



2026-2030

Union County Citizen Participation Plan



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SECTION I – INTRODUCTION:

Union County is a federal entitlement jurisdiction through the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). Union County does not currently participate in the HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA), but reserves the right to pursue funding from these or any other potential HUD funding program. Should the County become a participant in any such program, the policies and references in this document related to the CDBG program will also be assumed to apply to those programs.

The County's office of Budget and Grants Management administers the County's Federal Grants including the CDBG program. In accordance with CDBG regulations at 24 CFR § 91.105 for citizen participation, federal entitlement jurisdictions must adopt a Citizen Participation Plan and update the plan on an as needed basis.

The Union County Board of Commissioners adopted its initial Citizen Participation Plan in May 1995. It was last modified in April 2020 in response to the Coronavirus Aid, Relief, and Economic Security (CARES) Act authorizing Emergency Declaration for Citizen Participation to expedite the Amendment Process.

SECTION II – PURPOSE:

The purpose of the Citizen Participation Plan is to provide Union County a guide for citizen involvement in the Federal Entitlement Programs funded through the U.S. Department of Housing and Urban Development (HUD).

The Citizen Participation Plan is designed to serve the following specific purposes:

- To encourage the participation of all residents, community-based and faith-based organizations, social service agencies, housing providers, economic and community development groups, public and private non-profits, businesses, educational and financial institutions, broadband internet service providers, organizations working to narrow the digital divide, emergency management agencies, and land and water management agencies, etc. in the planning and implementation process of the five-year consolidated plan and subsequent annual action plans.
- To present a logical and clear approach to the various components and requirements of the federal entitlement programs.
- To identify the responsible departments or agencies in Union County responsible for administering the Entitlement Programs.
- To clarify and identify opportunities for individual residents, community organizations, and neighborhood groups to work with County officials and staff in developing the five-year consolidated plan, its annual action plan and performance reports indicating the accomplishments of the programs.

- To provide information and the means for citizens, organizations, and other stakeholders to understand and access the federal programs and required regulations.
- To act as guidance for citizen participation, to be used by all agencies, officials, and staff who are responsible for various components of the County's Five-Year Consolidated Plan and Annual Action Plan.

SECTION III – ENCOURAGEMENT OF CITIZEN PARTICIPATION:

Union County has prepared and adopted its Citizen Participation Plan to establish policies and procedures for citizen participation. The Citizen Participation Plan provides for and encourages citizens to participate in the development of a five-year consolidated plan, any substantial amendments to the five-year consolidated plan, annual action plans, and the annual performance and evaluation report. The plan is specifically designed to encourage participation by low-and-moderate income persons, particularly those residents in neighborhoods that are predominantly low-and-moderate income as defined by the County. Union County will take appropriate actions to encourage participation of all citizens, including minorities, the elderly and disabled, and non-English-speaking persons.

Union County also encourages the participation of local and regional institutions, the Continuum of Care, and local private and non-profit organizations, including businesses, philanthropic organizations, housing providers, social service agencies, educational and financial institutions, as well as community-based and faith-based organizations.

The County will encourage participation of residents of publicly assisted housing in the process of developing, implementing, and amending (if necessary) the five-year consolidated plan or annual action plan. The County will work with the local Public Housing Authority (PHA) to reach resident advisory boards, resident councils, and resident management corporations. Other low-income residents of targeted revitalization areas in which public and/or assisted housing is located, will also be encouraged to participate in the five-year consolidated planning process. The County will provide information about the activities included in the five-year plan for the PHA to present at its public hearing for the PHA Plan.

SECTION IV – DEVELOPMENT OF THE FIVE-YEAR CONSOLIDATED PLAN AND ANNUAL ACTION PLAN:

The HUD application for the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) is a single document known as the Consolidated Plan. The plan is for a five (5) year period. Each year the County prepares an Annual Action Plan for how it proposes to apply its annual allocation in conformance with the goals and objectives of the Five-Year Consolidated Plan. HUD has consolidated the reporting requirements for these programs into one

annual performance report known as the Consolidated Annual Performance and Evaluation Report (CAPER).

The County's Citizen Participation Plan includes the following requirements for the development of the Five-Year Consolidated Plan as required by federal regulations:

- **Application Development** – Prior to the submission of the Five-Year Consolidated Plan, Annual Action Plan, a Section 108 Loan Guarantee Application, and other applications for CDBG, or other federal funds, and amendments to previously approved plans and applications, the County will notify residents, neighborhood organizations, and other interested parties about the application requirements; eligibility of project activities; timetable for submission; funding amounts; range of activities that may be undertaken; estimated benefit to persons of low-and-moderate income; and other information necessary to involve residents in the development of plans and applications.
- **Program Progress** – Prior to the development of annual application for CDBG funds, the County will report to the public on the progress made on its expenditure of funds at public meetings, public hearings, and through the local news media.
- **Program Implementation** – Resident involvement may take the form of advisory committees, direct involvement, self-help efforts, or other types of citizen participation during the program implementation process. The roles that residents and other stakeholders in the County play in the implementation of CDBG programs include attendance at meetings, calling-in, writing-in, etc.
- **Monitoring Evaluation** – Opportunities for residents to monitor and evaluate the County's CDBG program progress as well as review and comment on the CAPER. The following methods are available: direct contact with staff, direct contact between staff and groups, and direct contact between residents and elected/appointed officials.
- **Submission of Views and Proposals** – The submission of views and proposals, especially from low-and-moderate income persons, minority groups, and other persons or organized groups, can be made on a continuous basis and are encouraged to the greatest extent possible. Submission can be in the form of personal contact, mail, email, and telephone contact; petitions; attendance at public hearings/meetings; through questions and surveys; and other available means. Responses to all submissions shall be in a timely manner and shall not exceed a period of fifteen (15) days after the voicing of the comment, or the date of receipt of a written comment or inquiry.

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

Ms. Monica Culbreath
Grants Specialist, Budget and Grants Management
Union County
500 North Main Street
Monroe, NC 28112

Comments by telephone or electronically should use the following:

Phone – (704) 283-3580

Email – Monica.Culbreath@unioncountync.gov

SECTION V – FIVE-YEAR CONSOLIDATED PLAN AND ANNUAL ACTION PLAN AMENDMENTS:

During the course of implementing the Five-Year Consolidated Plan and/or Annual Action Plan, the County may decide to make changes to its approved budget and/or activities. When a substantial change or substantial amendment to the Five-Year Consolidated Plan and/or Annual Action Plan is proposed, the following procedures will be followed.

Definition – Substantial Amendment

- A change to the original purpose for which the activity was selected, including the category of the National Objective selected, the allocation of priorities, or a change in the method of distribution of funds;
- A proposal to undertake a new activity not previously described or approved in the Annual Action Plan;
- A change in the purpose, scope, location, or beneficiaries of a previously approved activity;
- The use of program income that was not previously allocated to an eligible activity;
- The deletion or cancellation of a previously approved project;
- An increase or decrease in the size, scope of work or cost of a project activity by 50% or more of the line-item amount of an approved activity or program;
- A change to the location of the project activity or program from the original proposal, or an increase or decrease to the size of the project service area by 25% or more in size, or a necessary relocation of the activity to another area or site; and/or
- The use of contingency or unprogrammed funds in a given year.

Any proposed change meeting the definition of a substantial amendment shall require amendment of the Consolidated Plan and/or Annual Action Plan, public review and comment, and submission to HUD for review and approval.

Definition – Minor Amendments / Administrative Revisions

The County may make minor amendments or administrative revisions to its approved Five-Year Consolidated Plan and Annual Action Plan when the changes do not substantially alter the purpose, scope, location, beneficiaries, or national objective of the activity. Minor amendments

and administrative revisions are considered administrative in nature and do not constitute substantial amendments.

- Minor amendments or administrative revisions may include line-item budget adjustments, correction of administrative errors, minor schedule changes, funding reallocations between eligible cost categories within an approved activity, and other non-substantial changes necessary for efficient program administration.
- Budget revisions resulting in a cumulative increase or decrease of less than fifty percent (50%) of the approved line-item amount shall be considered a minor amendment or administrative revision and shall not constitute a substantial amendment.
- Minor amendments or administrative revisions shall not require a public hearing, public comment period, or substantial amendment process, provided the change does not meet the definition of a substantial amendment as outlined in this Plan.
- Such revisions may be approved administratively by the Office of Budget and Grants Management and documented internally in the program file.
- Minor amendments and administrative revisions shall remain consistent with all applicable HUD regulations and federal eligibility requirements.
- Revisions will be reported to HUD as required.
- Examples of revisions or minor amendments may include adjustments to engineering, architectural, environmental review, activity delivery, construction, program delivery, or other eligible line-item costs within an already approved project or activity.

Procedure

A description of the substantial amendment to the Five-Year Consolidated Plan or the Annual Action Plan will be published in a local newspaper of general circulation and posted on the County's website. The notice shall indicate the substantial amendment will be on public display for a period of thirty (30) days and a public hearing on the substantial amendment will be held prior to the Union County Board of Commissioners' approval.

SECTION VI – PERFORMANCE REPORTS:

All federal entitlement jurisdictions are required to submit an annual performance report to HUD. HUD requires that a Comprehensive Annual Performance and Evaluation Report (CAPER) be submitted to HUD within ninety (90) days after the end of the Grantee's Fiscal Year. The County Office of Budget and Grants Management will publish in a local newspaper of general circulation and post on the County's website a notice informing the public that the County has prepared the CAPER, and it is available for review and comment for a period of at least fifteen (15) days. The

fifteen (15) day period commences the day after publication of the notice, and the public has fifteen (15) days to make comments prior to the submission of the CAPER.

A summary of the comments or views shall be included in the CAPER. The County Office of Budget and Grants Management will submit the CAPER to the HUD-Greensboro Field Office.

SECTION VII – PUBLIC HEARINGS / MEETINGS:

All public hearings and meetings will be held in a timely manner and shall be accessible to all segments of the County's population, including accommodation for persons with disabilities. The Public Hearings and meetings shall be held at a time and place convenient and accessible to all persons who wish to participate.

Public hearings shall be held 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. The first public hearing is held during the planning process in the development of the Five-Year Consolidated Plan, Annual Action Plan, all Section 108 Loan Guarantee Applications, and other program applications. The second public hearing is held to obtain public comment prior to submission of an application for the above mentioned programs.

The Public Hearing notices shall be published at least ten (10) calendar days prior to the hearing date and shall be advertised in a local newspaper of general circulation.

The first public hearing will serve the purpose of providing a summary of program requirements, answering questions regarding the Annual Action Plan process, provide a tentative schedule for development and submission of the application.

The initial hearing is meant to obtain the views of citizens and organizations regarding overall community development and housing needs, development of proposed activities, including the estimated amount that will benefit persons of low- and moderate-income, and to review program performance.

The intent of the meeting(s) will be to provide a mechanism for citizens participation at the County-wide, municipal and neighborhood level. Comments or recommendations on projects in specific localities will be encouraged.

The hearing will be conducted by the Office of Budget and Grants Management, which is responsible for preparation of the application, in the Board Room of the Union County Government Center, or a similar accessible and suitable location if the Board Room is unavailable.

The Board Room of the Union County Government Center, 500 North Main Street, Monroe N.C. 28112, is accessible to persons with physical disabilities. If special arrangements need to be made to accommodate residents in order for them to participate in the public hearing, please contact Ms. Monica Culbreath, Grants Specialist, Office of Budget and Grants Management at (704) 283-

3580 or Monica.Culbreath@unioncountync.gov. Persons who have a hearing impediment may contact 7-1-1 for the TTY/TTD relay. Generally, requests for assistance should be made at least two (2) working days prior to the hearing day.

Notice of the hearing will appear in the legal section of a newspaper of general circulation within the County. The notice shall be published at least ten (10) days prior to the public hearing.

In the event that non-English speaking residents will be expected to attend public hearings, translation assistance will be provided so they may participate effectively in the hearing. If the Office of Budget and Grants Management is notified within three (3) days prior to the public hearing, it will make arrangements to accommodate non-English speaking residents, including having a translator present at the public hearing or meeting. Also, a summary of the minutes of the public hearing will be translated in another language for the benefit of non-English speaking residents. Alternate language translations of public notices, surveys, etc. will be provided for residents who do not speak or read English.

SECTION VIII – PUBLIC NOTICE:

A legal notice will be published in a local newspaper of general circulation notifying the public that the proposed Five-Year Consolidated Plan and/or Annual Action Plan 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.

Copies of the proposed plans will be available at the following locations:

- **Union County Office of Budget and Grants Management**
500 North Main Street
Monroe, NC 28112

SECTION IX – AVAILABILITY TO THE PUBLIC:

A second public hearing will be undertaken when the draft application for funding has been prepared.

Upon completion of the proposed Five-Year Consolidated Plan and/or Annual Action Plan, Union County shall publish a draft of the proposed Plan with sufficient time to permit citizens to comment on the Plan prior to its approval and adoption by the County. The notice will appear in the legal section of a local newspaper of general circulation at least thirty (30) calendar days prior to the adoption of the Plan and will include the locations where the Plan will be made available for public review.

The second public hearing will be conducted during the thirty (30) day review period of the proposed Five-Year Consolidated Plan and/or Annual Action Plan. The notice of this second public

hearing will provide locations where the Draft Plan is available for review. The notice will be published at least ten (10) days prior to the date of the hearing.

The hearing will be conducted by the Office of Budget and Grants Management. Public Hearings will be held at times and locations that are convenient to potential and actual beneficiaries of the proposed programs or activities. Public Hearings will be held in the Board Room of the Union County Government Center, 500 North Main Street, Monroe N.C. 28112, or at a similar accessible and suitable location if the Board Room is unavailable. The Draft Five-Year Consolidated Plan or Annual Action Plan will also be posted on the County's website: <https://www.unioncountync.gov/>.

When planning begins for the upcoming year, organizations within the County will have the opportunity to submit comments, proposals, or recommendations on the Community Development Block Group Program and other Federal Programs. Any residents or property owners in the County or any organization representing County residents or property owners may participate.

Such a comment, proposal or recommendation may be directed to the attention of Ms. Monica Culbreath, Grants Specialist, Union County, Office of Budget and Grants Management, 500 North Main Street, Monroe, NC, 28112 or by email at Monica.Culbreath@unioncountync.gov, or by calling (704) 283-3580. All submitted written statements will receive a written response no later than fifteen (15) working days from the date of receipt, setting forth the action taken or to be taken with respect to the comment, proposal, or recommendation. However, written statements that are intended to suggest modifications to the application can only be considered if they are received before the end of the thirty (30) day review period on the draft Annual Action Plan or Five-Year Consolidated Plan.

SECTION X – ACCESS TO RECORDS:

The County shall provide full public access to the CDBG program information (excepting confidential personal information) and shall conduct 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 about the Community Development Block Grant Program, Section 108 Loan Guarantee Program, and all other programs, as applicable, including at a minimum the following:

- At the time when the County begins its Community Development Block Grant Program, Section 108 Loan planning process, and any other programs, as applicable, include:
 - Total amount of funds available, including program income;
 - The range of activities eligible or ineligible, including the estimated amount which will benefit low-and moderate-income persons;

- Plans to minimize displacement and assist any person(s) displaced, specifying the type and level of assistance the County will make available to persons displaced, even though the County anticipates no displacement. The Five-Year Consolidated Plan must state when and how the County will make this information available;
 - The process that will be followed in developing and approving projects or programs;
 - The standards of participation and goals for the Citizen Participation Program; and
 - Summary of important program requirements.
- 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:
 - All mailing, promotional materials, and news releases;
 - 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;
 - Copies of CDBG Program regulations;
 - 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 programs; and
 - Costs of copying will be established by local and state laws.
- 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:
 - Personal contact;
 - Mail, email, and telephone contact;
 - Petitions;
 - Attendance at public meetings/hearings;
 - Through questionnaires and surveys; and
 - Other available means.
- The submission of views and proposals shall be an on-going process and at a minimum during the following stages:
 - The planning process;
 - The annual HUD application process; and
 - The implementation process.

Responses to all submissions shall be in a timely fashion and shall not exceed a period of fifteen (15) days after 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:

Union County Office of Budget and Grants Management
500 North Main Street
Monroe, NC 28112

SECTION XI – TECHNICAL ASSISTANCE:

The Union County Office of Budget and Grants Management shall provide technical assistance to groups/organizations that 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 Five-Year Consolidated Plan.

The County's staff will assist these groups to prepare their proposals and will provide assistance in preparing cost estimates for projects proposed by low-and-moderate-income groups.

SECTION XII – COMPLAINTS:

Any individual or organization may choose to file a complaint concerning Union County's Entitlement Programs. Complaints should be forwarded to Ms. Monica Culbreath, Grants Specialist, Union County, Office of Budget and Grants Management, 500 North Main Street, Monroe, NC, 28112 or by email at Monica.Culbreath@unioncountync.gov, or by calling (704) 283-3580. The complaint should contain the following information.

- The name and signature of the complaint, or if any organization has prepared the complaint, the name and signature of the officer of the organization responsible for correspondence.
- The address to which Union County's response should be mailed.
- A telephone number where the complaint or an individual knowledgeable about the substance of the complaint can be reached during business hours.
- The nature of the complaint, including any relevant information or documentation.
- A recommendation concerning how the complainant wishes to have the matter resolved.

The Office of Budget and Grants Management will make every reasonable effort to provide a written response to a complaint within fifteen (15) days of its receipt. Union County will indicate its position on the matter and the action it proposes to take. The Office of Budget and Grants Management will not be obligated, however, to respond to any anonymous or fictitious complaints.

If the Office of Budget and Grants Management's response does not resolve the problem to the satisfaction of the complainant, the complainant may request a meeting with the County Manager to seek resolution, within two (2) weeks of the initial response by the Office of Budget and Grants Management. This meeting, whenever possible, shall be held within fifteen (15) working days of receipt of the request for a meeting. Following such a meeting the County shall

notify the complainant of its proposed resolution within ten (10) working days of the date of the meeting. If the complainant feels that the response is still not satisfactory, the complainant may follow the procedure described in the following section.

The above complainant procedure shall not be considered a prerequisite for persons or organizations wishing to file objections to applications pursuant to Federal regulations.

Individuals or organizations who have followed the procedure described above to resolve complaints may choose to file an official objection with the U.S. Department of Housing and Urban Development, North Carolina Field Office, 1500 Pinecroft Road, Suite 401, Greensboro, NC 27407. Persons may choose to file a complaint directly with HUD and not follow the local complaint procedure established in #6 above. Following the local complaint procedures is not required prior to filing an objection with HUD. However, citizens are encouraged to bring complaints at the local level for resolution as HUD procedures require the Union County to respond to any complaint filed. Therefore, more immediate resolution to a complaint is generally at the County level.

SECTION XIII – AMENDMENTS TO THE PLAN:

Union 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 the Union County, Office of Budget and Grants Management, and the County website <https://www.unioncountync.gov/>. A public notice will be published in a local newspaper of general circulation for a period of fifteen (15) calendar days prior to the adoption of the Citizen Participation Plan by the County of Union in order for residents to comment on the plan. Copies of the Citizen 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.

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.

SECTION XIV – EMERGENCY DECLARATIONS:

When a Declaration of an Emergency has been ordered by the President of the United States or the Governor of North Carolina and regulatory flexibility is permitted by HUD, the 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 the Five-Year

Consolidated Plan, Annual Action Plan, Substantial Amendments, and initial plan submissions, as permitted through a regulatory waiver authority or programmatic flexibility:

- If the County is unable to hold an open public hearing in person, the County will hold virtual public hearings through conference calls or an online video conference 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 place the plans on the County's website (<https://www.unioncountync.gov>) and will also email copies of the plans to any person who requests a copy of the plans via an email request.
- If the Union County Board of Commissioners is unable to conduct an open public forum meeting, the County may approve the plans at a virtual Union County Board of Commissioners meeting if an in-person meeting will not be held due to the Declaration of an Emergency.
- If HUD has waived the public comment period for the Five-Year Consolidated Plan and Annual Action Plan submission from thirty (30) to a lesser number of days, the public notice will include the number of days in the reduced comment period for public awareness.
- All other requirements relating to the County's Citizen Participation Plan for Five-Year Consolidated Plans and Annual Action Plans remain in effect, including the consultation requirements, as required by 24 CFR 91.105.