

DRAFT – ON PUBLIC DISPLAY April 2020 (15 days)

Bensalem Township



CITIZEN PARTICIPATION PLAN

**RELATING TO THE ADMINISTRATION OF GRANT PROGRAMS PROVIDED TO
BENSALEM TOWNSHIP BY THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT (HUD)**

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)

**BENSALEM TOWNSHIP
CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF THE GRANT PROGRAMS OF THE U.S.
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Table of Contents

A.	Introduction	5
	<ul style="list-style-type: none">• Purpose• Lead Agency• Effective Date	
B.	Encouragement of Citizen Participation	5
	<ul style="list-style-type: none">• General• Non-English Speakers• People with Disabilities• LMI People• Organizations and Agencies• Local Public Housing Agency• Public Notices• Public Hearings• Technical Assistance• Online Access• Other Engagement Techniques• Township Contact Person• In the Event of an Emergency	
C.	The Citizen Participation Plan	10
	<ul style="list-style-type: none">• Plan Development• Public Review of the Draft Plan• Public Hearing• Comments Received on the Draft Plan• Bensalem Township Council Action• Submission to HUD• Amendments to the Approved Citizen Participation Plan• Amendment Considerations• Draft Amended Plan Review• Comments Received on Draft Amended Citizen Participation Plan• Public Hearing• Executive Action• Submission to HUD• Plan Access	

**BENSALEM TOWNSHIP
CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF GRANT PROGRAMS OF THE U.S.
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Table of Contents continued

D.	The Consolidated Plan	13
	<ul style="list-style-type: none">• Plan Development• Stakeholder Consultation and Citizen Outreach• Public Hearings• Potential Displacement of People• Public Display and Comment Period• Comments Received on the Draft Consolidated Plan• Bensalem Township Council Action• Submission to HUD• Revisions to the Consolidated Plan• Revision Considerations• Public Display and Comment Period• Comments Received on the Draft Revised Consolidated Plan• Bensalem Township Council Action• Submission to HUD• In the Event of a Disaster• Plan Access	
E.	The Annual Action Plan	18
	<ul style="list-style-type: none">• Plan Development• Public Hearings• Public Display and Comment Period• Comments Received on the Draft Annual Action Plan• Bensalem Township Council Action• Submission to HUD• Revisions to the Annual Action Plan• Revision Considerations• Public Display and Comment Period• Comments Received on the Draft Revised Annual Action Plan• Bensalem Township Council Action• Submission to HUD• In the Event of a Disaster• Plan Access	

**BENSALEM TOWNSHIP
CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF THE GRANT PROGRAMS OF THE U.S.
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Table of Contents continued

F.	Consolidated Annual Performance and Evaluation Report (CAPER)	22
	<ul style="list-style-type: none">• Report Development• Report Considerations• Public Display and Comment Period• Comments Received on the Draft CAPER• Submission to HUD• Plan Access	
G.	Complaints	24

**BENSALEM TOWNSHIP
CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF THE GRANT PROGRAMS OF THE U.S.
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

A. Introduction

Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, Bensalem Township (referred to as the “Township”) sets forth the following Citizen Participation Plan (the “Plan”) as it relates to the administration of the grant programs funded by the U.S. Department of Housing and Urban Development (HUD), including:

- Community Development Block Program (CDBG)
- any other grants that may be provided by HUD.

The Plan presents the Township’s plan to provide opportunity for and encourage all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan (CPP)
- 2) The Analysis of Impediments to Fair Housing (AI)
- 3) The Consolidated Plan (CP)
- 4) The Annual Action Plan (AAP) , and
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER)
- 6)

Lead Agency

The Bensalem Township Office of Community Development is the lead agency responsible for the administration of the following HUD funded federal Community Development Block Grant Program.

Effective Date

Subsequent to approval of this Citizen Participation Plan by the Township Council and HUD, the Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The Township provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Assessment of Fair Housing, the Consolidated Plan, the Annual Action Plan, and the CAPER. The Township encourages participation of people with low- and moderate-incomes, particularly by residents of predominantly low- and moderate- income neighborhoods as well as those living in areas designated as revitalization areas, in slum and blighted areas, and/or in areas where HUD funds are proposed to be used. With respect to the public participation initiatives included in this Plan, the Township will take appropriate actions to encourage the

participation of all its citizens, including non-White residents, non-English speaking people, and people with disabilities, as described below.

Non-English Speaking People

The Township has determined that, based on 2011-2015 American Community Survey data, 21 percent of its residents (age 5 and older) speak a language other than English. However, only a small portion of this population speaks English less than very well. Spanish is the only language where more than 1,000 people speak English less than very well and comprises 2.2 percent of Township residents.

To encourage these residents to participate in the development of the Analysis of Impediments to Fair Housing (AI) and the Consolidated Plan (CP), the Township will undertake the following initiatives in addition to publishing advertisements in the *Courier Times* for these activities:

- At least one stakeholder interview or focus group session will be scheduled during the stakeholder consultation processes for both the AI and CP which will focus on people with limited English proficiency, and
- The Township will provide a Spanish version of meeting agendas, handouts and surveys at meetings and stakeholder interviews conducted for each planning process. The Township will continue to include the following language in advertisements related to the development of these documents:

La información será proporcionada en español a petición.

People with Disabilities

To encourage the participation of people with disabilities, the Township will include the following language in all of its public meeting notices published in the *Times Herald Record*:

Bensalem Township will make reasonable accommodations and services necessary for citizens with sensory-impairments and disabilities at the public meeting. Translation services may be offered upon request and availability. People requiring such accommodations/services should contact the Township at least three working days in advance of the meeting. People requiring information in alternative formats should contact the Office of Community Development at (215) 633-3605 (TDD Users: 7-1-1 PA Relay Center).

The Township will conduct all public meetings in locations that are handicapped-accessible, when available.

If requested, the Township will mail copies of public meeting notices to people who are homebound and request such accommodation no less than seven days prior to the public meeting.

People with Low- and Moderate-Incomes

The Township will conduct at least one public meeting during the development of the Analysis of Impediments, the Consolidated Plan, and the Annual Action Plan in a location in the community where at least 51% of its residents have low- and moderate-incomes.

Organizations and Agencies

The Township encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, emergency management agencies, and community-based and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

Local Public Housing Agency

The Township encourages, in consultation with the Bucks County Housing Authority (BCHA), the participation of residents of Section 8 Housing Choice Vouchers issued by the PHA, in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The Township will provide information to the Executive Director of the BCHA about the Analysis of Impediments to Fair Housing, its affirmatively furthering fair housing strategy, and Consolidated Plan activities related to housing developments so the BCHA can make this information available at the annual public hearings required for its Public Housing Agency Plan.

The Township encourages participation by PHA stakeholders. This will be carried out by providing to the PHA information on public meetings, surveys and other outreach initiatives related to the documents covered by this Plan.

Public Notices

Public review/comment periods and public hearings held in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan shall be advertised in the *Courier Times* no less than ten to fourteen days before the public review and comment period commences or the public hearing is held.

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for people with disabilities and non-English Spanish speakers in accordance with this Plan.

Technical Assistance

The Community Development staff is available to assist organizations and other eligible individuals that are interested in submitting a proposal to obtain funding through HUD funded Community Development Block Grant program. All potential applicants are strongly encouraged to contact the Bensalem Township Office of Community Development for technical assistance before initiating a funding request application.

Online Access

The Township will post draft copies and final copies of all documents covered by this Plan on its website accessible at: <https://www.bensalempa.gov/community-development1.html>

Other Engagement Techniques

The Plan may be amended as the Township continues to gain access to technology that improves the avenues of participation by its residents.

Contact Person

All communication regarding the Plan, the Analysis of Impediments to Fair Housing, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for people with disabilities, translation services, or other elements shall be directed to:

Mr. William Cmorey, Director
Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay
7-1-1).

In the Event of an Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the Township may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide an opportunity to comment where public comment is required to be heard. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the Township's website.

In the event of an emergency, the following alternatives may be instituted by the Township:

1. The public comment and display period for the Consolidated Plan and/or Annual Action Plan and any amendment thereto will be consistent with HUD's requirements.
2. Draft documents for public comment and review will be made available on the Township's website at <https://www.bensalempa.gov/community-development1.html>
Copies of the draft documents will be e-mailed upon request, if possible.

3. Public meetings may be held as virtual meetings using online platforms for public viewing with the option for real-time questions to be presented.
4. The Township may opt to hold one public hearing during the Consolidated Plan/Annual Plan process and its second required public hearing during the CAPER process for the same program year if a virtual hearing is not feasible.

C. The Citizen Participation Plan

Plan Development

The Township shall implement the following procedure when amending its Citizen Participation Plan.

a. Public Review of the Draft Plan

The draft Citizen Participation Plan will be made available for public review for a 15-day period prior to the consideration and adoption by the Bensalem Township Council and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Citizen Participation Plan will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

b. Public Hearing

The Township will conduct a public hearing to accept comments on the draft Citizen Participation Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

c. Comments Received on the Draft Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 15-day public review period.

d. Bensalem Township Council Action

Following the public hearing, the Plan will be presented to the Township Council for consideration and formal action. A summary of all written comments and those received orally during the public hearing, as well as the Township's responses to all written comments, will be attached to the Plan prior to submission to HUD.

e. Submission to HUD

The Plan will be approved as a stand-alone document and submitted to HUD with a summary of all written comments and those received orally during the public hearing as well as the Township's responses to written comments and proof of compliance with the 15-day public review and comment period requirement. A summary of any comments or views not accepted and the reasons for non-acceptance shall be supplied to HUD as well.

Amendments to the Approved Citizen Participation Plan

The Township shall follow the following procedure to amend its approved Citizen Participation Plan, as needed.

a. Amendment Considerations

The Township will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its HUD funded programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan be found by the Township to conflict with HUD regulations, or when changes in HUD regulations occur. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. Draft Amended Plan Review

The draft Amended Plan will be made available for public review for a 15-day period prior to the Township Council's consideration and adoption and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Amended Plan will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

c. Comments Received on Draft Amended Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 15-day public review period.

d. Public Hearing

The Township will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

e. Bensalem Township Council Action

Following the public hearing, the Plan will be presented to the Township Council for consideration and formal action.

f. Submission to HUD

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the Township's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Plan Access

The approved Amended Citizen Participation Plan will be kept on file at the

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

Hard copies can be made available to those requesting the approved Amended Plan by contacting the Township Contact Person, or a designee.

D. The Consolidated Plan (CP)

Plan Development

The Township will follow the process and procedures described below in the development of its Consolidated Plan (CP).

a. Stakeholder Consultation and Citizen Outreach

In the development of the CP, the Township will consult with other public and private agencies including, but not limited to, the following:

- Bensalem Township Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to non-White persons, families with children, the elderly, people with disabilities, people with HIV/AIDS and their families, homeless people, and other protected classes
- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities
- Broadband internet service providers and organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources
- Emergency management agencies.

When preparing the portion of the CP concerning lead-based paint hazards, the Township shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the Township will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the Township sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft CP and how to access a copy online for review and comment.

A variety of mechanisms may be utilized to solicit input from these people/service providers/agencies/entities. These include written letters, telephone or in-person interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

b. Public Hearings

The Township will conduct at least two public hearings in the development of the CP. The first public hearing will be conducted before the draft CP is published for public comment, during which the Township will address housing and community development needs, development of proposed activities, the amount of assistance

the Township expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the Township will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Analysis of Impediments to Fair Housing.

c. Potential Displacement of People

Although the Township does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of people and to assist any people displaced. When displacement is unavoidable on a temporary or permanent basis, the Township will comply with the federal Uniform Relocation Act.

Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the Township shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*. This resource is accessible online at http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/13780.

d. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of people as a result of funded activities, if any; plans to assist people actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; when the document will be considered for action by the Township Council; and, the anticipated submission date to HUD. Copies of the draft CP will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

In addition, the Township will make available a reasonable number of free copies of the draft document to residents and groups that request them.

e. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 30-day public display and comment period. The Township will consider any comments or views of Township residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

f. Bensalem Township Council Action

Following the public hearing, the CP will be presented to the Bensalem Township Council for consideration and formal action.

g. Submission to HUD

The CP will be submitted to HUD no less than 45 days before the start of the Township's five-year program cycle unless otherwise directed by HUD.

Revisions to the Consolidated Plan

The Township shall follow the following procedure to revise its CP, as needed.

a. Revision Considerations

There are two types of amendments that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When there is a change in the priorities identified in the CP

All other changes that do not meet the criteria defined above will be considered minor amendments and will not be subject to public comments. These changes will be fully documented and approved by the Township Council.

The Township may choose to submit a copy of each amendment to the CP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Township Council.

b. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by the Township Council, and the anticipated submission date to HUD. Copies of the draft Revised CP will be made available for review at the following locations:

Office of Community Development

2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

In addition, the Township will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 30-day public display and comment period. The Township will consider any comments or views of Township residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to HUD.

d. Bensalem Township Council Action

Following the public hearing, the Revised CP will be presented to the Township Council for consideration and formal action.

e. Submission to HUD

The Revised CP will be submitted to HUD within 30 days following the end of the public display and comment period.

In the Event of a Disaster

In the event of a local, state or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the Township's disaster response, the Township's requirements under this Plan will be streamlined to include:

- a. A 3-day public display and comment period to amend the CP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised CP.
- c. Following the public hearing, the Revised CP will be presented to the Township Council for consideration and formal action.
- d. The Revised CP will be submitted to HUD upon approval of the Township Council.

Plan Access

The revised plan shall be kept on file at:
Office of Community Development
2400 Byberry Road, Bensalem, PA 19020

And online at:

<https://www.bensalempa.gov/community-development1.html>

Hard copies can be made available to those requesting the Revised CP by contacting the Township Contact Person, or a designee.

E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the Consolidated Plan (CP), and it describes the Township's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the Township's method for distributing funds for specific projects; and, the geographic areas of the Township to which it will direct assistance.

Plan Development

The Township will follow the process and procedures described below in the development of its AAP.

a. Public Hearings

The Township will conduct at least two public hearings during the development of the AAP to obtain residents' views and to respond to proposals and questions. The first public hearing will be conducted before the AAP draft is published for public comment. During the first public hearing the Township will address housing and community development needs, development of proposed activities, the amount of assistance the Township expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit residents with low- and moderate-incomes, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the Township will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing consistent with the Assessment of Fair Housing.

b. Citizen Advisory Committee

The CDBG Advisory Committee will review all applications received and make funding recommendations to the Office of Community Development. Following the submission of applications to the Township, a review process is carried out whereby applications are ranked according to their quality and impact on people with low incomes. Such applications are then reviewed by the CDBG Advisory Committee composed of _____.

c. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by the Township Council, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

In addition, the Township will make available a reasonable number of free copies to residents and groups that request them.

d. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 30-day public display and comment period. The Township will consider any comments or views of Township residents received in writing, or orally at the public hearings, in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

e. Bensalem Township Council Action

Following the public hearing, the AAP will be presented to the Bensalem Township Council for consideration and formal action.

f. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the Township's annual program year.

Revisions to the Annual Action Plan

The Township shall follow the following procedure to revise its AAP, as needed.

a. Revision Considerations

There are two types of amendments that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When an eligible activity is added or deleted
- When a change occurs in the purpose, location, or beneficiaries of an activity previously approved
- When a 50 percent change in federal funding occurs where the project is \$25,000 or less
- When a 25 percent change in federal funding occurs where the project is more than \$25,000.

All other changes to funding allocations or approved eligible activities that do not meet the criteria defined above will be considered minor amendments and will not be

subject to public comments. These changes will be fully documented and executed by the Township Council. The Township may choose to submit a copy of each amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Township Council.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the draft revised AAP can be examined, how comments will be accepted, when the document will be considered for action by the Township Council, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

In addition, the Township will make available a reasonable number of free copies to residents and groups that request them.

c. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the Township Contact Person, or a designee, during the 30-day public display and comment period. The Township will consider any comments or views of Township residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

d. Bensalem Township Council Action

Following the public hearing, the Revised AAP will be presented to the Township Council for consideration and formal action.

e. Submission to HUD

The Revised AAP will be submitted to HUD within 30 days following the end of the public display and comment period.

In the Event of a Disaster

In the event of a local, state or federally declared disaster where program funds covered by this Plan may be expended to carry out eligible activities to address the Township's disaster response, the Township's requirements under this Plan will be streamlined to include:

- a. A 3-day public display and comment period to amend the AAP.
- b. A minimum of one public hearing shall be held to receive comments on the Revised CP.
- c. Following the public hearing, the Revised AAP will be presented to the Township Council for consideration and formal action.
- d. The Revised CP will be submitted to HUD upon approval of the Township Council.

Plan Access

The Annual Plan and any Revisions will be kept on file at:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020

And online at:

<https://www.bensalempa.gov/community-development1.html>

Hard copies can be made available to those requesting the Revised AAP by contacting the Township Contact Person, or a designee.

F. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

The Township shall follow the following procedure in the drafting and approval of its Consolidated Annual Performance and Evaluation Report (CAPER).

a. Report Considerations

The Bensalem Township Office of Community Development will evaluate and report the accomplishments and expenditures of the previous program year and draft the CAPER in accordance with HUD requirements.

b. Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. Public notice of the display and comment period will be published in the *CourierTimes* no less than two weeks before the period begins with accommodation for people with disabilities and non-English Spanish speakers in accordance with this Plan. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the following locations:

Office of Community Development
2400 Byberry Road, Bensalem, PA 19020
Phone: 215-633-3605
(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

c. Comments Received on the Draft CAPER

Written comments will be accepted by the Township Contact Person, or a designee, during the 15-day public display and comment period. The Township will consider any comments or views of Township residents received in writing while preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. Submission to HUD

The CAPER will be submitted to HUD within 90 days following the end of the Township's annual program year.

Plan Access

The CAPER will be kept on file at:

Office of Community Development

2400 Byberry Road, Bensalem, PA 19020

Phone: 215-633-3605

(TDD Users: PA Telecommunications Relay 7-1-1)

And online at:

<https://www.bensalempa.gov/community-development1.html>

G. Complaints

Residents may register complaints regarding any aspect of the HUD funded programs administered by the Bensalem Township Office of Community Development Block Grant program by contacting the Township Contact Person, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final Consolidated Plan, Annual Action Plan or other documents identified in this plan may send written objections to:

US Department of Housing and Urban Development
Philadelphia Regional Office
Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107

Objections should be made within 30 days after the Township has submitted the Consolidated Plan or other documents to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The Township's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the Township
- The application does not comply with the requirements of the CDBG program or other applicable laws
- The application proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.