



New Castle County Department of Community Services

CITIZEN PARTICIPATION PLAN *for* HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS

In pursuant to Section 104 (a) (3) of the Housing and Community Development (HCD) Act of 1974, as amended, New Castle County's (NCC) Citizen Participation (CP) Plan ensures that the residents of the Urban County New Castle County are encouraged to participate in the planning and implementation of Community Development and Housing Programs administered by the Department of Community Services (CS).

This Citizen Participation (CP) Plan outlines methods used by New Castle County Department of Community Services (CS) to inform citizens of its Consolidated Plan for its housing and community development programs. The Consolidated Plan consists of a five-year Strategic Plan and a one-year Action Plan to meet the long-term goals established in the Strategic Plan. It serves as a planning document and as an application to the Department of Housing and Urban Development (HUD) for funding for various HUD programs for a given fiscal year.

The current Five-Year Consolidated Plan was developed in May 2015. Each year it is necessary to submit to HUD a new Action Plan to receive funding for the next fiscal year. The Citizen Participation Plan outlines citizen input into the planning process.

New Castle County's primary community development and housing programs are authorized under and partially funded by the following federal programs:

- The ***Community Development Block Grant (CDBG) Program***, authorized under the Housing and Community Development Act of 1974, as amended;
- The ***HOME Investment Partnerships Program (HOME)***, authorized under the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended;
- The ***Emergency Solutions Grant (ESG) Program (formally the Emergency Shelter Grant Program)***, authorized under the Stewart B. McKinney Homeless Assistance Act of 1987, as amended under the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, as amended; and

The Citizen Participation Plan herein governs the Department of Community Services consolidated planning process. It is distributed to agencies, citizen groups, and local jurisdictions, and its availability to others is advertised in local newspapers.

Citizens, organizations, private businesses, and local jurisdictions are encouraged to participate in the development and review of the Consolidated Plan's "Action Plan", any amendments to the Plan, and the performance report completed at the end of the program year. CS's plan for citizen involvement shall include the following elements:

- I. Encouragement of Citizen Participation
- II. Provisions of Information
- III. Access to Records
- IV. Technical Assistance
- V. Public Hearings
- VI. Consideration of Comments and Complaints
- VII. Criteria for Amendments to the Plan
- VIII. Key Dates
- IX. Adoption of the CP Plan

I. ENCOURAGEMENT OF CITIZEN PARTICIPATION:

- **Overall scheduling of citizen input opportunities:** All activities and their dates will be advertised in a timely manner through combinations of the following: local newspapers, public service announcements, notifications, CS Department websites, virtual meetings and special postings in public places such as libraries, government buildings, and local agencies. For activities dated "To Be Announced" (TBA), Community Services will provide timely notification of the meeting dates through the sources indicated. Additionally, the CP Plan will be periodically revised and distributed to reflect the new dates.
- **Reasonable accommodation for special populations:** All meetings will be held in *accessible* facilities. Additionally, all meetings, hearings, forums, etc., will be advertised with sufficient notice to enable those needing special accommodations to make their needs known to CS (non-English speaking persons; persons with mobility, visual or hearing impairments). Furthermore, notices, plans, etc., will be sent to agencies working with special populations so that agency staff can assist their constituents in reviewing/commenting on same. **Any individual needing reasonable accommodation should contact Nicole Waters at 302-395-5600.**
- **Low-Income Persons:** Meetings will be conducted in places and at times which will encourage participation by extremely low-, very low-, and low-income persons.

CS is interested in developing a one-year Action Plan that is both an effective and realistic working tool. In order to give County residents a variety of opportunities to help shape those plans, to amend them, and to review performance reports, CS will conduct the following activities:

A. Consultation: Forums, Meetings, Surveys, Sharing

In addition to encouraging participation by low-income persons, consolidation regulations require consultation with *"other public and private agencies that provide assisted housing, health services, and social services (including those focusing on services to children, elderly persons, persons with disabilities--including HIV-AIDS, homeless persons) during the preparation of the plan."* Concerning the portion of the Consolidated Plan which deals with lead-based paint hazards, regulations state that the jurisdiction *"shall consult with State or local health and child welfare agencies and examine health department data on the housing units in which children have been identified as lead poisoned."* Further, *"when preparing the description of priority nonhousing needs,"* jurisdictions *"must notify adjacent units of general local government"* plus *"consult with adjacent units of general local government, particularly for problems and solutions that go beyond a single jurisdiction."* CS must also *"consult with the local public housing agency...concerning consideration of public housing needs and planned Comprehensive Grant program activities."* **24 CFR Part 91**

1. Needs Assessment Meeting: One (1) major daytime meeting will be held regarding the housing and community development needs of those populations served by current sub-recipients and other agencies seeking funding from either jurisdiction.
2. Neighborhood Meetings: In addition to the above meeting, CS may hold neighborhood meetings to solicit citizen and agency input regarding the needs of County residents. Any public and private agencies which provide assisted housing, health services, and social services will be encouraged to attend any or all of these meetings to offer their input into the Consolidated Plan. Meetings will be held throughout the County. Times and places will be announced in the local newspaper.

It is important to note that the City of Newark administers a CDBG program on a pass-through basis. City of Newark public meeting information can be found on their website <http://www.newarkde.gov/313/Agendas-Minutes>

3. Cooperating Communities and the City of Wilmington: A total of 12 municipalities (outside of Wilmington) participate in the County's CDBG program, one (1) of which receives funding on a pass-through basis (Newark). The eleven which do not receive pass-through funding will be encouraged to attend the neighborhood meeting closest to their communities. Community Services will send a survey to all 12 municipalities to gather information from their staffs and elected officials regarding needs *only when updating the Strategic Plan portion of the Consolidated Plan*. No survey will be done during the current One-Year Action Plan planning process.

The City of Wilmington, the 13th municipality within New Castle County, does not participate in the County's CDBG program since it receives its own CDBG funding directly from HUD. When doing the survey mentioned in the preceding paragraph, the County also will send a survey to the City since information gathered regarding the City's needs will complete the picture on the needs of County residents, at large. Again, no survey will occur during the current One-Year Action Plan planning process.

4. Public Housing Consultation: While the County does not own any public housing units, it does administer the Housing Choice Voucher Program. CS staff, however, will consult with the Delaware State Housing Authority, Newark Housing Authority, and Wilmington Housing Authority to gather and evaluate their concerns when updating the Strategic Plan portion of the Consolidated Plan.

The City of Newark, however, *does* have its own Public Housing Authority. The City of Newark will consult with the Newark Public Housing Authority, both through correspondence and as a part of its meeting, to gather input regarding public housing needs. In particular, Newark will make efforts to encourage the participation of its public housing residents in neighborhood meetings.

5. Lead-Based Paint Hazards Consultation: CS staff will consult with State and local health and child welfare agencies regarding lead-based paint hazards.
6. Consultation with Adjacent Units of General Local Government: CS will consult with both the City of Wilmington (in addition to the periodic survey mentioned previously) and the State of Delaware regarding a number of aspects of the Consolidated Plan. Since each of these three jurisdictions prepares its own Consolidated Plan (the County, the State and the City of Wilmington), CS expects to participate in hearings, forums, meetings, and

so forth, which will be held by either of the other jurisdictions. Moreover, it is expected that some of the events may be jointly sponsored (such as the needs assessment meeting mentioned earlier in this document), particularly when problems cross jurisdictional boundaries (such as affordable housing needs, homelessness, etc.).

7. Participation in Non-Consolidated Hearings/Forums:
As permitted, CS plans to attend, participate in, and be a part of, the agenda of hearings, forums, and so forth, being conducted by other agencies/ jurisdictions when the topics support the Consolidated Plan requirements.
8. Sharing of Information: CS will to share its Consolidated Plans with jurisdictions in the surrounding area, including those in Pennsylvania, Maryland and New Jersey.

B. The City of Newark Community Development / Revenue Sharing Advisory Committee

The City of Newark, which receives approximately \$300,000 in CDBG funds each fiscal year on a pass-through basis, has a Community Development / Revenue Sharing Advisory Committee (CDAC). The group meets approximately five times per year. Each year at the start of Newark's proposal process, the CDAC holds its own Public Hearing to gather input from the community. Members then hold a series of proposal review meetings, before making funding recommendations to its City Council. In the winter and spring, they meet again to review amendments, develop proposal review procedures for the coming fiscal year, and so forth. Key dates for CDAC meetings can be found on their website: <http://www.newarkde.gov/313/Agendas-Minutes>

II. PROVISION OF INFORMATION:

A. Required Information and Timing:

All citizens and units of local government will be furnished appropriate information. Specifically:

1. Consolidated Plan/Performance Reports
Before adoption of the Consolidated Plan, CS will make available to citizens, public agencies, and other interested parties, information that includes the amount of assistance CS expects to receive; the range of activities that may be undertaken, including the amount that will benefit persons of very-low and low-income; the plans to minimize the displacement of persons and to assist any persons displaced; and a statement that the activities may have an effect on historic properties. CS will publish a summary of the Draft Consolidated Plan for comment in the primary local newspaper--the *News Journal*. The published summary will describe the contents and purpose of the Consolidated Plan and it will include a list of the locations where copies of the entire plan may be picked up and/or examined. Copies of the full draft plan will be made available on the Department of Community Services website: <http://www.nccde.org/456/Community-Development-Housing> , at libraries, government offices, and other public places. Additionally, citizens also will be able to get copies of the Consolidated Plan on disk.

Additionally, CS will notify citizen and units of local governments of the availability of the Consolidated Plan as adopted, any amendments to the Plan, and its performance reports, as these documents are developed, to afford citizens a reasonable opportunity to examine their contents.

Prior to submission of the Consolidated Plan to HUD, CS will provide a comment period of thirty (30) days to receive comments from citizens or units of local government on the Consolidated Plan and amendments.

Performance reports which are submitted to HUD will provide a comment period of fifteen (15) days to receive comments from citizens or units of local government.

2. Environmental Review

In accordance with the Environmental Review responsibilities (24 CFR Part 58) and the National Historic Preservation Act requirements (24 CFR Part 800) the public and interested persons are included in the Environmental Review process as follows:

- a. A listing of persons/agencies that have an interest in historic resources or other environmental issues is maintained by CS. These persons/agencies receive notices regarding program activities and their potential impact on historic or other environmental resources.
- b. The Consolidated Plan newspaper notice references the potential impact on historic or other environmental resources.
- c. Regarding Environmental Assessments and per environmental regulations, CS will, at a minimum, send Finding of No Significant Impact (FONSI) notices or combined FONSI/Request for Release of Funds notices to individuals and groups known to be interested in the activities; to local news media; to appropriate local, state and federal agencies; to the Regional Office of the Environmental Protection Agency; and to the HUD Field Office. CS may also publish the notice(s) in a newspaper of general circulation in the affected community. If CS does not publish the notice(s), it will prominently display it/them in public buildings, such as local Post Offices and within the project area.

B. Mailings/Newspaper Public Notices/Radio Public Service Announcements/Virtual Meetings:

Because the Consolidated Plan requires so much more by way of citizen involvement, notification, etc., it is expected that CS's primary vehicles for notifying the public of any public hearings/meetings, etc., will be newspaper public notices, the CS website, radio public service announcements, virtual meetings, as well as electronic mailings to present and past sub-recipient agencies and agencies who have expressed interest in funding. Additionally, as in the past, the local newspaper will be utilized for required environmental review notices.

III. ACCESS TO RECORDS

Copies of current key documents--*the Consolidated Plan, Performance Reports, required Amendments, Environmental Records, and other key documents*--are available for citizens to review upon request, at the office of the Department of Community Services, Division of Community Development and Housing (77 Reads Way, New Castle, DE 19720), and on the Department of Community Services website: <http://www.nccde.org/456/Community-Development-Housing>. Additionally, CS will make available reasonable access to records regarding uses of assistance it has received during the preceding five (5) years, consistent with state and local laws regarding privacy and obligations of confidentiality.

IV. TECHNICAL ASSISTANCE

Technical assistance will be provided to groups' representative of persons of very low- and low-income that request assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. A proposal packet with forms and instructions has been developed which is made available for distribution initially at the fall Public Hearing and on the Department of Community Services website following the fall Public Hearing. Extra copies of this package are available to community-based and human service organizations for use in their outreach efforts to local neighborhood groups. Persons who do not have computer or internet access may contact CS to have an application mailed to them.

Additionally, each year CS holds a **Proposal Kickoff Meeting** at the start of the proposal period to review all requirements of the proposal package and to make staff available to assistance. Persons are identified in the proposal package and phone numbers supplied for additional help. Anyone else interested in further information about proposals and their completion can call CS's Program Development Division, (302) 395-5600.

V. PUBLIC HEARINGS

A. CS Public Hearings:

As stated earlier, CS will continue to hold a minimum of two Public Hearings, one in the fall and one in the spring, to solicit citizen input, to brief citizens on program progress to date, and to solicit citizen comments regarding the adequacy of performance.

B. City of Newark Public Hearings:

In addition to CS's Public Hearings, the City of Newark holds a Public Hearing in June of each year to solicit citizen input into its programs, which are limited to those serving the population within the City limits. (Traditionally, Newark has conducted its proposal process earlier than CS in order to assure that its work was completed in time to fold into the County's process.) As stated earlier, CS will conduct a neighborhood meeting for Newark and the surrounding community. This meeting will complement the City's Public Hearing, offering the City additional information which it can use in its planning process, as well providing CS with information on needs *outside* the City limits. Please contact the City of Newark (302)-366-7000 with questions regarding public hearings and the planning process

C. New Castle County Council Meeting:

After all comments have been received, logged, considered, and answered, the Consolidated Plan will be submitted to New Castle County Council at its regular meeting for approval by that body prior to submission. In addition, the City of Newark submits its plan to Newark City Council *before* it is submitted to CS and incorporated into the County's Consolidated Plan. Council meetings for each of the jurisdictions are publicized and open to the public.

VI. COMMENTS AND COMPLAINTS:

CS will consider any comments or views of citizens or units of local government received in writing, or orally at the public hearings, forums, meetings, etc., in preparing the county's final Consolidated Plan or Performance Report. A summary of these comments or views, and summary of any comments or views not accepted and the reasons, therefore, shall be attached to the final Consolidated Plan, amendment of the Plan or Performance Report.

CS shall provide a timely, substantive written response to every written citizen complaint, within fifteen (15) working days, where practicable. If a citizen is unsatisfied with the response, he/she may request a meeting with the Director of CS, who may, at his/her discretion and with the consent of the complainant convene a three-member Community Development Complaint Review Board which will include the Director and at least one representative from the local community. At the conclusion of the hearing, the Director or the Review Board will make recommendations to the County Executive regarding the disposition of the complaint.

VII. CRITERIA FOR AMENDMENT TO PLAN:

According to federal regulation (24 CFR 91.505 (a) (1-3)), amendments must be made to the Consolidated Plan whenever CS makes one of the following decisions:

1. Makes a substantial change in its allocation priorities or a substantial change in the method of distribution of funds;
2. Carries 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. Substantially changes the purpose, scope, location, or beneficiaries of an activity.

Federal regulation (24 CFR 91.505 (b)) describes the criteria for substantial amendments.

The jurisdiction shall identify in its citizen participation plan the criteria it will use for determining what constitutes a substantial amendment. It is these substantial amendments that are subject to a citizen participation process, in accordance with the jurisdictions plan outlined in (24 CFR 91.105), Citizen Participation Plans for local governments.

With that in mind, CS, when preparing a substantial amendment, will give the public the opportunity to comment on proposed changes. Specifically, the proposed changes will be published in the public notices section of the *News Journal* and posted on the CS website: <http://www.nccde.org/456/Community-Development-Housing>. Comments will be requested for a thirty- (30) day period, after which time CS will consider any comments received, respond in writing regarding the comments, and, if appropriate, modify the proposed actions. Amendments then will be submitted to HUD. In the event that the final amendment differs from those which were published as "proposed", the final action will be described in a *News Journal* public notice.

In the event that a change is being proposed to assist an activity of an urgent nature, the same procedure as noted above will be followed. Comments will be accepted for a seven (7) day period, however.

Per federal regulation (24 CFR 91.505 (b)), the jurisdiction shall identify criteria it will use for determining what constitutes a substantial amendment. It is these substantial amendments that are subject to a citizen participation process.

CS will complete an amendment for anything which it considers a "substantial change". "Substantial change" shall be defined as follows:

1. Any changes to the Goals outlined in the Consolidated Plan;
2. Any changes to the Priorities outlined in the Consolidated Plan;

3. The addition of an activity not included in the One-Year Annual Action Plan; and
4. Changes in the use of funds from one eligible activity to another outlined in the One-Year Annual Action Plan

VIII. KEY DATES:

Table 1: Citizen Participation Requirements

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Activity:	Frequency:	Due Date:	Comment Period:	Public Hearings:
Consolidated Plan	Every 5 Years	May 15th	30 Days	2
Assessment of Fair Housing (AFH)	Every 5 Years	October 4th	45 Days	1
Annual Action Plan	Every Year	May 15th	30 Days	1
Amendments to the Consolidated or Annual Plan	As Needed	As Needed	30 Days	1
Consolidated Annual Performance Evaluation Report (CAPER)	Every Year	September 30th	15 Days	N/A
Amendment to AFH	As Needed	As Needed	45 Days	N/A

IX. ADOPTION OF THE CP PLAN:

This CP Plan and all amendments to this plan thereto, will be made available to the public as per a notice in the News Journal and the CS website: <https://www.nccde.org/1274/Plans-Reports>. Comments received in accordance with instructions in the *News Journal* notice will be considered prior to adoption of the Plan. The CP Plan will be considered adopted if, after publication, comments received were considered and incorporated, if necessary. Upon adoption, notice of the adopted CP Plan's and its availability will be made known to those on CS's mailing list (Stakeholder's List), as well as to agencies that provide assistance to persons with disabilities.

X. In the Event of an Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, CS may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide comment in real time. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via CS's website.

In the event of an emergency, the following alternatives may be instituted by CS:

1. The public comment and display period for the Consolidated Plan or Annual Action Plan may be shortened to no less than five days.
2. Draft documents for public comment and review will be made available on the CS website at <https://www.nccde.org/1274/Plans-Reports>. Copies of the draft documents will be mailed or e-mailed upon request, if possible.
3. Public meetings may be held as virtual meetings using local cable access television or other online platforms for public viewing with the option for real-time questions to be presented.
4. CS may opt to hold one public hearing during the Consolidated Plan/Annual Plan process and its second required public hearing during the CAPER process for the same program year.

Persons needing assistance reading this document, making responses, or requiring special assistance at the Public Hearing, due to physical impairment or Limited English Proficiency are encouraged to contact our office. This Citizen Participation Document is available using the following link:

<https://www.nccde.org/1274/Plans-Reports>

Contact Information:

Nicole Waters, Department of Community Services, 77 Reads Way, New Castle, DE 19720,
302-395-5644, TDD 302-395-5593, Nicole.Waters@newcastlede.gov