

OAKLAND COUNTY, MICHIGAN COMMUNITY & HOME IMPROVEMENT DIVISION CITIZEN PARTICIPATION PLAN FOR

U.S. Department of Housing & Urban Development Entitlement Grants administered by Oakland County including but not limited to the Community Development Block Grant (CDBG, CDBG-DR, CDBG-CV) Programs, Home Investment Partnerships (HOME) Program/Oakland County HOME Consortium and Emergency Solutions Grant (ESG, ESG-CV) Programs

INTRODUCTION - Oakland County is eligible to apply for federal housing and community development grants available through the U.S. Department of Housing and Urban Development (HUD) as an “Urban County” entitlement jurisdiction and “Lead Entity” for the Oakland County HOME Consortium. Housing and community development grants include Community Development Block Grant (CDBG/CDBG-DR/CDBG-CV), Home Investment Partnerships (HOME) Program and the Emergency Solutions Grant (ESG/ESG-CV).

Citizen Participation during times of emergency - In event of a local, state, and national natural disaster or declaration of an emergency, existing and new funding may be allocated or re-allocated in an expedited time frame. To streamline the allocation process and reduce delays in accessing grant funds, Oakland County will follow U.S. Department of Housing and Urban Development (HUD) notices, waivers, award letters or other HUD communication. Citizen participation requirements will be applied per HUD notices, waivers, award letters or other HUD communication to the Consolidated Plan and/or substantially amended Action Plan(s) and other processes as deemed approved by HUD.

HUD announced availability of a “Mega Waiver,” which provides flexibility for certain regulatory requirements associated with several Community Planning and Development (CPD) grant programs to prevent the spread of COVID-19 and facilitate assistance to eligible communities and households economically impacted by COVID-19. On May 22, 2020, Oakland County requested use of the Mega Waiver and notified HUD of their intention to exercise certain waivers as described below.

Meetings related to the CARES Act may be facilitated by the most feasible means at the time (ex: virtual or call-in meetings in lieu of public gatherings). Meetings must still accommodate and provide information to those with vision and hearing impairments to the best extent feasible. At a minimum, the meeting must still comply with the Open Public Meetings Act.

Applicability and adoption of the Citizen Participation Plan (CPP) - HUD requires grantees to maximize citizen participation in the planning, application, performance and reporting processes associated with each grant through a formally adopted plan that sets forth policies and procedures for citizen participation. This (CPP) was written and adopted in conformance with the requirements of 24 CFR Part 91.105 et seq, which govern the preparation of the Five Year Consolidated Plan, Assessment of Fair Housing (AFH), Annual Action Plan, and Consolidated Annual Performance and Evaluation Report for both the County of Oakland as an Urban County and the Oakland County HOME Consortium lead entity.

Purpose of the Citizen Participation Plan (CPP) - The Citizen Participation Plan (CPP) describes the policies and procedures for involving residents in critical planning issues related to the County's Community Development Block Grant (CDBG/CDBG-DR/CDBG-CV) and Emergency Solutions Grant (ESG/ESG-CV) programs and the Home Investment Partnership Program (HOME) for the Oakland County HOME Consortium. As a CDBG Urban County, Oakland County's CDBG Program serves 53 local units of government ("Subrecipients"), including the Cities of Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Pontiac, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake and Wixom; Townships of Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield and White Lake; Villages of Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake.

Oakland County, as the CDBG Urban County also serves as the Lead Entity for the Oakland County HOME Consortium and administers HOME funds on behalf of the Consortium members. Oakland County HOME Consortium members include the Oakland County CDBG Urban County partner communities and the independent CDBG entitlement communities of the Cities of Southfield, Farmington Hills, Royal Oak and the Township of Waterford.

This CPP provides for HOME related citizen participation within all Oakland County HOME Consortium communities such that HOME Consortium members can certify to HUD that it is following the Oakland County CPP as a Consortium member. However, Consortium members that are also CDBG entitlement communities receiving CDBG/CDBG-DR/CDB-CV funds directly from HUD and operating independently of the Oakland County CDBG/CDBG-DR/CDBG-CV program are required to have a local CDBG citizen participation plan.

Oakland County's CPP provides a guide for public consultation, input and participation and encourages citizen participation in identifying housing, community development, Fair Housing and public service needs; funding priorities; target populations to be served through available resources; and how to address any amendments to the Five Year Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, Consolidated Annual Performance Report, Citizen Participation Plan as required by HUD.

Objectives of the Citizen Participation Plan

The CPP includes the following objectives and describes how each will be met to ensure federal regulatory compliance.

- Encourage citizen participation by providing residents with adequate information concerning:
 - the goals and objectives of the grant programs
 - housing, community development, public service and Fair Housing needs
 - the amount of funds expected to be available for housing, community development, Fair Housing and public service activities through federal and local funding sources including program income
 - the proposed range of activities that may be undertaken with such funds
 - the amount that will benefit low income persons
 - plans to minimize displacement and assist any residents displaced as a result of an eligible activity
 - other important program requirements
 - proposed and approved use of funds for eligible activities
- Provide for and encourage citizen participation from all sectors of the community, with particular emphasis on participation by low income residents and minority and non-English speaking residents, as well as persons with physical or mental impairments and homeless or formerly homeless residents.

- Provide residents with reasonable and timely access to information and records for review and comment relating to specific grant plans and reports including:
 - Housing and Community Development Needs
 - Citizen Participation Plans
 - Five Year Consolidated Plans
 - Annual Action Plans
 - Consolidated Annual Performance and Evaluation Reports (CAPER)
 - Substantial Amendments to the plans or reports
 - Affirmatively Furthering Fair Housing
- Provide technical assistance to groups representing low income persons and to interested residents that request such assistance in developing proposals for funding assistance under federal funding sources covered by the Five Year Consolidated Plan and Assessment of Fair Housing with the level and type of assistance to be determined by the County.
- Conduct public hearings to obtain the views of residents on housing, community development, Fair Housing and public service needs, proposed activities, and program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential and actual beneficiaries, with accommodation for persons with disabilities and non-English speaking residents.
- Provide opportunities for consultation with residents and gather community input, through a variety of methods such as, community meetings, focus groups, surveys, social media, websites and other appropriate forums regarding funding priorities.
- Consult with local and regional institutions, Continuums of Care, Public Housing Authorities, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations and Fair Housing Organizations in the process of developing and implementing Affirmatively Furthering Fair Housing.
- Prepare a summary of comments or views received from residents in writing or orally through public hearings, focus groups, community meetings, consultations, online and other methods when preparing the final Five Year Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, CAPER and any amendments to the Consolidated Plan, Annual Action Plan, Assessment of Fair Housing, or the performance report and attach the summary to the final Plan or report. In addition, provide for a timely written answer to written complaints and grievances within 15 working days, where practicable.
- Provide criteria for determining what constitutes a substantial change in the planned or actual activities described in the approved Five-Year Consolidated Plan, Annual Action Plan or CAPER which would require an amendment.

OAKLAND COUNTY CDBG SUBRECIPIENT CITIZEN PARTICIPATION REQUIREMENTS

Local Subrecipient Public Hearings - Communities participating in the County's CDBG program as subrecipients must provide local residents information on CDBG programs and an opportunity to comment on proposed activities as part of the annual CDBG application process. Each community must conduct a minimum of one public hearing with reasonable advanced notice and accessibility.

Adequate Notice of the Public Hearing - Each community must notify residents and interested groups of the date and time of the public hearing at which housing and community development program activities will be addressed. At a minimum, notification must be placed in a newspaper of largest general circulation. The notice should be published 10 days before the date of the hearing to give residents an opportunity to attend. A community may also post the notice at public buildings in the area and online. Community level public hearings must be held in a location which is convenient to potential and actual beneficiaries, and which is accessible to persons with disabilities. At public hearings where a significant number of non-English speaking residents are expected to participate, the community should address their needs by providing an interpreter.

Public Access to Information - The participating CDBG communities will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records. Information will be available in a format accessible to persons with disabilities as requested.

Public Hearing Documentation and Application Approval Documentation - When submitting documentation of the CDBG annual application public hearing, each community must provide Oakland County with:

- **A true copy of the meeting minutes clearly showing an opening and closing of the public hearing, the planned use of CDBG funds, and the approval of the application.** (A *true copy* is a copy of the minutes with a statement, signed by the official clerk, that the minutes are a true and accurate record of the proceedings.) Additional information can be added to meet specific local needs and to encourage participation.

OR

- **A governing body resolution clearly showing an opening and closing of the public hearing, the planned use of CDBG funds, and the approval of the application.** Additional information can be added to meet specific local needs and to encourage participation.

COUNTY LEVEL CITIZEN PARTICIPATION REQUIREMENTS

Citizens Advisory Council (CAC) - The County maximizes citizen participation through its Citizens Advisory Council. The Housing and Community Development Act of 1974 requires that participating communities in addition to residents at large provide input on community development needs. Oakland County's Board of Commissioner's Resolution #7835 established a Citizens Advisory Council to provide a mechanism for residents representing broad socio-economic and geographic areas to advise the County on the planning, implementation, and assessment of the programs. The CAC consists of 20 members appointed by the Board of Commissioners who represent participating communities, County Commissioners, the general public, and Oakland County's low income population. The CAC serves in an advisory capacity to staff and the Board of Commissioners in developing and accessing federal grant program policies. Despite selection from various geographic regions all members represent the County.

County Level Public Hearings - Oakland County will conduct one public hearing to provide residents information on all CDBG programs and an opportunity to comment on the proposed use of all CDBG, HOME Consortium and ESG funds as part of the annual consolidated grant application (Annual Action Plan) process and a second to provide residents an opportunity to comment on the Consolidated Annual Performance and Evaluation Report (CAPER).

Adequate Notice of the Public Hearing - A Public Notice of opportunity to comment will, at a minimum, be published in a newspaper of general circulation and posted on the Oakland County website. Topics that include a public hearing will be published at least 10 days prior to the public hearing. The notice will include sufficient information about the purpose of the public hearing to permit informed comment from residents. An effort will be made to also publish notices in publications serving minority communities and non-English speaking residents, dependent on availability and publication deadlines. Notices will include information on assistance requests for accessibility for persons with physical disabilities or language barriers.

Public Hearing Accessibility - County level public hearings will be held in the Oakland County Executive Office Building, Conference Center, 2100 Pontiac Lake Rd, Waterford, MI 48328, or in other locations which are convenient to potential and actual beneficiaries, and which are accessible to persons with disabilities. Accessibility assistance will also be made available with prior notice for sensory limitations or language barriers such as sign language interpreters or language translators.

Public Comment Period - A minimum public comment period ranging from 15 days to 30 days will be provided depending on the topic. Public comment opportunity will be provided sufficiently in advance of proposed actions so that comments may be incorporated. All written comments received, or oral comments made at public hearings will be considered. A summary of such comments will be attached to the relevant plan or report.

CITIZEN PARTICIPATION OPPORTUNITIES - A QUICK GUIDE

Oakland County will follow the procedures outlined below to assure opportunities for public comment on housing and community development grant plans, applications and reports as required by HUD.

Assessment of Fair Housing (AFH) and (Procedures for Public Comment on (AFH) Development)	
Comment Period:	30 days
Public Hearing:	Yes
Scheduled:	As Needed
AFH requirements will be updated and revised as needed. Changes in the procedures for public comment are subject to a 30-day public comment period. A public notice will be published in a newspaper of general circulation and a draft will be available for public review in the Community & Home Improvement Division during regular business hours throughout the comment period and at www.advantageoakland.com . Minimally.	

Citizen Participation Plan (CPP) (Procedures for Public Comment on Housing & Community Development Plans & Programs)	
Comment Period:	From 15 Days to 5 Days
Public Hearing:	Yes
Scheduled:	As Needed
ORIGINAL: The CPP will be updated and revised as needed. Changes in the procedures for public comment are subject to a 15-day public comment period. A public notice will be published in a newspaper of general circulation and a draft of the CPP will be available for public review in the Community & Home Improvement Division during regular business hours throughout the comment period and at www.advantageoakland.com Revised Citizen Participation Reasonable Notice and Opportunity to Comment - Oakland County's Citizen Participation Plan updated to allow the 15-day notice requirement for hearings to be waived when Consolidated Plan/Annual Action Plan activities are in response to an urgent need like COVID-19. When using the waiver, the County will provide reasonable notice and may use virtual/social media rather than display advertisements.	

Five-Year Consolidated Plan (Housing and Community Development Plan)	
Comment Period:	30 Days
Public Hearing:	Yes
Scheduled:	April
Every five years, the U.S. Department of Housing and Urban Development (HUD) requires the County to re-evaluate its policies and strategies for addressing housing and community development needs. The Consolidated Plan (Con Plan) includes information on population and housing conditions, as well as strategies for achieving outcomes. In addition, the Continuum of Care contributes information on homelessness and strategies to end homelessness. Following the completion of the draft Con Plan, a public notice will be published in a newspaper of general circulation and on the County website. The notice will include an outline of the Con Plan, the date, time and location of the public hearing, and the deadline for receipt of written comments. Citizens may provide verbal comments at the public hearings and/or written comments during the comment period. A draft of the Con Plan will be available for public review in the Community & Home Improvement Division during regular business hours and throughout the comment period at www.advantageoakland.com	

Subrecipient Annual CDBG Housing & Community Development Needs Assessment	
Comment Period:	Ongoing
Public Hearing:	Yes
Scheduled:	October – December
Each community shall hold at least one public hearing before submitting its CDBG annual application to Oakland County to assess housing and community development needs and propose activities to be funded. The hearing shall be at a convenient time and location in order to provide for broad citizen participation, particularly by low income residents who may be potential or actual beneficiaries of a CDBG project.	

County Level Review of Proposed Annual Funding and Activities for CDBG, HOME Consortium and ESG	
Comment Period:	15 Days
Public Hearing:	Yes
Scheduled:	March - May
The Oakland County Community & Home Improvement Division and Citizens Advisory Council will host at least two public hearings to obtain residents' views on housing and community development needs and specific activities proposed by the County and participating communities for each program year. Provisions are made for non-English speaking persons when a significant number of them can reasonably be expected to attend the County level public hearings. Local subrecipients are expected to make similar provisions for local public hearings.	

Oakland County Annual Action Plan Funding and Activity Recommendations	
Comment Period:	30 Days
Public Hearing:	Yes
Scheduled:	April
<p>Before the Annual Action Plan can be submitted to the HUD, the Community & Home Improvement Division obtains formal approval for proposed activities from the Oakland County Board of Commissioners. This includes those projects undertaken by participating communities as well as those administered by the Division. A draft of the Annual Action Plan, which includes these recommendations, is available for public review in the Community & Home Improvement Division during regular business hours throughout the comment period and at www.advantageoakland.com</p> <p>The Community & Home Improvement Division publishes an Annual Report each year. The report includes the Final Statement of housing and community development objectives. The Annual Report contains information on the County's performance from the previous year and the projected use of funds (also known as the Annual Action Plan) for the upcoming program year for the County and the participating communities. The Report serves as part of the required environmental review record and is distributed throughout Oakland County. Participating communities, senior centers, libraries, public service agencies, and other stakeholders receive the Annual Report. The Final Statement encourages citizen participation by posting for an 18 day comment period and subsequent 15 day comment period to HUD to insure maximum citizen input before HUD review and release of funds.</p>	

Substantial Plan Amendments	
Comment Period:	From 30 Days to 5 days
Public Hearing:	Yes
Scheduled:	As Needed
<p>ORIGINAL: The County is required to advise HUD of substantial changes in its Five-Year Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report and/or Citizen Participation Plan. Criteria for amending the Plans and/or the disbursement or targeting of funding would include changes in activities or the method of distribution, either reported herein or unforeseen, and changes in beneficiaries or subscribers that could reasonably be expected to change the delivery of services described herein. By definition, a substantial amendment to the Consolidated Plan would result from a change from eligible to ineligible activity, or vice versa, or a change from competitive award of funds to formula allocation, or vice versa, or from a change in the method of distribution of funds if said change will cause an increase or decrease in the original allocation mix over 15%. Administrative transfers of funds to reflect actual program spending between and among programs identified in the plans will not constitute a substantial amendment to the plans if 1) such transfer does not result in the addition or elimination of the activities described herein and 2) such transfer does not cause a change in program priorities as described. The following changes will not be considered as substantial amendments: 1) changes between new construction and substantial rehabilitation, and 2) changes arising from urgent community needs due to emergency or disaster situations. Non-substantial amendments do not require a public comment period.</p> <p>The County will provide residents and participating communities with reasonable notice and an opportunity to comment on substantial amendments. Reasonable notice will be given through a public notice in a newspaper of general circulation. Opportunity to offer comments will be provided by a period of not less than 30 days, identified in the public notice, to receive comments on the substantial amendments before the amendment is implemented. The notice will clearly provide the name and address of the person responsible for receiving these comments. The County will consider any comments or views of residents and participating communities received in writing, if any, in preparing the substantial amendment to the plans or reports. A summary of these comments or views not accepted and the reasons therefore shall be attached to any substantial amendment to the plans or reports.</p> <p>Revised Citizen Participation Public Comment Period - Oakland County's Citizen Participation Plan updated to allow the 30-day public comment period requirement for Consolidated Plan/Annual Action Plan Amendment document review to be waived when Consolidated Plan activities are in response to an urgent need like COVID-19. When using the waiver, the County will provide a 5-day public comment period.</p>	

Consolidated Annual Performance and Evaluation Report (CAPER) (Reporting on Funded Activities)	
Comment Period:	15 Days
Public Hearing:	Yes
Scheduled:	September
<p>The Community & Home Improvement Division prepares an annual report on the performance of funded activities. Residents may provide verbal comments at the public hearing and/or written comments during the comment period. A draft of the CAPER is available for public review in the Community & Home Improvement Division during regular business hours throughout the comment period and at www.advantageoakland.com</p>	

ADDITIONAL PROVISIONS

Availability to the public - The Citizen Participation Plan, Consolidated Plan, Annual Action Plan, Assessment of Fair Housing and Consolidated Annual Performance and Evaluation Report (CAPER), shall be available to residents, including the availability of materials in a form accessible to persons with disabilities, upon request. Oakland County furnishes information to residents and/or local governments through public hearings, direct mailings, various agency directories, newspaper advertisements, emerging technologies, and through the Citizens Advisory Council.

Access to records - The County shall provide residents, public agencies, and other interested parties with reasonable and timely access to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, the Assessment of Fair Housing and the County's use of assistance under covered programs.

Technical assistance - The County will provide technical assistance to groups representing low income persons, as well as to community-based organizations and interested residents that request such assistance in developing proposals for funding under any of federal or local funding sources covered by the Annual Action Plan and/or Consolidated Plan, with the level and type of assistance to be determined by the County. Anyone requiring assistance should contact the Community & Home Improvement Division at 248-858-0493.

Response to Citizen Comments - Residents, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER and the Assessment of Fair Housing. The County of Oakland and, when appropriate, the HOME Consortium member communities, will consider written, electronic and oral comments received in preparing or the final Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, and Assessment of Fair Housing for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

The County shall provide a timely, substantive written response to every written resident's comment, within 15 working days, where practicable, to complaints received from residents on the Consolidated Plan, amendments and performance report. Send written comments to: Karry L. Rieth, Manager, Oakland County Community & Home Improvement Division, Oakland Pointe, Suite 1900, 250 Elizabeth Lake Rd, Pontiac, MI 48341-0414 or email riethk@oakgov.com

Anti-Displacement Policy - The County is committed to minimizing the involuntary and permanent displacement of residents as a result of federally assisted projects. The County's CDBG, HOME Consortium and ESG Programs are operated under a Residential Anti-Displacement and Relocation Assistance Plan as required by the U.S. Department of Housing and Urban Development. A copy of this plan is available upon request. While no displacement is expected as a result of proposed Community Development activities, the County is prepared to similarly assist any resident found to be so displaced. Relocation benefits, including payment for replacement housing and reasonable moving expenses, would be offered to residents who are displaced. Benefits and procedures for displacement would be carried out in conformance with the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1987, as amended.

More Information - For more information, contact Oakland County Community & Home Improvement Division, Oakland Pointe Suite 1900, 250 Elizabeth Lake Road, Pontiac, MI, 48341 or call 248-858-0493.