

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Community Development Block Grant Mitigation (CDBG-MIT) Program

Citizen Participation Plan



7.0 CITIZEN PARTICIPATION PLAN

7.1 Overview

The NMHC is committed to providing opportunities for its citizens to participate in an advisory role in the planning, implementation, and assessment of its CDBG-MIT Program. The NMHC recognizes that those persons or groups affected by, or involve 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 stronger, more responsive housing and community development effort in the CNMI.

The purpose of this Citizen Participation Plan (CPP) is to allow residents the opportunity to inform the CDBG-MIT Action Plan and projects that will be funded with this grant. The design of this CPP aligns with the requirements listed in the applicable Federal Register Notices allocating funds for hazard mitigation.

Subsection V.A.3. of 86 FR 45838 reads: “To permit a more robust process and ensure mitigation activities are developed through methods that allow all stakeholders to participate and because citizens recovering from disasters are best suited to ensure that grantees will be advised of any missed opportunities and additional risks that need to be addressed....These revised requirements mandate public hearings...across HUD-identified MID areas and require the grantee to provide a reasonable opportunity (at least 45 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-MIT program, which highlight the following aspects:

- a. The total amount of assistance to be provided
- b. Eligible activities
- c. Quarterly performance reports
- d. Other Action Plan and program activities.

7.2 Goals

The goals of the CPP are to:

1. Provide for and encourage citizen participation, particularly of low- and moderate-income persons.
2. Ensure residents have reasonable and timely access to public meetings being held to receive input on the Action Plan, as well as clearly communicate to residents how to submit public comments on the Action Plan.
3. Ensure residents are notified of amendments to the Action Plan.

4. Provide residents with information about programs to be funded, how to meet national objectives and local needs, in addition to how decisions were made.

7.3 CNMI Citizen Participation Process

To facilitate public engagement, the NMHC will make the Action Plan and CPP available online at the CNMI CDBG-MIT program's website (<https://www.cnmi-cdbqdr.com/CDBG-MIT/>). The website will include the following:

- Summarizes the CDBG-MIT program
 - Includes the Action Plan, Action Plan Amendments, and DR Action Plan
- List of all programs and projects funded by the CDBG-MIT program
- Lists all procurement policies and activities
 - Includes notice of active procurements
 - Includes a list and summary of all contracts procured with CDBG-MIT funds
- Citizen Participation Plan
- List of CDBG-MIT policies and procedures, including:
 - Anti-Fraud, Waste, and Abuse Policy
 - Complaint and Appeals policy
- Public Meeting Notes
- Program Guidelines, including applications, required forms, and contact information

Updates to the website will be made regularly in alignment with any activity associated with the CDBG-MIT program and Action Plan. Any document created in support of the CDBG-MIT program will be added to the public website within 5 days of the final approval date.

7.3.1 Publication and Public Meetings

A public notice was published in the local CNMI newspapers for general circulation on January 26, 2022, providing for information on the February 11, 2022 release of the Initial Draft Action Plan and the required 45-day public comment period: February 11 – April 2, 2022. Additionally, the plan was posted on NMHC's official website at the following address (<https://www.nmhcgov.net/default.asp?secID=3>). All future information will be included on the main CNMI CDBG-MIT website at (<https://www.cnmi-cdbqdr.com/CDBG-MIT/>).

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 45-day comment period. The 45-day public notice commenced on February 11, 2022 and ended on April 2, 2021.

Based on its allocation amount under this CDBG-MIT grant and per 86 FR 45838, NMHC held two (2) virtual public hearings on February 9, 2022 (Pre-Release Public Meeting) and February 16, 2022 (Post-Release Public Meeting), respectively.

This protocol for public meetings during a 45-day Public Comment period will be followed for any additional, substantial amendments to the Action Plan.

7.3.2 Submitting Comments

Comments will be collected and responded to by the NMHC. Outside of the public meetings, comments will be accepted through:

- By email: cnmi-cdbg-dr@nmhcgov.net
- In person, during office hours at any of the NMHC offices located on Saipan, Tinian, and Rota
- By U.S. mail to: P.O. Box 500514 Saipan, MP 96950

CNMI will consider all comments regardless of the method of submission. A summary of the comments is provided as an attachment to this document and provides the CNMI response to each citizen and/or entities that commented or reviewed the Draft Action Plan.

7.4 Language Access

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-MIT 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- MIT 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-MIT 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-MIT website, LEP notices, posters, and literature, as well as through outreach activities.

7.4.1 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.

7.4.2 Obtaining a Qualified Interpreter

NMHC CDBG-MIT 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.

7.4.3 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 and made available in a format that is accessible for persons with disabilities as provided for in the Effective Communication requirements under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990. 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-MIT 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.

7.4.5 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-MIT 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.

7.5 Individuals with Disabilities

The NMHC is committed to the full inclusion of all members of the public in both community engagement as well as the implementation of CDBG-MIT projects and programs, without regard to disability or any other classification protected by state or federal law. NMHC will ensure that persons with disabilities are provided reasonable accommodations as it pertains to accessing the information and participation in CDBG-MIT activities. Any member of the public can contact NMHC by phone at (670) 234-6866|9447|7670 (Saipan); (670) 433-9213 (Tinian); or (670) 532-9410 (Rota), or by email at cnmi-cdbg-dr@nmhcgov.net for support to access information and services.