hearings and meetings shall be held at a time and place that is convenient and accessible to all persons who wish to participate.

Public hearings shall be held at least two (2) times per year at different stages of the program year for the purpose of obtaining residents' views on the development of needs, the review of proposed activities, and review of program performance. At least one (1) public hearing must be held during the planning process in the development of the Five-Year Consolidated Plan, Annual Action Plan, all Section 108 Loan Guarantee Applications, and other program applications.

The Public Hearing notices shall be published at least ten (10) calendar days prior to the hearing date and shall be advertised in the local newspaper of general circulation.

The first public hearing will serve the purpose of providing a summary of program requirements, answering questions about the Annual Action Plan process, handled on a chronological basis, that is, from development of the application to final evaluation, and to obtain views and review proposals of citizens and organizations at the initial stage of preparation of the program.



This initial hearing is meant to obtain the views of citizens and organizations regarding overall community development and housing needs, development of proposed activities, including the estimated amount that will benefit persons of low and moderate income, and to review program performance.

The intent of this meeting(s) will be to provide a mechanism for citizens participation at the County-wide, municipal and neighborhood level. Comments or recommendations on projects in specific localities will be encouraged.

This hearing will be conducted by the Office of Community Development, which is responsible for preparation of the application.

Notice of the hearing will appear in the legal section of a newspaper of general circulation within Lehigh County. The notice shall be published at least ten (10) calendar days prior to the public hearing.

In the event that non-English speaking residents will be expected to attend public hearings, translation assistance will be provided so they may participate effectively in the hearing. If the Department of Community and Economic Development is notified within three (3) business days prior to the public hearing, it will make arrangements to accommodate non-English speaking residents, including having a translator present at the public hearing or meeting. Also, a summary of the minutes of the public hearing will be translated in another language for the benefit of non-English speaking residents. Spanish translations of all public notices, surveys, etc. will be provided to those residents who do not speak or read English.

SECTION VIII – PUBLIC NOTICE:

A legal notice will be published in the local newspaper of general circulation in the County that the proposed Five-Year Consolidated Plan and Annual Action Plans will be on public display for a period of not less than thirty (30) calendar days in order to receive citizen comments prior to approval by the governing body.

Copies of the proposed plans will be available at the following locations:

- **Department of Community and Economic Development**
 - Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401
- **Catasauqua Public Library** – 302 Bridge Street, Catasauqua, PA 18032
- **Coplay Library** – 49 South 5th Street, Coplay, PA 18037
- **Emmaus Public Library** – 11 East Main Street, Emmaus, PA 18049
- **Lower Macungie Library** – 3400 Brookside Road, Macungie, PA 18062
- **Parkland Community Library** – 4422 Walbert Avenue, Allentown, PA 18104
- **Slatington Library** – 650 Main Street, Slatington, PA 18080



- **Southern Lehigh Public Library** – 3200 Preston Lane, Center Valley, PA 18034
- **Whitehall Township Public Library** – 3700 Mechanicsville Road, Whitehall, PA 18052
- **On the county website at www.lehighcounty.org**

- **Executive Summary**
 - Included in the Plans will be an Executive Summary of the proposed plan which describes the contents, purpose, and a list of the locations where copies of the entire proposed Five-Year Consolidated Plan and Annual Action Plan may be examined. In addition, a reasonable number of free copies of these Plans will be made available to citizens or groups that request it.

- **Comments**
 - Lehigh County will consider any comments or views of citizens received in writing or orally at the public meetings/hearings in preparing the final Five-Year Consolidated Plan, Annual Action Plans, and Section 108 Loan Applications. A summary of all comments not accepted and the reason, therefore, shall be attached to the final Five-Year Consolidated Plan and Annual Action Plans.

SECTION IX – AVAILABILITY TO THE PUBLIC:

A second hearing will be undertaken when the draft application for funding has been prepared.

Upon completion of the proposed Annual Action Plan, Lehigh County shall publish the proposed Plan or summary of the Plan in sufficient time to permit citizens to comment on the Plan prior to its approval and adoption by the County. The notice will appear in the legal section of papers of general circulation at least thirty (30) calendar days prior to the adoption of the Plan and will include the locations of where the Plan will be made available for public review.

The second hearing will be conducted during the thirty (30) day review period of the proposed Action Plan or Five-Year Consolidated Plan. The notice of this second hearing may be combined with the notice of availability of the Draft Plan. However, the notice must allow at least ten (10) calendar days from the date of the publication prior to the date of the hearing.

This hearing will be conducted by the Office of Community Development. Public Hearings will be held at times and locations that are convenient to potential and actual beneficiaries of the proposed programs or activities. Public Hearings will be held in the Lehigh County, Government Center, 17 South Seventh Street, Allentown, PA 18101-2401. The Five-Year Consolidated Plan or Annual Action Plan will also be posted on the County's website: www.lehighcounty.org.

At the time that planning begins for each year, organizations within Lehigh County will have the opportunity to submit comments, proposals, or recommendations on the Community



Development Block Group Program, HOME Program, and other Federal Programs. Any residents or property owners in Lehigh County or any organization representing Lehigh County residents or property owners may participate.

Such a comment, proposal or recommendation may be directed to the attention of Laurie A. Moyer, Grants Management Specialist, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565, email: lauriemoyer@lehighcounty.org. All written statements received, will receive a written response back no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. However, written statements that are intended to suggest modifications to the application can only be considered if they are received by the end of the thirty (30) day review period on the draft Annual Action Plan or Five-Year Consolidated Plan.

SECTION X – ACCESS TO RECORDS:

The County shall provide full public access to the CDBG and HOME program information and affirmative efforts to provide adequate information to residents, especially those who are low-and moderate-income, and those who are residing in predominantly low-and moderate-income neighborhoods or slum and blighted neighborhoods. Information shall be provided on the Community Development Block Grant Program, HOME Investment Partnerships Program, Section 108 Loan Guarantee Program, and all other programs, as applicable, including at a minimum the following:

- At the time when the County begins its Community Development Block Grant Program, HOME Program, Section 108 Loan planning process, and any other programs, as applicable, including:
 - Total amount of funds available, including program income;
 - The range of activities that are eligible or ineligible, including the estimated amount that will benefit persons who are low-and moderate-income;
 - Plans to minimize displacement and to assist any persons displaced, specifying the types and levels of assistance the County will make available to persons displaced, even if the County anticipates no displacement. The Five-Year Consolidated Plan must state when and how the County will make this information available;
 - The process that will be followed in developing and approving the projects or programs;
 - The standards of participation and goals for the Citizen Participation Program; and
 - Summary of important program requirements.
- Upon request, copies of all materials relating to the Community Development Block Grant Program, HOME Investment Partnerships Program and all other programs, as applicable,



will be made available to any persons and/or group for the cost of copying only, particularly documentation concerning the following:

- All mailing, promotional materials, and news releases;
 - Key documents, including all prior applications, letters of approval, performance and program evaluation reports, and any other applications, proposed or approved, or reports required by HUD;
 - Copies of CDBG and HOME Programs regulations;
 - Information on contracting and purchasing procedures, environmental policies, fair housing, equal opportunity, relocation provisions, the 24 CFR Part 58 environmental review process, affirmative action and any other requirements or regulations relating to the CDBG and HOME programs; and
 - Costs of copying will be as established by local and state laws.
- The submission of views and proposals from low-and moderate-income persons, minority groups, and any other persons or organized groups can be on a continuous basis and shall be encouraged to the greatest extent possible. Submissions can be in the form of:
 - Personal contact;
 - Mail, email, and telephone contact;
 - Petitions;
 - Attendance at public meetings/hearings;
 - Through questionnaires and surveys; and
 - Other available means.
 - The submission of views and proposals shall be an on-going process and at a minimum during the following stages:
 - The planning process;
 - The annual HUD application process; and
 - The implementation process.

Responses to all submissions shall be in a timely fashion and shall not exceed a period of fifteen (15) days after voicing of a comment, or the date of receipt of a written comment or inquiry.

Individuals submitting comments by mail should use the following mailing address:

Office of Community Development

Lehigh County Government Center

17 South Seventh Street

Allentown, PA 18101-2401



SECTION XI – COMPLAINTS:

Any individual or organization may choose to file a complaint concerning Lehigh County's Entitlement Programs. Complaints should be forwarded to Laurie A. Moyer, Grants Management Specialist, Lehigh County Government Center, 17 South Seventh Street, Allentown, PA 18101-2401, telephone: (610) 782-3565 or, email: lauriemoyer@lehighcounty.org. The complaint should contain the following information.

- The name and signature of the complaint, or if any organizations have prepared the complaint, the name and signature of the officer of the organization responsible for correspondence.
- The address to which Lehigh County's response should be mailed.
- A telephone number where the complaint or an individual knowledgeable about the substance of the complaint can be reached during daytime hours.
- The nature of the complaint, including any relevant information or documentation.
- A recommendation concerning how the complainant wishes to have the matter resolved.

The Office of Community Development will make every reasonable effort to provide a written response to a complaint within fifteen (15) working days of its receipt. Lehigh County will indicate its position on the matter and the action it proposes to take. The Office of Community Development will not be obligated, however, to respond to any anonymous or fictitious complaints.

If the Office of Community Development's response does not resolve the problem to the satisfaction of the complainant, he, or she within two (2) weeks of the response by the Office of Community Development may request a meeting with the appropriate officials within the Lehigh County Office of Community Development, to resolve the problem. This meeting, whenever possible, shall be held within fifteen (15) working days of receipt of the request for a meeting. Following such a meeting Lehigh County shall notify the complainant of its proposed resolution within ten (10) working days of the date of the meeting. If the complainant feels that the response is still not satisfactory, the complainant may follow the procedure described in the following section:

The above complainant procedure shall not be considered a prerequisite for persons or organizations wishing to file objections to applications pursuant to Federal regulations.

Individuals or organizations who have followed the procedure described above to resolve complaints may choose to file an official objection with the U.S. Department of Housing and Urban Development, Philadelphia Regional Office, Wannamaker building, 100 Penn Square East, Philadelphia, PA 19107-3380. Persons may choose to file a complaint directly with HUD and not follow the local complaint procedure established in #6 above. Following the local complaint procedures is not a prerequisite to filing an objection with HUD. However, citizens are encouraged to bring complaints first to the local level for resolution since HUD procedures require Lehigh



County to respond to any complaint filed with HUD. Therefore, the best chance for immediate resolution to the problem rests at the County level.

SECTION XII – AMENDMENTS TO THE PLAN:

Lehigh County will provide residents with the opportunity to comment on this Citizen Participation Plan. Copies of this proposed Citizen Participation Plan will be available at the Lehigh County Government Center, Office of Community Development, and the County website www.lehighcounty.org. A public notice will be published in the local newspaper of general circulation in the County for a period of fifteen (15) days calendar days prior to the adoption of the Citizen Participation Plan by Lehigh County in order for residents to comment on the plan. Copies of the Citizen Participation Plan will be made available upon request, in a format accessible to persons with disabilities. Substantial amendments to this plan will follow the same procedure as the adoption of the original plan.

Revisions, amendments, and changes may be made to the Citizen Participation Plan at any time. Residents will be afforded the opportunity to comment on any amendments to the Citizen Participation Plan. A notice of the proposed amendments to the Citizen Participation Plan will be published in the local newspaper of general circulation in the area, informing the public of the availability of the Citizen Participation Plan and its proposed changes. The County will advertise once and will notify residents that they have a period of up to fifteen (15) days from the date of the newspaper notice to respond to the proposed changes in the Citizen Participation Plan.

SECTION XIII – EMERGENCY DECLARATIONS:

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of Pennsylvania and regulatory flexibility is permitted by HUD, Lehigh County will adhere to the following process concerning public hearings and public display of plans when necessary for public health reasons. These emergency procedures will apply to the Five-Year Consolidated Plan, Annual Action Plan Substantial Amendments, and initial plan submissions, as permitted through a regulatory waiver authority or programmatic flexibility:

- If the County is unable to hold an open public hearing in person, the County will be allowed instead, to hold virtual public hearings through conference calls or an online video conference call platform, as long as the public is able to provide comments during the virtual public hearing.
- If the County is not able to physically place the plans on public display at the locations referenced in the Citizen Participation Plan, the county will put the plans on the County's website (www.lehighcounty.org) and will also email copies of the plans to any person who requests a copy of the plans via an email request.
- If HUD has waived the public comment period for substantial amendments to the Consolidated Plan/Annual Action Plan from thirty (30) to a lesser number of days, the number of days may be reduced.



- If HUD has waived the public comment period for the Consolidated Plan and Annual Action Plan submission from thirty (30) to a lesser number of days, the number of days may be reduced.
- All other requirements relative to the County's Citizen Participation Plan for Consolidated Plans remain in effect, including the consultation requirements, as required by 24 CFR 91.105.