

CAMDEN COUNTY, NEW JERSEY



Making It Better, Together.

www.camdencounty.com

CITIZEN PARTICIPATION PLAN

OFFICE OF COMMUNITY DEVELOPMENT

Revised June 17, 2020

L Purpose

This *Citizen Participation Plan* (“*CPP*”) is for Camden County, New Jersey, which administers Federal Entitlement Programs funded through the U.S. Department of Housing and Urban Development (HUD) for the County. The entitlement communities consist of all the municipalities in Camden County except Camden City, Cherry Hill Township, Gloucester City, Gloucester Township, Pine Valley Borough, and Tavistock Borough. Camden County also is the lead jurisdiction for the Camden County HOME Consortium, which includes Camden County CDBG communities, Cherry Hill Township, Gloucester City and Gloucester Township. The purpose of this *Citizen Participation Plan* is to provide citizens within Camden County with a plan setting forth how they may choose to have a voice in the development, implementation, and evaluation of the Federal Entitlement Programs funded through the HUD.

This *Citizen Participation Plan* is designed to serve the following specific purposes:

- A. To present in a logical sequence the various components of the Entitlement Programs.
- B. To identify the responsible departments or agencies of the Camden County government who administer components of the Entitlement Programs.
- C. To clarify the opportunities that individual citizens, community organizations, and neighborhood groups will have to work with Camden County officials in developing each part of the Consolidated Plan and Annual Action Plans, from application development to program evaluation.
- D. To indicate the alternate courses of action that the Federal regulations make available to citizens and organizations.
- E. To act as a coordinating vehicle for citizen participation to be used by all agencies or officials responsible for various components of Camden County's Consolidated Plan and Annual Action Plans.

Any questions or comments on substantive issues or the adequacy of the CPP should be referenced to the Camden County Office of Community Development, Anthony Bianco, Director, 520 Market Street, 12th Floor, Camden NJ, 08102-1375. Telephone: 856-225-5559 or TDD Users may use 7-1-1 (NJ Telecommunications Relay). Email, anthony.bianco@camdencounty.com.

II. Mechanisms for Development of Citizen Participation

- A. The Camden County Office of Community Development shall be responsible for the *Citizen Participation Plan* including its dissemination and any revisions, which may be appropriate at the time, that Camden County begins planning for each new program year in January.
- B. Prior to the initial adoption of the *Citizen Participation Plan*, the Board of Chosen Freeholders shall be provided with a copy of the *Citizen Participation Plan* and requested to announce its availability for public review at the Board of Chosen Freeholder's next regular meeting.
- C. Camden County will issue an advertisement concerning the availability of this *CPP*. The advertisement will appear in a newspaper of general circulation at least ten (10) calendar days prior to the adoption of the *CPP* and will indicate the locations at which the document will be made available for public review.
- D. Any individual citizen or organization submitting a written comment will receive a response from Camden County indicating the actions taken concerning the recommendations and the decision made with respect to that recommendation. Correspondence should be addressed to the Camden County Office of Community Development, Anthony Bianco, Director, 520 Market Street, 12th Floor, Camden NJ, 08102-1375, anthony.bianco@camdencounty.com.

III. Consolidated Plan Process

A. Purpose of Consolidated Plan

HUD has amended regulations and procedures for applying for entitlement funds with a rule that consolidates into a single submission the planning and applications aspects of the Community Development Block Grant (“CDBG”) Program, Emergency Solutions Grant (“ESG”) Program, Home Investment Partnerships (“HOME”) Program, and the Housing Opportunities for persons with AIDS (“HOPWA”) Program. The rule also consolidates the reporting requirements for these programs, replacing the general performance reports with one performance report. The new consolidated document is referred to as the Consolidated Plan.

The Consolidated Plan serves the following functions:

- (1) A planning document for communities, which builds on a community participation process at the lowest levels.
- (2) An application for federal funds under HUD's formula grant programs.
- (3) A strategy to be followed in administering HUD programs.

The Consolidated Plan cites estimated housing needs projected for the ensuing five-year period. The Annual Action Plan describes Camden County's intended use of the entitlement funding to be

received for a particular fiscal year.

B. Development of the Annual Action Plan Application

1. Provision of Adequate Information

At the time that Camden County initiates the preparation of the Annual Action Plan in a new program year, a package of information will be compiled by the Camden County Office of Community Development for reference by individual citizens or organizations. This package will include:

- a. The total amount of entitlement funds to be made available to Camden County.
- b. The range of activities that may be undertaken with Federal funds and the kinds of activities that was funded and is still eligible under Federal regulations.
- c. The process to be followed in preparing and approving the application, including the tentative schedule of meetings and hearings.
- d. The *Citizen Participation Plan*.

Residents and organizations in Camden County will be able to review this information relative to the *Citizen Participation Plan* at the Camden County Office of Community Development, 520 Market Street, 12th Floor, Camden, NJ 08102-1375 and www.camdencounty.com

2. Provision of Technical Assistance

Technical assistance will be provided to citizens and citizen organizations so that they may adequately participate in planning, implementing, and assisting Entitlement Program development and to groups of low and moderate income persons and groups of residents of blighted neighborhoods, which request assistance in preparing proposals by staff personnel within Camden County. Technical assistance will consist of:

- a. Answering questions orally or in writing concerning the procedures and timetable for the preparation of Applications, the eligibility under Federal regulations of various types of proposals or other Federal regulations governing application development or program implementation.
- b. Provisions of available information and data, which would pertain to the preparation of proposals for funding through the Entitlement Program or statements of view concerning ongoing programs or policies.

Citizens or organizations requiring technical assistance should contact the Camden County

Office of Community Development, Anthony Bianco, Director, 520 Market Street, Camden, NJ 08102-1375, Telephone: 856.374.2581 or TDD Users may use 7-1-1 (NJ Telecommunications Relay), email anthony.bianco@camdencounty.com

3. Public Hearings:

Public hearings will be another basic way by which residents and organizations of Camden County will be given an opportunity to obtain information on the Entitlement Programs and to provide input into the development of the programs and applications for these funds. Camden County will hold at least two public hearings per year to obtain citizens' views and to respond to proposals and questions. These hearings will be held at two different stages of the program planning process.

a. Initial Public Hearing

The first hearing will serve several purposes, such as providing a summary of program requirements, answering questions about the Five (5) Year Consolidated Plan and Annual Action Plan process, handled on a chronological basis, that is, from development of the application to final evaluation, and to obtain views and review proposals of citizens and organizations at the initial stage of preparation of the program. An announcement of the hearing will be published in local and regional newspaper publications and mailed to the agencies that represent low income populations and those that may not read the newspaper and posted on www.camdencounty.com

The purpose of this initial hearing is to obtain the views of citizens and organizations regarding overall community development and housing needs, development of proposed activities, including the estimated amount that will benefit persons of low and moderate income, and to review program performance.

This Public Hearing is usually conducted as part of the CDBG Advisory Board meeting. The Advisory Board is made of representatives of each of the County CDBG participating communities. It is the intent that these representatives will provide input regarding their particular community needs. The representatives can provide comment on behalf of the persons from their population that are the least likely to participate or comment.

The intent of this meeting(s) will be to provide a mechanism of citizen participation at the County-wide, municipal and neighborhood level. Comments or recommendations on projects in specific localities will be encouraged.

This hearing will be conducted by the Camden County Office of Community Development, which is responsible for preparation of the application.

Persons who are elderly or handicapped and who would otherwise be unable to attend may

receive transportation to these meetings if such transportation can be arranged. Such persons should contact the Camden County Office of Community Development, Anthony Bianco, Director, 520 Market Street, 12th Floor, Camden, NJ, 08102-1375. Telephone: 856-225-5559 or TDD Users may use 7-1-1 (NJ Telecommunications Relay), Email- anthony.bianco@camdencounty.com, and request such assistance.

The Camden County Office of Community Development will be charged with trying to arrange transportation and notifying the individual of the arrangements or the unavailability thereof. Generally, such request should be made at least two (2) working days prior to the hearing day.

Accommodations may be made for limited English-speaking persons or persons who are deaf or hard of hearing. Translation assistance will be provided so that they may participate effectively in the hearing. Please contact the Camden County Office of Community Development to make such arrangements.

Notice of the hearing will appear in the non-legal section of a newspaper of general circulation within Camden County. The notice shall be published at least ten (10) days prior to the public hearing. Notice will also be provided to agencies serving low income and other hard to reach communities. A list of agencies that will be included in the mailings can be found in the Appendix.

b. Second Public Hearing

A second hearing will be undertaken when the draft Five (5) Year Plan and/or Annual Plan has been prepared.

Upon completion of the proposed Consolidated Plan and/or Annual Action Plan, Camden County shall publish a summary of the proposed Plan in sufficient time to permit citizens to comment on the Plan prior to its approval and adoption by the Board of Chosen Freeholders. The notice will appear in the non-legal section of the *local regional publication* and mailed to agencies that represent low income populations and those less likely to read the newspaper. The ad will appear at least thirty (30) calendar days prior to the adoption of the Plan and will indicate the locations at which the Plan will be made available for public review.

The second hearing will be conducted during the thirty (30) day review period of the proposed Plan. The notice of this second hearing may be combined with the notice of availability of the Draft Plan. However, the notice must allow at least ten (10) days from the date of publication to the date of hearing.

This hearing will be conducted by the Board of Chosen Freeholders and/or the Camden County Office of Community Development.

Persons who are elderly or handicapped and who would otherwise be unable to attend may

receive transportation to these meetings if such transportation can be arranged. Such persons should contact the Camden County Office of Community Development, Anthony Bianco, Director, 520 Market Street, 12th Floor, Camden, NJ, 08102-1375. Telephone: 856-225-5559 or TDD Users may use 7-1-1 (NJ Telecommunications Relay), Email- Anthony.bianco@camdencounty.com and request such assistance.

The Camden County Office of Community Development will be charged with trying to arrange transportation and notifying the individual of the arrangements or the unavailability thereof. Generally, such request should be made at least two (2) working days prior to the hearing day.

Accommodations may be made for limited English-speaking persons or persons who are deaf or hard of hearing. Translation assistance will be provided so that they may participate effectively in the hearing. Please contact the Camden County Office of Community Development to make such arrangements.

Following the thirty (30) day review period, the Board of Chosen Freeholders will take formal action on the application and forward it to the appropriate funding agency.

4. Public Display Period

The Consolidated Five (5) Year Plan and Annual Action Plan shall be placed on public display for a period of thirty (30) days. The Plan(s) will be made available at several locations in the county and will be available on the county's website: www.camdencounty.com

Locations that the Plan will be placed on display include:

Camden County Community Development Office
520 Market Street, 12th Floor
Camden, NJ 08012-1375

Camden County Library
William Rohrer Branch 5
MacArthur Boulevard
Haddon Twp. NJ 08108

Camden County
Improvement Authority
Voorhees Town Center
Voorhees, NJ 08043

Accommodations may be made for limited English-speaking persons or persons who are blind or visually impaired. Translation assistance will be provided.

5. Acceptance of Written Comments, Proposals, or Recommendations:

At the time that planning begins for each year, organizations within Camden County will have the opportunity to submit comments, proposals, or recommendations on the Community Development Program. Any resident or property owner in Camden County or any organization representing Camden County residents or property owners may participate.

Such a comment, proposal or recommendation may be directed to the attention of the Camden County Office of Community Development, Anthony Bianco, Director, 520 Market Street, 12th Floor, Camden NJ, 08102-1375, Telephone: 856-225-5559 or TDD Users may use 7- 1- 1 (NJ Telecommunications Relay), [Email: anthony.bianco@camdencounty.com](mailto:anthony.bianco@camdencounty.com).

At all times all written statements received will receive a written response no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. However, written statements that are intended to suggest modifications to the application can only be considered if they are received by the end of the thirty (30) day review period on the draft Action Plan.

6. Complaint Procedure:

Any individual or organization may choose to file a complaint concerning Camden County's Entitlement Programs. Complaints should be forwarded to the Camden County Office of Community Development, 520 Market Street, 12th Floor, Camden, NJ, 08012-1375. The complaint should contain the following information:

- a. The name and signature of the complainant, or if any organization has prepared the complaint, the name and signature of the officer of the organization responsible for correspondence.
- b. The address to which Camden County's response should be mailed.
- c. A telephone number where the complaint or an individual knowledgeable about the substance of the complaint can be reached during daytime hours.
- d. The nature of the complaint, including any relevant information or documentation.
- e. A recommendation concerning how the complainant wishes to have the matter resolved.

The Camden County Office of Community Development will make every reasonable effort to

provide a written response to a complaint within fifteen (15) days of its receipt. Camden County will indicate its position on the matter and the action it proposes to take. The Camden County Office of Community Development will not be obligated, however, to respond to any anonymous or fictitious complaints.

If the Camden County Office of Community Development's response does not resolve the problem to the satisfaction of the complainant, he or she within two (2) weeks of the response by the Camden County Office of Community Development may request a meeting with the appropriate Camden County Office of Community Development officials to resolve the problem. This meeting, whenever possible, shall be held within fifteen (15) working days of receipt of the request for a meeting.

Following such meeting Camden County shall notify the complainant of its proposed resolution within ten (10) working days of the date of the meeting. If the complainant feels that the response is still not satisfactory, the complainant may follow the procedure described in the following section: The above complaint procedure shall not be considered a prerequisite for persons or organizations wishing to file objections to applications pursuant to Federal regulations.

C. Filing Objections with Federal Funding Agency

Individuals or organizations who have followed the procedure described above to resolve complaints may choose to file an official objection with the U.S. Department of Housing and Urban Development, New Jersey State Office, Thirteenth Floor, 1 Newark Center, Newark, NJ 07102-5504. Persons may choose to file a complaint directly with HUD and not follow the local complaint procedure established in #6 above. Following the local complaint procedures is not a prerequisite to filing an objection with HUD. However, citizens are encouraged to bring complaints first to the local level for resolution since HUD procedures require Camden County to respond to any complaint filed with HUD. Therefore, the best chance for immediate resolution to the problem rests at the County level.

D. Criteria for Amendment to Programs

1. Camden County or one of our participating communities may decide to make minor or substantial amendments to its approved programs. Substantial change is defined as the increase or decrease in the cost of an approved activity by more than 25 percent or the change (increase or decrease) in the service area and/or class of beneficiaries of an activity. Such a course of action would constitute an amendment to an approved program. Camden County may decide to amend its approved programs based upon one of the following decisions, which shall be considered a substantial amendment:

- a. To make substantial change in its allocation priorities;

- b. To undertake an activity, using funds from any program covered by the consolidated plan (including program income), which was not previously described in an action plan or funding application;
- c. To decide not to carry out an activity for which funding is approved; or
- d. To change the purpose, scope, location, or beneficiaries of an activity.

In the case of an amendment, Camden County shall provide citizens with reasonable notice of and opportunity to comment on, such proposed changes in its use of funds. The participating community or the Camden County Office of Community Development will publish a notice in the legal section of the papers of general circulation in Camden County of the proposed program change and give interested or affected citizens at least thirty (30) calendar days to submit comments on the amendment. Camden County shall consider any such comments and, if Camden County deems appropriate, modify the amendment.

Exceptions will be made for amendments to the 2019 and 2020 Annual Action Plans related to the CARES Act and Covid-19 response. Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds. This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.

As with the Consolidated Five (5) Year Plan and Annual Action Plan, all amendments will be available for public display in the Community Development Office and the municipal building of the town requesting the change. Limited English speaking persons and persons who are blind or visually disabled may request that information be provided in an alternative format.

- 2. Camden County may decide to make a revision to its approved programs. A revision is defined as a change in the budget for activities of less than twenty five percent (25%) that does not change the scope or beneficiaries. Revisions do not require the thirty (30) day public notice, but must be approved by the Director of Community Development at an advertised public meeting.
- 3. On completion of all amendments and revisions, the Camden County Office of Community Development will make the amendment public and will notify HUD that an amendment has been made. The Camden County Office of Community Development may submit a copy of

each amendment to HUD as it occurs, or at the end of the program year. A letter transmitting such amendment to HUD shall be signed by the Director of Community Development or his/her designee.

E. Annual Performance Report

Camden County is required to file an annual performance report to HUD. The Camden County Office of Community Development will publish a notice of completion of the report in sufficient time to permit citizens to comment on the report prior to its submission to HUD. The notice will appear in newspapers of general circulation in Camden County at least fifteen (15) calendar days prior to the submission of the report and will indicate the locations at which the report will be made available for public review. Camden County will consider any comments or views of citizens

received in writing, or orally at public hearings in preparing a performance report. If required by program regulations, a summary of these comments or views shall be attached to the performance report.

As with the Consolidated Five (5) Year Plan and Annual Action Plan, the CAPER will be available for public display on the County's website and at locations throughout the county. Limited English speaking persons and persons who are blind or visually disabled may request that information be provided in an alternative format.

F. Policy on Acquisition and Relocation

Camden County has adopted a Residential Anti-displacement and Relocation Assistance Plan, which indicates that Camden County will take every measure to minimize the displacement of persons or businesses. To the extent that such relocation activity is necessary, the Camden County Office of Community Development will have responsibility to ensure that requirements are met for notification and provision of relocation assistance in accordance with applicable Federal regulations and guidelines.

G. Use of Plan

Camden County shall follow the *Citizen Participation Plan* for all funding applications and amendments to the approved applications.

This *CPP* may be modified from time to time by Camden County provided such revisions are consistent with Federal and State law, regulations and administrative requirements covering citizen participation. Prior to any modification of the *Citizen Participation Plan*, the Camden County Office of Community Development will publish a notice of modification in sufficient time to permit citizens to comment prior to approval by the Board of Chosen Freeholders for Camden County. The notice shall be published in newspapers of general circulation at least ten (10) calendar days prior to the adoption of the modification by the Board of Chosen Freeholders.

The Citizen Participation Plan will be available for public display on the County's website and at locations throughout the county. Limited English speaking persons and persons who are blind or visually disabled may request that information be provided in an alternative format.

Any questions or comments on this *Citizen Participation Plan* or request for information should be directed to:

Camden County Office of Community Development
Anthony Bianco, Director
520 Market Street, 12th Floor
Camden, NJ, 08103-1375
Telephone: 856-25-5559
Email-anthony.bianco@camdencounty.com
TDD Users may use 7-1-1 (NJ Telecommunications Relay).

