

REVISED 8/16/2021

CITIZEN PARTICIPATION PLAN
APPLICABLE TO ALL RESIDENTS

This Citizen Participation Plan (Plan) has been developed by Upper Darby Township, Pennsylvania, to provide all citizens/residents, public and private agencies, as well as adjacent units of general local government including local government agencies with metropolitan-wide planning responsibilities, an adequate opportunity to participate in an advisory role in the planning, implementing, and assessing of the Consolidated Plans, Annual Action Plans, Annual Performance Reports (CAPER) and all substantial changes to those plans in accordance with 24 CFR Part 91.105.

This Plan is amended as a result of the Mega Waiver issued by John Gibbs, Acting Assistant Secretary of the U.S. Department of Housing & Urban Development dated 3/31/2020 which expires 8/16/2021.

This Plan sets forth Upper Darby Township's policies and procedures for citizen/resident participation to provide for and encourage citizens/residents to participate in the development of the Five Year Consolidated Plan, One Year Action Plan and any substantial amendments to Plans and the Consolidated Annual Performance Evaluation Report (CAPER).

I. Administration

A. Upper Darby Township as a Community Development Block Grantee (CDBG) Entitlement Grantee will be responsible for the preparation of a Five Year Consolidation Plan and an Annual Action Plan which outlines their goals and uses of CDBG funding. This Plan shall provide for a process of Consultation with citizens, residents local governments in accordance with Citizen Participation at §91.105. Also, this Plan shall provide for a process to receive citizen/resident participation at the community-wide level, as well as the neighborhood level designed to especially encourage participation by low and moderate income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used. This Plan will also take actions appropriate to encourage the participation of all citizen/resident including minorities and non-English speaking persons, as well as persons with disabilities. All aspects of the citizen/resident participation shall be conducted in an open manner, with freedom of access for all interested persons.

II. Consultation

- A. When preparing the Five Year Consolidation Plan the One-Year Action Plans, Upper Darby Township shall consult 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, persons with HIV/AIDS and their families, homeless persons). Upper Darby Township shall provide technical assistance to non profit organizations who serve the low and low/mod residents of Upper Darby Township in submitting requests for funding.
- B. When preparing the Plans, Upper Darby Township shall notify adjacent units of general local government, to the extent practicable.
- C. Upper Darby will also consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities where they exist, particularly for problems and solutions that go beyond a single jurisdiction.

III. Citizen Comment on Citizen Participation Plan and Amendments

Upper Darby Township has provided citizens/residents with reasonable opportunity to comment on the development of this Plan. Any proposed, substantial amendments to this Plan will require Upper Darby Township to provide citizens/residents with a reasonable opportunity to comment on said amendments. Upper Darby Township has made the proposed and final Citizen/Resident Participation plans public. This Plan will be in a format accessible to persons with disabilities, upon request. Annually, citizens/residents shall have the opportunity to effectuate changes in this Plan. Notices will advise residents that the Plan is available for review/comment/possible revision. It will also note that persons with Limited English Proficiency will, upon request, be provided a translated copy of a particular Notice. Likewise, persons requiring a Braille copy will be assisted upon request.

IV Five Year Consolidated Plan and One Year Action Plan Development

A. Public Hearings

- (1) In order to ensure that maximum citizen/resident participation is achieved in the formulation of the Plans, Upper Darby Township

shall provide Public Notice of all plans and provide for a 30 day comment period and Public Hearings regarding the Plans.

- (2) In order to adequately inform the public of these public hearings, Upper Darby Township shall notify citizens/residents in accordance with Section V. of this Plan, as amended
- (3) The Township, upon request, will provide reasonable access/accommodations for persons with disabilities and where permitted by Pennsylvania law remote access.

B. Purpose of Public Hearings

- (1) The purposes of public hearings shall be the following:
 - (a) To enable the Township of Upper Darby to disseminate the following program information as it pertains to the Five-Year Consolidated Plan and the One Year Action Plan:
 - (i) The amount of assistance Upper Darby Township expects to receive, including grant funds and program income for the Five-Year Consolidated Plan, as well as the One-Year Action Plan.
 - (ii) The range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.
 - (b) To enable citizens/residents to elicit their views on the development of community development needs and proposed activities, including the development of the Five-year Consolidated Plan and One-Year Action Plan.
 - (c) Take requests to schedule providing technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance. Upper Darby Township shall determine the level and type of assistance available in local program year.
 - (d) Review program performance.
 - (e) Respond to proposals and questions germane to the Plans.

- (f) Enable citizens/residents to elicit their view on the development of community development needs, and proposed activities including the development of the Five-Year Consolidated Plan and One-Year Action Plan.

C Consolidated Annual Performance Report (CAPER)

Upper Darby Township is required to submit to the US Department of Housing & Urban Development (HUD) a CAPER outlining the accomplishments, how the funding was spent, how low and low/mod residents were benefited within 90 days of the end of their Program Year of October 31.

- (1) Upper Darby will publish a Public Notice prior to submission of the CAPER for citizen/resident comment for a 15 day period prior to submission of the CAPER to HUD.
- (2) Copies of the CAPER will be available to review upon request and will be available at the local libraries for review.
- (3) The letter from HUD received annually upon their review of the Plan will also be made available to the public.

D Results of Public Hearings:

- (1) All comments and proposals which are rendered as a result of any Public Hearing shall be noted and carefully considered by Township Officials, in the preparation of future planning toward the development of the Five Year Consolidation Plan and the One-Year Action Plan.
- (2) Upper Darby Township shall consider both oral and written comments and views of citizens/residents in preparing the Plans. A summary of the comments or views, and a summary of the comments or views not accepted and the reasons therefore, shall be attached to the Plans in accordance with Federal Regulations at §91.105(b)(5).

E Publication of the Proposed Five-Year Consolidation Plan + One Year Action Plan and CAPER

- (1) Upper Darby Township shall publish in one local newspaper of general circulation, notice of the proposed Five-Year Consolidated

Plan, proposed One-Year Action Plan and the Annual Performance Report (CAPER) in a manner that affords citizens/residents, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. Said summary will describe the contents and purpose of the Five-Year Consolidation Plan, including the One-Year Action Plan and the CAPER and will include a list of the locations where copies of the entire Plans may be examined; and said locations will include but not be limited to libraries, government offices, and public places. The Plans will also be made available upon request.

F. Criteria for Amendment to Programs:

The Township may decide to amend its approved programs based upon one of the following decisions:

1. To make substantial changes in amounts approved for an activity.
2. To undertake a new activity, using funds from any program covered by a program (including program income), which was not previously described in an action plan or funding application.
3. To decide not to carry out an activity for which funding is approved; or;
4. To substantially change the purpose, scope, location, or beneficiaries of an activity.

Substantial change in Item 4 above is where the change (increase or decrease in the size of the service area and /or class of beneficiaries of an activity) is greater than 25%. Such courses of action would constitute an amendment to an approved program.

Substantial change in amounts is defined as the increase or decrease in the cost of an approved activity if the project balance is increased by more than 50%.

V. Notice of Public Hearings

In order to attain the involvement of citizen/resident participation at both the community-wide and neighborhood levels, especially by low and

moderate income persons, Upper Darby Township shall encourage citizen/resident participation by the following:

- (1) Upper Darby Township shall, thirty days before submission of the Plans publish a notice in one (1) Newspaper of general circulation, under the Legal Section. Each notice shall reflect sufficient information about the subject of the hearing to permit informed comment.
- (2) All of the aforementioned notices to announce the public hearings, through each of the aforementioned media vehicles, shall indicate the date, time and meeting method which are convenient to potential and actual beneficiaries with accommodation for persons with disabilities.
- (3) There is now an identifiable segment of Upper Darby Township's population who are non-English speaking residents. Each published notice shall include a Vietnamese, Bengali and Spanish insert (in addition to a full English version). The insert will notify Limited English Proficiency persons that a full copy in their language will be provided upon request. Other languages will be provided upon request also.

VI. Meetings

- (1) Upper Darby Township will conduct a minimum of two Public Hearings for citizen/resident comment prior to submission of the Plans. One will be for the Draft Plan and the second will be for the Final Plan and will be at the monthly scheduled Council Meeting.
- (2) Upper Darby Township shall provide citizens/residents with reasonable and timely access to all meetings, including public hearings.
- (3) Citizens/Residents may submit comments in writing in lieu of attending the meetings.

VII. Availability to the Public

- C. In accordance with §91.IOS(g), the Five Year Consolidated Plan, One-Year Action Plan as adopted, Substantial Amendments, and the performance report (CAPER) will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. These documents will be available by calling or writing to Upper Darby Township as indicated below:

Upper Darby Township
Municipal Building, Room 310
100 Garrett Road
Upper Darby, PA 19082-3135
E-Mail grants@upperdarby.org
Telephone: (610) 734-7613
TDD No.: (610)734-7722

VIII. Access Records

- A. Upper Darby Township shall provide citizens/residents, public agencies, and other parties with reasonable and timely access to information and records relating to Upper Darby Township's Five Year Consolidated Plan the One-Year Action Plan and Annual CAPER.
- B. Any and all records referred to by VIII.A. of this Plan shall be consistent with and subject to applicable Federal, State and local laws regarding personal privacy and obligations of confidentiality.
- C. Access to records may be made by contacting the aforementioned Department as outlined in Section VII.A. of this Plan.

IX. Technical Assistance

- A. Upper Darby Township shall take requests to schedule the provision of technical assistance, in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan.
- B. Technical assistance shall be provided by Upper Darby Township's Community Development Division, at any time during the year, at no cost to the recipient.
- C. The Level and type of assistance will be determined by Upper Darby Township.
- D. Technical assistance need not include the provision of funds to the Groups.

X. Complaints/Comments

- A. Upper Darby Township shall provide for appropriate and practical procedures to govern the handling and answering of comments from citizens/residents related but not limited to the Consolidated Plan, Action

Plan, Amendments, and the CAPER, in a timely and responsive manner in accordance with the following:

- (1) Oral comments, which are directed to the Township, shall receive an oral response within fifteen (15) workdays by the Township.
- (2) Upper Darby Township shall make every reasonable effort to provide written response to any and all written comments within fifteen (15) workdays. All Townships written responses will be substantive written responses.
- (3) Comments (oral or written) may be directed to Upper Darby Township at any time during the year to the Department outlined in Section VII.A.

XI. Use of Citizen Participation Plan

Upper Darby Township shall follow this Citizen Participation Plan, pursuant To §91.105(k) of 24 CFR Part 91 et al.

XII. Jurisdiction of Responsibility

The requirements for citizen/resident participation as prescribed by this Plan does not restrict the responsibility or authority of Upper Darby Township for the development and execution of its Five Year Consolidation Plan, One-Year Action Plan and Annual CAPER.

XIII. Anti-Displacement

Upper Darby has adopted an Anti-Displacement Plan of persons and to assist those displaced. No displacement is proposed or expected.