

ORANGE COUNTY, NORTH CAROLINA CITIZEN PARTICIPATION PLAN

PURPOSE: The purpose of this Citizen Participation Plan is to create a process for citizens to participate in planning and reporting processes for Orange County’s Federal funds for housing and community development, including the HOME Investment Partnerships Program (HOME) funds, as well as other funds awarded by the U.S. Department of Housing and Urban Development (HUD). This Citizen Participation Plan is written in accordance with the Consolidated Plan regulations found in 24 CFR 91.105.

BACKGROUND: Orange County receives Federal funds for housing, including funds from the HOME Program, which provides formula grants to states and localities, called Participating Jurisdictions, to fund a wide range of affordable housing activities including building, buying, and/or rehabilitating affordable housing for rent or ownership. In Orange County, the Participating Jurisdiction is a Consortium, known alternately as the HOME Consortium or the Local Government Affordable Housing Collaborative (referred to herein as the “Collaborative”). The Collaborative consists of Orange County and the Towns of Carrboro, Chapel Hill, and Hillsborough, with the County acting as lead entity. The Collaborative coordinates the funding process for the HOME program, accepts and reviews applications from local nonprofits, and presents recommendations to the elected bodies of each jurisdiction for funding approval.

CONTACT INFORMATION: Citizens may make comments or request information regarding this Citizen Participation Plan or any Federal program and its associated plans and reports—such as the Consolidated Plan, Annual Action Plan, Assessment of Fair Housing (AFH), and Consolidated Annual Performance Evaluation Report (CAPER)—by telephone, mail, or email to:

Orange County Department of Housing and Community Development
P.O. Box 8181
Hillsborough, North Carolina 27278
(919) 245-2490
HousingHumanRightsCD@orangecountync.gov

The Department will respond in the Consolidated Plan, Annual Action Plan, AFH, CAPER, or other document, as appropriate, to written comments received.

MEETINGS AND PUBLIC HEARINGS: During the development of the Consolidated Plan and any substantial amendments, Annual Action Plan, and AFH, and prior to the submission of the CAPER, Orange County will solicit the views and proposals of citizens and interested groups and agencies at meetings and public hearings.

Notices for meetings and public hearing shall include:

1. The subject of the meeting;
2. Amount of funds anticipated to be available and range of eligible activities;
3. Estimated benefit to low and moderate-income persons;
4. Information needed by citizens to make informed comments, or in the case where extensive information will be the subject of comment, where the information is available for inspection;
5. Time and location of the meeting;

6. The address and telephone number where special populations (persons with disabilities or non-English speaking persons) may request auxiliary aids or assistance;
7. The address where written comments may be submitted, and the time frame of the comment period for the subject of the meeting;
8. The telephone number where persons may request additional information.
9. A telephone number for constituents to call in to the public meeting if they are unable to travel.

Notices: Adequate advance notice of meetings will be given. Notices will be published in newspapers of general circulation no less than 10 days and no more than 25 days prior to the beginning of any series of hearings or meetings. Notices will be posted on the Orange County website (www.orangecountync.gov). Notices will also be mailed and or emailed to local advocacy groups, nonprofit housing organizations, housing-related service providers, for-profit developers, professional organizations, other known constituency groups, and citizens who have requested notification.

Format: Meetings will be designed to allow the most opportunity and encouragement for residents to express their views. At least one meeting, whether in person or virtual, will follow the format of a formal public hearing, while the County is identifying its housing and community development needs prior to writing the Consolidated Plan.

Accessibility: Meetings will be held at times and locations convenient to potential and actual beneficiaries. All meeting places will be handicapped accessible. Auxiliary aids, such as interpreters, will be provided upon request.

DEVELOPMENT OF THE CONSOLIDATED PLAN AND THE AFH: Orange County will develop a complete Consolidated Plan, including needs assessment, strategic plan, action plan, and certifications every five years. The County will hold a series of meetings to solicit resident views and proposals on housing and community development needs before the proposed consolidated plan is published for comment. The County will publicize and conduct these meetings as described in the **“Meetings and Public Hearings”** section.

Orange County will publish its proposed Consolidated Plan for comment prior to submitting it to HUD. A summary of the proposed plan will be published in newspapers of general circulation, along with a list of places where the entire proposed plan may be examined. The summary will also be sent to local advocacy groups, nonprofit housing organizations, housing-related service providers, for-profit developers, professional organizations, other known constituency groups, and citizens who have requested notification. The entire plan will be available on the Orange County website. A hard copy of the plan, in reasonable numbers, will also be provided to citizens or groups that request it. The proposed plan will contain information including the amount of assistance the County expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced. At, or as soon as feasible after, the start of the public participation process, the County will make the HUD-provided data and any other supplemental information the County plans to incorporate into its Consolidated Plan and AFH available to its residents, public agencies, and other interested parties. At least one meeting or hearing will be held on the draft, publicized and conducted as described in the **“Meetings and Public Hearings”** section.

Orange County will receive comments from residents on the proposed consolidated plan for a period of not less than 30 days. The comment period will be publicized in the notices published in the newspaper and mailed to interested parties. Any comments received in writing or orally at the public hearings will be considered in preparing the final Consolidated Plan. The final Consolidated Plan will include a summary of these comments or views and the reasons for not accepting any comments received.

Action Plan: Orange County will develop an Annual Action Plan each year for the use of its funds and submit this plan with certifications. In the years in which the Annual Action Plan is directed by the five-year needs assessment and strategic plan, the County will hold hearings or meetings, publicized and conducted as described in the **“Meetings and Public Hearings”** section. The County will receive comments from residents on the proposed action plan for a period of not less than 30 days from the date when the draft is available to the public. The comment period will be publicized in the notices published in the newspaper and mailed to interested parties. Any comments received in writing or orally at the public hearings will be considered in preparing the final submission. The final Annual Action Plan will include a summary of these comments or views and the reasons for not accepting any comments received.

Amendments: Orange County will amend its Consolidated Plan prior to making any of the following decisions:

1. To change the method of distributing funds or the priorities for allocation;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan;
3. To change the purpose, scope, location, or beneficiaries of an activity from what was proposed in the original plan; or
4. To change the amount of funds reserved for a particular funding category or activity, unless the change is made in accordance with conditions and procedures specified in the original Consolidated Plan.

The County will receive comments from residents on the proposed substantial amendment for a period of not less than 30 days, unless waived by HUD during disasters, public health emergencies, or other federally designated emergencies. The opportunity to comment will be publicized and posted on the Orange County website and emailed to interested parties. The notice will include a summary of the proposed changes and information on how to request a copy of the entire proposed amendment. Any comments received in writing will be considered in preparing the substantial amendment. The final substantial amendment will be submitted with a summary of these comments or views and the reasons for not accepting any comments received.

ACCESSIBILITY FOR PEOPLE WITH LIMITED ENGLISH PROFICIENCY AND PEOPLE WITH DISABILITIES: All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, Orange County will provide interpreters at public hearings and meetings. Furthermore, meeting notices will be sent to organizations representing non-English speaking residents of the County. The information will be made available in a form accessible to people with disabilities upon request (see **“Contact Information”** section).

AVAILABILITY TO THE PUBLIC: Digital copies of Orange County’s most recent approved and adopted Consolidated Plan, Annual Action Plan, AFH, and CAPER are available to the public on the Orange County

Department of Housing and Community Development's website. Hard copies, in reasonable numbers, will also be provided to citizens or groups upon request.

ACCESS TO RECORDS: Orange County will provide residents of the community, public agencies, and other interested parties with reasonable and timely access to information and records regarding the Orange County Consolidated Plan, Annual Action Plan, AFH, CAPER, and use of Federal funds during the most recent five-year period.

TECHNICAL ASSISTANCE: Orange County will provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in (1) commenting on the Consolidated Plan, Annual Action Plan, AFH, or CAPER or (2) in developing proposals for funding assistance under any of the Federal programs covered by the Consolidated Plan, with the level and type of assistance determined by the County.

COMPLAINTS: At any time, residents may submit complaints related to the Consolidated Plan and any amendments, Annual Action Plan, AFH, or CAPER by telephone, mail, or email (see "**Contact Information**" section). The County will provide a written response to every written complaint that relates to the Consolidated Plan and any amendments, Annual Action Plan, AFH, or CAPER within 15 working days.

WAIVERS TO CITIZEN PARTICIPATION CONSOLIDATED PLAN REQUIREMENTS DUE TO COVID-19: In accordance with 24 CFR 5.110, HUD may, upon a determination of good cause and subject to statutory limitations, waive regulatory provisions. Additional regulatory waiver authority is provided in 24 CFR 91.600. In December 2019, a new coronavirus known as COVID-19 was first detected in Wuhan, People's Republic of China, causing outbreaks of the coronavirus disease that has now spread globally. In March 2020, the World Health Organization declared the coronavirus outbreak a pandemic and President Trump declared the outbreak a national emergency. The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) makes available \$5 billion in supplemental CDBG funding for grants to prevent, prepare for, and respond to coronavirus (CDBG-CV grants). A memorandum dated April 9, 2020, from John Gibbs, Acting Assistant Secretary for HUD's Office of Community Planning and Development (CPD), provides that grantees may amend citizen participation plans to incorporate certain waivers that establish expedited procedures to draft, propose, or amend consolidated plans and annual action plans with respect to CDBG-CV grants and FY 2019 and 2020 grants. Specifically, the waivers authorize an accelerated **public notice and comment period of five days**; further, the five-day period for comments on Consolidated Plans and amended citizen participation plans may run concurrently. The following waivers to Consolidated Plan and Action Plan requirements for CDBG-CV grants and FY 2019 and 2020 grants have been authorized by HUD to expedite CDBG response to the coronavirus pandemic:

1. **Citizen Participation Public Comment Period:** Given the need to expedite actions to respond to COVID-19, HUD has waived 24 CFR 91.115(c)(2) and (i) in order to balance the need to respond quickly to the growing spread of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on new Consolidated Plans, Annual Action Plans, and/or substantial amendments. The standard 30-day minimum notice and comment period is waived, provided that no less than five days are allowed for public comments on each Consolidated Plan, Annual Action Plan, or substantial amendment. This waiver is available through the end of calendar year 2020.
2. **Citizen Participation Reasonable Notice and Opportunity to Comment:** In recognition that efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen

participation, HUD further waives 24 CFR 91.115(c)(2) and (i) to allow grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances. This authority is in effect through the end of the State's 2020 program year. Aside from the expedited five-day public comment period, procedures for substantial amendments will also be modified. Citizens will be provided with notice and an opportunity to comment on proposed substantial amendments by way of email distribution lists and posting on the Orange County website and social media. A summary of each proposed substantial amendment will be included in the public notice. The County will identify a deadline for the submittal of written comments on the proposed substantial amendment; that timeframe will allow no less than five calendar days. Written comments may be submitted via email (see **"Contact Information"** section). A summary of all comments received will be attached to the substantial amendment to the Consolidated Plan.

- 3. Performance Reports:** The County will publish its annual performance report for public comment and will conduct at least one hearing on the proposed report. The hearing or meetings will be publicized and held as described in the **"Meetings and Public Hearings"** section. The published notice will include a summary of the report, along with a list of places where the entire proposed plan may be examined. The summary will also be sent to local advocacy groups, nonprofit housing organizations, housing-related service providers, for-profit developers, professional organizations, other known constituency groups, and citizens who have requested notification. The entire report will be available for inspection online on the Orange County Department of Housing and Community Development's website, or in hard copy upon request. Orange County will receive comments from residents on the proposed consolidated plan for a period of not less than 15 days. The comment period will be publicized in the notices published in the newspaper and mailed to interested parties. Any comments received in writing or orally at the public hearings will be considered in preparing the final report. The final report will include a summary of these comments or views.

EFFECTIVE DATE: This plan was adopted on September 15, 2020 and supersedes all previous Citizen Participation Plans. The Board of Commissioners must approve all future amendments to this plan.