



# Community Development Block Grant Program

## **Citizen Participation Plan**

Board of Commissioners Office  
555 Court Street NE, Suite 5232  
Salem, OR 97301  
(503) 588-5212  
[commissioners@co.marion.or.us](mailto:commissioners@co.marion.or.us)

Approved 8/11/21

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## INTRODUCTION

Marion County receives Community Development Block Grant (CDBG), and HOME Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). The federal resources are administered through the Board of Commissioners Office.

In 1995, HUD combined the CDBG and HOME application cycles, creating the Consolidated Plan process. This process is used to evaluate needs, set priorities, and allocate funds to implement projects using CDBG and HOME resources. As a recipient of these entitlement program funds, the county is required to produce the following documents:

1. **Consolidated Plan (Consolidated Plan):** A five (5) year strategic plan for how funds will be used to meet the housing and community development goals of HUD and the county.
2. **Annual Action Plan (AAP):** A listing of the CDBG and HOME projects that will be completed during the program year. The AAP serves as the county's application for funding that is submitted annually to HUD for approval.
3. **Consolidated Annual Performance and Evaluation Report (CAPER):** A yearly report submitted to HUD that evaluates the use of CDBG and HOME funds.

The county must also adopt a Citizen Participation Plan that sets forth the county's policies and procedures for community outreach and participation related to the CDBG/HOME program. This Citizen Participation Plan has been developed to encourage residents to participate in the development of the Consolidated Plan, CAPER, and any substantial amendments to the Consolidated Plan. The county will take appropriate action to encourage the participation of all of its residents, including minorities and non-English speaking persons, as well as persons with disabilities.

## NATIONAL OBJECTIVES

The primary purpose of these formula grant programs is to assist in providing decent, safe, and sanitary housing; providing a suitable living environment; and expanding economic development opportunities.

Every CDBG-funded activity must meet one of three national objectives:

1. Benefit low- or moderate-income residents as defined by HUD;
2. Prevent or eliminate slums or blight; or
3. Meet an urgent need (i.e. damage caused by a natural disaster).

## COMMUNITY OUTREACH DISTRIBUTION LIST

An electronic distribution email list and the county's [CDBG/HOME webpage](#) shall be the primary methods of notifying interested persons of CDBG and HOME program activities. Interested persons who do not have access to electronic notifications may request to have paper notices mailed via the

U.S. Postal Service. The community outreach distribution list consists of any person requesting to be placed on the email list, including: representatives of government agencies, community planning organizations, Continuum of Care member organizations, public housing developments, and all persons who have submitted project proposals in the last project proposal cycle.

## **DEVELOPMENT OF THE CONSOLIDATED PLAN**

HUD regulation 24 CFR 91.205 to 91.230 requires recipients of CDBG funding to prepare a five-year Consolidated Plan. The Consolidated Plan identifies and prioritizes community development needs, project proposals, and the specific funding requirements of programs. The county must solicit community input for the Consolidated Plan in order to understand and prioritize community needs, and to further explain the planning process.

There are several phases to the planning process:

1. Data collection and tabulation
2. Drafting of plan
3. Public viewing of the plan
4. Editing of plan
5. Submission of the Consolidated Plan to HUD

Input from community stakeholders including residents, non-profit organizations, and members of the business community may be gathered through: surveys, direct consultation with individual groups, and community outreach meetings. Prior to the development of each AAP and Consolidated Plan, the county must conduct a public hearing that encourages the participation of residents, public housing residents, and affordable housing participants. In an effort to maximize community participation, meeting format allows for in-person, call-in, and submitted written testimony. Meetings are advertised to residents, local and regional institutions, agencies, businesses, developers, and community and faith based organizations. Public hearings include:

1. Overview of the amount of assistance received from HUD annually (grants & program income);
2. Information on the development of activities that may be under-taken using these funds, including the estimated amount that will benefit persons of low- and moderate- income;
3. The areas of the county where activities may be undertaken;
4. A description of the projects programs and services that are underway using currently available funds; and
5. Efforts to minimize displacement.

The public will be encouraged to provide feedback on housing and community development needs.

County community development staff will actively participate with the local Continuum of Care and collaborate with the Marion County Housing Authority to directly discuss the needs assessment for each upcoming AAP.

## CONSOLIDATED ANNUAL EVALUATION REPORT (CAPER)

Pursuant to 24 CFR 91.105(a)(2)(i), prior to submitting the Consolidated Annual Evaluation Report to HUD, the county will make available to residents, businesses, public agencies, and other organizations a draft CAPER in order to encourage residents to participate in the development of the performance report. The county will provide a reasonable opportunity for these groups to examine and comment on the draft through the following actions:

1. Publishing a legal notice in English and Spanish in a local newspaper of general circulation, summarizing the contents and purpose of the CAPER, and include a list of the locations where copies of the entire draft may be examined. The notice will also specify the deadline and place to which comments may be submitted. The county will allow for a minimum of a 15-day period for comments to be received.
2. A public hearing will be held prior to submitting the final CAPER report to HUD. The public hearing will follow the same protocol and procedures as those detailed in the PUBLIC HEARINGS section below.
3. A draft of the CAPER report will be posted on the county's [CDBG/HOME webpage](#) in a format that is available to examine and download.
4. Members of the public may provide comment
  - a. **By email** at [commissioners@co.marion.or.us](mailto:commissioners@co.marion.or.us)
  - b. **In person** in the Board of Commissioners Office  
555 Court Street NE, Suite 5232, Salem, OR 97301
  - c. **Via mail** to  
Marion County Board of Commissioners Office  
P.O. Box 14500, Salem, OR 97309

Any person requiring interpreter assistance, an assistive listening device, large print material, or other accommodations must notify the county at least two business days ahead of the scheduled meeting/event, by calling 503-588-5212 for assistance. TTY 503-588-5168.

## CONSULTATION ACROSS MULTIPLE JURISDICTIONS

To strategically align targeted project areas and goals, and leverage funding opportunities, Marion County will regularly provide information on its CDBG/HOME program and projects to the Marion County Housing Authority, Marion County cities, including any city that has not opted in to the county's program, Linn County, and the City of Salem Urban Development Department.

## PUBLIC HEARINGS

1. **Frequency** - The county will hold a minimum of two public hearings annually, at different times during the Consolidated Plan process, to obtain community input on proposed programs and projects. These meetings will coincide with development of the Consolidated Plan, AAP, and

CAPER. A minimum of one public hearing will be held for the development of the Consolidated Plan and AAP, and another for review of the CAPER.

It is anticipated that the draft Consolidated Plan or AAP will be issued on or about the second week of March/April of each year and the plans shall be adopted and submitted to HUD no later than the 15th of May each year.

It is anticipated that the draft CAPER will be issued on or before the 15th of September of each year and the report shall be submitted to HUD no later than the 30th of September of each year.

2. **Location** - Public hearings are generally held in the Senator Hearing Room at the county's main office building, 555 Court St. NE, Salem, OR 97301, during regularly scheduled board sessions; Wednesdays at 9:00 am. Hearings are broadcast on Capital Community Media and through other widely used social media. In-person locations are ADA compliant.

The county may hold local project specific meetings at other locations throughout the county, with neighborhood groups and affected residents on an as needed basis. These meetings will be publicized through direct contact with representatives of the affected project areas, advocacy groups, flyers, on the county's webpage, and through county social media.

3. **Outreach** - Notification of public hearings will be given in accordance with HUD regulations and the State of Oregon Public Meeting Laws. Public hearing notices will be published in English and Spanish.
  - a. Public hearing notices will be published in English and Spanish in a newspaper of general circulation and on the county's CDBG/HOME webpage.
  - b. Surveys in English and Spanish may be distributed to community members in order to collect additional information.
  - c. English and Spanish public notices will be sent to the Continuum of Care to share with its partner organizations and to the Marion County Housing Authority to share with its clients.
  - d. Flyers of the meeting will be sent to the email distribution group for organizations to post the information in their offices and to share with their networks.
4. **Accessibility** - All meeting locations will be handicapped accessible. Meetings will be advertised in English and Spanish. All ads, notices, and flyers will include a TTY phone number and contact information to arrange for special accessibility requirements. Persons with disabilities who need auxiliary aids and services for effective communication, written materials in alternative formats, or reasonable modifications in policies and procedures in order to access the programs and activities, are invited to make their needs known to CDBG staff.

Phone: (503)588-5212

Email: [commissioners@co.marion.or.us](mailto:commissioners@co.marion.or.us)

5. **Information Provided at Public Hearings:**

- a. Amount of assistance received from HUD annually (grants & program income);
- b. Activities that may be undertaken using these funds, including the estimated amount that will benefit persons of low to moderate income;
- c. The areas where activities may be undertaken;
- d. A description of the programs and services that are underway using currently available funds; and efforts to minimize displacement; and
- e. Review of program performance.

The most recently published Consolidated Plan, CAPER, and other relevant documents will be posted on the county's CDBG/HOME webpage and will be available in electronic format, upon request.

## **CONSOLIDATED PLAN AMENDMENTS**

Marion County's Consolidated Plan will be amended when any of the following events occur:

### **Minor Amendments**

A minor amendment shall occur when the budget, scope, or capacity of a funded activity is adjusted by less than 25%. In this case the amendment to the Consolidated Plan will occur through an administrative process. Approval of the change is at the discretion of the Board of Commissioners and involves a determination that all of the following criteria have been met:

1. The proposed change is not substantial;
2. The proposed change is consistent with the intent of the original scope of work;
3. The proposed budget change is reasonable; and
4. Adequate funds are available to finance the proposed change without causing a substantial change to other activities, projects, or programs.

### **Substantial Amendment**

A change shall be considered substantial when the budget, scope, or capacity for a funded activity is adjusted by more than 25% and/or involves actions described below:

1. An activity described in the AAP is cancelled;
2. A new activity not described in the AAP is planned;
3. The location of an activity described in the AAP is changed so that it is located in a different service area than originally described;
4. The beneficiaries of an activity described in the AAP are changed so that the predominant group of beneficiaries is different from those which were described;
5. The purpose or scope of work of an activity described in the AAP are changed in essential, important, or significant ways from those described, as determined by the Board of Commissioners; or

6. The purpose or scope of the activity described in the AAP is changed such that the budget of the project is increased by at least \$25,000 and more than 25% of the original activity budget.

Program income will be allocated consistent with the Annual Action Plan, in compliance with HUD requirements. HUD allows amendments as they occur or at the end of the program year. The county must submit a copy of each amendment to HUD.

The county will hold a public hearing on substantial amendments and will provide notification of the proposed amendment not less than 30 calendar days prior to the public hearing. The public hearing will follow the protocol and procedures detailed in the PUBLIC HEARINGS section above. The notice will summarize the nature of the proposed amendment, the date, time, and location of the public hearing, and procedures for submission of comments.

Within five (5) business days after the public hearing, the county will determine whether to adopt the proposed amendment, adopt a revised version of the amendment, or reject the amendment. The determination will be posted on the county’s CDBG/HOME webpage. If the amendment is adopted, the change will be incorporated into the Consolidated Plan, along with a summary of comments on the amendment and the county’s response to such comments.

**PUBLIC COMMENT**

All public comment received in writing or orally at the public hearings will be considered in preparing the final consolidated plan. A summary of these comments or views shall be attached to the final Consolidated Plan, amendments to the Consolidated Plan, the CAPER, or Citizen Participation Plan and submitted to HUD as appropriate. The county shall respond within 15 days where practical, to all written complaints, grievances, and requests for information about the Consolidated Plan.

The county will publish notification of the availability to review the proposed Consolidated Plan, Consolidated Annual Performance Evaluation Report, and any substantial amendments in English and Spanish in a newspaper of general circulation and on the county’s CDBG/HOME webpage.

<b>ACTIVITY</b>	<b>COMMENT PERIOD</b>
Draft Consolidated Plan	30-day comment period
Draft Annual Action Plan	30-day comment period
Amendments to consolidated plan	30-day comment period

Proposed Consolidated Plan, AAP, CAPER, and Citizen Participation Plan will be available for viewing and comment, for a period of not less than 30 days, at the following locations:

1. Marion County Board of Commissioners Office;
2. On the county’s [CDBG/HOME webpage](#); and
3. By email as requested.



Any person requiring interpreter assistance, an assistive listening device, large print material or other accommodations, may call 503-588-5212 for assistance. TTY 503-588-5168

## ACCESS TO PUBLIC RECORDS

Marion County will publish the Consolidated Plan, related amendments, AAP, and CAPER, as well as the Citizen Participation Plan and other program materials on its [CDBG webpage](#). Upon request, these documents will be made available to the public at the Board of Commissioners Office during regular business hours. Upon request, copies of program documents and reports will be available in a form accessible to persons with disabilities.

## TECHINCAL ASSISTANCE

County CDBG staff will be available during business hours to answer questions and provide technical assistance to residents, public agencies, and other interested parties in developing proposals for funding under any of the programs covered by the Consolidated Plan.

## COMPLAINT PROCESS

County CDBG staff is responsible for responding to complaints from community members regarding the Consolidated Plan, any related amendments, the CAPER, and the Citizen Participation Plan. Complaints may be submitted in writing by mail, email, or in-person. When submitting a complaint, residents must provide a description of the specific activity and/or project, information on the organization responsible for carrying out the activity and/or project, and a statement of the grievance. Complaints may be received by email, mail, phone, or hand delivered.

- Email: [commissioners@co.marion.or.us](mailto:commissioners@co.marion.or.us)
- Phone: (503) 588-5212
- Mail: Marion County Board of Commissioners Office  
CDBG/HOME Program  
P. O. Box 14500, Salem, OR 97309
- In person: Marion County Board of Commissioners Office  
555 Court Street NE, Suite 5232, Salem, OR 97301

The county shall respond within 15 days where practical, to all written complaints, grievances, and requests for information.

A summary of comments or complaints received from the public shall be attached to the final Consolidated Plan, amendment to the Plan, CAPER, or Citizen Participation Plan and submitted to HUD as appropriate.

## CONTACTS AND RESOURCES

**1. Marion County Board of Commissioners Office**

555 Court St. NE, Suite 5232  
Salem, OR 97301  
Phone: (503) 588-5212  
Email: [commissioners@co.marion.or.us](mailto:commissioners@co.marion.or.us)  
<https://www.co.marion.or.us/>

**2. HUD Portland Office**

Green-Wyatt Federal Building 1220 SW 3rd Avenue, Suite 400  
Portland, OR 97204-2825  
Phone: (971) 222-2600  
<https://www.hud.gov/states/oregon>

HUD Community Planning and Development  
[https://www.hud.gov/program\\_offices/comm\\_planning](https://www.hud.gov/program_offices/comm_planning)

**3. Fair Housing Council of Oregon (FHCO)**

A statewide nonprofit civil rights organization whose mission is to eliminate housing discrimination through enforcement and education.

<http://www.fhco.org/index.html>  
506 SW Sixth Avenue, Suite 1111  
Portland OR 97204  
Main office: (503) 223-8197  
Office fax: (503) 223-3396