State of Maryland Citizen Participation Plan

(Adopted December 2024)

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Introduction

Under the guidelines established by the U.S. Department of Housing and Urban Development ("HUD") at *24 CFR § 91.115 - Citizen participation plan; States*, the State of Maryland's Department of Housing and Community Development ("DHCD") has prepared this Citizen Participation Plan ("Plan") to set forth its policies and procedures for citizen participation related to various HUD grants including: the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), HOME Investment Partnerships Program (HOME), Housing Opportunities for Persons with AIDS/HIV (HOPWA), the Housing Trust Fund (HTF), and Recovery Housing Program (RHP). In the event that the proposed policies in this document and in 24 CFR § 91.115 contradict one another, the regulations found at 24 CFR § 91.115 will supersede the standards in this document and inform the minimum requirements of DHCD in fulfilling its citizen participation requirements.

This plan details the scope and applicability of citizen participation as it relates to the following reports and processes associated with the aforementioned HUD grants:

- Five-Year Consolidated Plan
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Citizen Participation Plan
- Substantial Amendments to previously approved plans or reports

Citizen participation will be open to any resident within the State of Maryland, however, to the greatest extent possible, DHCD will especially encourage the participation of the following groups of residents:

- Low-and-moderate income persons, particularly those persons living in areas designated by the State of Maryland as a revitalization area, in a slum and blighted area, and in areas where CDBG funds are proposed to be used;
- Minorities and non-English speaking persons;
- Persons with disabilities;
- Local Continuums of Care;
- Local and regional institutions, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations;
- Residents of public and assisted housing developments (including resident advisory boards, resident councils, and resident management corporations); and,
- Public and private organizations, including broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies.

In order to encourage this participation, DHCD may use a variety of methods to involve residents, to include, but not limited to:

- Focus Groups
- Public Hearings
- Mailings (Digital and Paper)
- Online Surveys
- Newsletters
- Newspaper Advertisements
- Press Releases

In general, the contents of this Citizen Participation Plan and the various HUD formula grant programs focuses on “non-entitlement jurisdictions.” These areas are those that do not receive any direct funding allocations from HUD for any of the formula grant programs previously listed. Any jurisdiction receiving direct funding allocations from HUD is required to administer its own Citizen Participation Plan which may differ from the contents included in this plan. All other areas in the State of Maryland are covered by the contents of this plan.

Administrative Responsibilities and Contact Information

The State of Maryland’s Department of Housing and Community Development (DHCD) is the lead department responsible for the execution of the Citizen Participation Plan and the HUD planning documents referenced in this plan. DHCD, in partnership with the Maryland Department of Health (MDH), is also the lead department responsible for program implementation and the development of applicable grant policies and procedures.

Agency Role	Name	Department/Agency
CDBG Administrator	State of Maryland	DHCD - Neighborhood Revitalization
ESG Administrator	State of Maryland	DHCD - Homeless Solutions
HOME Administrator	State of Maryland	DHCD - CDA
HOPWA Administrator	State of Maryland	MDH
HTF Administrator	State of Maryland	DHCD- CDA

Public Contact Information

Any questions or concerns about the Citizen Participation Plan or the information contained in this document can be directed to the Office of Research and Compliance at DHCD.

Use of Citizen Participation Plan

The State will carry out the Citizen Participation Plan as detailed in the subsequent pages to the fullest extent possible.

The primary goals of the public participation process as administered by DHCD is:

1. To solicit the viewpoints and concerns of the public at large and all groups and constituencies interested in or affected by a HUD formula grant or an associated report/plan;
2. To present information on the status of housing and community development activities in the State and their related target populations;
3. To solicit recommendations on the goals, objectives, and strategies for providing housing and economic development opportunities to Maryland's low income citizens; and,
4. To obtain responses to proposed policy alternatives and priorities for resource allocation.

Overview of Applicable Reports and Processes

The citizen participation process is triggered by a variety of actions related to grant plans or reports. Each plan or report features unique citizen participation requirements. A brief overview of the five plans or reports encompassed in this document is included below.

1. **Five-Year Consolidated Plan**: the strategic framework to identify housing and community development priorities that align and focus funding from HUD formula block grant programs.
2. **Annual Action Plan**: summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified in the Consolidated Plan.
3. **Consolidated Annual Performance and Evaluation Report**: report on the actual accomplishments and progress achieved during a program year towards the goals identified in the Consolidated Plan.
4. **Citizen Participation Plan**: policies and procedures for encouraging citizen participation in response to HUD formula block grant programs.
5. **Substantial Amendments**: changes to a HUD-approved action plan or consolidated plan.

Additional information on these reports and plans is available on the HUD Exchange website.

The following sections of this Citizen Participation Plan will identify the specific citizen participation requirements for each of these reports or plans.

Five-Year Consolidated Plan

The Five-Year Consolidated Plan requires DHCD to clearly identify how it will allocate funding and programmatic intentions to achieve one of the following three primary objectives determined by HUD:

- Creating a suitable living environment;
- Providing decent housing; and,
- Creating economic opportunities.

Prior to the adoption of the Five-Year Consolidated Plan, DHCD will make information available to all residents, public agencies, and other interested parties that includes:

- The amount of assistance DHCD expects to receive (including grant funds and program income) and the estimated amount that will benefit low-and-moderate income persons;
- The range of activities that may be undertaken;
- The timeline for plan submission; and,
- Plans to minimize displacement of persons and to assist any persons displaced, including the types and levels of assistance DHCD will make available to persons displaced, even if DHCD expects no displacement to occur.

DHCD will also make the HUD-provided data and any other supplemental information the State plans to incorporate into the Consolidated Plan available to residents, public agencies, and other interested parties to the greatest extent feasible. The State may make this HUD-provided data available to the public by cross-referencing to the data on HUD's website.

During the development of the Consolidated Plan, a proposed version of the plan will be made available in a manner that affords Maryland residents, public agencies, and other interested parties the opportunity to examine its content and to submit comments. DHCD will publish a summary of the proposed plan in newspapers of general circulation throughout the state (with an emphasis on non-entitlement areas). This summary will describe the contents and purpose of the Consolidated Plan, the amount of money DHCD expects to receive, and a list of locations where copies of the entire proposed document may be viewed. In order to further expand participation in the development of the Consolidated Plan, press releases, social media, and other digital marketing efforts may be utilized.

A copy of the plan in its entirety will be made available on DHCD's website and any interested parties will also be able to request a free copy of the plan by either calling or writing directly to DHCD.

DHCD will also notify citizens or units of general local government, as appropriate, of the availability of the Consolidated Plan as adopted as well as any amendments to the plan.

Public Comment Period

Public comments will be accepted for a minimum of **thirty** days on any draft Consolidated Plan. Comments can be submitted to DHCD through phone calls or written correspondence (e.g. email or physical letter). Citizen feedback received during public hearings will also be treated as a public comment and incorporated into the draft Consolidated Plan as appropriate. A summary of public comments and a summary of any comments not accepted and the reasons why will be attached to the final Consolidated Plan.

Advertisement of the public comment period will follow the process detailed in the previous section.

There may be some instances in which HUD provides waivers or alternative requirements to the regulatory minimum time period for a public comment period. In the event of such a waiver, this new requirement would supersede the process as detailed in this citizen participation plan. DHCD will clearly notate if such a waiver exists in any notification to the public.

Public Hearings

DHCD will hold a minimum of **two** public hearings during the development of its Consolidated Plan. An initial public hearing will be held to obtain the views of residents on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. A second public hearing will be held to review the contents of the proposed Consolidated Plan. Any additional public hearings held will be at the discretion of DHCD and its staff.

All public hearings will be held at a time and location convenient to potential and actual beneficiaries of the proposed funding and include accommodations for persons with disabilities pursuant to section 504 of the Rehabilitation Act of 1973 and the regulations at 24 CFR Part 8; and the Americans with Disabilities Act and the regulations at 28 CFR Parts 35 and 36, as applicable. Prospective public hearings will be scheduled at various times, including both day and evening hours. All hearing locations will be held either at handicap accessible sites or virtually to promote inclusivity for all residents.

A teletypewriter (TTY) phone number will also be placed in all advertisements related to public hearings or public comment periods to allow hearing impaired individuals to request accommodations for attendance at any hearing.

DHCD will strive to accommodate the needs of non-English speaking residents to further encourage their involvement in the Consolidated Plan process. These accommodations may include the hiring of a translator to either attend a public hearing or discuss issues of concerns with a non-English speaking resident. Individuals requiring such accommodations will need to request assistance in advance of the hearing.

In the event of a public health emergency which limits public gatherings, virtual or web-based hearings may be used in lieu of in-person hearings.

Any public hearing will be published using the process detailed in the first section of this topic. The publication of any public hearing will detail the time, date, location, and subject of the hearing with reasonable and advance notice to citizens. DHCD will strive to provide the public with at least **ten** days notice before any hearing.

There may be some instances in which HUD may provide waivers or alternative requirements to the regulations for public hearings. In the event of such a waiver, this new requirement would supersede the process as detailed in this citizen participation plan. DHCD will clearly notate if such a waiver exists in any notification to the public.

Availability of Consolidated Plan to the Public

The State will make available sufficient versions of its adopted and approved Consolidated Plan(s) to cover the preceding five year period from the current date. These documents will be published on DHCD's website in their entirety. Physical copies of the plan may also be provided to interested parties.

DHCD will work with any citizens requiring special accommodations to review a plan in an appropriately accessible format.

Complaints

DHCD will accept any comments or views made on the Consolidated Plan. Written copies of all complaints and comments received during the public comment period will be attached to the Consolidated Plan with appropriate responses made to all questions asked and issues raised. Oral comments received at public hearings will also be presented, responded to, and attached to the final version of the Consolidated Plan.

The State will further provide a timely, substantive written response to every written resident complaint within fifteen working days, where applicable.

Annual Action Plan

The Annual Action Plan is an annual report that details what actions and activities DHCD will undertake in a given program year and the specific federal and non-federal resources that will be used to address the priority needs and specific goals identified by the Consolidated Plan. It is a component of the Five-Year Consolidated Plan when such a plan is submitted to HUD and a separate individual report in the years where a Consolidated Plan is not submitted.

The citizen participation process for the Annual Actual Plan follows the same process described for the Consolidated Plan.

Substantial Amendments to the Consolidated Plan or Annual Action Plan

If the need arises, the State may amend an approved Consolidated Plan or Annual Action Plan to address substantial changes to proposed activities, programs, or funding. The following criteria will be used to determine whether a change is substantial enough to warrant an amendment to a plan:

- Change in Scope: a major change to the purpose or scope of a program that alters the original activity location, eligibility category, or total beneficiaries by 25% of the original estimated count.
- Change in Method of Distribution: a major change in the current method of distributing funds (e.g. a change from a competitive application process to a formula-based allocation).
- Change in Allocation: a change to the allocation of either new or previously designated funding to a program of activity equal to or greater than 51% of the original allocation.
- Change in Regulations: a change to federal program rules or regulations for existing programs which add additional federal requirements (e.g. in response to disaster funding or an economic stimulus package).

Substantial amendments may also be required in the event that HUD or Congress state in legislation that a change in program operations constitutes a substantial amendment to grantee plans.

Public Comment Period

In the event that a substantial enough change exists to trigger an amendment to an existing plan, the State will open a public comment period for a minimum of **thirty** days. This public comment period will be reduced in **fifteen** days if the amendment is related to disaster recovery funding.

There may also be some instances in which HUD provides waivers or alternative requirements to the regulatory minimum time period for a public comment period. In the event of such a waiver, this new requirement would supersede the process as detailed in this citizen participation plan. DHCD will clearly notate if such a waiver exists in any notification to the public.

Notice of the proposed amendment, a summary of its contents, instructions on how to review the amended plan, and the exact time frame for public comment will be published in newspapers of general circulation regionally throughout the State. The exact number of newspapers will be at the discretion of DHCD staff. Any comments received will be reviewed by DHCD staff and incorporated as appropriate. An overview of these comments will also be submitted to HUD along with other documentation demonstrating how the citizen participation process was fulfilled.

Public Hearings

Unless otherwise directed by HUD or Congress, no public hearings will be held for substantial amendments. DHCD staff may, however, elect to hold public hearings in response to feedback on proposed changes or other information related to an amendment. In such an event, the same advertisement process for public hearings as described in the Consolidated Plan section of this document would be followed.

Access to the Substantial Amendment by the Public

The public notice detailing the substantial amendment and a copy of the amended plan will be published on DHCD's website in its entirety for the duration of the public comment period. Once the public comment period has ended and the amendment has been reviewed by HUD, the relevant amended plan will replace any existing versions available on DHCD's website.

DHCD will work with any citizens requiring special accommodations to review an amendment in an appropriately accessible format.

Complaints

DHCD will accept any comments or views made on a substantial amendment. Written copies of all complaints and comments received during the public comment period will be attached to the submitted amendment with appropriate responses made to all questions asked and issues raised. Oral comments received at any public hearings will also be presented, responded to, and attached to the final version of the amendment.

The State will further provide a timely, substantive written response to every written resident complaint within fifteen working days, where applicable.

Consolidated Annual Performance and Evaluation Report (CAPER)

The Consolidated Annual Performance and Evaluation Report discusses the accomplishments and progress towards the identified Consolidated Plan goals during a specific program year.

Public Comment Period

Public comments will be accepted for a minimum of **fifteen** days on any draft performance report. Comments can be submitted to DHCD through phone calls or written correspondence (e.g. email or physical letter). Citizen feedback received during any public hearing will also be treated as a public comment and incorporated into the draft performance report as appropriate. A summary of all public comments and a summary of any comments not accepted and the reasons why will be attached to the final performance report.

DHCD will publish a public notice of the comment period in newspapers of general circulation throughout the state (with an emphasis on non-entitlement areas). This summary will describe the purpose of the CAPER and where copies of the draft document can be viewed. In order to further expand feedback on the performance report, press releases, social media, and other digital marketing efforts may be utilized.

A copy of the performance report in its entirety will be made available on DHCD's website and any interested parties will also be able to request a free copy of the plan by either calling or writing directly to DHCD.

DHCD will also notify citizens or units of general local government, as appropriate.

There may be some instances in which HUD provides waivers or alternative requirements to the regulatory minimum time period for a public comment period. In the event of such a waiver, this new requirement would supersede the process as detailed in this citizen participation plan. DHCD will clearly notate if such a waiver exists in any notification to the public.

Public Hearings

Unless otherwise directed by HUD or Congress, no public hearings will be held for any annual performance reports. DHCD staff may, however, elect to hold public hearings at its discretion. In such an event, the same advertisement process for public hearings as described in the Consolidated Plan section of this document would be followed.

Access to Performance Reports by the Public

The public notice advertising the draft performance report and a draft of the report will be published on DHCD's website in its entirety for the duration of the public comment period. Once the public comment period has ended and the performance report has been reviewed by HUD, the approved performance report will remain on DHCD's website for a minimum of five years.

DHCD will work with any citizens requiring special accommodations to review a performance report in an appropriately accessible format.

Complaints

DHCD will accept any comments or views made on a performance report. Written copies of all complaints and comments received during the public comment period will be attached to the submitted report with appropriate responses made to all questions asked and issues raised. Oral comments received at any public hearings will also be presented, responded to, and attached to the final version of the amendment.

The State will further provide a timely, substantive written response to every written resident complaint within fifteen working days, where applicable.

Adoption or Amendment of Citizen Participation Plan

The State may amend this Citizen Participation Plan for various reasons to ensure its conformity to the regulations outlined by the U.S. Department of Housing and Urban Development.

Public Comment Period

In the event that a change is made to the Citizen Participation Plan, DHCD will open a public comment period for a minimum of **thirty** days. Comments can be submitted to DHCD through phone calls or written correspondence (e.g. email or physical letter). Citizen feedback received during any public hearing will also be treated as a public comment and incorporated into the proposed Citizen Participation Plan as appropriate.

DHCD will publish a public notice of the comment period in newspapers of general circulation throughout the state (with an emphasis on non-entitlement areas). This summary will describe the contents of the amendment and where copies of the draft document can be viewed. In order to further expand feedback on the amended plan, press releases, social media, and other digital marketing efforts may be utilized.

A copy of the proposed amended Citizen Participation Plan in its entirety will be made available on DHCD's website and any interested parties will also be able to request a free copy of the plan by either calling or writing directly to DHCD.

DHCD will also directly notify citizens or units of general local government, as appropriate.

There may be some instances in which HUD provides waivers or alternative requirements to the regulatory minimum time period for a public comment period. In the event of such a waiver, this new requirement would supersede the process as detailed in this citizen participation plan. DHCD will clearly notate if such a waiver exists in any notification to the public.

Public Hearings

Unless otherwise directed by HUD or Congress, no public hearings will be held for any amendments to the Citizen Participation Plan. DHCD staff may, however, elect to hold public hearings at its discretion. In such an event, the same advertisement process for public hearings as described in the Consolidated Plan section of this document would be followed.

Access to the Citizen Participation Plan by the Public

The public notice advertising the draft amended Citizen Participation Plan and a draft of the plan will be published on DHCD's website in its entirety for the duration of the public comment period. Once the public comment period has ended and the amended Citizen Participation Plan has been reviewed by HUD, the approved plan will remain on DHCD's website.

DHCD will work with any citizens requiring special accommodations to review the plan in an appropriately accessible format.

Complaints

DHCD will accept any comments or views made on a Citizen Participation Plan. Written copies of all complaints and comments received during the public comment period will be attached to the submitted plan with appropriate responses made to all questions asked and issues raised. Oral comments received at any public hearings will also be presented, responded to, and attached to the final version of the amendment.

The State will further provide a timely, substantive written response to every written resident complaint within fifteen working days, where applicable.

Local Government Requirements for the CDBG Program

Local governments which receive or apply for funding under the State CDBG program are required to undertake their own citizen participation process for receiving CDBG funding. That process includes:

1. Local government files must contain a written citizen participation plan which describes its methods for providing and encouraging citizen participation, particularly by low and moderate income persons who reside in slum or blighted areas and areas in which CDBG funds are proposed to be used.
2. Notice of a public hearing must be published in a newspaper of general local circulation no less than five days in advance of the hearing. The hearing must be held in conjunction with a regularly scheduled meeting of the elected officials of the jurisdiction. Local government files shall contain documentary evidence that the required notices were published and public hearings were held in accordance with the plan. Copies of the actual notices and/or affidavits shall be a part of the files, in addition to minutes of the hearings.
3. Furnish citizens information including, but not limited to:
    a. The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income).
        1. This information can be provided to citizens through public notice in a newspaper of general circulation, newsletters, community bulletins, flyers, presentations at community meetings, or articles published in local newspapers.
    b. The range of activities that may be undertaken with CDBG funds.
        1. The local government must provide a list of activities that may be undertaken with CDBG funds to any group or any individual who requests one. In addition, the public should be informed of permissible activities for the use of CDBG funds during the public hearing process.
    c. The estimated amount of CDBG funds proposed to be used for activities that will meet the national objective to benefit low and moderate income persons.
        1. The local government will specify the amount of CDBG funds applied for and the activities that will be undertaken to meet the national objective of benefiting low and very low income persons in its application for funds. This application shall be made available to the general public, including placing the document out for review in local government offices and local libraries. In addition, when published notice of public hearing is given in area newspapers on the local government's application for CDBG funds, the local government will provide a short summary of the proposed activities in the published notice, including in that notice how low and moderate income persons are expected to benefit from the use of CDBG funds.

d. The proposed CDBG activities likely to result in displacement and the unit of general local government's anti-displacement and relocation plans required under 24 CFR Part 570.488.
    1. All CDBG grantees are required to adopt a Residential Anti-Displacement and Relocation Plan. This plan should outline what actions would be taken by the jurisdiction in the event that displacement occurs. All grantees are encouraged to avoid activities that result in displacement.
    2. In the event that any displacement is likely to occur as the result of use of the CDBG funds, the local government must make notice of that displacement in its newspaper notices of public hearing, and must advise all affected persons directly through flyers, letters, or other appropriate actions, including site visits for persons who are illiterate or handicapped, of their proposed displacement. Should funds be granted that result in dislocation of residents, the local government must undertake the full range of activities as outlined under the law to help dislocated persons, including assisting persons in locating new housing, paying moving and relocation expenses, and providing rental or any other financial assistance for the full time required by law.
e. Provide technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals in accordance with procedures developed by the State. This assistance need not include providing funds.
    1. When requested to provide technical assistance to groups representative of persons of low and moderate income, a local government shall assist if possible. Files shall document meetings between the groups and the local government. If the local government does not have the staff capacity to assist, they may offer a referral to the State or to a consultant who can provide the necessary expertise.

f. Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views, and responding to proposals and questions. Together the hearings must cover community development and housing needs, development of proposed activities, and a review of program performance. The public hearing to cover community development and housing needs must be held before submission of an application to the State. There must be reasonable notice of the hearings, and they must be held at times and locations convenient to potential or actual beneficiaries. Accommodations must also be made for the handicapped. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate.
    1. The local government must hold one public hearing on housing, economic development, and community development needs and development of proposed activities prior to submission of an application. If funded, a second hearing on program performance must be held at some point during the grant period after the activity has been initiated.
    2. Arrangements will be made for a translator when it is expected that non-English speaking persons will participate. Similarly, a signer must be provided for a hearing-impaired or mute participant.
g. Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the State and, for grants already made, activities which are proposed to be added, deleted, or substantially changed from a local government's application to the State. "Substantially changed" means changes made in terms of purpose, scope, location, or beneficiaries as defined by criteria established by the State.
    1. A substantial change requires that local governments give notice of and opportunity to comment on changes to a proposed project application or actual grant. This can be achieved through public notices describing the change and establishing a comment period or through public hearing.
h. Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within fifteen working days where practicable.
    1. The local government shall provide a current phone number and address to citizens who wish to submit a complaint or grievance. The local government shall make every effort to respond in writing to the complaint or grievance within fifteen working days.

Recovery Housing Program

The U.S. Department of Housing and Urban Development awarded the State funding during Federal Fiscal Year 2019 and 2020 under the Recovery Housing Program (RHP). The purpose of this pilot program was to increase the availability of housing for persons in recovery from substance abuse. As required by the regulations for RHP, the State revised its Citizen Participation Plan that is maintained for the receipt and administration of annual funding received by HUD. *This amendment is specific to RHP and does not change or alter any other information found in the State's Citizen Participation Plan*.

As the goals and activities of RHP are not necessarily those typically funded with formula HUD funds, the program requires consultation with other types of organizations. Those include but are not limited to:

- Maryland Department of Health
- Local Behavioral Health Authorities
- Certified recovery housing providers
- HUD designated Entitlement Counties

Note that the subsequent Action Plan that will be developed specifically for the RHP funds will also seek comments from those organizations and entities that are consulted during the State's Consolidated Plan process.

Recovery Housing Program regulations are found in the Federal Register Notice FR-6225-N-01. The program is based on the statutory and regulatory structure of the Community Development Block Grant program with modifications found in the Federal Register Notice.

Technical Assistance

The State will make available technical assistance to eligible groups representing very low and low income persons (e.g. local governments, community housing development organizations, nonprofit organizations, community groups, and other organizations) that request technical assistance in developing proposals for funding under any of the programs covered by the Consolidated Plan. The scope and type of assistance will be determined by DHCD staff.