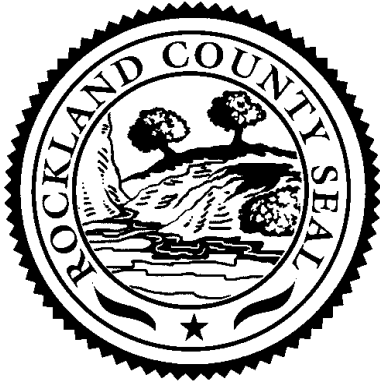


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AMENDED CITIZEN PARTICIPATION PLAN

For the U.S. Department of
Housing and Urban
Development

Five-Year Consolidated Plan
and Annual Action Plan

2015-2019

Ed Day, County Executive

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Rockland County, New York

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I. INTRODUCTION AND BACKGROUND

The Rockland County Office of Community Development (County) serves the people of Rockland County by obtaining federal and State grants to provide affordable housing and improve the quality of life for low and moderate income residents in Rockland in an ethical, courteous, timely and cost-effective manner. The Office of Community Development is the overall administrative agent for the Federal Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs for the County. These programs, which are all funded through the U.S. Department of Housing & Urban Development (HUD), are intended to support the goals of providing decent housing, providing a suitable living environment and expanding economic opportunities for low and moderate income people.

Starting in 1995, HUD requests grantees such as Rockland County to consolidate the submission requirements for all of the above formula grant programs in order to promote coordinated neighborhood and community development strategies to revitalize communities. The requirements of the Consolidated Plan submission, which includes the First Year Annual Action Plan¹ and Amended Citizen Participation Plan (if needed), also create the opportunity for citizen participation to occur in a comprehensive manner. As required by 24 CFR Part 91, in the development of its Consolidated Plan and Annual Action Plan, the Rockland County Office of Community Development will follow a detailed Citizen Participation Plan.

This Citizen Participation Plan (CPP) has been prepared to explain the Office of Community Development's role with the public in the preparation of the Five Year Consolidated Plan, Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPER). Citizens shall be given a fourteen (14) day comment period to review the proposed Citizen Participation Plan and any significant amendments to the Citizen Participation Plan. The County of Rockland will make the Citizen Participation Plan public in a format accessible to persons with disabilities.

Notification of the availability of the Citizen Participation Plan shall be posted on the Rockland County website. Upon completion of the fourteen (14) day citizen comment period, the proposed Citizen Participation Plan and a summary of comments shall then be forwarded to the County Executive for adoption.

II. CONSOLIDATED PLAN DEVELOPMENT

The Rockland County Office of Community Development serves as the lead agency for the development of the Consolidated Plan and Annual Action Plan and administers a variety of Federal, State and locally funded programs designed to improve the physical, social and economic life of Rockland County. In addition to the entitlement programs listed above, the County is the lead agency for the Rockland County Continuum of Care Program and administers Economic Development Loan and Section 8 Housing Choice Voucher programs. The activities outlined in the Strategic Plan component of the Consolidated Plan will be coordinated by the County and carried out by its staff as well

¹ The Annual Action Plan will be referred to as such in this document, except when submitted with the Five Year Consolidated Plan, where it will be referred to as the First Year Annual Action Plan.

as by other public agencies, nonprofit providers and private businesses. Rockland County has a well-developed nonprofit service sector consisting of agencies ranging from small neighborhood-focused community based organizations to large countywide organizations. These service providers offer a full range of housing and social services. The County has a long history of working with these agencies and with private and not-for-profit housing developers and other businesses through its housing and community development programs.

The Rockland County Office of Community Development is an active participant enhancing coordination among public and assisted housing providers, private and governmental agencies. County staff will gather information for the preparation of the Consolidated Plan and Annual Action Plan. The County convenes regular meetings with HUD-funded service providers to oversee strategy implementation and to ensure coordination of effort. The Office of Community Development is also the lead agency in the Rockland Continuum of Care Partnership for the Homeless, which coordinates a county-wide continuum of services for the homeless, including special needs populations.

The County will make a concerted effort to notify citizens, agencies and organizations of the development of the Consolidated Plan and Action Plan and the availability of CDBG funds through mailings, postings and public notices in the newspaper. Before the County adopts the Consolidated Plan and First Year Annual Action Plan, the County will make available to citizens, public agencies and other interested parties information that includes 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.

III. CITIZEN PARTICIPATION PLAN OBJECTIVES

The County of Rockland encourages citizens to participate in the development of the Consolidated Plan with particular emphasis on participation by residents of public and assisted housing and in areas where Community Development Block Grants (CDBG), HOME Investment Partnership Program, Emergency Shelter Grant (ESG), and Housing Opportunities for Persons With Aids (HOPWA) funds are proposed to be used, as well as minority and non-English speaking persons, and those with mobility, visual or hearing impairments.

The Citizen Participation Plan also incorporates the following provisions:

- Provides citizens with reasonable and timely access to local meetings, information and records relating to the amount of funds available to Rockland County and the County's proposed use of funds;
- Provides materials in a form accessible to persons with disabilities, upon request;
- Provides for technical assistance to groups representing persons of low and moderate income that request assistance in developing proposals with the level and type of assistance to be determined by Rockland County's Office of Community Development;

- Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including the assessment of needs, the review of proposed activities, and review of program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- Provides for a timely written response to written comments, complaints and grievances, within 20 working days where practicable; and
- Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

IV. THE CONSOLIDATED PLANNING PROCESS

Overview of Public Input

The Consolidated Plan is developed through a collaborative process to establish a long term vision for Rockland County's community development goals and objectives. Participation by citizens, community agencies and other interested stakeholders is a vital component of the process. Individual consultations, public meeting and hearings, public surveys and written comments inform the priority needs of the County. The County makes it a priority to reach out to citizens residing in CDBG-funded or targeted areas for their ongoing input into the Consolidated Plan. Additionally, the Office encourages the participation of all residents, including minorities, the non-English speaking population and persons with disabilities.

Five Year Consolidated Plan and First Year Annual Action Plan

This section outlines the steps for public participation in the Five Year Consolidated Plan and First Year Annual Action Plan.

Consultations and Surveys

The Office of Community Development will consult with the consortium member communities regarding consideration of public housing needs and planned comprehensive grant program activities. The consultations will include representatives from related County departments, the business community, social service agencies and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless and chronically homeless persons. The Office Of Community Development will help ensure that activities with regard to local drug elimination, neighborhood improvement programs and resident programs and services those funded under a program covered by the consolidated strategy and plan are fully coordinated to achieve comprehensive community development goals. Two consultation meetings will be undertaken with the community stakeholders identified above. Individual meetings with stakeholders may also be undertaken on the day of these stakeholder meetings. The consultation meetings will be advertised to stakeholders as outlined in the "Notifications" section of this document.

A web-based survey will be undertaken to inform the Housing and Community Development Needs Assessment, measuring the extent of respondents' experience with housing problems and other community housing issues. The survey will be provided in both Spanish and English and will be made available to the public for at least 30 days. Hard copies of the surveys will be distributed to select locations to reach populations with low rates of computer and internet access. County residents will be notified the day the survey is issued as outlined in the "Delivery" subsection of the "Notifications" section of this document.

Public Hearings

To encourage citizen participation, the Rockland County Office of Community Development will hold at least two public hearings to provide a mechanism for public input into the needs assessment, priorities, and other sections of the Plan. The purpose of the hearings will be to obtain views of citizens, public agencies and other interested parties, and respond to proposals and comments at all stages of the consolidated submission process. This includes identifying housing and community development needs, reviewing the proposed use of funds, and reviewing program performance.

The first hearing will be held to gather information on community needs from citizens to inform the draft Consolidated Plan. The second hearing will be held a minimum of ten (10) days after the draft Consolidated Plan is published to receive oral comments on the draft Consolidated Plan and First Year Annual Action Plan. Any comments received through public hearings or the comment period will be recorded and addressed in the Consolidated Plan. An announcement detailing proposed funding allocations and the availability of the proposed Consolidated Plan and/or First Year Action Plan and soliciting public comments will be published in the *Rockland Journal News* and *The Rockland County Times* prior to the second public hearing. The public hearings are advertised to citizens as outlined in the "Notification" section of this document.

Public Comment Period

Prior to the adoption of the Consolidated Plan and First Year Annual Action Plan for submission to the U.S. Department of Housing and Urban Development, the County shall make available to citizens, public agencies, and other interested parties the Proposed Consolidated Plan and First Year Annual Action Plan. Full copies of the Proposed Consolidated Plan and First Year Annual Action Plan shall be available on the County's website and at the following location, as well as a copy sent to each Consortium Member Community:

**Rockland County Office of Community Development
50 Sanatorium Rd, Bldg K
Pomona, NY 10970**

The County will publish a summary in the *Rockland Journal News* and *The Rockland County Times* and on the County website describing the contents and purpose of the Consolidated Plan/First Year Action Plan and listing the locations where the entire document may be examined.

Citizens shall have at least 30 days to comment on the Proposed Consolidated Plan and First Year Action Plan; comments shall be submitted to the Rockland County Office of Community Development. A summary of comments and responses will be attached to the final Consolidated Plan/Action Plan document.

Continuity of participation is assured throughout all stages of the program by the dissemination of information to participating entities. Toward this end, the Citizen Participation Coordinator will have outreach materials available to all parties at the Office of Community Development.

Annual Action Plan

The Annual Action Plan outlines the funding allocations that will be used to achieve the objectives outlined in the Consolidated Plan. During the last three program years, the County will hold at least one public hearing on the Annual Action Plan during its development, which follows the publication requirements outlined in the “Notifications” section of this document. The Action Plan is also published for at least fourteen (14) days for written public comment. Public hearings held during a Consolidated Planning year will address both the Consolidated Plan and Annual Action Plan and will follow the requirements outlined for the Consolidated Plan.

Each Consortium Member Community shall be responsible for public hearings and group meetings, a public information program, and responding to citizen proposals for their respective communities. Each year in September the County will advise the Consortium Member Communities that it is time for their Citizen Advisory Committee to meet and discuss the needs in the municipality and recommendations for use of CDBG funds. The County requires that meeting minutes be submitted as part of the Consortium Member Community’s Formal Application for funding that is usually due by the end of the following January.

The County further contacts the Consortium Member Community in December to request when the January meeting date is for their Town and/or Village. Once this is verified, the Office of Community Development publishes a Public Hearing Notice in the *Rockland Journal News* and *The Rockland County Times*. This public hearing is for discussion on past community development projects and the application for funding for new projects, allowing the general public to make their comments and opinions known. The minutes of this meeting is also required to be submitted with the application.

Consolidated Annual Performance and Evaluation Report (CAPER)

The primary purpose of the Consolidated Annual Performance and Evaluation Report (CAPER) is to report on the accomplishments of the funded activities within the program year and evaluate the grantee’s progress in meeting the one-year goals described in the Annual Action Plan and the long-term goals described in the Consolidated Plan. The CAPER is submitted to HUD annually. The County will hold one public hearing on the CAPER near the time of its submission and will notify the public according to the “Notifications” section of this document. The draft CAPER will be made available on the website and will be published for at least fourteen (14) days to receive comments on the performance report before it is submitted to HUD. The final CAPER report will consider any comments received in writing or orally at public hearings and will include a summary of all of these comments.

V. AMENDMENTS

Citizen Participation Plan (CPP)

Citizens shall be given a fourteen (14) day comment period to review any significant amendments proposed to the Citizen Participation Plan. The County of Rockland will make the Citizen Participation Plan public in a format accessible to persons with disabilities, upon request. Notification of the availability of the Citizen Participation Plan shall be published on the County website and other forms of media deemed appropriate. Upon completion of the fourteen (14) day citizen comment period, the proposed Citizen Participation Plan and a summary of comments shall then be forwarded to the County Executive for adoption.

Consolidated Plan and Annual Action Plan

In accordance with 24 CFR 91.105, the County is required to amend its approved Consolidated Plan or Annual Action Plan whenever it performs one of the following actions:

1. To make a substantial change in its allocation priorities or a substantial change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income), not previously described in the action plan; or
3. To substantially change the purpose, scope, location or beneficiaries of an activity.

Rockland County is required by HUD (24 CFR 91.105(b)) to identify the criteria to be used in determining if a proposed action will be considered a "Substantial Amendment." The County defines a Substantial Amendment as any change in the allocation or distribution of funds, activity, or recipient where the dollar amount of that change is equal to or greater than 25 percent of the current fiscal year Federal allocation, which includes additions or reductions. This includes:

1. The addition of a new activity or project not previously described in the Consolidated Plan or Annual Action Plan;
2. The deletion of an activity or project previously described in the Consolidated Plan or Annual Action Plan;
3. Change in the purpose, scope, location or beneficiaries of an activity or project previously described in the Consolidated Plan or Annual Action Plan;
4. Change in the use of CDBG funds from one eligible activity or project to another previously described in its Consolidated Plan or Annual Action Plan;
5. Change in an activity or project previously described in its Consolidated Plan or Annual Action Plan.

Reasonable opportunity to comment on substantial amendments to the Consolidated Plan or Annual Action Plan will be provided. Notices will be published in the *Rockland Journal News* and *The Rockland County Times* providing for a 30 day comment period. Upon close of the comment period, the final revised Consolidated Plan or Annual Action Plan will be approved by the County Executive before being submitted to HUD. The amended Consolidated Plan or Annual Action Plan will be posted on the County website.

VI. GENERAL REQUIREMENTS

Public Hearings

At least two (2) public hearings per year shall be conducted during two different stages of the program year to obtain feedback and input from Rockland County residents, public agencies and other interested parties on the housing and community development needs of the County. One of the minimum of two (2) public hearings will be held in conjunction with the preparation of the Annual Action Plan, with the other public hearing directly tied to the public input component of the CAPER submission.

Public hearings shall be held annually in each Consortium Member Community prior to submission of their Formal Application for funding. In addition to the public hearings, the County shall continue to meet with particularly affected groups to discuss and plan specific projects.

Notice of the public hearings shall be advertised as outlined in the “Notifications” section below, may also (as is specifically addressed in the sections outlining the process for each HUD submission) provide the public with a description of the HUD Consolidated Planning process, a list of the types of eligible and ineligible CDBG, HOPWA and HOME activities, the amount of funds available to the County, the County’s past accomplishments and the proposed programs/projects. Special care shall be taken to ensure those low and moderate-income populations and areas where there is concentrated community development activity are represented at the public hearing.

Notifications

In accordance with the Federal regulations, the County shall publish official notices of its public hearings in two area newspapers: *The Rockland Journal News* and *The Rockland Times*. Meeting announcements will also be posted on the County’s website. Announcements of the public hearings shall also be sent to each Consortium Member Community and local not-for-profit agencies. Public service agencies and other local neighborhood and civic groups shall also be informed.

Legal notification with fourteen (14) days’ notice shall be given for all public hearings in compliance with governing regulations. Details of the notice include date, time, place and purpose of the public hearing. All County website notices will be posted in both English and Spanish.

Accommodations

Meeting the Needs of Non-English Speaking Persons

To provide full access to programs under the Consolidated Plan for non-English speaking persons, the following procedures have been established:

1. Dissemination of program materials, and notices of hearings to non-profit agencies serving the County's Spanish-speaking population.
2. Spanish interpreters shall be present at public hearings where the County feels that a significant number of Spanish-speaking persons may require such assistance

Meeting the Needs of Persons with Disabilities

1. Only sites with handicap access shall be selected for public hearings.
2. Upon request, interpreters for those who are hearing impaired will be provided. These or other provisions necessary to accommodate residents may be available if requested at least five working days prior to a hearing or meeting.
3. Outreach to community organizations representing disabled persons shall be part of the County's Consolidated Planning process.

Document Access

The County shall provide full public access to HUD Programs under the Consolidated Plan, including the following documents, which are maintained on file at the Office of Community Development.

1. Federal Regulations: The Community Development Block Grant Program and HOME Program related issuance and provision (i.e. Uniform Relocation Assistance).
2. Summary of the Housing and Community Development Act of 1977.
3. Title I of the Housing and Community Development Act of 1974, as amended.
4. County of Rockland Entitlement Grants to include Community Development Block Grant Program, HOME Program, ESG, and other HUD-funded programs.
5. County of Rockland: Consolidated Annual Performance Evaluation Reports (CAPERs).
6. County of Rockland: Citizen Participation Plan (CPP)
7. County of Rockland/HUD: Grant Agreements, Audit Records, Evaluation Reports, approval letters, and related correspondence.

8. County of Rockland: Records of public meetings, informal meetings with civic and neighborhood groups, and related notifications pertaining to programs under the Consolidated Plan.
9. Home Investment Partnership Act (HOME) 24 CFR Part 92.

Access to Records

Citizens, community organizations, public agencies and other interested parties shall be given reasonable and timely access to information and records relating to the County's Consolidated Plan and the County's use of assistance under the programs covered by the Consolidated Plan.

Records pertaining to the County's use of funds will be available to the public in the form of the Consolidated Plan/First Year Action Plan, CAPER, and other documents submitted to HUD upon grant close-outs. As previously indicated, the County will publish proposed funding allocations in *The Rockland Journal News* and *The Rockland Times*, the local papers of record. The Draft Consolidated Plan/First Year Action Plan will be made available at Rockland County Office of Community Development for review and sent to the Consortium Member Communities, so that citizens are afforded sufficient opportunity to review and provide comments on the document. Citizens will be provided a period of not less than 30 days to review the document and make comments. A summary of comments and responses will be attached to the Consolidated Plan/First Year Action Plan document.

Technical Assistance

Groups representative of persons of very low and low-income shall be provided, upon request, technical assistance in developing proposals for funding assistance under any programs covered by the Consolidated Plan.

Comments

Prior to submission to HUD of the Consolidated Plan, Annual Action Plan, Program Amendments, or the Consolidated Annual Performance Evaluation Report (CAPER), citizens or units of general local government shall be provided with a comment period of not less than 30 days. The County shall consider any comments or views of citizens (or unit of general local government) received in writing or orally at the public hearings, in preparing the final Consolidated Plan, Annual Action Plan, Program Amendments, or the CAPER.

Citizens may submit comments to the County's Consolidated Plan, Annual Action Plan, Program Amendments, or the CAPER directly to the Director of Community Development. Such objections must address the following issues, which are specified in HUD regulations:

The applicant's description of needs and objectives is plainly consistent with available facts and data; or the activities to be undertaken are plainly inappropriate to meeting the needs and objections identified by the applicant; or the application does not comply with HUD requirements regulating programs under the Consolidated Plan or other applicable

laws; or the application proposes activities which are otherwise ineligible as specified in applicable HUD regulations.

Citizen comments may be forwarded to:

S. Ram Nagubandi, Director
Office of Community Development
50 Sanatorium Road, Building K
Pomona, NY 10970

The County shall provide a timely, substantive written response to every written citizen objection or complaint, within 20 working days, where practical. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final Consolidated Plan, Annual Action Plan, Program Amendments, or the CAPER.

Citizen Participation Coordinator

The Director of Community Development has designated a Citizen Participation Coordinator whose responsibilities include:

- A. Organizing the public hearing, scheduling meetings with neighborhood and civic groups, ensuring compliance with the Plan and all applicable Federal regulations regarding Citizen Participation requirements pursuant to HUD regulations;
- B. Recording and responding to all written comments, proposals and complaints and ensuring the distribution of the same to staff members responsible for preparation/implementation of the programs; maintaining a record of all citizen proposals received by the County during the preparation of the Consolidated Plan application.
- C. Ensuring distribution of citizens' comments and complaints to staff members responsible for preparation/implementation of the program.