



Version 1.0 | February 17, 2025

Citizen Participation Plan

Related to Use of U.S. Dept. of Housing and Urban Development (HUD)
Community Development Block Grant-Disaster Recovery (CDBG-DR) Funding
in Response to Hurricane Helene.

North Carolina Department of Commerce

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Revision History

Version	Date	Description
1.0	February 17, 2025	Initial policy creation

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1.0 General Citizen Participation and Public Comment

On January 16, 2025, the U.S. Department of Housing and Urban Development (HUD) allocated \$1.428 billion of CDBG-DR funding to the State to address unmet recovery needs arising from Hurricane Helene which struck the western portion of the State in September 2024. To engage the citizens of North Carolina, the North Carolina Department of Commerce (NCDOC) has developed this citizen participation plan to help inform the use of Community Development Block Grant – Disaster Recovery (CDBG-DR) funding. HUD requires that all CDBG-DR grantees have a citizen participation plan and the specific citizen participation requirements are generally prescribed in the Federal Register Notices that set forth the rules and requirements for CDBG-DR funding. In developing this plan, NCDOC has been guided by underlying statutory requirements, Federal Register Notices and applicable regulatory requirements. To any extent necessary, NCDOC will issue specific updates or alternate plans to comply with that guidance.

1.1 Overview and Encouragement of Citizen Participation

NCDOC is the administrator of CDBG-DR funds provided to the State by HUD in response to damage caused by Helene, a presidentially declared disaster (see FEMA designation [DR-4827-NC](#)). This funding is directed to NCDOC's long-term disaster recovery programs to address unmet needs arising from Hurricane Helene as described in the related [Action Plan for Disaster Recovery](#). With this funding, NCDOC and its partners will assist storm-impacted residents by providing services to restore housing and support communities damaged by Helene and to mitigate against damage due to future disasters.

NCDOC is committed to ensuring that North Carolinians and communities impacted by Helene are aware of available resources, have an opportunity for input, and have equal access to information about the programs available to assist in recovery and mitigation efforts. Through in-person meetings, virtual meetings, outreach events, online and traditional media, NCDOC requests public comments on plans, publicizes existing programs and changes to existing plans and programs, and conducts outreach efforts throughout the storm-impacted areas.

Overall, NCDOC seeks to encourage a community-driven process that engages the public as a key stakeholder in the planning and rebuilding process. In addition, Governor Josh Stein has established the Governor's Advisory Committee on Western North Carolina Recovery to obtain formal and informal public input from a diverse

array of affected people on strategies to address the needs of communities affected by Helene.

NCDOC values the input of impacted citizens, other stakeholders, and decision makers that represent the vulnerable communities affected by Helene or at risk for future flooding and storm damage. NCDOC requests input from all citizens, including low- and moderate-income (LMI) persons, racial/ethnic minorities, persons with disabilities, and persons with Limited English Proficiency. Note that specific programs implemented with CDBG-DR funding may have additional specific outreach and citizen participation responsibilities. In those instances, each program will adhere to the basic citizen participation requirements outlined below. To meet the public participation requirements applicable to the use of CDBG-DR grants, NCDOC commits to the processes described below for citizen participation, complaints, appeals, and the public notice period.

1.2 Citizen Participation and Outreach for Action Plans

For any CDBG-DR grant, HUD requires the creation and maintenance of an Action Plan that provides a strategy for the use of the disaster recovery funds. NCDOC invites and encourages citizen participation in the development of its Action Plans according to the regulatory requirements applicable to that allocation. **Pursuant to HUD's requirement, the Action Plan shall be provided for citizens, affected local governments, and other interested parties for comment for a period of not less than thirty (30) calendar days.**

Further, citizen participation is also sought during the Substantial Amendment process that will periodically occur as NCDOC alters the Action Plan to address emerging needs and adjust the program consistent with implementation outcomes. **Substantial Amendments are also subject to a thirty (30) calendar day period for public comment.**

At a minimum, Substantial Amendments must follow the public comment period timelines indicated in the table below. Substantial Amendment criteria include:

- A change in program benefit or eligibility criteria.
- The addition or deletion of an activity.
- A change in program allocation in excess of \$28.5 million (approximately 2% of the overall CDBG-DR Helene-related allocation from HUD).

NCDOC will perform outreach through various state and local stakeholders using a variety of techniques and will advertise opportunities for public comment on the draft

Action Plan and, ultimately, Substantial Amendments, on its website at www.commerce.nc.gov/recovery and if required, NCDOC will also hold public meetings or hearings in disaster-impacted areas or virtually if physical public meetings or hearings are not able to be held due to any reason.

1.3 Public Hearings, Public Notice, Comment Period, and Website

Before submitting the Action Plan or any Substantial Amendment to HUD for review and approval, NCDOC must publish the proposed plan or amendment for public comment for thirty (30) calendar days.

During the public comment period, NCDOC will hold three public hearings as required by HUD given the size of the allocation to NCDOC for Helene recovery efforts. The public hearing may be virtually (alone, or in concert with an in-person hearing). All in-person hearings will be held in facilities that are physically accessible to persons with disabilities. For both virtual and in person hearings, the times and locations of the hearings will be convenient to potential and actual beneficiaries, with accommodation for persons with disabilities and appropriate auxiliary aids and services to ensure effective communication, as specified in the State of North Carolina's [Reasonable Accommodation Policy](#) .

In accordance with CDBG-DR statutory and regulatory requirements, NCDOC has developed and will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. This website is accessible at <https://www.commerce.nc.gov/recovery>. The website gives citizens an opportunity to read draft Action Plans and to submit comments. The website is featured prominently on, and is easily navigable from, NCDOC's homepage.

Paper copies of the Action Plan and Substantial Amendments will be available in English upon request through email at Helene.recovery@commerce.nc.gov. Other accessibility needs, such as availability in a language other than English, are available upon request through email at Helene.recovery@commerce.nc.gov.

After the conclusion of the required comment period, all comments are reviewed and NCDOC provides responses to comments in a revised version of the Action Plan or Substantial Amendment. NCDOC's consideration of and response to all public comments can be reviewed in the Appendices of the Action Plan as posted on the NCDOC website after HUD approval of the Action Plan.

NCDOC will take reasonable measures to increase coordination, communication, affirmative marketing targeted outreach, and engagement with underserved communities and individuals, including persons with disabilities and persons with

limited English proficiency. In addition to Action Plans and all amendments, the NCDOC website includes the following information for citizen review:

- The current approved CDBG-DR Action Plan (once approved by HUD).
- Citizen participation requirements.
- Procurement policies and procedures.
- Current procurements for goods and services.
- Performance reports, such as Quarterly Performance Reports (QPR).
- Current contract agreements.
- A summary of all procurements.

1.4 Individuals with Limited English Proficiency (LEP)

Based on an analysis of LEP data within the impacted areas, NCDOC will provide the Action Plans, Substantial Amendments, and other essential program materials in both English.

NCDOC can provide both oral interpretation and written translation services to people at no cost and these services are available upon request. Meaningful and equal access to federally funded programs and activities is required by Title VI of the Civil Rights Act of 1964.

To communicate effectively with LEP individuals, NCDOC has developed a policy that govern when and how communication in languages other than English is developed, disseminated, and provided by NCDOC and its agents.

1.5 Individuals with Disabilities

NCDOC programs will be accessible to all people with disabilities and will operate in a manner that does not discriminate against or limit access to program services and benefits to persons with disabilities. To ensure that CDBG-DR funded programs are operating in compliance with Section 504 requirements of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), NCDOC will:

- Ensure that all facilities where clients will have face-to-face interaction with program staff are readily accessible and usable by people with disabilities.
- Assist program Intake Specialists/Case Managers in providing written and verbal communication to program applicants regardless of their disability or limited proficiency with the English language to include sign language, braille, interpreters, etc.
- Assist program Intake Specialists/Case Managers in completing home visits with applicants who are homebound or cannot access a recovery center as needed.

- Ensure that reasonable accommodation modifications to an applicant’s home are part of a program scope of work as applicable.
- Appropriately address any identified hearing, visibility, or mobility limitations of a program applicant and/or applicant’s household members as required by Section 504 and the Americans with Disabilities Act (ADA).
- Work with a disabled program applicant's designee who has power of attorney or any non-profit organization that is representing the applicant as needed.

In addition, NCDOC complies with Section 508 requirements that require accessibility to electronic and information technology for individuals with disabilities. NCDOC’s program management vendor assists with ensuring that all public communications, including its website, meet Section 508 requirements. The online materials will also be accessible for the visually impaired. NCDOC will ensure that all print, verbal, or electronic communications with the public regarding distribution of CDBG-DR funding and actionable information are simultaneously communicated to persons with disabilities and others with access and functional needs via qualified channels (i.e. ASL interpreters, open captions, Braille, large, high contrast print, formats accessible to screen readers, podcasts etc.) in an equitable, timely, and efficient manner. Information will be presented in an understandable manner, using plain language and identifying whom to contact for clarification or additional information. For more information on how people with disabilities can access and comment on the CDBG-DR program email Helene.recovery@commerce.nc.gov.

1.6 Response to Citizen Complaints

Complaints are statements received from citizens related to situations concerning NCDOC’s disaster recovery programs, Action Plans, substantial amendments, quarterly performance reports, or related to the unsatisfactory or unacceptable behavior of an NCDOC representative carrying out a disaster recovery program. Complaints will be referred to the appropriate NCDOC management staff to be researched and responded to within 15 working days, where practicable. Citizen complaints can be submitted via NCDOC staff at Helene.recovery@commerce.nc.gov.

Written complaints or grievances regarding accessibility and requirements under the Americans with Disabilities Act can be reported to NCDOC at Helene.recovery@commerce.nc.gov.

All subrecipients will be required to develop complaint procedures that align with the requirements set by NCDOC.

1.7 Response to Appeals

NCDOC will implement a standardized appeals process in response to written appeals received relative to a CDBG-DR program and will require subrecipients to adopt a similar process. Additional details on this process will be found at NCDOC's Appeals Policy Manual. Note that NCDOC does not have the authority to grant an appeal of a statutory or HUD-specified CDBG-DR requirement.

In programs that directly serve individuals, applicants or tenants, as applicable, such parties may appeal for a reversal or revision of a program determination that affects their eligibility and/or assistance as contingent on program policies.

1.8 Public Comments Contact Information

Public comments may be submitted using NCDOC's contact information as follows:

- Email comments to: Helene.recovery@commerce.nc.gov
 - Include the Action Plan or CDBG-DR in the subject line.
- Fax: (919) 715-0096
- Written comments may be mailed to:
 - North Carolina Department of Commerce (NCDOC)
 - Attn: CDBG-DR Public Comment
 - 4346 Mail Service Center
 - Raleigh, NC 27699-4346

1.9 Application Status

NCDOC is committed to sharing timely and accurate updates on applications to the multiple programs that take applications directly from recovering individuals and families. For all direct applicant service programs, applicants will be able to learn more about the status of their application through a phone call or email with their case manager. NCDOC will set up additional communication methods, including information on our website, once the implementation vendor has been selected.

Additional information on how applicants can learn more about the status of their application may be found in the program manual for the corresponding program directly serving applicants.

Some of NCDOC's programs do not interface with individual applicants directly. Instead, for those programs NCDOC will coordinate directly with the selected subrecipients, housing developers, public housing authorities, or other entities to review applications for funding and provide other updates to projects.

2.0 Fair Housing

The Fair Housing Act requires all grantees, partners, subrecipients, and/or developers whose capital projects are wholly or partially funded with federal assistance to certify that no person was excluded from participation in, denied the benefit of, or subjected to discrimination in any housing program or activity because of their age, race, color, creed, religion, familial status, national origin, sexual orientation, military status, sex, disability or marital status. NCDOC and its contractors shall ensure that no applicant is treated in any way that does not comply with the federal Fair Housing Act, the Civil Rights requirements of Title I of the Housing and Community Development Act, and the North Carolina Fair Housing Act (Chapter 41A of the North Carolina General Statutes). NCDOC has assigned staff who will ensure that: NCDOC programs affirmatively further fair housing; fair housing complaints are directed to HUD or other appropriate agency; and programs are administered in accordance with NCDOC's Fair Housing Plan.