



OAKLAND
COUNTY MICHIGAN

NEIGHBORHOOD &
HOUSING DEVELOPMENT



CITIZEN PARTICIPATION PLAN



MAY 2026



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INTRODUCTION

Oakland County is entitled to receive federal housing and community development grants available through the U.S. Department of Housing and Urban Development (HUD) as an “Urban County” entitlement jurisdiction and “Lead Entity” for the Oakland County HOME Consortium. Housing and community development grants include Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) Program and the Emergency Solutions Grant (ESG).

This Citizen Participation Plan (CPP) is prepared and implemented in accordance with the guidance provided in HUD Regulations at 24 CFR Part 91.105 and describes the policies and procedures for involving residents in critical planning issues related to the County’s CDBG and ESG programs and in the Home Investment Partnership Program (HOME) for the Oakland County HOME Consortium. As a CDBG Urban County, Oakland County’s CDBG Program serves 52 local units of government (“Subrecipients”), including the Cities of Auburn Hills, Berkley, Birmingham, Bloomfield Hills, Clarkston, Clawson, Farmington, Ferndale, Hazel Park, Huntington Woods, Keego Harbor, Lathrup Village, Madison Heights, Northville, Novi, Oak Park, Orchard Lake Village, Pleasant Ridge, Rochester, Rochester Hills, South Lyon, Sylvan Lake, Troy, Walled Lake and Wixom; Townships of Addison, Bloomfield, Brandon, Commerce, Groveland, Highland, Holly, Independence, Lyon, Milford, Oakland, Orion, Oxford, Rose, Royal Oak, Springfield, West Bloomfield and White Lake; Villages of Beverly Hills, Franklin, Holly, Lake Orion, Leonard, Milford, Ortonville, Oxford and Wolverine Lake.

Oakland County, as the CDBG Urban County also serves as the Lead Entity for the Oakland County HOME Consortium and administers HOME funds on behalf of the Consortium members. Oakland County HOME Consortium members include the Oakland County CDBG Urban County partner communities named above and the independent CDBG entitlement communities of the Cities of Southfield, Farmington Hills, and Royal Oak.

This CPP provides for HOME-related citizen participation within all Oakland County HOME Consortium communities. However, Consortium members that are also CDBG entitlement communities receiving CDBG funds directly from HUD and operating independently of the Oakland County CDBG program (namely, Southfield, Farmington Hills, and Royal Oak) are required to have their own local CDBG citizen participation plans.

Encouragement of Citizen Participation

It is the policy of the County to ensure the meaningful participation of its residents and citizens in the development of any consolidated plan, any substantial amendment to a consolidated plan, and the annual performance report, with particular emphasis on participation by low- and moderate-income residents and residents living in low- and moderate-income neighborhoods. The County also encourages the participation of service providers, government agencies, housing commissions, the Continuum of Care, and others in the development of all HUD required consolidated planning documents.

Oakland County's CPP provides a guide for public consultation, input and participation and encourages citizen participation in identifying housing, community development, fair housing and public service needs; funding priorities; target populations to be served through available resources; and how to address any amendments to the Five Year Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Report, and Citizen Participation Plan as required by HUD.

The County shall provide for and encourage citizen participation with particular emphasis on:

- Low and moderate-income persons, particularly those living in areas where CDBG funds are proposed to be used;
- Residents of predominantly low and moderate-income neighborhoods;
- Minorities;
- People with Limited English Proficiency;
- People with Disabilities;
- Residents of public and other assisted housing developments; and
- Local and regional institutions, the regional Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations).

CITIZEN PARTICIPATION STANDARDS

Public Hearings

Oakland County will conduct at least two Public Hearings each year, scheduled at different stages of the consolidated planning process, to obtain residents' views and to respond to proposals and questions. Taken together, the two public hearings will address:

- Housing and community development needs;
- Proposed use of program funds;
- Strategies for affirmatively furthering fair housing; and
- Program performance during the past year.

One Public Hearing will be held to provide residents information on all CDBG programs and an opportunity to comment on the proposed use of all CDBG, HOME Consortium and ESG funds as part of the annual consolidated grant application (Annual Action Plan) process.

A second Public Hearing will provide residents an opportunity to comment on the Consolidated Annual Performance and Evaluation Report (CAPER) and to solicit ongoing feedback on the County's housing and community development needs.

Oakland County may hold additional Public Hearings for the purpose of reviewing amendments to the County's Consolidated Plan or Action Plan or for other purposes.

Public Hearings will be held at the Oakland County Health Division, 1200 N. Telegraph Rd. 34E Executive Conference Room 257, Pontiac, MI 48341, or in other locations which are convenient to potential and actual beneficiaries, and which are accessible to people with disabilities. With prior notice, accessibility assistance will also be made available for sensory limitations or language barriers such as sign language interpreters and/or language translators.

Subrecipient cities, villages, and townships participating in the Urban County must ensure they adhere to their own local requirements for identifying projects, approving their applications to Oakland County for CDBG funding, and accepting CDBG awards.

Public Notices and Outreach

A Public Notice of opportunity to review and comment on draft plan or performance report documents will, at a minimum, be published in a newspaper of general circulation and posted on the Oakland County website. The Public Notice will include a list of locations where copies of the proposed plan document or performance report may be

obtained or examined. When advertising a Public Hearing, the Public Notice will be published at least 10 days prior to the Public Hearing date. The notice will include sufficient information about the purpose of the Public Hearing to permit informed comment from residents. An effort will be made to also publish notices in publications serving minority communities and non-English speaking residents, dependent on availability and publication deadlines. Notices will include information on assistance requests for accessibility for persons with physical disabilities or language barriers.

Public Comments

Residents, organizations, agencies and other interested parties are encouraged to submit their comments on the proposed Citizen Participation Plan, Consolidated Plan, Annual Action Plan, and CAPER. The County of Oakland and, when appropriate, the HOME Consortium member communities, will consider written, electronic and oral comments received in preparing or the final Citizen Participation Plan, Consolidated Plan, Annual Action Plan, and CAPER for submission to HUD, and will include as an attachment to the respective document a summary of all comments received and the actions taken to address each comment.

The County will provide residents, service providers, government agencies, and other stakeholders a sufficient time period (not less than 30 days) to review and comment on the proposed Consolidated Plan, Annual Action Plan, and Substantial Amendments and not less than 15 days to review and comment on the Citizen Participation Plan and Consolidated Annual Performance and Evaluation Reports (CAPER). All written comments received, or oral comments made at public hearings will be considered. A summary of such comments will be attached to the relevant plan or report.

Citizens Advisory Council (CAC)

The County maximizes citizen participation through its Citizens Advisory Council, a mechanism for residents representing broad socioeconomic and geographic areas to advise the County on the planning, implementation, and assessment of the programs. The CAC consists of 20 members appointed by the Board of Commissioners who represent participating communities, County Commissioners, the general public, and Oakland County's low-income population. The CAC serves in an advisory capacity to staff and the Board of Commissioners in developing and accessing federal grant program policies. Despite selection from various geographic regions, all members represent the full County.

DEVELOPING THE CONSOLIDATED PLAN

As soon as feasible after beginning the public participation process for a new Consolidated Plan and/or Annual Action Plan, and no later than at the first public hearing, the County will make available to residents, public agencies, and other interested parties any available HUD-provided or other supplemental data that will inform the plan. This data may be provided by posting links or cross-referencing data on HUD's website.

Additionally, before adopting a new Consolidated Plan and/or Annual Action Plan, the County will make available to residents, public agencies, and other interested parties the following information:

- The amount of assistance the County expects to receive (including grant funds and program income);
- The range of activities that may be undertaken;
- The estimated amount of funding that will benefit persons of low- and moderate-income; and
- The County's plan to minimize displacement of persons and to assist any person displaced, specifying the types and levels of assistance the County will make available (or require others to make available) to persons displaced, even if no displacement is expected to occur.

This information will be presented at the Public Hearing and/or will be contained in the text of the draft Consolidated Plan and/or Annual Action Plan under review. In years when a Consolidated Plan is not due to HUD, the requirements in this section shall apply to development of the Annual Action Plan.

SUBSTANTIAL AMENDMENTS

From time to time, it may be necessary for the County to amend the Consolidated Plan or an Annual Action Plan to allow for new projects or activities; modification of existing projects or activities; or other administrative actions.

HUD regulations at 24 CFR Part 91.505 require amendments to the Consolidated Plan and/or Annual Action Plans whenever there is a change in the allocation priorities or method of distributing funds presented in the plan; a change in the use of funds to an activity not described in the Annual Action Plan; or a change in the purpose, scope, location, or beneficiaries of an activity.

Some amendments will be considered Substantial while others will be considered Administrative. The need to prepare a Substantial Amendment triggers public notice, comment, and hearing requirements described in the preceding CPP sections.

The following criteria will be used by the County – if any one criterion applies, a substantial amendment will be required:

- A change in the plan's priority needs or a change in the method of distribution of funds;
- A shift in funds from any existing eligible activity type covered by an Annual Action Plan to a different eligible activity type not previously listed and described in the Consolidated Plan/Annual Action Plan; or
- When a proposal is made to amend the description of an existing project in such a way that the newly described purpose, scope, location, or beneficiaries differ significantly from the original project's purpose, scope, location, or beneficiaries.

Plan changes not meeting one of the above criteria will be considered administrative amendments and are not subject to public notice, comment, and hearing requirements. Examples of typical administrative amendments include transfers of funds to reflect actual program spending between and among programs identified in the plans when 1) such transfer does not result in the addition or elimination of the activities described and 2) such transfer does not cause a change in program priorities as described. The following changes will not be considered as substantial amendments: 1) changes between new construction and substantial rehabilitation, and 2) changes arising from urgent community needs due to emergency or disaster situations.

The County will provide residents and participating communities with reasonable notice and an opportunity to comment on substantial amendments. Reasonable notice will be given through a Public Notice in a newspaper of general circulation. Opportunity to offer comments will be provided by a period of not less than 30 days, identified in the Public Notice, to receive comments on the substantial amendments before the amendment is implemented. The notice will clearly provide the name and address of the person responsible for receiving these comments. The County will consider any comments or views of residents and participating communities received in writing, if any, in preparing the substantial amendment to the plans or reports. A summary of these comments or views not accepted and the reasons therefore shall be attached to any substantial amendment to the plans or reports.

EMERGENCY PLAN AMENDMENTS

In the event of a local, state, or federally declared emergency or disaster, it may be necessary for the County to fund new activities and/or reprogram funds, including canceling activities to meet urgent community needs. Where program funds covered by the County's Consolidated Plan and/or Annual Action Plan may be expended to carry out eligible activities to address the County's disaster response, the CPP's public notice and public comment period requirements may be expedited upon receipt of a waiver from HUD.

HUD has the authority to waive certain regulatory provisions of the CDBG, ESG and HOME programs subject to statutory limitations. Examples of good cause for such waivers include the following:

- Presidential disaster declarations under Title IV of the Stafford Act.
- Oakland County may seek a waiver to its Citizen Participation Process in emergency situations when expedited assistance offered through Consolidated Plan/Annual Action Plan covered programs is deemed necessary by the County Executive.
- U.S. Department of HUD issues notices to waive deadlines for submission and reduction of public comment periods.

Following HUD issuance of waiver notices or approval of a waiver request, the County reserves the right to amend the Citizen Participation Plan's standards as follows:

- A reduction in the public comment period for Consolidated Plan/Annual Action Plan substantial amendments from 30 days to 5 days.
- Flexibility in determining what constitutes reasonable notice and opportunity to comment.
- Forego public hearings when the emergency conditions dictate caution; however, the County, at its option, may hold virtual public hearings if determined to be necessary.

ACCESS TO RECORDS

The County shall provide residents, public agencies, and other interested parties with reasonable and timely access to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER, and information concerning the County's use of federal grant assistance under covered programs. A reasonable number of free copies of the

County's plan documents and performance reports, as well as all amendments to the Consolidated Plan and Annual Action Plan, will be provided to citizens and groups requesting them. These documents shall be maintained for not less than 5 years at the County's Neighborhood & Housing Development Department and on the County's website. Materials will also be made available in a form accessible to persons with disabilities and limited English proficiency upon request.

TECHNICAL ASSISTANCE

The County will provide technical assistance to groups representing low income persons, as well as to community-based organizations and interested residents that request such assistance in developing proposals for funding under any of federal or local funding sources covered by the Annual Action Plan and/or Consolidated Plan, with the level and type of assistance to be determined by the County. Anyone requiring assistance should contact the Community & Home Improvement Division at 248-858-0493.

COMPLAINT PROCEDURES

Written complaints regarding the County's Consolidated Plan process, Consolidated Plan amendments, and/or annual program performance reports may be submitted at any point during the program year to Oakland County Neighborhood & Housing Development Department, 1200 N. Telegraph Road, Building 34E, Pontiac, MI 48341 or via email to nhd@oakgov.com. The County will accept written complaints provided they specify the following:

- A description of the complaint and supporting facts and data; and
- Name, address, and telephone number of the person and the date of comment.

The County will provide a timely, substantive written response, within 15 working days where practicable, to any complaints so received.

ANTI-DISPLACEMENT POLICY

The County is committed to minimizing the involuntary and permanent displacement of residents as a result of federally assisted projects. The County's CDBG, HOME Consortium and ESG Programs are operated under a Residential Anti-Displacement and Relocation Assistance Plan as required by the U.S. Department of Housing and Urban Development. A copy of this plan is available upon request. While no

displacement is expected as a result of proposed Community Development activities, the County is prepared to assist any resident found to be so displaced. Relocation benefits, including payment for replacement housing and reasonable moving expenses, would be offered to residents who are displaced. Benefits and procedures for displacement would be carried out in conformance with the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1987, as amended.

MORE INFORMATION

For more information, contact Oakland County Neighborhood & Housing Development Department, 1200 N. Telegraph Road, Building 34E, Pontiac, MI 48341; call 248-858-0493; or email nhd@oakgov.com.

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QUICK REFERENCE GUIDE

Type of Document	Public Notice	Public Comment Period	Public Hearing
Citizen Participation Plan (and amendments thereto)	Yes Publish at least 10 days prior to the public hearing date or at the beginning of the public comment period, whichever is first.	Yes 15-day public comment period ending prior to Board of Commissioners approval of the item.	Yes (Can be concurrent with a public hearing associated with another plan or document.)
Consolidated Plan and/or Annual Action Plan	Yes Publish at least 10 days prior to the public hearing date or at the beginning of the public comment period, whichever is first.	Yes 30-day public comment period ending prior to Board of Commissioners approval of the item.	Yes
Substantial Amendments to Consolidated Plan and/or Annual Action Plan	Yes Publish to coincide with the beginning of the public comment period.	Yes 30-day public comment period ending prior to Board of Commissioners approval of the item.	Not Required
Annual Performance Report/CAPER	Yes Publish at least 10 days prior to the public hearing date or at the beginning of the public comment period, whichever is first.	Yes 15-day public comment period prior to HUD submission.	Yes