GENERAL GUIDELINES

The purpose of this Plan is to encourage citizen participation in Community Development activities. In order to maximize citizen participation and to comply with section 104(a) (3) of the Housing and Community Development Act of 1974 as amended, the Township of Lower Merion adopts the following guidelines:

1. To encourage citizen participation, with particular emphasis on participation by low- and moderate-income persons, particularly those who reside in areas, neighborhoods and communities where funds are proposed to be used, the Township will conduct:
   - Special public meetings to discuss specific projects with affected residents.
   - Notices of special meetings will be advertised in a local newspaper of general circulation, posted on the local Government Access cable channel and on the Township’s website www.lowermerion.org at least ten days in advance of the meeting.
   - Written notice of special meetings will be distributed to affected residents, civic associations and other interested persons.
   - Accommodation for non-English speaking persons as well as persons with disabilities will be made when requested in advance of the meeting.
   - The Township will include in all notices the procedure to follow in requesting accommodation.

2. To provide citizens with reasonable and timely access to local meetings, information and records relating to the Township’s proposed and actual use of funds and accomplishments:
   - Grants and Community Development committee meetings are open to the public and advertised on the local Government Access cable channel, the Township Web site www.lowermerion.org and/or in the Community Calendar of a local newspaper of general circulation.
   - The Township Administration Building is fully accessible to those with disabilities.
   - Special request for accommodations will be coordinated by the Township Secretary.
The following notices are reports that will be published annually:

- The Notice of Funding Availability for Community Development Block Grant funding including the program year schedule, application submission deadline and the review and approval process.

- The proposed Action Plan and projected Use of Funds, including program income and the locations where the plan is available for review. This will include a summary of the consolidated plan and information of upcoming meetings and public hearings as they relate to the development of the action plan.

- The finalized annual Action Plan and Budget.


The following notices and reports will also be published:

- The Five-Year Consolidated Plan

- Notice of Requests for Release of Funds for activities subject to Environmental Review Procedures.

- Notice of the availability of all amendments, additional reports, U.S. Department of Housing and Urban Development (HUD) reviews and notices as required by the regulations.

3. To provide for public hearings to obtain citizens’ views and to respond to proposals and questions at all stages of the Township’s Community Development program, including the development of the Consolidated Plan, Action Plans, and any substantial amendments, the Township proposes:

- The hearings are held after adequate public notice of *not less than ten days* and at times and locations convenient to potential or actual beneficiaries.
- Notification will be by a local newspaper of general circulation and posted on the local Government Access cable channel and the Township’s website.
- The Township will include in all notices the procedure to follow in requesting interpreters for non-English-speaking persons was well as accommodation for persons with disabilities.
- There will be at least two public hearings annually. The first will be in February to obtain the views of citizens on the townships’ housing and community development needs. Any comments or views received in writing or orally at the public hearing will be considered in preparing the Consolidate Plan, annual Action Plans, or substantial amendments.
- The second hearing will be in April and will review the proposed activities, program performance and any comments received at the first public hearing.
The proposed Consolidated Plan, Action Plan or substantial amendment will then be published for comment. There will be a 30-day period to receive comments, which will then be attached to the final versions.

AMENDMENT PROCESS (NEW SECTION)

An amendment may be necessary in the event the Township elects:
- Not to complete an activity contained in the Consolidated Plan;
- To complete an activity other than those described in the Plan;
- To make substantial changes in priorities or distribution of funds; or
- To change the purpose, scope, location, or beneficiaries of an activity;

In this case, the Township will afford affected citizens the opportunity to comment on any substantial changes. The following criteria will be used to determine what change(s) in the Township’s planned or actual activities constitute a “substantial amendment”:

- A national goal changes (under which a project activity was proposed and approved);
- The cost of a proposed activity increases by one-half (50%) or more when activity is actually undertaken;
- The physical location of an activity is changed;
- When a specific location was defined and approved
- When more than one-half (50%) of the locations change under an activity with multiple locations
- The class of beneficiaries change by more than one-half (50%)
- Changes in the use of CDBG funds from one eligible activity to another

Citizens will be provided with reasonable notice and opportunity to comment on proposed amendments. This will be accomplished through notification of a public hearing in the non-legal section of newspapers with general circulation within the Township, and notification on the Township website. These notices will be published at least ten days prior to the hearing.

Citizens will have not less than 30 days to make comments about the amendments prior to any amendment implementation:

1) By attending the Public Hearing
   - In writing
   - Verbally
2) Contacting Office of Housing and Community Development staff
   - In writing, including via the Township website
   - Verbally

A summary of these comments as well as a summary of any comments not accepted and reasons thereof shall be attached to the Consolidated Plan and Amendment(s). The amendment(s) will then be submitted to The U.S. Department of Housing and Urban Development (HUD).
Formal Township approval of the all final plans and any amendments will occur during a regularly scheduled public Board of Commissioners meeting. Notice of such meeting will be published at least ten days prior to such meeting.

In accordance with the 2020 Coronavirus Aid, Relief and Economic Security Act (CARES Act), in emergency circumstances, in-person public hearings are not required. The grantee will make a good faith effort to provide an opportunity for the public to participate using whatever means are available, including electronic communications and virtual meetings. Grantees may meet public hearing requirements with virtual public hearings if: 1) national/local health authorities recommend social distancing and limiting public gatherings for public health reasons; and 2) virtual hearings provide reasonable notification and access for citizens in accordance with the grantee’s certifications, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.

Citizens will be provided with reasonable notice and opportunity to comment on proposed amendments. This will be accomplished through notification of a public hearing in the non-legal section of with general circulation within the Township and notification on the Township newspapers website. These notices will be published at least ten days prior to the hearing. However, in accordance with the Coronavirus Aid, Relief and Economic Security Act (CARES Act), in emergency circumstances, expedited procedures must include at least (5) five days of notice prior to the hearing and reasonable opportunity to comment of no less than (5) five days. The 5-day period can run concurrently for comments on the action plan amendment and amended citizen participation plans. This authority is in effect through the end of the 2020 program year.

TECHNICAL ASSISTANCE
To provide technical assistance to groups and organizations serving low-and moderate-income persons, the Township proposes:

- Community Development staff will be available during normal business hours to provide needed assistance to complete or develop proposals to obtain community development funding. Appointments are required and can be made by contacting the Building & Planning Department, Community Development Division.
- Each Community Development program year scheduled notes the availability of technical assistance.
- The Community Development staff is also available to answer any questions or address any concerns regarding any aspect of the Township’s Community Development program.

PERFORMANCE
To provide reasonable notice and opportunity to comment on the Township’s performance in meeting the goals and objectives of the Community Development program, the Township proposes a period of 15 days to receive comments after publication of the notice of the availability of the CAPER. All comments and views will be considered and attached to the annual performance report.

To provide for an accessible record of citizen participation, the township proposes:

- Including all comments and views, either written or in transcript, as part of the relevant document. This applies to the five-year Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPERs, Environmental Review Reports, Analysis to Impediments of Fair Housing, Section 504 Report and will include all related HUD correspondence.
The final versions of five-year Consolidated Plans, annual Action Plans, amendments and CAPERs will be posted online and available for viewing and copying at various Township Libraries and at the Township Administration Building, 75 East Lancaster Avenue, Ardmore, PA. The documents will be available in the Libraries or the Community Development Division for a minimum of five years.

To respond to citizens complaints related to the Consolidated Plan, amendments and the annual performance report, the Township establishes:

- The Director of the Building & Planning Department’s Community Development Division is designated as the contact person for citizens' complaints.
- A written response will be provided within 15 business days to every written citizen complaint.
- A record of complaints, grievances and responses will be maintained in the Building & Planning Department Community Development division and will be available for viewing and copying during business hours.

GRIEVANCE PROCEDURE

If a complainant feels that the initial response received from the Township is not adequate or unsatisfactory in any way, they may file a grievance with the Township Manager’s Office. The township manager will work to resolve the issue and respond to the complainant within 15 days.