

SECTION 5 – CITIZEN PARTICIPATION

A. Citizen Participation Plan

**NORTHERN MARIANAS HOUSING CORPORATION
COMMUNITY BLOCK DEVELOPMENT GRANT – DISASTER RECOVERY
CITIZEN PARTICIPATION PLAN**

Introduction: The Northern Marianas Housing Corporation (NMHC) is committed to providing opportunities for its citizens to participate in an advisory role in the planning, implementation, and assessment of its Community Development Block Grant-Disaster Recovery (CDBG-DR) Program. NMHC recognizes that those persons or groups affected by, or involved with projects under this program can provide meaningful assistance to those responsible for program implementation. In order to encourage and support the participation of citizens, NMHC will provide adequate information and give citizens the opportunity to comment. The exchange of information among citizens, NMHC staff, and elected officials will allow for a stronger, more responsive housing and community development effort in the Commonwealth of the Northern Mariana Islands (CNMI). The Citizen Participation Plan outlined here is distinctly separate from Citizen Participation Plans used within NMHC for programs such as the Community Development Block Grant (CDBG) Program, HOME Partnerships (HOME) Program, and the Emergency Solutions Grant (HESG). The requirements of the CDBG-DR Program are further listed within the Federal Register.

According to the Federal Register Notice 83 FR 40314:

“To permit a more streamlined process and ensure disaster recovery grants are awarded in a timely manner, provisions of 42 U.S.C. 5304(a)(2) and (3), 42 U.S.C. 12707, 24 CFR 570.486, 24 CFR 1003.604, and 24 CFR 91.115(b) and (c), with respect to citizen participation requirements, are waived and replaced by the requirements below. The streamlined requirements do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds.”

The goal of this citizen participation plan is to increase public involvement with respect to the recovery efforts associated with the CDBG-DR Program, which highlight the following aspects:

- ▶ The total amount of assistance to be provided
- ▶ Eligible Activities
- ▶ Quarterly Performance Reports
- ▶ Other Action Plan and program activities

Applicability

This Citizen Participation Plan details rules and procedures for public participation relating to any activity financed with CDBG-DR funding. The goal of this plan is to give all citizens the opportunity to participate in the distribution of CDBG-DR funds. It must encourage citizen participation in the development of an Action Plan, all substantial amendments to the Plan, and quarterly performance reports regarding the CNMI CDBG-DR Program. This plan conforms to the requirements of 83 FR 40314 and any special provision established by regulation in regards to CDBG-DR grants.

Action Plan

The CNMI CDBG-DR Action Plan details the comprehensive direction that the CNMI intends to pursue in response to the remaining unmet need within the CNMI. This plan gives the public a clear understanding of how the CDBG-DR funding is to be allocated. The Action Plan will be accessible to the public via the CNMI CDBG-DR website at www.cnmi-cdbgdr.com. All responses to this Action Plan will be addressed via (but not limited to) writing, via email, or in-person.

The most current and approved Action Plan along with substantial amendments will be posted on the CNMI CDBG-DR website. This version will give the public the opportunity to see the most recent version and avoid having to back-track through older versions.

Action Plan Amendments

Substantial Amendments are required when there is a change in program benefit/eligibility criteria, addition/deletion of an activity, or re-allocation of substantial amounts. A substantial amendment will also be required if any program changes exceed five million dollars (\$5,000,000.00). Substantial amendments must provide a reasonable opportunity (at least 30 days) for citizen comment. All changes will be documented by NMHC's CDBG-DR Program to provide both necessary and reasonable justifications. All substantial amendments will include the following:

- ▶ The exact identification of which content is being added, deleted or changed
- ▶ A clear description of where funds are moved from/to
- ▶ The updated and revised budget after re-allocation of funding

NMHC will notify HUD of any non-substantial amendments within five business days before it becomes effective. These changes will be listed and available for the public via the CNMI CDBG-DR website at www.cnmi-cdbgdr.com.

Quarterly Performance Reports

Quarterly Performance Reports are a requirement of the CDBG-DR Program. These reports detail the updated timelines of the CDBG-DR Program as a whole. They serve as the main avenue for HUD's monitoring process of the CNMI CDBG-DR grant. As a requirement of the CDBG-DR grant, all QPRs will be posted on the CNMI CDBG-DR website at www.cnmi-cdbgdr.com. Citizens will have the ability to comment on each QPR for 15 days.

Technical Assistance

NMHC will work with organizations and individual representatives of very low-, low- and moderate- income people including the elderly, persons with disabilities, and persons with limited English proficiency who are interested in submitting a proposal to obtain funding assistance under the CDBG-DR Program. NMHC will make available to potential applicants, upon request, copies of regulations related to eligible activities included in the CDBG-DR Action Plan. Staff will also provide guidance in the interpretation of the federal regulations, the strategies and objectives of the CDBG-DR Action Plan, and will provide referrals to other agencies, including HUD, when necessary. Receiving staff assistance does not guarantee that an applicant will receive funding.

Access to Information

All CNMI CDBG-DR Program related information such as action plans, action plan amendments, policies, procedures, quarterly performance reports, citizen participation requirements, program information, procurement listings, and contracts will be available via the CNMI CDBG-DR website at www.cnmi-cdbgdr.com. For those who do not have access to internet service, NMHC will provide hard copies of program information upon request. NMHC will provide technical assistance to those who need accessing the information through multiple avenues.

Notifying the public is of paramount importance as these funds are largely dependent on public participation and the remaining unmet need to be assessed. NMHC will utilize the following avenues to advertise and notify the public of the CDBG-DR Program:

- ▶ Notices in the local newspaper
- ▶ Radio announcements
- ▶ Letters to government agencies
- ▶ Social Media outlets
- ▶ The CNMI CDBG-DR website
- ▶ The Office of the Governor’s website
- ▶ Other applicable forms of communication

Citizens who have difficulty accessing the website can contact the CNMI CDBG-DR office via the following avenues:

- ▶ Telephone: (670) 233-9447
- ▶ Email: cnmi-cdbg-dr@nmhc.gov.net
- ▶ Physical copies will be available at:
 - › CDBG-DR Office – 3rd Floor of the Ladera Building, Chalan Laulau, Beach Road
 - › NMHC Tinian Field Office – Tinian, MP
 - › NMHC Rota Field Office – Rota, MP
- ▶ Physical copies can also be requested via mail:
CDBG-DR Office
P.O. Box 500514
Saipan, MP 96950

B. Publication and Public Notice

A public notice was published in the local papers of general circulation on June 19, 2020, providing for the required 30-day public comment period. Additionally, the plan was posted on NMHC’s official website at the following address (<https://www.nmhc.gov.net/default.asp?secID=3>). All future information will be included on the main CNMI CDBG-DR website at (<https://www.cnmi-cdbgdr.com>). The NMHC will make reasonable accommodations for persons with disabilities and non-English speaking residents upon request and in accordance with the Citizen Participation Plan. The aforementioned information was included in the Public Notice for a 30-day comment period. The 30-day public notice expired on July 20, 2020.

The Northern Marianas Housing Corporation will take reasonable steps to ensure very low-, low-, and moderate-income persons, including persons with disabilities, the elderly, and persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our CDBG-DR services, activities, programs and other benefits. The policy of NMHC is to ensure meaningful communication with interested clients. The policy also provides for communication of information contained in vital documents related but not limited to NMHC's CDBG-DR program, i.e., action plans, amendments to the action plan, citizen participation plans, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. The CNMI CDBG-DR website will be compliant with assistive screen reader technology to ensure accessibility for disabled clients going forward. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

The public will be informed through media outlets, paid advertisements, our CDBG-DR website, LEP notices, posters, and literature, as well as through outreach activities.

Procedures:

1. Identifying LEP Persons and Their Language

NMHC will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or “I speak cards,” available online at www.lep.gov) or posters to determine the language.

2. Obtaining a Qualified Interpreter

NMHC CDBG-DR Admin Staff will be responsible for:

- a. Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
- b. Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;
- c. Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person’s file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children and other clients/residents will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. Providing Written Translations

- d. When translation of vital documents is needed, each unit in NMHC CDBG-DR program will submit documents for translation into frequently-encountered languages to CNMI Chamorro-Carolinian Language Commission. Original documents being submitted for translation will be in final, approved form with updated and accurate legal information.
- e. Facilities will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.
- f. NMHC will set benchmarks for translation of vital documents into additional languages over time.

4. Providing Notice to LEP Persons

NMHC will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs will be posted and provided in intake areas and other points of entry at all three designated NMHC CDBG-DR program buildings (including the Tinian and Rota Field Offices) as well as on bulletin boards of government agencies and business establishments. Notification will also be provided through one or more of the following: outreach documents, telephone voice mail menus, local newspapers, radio and television stations, and/or community-based organizations.

5. Monitoring Language Needs and Implementation

On an ongoing basis, NMHC will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, NMHC will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from clients and community organizations, etc.

NMHC will conduct a regular review of the language access needs of the LEP population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

To further provide meaningful client access to the CDBG-DR Program and its services, program staff will conduct home visits, upon request, to accommodate the elderly and persons with disabilities, who are unable to physically visit NMHC due to their disability or lack of reliable transportation.

C. Consideration of Public Comments

CNMI will consider all written comments regarding the Action Plan. A summary of the comments is provided as an attachment to this document (Section 6 - D) and provides the CNMI response to each citizen and/or entities that commented or reviewed the Draft Action Plan.

D. Substantial Amendment

A substantial amendment is defined as a change in program benefit or eligibility criteria; the addition or deletion of an activity; or the allocation or reallocation of a monetary threshold specified by the grantee in its action plan. The

CNMI monetary threshold for a substantial amendment is any changes in Action Plan amounts that exceed \$5 million. Substantial amendments are changes to an Action Plan which require a 30-day public comment period. All amendments will be listed on the CDBG-DR website sequentially.

E. Non-substantial Amendment

Non-substantial amendments require notice to HUD at least 5 days prior to the amendment going into effect. They do not require notice to the Public on changes of \$5 million or less. All amendments will be listed on the CDBG-DR website sequentially.

F. Public Website

All relevant data is posted on the NMHC web page including a link for the Action Plan itself. The CNMI CDBG-DR program will have a stand-alone website (<http://www.cnmi-cdbgdr.com>), which will include the following:

- ▶ Home tab: Summarizes the CDBG-DR program
- ▶ Program tab: Lists all programs funded by the CDBG-DR Program
- ▶ Procurement tab: Lists all procurement activities
- ▶ Contracts tab: Includes all contracts procured as well as a summary of each contract
- ▶ Citizen Participation tab: Lists the CDBG-DR Participation plan, as well as contact details and job opportunities
- ▶ Action Plan tab: All Action Plan related items
- ▶ Reporting tab: Lists DRGR Quarterly Performance Reports as well as approved DRGR Action Plan
- ▶ Policies tab: Includes all CDBG-DR related policies and procedures

G. Waivers

NMHC will seek any waivers needed and/or that may be available or issued by HUD. NMHC has requested, on behalf of the CNMI, a Tourism Waiver Request. The purpose of this waiver is to allow the CNMI to use CDBG-DR funding for tourism marketing and investments in an effort to help restore the tourism industry, the CNMI's main economic driver.