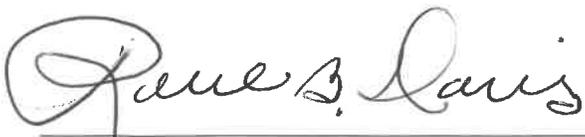


Nash County  
Program Compliance Plans and Policies  
2017 CDBG-DR

*(Also effective for any other funded CDBG program)*

This document approved by the Nash County Board of Commissioners on March 28, 2018.

A handwritten signature in cursive script that reads "Robbie B. Davis". The signature is written in black ink and is positioned above a horizontal line.

Robbie B. Davis, Chairman

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## Program Contact and Signature Policy:

The approved *Program Contact* shall be:

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

Any successors to this position shall be the approved *Program Contact*.

The County Manager shall be authorized to approve/sign the following:

- Administration & Program Management service contract
- Miscellaneous Service Delivery contracts
- Housing Rehabilitation contracts
- Floodplain Certification

The *Program Contact* shall be authorized to approve/sign the following:

- Miscellaneous correspondence with NC DEM
- Annual Performance Reports
- Quarterly, Monthly or other reports required by NC DEM
- Environmental Assessment and Release of Funds documents
- Compliance Plans and Policies revisions and updates
- Closeout Package information
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- Record Review Policy
- Complaint Procedure
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# Equal Opportunity Plan

## Nash County

### 2017 CDBG-DR

#### Program Contact:

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations*  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
[patsy.mcgee@nashcountync.gov](mailto:patsy.mcgee@nashcountync.gov)

#### Equal Employment Opportunity Plan

Nash County maintains the policy of providing equal employment opportunities for all persons regardless of race, color, religion, sex, national origin, handicap, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment.

Nash County prohibits any retaliatory action of any kind taken by any employee of the locality against any other employee or applicant for employment because that person made a charge, testified, assisted or participated in any manner in a hearing, proceeding or investigation of employment discrimination.

Nash County will strive for greater utilization of all persons by identifying previously underutilized groups in the workforce, such as minorities, women, and the handicapped, and making special efforts toward their recruitment, selection, development and upward mobility and any other term, condition, or privilege of employment.

Responsibility for implementing equal opportunities and affirmative action measures is hereby assigned to the *Program Contact* to assist in the implementation of this policy statement.

Nash County will develop a self-evaluation mechanism to provide for periodic examination and evaluation. Every 2 years the program will present a report to the CEO reporting on the progress of EEO and any affirmative actions. The Nash County will maintain this information in the program files and provide to DWI as needed.

Nash County will place the EHO logo on employment outreach, publications, posters, outreach and applicable distributions.

Nash County is committed to this policy.

Nash County will include the EEO logo and/or a phrase affirming EEO on all CDBG documents the program will share with local staff of the public.

Nash County will secure a contractual obligation contractors will not discriminate against any employee or applicant for employment due to race, color, religion, sex or national origin.

Nash County will secure a contractual obligation contractors will take affirmative action to ensure employees and applicants for employment will be treated without regard to race, color, religion, sex or national origin. Such actions may include but are not limited to employment promotion, demotion, transfer; recruitment or recruitment advertising; layoff or termination; pay rates or other compensation; and selection for training including apprenticeship. This obligation shall also all solicitations or advertisements for employment state all qualified applicants will receive consideration without regard to race, color, religion, sex, or national origin.

#### Equal Housing Opportunity Plan

Reference:

Civil Rights Act of 1964,  
Fair Housing Act, and  
Executive Order 12892, Equal Opportunity in Housing

Nash County will, to the greatest extent possible, eliminate housing discrimination and achieve diverse, inclusive communities by the enforcement, administration, and public understanding of fair housing laws and policies.

Nash County will post Equal Housing Opportunity posters and/or additional information in public buildings and other public places.

Specific activities proposed to secure public understanding and responsibilities for Equal Housing Opportunity are listed in the Fair Housing Plan quarterly activities.

*HUD PORTAL EEPP: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp)*

**Section 3 Plan - Local Jobs Initiative**  
**Local Economic Benefit for Low- and Very Low-Income Persons**  
**Nash County**  
**2017 CDBG-DR**

*Program Contact:*

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

**APPLICATION AND COVERAGE OF PLAN**

Nash County will endeavor to provide opportunities for training and employment for lower income residents of the CDBG-I project area and award contracts for work in connection with 2017 CDBG-DR to business concerns located or owned in substantial part by persons residing in the Section 3 covered area. Therefore Nash County, has developed the following Plan:

Nash County will comply with all applicable provisions of Section 3 of the HUD Act of 1968, as amended (24 CRF Part 135), all regulations issued pursuant thereto by the HUD Secretary, and all applicable rules and orders of the Department issued thereunder

This Section 3 covered project area for the purposes of this grant program shall include Nash County and portions of the immediately adjacent area.

Nash County will be responsible for implementation and administration of the Section 3 plan. Nash County will follow this Section 3 Plan to provide increased opportunities for local residents and businesses

This Section 3 Plan shall apply to services needed in connection with the grant including, but not limited to, businesses in the fields of planning, consulting, design, building construction/renovation, maintenance and repair, etc.

Nash County will identify suppliers, contractors, or subcontractors located in the Section 3 area when in need of a service. Resources will include NC Department of Administration Minority Business Directory, local directories, SBA local offices and word of mouth.

Nash County will include this plan in all contracts executed under 2017 CDBG-DR. Where necessary, listings from any agency noted above deemed shall be included as well as sources of subcontractors and suppliers. The Section 3 Plan shall be mentioned in the pre bid meetings and preconstruction meetings.

Nash County will require the prime contractor selected for major public works facility or public construction work submit a Section 3 Plan which will outline work needs in connection with the project and refer the Contractor to the local Employment Security Commission office should a need exist to hire any additional personnel.

Nash County will require the contractor for any housing rehabilitation contract in excess of \$100,000 submit a Section 3 Plan will outline the work needs in connection with the project.

Nash County will develop a listing of jobs, supplies and contracts likely to be utilized during 2017 CDBG-DR prior to any construction and related contracting, major purchases, or hiring, advertise the pertinent information as outlined below, and provide information the same information to DWI (for additional outreach). *Nash County will make a best faith effort to meet the DWI required Section 3 minimum numerical goals and will provide an explanation and describe efforts to meet the DWI required Section 3 goals in the Annual Section 3 report submitted with the APR during the life of the grant.*

Section 3 minimum goals:

- 30% of the aggregate number of new hires shall be Section 3 residents
- 10% of the total dollar amount of all covered construction shall be awarded to Section 3 business concerns
- 3% of the total dollar amount of all covered non-construction contracts shall be awarded to Section 3 business concerns

A Section 3 business concern is defined as a business where:

- 51% or more of the business is owned by a Section 3 resident, or
- 30% or more employed staff are Section 3 residents, or
- 25 % of subcontracts are committed to Section 3 businesses

**AFFIRMATIVE ACTIONS FOR RESIDENT AND BUSINESS PARTICIPATION**

*Nash County will take the following steps to assure low income residents and businesses within the 2017 CDBG-DR project area and within Nash County are used whenever possible.*

Maintain a list of qualified residents and businesses and notify persons on the list of any upcoming contracting and service opportunities

Divide total requirements into smaller tasks or quantities to permit maximum participation by Section 3 residents and businesses where economically feasible

Where feasible establish delivery schedules to allow participation of Section 3 residents and businesses

Place a display advertisement in the local newspaper containing the following information:

- A brief description of the project
- A listing of jobs, contracts and supplies likely to be utilized in carrying out the project.
- An acknowledgement that under Section 3 of Housing and Community Development Act, local residents and businesses will be utilized for jobs, contract and supplies in carrying out the project to the greatest extent feasible.
- A location where individuals interested in jobs or contracts can register for consideration
- A statement all hiring will be done through the local office of the North Carolina Employment Security Commission
- A statement all contracts will be listed with the North Carolina Division of Purchase and Contracts
- A statement potential employees and businesses may seek development and training assistance through local educational institutions

Refer Section 3 individuals and business to the local community college, JTPA and other available job training and technical assistance programs provided in the local community for low income residents requiring job training skills.

Post the Section 3 Plan on the public notice bulletin board other appropriate local public places.

Utilize lower income area residents as trainees and employees to the greatest extent feasible,

Encourage public works and rehabilitation contractors to hire local area residents

Encourage all contractors to subcontract with local Section 3 businesses

Encourage all contractors to purchase supplies and materials from local merchants

### **RECORDS AND REPORTS**

Nash County will maintain and furnish records, accounts, and reports as required under the Section 3 regulations, and permit authorized representatives of DWI, and federal agencies access to books, records, and premises for purposes of investigation in connection with a grievance or to ascertain compliance with this Section 3 Plan.

Nash County shall report to DWI Section 3 numbers annually using form HUD 60002 in the Annual Performance Report.

### **MONITORING COMPLIANCE**

Nash County will require each applicable contractor provide a Section 3 Plan, and will monitor compliance during the performance of the work, and maintain copies of all advertisements, notices, and published information necessary to document implementation of this Plan.

### **COMPLAINTS CONTACT**

Any complaints involving this Section 3 Plan should be directed to the *Program Contact*.

HUD PORTAL SECTION 3:

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/section3/section3](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/section3/section3)

# Procurement Standards

## Nash County

### 2017 CDBG-DR

The *Program Contact* for this program is listed below.

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations*  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
[patsy.mcghee@nashcountync.gov](mailto:patsy.mcghee@nashcountync.gov)

Nash County will accomplish procurement of all goods and services in accordance with these Procurement Standards. As applicable, Nash County shall follow the procurement standards contained in 2CFR Part 200 and 24 CFR 570.489(g) and the NC General Statutes which apply to procurement. When Federal and State regulations differ, the more restrictive regulations will apply.

Nash County will adhere to the following guidelines for federal funds programs:

- Nash County will follow OMB Circular A 87 to verify cost reasonableness when procurement is based on one bid or proposal and contact the State agency before awarding contracts on the basis of non-competitive negotiation.
- Nash County will include underutilized businesses, women owned businesses, and minority owned business on lists of bidders or professional service providers and solicit proposals and/or bids when such entities are a potential source of competition for goods and services.
- Nash County will develop a scope of work, a description of tasks, time requirements, fee proposal requirements, written selection procedure for all competitive negotiation procurements, will evaluate proposals based on the best interest of the local government and will award on the basis of the written selection procedures without cost as the sole or most important selection factor.
- Nash County will verify the contractor's eligibility to participate in federally funded programs prior to award of any contract.
- Nash County will evaluate proposals and/or bids and shall adhere to all Federal, State and local laws which involve conflict of interest laws, regulations and/or policies.
- Nash County will check references of bidders and/or proposers as appropriate.
- Nash County will require a written warranty for all small purchase goods and services
- Nash County will not contract any work on a contingency basis, cost plus basis or percentage of cost basis.

### **Code of Conduct**

This Code shall govern the performance of officers, employees, and agents engaged in the award and administration of contracts supported by Federal funds.

No employee, officer or agent of Nash County shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

1. The employee, officer or agent,
2. Any member of his immediate family,
3. His or her partner, or
4. Any organization which employs or is about to employ any of the above has a financial or other interest in the firm selected for award.

Officers, employees or agents shall neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to sub-agreements.

Nash County, at its discretion may make determinations of minimum rules where financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.

All violations of these standards deemed by the Governing Board of to be in excess of minimum levels determined above., will result in penalties, sanctions or disciplinary action as required by State and Local laws and regulations or as deemed appropriate by the Nash County Board of Commissioners.

# Language Access Plan

## Nash County

### 2017 CDBG-DR

*Providing meaningful communication with persons with limited English proficiency*

*The purpose of this Policy and Plan is to ensure compliance with Title VI of the Civil Rights Act of 1964, and other applicable federal and state laws and their implementing regulations with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the ground of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.*

The *Program Contact* for this program is listed below.

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

#### **POLICY:**

Nash County will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in benefits and services for which such persons qualify in order to avoid discrimination on the grounds of national origin, all programs or activities administered by Nash County.

#### **DEFINITIONS:**

***Limited English Proficient (LEP) individual*** – Any prospective, potential, or actual recipient of benefits or services from Nash County who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with health care providers and social service agencies.

***Vital Documents*** – These forms include, but are not limited to, applications, consent forms, all compliance plans, bid documents, fair housing information, citizen participation plans, letters containing important information regarding participation in a program; notices pertaining to the reduction, denial, or termination of services or benefits, the right to appeal such actions, or that require a response from beneficiary notices advising LEP persons of the availability of free language assistance, and other outreach materials.

***Title VI Compliance Officer:*** The person or persons responsible for administering compliance with the Title VI LEP policies. For the purposes of this program this position shall be filled by the *Program Contact*.

***Substantial number of LEP:*** 5% or 1,000 people, whichever is smaller, are potential applicants or recipients of the agency and speak a primary language other than English and have limited English proficiency.

#### **IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

Nash County will promptly identify the language and communication needs of the LEP person. Staff will use a language identification card (or "I speak cards," <http://www.lep.gov/resources/ISpeakCards2004.pdf>) and LEP posters to determine the language. In addition, when records are kept of past interactions with individuals or family members, the language used to communicate with the LEP person will be included as part of the record.

### **OBTAINING A QUALIFIED INTEPRETER**

Nash County will use the methods checked below to obtain a qualified interpreter:

Maintaining an accurate and current list showing the language, phone number and hours of availability of bilingual staff

Contacting the appropriate bilingual staff member to interpret, in the event an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;

Obtain an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language. Maria Andrews and Kathy Rafferty are local resources who can provide phone interpretation for Spanish and seven other commonly used languages

Other: Nash County will secure online interpreter services which are readily available when needed

Nash County will provide all pertinent staff who may have direct contact with LEP individuals with a copy of this policy and procedure, and will train staff who may have direct contact with LEP individuals in effective communication techniques including the effective use of an interpreter.

Family members or friends of the LEP person will not be used as interpreters unless specifically requested by the LEP person and only after the LEP person understands an independent interpreter is available at no charge to the LEP person. If the LEP person chooses a family member or friend as an interpreter, Nash County will consider issues of competency, confidentiality, privacy and conflict of interest. If the LEP selected interpreter is not competent or appropriate for any of these reasons, Nash County will provide competent interpreter services.

Nash County will not allow children and other residents to interpret, in order to ensure confidentiality of information and accurate communication

### **PROVIDING WRITTEN TRANSLATIONS**

- Nash County will set benchmarks for translation of vital documents into additional languages.
- When translation of vital documents is needed, Nash County will submit documents for translation into frequently-encountered languages.
- Nash County 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.

### **PROVIDING NOTICE TO LEP PERSONS**

Nash County will inform LEP persons of the availability of language assistance by providing written notice in languages LEP persons will understand and provide all interpreters, translators and other aids needed to comply with this policy with CBDG funds and at no cost to the LEP individuals. Nash County will notify the LEP individual and their families of the availability of assistance free of charge and will post notices and signs at intake areas and points of entry such as main lobbies and waiting rooms. Nash County will also provide

notification through outreach documents, public places postings, local newspapers, other local media, or community based organizations.

### **MONITORING LANGUAGE NEEDS AND IMPLEMENTATION**

Nash County will assess changes in demographics and changes in the types of services needed due to demographic changes and will assess the effectiveness of procedures contained in this Plan, the mechanisms needed for securing interpreter services, complaints filed by LEP individuals, feedback from residents and community organizations, etc.

#### ***Compliance Procedures, Reporting and Monitoring***

**Reporting:** Nash County will complete an annual compliance report and send this report to DWI.

**Monitoring:** Nash County will complete a self-monitoring report on a quarterly basis, using a standardized reporting system proposed by the local government. These reports will be maintained and stored by the Title VI Compliance Officer and will be provided to the DWI upon request.

The agency will cooperate, when requested, with special review by the DWI.

#### ***Applicant/Recipient Complaints of Discriminatory Treatment***

**Complaints:** Nash County will provide assistance to LEP individuals who do not speak or write in English if they indicate that they would like to file a complaint. A complaint will be filed in writing, contain the name and address of the person filing it or his/her designee and briefly describe the alleged violation of this policy. The form can be found at <http://www.nccommerce.com/rd/community-assistance/investment-assistance/forms-resources/compliance-plans-and-templates/limited-english-proficiency>. Nash County will maintain records of any complaints filed, the date of filing, actions taken and resolution and will notify DWI of complaints filed, the date of filing, actions taken and resolution within 30 days of resolution.

**Resolution of Matter:** If Nash County cannot resolve a complaint by informal means, Nash County will inform the LEP individual, in their primary language of their right to appeal further to DWI. The DWI Compliance Office will conduct an investigation of the allegations of the complaint and will afford all interested persons and their representatives an opportunity to submit evidence relevant to the complaint. The investigation will not exceed 30 days, absent a 15-day extension for extenuating circumstances. If the investigation indicates a failure to comply with the Act, the local unit of government, agency Director or his/her designee will so inform the recipient and the matter will be resolved by informal means whenever possible within 60 days. If the matter cannot be resolved by informal means, then the individual will be informed of his or her right to appeal further to the Department of Justice. This notice will be provided in the primary language of the individual with Limited English Proficiency. If not resolved by DWI, then complaint will be forwarded to Department of Justice (DOJ), Department of Housing and Urban Development (HUD) Field Office.

HUD PORTAL LEP:

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/promotingfh/lep-faq](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq)

# CITIZEN PARTICIPATION PLAN

## Nash County 2017 CDBG-DR

### Program Contact:

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations*  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
[patsy.mcghee@nashcountync.gov](mailto:patsy.mcghee@nashcountync.gov)

### INTRODUCTION

Nash County has developed a Citizen Participation Plan to comply with requirements of the CDBG-I program as administered by DWI and HUD. Citizens are encouraged to participate in all stages parts of the CDBG process.

### SCOPE OF PARTICIPATION

Nash County will make reasonable efforts to provide for citizen participation throughout the process to include but not limited to identification and assessment of CDBG needs and changes to any approved CDBG program. Nash County will conduct all phases of the CDBG process in an open manner, provide full access to all public program information, and encourage citizens to participate at all phases of the CDBG process.

### CITIZEN PARTICIPATION CONTACT PERSON

Nash County has designated the *Program Contact* listed above to monitor all matters involving citizen participation activities. The Program Contact shall ensure the following activities take place.

- Dissemination of information concerning proposed projects and current project activities
- Coordination of groups which may be participating in the community development process
- Receipt of written comments and informal ideas and comments and transmitting information on to appropriate officials or staff
- Monitor the overall citizen participation process and recommend Plan revisions as needed

Citizens may contact the *Program Contact* during regular business hours at the address and/or phone number first listed above.

### TECHNICAL ASSISTANCE

Nash County staff shall provide technical assistance upon request to individuals or groups as needed to adequately provide for citizen participation in all phases of the CDBG program. Technical assistance may include but not be limited to the following.

- Interpret CDBG program rules, regulations, procedures and/or requirements
- Provide information and/or materials concerning the CDBG program
- Assist low-moderate income citizens communicate views and needs statements and develop activity proposes to addresses stated needs

Citizens should contact the *Program Contact* to coordinate Technical assistance activities.

## **PUBLIC HEARINGS**

Nash County will conduct public hearings to allow citizens to voice opinions and offer proposals concerning CDBG programs. Local officials will respond to non-complaint questions and proposals from citizens at each public hearing. Local officials will respond to any complaint questions and comments through the approved Complaint Procedure. Citizens may also voice opinions and offer proposals during the public comment agenda item at any regularly scheduled meeting.

### ***Public Hearing Times and Locations***

Nash County will conduct public hearings as follows with respect to time and location at a:

- locations accessible to all citizens, especially LMI persons
- convenient times
- locations which provide adequate access for citizen participation
- locations accessible to persons with disabilities
- locations other than the routine location if adequately publicized in the public hearing notice.

### ***Application Public Hearing***

Nash County will conduct one public hearing prior to submission of a funding request application and may present multiple applications at one hearing. The purpose of the public hearing will be as follows.

- Assess community needs and problems
- Discuss items regarding community development needs, the CDBG program, and the application process
- Entertain proposals and comments from citizens
- Present activities selected for an application for public comment and review
- Solicit public comment concerning activities proposed for an application

Nash County will provide the following information at a public hearing.

- goals and objectives of the CDBG program
- total amount of CDBG funds available in the application intake round and fiscal year
- role of the public in program planning, implementation and assessment
- eligible activities
- application development process
- statement all funds will be used to benefit LMI people
- projects proposed for submission to include activities
- schedule of meetings and hearings
- locations where the public can review applications
- programs/activities funded through previous CDBG approved applications
- an identification of projects which could result in relocation of residences or businesses and what actions will be taken if such relocation is necessary
- contact information of complaints or grievances
- projects proposed for submission to include activities, location, estimated cost, local match, project impact especially for LMI persons, and application submittal date

Nash County may conduct a community meeting in addition to the public hearing to solicit comments prior to submission of the proposed or other applications.

### ***Amendment Public Hearings***

Nash County will hold one public hearing for all formal amendments which require approval of the funding agency and involve changes in dollars spent on any activity, changes in program beneficiaries, changes in location of activities, changes in project activities and require approval of the funding agency. Nash County will receive public input for any changes or amendments not requiring approval of the funding agency at its regular scheduled meetings.

### ***Assessment of Performance Public Hearings***

Nash County will hold one public hearing at the conclusion of every CDBG project to allow public comment on the performance of local officials, local staff, consultants, engineers, contractors and the actual use of CDBG funds. The hearing will also solicit performance in addressing community development needs, goals and objectives. Nash County will conduct this hearing prior to submitting the final Annual Performance Report and other closeout documents

### ***Additional Hearings***

Nash County may conduct additional public hearings to inform the public and solicit public input. Such hearings will comply with the other requirements of this Plan.

### ***Limited English Proficiency Citizens***

Nash County will take all reasonable actions necessary, to include an interpreter and/or materials in the appropriate language or format, to allow LEP citizens to participate in the community development process.

### ***Public Hearing Notice***

Nash County will provide notice of all public hearing in the non-legal section of a newspaper of local circulation at least 10 days and not more than 25 days prior to the hearing. The notice shall include the time, date, and location of the hearing along with items proposed for discussion.

### ***Accessibility to Low and Moderate Income Persons***

Nash County may take additional steps to promote participation by persons or groups which may otherwise be excluded. Additional steps may include but are not limited to posting of notices in LMI neighborhoods or places frequented by LMI persons, holding public hearing in LMI neighborhoods or holding public hearings in areas proposed for CDBG project activities.

### ***Accessibility to Persons with Disabilities***

Nash County will make the following provisions when the *Program Contact* is notified of the need for accessibility a minimum of 48 hours prior to the hearing.

- Sign language interpreter for the hearing impaired
- Qualified reader for the visually impaired
- Reasonable accommodations for persons with mobility or developmental disabilities

### **PROGRAM INFORMATION**

Nash County will keep all documents related to the CDBG program in the office of the *Program Contact* and make CDBG program information available to the public, especially the LMI and LEP populations. The public may examine or duplicate available information in accordance with the Record Review Policy and available information will include but not be limited to information surrounding Grant Contract and condition release details, Program Plans & Policies, public hearing minutes, miscellaneous correspondence, environmental review record, procurement records, financial information, service Agreements, construction contract documents, Davis-Bacon compliance, performance reports, evaluation reports, other required reporting, CDBG applications, miscellaneous correspondence, and written complaints or comments with responses where applicable.

Nash County will have appropriate information available at the regular scheduled meetings when the CDBG program is discussed.

Nash County shall not disclose any program beneficiary financial status information of any information which may, in the opinion of the CEO confidential in nature.

## **PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS**

Any citizen or citizen's group desiring to comment, object or have a complaint during any phase of a CDBG application or program, should submit such comments, objections, or complaints in writing to the *Program Contact*. The Nash County shall respond in writing to any written comment, objection or complaint within 15 working days and will attempt to resolve the comment, objection or complaint.

Citizens are encouraged to attempt to resolve issues at the local level. However, if citizen feels the Nash County has not adequately addressed the comment, objection or complaint, the citizen may submit the comment, objection or complaint in writing to NC DEM-DWI or HUD at the following address.

NC Department of Public Safety  
Division of Emergency Management  
4238 Mail Service Center  
Raleigh, North Carolina 27699-4238

Or:

U.S. Department of Housing and Urban Development  
Community Planning and Development Division  
Greensboro Field Office  
1500 Pinewood Road  
Greensboro, NC 27407

Nash County will maintain records of comments, objections and/or complaints by citizens along with resolution efforts and will be made available for review in accordance with the Record Review Policy.

## **AMENDMENTS**

Nash County will periodically evaluate this Citizen Participation Plan to insure this Plan is effectively allowing Citizen Participation in the CDBG process and program and make revision as needed.

# Recipient's Plan to Further Fair Housing

## Nash County

### 2017 CDBG-DR

***Program Contact:***

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

Indicate if the Recipient will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.

First Time  Past Activities

Identify and analyze obstacles to affirmatively furthering fair housing in recipient's community.

*Lack of knowledge among citizens of fair housing laws*

Will the above activities apply to the total municipality or county?

Yes  No

*Listed below the quarterly activities the grant recipient will undertake over the active period of the grant to affirmatively further fair housing in their community to include an estimated cost of each activity.*

<b><i>Quarterly Fair Housing Activity</i></b>	<b><i>Months</i></b>	<b><i>Year</i></b>	<b><i>Estimated Cost</i></b>	<b><i>Actual Cost</i></b>
Place or Ensure Fair Housing Posters and similar notices are in placed in the Nash County Administrative office.	Apr-June	2018	\$70	
Publish a Fair Housing Complaint Procedure.	July-Sept	2018	\$175	
Publish a General Fair Housing Information Notice.	Oct-Dec	2018	\$175	
Deliver Fair Housing information concerning general fair housing law and complaint process to the business contact, lay leader group, and/or minister of three local churches with a request to help increase the congregation's awareness and understanding of fair housing issues.	Jan-Mar	2019	\$70	
Place Fair Housing handouts in the Nash County Administrative office.	Apr-June	2019	\$70	
Deliver Fair Housing information concerning general fair housing law and complaint process to local executive and/or head of the loan department of local lending institutions to help increase the institution's awareness and understanding of fair housing law as it relates to the local lending market.	July-Sept	2019	\$70	
Place Fair Housing handouts and posters in the local library, post office, and/or Social Services office.	Oct-Dec	2019	\$70	

Deliver Fair Housing information concerning general fair housing law and complaint process to the manager of local real estate offices to help increase the realtor's awareness and understanding of fair housing law as it relates to the local housing market.	Jan-Mar	2020	\$70	
Restock/place Fair Housing handouts in the Nash County Administrative Office	Apr-June	2020	\$70	
Deliver Fair Housing information concerning general fair housing law and complaint process to the manager of local property management offices to help increase the property manager's awareness and understanding of fair housing law as it relates to the local rental housing market.	July-Sept	2020	\$70	
Deliver Fair Housing information concerning general fair housing law and complaint process to the business contact, lay leader group, and/or minister of three local churches not already receiving this information with a request to help increase the congregation's awareness and understanding of fair housing issues.	Oct-Dec	2020	\$70	
Restock Fair Housing handouts in the local library, post office, and/or Social Services office	Jan-Mar	2021	\$70	
Insure Fair Housing posters are in place in the Nash County administrative office and other locations receiving posters during the execution of this Fair Housing Plan	Apr-June	2021	\$70	

Nash County will conduct one community outreach activity which includes a fair housing discussion prior to June 2021 in the form of a workshop, public forum, fair housing information booth, fair housing fair, or similar event. This activity will serve as the quarterly activity in lieu of the above listed activity for the respective quarter.

**Describe recipient's method of receiving and resolving housing discrimination complaints**

- Any person or persons wishing to file a complaint of housing discrimination may do so by informing the *Program Contact* of the facts and circumstance of the alleged discriminatory acts or practice.
- The *Program Contact* shall acknowledge the complaint in writing within 10 calendar days after receipt of the complaint and inform NC DEM-DWI and the NC Human Relations Commission of the complaint.
- The *Program Contact* shall offer assistance to the Commission in the investigation and reconciliation of all housing discrimination complaints which are based on events occurring in Nash County
- The *Program Contact* shall publicize in the local newspaper who is the local contact to contact concerning housing discrimination complaints. Publications will include TDD (711 – Relaync.com).

HUD PORTAL FH: [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp)

# Excessive Force Policy

## Nash County

### 2017 CDBG-DR

Program Contact:

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

Nash County hereby adopts an Excessive Force Policy that is in accordance with the applicable State of North Carolina and Federal Regulations, i.e., Section 519 of Public Law 101-144, (1990 HUD Appropriations Act) requiring units of government receiving CDBG funds to adopt and enforce *Excessive Force Provision*. Nash County, as the recipient of Federal and/or State CDBG-I Grant Funds, acknowledges its responsibility to and will adhere to the aforesaid NC State and Federal Excessive Force Regulations. More particularly, Nash County adopts and will enforce a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any and all individuals engaged in non-violent civil rights demonstrations, and is adopting and will enforce a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within the Nash County.

# RESIDENTIAL ANTI-DISPLACEMENT & RELOCATION ASSISTANCE PLAN

## Nash County 2017 CDBG-DR

### Program Contact:

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

Nash County has prepared this Residential Anti-displacement & Relocation Assistance Plan in accordance with the Housing and Community Development Act of 1974, as amended; and HUD regulations at 24 CFR 42.325 and applies to all current CDBG projects.

### **Minimize Displacement**

Nash County will take the following steps to minimize the direct and indirect displacement of persons from their homes as a result of 2017 CDBG-DR:

- Assist family units temporarily displaced by 2017 CDBG-DR to locate temporary housing locations and provide Optional Coverage Plan financial assistance through the grant program.
- Make all reasonable efforts to select design and construction alternatives which will minimize demolition of occupied and vacant occupiable housing units.

### **Relocation Assistance to Displaced Persons**

Nash County will provide Relocation assistance for any family unit involuntarily and permanently displaced as a result of 2017 CDBG-DR. Relocation assistance will be as outlined in the URA and regulations at 49CFR24 or section 104(d) as appropriate for the family units and shall be funded with 2017 CDBG-DR program funds.

### **One-for-One Replacement of Lower-Income Dwelling Units**

*Nash County does not anticipate the demolition or conversion of lower-income housing units or the permanent, involuntary displacement of any family units. However, the Nash County will take the following actions if these unanticipated situations occur.*

Nash County will replace all occupied and vacant occupiable lower-income dwelling units demolished or converted to a use other than lower-income housing in connection with a Grant in accordance with 24 CFR 42.375.

Nash County will make public by posting at three public local locations the information listed below before entering into a contract which will provide funds to demolish or convert lower-income to other uses.

1. A description of the proposed assisted project
2. The address, number of bedrooms, and location on a map of the affected housing units
3. A time schedule for the demolition or conversion

4. The number of dwelling units needed by size (number of bedrooms), location, source of funding and time schedule for the replacement lower-income housing
5. The basis for concluding each replacement dwelling unit will remain a lower-income dwelling unit for at least 10 years after the date of initial occupancy
6. If applicable, information demonstrating replacement unit of a different size than original existing is appropriate with the HUD approved Consolidated Plan and 24 CFR 42.375(b)

If the information contained in items 4-6 is not known at the time of demolition, the Nash County will identify the general location of the dwellings on a map and publicize the remaining information as soon as the information is available.

**One-for-One Waiver Request**

Nash County may request NC DEM waive the one-for-one requirement based on the fact an adequate supply of standard condition, vacant lower-income housing is available within the areas.

# Section 504 Grievance Procedure

## Nash County

### 2017 CDBG-DR

*Program Contact:*

*Patsy McGhee, Assistant to the County Manager/Grants & Intergovernmental Relations  
120 W. Washington Street, Suite 3040, Nashville, NC 27856  
(252) 462-2434  
patsy.mcgee@nashcountync.gov*

Any Citizen or Citizen's group should submit any Complaint concerning Section 504 or accessibility issues to the *Program Contact* in written form. The *Program Contact* shall respond in writing to the inquiring party within 15 working days and provide due process to equitably and promptly resolve the Complaint at the local level.

However, if the inquiring party feels Nash County has not adequately address their Complaint, the inquiring party may submit the Complaint to NC DEM at the following address;

*NC Department of Public Safety  
Division Emergency Management  
4238 Mail Service Center  
Raleigh, NC 27699-4238*

Nash County shall document all situations involving complaints to include the initial complaint though resolution of the complaint.

Nash County will take the following proactive measures provide information concerning Section 504.

- Notify beneficiaries and program participants of the Section 504 Grievance Procedure and that Nash County does not discriminate on the basis of handicap by providing handouts to these parties
- Notify staff of the Section 504 Grievance Procedure and that Nash County does not discriminate on the basis of handicap in the workplace by posting information on workplace public notice bulletin boards
- Will notify the public of the Section 504 Grievance Procedure and that Nash County does not discriminate on the basis of handicap by posting information on the County public information website.