

**ANNE ARUNDEL COUNTY  
MARYLAND  
CITIZEN PARTICIPATION PLAN  
FOR  
COMMUNITY PLANNING  
AND  
DEVELOPMENT PROGRAMS**

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## INTRODUCTION

This Citizen Participation Plan has been prepared in accordance with the U.S. Department of Housing and Urban Development (HUD) regulations 24 CFR Part 91.105, Consolidated Submission for Community Planning and Development Programs, as amended.

The Citizen Participation Plan sets forth Anne Arundel County, Maryland policies and procedures for involving stakeholders and the public throughout all of its planning and policy development processes for programs funded with federal housing and community development funds. It outlines specific efforts made on the part of Anne Arundel County to elicit input from low and moderate income persons, persons with characteristics protected under the Federal Fair Housing Act (herein referred to as protected classes), including ethnic and racial minorities, persons with limited English proficiency (LEP), public housing residents, persons with disabilities, and other special populations who may be eligible to benefit from activities financed in whole or in part using federal HUD funds and/or to benefit from the strategies resulting from the jurisdiction's role in the regional Assessment of Fair Housing /Analysis of Impediments (AFH/AI).

Specifically, this Citizen Participation Plan presents Anne Arundel County's plan for providing for and encouraging interested stakeholders and the public to participate in the development, revision, amendment, adoption, and implementation of the:

- (1) the Consolidated Plan;
- (2) the Assessment of Fair Housing/Analysis of Impediments;
- (3) the Annual Action Plan;
- (4) the Consolidated Annual Performance and Evaluation Report (CAPER); and
- (5) the Section 108 Loan Guarantee Program.

The County will encourage, in consultation with the local public housing agency (the Housing Commission of Anne Arundel County or HCAAC), the participation of residents—including resident advisory boards, resident counsels, and resident management corporations of all public housing communities located within the County—in the process of developing, revising, amending, adopting and implementing the Consolidated Plan. The County also encourages the participation of local and regional institutions, the Continuum of Care (CoC), businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations in the development of the Consolidated Plan.

The County will make every reasonable effort to encourage the participation of persons with limited English proficiency (LEP) and persons with disabilities.

This Plan, dated April 2025, replaces the *Citizen Participation Plan* adopted by the County Council in April 2020 in conjunction with the *Anne Arundel County Consolidated Plan: FY 2021 – FY 2025*. This Plan was updated as part of the *Anne Arundel County Consolidated Plan FY 2025 - 2029*. The Plan will remain in effect until a subsequent plan is approved by the County.

Arundel Community Development Services, Inc. (ACDS), under contract with Anne Arundel County to administer its HOME Investment Partnerships Program (HOME), Community Development Block Grant Program (CDBG), Emergency Solutions Grant Program (ESG), Continuum of Care (CoC) and other housing and community development programs, is the lead agency for developing this Citizen Participation Plan and for ensuring that the Plan is implemented.

## CONSOLIDATED PLAN

The Consolidated Plan is the County's single planning and application submission to HUD for participation in the federal CDBG, HOME, ESG, and other HUD funded housing and community development programs. The Consolidated Plan is intended to be a collaborative process whereby the County, with the input of its residents and stakeholders working in organizations that serve residents, establishes a unified vision for housing and community development actions. ACDS, on behalf of the County, will seek to encourage citizen participation and consultation in the development of the Consolidated Plan in the following ways: (1) stakeholder consultation and outreach; (2) public hearings and community meetings; and (3) opportunity to comment on published drafts plans. These efforts are bolstered by the outreach conducted as part of the five-year regional AFH/AI updates, which typically occur the year before a new five-year Consolidated Plan is due to HUD. This outreach includes resident surveys representing Anne Arundel residents, additional stakeholder consultation, and community meetings.

### Stakeholder Consultation and Outreach

When preparing the Anne Arundel County Consolidated Plan, ACDS on behalf of the County, will consult with a variety of public and private agencies which will include, but not be limited to, the following Community Development Stakeholders:

- a. local public housing authorities operating in the County and the residents of public housing communities;
- b. other assisted housing providers and residents;
- c. social service providers, including those focusing on services to residents of color, families with children, the elderly, persons with disabilities, survivors of or persons experiencing domestic violence, homeless persons and those at risk of homelessness,

persons living with HIV/AIDS and their families, persons with mental illness and/or substance abuse challenges, and LEP residents;

- d. community-based and regionally-based organizations representing protected class members and organizations enforcing fair housing laws, fair housing organizations, and other nonprofit organizations that receive funding under the Fair Housing Initiative Program, and other public and private fair housing service agencies operating within Anne Arundel County;
- e. adjacent units of general local government and local and regional government agencies, including agencies with metropolitan-wide planning and transportation responsibilities;
- f. individuals, community associations and/or organizations based in the low and moderate income communities where federal housing and community development dollars may be of benefit;
- g. broadband internet service providers and organizations engaged in narrowing the digital divide; and
- h. County agencies whose primary responsibilities include the management of flood-prone areas, public land and water resources, and emergency management.

When preparing the portions of the Consolidated Plan describing the County's homeless strategy and the resources available to address the needs of homeless persons and persons at risk of becoming homeless, the County will consult with:

- a. the County's Continuum of Care;
- b. public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families; homeless veterans; youth; and/or other persons with special needs; and
- c. business and civic leaders.

The jurisdiction will consult with State or County health and child welfare agencies, as well as examine existing data related to lead-based paint hazards when preparing the portion of the Consolidated Plan concerning lead-based paint hazards.

The County will consult with adjacent units of local governments and the State of Maryland to the extent practical when preparing the Consolidated Plan.

A variety of methods may be utilized to consult with and receive input from stakeholders. Outreach may include email correspondence, telephone/virtual/in person interviews, mail surveys, internet-based surveys, focus groups, meetings, and/or consultation workshops.

Collectively, all stakeholders will be included in a **Community Development Stakeholders List** maintained by ACDS for outreach purposes regarding the *Anne Arundel County Consolidated Plan* and all other planning documents covered in this Citizen Participation Plan. The list will continually be updated with interested citizens, previous and interested applicants for HUD funding, and organizations who may serve the protected classes or whose membership or clientele may be affected by the Consolidated Plan and/or HUD funded activities. Any organization or person wishing to be added to the Community Development Stakeholders List should submit their name and contact information to ACDS by emailing [info@acdsinc.org](mailto:info@acdsinc.org), by calling (410) 222-7600, or by mailing ACDS at 2666 Riva Road, Suite 210, Annapolis MD 21401.

## **Public Hearings/Notifications**

ACDS, on behalf of the County, will conduct at least three public hearings regarding the development of the Consolidated Plan. The County Council will also hold a public hearing on the Consolidated Plan. One hearing will be held outside of the draft comment period, during development of the Consolidated Plan.

### **First Public Hearing**

The first public hearing for the consolidated planning process may be combined with the Annual Action Plan public hearing and/or final hearings regarding the AFH/AI. This hearing may provide citizens with (i) information about the purpose of the Consolidated Plan; (ii) the County's performance in achieving the Consolidated Plan's goals and strategies as stated in the County's CAPER; (iii) projections of the amount of assistance the County may receive for the next five year period; (iv) a general description of the range of activities which may be undertaken with the federal funds and how those activities may benefit persons of low and moderate income; and (v) a review of the County's AFH/AI. Commentary and discussion concerning community development needs and issues is also solicited from citizens.

### **Second Public Hearing**

The second public hearing will be held to provide citizens with a summary of the housing and community development needs identified from (i) the stakeholder consultation process and the first public hearing; and (ii) a comprehensive review of data gathered from the census and other sources of information. This forum provides the opportunity for citizens to provide input into the Consolidated Plan's draft goals and strategies, as well as to facilitate the prioritization of the County's housing and community development needs, and to help set priorities for investments

### **Third Public Hearing**

The third public hearing may also be held and would be combined with the second Annual Action Plan hearing where staff present budget recommendations. The hearing will provide citizens with a draft of the goals and priorities for investment of the County's federal funds and the opportunity for citizens to provide comments. This hearing will take place during the 30-day public comment period for the draft Consolidated Plan and Annual Action Plan.

### **Notifications**

Notification of public hearings will be published on the ACDS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. Citizens and stakeholders whose names are maintained on the Community Development Stakeholders List will receive written notification of the public hearings either via e-mail or the U.S. Postal Service. All notices will be published and transmitted not less than 14 days prior to the public hearing.

Public hearings will be held at a convenient time for the public in barrier-free facilities, accessible by public transportation. Every effort will be made to accommodate individuals with disabilities and persons with limited English proficiency, including providing an interpreter when a significant number of LEP or hearing-impaired citizens are expected at the public hearing, provided ACDS receives a seven-day notice prior to the public hearing.

### **Special Circumstance**

Public hearings may be held virtually if (1) national/local health authorities recommend social distancing and limiting public gatherings for health reasons or in the event of a natural disaster which renders in person meetings unavailable; (2) the County provides reasonable notice and access is provided to all residents and the County makes allowable questions, issues and responses available to the public; and (3) applicable federal funding regulations and statutes allow for virtual hearings.

### **Draft Consolidated Plan Availability**

A notice describing the purpose of and the availability of the draft Consolidated Plan and locations where copies of the plan can be examined, along with an explanation of the process and timeline for public comment, will be published on the ACDS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. This notice will also be sent to the Community Development Stakeholders List via e-mail or the U.S. Postal Service. A 30-day public notice period will be provided during which time, oral and written comments will be received by ACDS.

An electronic copy of the draft Consolidated Plan will be available on the ACDS website. Citizens without home internet access can access the Plan at local public libraries throughout the County. Printed copies will be available at the office of ACDS. A reasonable number of copies



will be made available free of charge at the request of citizens or community groups. ACDS will make translations of executive summaries and other critical documents available upon request. All comments submitted during the 30-day draft plan comment period will be considered and incorporated into the document as deemed appropriate. Additionally, a summary of all comments received, along with the reasons provided for not incorporating any comments, will be included in the Consolidated Plan.

## **County Council Approval and Submission**

The County Executive will submit the recommended Consolidated Plan to the County Council for review and adoption during the months of April/May. Public comments will be received, recorded, considered, and addressed by the County Council during the period between the Plan's introduction and adoption.

Once the Consolidated Plan has been adopted by the County Council, the Plan will be submitted to HUD. The final Consolidated Plan will be available electronically on the ACDS website and made available in print at the office of ACDS and mailed upon request. Citizens without home internet access can access the Consolidated Plan at local public libraries throughout the County. Residents who are unable to access the draft Consolidated Plan electronically should contact ACDS at 410-222-7600 or [info@acsinc.org](mailto:info@acsinc.org) to make alternate arrangements to view a printed copy.

A notice that the adopted Consolidated Plan is available will be published on the ACDS website. Upon request, the Consolidated Plan and/or an Executive Summary will be made available in a manner and in a form accessible to individuals with disabilities and other special needs, and to persons with LEP, as well as translated upon request or read virtually by an interpreter upon request

## **CONSOLIDATED PLAN AMENDMENTS**

During the five-year term of the Consolidated Plan, it may become necessary to amend the Plan if a substantial change occurs. A substantial change to the Consolidated Plan is defined as a situation where the County finds conditions that dictate a change requiring (i) a reconsideration of the goals identified in the original plan, or (ii) the addition of new goals to address the changed condition or newly identified need. When considering an amendment to the Consolidated Plan, the County must clearly define the conditions causing the change.

## **Draft Amendment Availability**

Notification of the amendment will be published on the ACDS website and in local publications (print and electronic) that will maximize County resources and reach an increased number of County residents. Notifications will also be sent via e-mail or US Postal Service to the Community Development Stakeholders List described above. If an amendment is being considered that would have an impact on a specific population or a specific low and moderate income community, the County will encourage participation in the amendment process by members of that specific population or community.

A 30-day public comment period will be provided before the amendment is submitted to the County Council. All comments submitted during the 30-day draft plan comment period in writing, or presented orally, will be considered and incorporated within the Consolidated Plan amendment where deemed appropriate.

In the event that substantial amendments to the Consolidated Plan are required to address an emerging or critical need as a result of natural disaster or infectious disease, the County may follow an expedited public notice and public comment period. The County may allow for a minimum of five-day public comment period in accordance with all applicable federal funding requirements and laws.

## **County Council Approval and Submission**

The Anne Arundel County Executive will submit the recommended Consolidated Plan amendment to the County Council for review and adoption. Public comments will be received, recorded, considered, and addressed by the County Council.

The Consolidated Plan amendment will be submitted to HUD with a summary of all comments, with reasons provided for those comments not incorporated into the amendment. The adopted Consolidated Plan amendment will be made available electronically and in print wherever the Consolidated Plan is made available. Upon request, the Consolidated Plan amendment will be made available in a manner and in a form accessible to individuals with disabilities and other special needs, and to persons with LEP.

## **ASSESSMENT OF FAIR HOUSING**

The County may be required to conduct an Assessment of Fair Housing/Analysis of Impediments (AFH/AI) to meet HUD requirements, which must include an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals. Consultation and community participation is a required element of developing the AFH/AI. ACDS, on behalf of the County, will seek to

encourage citizen participation and consultation in the development of the AFH/AI in the following ways: (1) stakeholder consultation and outreach; (2) public hearings; and (3) opportunity to comment on published drafts.

## **Stakeholder Consultation and Outreach**

When preparing the AFH/AI, ACDS on behalf of the County, will consult the members of the Community Development Stakeholder List identified herein.

A variety of methods may be utilized to consult with and receive input from stakeholders regarding development of the AFH/AI. Outreach and consultation may include written letters, telephone or personal interviews, mail surveys, internet-based correspondence and surveys, focus groups, meetings and/or consultation workshops.

The County will make available to the public, residents, public agencies and the stakeholders any HUD provided data and other supplemental information the County plans to incorporate into its AFH/AI at the start of the public participation process, or as soon as feasible. This may be accomplished through postings on the ACDS website and the Baltimore Metropolitan Council website, presentations to stakeholder groups and/or at local and regional public meetings.

## **Public Hearings/Notifications**

### **Public Hearings**

ACDS, on behalf of the County, will conduct at least one public hearing regarding the development of the AFH/AI. The public hearing on the AFH/AI may be combined with any other public hearings. The hearing shall provide citizens with (i) information about the purpose of the AFH/AI; (ii) an overview of the data and the AFH/AI findings; and (iii) the proposed strategies and priorities for Affirmatively Furthering Fair Housing. Commentary and discussion will also be solicited from citizens about AFH/AI issues.

Public hearings will be held at a convenient time for the public in barrier-free facilities accessible by public transportation. Every effort will be made to accommodate individuals with disabilities and persons with limited English proficiency, including providing an interpreter when a significant number of LEP or hearing impaired citizens are expected at the public hearing, provided ACDS receives a seven day notice prior to the public hearing.

The public hearing may be held virtually if (1) national/local health authorities recommend social distancing and limiting public gatherings for health reasons or in the event of a natural disaster, which renders in person meetings unavailable; (2) the County provides reasonable notice and access is provided to all residents and the County makes allowable questions, issues

and responses available to the public; and (3) applicable federal funding regulations and statutes allow for virtual hearings.

### **Notifications**

Notification of public hearings will be published on the ACDS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. Citizens and stakeholders whose names are maintained on the Community Development Stakeholders List will receive written notification of the public hearings either via e-mail or the U.S. Postal Service. All notices will be published and transmitted not less than 14 days prior to the public hearing.

### **Draft Plan Availability**

A notice describing the purpose of and the availability of the draft AFH/AI and locations where copies of the plan can be examined, along with an explanation of the process and timeline for public comment, will be published on the ACDS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. This notice will also be sent to the Community Development Stakeholders List via e-mail or the US Postal Service. A 30-day public notice period will be provided, during which time, oral and written comments will be received by ACDS. A link to the electronic copy of the draft AFH/AI will be available on the ACDS website. Citizens without home internet access can access the AFH/AI at local public libraries throughout the County. Residents who are unable to access the draft AFH/AI electronically should contact ACDS at 410-222-7600 to make alternate arrangements. ACDS will make translations of executive summaries and other critical documents available upon request. All comments submitted within the 30 day period will be considered and incorporated into the document where deemed appropriate. Additionally, a summary of all comments received, along with the reasons provided for not incorporating any comments, will be included in the AFH/AI.

### **Approval and Submission**

The final AFH/AI will be submitted to HUD. The final AFH/AI will be made available in print at the office of ACDS and electronically via the ACDS website. Citizens without home internet access can access the AFH/AI at local public libraries throughout the County. A notice that the adopted AFH/AI is available will be published on the ACDS website. Upon request, the AFH/AI and/or an Executive Summary will be made available in a manner and in a form accessible to individuals without access to internet, with disabilities and other special needs, and to persons with Limited English Proficiency.

## **ASSESSMENT OF FAIR HOUSING AMENDMENTS**

During the five-year term of the AFH/AI, it may become necessary to amend the AFH/AI if a material change in circumstances in the jurisdiction that affects the information on which the AFH/AI is based, to the extent that the analysis, the fair housing contributing factors, or the priorities and goals of the AFH/AI no longer reflect the actual circumstances. When considering an amendment to the AFH/AI, the County must clearly define the conditions causing the change.

Notification of the amendment will be published on the ADCS website and in local publications (print and electronic) that will maximize County resources and reach an increased number of County residents. Notifications will also be sent via email or the US Postal Service to the Community Development Stakeholders List included herein. If an amendment is being considered that would have an impact on a specific population or a specific low and moderate income community, the County will encourage participation in the amendment process by members of that specific population or community.

A 30-day public comment period will be provided. All comments submitted within the 30-day period in writing, or presented orally, will be considered and incorporated within the AFH/AI where deemed appropriate.

The AFH/AI amendment will be submitted to HUD with a summary of all comments, with reasons provided for those comments not incorporated into the amendment. Any adopted amendment to the AFH/AI will be made available electronically and in print, wherever the AFH/AI is made available. Upon request, the AFH/AI amendment will be made available in a manner and in a form accessible to individuals with disabilities and other special needs, and to persons with LEP.

## **ANNUAL ACTION PLAN**

Annual Action Plans constitute the implementing element of the five-year HUD-approved Consolidated Plan. Each Annual Action Plan identifies and describes activities, which serve to fulfill the identified goals and strategies in the Consolidated Plan. Anne Arundel County has developed the following process to solicit and encourage citizen participation in the development of the Annual Action Plan. The process, described herein, allows for annual input in the planning for investment of federal CDBG, HOME, ESG, HOPWA and other federal funds awarded to the County for housing and community development activities.

## **Funding Application Process**

Activity Recommendation Forms (Applications) can be used by nonprofit organizations and other legal entities to recommend projects and activities and apply for federal funding. Access to the application form will be made available on the ACDS website. The application form will be sent via e-mail to previously funded entities and to those on the Community Development Stakeholder List. A paper copy of the application form will also be mailed upon request.

Technical assistance will be provided to any organization or individual requesting assistance in preparing their applications. Special efforts will be made in low and moderate income communities to assist those interested—including minorities, LEP persons, special needs populations, and other protected classes—in planning projects and activities and preparing proposals for funding.

There will be a minimum of 30 days between the date the application form is made available to the public and the application form submission date. Submitted copies of the applications will be made available for public review at the ACDS Office during business hours.

## **Public Hearings/Notifications**

### **First Public Hearing**

The first public hearing for the Annual Action Plan process will be held to provide citizens with information including (i) the amount of annual grants and program income for federal housing and community development programs expected to be available during the following program year; (ii) the range of activities which may be undertaken with these funds; and (iii) how those activities may benefit persons of low and moderate income. The County will also seek citizen opinion on local community development and housing needs and priority recommendations to guide the development of the Annual Action Plan and provide the opportunity for public comment on program performance during the previous program year.

### **Second Public Hearing**

ACDS staff will recommend the activities and projects for funding for the upcoming fiscal year to the ACDS Board of Directors at the second public hearing. The public will be invited to comment on these recommendations. The ACDS Board of Directors will then approve a final budget based on ACDS staff recommendations and the public's input. The activities and projects recommended for funding will be identified and described in the draft Annual Action Plan.

### **Special Circumstance**

Action Plan public hearings may be held virtually if (1) national/local health authorities recommend social distancing and limiting public gatherings for health reasons or in the event of a natural disaster which renders in person meetings unavailable; (2) the County provides

reasonable notice and access is provided to all residents and the County makes allowable questions, issues and responses available to the public; and (3) applicable federal funding regulations and statutes allow for virtual hearings.

### **Notifications**

Notification of public hearings and availability of applications will be published on the ADCS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. This notice will also be sent via e-mail or the US Postal Service to the Community Development Stakeholders List. This notification will be published and sent not less than 14 days. Information about all public hearings will also be available on the ACDS website.

Public hearings will be held at a convenient time for the public in barrier-free facilities accessible by public transportation. Every effort will be made to accommodate individuals with disabilities and persons with LEP, including providing an interpreter when a significant number of LEP or hearing-impaired citizens are expected at the public hearing, provided ACDS receive a seven-day prior notice.

### **Draft Action Plan Availability**

A notice describing the purpose of and the availability of the draft Action Plan and locations where copies of the plan can be examined, and the process and timeline for public comment, will be published on the ADCS website and in local publications (print and electronic) which maximize County resources and reach an increased number of County residents. This notice will also be sent via e-mail or the U.S. Postal Service to the Community Development Stakeholders List.

A 30-day public notice period will be provided during which time oral and written comments will be received by ACDS. An electronic copy of the full draft Action Plan will be available on the ACDS website. Citizens without internet access can access the Action Plan at local public libraries throughout the County. Printed copies will be available at the office of ACDS or by calling ACDS to make alternative arrangements for a printed copy. A reasonable number of copies will be made available free of charge at the request of citizens or community groups. ACDS will make translations of executive summaries and other critical documents available upon request for persons with disabilities and Limited English Proficiency.

All comments submitted within the 30-day period will be considered and incorporated into the document as deemed appropriate. Additionally, a summary of all written or oral comments received, along with the reasons provided for not incorporating any comments, will be included in the Action Plan.



## **County Council Approval and Submission**

The County Executive will submit the budget recommendations to the County Council for their review and adoption during the month of May. Comments will be received, recorded, considered, and addressed by the County Council. The County Council will then approve the budget, which will then be incorporated into the Annual Action Plan.

The final Action Plan will be submitted to HUD and made available electronically on the ACDS website. Citizens without home internet access can access the Action Plan at local public libraries throughout the County. Residents who are unable to access the Action Plan electronically should contact ACDS at 410-222-7600 to arrange for printed copies. Upon request, the Action Plan and/or an Executive Summary will be made available in a manner and in a form accessible to individuals with disabilities and other special needs, and to persons with LEP.

## **ANNUAL ACTION PLAN AMENDMENTS**

During the course of implementing the Annual Action Plan, it may become necessary to amend the Action Plan based on changes that occur. Should a change be defined as substantial, as described herein, the County will notify the public of the proposed amendment taking into consideration comments received on the proposed amendment before making the amendment final.

A change is considered substantial when it involves: (i) an addition of an activity not previously funded or described in the Action Plan; (ii) a deletion of an activity previously funded and described in the Plan; (iii) a change in an approved activity effecting the purpose, location, or intended beneficiaries; or (iv) an increase or decrease in the original project budget, activity or program by 50 percent or more.

The County will attempt to consolidate the amendment process and include all amendments as an appendix in the Annual Action Plan in order for the public to see all of the budgetary proposals at one time. The public is notified about this process during the Annual Action Plan public participation process. The County will continue to follow this process when conditions allow. If the County needs to amend the Action Plan at other times during the year, it will follow the public process outlined as follows.

Notification of the amendment will be published on the ACDS website and in local publications (print and electronic) which will maximize County resources and reach an increased number of County residents. Notifications will also be sent via e-mail or U.S. Postal Service to the Community Development Stakeholders List. All comments submitted within the 30-day period



in writing, or presented orally, will be considered and incorporated within the Action Plan amendment where deemed appropriate.

In the event that substantial amendments to the Action Plan are required to address an emerging or critical need as a result of natural disaster or infectious disease, the County may follow an expedited public notice and public comment period. The County may allow for a not less than five-day public comment period in accordance with all applicable federal funding requirements and laws.

The Action Plan amendment will be submitted to HUD with a summary of all comments, with reasons provided for those comments not incorporated into the amendment. The Action Plan amendment will be made available electronically on the ACDS website. Upon request, the Action Plan amendment will be made available in a manner and in a form accessible to persons who do not have access to the internet, individuals with disabilities and other special needs, and to persons with LEP.

## **SECTION 108 LOAN GUARANTEE PROGRAM**

The Section 108 Loan Guarantee Program is a loan guarantee program, which enables recipients to borrow up to five times the amount of their annual CDBG grant. Recipients or entitlement communities then pledge their future CDBG funds as security for the loan while HUD acts as the guarantor of the Section 108 loan. According to federal regulations at 24 CFR 570.704, the entitlement community must develop and follow a detailed citizen participation plan and make the plan public before the application is submitted to HUD.

Anne Arundel County has developed the process described herein to solicit and encourage citizen participation in the development of a Section 108 Loan Guarantee Program application, as well as for any subsequent amendments to its application. The County will organize its public participation process around two public hearings.

### **Public Hearing/Notifications**

#### **First Public Hearing**

The first public hearing for the loan guarantee process, which may be combined with the Consolidated Plan and/or Annual Action Plan public hearing, will convene to provide citizens with information including (i) the amount of guaranteed loan funds expected to be made available; (ii) the type of activities that can be undertaken with guaranteed loan funds; (iii) the estimated amount of guaranteed loan funds proposed to be used for activities benefitting low and moderate income persons; and (iv) any proposed activities likely to result in displacement. Comments and questions will be solicited from the hearing attendees as well as anyone who received notice of the hearing.

### **Second Public Hearing**

The second public hearing, which may also be combined with the Consolidated Plan and/or Annual Action Plan hearing, will convene to provide citizens with a summary of the Section 108 loan guarantee application which will have been submitted or will be submitted to HUD for their review and approval.

### **Notification**

Notification of public hearings will be published on the ADCS website and in local publications (print and electronic) which will maximize County resources and reach an increased number of County residents. This notification will be published not less than 14 days prior to the public hearing. Written notification of public hearings will also be mailed to the Community Development Stakeholder List via e-mail or U.S. Postal Service between 10 and 30 days prior to the public hearing. The Community Development Stakeholder List includes organizations whose membership or clientele may be affected by the Consolidated Plan and/or other HUD funded activities. These include interested citizens, previous applicants and recipients of federal funds, representatives of community organizations, County agencies and service providers who serve low and moderate income persons, elderly and special needs populations, and public housing community residents and property managers. Information about the public hearings will also be available on the ACDS website.

The public hearings will be held at a convenient time for the public in barrier-free facilities that are accessible by public transportation. Every effort will be made to accommodate individuals with disabilities including providing an interpreter when a significant number of LEP or hearing-impaired citizens are expected at the public hearing, provided ACDS receives a seven day prior notice.

### **Approval and Submission**

Upon completion of the second public hearing, the public will be notified, via the ADCS website and in local publications (print and electronic), of the availability of the Section 108 Loan Guarantee Program application. A reasonable number of copies will be made available free of charge at the request of citizens or groups. Copies will be available to the public for review at the office of ACDS and on the ACDS website or in an alternate manner upon request.

## **SECTION 108 LOAN GUARANTEE PROGRAM AMENDMENTS**

The regulations governing the CDBG Section 108 Loan Guarantee Program at 24 CFR 570.704(c)(5) require the County to officially amend its application to HUD should the County wish to carry out an activity not previously described in its application. In addition, the regulations further require the County to amend its application should it substantially change

the purpose, scope, location or beneficiaries of an activity. The amendment process for a Section 108 Loan Guarantee requires the County to notify the public and HUD of the proposed amendment.

The County will attempt to consolidate all its amendment processes and include all of its amendments and any applicable Section 108 amendments as an appendix in the Annual Action Plan in order for the public to see all of the proposed budgetary transactions at one time. If the amendment needs to be processed at another time during the year, the County will notify the public about the proposed amendment in local publications (print and electronic) which will maximize County resources and reach an increased number of County residents. Notifications will also be sent via e-mail or US Postal Service to the Community Development Stakeholders List and posted on the ACDS website. The public will be given 30 days to comment. All comments will be considered and incorporated into the document as deemed appropriate before the final amendment is submitted to HUD.

## **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**

The Consolidated Annual Performance and Evaluation Report (CAPER) provides an assessment of actions and accomplishments by Anne Arundel County in the use of its annual entitlements and other federal funds during the prior fiscal year ending June 30. The CAPER is required to be submitted to HUD 90 days after the end of the program year, which for Anne Arundel County is on or about September 30<sup>th</sup>. In developing the CAPER, opportunity for public involvement will be provided through solicitation of public review and comments.

## **Draft CAPER Availability**

Notification of the availability of the draft CAPER will be published on the ADCS website and in local publications (print and electronic), that will maximize County resources and reach an increased number of County residents. The draft CAPER will be made available for public review on the ACDS website. Citizens without internet access can access the CAPER at the local public libraries throughout the County. Residents who are unable to access the draft CAPER electronically should contact ACDS at 410-222-7600 or [info@acsinc.org](mailto:info@acsinc.org) to make alternate arrangements to view a printed copy. Additionally, notification will be sent via e-mail or US Postal Service to the Community Development Stakeholders List which includes interested citizens, previous applicants and recipients of federal housing and community development funds, representatives of community organizations, County agencies, and service providers who serve low and moderate income persons, elderly and special needs populations, and public housing community residents and property managers.

A 15-day period will be provided, during which time oral and written comments will be received by ACDS. Written comments received during this period will be recorded and evaluated, with results incorporated as appropriate into the final CAPER. A summary of all comments received, along with a reason for incorporating or not incorporating the comments, will be included in the final CAPER submitted to HUD.

## **ANTI-DISPLACEMENT & RELOCATION PLAN**

The County will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and will implement the regulations at 49 CFR Part 42.

In addition, the County has and is following a Residential Anti-Displacement and Relocation Assistance Plan required under Section 104(d) of the Housing and Community Development Act of 1974 and in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, in conjunction with any activity assisted with County entitlement funds.

## **ACCESS TO RECORDS**

Reasonable and timely access to records relating to the Consolidated Plan, the Assessment of Fair Housing/Analysis of Impediments, the Annual Action Plan, a Section 108 Loan Guarantee Program application and the CAPER will be provided to citizens, public agencies, and other interested parties upon request as appropriate. Such requests should be submitted in writing and addressed to the Executive Director, Arundel Community Development Services, Inc., 2666

Riva Road, Suite 210, Annapolis, MD 21401. Records will be made available during normal office hours of 8:30 a.m. to 5:00 p.m., Monday through Friday.

## COMPLAINT PROCEDURES

In the event a citizen has questions or complaints concerning the citizen participation process or the administration of federal housing and community development programs, the citizen should submit the questions or complaints in writing to:

Chief Executive Officer  
Arundel Community Development Services, Inc.  
2666 Riva Road, Suite 210  
Annapolis, MD 21401

ACDS shall respond to any written complaint within 30 days of receipt. A citizen, who is dissatisfied with the response by ACDS, may submit a written appeal within 30 days of the response from ACDS to:

Office of Chief Administrative Officer  
Anne Arundel County  
44 Calvert Street, Fourth Floor  
Annapolis, MD 21401

If the citizen is still dissatisfied with the response, the citizen may submit a written request within 30 days of the response from the County for review to:

U.S. Department of Housing and Urban Development  
Maryland State Office  
10 South Howard Street, 5<sup>th</sup> Floor  
Baltimore, MD 21201-2528

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Approved by Christine Anderson  
Chief Administrative Officer

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Date