



**MICHIGAN ECONOMIC
DEVELOPMENT CORPORATION**

Michigan Economic Development Corporation Community Development Block Grant – Disaster Recovery

CITIZEN PARTICIPATION PLAN





Version History

Version	Date	Notes
1.0	08/29/2022	Initial Publication of CDBG-DR Michigan Citizen Participation Plan
2.0	xx/xx/2023	Addition of FHEO contact and update to Accessibility details



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CITIZEN PARTICIPATION PLAN FOR CDBG-DR PROGRAMS

Introduction

The State of Michigan is the recipient of the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant Disaster Recovery (CDBG-DR) funds allocated in response to presidentially declared disasters. The Michigan Strategic Fund (MSF) is the grantee of HUD’s CDBG-DR funds. The MSF has a memorandum of understanding with the Michigan Economic Development Corporation (MEDC) to administer the CDBG-DR funds on behalf of the state. These CDBG-DR funds are for eligible activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from qualifying declared disasters.

Purpose

The MEDC has adopted a Citizen Participation Plan (CPP) that sets forth the MEDC’s procedures for citizen participation in the development and implementation of HUD’s CDBG-DR and mitigation activities and programs. The overall purpose of the CPP is to provide for and encourage citizens to participate in an advisory role in the planning, implementing, and assessing of Michigan’s CDBG-DR funded programs. The CPP has been developed to comply with the requirements outlined in 24 CFR Part 91.115 (Citizen Participation Plan for States) and the HUD requirements for allocating funds for disaster recovery and mitigation.

Stakeholder Consultation During Plan Development

To ensure the consistency of the CDBG-DR Action Plan with applicable regional redevelopment plans and other recovery initiatives, the MEDC will make best efforts to consult with the following stakeholders:

- Indian tribes
- Local governments
- Federal partners
- Nongovernmental organizations
- Private sector
- Other affected parties in the surrounding geographic area
- Organizations that advocate on behalf of members of protected classes, vulnerable



populations, and underserved communities impacted by the disaster

- Relevant government agencies, including the State and local emergency management agencies that have primary responsibility for the administration of Federal Emergency Management Agency funds

CDBG-DR Action Plans – Public Notice and Comment Periods

Citizen participation requirements for the CDBG-DR Action Plan are identified in related Federal Register Notices for presidentially declared disasters. Federal Register Notices may waive regular citizen participation requirements and States requirements for notifying the public regarding the use of CDBG-DR funds and provide an alternative streamlined process.

CDBG-DR Action Plan

The MEDC will post the draft initial CDBG-DR Action Plan or any substantial amendment for **at least 30 days of public comment on the CDBG-DR website at <https://www.miplace.org/cdbg-dr/>.**

Additionally, the MEDC will convene at least two public hearings (including in person and/or virtual hearings) on the draft CDBG-DR Action Plan after being posted on its website for public comment and prior to submission to HUD. Notice of all hearings will be posted for a minimum of 10 business days prior to public hearings.

The MEDC makes every effort to publish the draft CDBG-DR Action Plan in a manner that affords citizens, units of general local government, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. The plan will remain available on the MEDC CDBG-DR website.

To notify the public of the plan’s availability, public notification is provided through the following methods:

- Direct email notice to individuals who had signed up for updates on CDBG-DR plan development
- Email notices to local and tribal governments and nonprofit/community-based organizations that have been active in supporting survivors in disaster recovery (e.g., long term recovery groups, AARP, disability services advocates, culturally-specific organizations)
- Press release to major news outlets in declared disaster areas
- Announcements on agency-managed social media accounts
- Formal notice and public announcement on the MEDC’s CDBG-DR website



The public announcement explains that interested parties are given a reasonable opportunity to examine the contents of the plans and submit comments, and the MEDC also will provide a copy of the plans to interested parties upon request.

The MEDC considers any comments or views of citizens and units of general local government received either in writing or orally in preparing the final CDBG-DR Action Plan. The MEDC will address the substance of any comments rather than only acknowledging receipt. A summary of these comments and the MEDC's response, including those not accepted and the reasons why, will be attached to the final CDBG-DR Action Plan and uploaded in Disaster Recovery Grant Reporting (DRGR) System.

Website

To notify the public of the CDBG-DR Plan's availability, the MEDC will post the CDBG-DR Action Plan and substantial amendments on the CDBG-DR website <https://www.miplace.org/cdbg-dr/>, which is linked to the MEDC's main website www.miplace.org/programs/community-development-block-grant. To ensure that the public knows how all funds are used and administered, the MEDC also will post all performance reports, the Citizen Participation Plan, procurement policies, contracts that will be paid with CDBG-DR funds, and a description of goods or services currently being procured on the CDBG-DR website. For further information regarding the website content, see Appendix A – Website Policies and Procedures for CDBG-DR.

Public Hearings

Per the Federal Register's approach for CDBG-DR, at least one public hearing is required during the 30-day comment period. The process below will be followed for a public hearing regarding the use of CDBG-DR funds or a substantial amendment.

All public hearings will be held at a time and accessible location convenient to potential and actual beneficiaries, and with accommodations for persons with disabilities or limited English proficiency. Both in-person and webinar hosted hearings will be promoted for at least 10 business days prior to the hearing.

Additionally, public hearing notification is provided via:

- Direct email notice to individuals who had signed up for updates on CDBG-DR plan development.
- Email notices to local and tribal governments and non-profit/community-based organizations that have been active in supporting survivors in disaster recovery (e.g., long term recovery groups, AARP, disability services advocates, culturally-specific organizations).
- Press release to all major news outlets in declared disaster areas.



- Announcements on agency-managed social media accounts.
- Formal notice and public announcement on the MEDC's CDBG-DR website.

Time Period for Comments

The MEDC provides at least 30-days for public comment from citizens and units of local government on the CDBG-DR action plan. Written public comments may be made to the MEDC by emailing CDBGDR@michigan.org or by mail to **MEDC, Attention: CDBG-DR, 300 N. Washington Sq., Lansing, MI 48913.**

The CDBG-DR Action Plan will be available on the MEDC CDBG-DR website at <https://www.miplace.org/cdbg-dr/>.

Consideration of Comments

The MEDC considers any comments or views of citizens and units of general local government received either in writing or orally when preparing the final CDBG-DR Action Plan. The MEDC will address the substance of any comments rather than simply acknowledging receipt. A summary of those comments and the MEDC's responses will be attached to the final CDBG-DR Action Plan or substantial amendment and uploaded to the DRGR System.

Substantial Amendment

Substantial amendments to the CDBG-DR Action Plan will require at least 30-days of public notice. The public notice will be made in the same manner as prescribed in this document. The thresholds for a substantial amendment are as follows:

An amendment shall be considered substantial (requiring public notification and a comment period) under the following circumstances:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- A reallocation that constitutes a change of 25% or greater in a program budget

Non-Substantial Amendment

Non-substantial amendments are those amendments that do not meet the threshold for a substantial amendment and do not require a public comment period. Non-substantial amendments to the CDBG-DR Action Plan will be posted on the MEDC CDBG-DR website after notification is sent to HUD and the amendment becomes effective.



Every amendment to the CDBG-DR Action Plan (substantial and non-substantial) will be numbered sequentially and posted on the MEDC's CDBG-DR website.

Citizen Participation Plan and Accessibility for CDBG-DR

To ensure that limited English proficiency (LEP) individuals and persons with disabilities have prior notice and access to the public hearings, the MEDC will take the following actions if the LEP population is greater than 5% or exceeds 1,000 persons in the service area according to the MEDC's Language Access Plan:

- Announce public hearings to organizations that represent minorities and person with disabilities at least 5 business days prior to the public hearing date(s).
- Include a statement in public hearing notices indicating that participants may request language interpretation to assist in their participation, either via email or phone.
- Include a statement in notices of public hearings that the location of the meetings is accessible to persons with physical disabilities.
- Include a statement in public hearing notices that attendees can request reasonable accommodations from the MEDC to participate in the public meetings.
- The MEDC will make a reasonable effort to translate significant documents, as requested, and include a link to "Google Translate" on the MEDC's website to accommodate LEP communities.

Residents who require special accommodations to attend the hearing, should contact the MEDC by emailing CDBGDR@michigan.org or by mail to **MEDC, Attention: CDBG-DR, 300 N. Washington Sq., Lansing, MI 48913** to make advance arrangements. For hearings that are held in areas that meet the minimum threshold for LEP accommodations, translations will be provided.

The MEDC provides guidance to its units of general local government and subrecipients on developing a local Language Access Plan. Provisions for interpretation shall be made for LEP citizens to encourage and ensure meaningful access to participation for public hearings, communication materials, websites, and public comments.

Availability to the Public

The MEDC will provide the CDBG-DR Action Plan, substantial amendments, all performance reports, Citizen Participation Plan, procurement policies, contracts that will be paid with CDBG-DR funds, and a description of goods or services currently being procured to the public, including materials in a form accessible to persons with disabilities and LEP individuals. These documents



are made available to the public on the MEDC CDBG-DR website <https://www.miplace.org/cdbg-dr/> to ensure that the public knows how all funds are used and administered.

Access to Records

Citizens, public agencies, and other interested parties are given reasonable and timely access to information and records related to the MEDC's CDBG-DR Action Plan and the MEDC's use of assistance under the programs covered by the plan. Presentation materials, resources used to compile the information in the plan, comments compiled at public hearings, and all other related materials are available to the public upon request.

Complaints

To comply with the requirements regarding complaints, the MEDC has designated an appropriate and practicable procedure to handle complaints from citizens related to the CDBG-DR Action Plan, substantial amendments, and performance reports. Upon receiving a complaint, the MEDC will provide a timely, substantive written response within 15 working days.

Complaints should be sent in writing to:

Bill Povalla, Senior Program Specialist
Michigan Economic Development Corporation
300 N. Washington Sq.
Lansing, MI 48913
Email: povallab@michigan.org

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the HUD Office of the Inspector General's Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov).

[Direct fair housing complaints can be made by calling HUD's Office of Fair Housing and Equal Opportunity \(FHEO\) Region 52 office at 1 \(800\) 765-9372, or emailing them at \[complaintsoffice05@hud.gov\]\(mailto:complaintsoffice05@hud.gov\), or on \[hud.gov\]\(http://hud.gov\).](#)

Complaints regarding accessibility can be reported to the MEDC's Section 504 Coordinator. Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communications requirements under the Americans with Disabilities Act.

MEDC's Section 504 Coordinator:

Bill Povalla, Senior Program Specialist
Michigan Economic Development Corporation



300 N. Washington Sq.
Lansing, MI 48913
Email: povallab@michigan.org
Phone: 517-241-6810

Use of the Citizen Participation Plan

The MEDC will follow the Citizen Participation Plan fully and to the best of their ability, as described above.

Requirements for Local Government Receiving CDBG-DR Funds

Recipients of CDBG-DR funds must comply with the Citizen Participation Plan for CDBG-DR requirements as found in applicable Federal Register Notices. All applicants and recipients of grant/loan funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the local government and recipients regarding the CDBG-DR project, except for confidential matters related to housing and economic development programs, shall be open to examination by all citizens.

The applicant/recipient must provide technical assistance to groups representative of persons of low and moderate income who request such assistance in developing proposals at the level of expertise available at governing offices. All application materials and instructions shall be provided at no cost to any such group requesting them. Citizens shall be provided with adequate and timely information, to enable them to be meaningfully involved in important decisions at the various stages of the program, including, at a minimum, the determination of needs, a review of the proposed activities, and a review of past program performance, in the following manner:

- 1) At least one public hearing shall be held prior to the submission of an application for housing and/or non-housing needs being submitted to the MEDC for funding through the CDBG-DR Program. Hearings shall be scheduled at a time and location determined to allow the majority of interested citizens to attend without undue inconvenience. The development of needs and a review of the proposed activities and their possible environmental impact must be addressed at this hearing as reflected in the minutes of the hearing. The hearing cannot be more than 6 months prior to application submittal.
- 2) Notification of all hearings shall be given a minimum of 5 business days (actually, 7 days, as the day of the notice and the day of the hearing cannot be counted as one of the 5 business days) in advance to allow citizens the opportunity to schedule their attendance.



Notification shall be in the form of display advertisements in the local newspaper with the greatest distribution, and/or by posting letters, flyers, and any other forms that are clearly documented to have wide circulation.

All hearings must be accessible to persons with disabilities. Provision for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance. The chief elected official's office shall receive and relate to the appropriate persons or groups any views or proposals submitted to aforesaid office within the decision-making time. Any criticism submitted in writing at any time should be answered in writing within 15 working days by the chief elected official's office. If the complaint is not resolved, it shall be referred to the governing body for final disposition.



Appendix A: MEDC Website Policies and Procedures for CDBG-DR

Website Purpose

A separate website will be developed for the CDBG-DR Program instead of adding it to the MEDC website as a tab. This is being done to make it easier for individuals and communities to access the information in a straightforward manner.

Website Content

Per guidance contained in the CDBG-DR announcement the web site will contain the following information:

- The CDBG-DR Action Plan and any amendments. It will include communication from HUD regarding the CDBG-DR Action Plan and any comments received from the public as well as documented responses to the comments received.
- Each Performance Report from DRGR. This will be compiled and delivered by our Finance Division as well as documentation provided by the staff person in charge of the CDBG-DR program.
- The Citizen Participation Plan. This will be specifically geared towards the CDBG-DR Program. The MEDC has specific requirements for communities which receive CDBG funding for projects. At a minimum there will be one public hearing for the Counties that were designated in the HUD notice. Special outreach will be made to senior citizens, low and moderate income households and ethnic minorities within the jurisdiction.
- Procurement Processes and Procedures.
- Policies and Procedures regarding the duplication of benefits.
- Policies and Procedures to detect fraud, waste and abuse.
- All executed contracts with subrecipients.
- A description and status of services or goods being procured by subrecipients.
- Environmental review documents related to programs. We will not post the environmental review documents for individual families, businesses or applicants.
- All applications for assistance so that the public will be able to determine what documentation they will need to access assistance. This will be especially important because of the documentation that is needed to ensure the non-duplication of benefits.



- Descriptions of all the programs being funded and the policies and procedures associated with each.
- Contact information for all subrecipients, as well as for the MEDC staff associated with the programs.
- The MEDC will have a link to google translate on the web site as well as an ability for individuals to utilize translation through www.lep.gov.

Website Process

It is anticipated that the web site will be updated on a regular basis, perhaps as frequently as weekly in the beginning of the CDBG-DR process as much of the information will be developed and implementation will get underway. Thereafter, the web site will be updated, at a minimum, on a quarterly basis.

Website Coordinator:

Bill Povalla, Senior Program Specialist
Michigan Economic Development Corporation
300 N. Washington Sq.
Lansing, MI 48913
Email: povallab@michigan.org
Phone: 517-241-6810

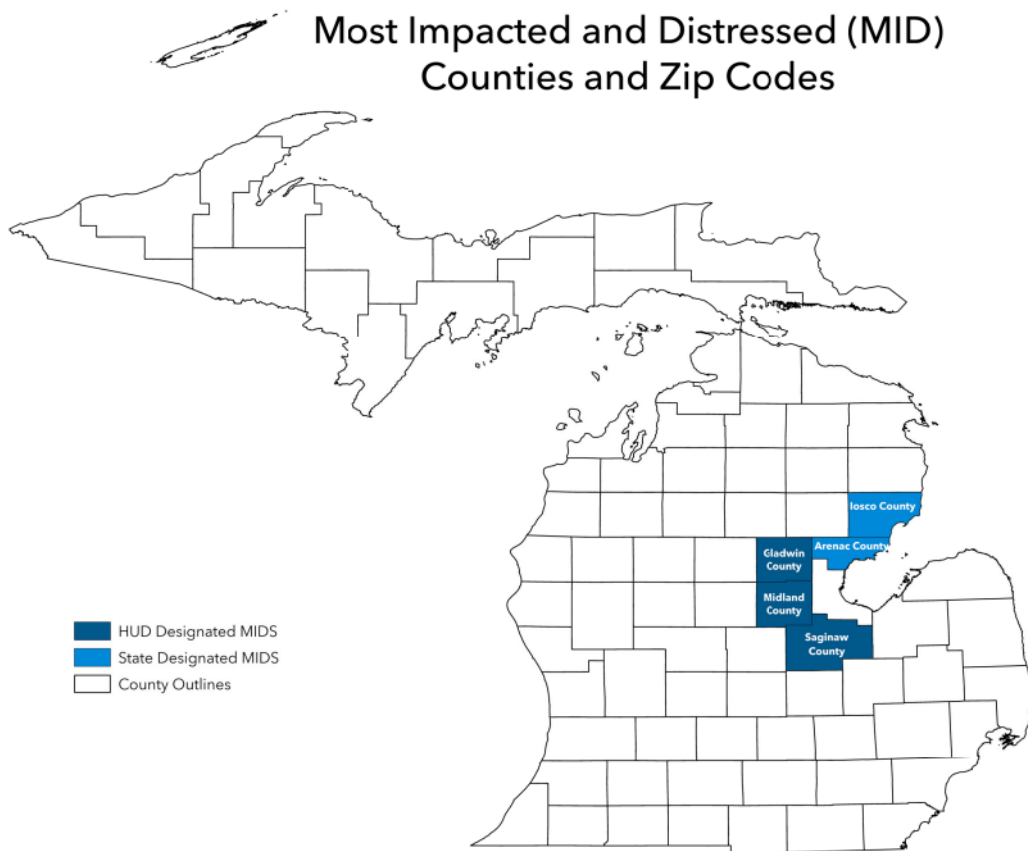


Appendix B: 2020 and 2021 Federally Declared Disasters

The U.S. Department of Housing and Urban Development (HUD) has allocated \$59,898,000 in CDBG-DR funds in response to 2020 severe storms and flooding (DR-4547) through FR-6303-N-01 (Allocation Notice) made on February 3, 2022. This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2022 for major disasters occurring in 2020. In March 2022, HUD allocated an additional \$12,033,000 in CDBG-DR funds from the Appropriations Act for disasters occurring in 2021 (DR-4607) through FR-6326-N-01 (Pub. L. 117-43) made on May 24, 2022. These CDBG-DR funds are for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2020 or 2021.



HUD Identified Most Impacted and Distressed (MID) Areas from 2020 Disasters (DR-4547)



HUD MID ZIP Codes	48612 (Gladwin County) *
HUD MID Counties	Midland and Saginaw Counties

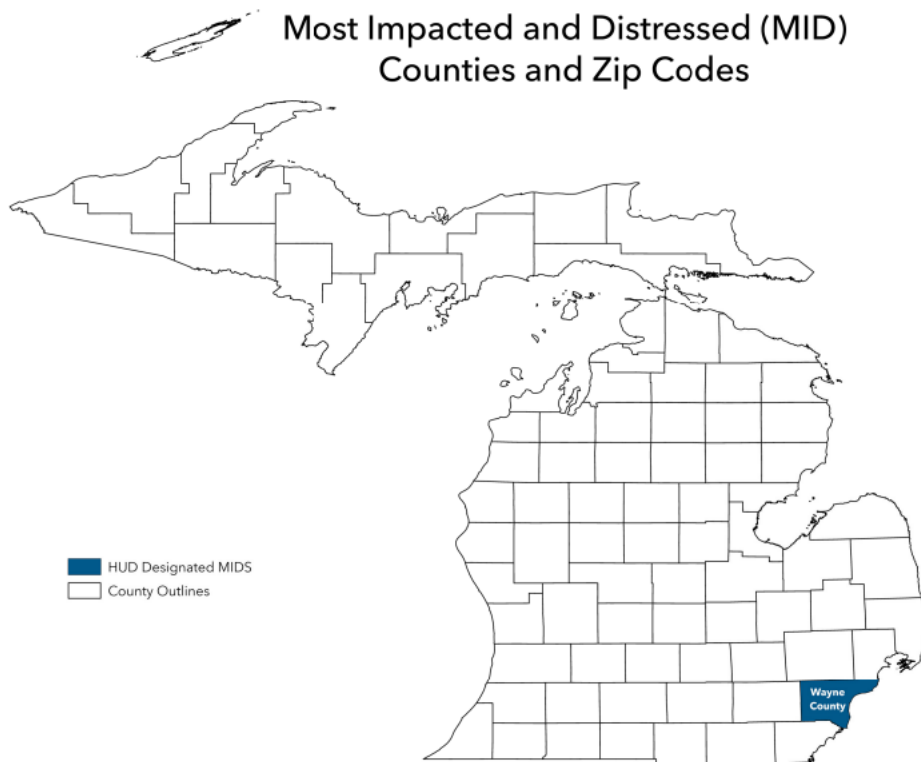
*Within the Consolidated Notice, HUD allows grantees to expand eligibility to the whole county when HUD designated a ZIP Code as a HUD-identified MID area. The MEDC has chosen to expand eligibility to include all of Gladwin County as a HUD-identified MID area.

Remaining Counties Adversely Affected and Eligible for CDBG-DR under DR-4547

State Grantee MID Counties	Arenac and Iosco Counties
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HUD Identified Most Impacted and Distressed (MID) Areas from 2021 Disasters (DR-4607)



HUD MID Counties

Wayne County



CDBG-DR Citizen Participation Waiver (87 FR 6364, 02-03-2022 and 87 FR 31636, 05-24-2022)

Citizen participation waiver and alternative requirement. 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 require the State to include public hearings on the proposed action plan and provide a reasonable opportunity (at least 30 days) for citizen comment and ongoing citizen access to information about the use of grant funds. The streamlined citizen participation requirements for a grant under this notice are:

- Publication of the action plan, opportunity for public comment, and substantial amendment criteria. Before the State adopts the action plan for this grant or any substantial amendment to the action plan, the State will publish the proposed plan or amendment.
- The manner of publication must include prominent posting on the State’s official website and must afford citizens, affected agencies, and other interested parties a reasonable opportunity to examine the plan or amendment’s contents.
- The topic of disaster recovery should be navigable by citizens from the State’s (or relevant agency’s) homepage.
- The State will notify affected citizens through electronic mailings, press releases, statements by public officials, media advertisements, public service announcements, and/or contacts with neighborhood organizations.
- Plan publication efforts must meet the effective communications requirements of 24 CFR 8.6 and other fair housing and civil rights requirements, such as the effective communication requirements under the Americans with Disabilities Act.