

**Loudoun County Citizen Participation Plan
For the CDBG Program**



**Adopted by the Board of Supervisors
September 14, 2022**

**Department of Housing & Community Development
Loudoun County, Virginia**



CITIZEN PARTICIPATION PLAN LOUDOUN COUNTY, VIRGINIA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

SECTION I – GENERAL:

This Citizen Participation Plan is prepared in compliance with 24 CFR Part 91.105, *Citizen Participation Plan, Local Governments*. This Citizen Participation Plan sets forth Loudoun County's policies and procedures for citizen participation by encouraging citizens to participate in the development of the County's Five-Year Consolidated Plan and Annual Action Plans, any amendments to these plans, applications for Section 108 Loan Guarantees, and the Consolidated Annual Performance and Evaluation Report (CAPER) and all other programs, as applicable.

SECTION II – STANDARDS OF PARTICIPATION & GOALS FOR PARTICIPATION:

The Standards of Participation and Goals for Citizen Participation in Loudoun County, Virginia, are as follows:

- A.** All aspects of the Community Development Block Grant (CDBG) Program and all other programs, as applicable, shall be conducted in an open manner with freedom of access for all interested persons, groups and/or organizations.
- B.** Provide for and encourage citizen participation from all sectors of the community. To the greatest extent possible, there shall be involvement of: (1) low- and moderate-income persons, especially those living in slum and blighted areas; (2) people living in areas where CDBG funds are proposed to be used; (3) residents of predominantly low- and moderate-income neighborhoods; (4) members of minority groups; (5) residents of neighborhood revitalization strategy areas (NRSAs); (6) the elderly; (7) persons with disabilities; and (8) all persons directly or indirectly impacted or affected by the Community Development Block Grant Program, and Section 108 Loan Guarantee Program and/or all other programs, as applicable.
- C.** Public Hearings shall be held in areas accessible to all sectors of the community, particularly low- and moderate-income individuals¹ and individuals and other interested parties mentioned in B above. In addition, Loudoun County's CDBG Program Manager will speak to any group about

¹ Low-and-moderate income defined at 24 CFR 570.3



the County's Community Development Block Grant Program, its past performance and its proposed or future activities.

- D. There shall be, to the greatest extent possible, and throughout all stages of planning and development of the CDBG Program, Section 108 Loan Guarantee Program, and all other programs, as applicable, a continuity of participation by citizen representatives.
- E. Residents shall be provided, to the greatest extent possible, with timely and adequate information for the purpose of meaningful input into the CDBG Program and Section 108 Loan Guarantee Program and all other programs, as applicable.
- F. Low- and moderate-income persons, residents of slum and blighted neighborhoods, residents of predominantly low- and moderate-income neighborhoods; members of minority groups; residents of NRSAs; the elderly; persons with disabilities; and all persons directly or indirectly impacted or affected by the Community Development Block Grant Program and Section 108 Loan Guarantee Program and all other programs, as applicable, shall be encouraged to submit their views and proposals regarding these programs.
- G. Advisory groups that may be established to exclusively advise and provide input into the CDBG program shall have an adequate representation of low- and moderate-income persons, members of minority groups, and persons directly affected by the CDBG program activities.
- H. Consultation and coordination among the Loudoun County Department of Housing & Community Development, the participants of Section 8 assisted housing and other affordable housing developments, and residents of areas within which developments are proposed during the process of developing and implementing the Five-Year Consolidated Plan and One Year Annual Action Plans.
- I. The Loudoun County Department of Housing & Community Development will ensure that consolidated plan activities related to the County's Housing Choice Voucher (Section 8) Program are coordinated with the Department's Housing Choice Voucher Program.

SECTION III – SCOPE OF PARTICIPATION:

A. Application Development:

Prior to the submission of the Five-Year Consolidated Plan, Annual Action Plan, any application for CDBG funds, application for Section 108 Loan Guarantee funds, and any other funds, as applicable, and prior to the



submission of an application amendment, Loudoun County, in addition to meeting the minimum requirements, shall provide the following for public comment:

1. application requirements;
2. eligibility of project activities;
3. timetable for submission;
4. funding amounts of CDBG funds and CDBG program income;
5. range of activities that may be undertaken with available funds;
6. estimated amount of benefit to persons of low- and moderate income; and
7. any other information necessary to involve citizens in the development of plans and applications

Information provided to the public will be in conformance with Section II above. Furthermore, prior to the development of an annual application for CDBG funds, the progress of the County's Community Development Block Grant Program will be made available to the public at meetings, public hearings and through the local news media.

B. Program Implementation:

Resident involvement may take the form of advisory committees, direct involvement, self-help efforts or other types of citizen participation during program implementation. The Consolidated Annual Performance and Evaluation Report (CAPER) of Loudoun County will be submitted to the Board of Supervisors and then made available to the general public for the purpose of reviewing the accomplishments of the County's CDBG and other programs, as applicable.

The roles that residents of the area will play in the implementation of the CDBG program are as follows:

1. "direct involvement and self-help" in project development and implementation
2. "continued advisory role" via call-ins, write-ins, and group meetings with organized and recognized groups.

C. Monitoring Evaluation:

Opportunities for residents to monitor and evaluate the CDBG program shall be consistent and continuous. Methods available to further these objectives are as follows:

1. direct contact with staff



2. direct contact between staff and groups
3. direct contact between residents and the board of Supervisors

D. Submission of Views and Proposals:

The submission of views and proposals from low- and moderate-income persons, minority groups, and any other persons or organized groups can be on a continuous basis and shall be encouraged to the greatest extent possible. Submissions can be in the form of:

1. personal contact;
2. mail, email, and telephone contact;
3. petitions;
4. attendance at public meetings/hearings;
5. through questionnaires and surveys; and
6. other available means

The submission of views and proposals shall be an on-going process and at a minimum during the following stages:

1. the planning process
2. the annual HUD application process
3. the implementation process

Responses to all submissions shall be in a timely fashion and shall not exceed a period of fifteen (15) days after the voicing of a comment, or the date of receipt of a written comment or inquiry.

Individuals submitting comments by mail should use the following mailing address:

Loudoun County Department of
Housing & Community Development
PO Box 7000
Leesburg, VA, 20177

Comments can also be submitted via email to housing@loudoun.gov

E. Complaints:

All complaints regarding any aspect of the Community Development Block Grant Program, Section 108 Loan Guarantee Program, and all other programs, as applicable, shall be provided in a timely manner and a written response will be provided within fifteen (15) working days after the



voicing of a complaint or the date that the written comment was received by the County.

F. Technical Assistance:

The CDBG Program Manager of Loudoun County shall provide technical assistance to groups/organizations which are representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the County's Consolidated Plan. This assistance may be provided as pre-application meetings to ensure potential projects are eligible for CDBG funding.

G. Adequate Information:

The County shall provide full public access to the CDBG program information and affirmative efforts to provide adequate information to residents, especially those who are low- and moderate-income, and those who are residing in predominantly low- and moderate-income neighborhoods or slum and blighted neighborhoods. Information shall be provided on the Community Development Block Grant Program, Section 108 Loan Guarantee Program, and all other programs, as applicable, including at a minimum the following:

1. At the time when the County begins its Community Development Block Grant Program, Section 108 Loan planning process, and any other programs, as applicable, including:
 - a. total amount of funds available, including program income;
 - b. the range of activities that are eligible or ineligible, including the estimated amount that will benefit persons who are low- and moderate-income;
 - c. plans to minimize displacement and to assist any persons displaced, specifying the types and levels of assistance the County will make available to persons displaced, even if the County anticipates no displacement. The Five-Year Consolidated Plan must state when and how the County will make this information available;
 - d. the process that will be followed in developing and approving the projects or programs;
 - e. the standards of participation and goals of the Citizen Participation Program; and
 - f. summary of important program requirements
2. Upon request, copies of all materials relating to the Community Development Block Grant Program and all other programs, as



applicable, will be made available to any person and/or group for the cost of copying only, particularly documentation concerning the following:

- a. all mailing, promotional material and news releases;
- b. key documents, including all prior applications, letters of approval, performance and program evaluation reports, and any other applications, proposed or approved, or reports required by HUD;
- c. copies of the CDBG regulations;
- d. information on contracting and purchasing procedures, environmental policies, fair housing, equal opportunity, relocation provisions, the 24 CFR Part 58 environmental review process, affirmative action and any other requirements or regulations relating to the CDBG program; and
- e. cost of copying will be as established by local and state laws.

H. Public Hearings/Meetings:

All meetings shall be held in a timely fashion and shall be accessible to all segments of the County's population including accommodations for persons with disabilities. These meetings shall be held at a time and place that is convenient and accessible to potential or actual beneficiaries.

1. Public hearings shall be held on a continuous basis, at least two (2) times per year at different stages of the program year for the purpose of obtaining residents views on the development of needs, the review of proposed activities, and review of program performance. At least one (1) public hearing must be held during the planning process in the development of the plans and before the development of the proposed Five-Year Consolidated Plan, Annual Action Plan, Section 108 Loan Guarantee Application and all other program applications, as applicable, are published for comments.
2. This public hearing during the planning process will include citizen input on housing, homelessness, community development, and public service needs to be provided by nonprofit and local government organizations. It will be held before the Loudoun County Housing Advisory Board. The Housing Advisory Board is composed of members appointed by the Board of Supervisors.
3. Public hearing notices shall be published at least ten (10) calendar days prior to the hearing date and shall be advertised in the local newspaper of general circulation in the area.



4. Board meetings will occur at regularly scheduled intervals. The Board of Supervisors will approve all Annual Action Plans, Consolidated Plans, CAPERs, Substantial Amendments, etc. at board meetings. Public notice is not required prior to every board meeting, except Board public hearings; however, board meetings approving plans will occur following both public hearings and the comment periods.
5. A schedule of the regularly held Public Hearings and Board Meetings are available on the County's website at <https://www.loudoun.gov/4853/About-Board-of-Supervisors-Meetings>.
6. Public Hearings will be held at times and locations convenient to potential and actual beneficiaries of the programs funded. Public Hearings will be held at:
 - a. Loudoun County Housing Advisory Board
 - b. Department of Housing & Community Development
106 Catoctin Circle, SE
Leesburg, VA 20175
 - c. Board of Supervisors
1 Harrison Street, SE
Leesburg, VA 20175

I. Public Notice:

1. A notice will be published in the local newspaper of general circulation in the County that the proposed Five-Year Consolidated Plan and Annual Action Plans will be on public display for a period of not less than thirty (30) days in order to receive citizen comments prior to approval by the governing body.
2. Copies of the proposed plans will be available at the following:
 - a. Department of Housing & Community Development
106 Catoctin Circle, SE
Leesburg, VA 20175
 - b. Information Desk of County Government Center
1 Harrison Street, SE
Leesburg, VA 20175
 - c. Information Desk at all branches of the Loudoun County Public Library System
 - d. On the website at <https://www.loudoun.gov/1674/Community-Development-Block-Grant>



3. Included in the Plans will be an Executive Summary of the proposed plan which describes the contents, purpose, and a list of the locations where copies of the entire proposed Five-Year Consolidated Plan and Annual Action Plans may be examined. In addition, a reasonable number of free copies of these Plans will be made available to citizens or groups that request it.
4. Loudoun County will consider any comments or views of citizens received in writing or orally at the public meetings/hearings in preparing the final Five-Year Consolidated Plan and Annual Action Plans. A summary of all comments, including those comments not accepted and the reason, therefore, shall be attached to the final Five-Year Consolidated Plan and Annual Action Plans.
5. Final copies of the Five-Year Consolidated Plan and Annual Action Plans will be available for public inspection at the following locations:
 - a. Department of Housing & Community Development
106 Catoctin Circle, SE
Leesburg, VA 20175
 - b. Information Desk of County Government Center
1 Harrison Street, SE
Leesburg, VA 20175
 - c. Information Desk at all branches of the Loudoun County Public Library System
 - d. On the website at <https://www.loudoun.gov/1674/Community-Development-Block-Grant>
6. The CDBG Program Manager will electronically provide notices for public meetings/hearings to all County departments, County Board of Supervisors, libraries, partner organizations, and will be posted at the County Government Center and in the Department of Housing & Community Development.
7. Public notices will include contact information to the CDBG Program Manager Office for persons with disabilities and limited English proficiency to seek accommodations. Individuals requiring accommodations should contact the CDBG Program Manager Office at least three (3) days prior for the necessary accommodations to be made.

J. Environmental Review Records:

Federally funded activities under programs such as, the Community Development Block Grant (CDBG) and Section 108 Loan Guarantee Programs, require the completion of Environmental Review Records



before the activity may proceed. Following completion of an environmental assessment, the County will publish a Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOI/RROF).

Following the publication of a Combined notice of the FONSI and RROF, the County will allow a fifteen (15) day comment period, as required by 24 CFR Part 58.43 and 45. The County will consider all comments regarding the FONSI and RROF, submitted by citizens in accordance with this plan. All notices will include contact information for residents to submit comments electronically or by mail.

K. Continuing Activities:

All continuing activities shall be subject to the resident participation process as herein outlined.

L. Copies of Substantial Amendments to the Five-Year Consolidated Plan, Annual Action Plans and Consolidated Annual Performance Evaluation Reports:

Copies of the above will be available for reading upon request at the offices of Loudoun County's CDBG Program Manager, all branches of the Loudoun County Public Library System, and via the website at <https://www.loudoun.gov/1674/Community-Development-Block-Grant>.

M. Access to Records:

The County shall provide full and timely disclosures of its program records. Additionally, all public and non-private records and documentation concerning the Community Development Block Grant Program and all other applicable programs shall be made available by appointment during the hours of 9:00 AM to 4:00 PM, Monday through Friday. Personnel records, and the personal financial records of program participants/applicants, are not available for public inspection.

Electronic copies of current Annual Action Plans, Consolidated Plans, and CAPERs will be kept on the County's website at <https://www.loudoun.gov/1674/Community-Development-Block-Grant>.

N. Substantial Amendments to the Five-Year Consolidated Plan and Annual Action Plans:

1. Definition:

A substantial amendment to the Five-Year Consolidated Plan and Annual Action Plans is:



- a. A change in the allocation of priorities, National Objectives, activities, or a change in the method of distribution of funds;
- b. A proposal to undertake a new activity, using funds from any program covered by the Five-Year Consolidated Plan (including program income received from previous year's funds), and not previously described in the Annual Action Plan;
- c. A change in the purpose, scope, location or beneficiaries of a previously approved activity;
- d. The use of Program Income that was not previously allocated to an eligible activity, based on the following criteria;
- e. Deletion or elimination of a previously approved activity;
- f. A change of 50% or more of the line-item amount within an approved activity, either increased or decreased; or
- g. The use of contingency or unprogrammed funds.

2. Criteria:

The criteria used to determine what constitutes an amendment are based on the following:

- a. **Purpose** - the original purpose for which the activity was selected has changed, including the category of the National Objective selected.
- b. **Scope** – the size or scope of work of the project activity has increased or decreased which changes the cost of the activity by more than 50% of the total original budgeted dollar amount for that activity.
- c. **Location** - the location of the project activity is different from that originally proposed, or the size of the project service area has increased or decreased by 25% in size, or the location of the activity had to be relocated to another area.
- d. **Beneficiaries** - the number of beneficiaries has been reduced by 25% or more, and/or the activity no longer serves at least 51% low- and moderate-income persons.
- e. **Cost** – the total cost of the activity has increased or decreased by 50% or more than the original budget amount.
- f. **New Activity** – a new activity is proposed which was not previously approved.



- g. **Deleted or Canceled Activity** – a previously approved activity is proposed to be deleted/canceled from the approved plan.

If any one of the above criteria applies, then a substantial amendment to a project activity has occurred.

3. Procedure:

A description of the substantial amendment to the Five-Year Consolidated Plan or the Annual Action Plan will be published in the local newspaper of general circulation. A period of no less than thirty (30) days will be provided to receive citizen comments prior to the approval of the amendment. The date, time, and place of the public meeting/hearing shall be listed.

- a. The County will consider any comments or views of citizens received in writing or orally at the public hearings, in preparing the substantial amendment of the Five-Year Consolidated Plan or Annual Action Plans. A summary of any comments or views, as well as a summary of any comments or views not accepted and reasons, therefore, shall be attached to the substantial amendment of the Five-Year Consolidated Plan and Annual Action Plan.
- b. The substantial amendment will be presented to Loudoun County's Board of Supervisors after the public meeting for review and approval of the substantial amendment.
- c. The substantial amendment must be presented to and approved by the Board of Supervisors of Loudoun County.
- d. The County shall submit to HUD a description of the adopted substantial amendment. A letter transmitting such description shall be submitted by Loudoun County's Director of Housing and Community Development to HUD and signed by the County Administrator.

O. Emergency Activities:

During the course of implementation of the CDBG program, if the County makes an emergency declaration as a result of a situation or condition that has arisen through no fault of the County, immediate action or remediation may be taken. If CDBG funds are not available to resolve or remediate that situation or condition, the County may proceed with corrective action during the 30-day comment period. The County must publish a notice concurrently, in the newspaper of general circulation in the area, and allow residents to respond to the expenditure of CDBG funds during the 30-day comment period.



P. Consolidated Annual Performance and Evaluation Report (CAPER):

A notice will be published in the local newspaper of general circulation in the area informing the public of the availability of the County's CDBG Consolidated Annual Performance and Evaluation Report (CAPER) and providing the opportunity to comment on the CAPER. A period of no less than fifteen (15) calendar days from the date of publication shall be provided to receive citizen comments prior to adoption by the Board of Supervisors of Loudoun County.

The County will consider any comments or views of residents, received in writing or orally, concerning its Consolidated Annual Performance and Evaluation Report. A summary of these comments or views shall be attached to the CAPER.

Q. Disability Accommodations:

Loudoun County's CDBG Program Manager must be notified at least three (3) days prior to a public hearing/meeting that those accommodations are needed. For TTY/TDD service, individuals should use the Virginia Relay Center by dialing 711.

R. Non-English-Speaking Residents:

Loudoun County's CDBG Program Manager must be notified at least three (3) days in advance of a public meeting/hearing that accommodations are needed, including non-English speaking residents, so that arrangements can be made to accommodate the resident, including a translator, at the public hearing/meeting. Also, a summary of the minutes of the hearing will be transcribed, when requested, for the benefit of non-English speaking persons.

S. Declaration of an Emergency:

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of Virginia, and regulatory flexibility is permitted by HUD, Loudoun County will adhere to the following process concerning public hearings and public display of plans when necessary for public health reasons. These emergency procedures will apply to Consolidated Plan/Annual Action Plan Amendments and initial plan submissions, as permitted through a regulatory waiver authority or programmatic flexibility:

- If the County is unable to hold open public hearings in person, the County will be allowed instead, to hold virtual public hearings through conference calls or an online video conference call



platform, as long as the public is able to provide comments during the virtual public hearing.

- If the County is not able to physically place the plans on public display at the locations referenced in the Citizen Participation Plan, the County will put the plans on the County's website (<https://www.loudoun.gov/1674/Community-Development-Block-Grant>) and will also email copies of the plans to any person who requests a copy of the plans via an email request.
- If the Board of Supervisors is unable to conduct an open public forum type meeting, the County is allowed to approve the plans at a virtual Board of Supervisors Meeting, since an in-person Supervisor's Meeting will not be held because of the Declaration of an Emergency.
- If HUD has waived the public comment period for substantial amendments to the Consolidated Plan/Annual Action Plan from thirty (30) to a lesser number of days, the number of days may be reduced to such number approved by HUD.
- If HUD has waived the public comment period for the Consolidated Plan/Annual Action Plan submission from thirty (30) to a lesser number of days, the number of days may be reduced to such number approved by HUD.
- All other requirements relative to the County's Citizen Participation Plan for Consolidated Plans remain in effect, including the consultation requirements, as required by 24 CFR 91.105.

T. Residents' Comments on the Citizens Participation Plan:

Loudoun County will provide residents with the opportunity to comment on this Citizen Participation Plan. Copies of this proposed Citizen Participation Plan will be available at Loudoun County Government Center, all branches of the Loudoun County Public Library System, and on the website at <https://www.loudoun.gov/>. A public notice will be published in the local newspaper of general circulation in the County for a period of fifteen (15) calendar days prior to the adoption of the Citizens Participation Plan by Loudoun County in order for residents to comment on the plan. Copies of the Citizens Participation Plan will be made available upon request, in a format accessible to persons with disabilities. Substantial amendments to this plan will follow the same procedure as the adoption of the original plan.

U. Revisions to the Citizen Participation Plan:

Revisions, amendments, and changes may be made to the Citizen Participation Plan at any time. Residents will be afforded the opportunity to



comment on any amendments to the Citizen Participation Plan. A notice of the proposed amendments to the Citizen Participation Plan will be published in the local newspaper of general circulation in the area, informing the public of the availability of the Citizen participation Plan and its proposed changes. The County will advertise once and will notify residents that they have a period of up to fifteen (15) days from the date of the newspaper notice to respond to the proposed changes in the Citizen Participation Plan.

THIS CITIZEN PARTICIPATION PLAN WAS ADOPTED BY LOUDOUN COUNTY, AT ITS REGULARLY SCHEDULED BOARD PUBLIC HEARING HELD ON THE 14th DAY OF SEPTEMBER 2022.

COUNTY OF LOUDOUN, VA