

C. CITIZEN PARTICIPATION PLAN



CDBG-DR STATE ACTION PLAN: CITIZEN PARTICIPATION PLAN

STATE OF NEBRASKA

AUGUST 2021 | *version 1.1*

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RECORD OF CHANGE

The following table summarizes changes to the State of Nebraska DR-4420 CDBG-DR Citizen Participation Plan.

Version	Date	Summary of Changes
1.1	08/31/2021	<p>Addition of clarifying details throughout and addition of more specific ongoing outreach and engagement efforts related to program development and ongoing unmet needs assessment. Revised are the following sections or subsections:</p> <ul style="list-style-type: none"> • Record of Change • Introduction • Public Participation Goal • Personas Con Dominio Limitado del Inglés • Public Comment • Online Engagement • Community Meetings & Public Hearings <p>Added are the following sections:</p> <ul style="list-style-type: none"> • Electronic Communication Tools • Field Staff, Surveys, & Touchpoints • Stakeholders • Ongoing Outreach & Engagement • Citizen Participation Plan Requirements

INTRODUCTION

The State of Nebraska Department of Economic Development (DED) sets forth the following Citizen Participation Plan (CPP).¹ The goal of the CPP is to ensure an equal opportunity for all of Nebraska's residents to participate in the planning and assessment of the Nebraska CDBG-DR recovery programs funded by the Department of Housing and Urban Development (HUD), as outlined in the Action Plan. This CPP is therefore separate and distinct from the CPP that is part of the State of Nebraska's Consolidated Planning process.

The policies and procedures outlined in the CPP are applicable to the development and implementation of the Action Plan, any substantial amendments to the Action Plan, and quarterly progress reports. The CPP applies to any activities financed from the CDBG-DR grant, administered by Nebraska DED, including activities carried out by local governments in accordance with 24 C.F.R. § 91.115(e).

Subsequent to HUD's approval of the initial Action Plan, this CPP has been revised to incorporate clarification and additional detail around actions taken as part of the initial citizen participation efforts and to provide supplementary detail regarding public involvement in the implementation of its Action Plan, as amended. The former are incorporated largely within the text, while the latter appear within the *Ongoing Outreach & Citizen Participation* section of this CPP.

PUBLIC PARTICIPATION GOAL

Why is public participation needed?

Nebraska DED seeks public involvement in the planning process to generate ideas, solve problems, make decisions, and collect feedback about proposed disaster recovery programs, including those within and outside of the HUD-most impacted and distressed (MID) areas, which includes the counties of Dodge, Douglas, and Sarpy.

Why should you participate?

All individuals living in communities where CDBG-DR-funded activities will or may take place are encouraged to participate—to advise and provide input on the planning, assessment, and implementation of the recovery programs and projects. Every effort will be made to ensure equal access to information and equal opportunity to participate.

Who should participate?

The intended audience of this information includes the general public, including those with an interest in low- and moderate-income housing, community development, and economic development activities, and especially those residents within the HUD- and state-MID areas; public agencies (local, regional, and statewide); municipal elected officials; long-term recovery groups; Tribal Nations; advocacy organizations for the homeless, the elderly; individuals and

¹ This plan is pursuant to the citizen participation requirements of 24 CFR Section 91.115, 83 FR 5844, and 83 FR 40314.

families with disabilities, racial and ethnic populations, and low-income citizens; special interest groups, including non-profit organizations, philanthropic organizations, community- and faith-based organizations, continuums of care, real estate developers, housing advocacy organizations, and commercial and industrial interest groups; and other interested parties.

What information is available?

Nebraska DED prioritizes the availability of information about CDBG-DR-funded activities to the full intended audience of local, regional, and statewide stakeholders to recovery programs and projects in Nebraska. These efforts will focus on providing consistent and open communication with individuals and subrecipients to create clear expectations of how funds will be distributed. Consistent and open communication will be provided through frequent website updates, post on the DED social media pages, and development of program factsheets to clarify and summarize program information. Information will be available in both English and Spanish.

EQUAL ACCESS

All publications and communication related to this Action Plan will comply with 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.

INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY

All program materials, including plans, forms, and online information, will be made available in English and Spanish on the DED CDBG-DR website, <https://opportunity.nebraska.gov/cdbq-dr>.

For individuals needing information translated into a language other than English or Spanish, please call 800-426-6505 or send an email using the contact form available at <https://opportunity.nebraska.gov/contact-us/>. DED will coordinate with municipalities and their government agencies, non-profits, and non-governmental organizations to distribute program materials to populations with limited English proficiency. Any in-person, web-based, or hybrid meetings related to the recovery programs will include at least one Spanish translator.

PERSONAS CON DOMINIO LIMITADO DEL INGLÉS

Todos los materiales del programa, incluidos los planes, los formularios y la información en línea, estarán disponibles en inglés y español en el sitio web de DED CDBG-DR, <https://opportunity.nebraska.gov/cdbq-dr>.

Para las personas que necesitan información traducida a un idioma que no sea inglés o español, llame al 800-426-6505 o envíe un correo electrónico utilizando el formulario de contacto disponible en <https://opportunity.nebraska.gov/contact-us/>. El DED se coordinará con los municipios y sus agencias gubernamentales, organizaciones sin fines de lucro y organizaciones no gubernamentales para distribuir los materiales del programa a las poblaciones con dominio limitado del inglés. Cualquier reunión en persona, basada en la web o híbrida relacionada con los programas de recuperación incluirá al menos un traductor de español.

INDIVIDUALS WITH DISABILITIES

All program materials will be made readily available, upon request, to persons with disabilities. The Action Plan and other materials on the DED CDBG-DR website are already conducted in accessible formats for visually impaired individuals. Meetings will be provided in a manner to provide a meaningful opportunity for persons with disabilities to participate. Any in-person, web-based, or hybrid meetings related to the recovery programs will include at least one American Sign Language (ASL) interpreter.

For any assistance related to accessibility, please contact DED:

- **Telephone:** 800-426-6505

- **Online/Email:** fill out the contact form available on DED's website at <https://opportunity.nebraska.gov/contact-us/>
- **Postal Mail:**
Nebraska Department of Economic Development
301 Centennial Mall South
PO Box 94666
Lincoln, NE 68509-4666
- **In person:**
Nebraska Department of Economic Development
301 Centennial Mall South, 4th Floor
Lincoln, NE 68508

PUBLIC COMMENT

There are multiple documents related to the distribution and administration of CDBG-DR funding that will be published for public comment according to the procedures outlined in the table below. All documents will be published online on the Nebraska DED's CDBG-DR website, <https://opportunity.nebraska.gov/cdbq-dr>. DED will receive comments via USPS mail, email, or through the DED's website:

Nebraska Department of Economic Development

ATTN: CDBG-DR Program Manager

PO Box 94666

Lincoln, NE 68509-4666

Email: DED.publiccomment@nebraska.gov

Website: <https://opportunity.nebraska.gov/cdbq-dr>

Table 1 – Methods for Public Comment

Document	Purpose	Outreach for Public Comment
Action Plan	Outline the State of Nebraska’s plan to spend CDBG-DR grant money to fund programs to address unmet recovery needs because of 2019 Severe Flooding and Winter Storms.	<ul style="list-style-type: none"> • Plan posted on Nebraska DED CDBG-DR website. • Notice of publication communicated via email as a press release. • Publication will be communicated via email with housing, community development, and economic development advocates (see Target Stakeholders), inclusive of individuals and entities that collaborate with the department and others in advocacy and delivery of existing programs.
Substantial Amendments to the Action Plan	Significant amendments to the Action Plan, specifically defined in the Program Administration Section of the Action Plan and below.	<ul style="list-style-type: none"> • Publication will be communicated via email with housing, community development, and economic development advocates (see Target Stakeholders), inclusive of individuals and entities that collaborate with the department and others in advocacy and delivery of existing programs. Correspondence for the Action Plan also encouraged recipients to communicate with local leaders, constituents, etc. using press releases, public statements, media postings, and contacting neighborhood organizations. DED anticipates undertaking similar actions for substantial amendments. • The Action Plan comment period will be advertised through the League of Nebraska Municipalities, having exposure to all municipal officials who have an email address (e.g., mayors, clerks, administrators, utilities personnel, etc.). • Publication announcement will be presented through the media, including commonly used social media platforms that, as of this writing, include Facebook, LinkedIn, and Twitter. • In-person, hybrid, and/or virtual public meetings, as appropriate. The Action plan comment period will include virtual public meetings²³ • Comment period of no less than 30 days⁴
Quarterly Performance Reports	Identifies the progress DED and subrecipients are making toward meeting recovery program objectives and summarizes expenditures to date.	<ul style="list-style-type: none"> • Report posted on Nebraska DED CDBG-DR website. • Publication will be communicated via email with housing, community development, and economic development advocates (see Target Stakeholders), inclusive of individuals and entities that collaborate with the department and others in advocacy and delivery of existing programs.

² Virtual public meetings in place of in-person public meetings given the ongoing pandemic of coronavirus disease 2019 (COVID-19) caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

³ 83-FR-5844, February 9, 2018

⁴ Ibid.

Should the needs of the state throughout the disaster recovery process change based on feedback and coordination with target stakeholders as described below, DED will be responsible for amending the Action Plan to most effectively use the CDBG-DR funds. Amendments may include updates to the unmet needs assessment, the program sections, or redistribution of funding allocations. The process required for completing a plan amendment varies based on the content of the amendment.

A substantial amendment is defined by the minimum threshold for requiring substantial amendment procedures, including:

- A change in program benefit or eligibility criteria;
- An addition or deletion of an activity; or
- An allocation or reallocation of \$5 million or more.

As appropriate, DED will be responsible for coordinating with partner agencies or jurisdictions to update the plan. All amendments will be clearly marked in the body of the plan. Moreover, at the beginning of each amended plan there will be a summary of the amendment (i.e., record of change).

DED will notify HUD when any non-substantial amendments are processed but will not seek public comment, consistent with HUD's guidance. This notification will be made at least five business days before the amendment becomes effective.⁵ Every amendment, substantial or not, will be posted sequentially on the CDBG-DR website. Refer to Online Engagement for information about how to access content online.

The public will have the opportunity to review this documentation to comment on the design of the CDBG-DR funded recovery programs. The information available for public comment will include, but is not limited to:

- Amount of assistance the state expects to receive,
- Range of activities that may be undertaken,
- Estimated assistance that will benefit persons of low- and moderate-income, and
- Plans to minimize displacement of persons and to assist any persons displaced.

All public comments received by DED will be published with the Action Plan and after each substantial amendment. Feedback and recommendations will be considered and integrated into the documents as appropriate at the sole discretion of DED and in accordance with HUD guidance and policy.

⁵ Per procedures outlined in 83-FR-5844, February 9, 2018.

PARTICIPATION STRATEGIES

ONLINE ENGAGEMENT

The Nebraska DED will maintain a public CDBG-DR website regarding all disaster recovery activities supported with these funds.

This website is dedicated to hosting the following content related to the state's CDBG-DR program:

- Unmet Needs Assessment;
- State Action Plan and all amendments (substantial and non-substantial);
- Currently approved Disaster Recovery Grant Reporting System (DRGR) Action Plan and Amendments;
- Quarterly Performance Reports, as created using DRGR;
- Applicable laws and regulations related to the CDBG-DR program;
- Recovery program information (e.g., policies and procedures for programs and key recovery operations to be implemented by the grantee with CDBG-DR funds);
- Citizen participation resources (e.g., this citizen participation plan, press releases, public hearing information, public records request forms, public comment forms, contact information);
- Anti-fraud, waste, and abuse information;
- Procurement policies and procedures, as well as status of procurement of goods and services;
- Open CDBG-DR requests for proposal and other open grant funds;
- Executed CDBG-DR contracts; and
- Application status for the CDBG-DR programs.

Nebraska DED will update this website in a timely manner to ensure the most current information is available publicly. At a minimum, the website will be updated monthly.

ELECTRONIC COMMUNICATION TOOLS

As part of its ongoing efforts to foster meaningful engagement and outreach, Nebraska DED is implementing email communication tools that enable it to target specific audiences based on the subscriber's chosen preferences. In addition to offering notification to the broader audience, users will be able to subscribe to CDBG-DR related information and the agency will be able to analyze the effectiveness of its communications with real-time analytics including delivery and open rates, and click-throughs to websites.

Additionally, Nebraska DED is committed to leveraging state, federal, and community partners to disseminate CDBG-DR program information. Nebraska DED will utilize these partners' networks to encourage participation in the CDBG-DR program mailing list. For example, via email, the HUD Omaha CPD Field Office have indicated they would disseminate information on our behalf to their network of contacts.

FIELD STAFF, SURVEYS, & TOUCHPOINTS

As part of the initial Action Plan process, Nebraska DED conducted a survey of all impacted Public Housing Authorities (PHAs) and counties to identify unmet needs specific to public housing authorities. See Action Plan, Attachment A. Nebraska DED's Field Staff assist in conducting surveys and in ad-hoc information gathering.

Field Staff are positioned throughout the state, where their first-hand knowledge of Nebraska's diverse economic climate is matched only by their expertise at building productive partnerships. Field Staff are the "eyes and ears" of the agency, and a resource to assist communities, established business owners, new entrepreneurs and everyday citizens in any aspect of economic development — from support for business expansions, disaster recovery, workforce housing development, and more. The Disaster Recovery Coordinator is Field Staff.

In addition to regularly meeting with the Long-Term Recovery Groups (LTRGs), the Disaster Recovery Coordinator continues to meet with the Governor's Task Force, Task Force sub-groups, Nebraska Volunteer Organizations Active in Disaster (VOAD), Tribal Nations, and housing agencies throughout the HUD MID areas. The Disaster Recovery Coordinator's ongoing connection with each of these community groups allows Nebraska DED to maintain a pulse of the "situation on the ground" and provides a channel for stakeholder organizations to ask questions and provide comments throughout CDBG-DR program design. This continuous flow of information—feedback from the field and answers to questions—has established good two-way communication that will serve as a benchmark for the grant implementation phase. Nebraska DED will continue to leverage these groups to develop robust application and program guidelines to best serve impacted communities.

COMMUNITY MEETINGS & PUBLIC HEARINGS

Community meetings will be held as part of the planning, program design, and implementation processes. These meetings may assume a variety of formats, including in-person meetings and online webinars. The purpose of these meetings will be to provide stakeholders with an opportunity to learn more about the CDBG-DR activities in their area and provide input on programs and activities.

At a minimum, all meetings will be announced online 15 days prior to the date of the meeting. The announcement will include the date, time, and location of the meeting. Efforts will also be made to advertise meetings through other means like social media and CDBG-DR email

Given the ongoing pandemic of COVID-19 caused by SARS-CoV-2, DED and any subrecipients are prepared to pivot any community meetings designed to be held in person to virtual meetings if social distancing requirements prevent the whole community from participating in person. This may include a hybrid alternative, where virtual and in-person options are available if the public health situation allows.

Nebraska DED will be responsive to any additional HUD guidance regarding best practices for outreach during a pandemic.

lists, through elected officials of the HUD MID communities, through the state's economic development districts representing the HUD MID area, and through representatives of community groups and stakeholders (as described below).

Meetings will be held at an ADA-accessible location and outside of business hours when possible. Interpretation services will be provided for Spanish and ASL for in-person, web-based, or hybrid meetings. Additional accommodations may be made available upon request. For information about where to direct these requests, refer to the Equal Access section.

The structure of these meetings may vary, but topics likely to be discussed include:

- Education on the CDBG-DR program, including the purpose and type of activities, timing of funding, clarification of resources available, and how the program contributes to long-term recovery.
- Review of the Action Plan contents.
- Status update on long-term recovery as a whole, and an opportunity for the public to ask questions about the CDBG-DR program and recovery.
- Solicit feedback on unmet priority needs, program design, and program guidelines.
- Overview of the process of identifying and integrating the Action Plan process into existing public meetings in impacted areas.
- Overview of the process of updating the Action Plan through substantial amendments to best serve community needs in the HUD MID area.

Additionally, to disseminate meeting information to maximize the reach to impacted persons, Nebraska DED will leverage the established networks of the Governor's Task Force for Disaster Recovery, Long-Term Recovery Groups (LTRGs), and other state, regional, and local partners.

STAKEHOLDERS

TARGET STAKEHOLDERS

Target Stakeholders include:

- General public, including those with an interest in low- and moderate-income housing, community development, and economic development activities, and especially those residents within the HUD- and state-MID areas;
- Public agencies (local, regional, and statewide);
- Municipal elected officials;
- Tribal nations;
- Long-term recovery groups (LTRGs) (see below for a list of eleven LTRGs activated in response to the 2019 flooding event)
- Advocacy organizations for the homeless, elderly, individuals and families with disabilities, racial and ethnic populations, and low- and moderate-income citizens;
- Special interest groups, including non-profit organizations, philanthropic organizations, community and faith-based organizations, continuums of care, real estate developers, housing advocacy organizations, commercial and industrial interests; and
- Other interested parties.

Nebraska DED's engagement with target stakeholders throughout program development will provide Nebraska DED with insight on how to best serve vulnerable populations in the HUD MID areas.

VULNERABLE POPULATIONS

Nebraska DED will conduct additional outreach and coordination with the State's partners to ensure that funds support the recovery of federally protected classes and other vulnerable populations, including LMI persons of all races and ethnicities. In addition to coordination with the Nebraska Investment Finance Authority (NIFA), the administrating agency for Low-Income Housing Tax Credits (LIHTC), and their community partners,

In support of equity in recovery, Nebraska DED will also continue engagement with

- Public Housing Authorities (PHAs),
- Tribal Nation representatives,
- Economic Development Districts,⁶ and

⁶ Across the state, Economic Development Districts (EDDs) serve local communities under the CDBG program by providing business, community, and economic development services. EDDs' extensive experience with CDBG and cross-cutting requirements allows communities to effectively manage their CDBG awards. Because of their regional nature, communities often benefit in partnering with an EDD not only due to their familiarity of CDBG but also the unique conditions of the community. For additional information about the services offered and communities served, see the Nebraska Regional Officials Council (NROC), <https://www.nrocne.com/>, The NROC is the statewide organization of Nebraska's eight Economic Development Districts (EDD).

- Housing advocacy groups.

Outreach efforts will include an event with these groups to inform the program design to identify impacts and guidelines for the CDBG-DR programs.

To further support equity in recovery, Nebraska DED has established contacts with Tribal Nations, including:

- Native Council on Economic & Community Development of the Omaha Tribal Housing Authority,
- Santee Sioux Tribal Housing Authority,
- Northern Ponca Tribal Housing Authority,
- Winnebago Housing & Development Commission,
- Housing development partners for the Winnebago Tribal Nation (e.g., the Director of Planning & Development of the Winnebago Tribe and the HoChunk Community Development Corporation), and
- Nebraska Commission on Indian Affairs.

The Disaster Recovery Coordinator's ongoing communication with officials from the Tribal Nations helps assess remaining housing and infrastructure needs from the 2019 flooding. Further, Nebraska DED is committed to soliciting feedback on program design to identify impacts and unmet needs, and in the development of guidelines for the CDBG-DR program. To that end, Nebraska DED will also consult with and engage the Nebraska Commission on Latino-Americans and NE Equal Opportunity Commission and their respective networks, to bolster equity in recovery.

LEVERAGING OUR STATE PARTNERS

Nebraska DED is working in coordination with state partners, such as the Nebraska Investment Finance Authority (NIFA) and Nebraska Emergency Management Agency (NEMA), to administer the housing and infrastructure programs, respectively. Using the avenues of communication outlined above, Nebraska DED plans to leverage and engage NIFA and NEMA's networks of organizations regarding program design and implementation to gain insight on how to best serve impacted persons in the HUD MID areas.

Additionally, Nebraska DED plans to leverage and engage the Housing Opportunities for Persons with AIDS (HOPWA) and Emergency Solutions Grants (ESG) networks established by the Nebraska Department of Health and Human Services (DHHS) Public Health Division and Children and Family Services Division, respectively. In partnership with Nebraska DED, these DHHS Divisions have administered the state's annual allocations for HOPWA and ESG resources.

GOVERNOR'S TASK FORCE

Additionally, Nebraska DED will leverage the Governor's Task Force for Disaster Recovery (GTFDR or GTF) to disseminate meeting information to maximize the reach to impacted persons. Coordination through the GTF will ensure that engagement is inclusive of key partners involved

in recovery, including representation for the homeless, the elderly, and individuals and families with disabilities, low income citizens, tribal nations, special interest groups including racial and ethnic populations, and other vulnerable populations.

Initially, the GTF launched after the 2019 flooding to develop a Long-Term Recovery and Resilience Plan (the “Resilience Plan”). The GTF maintained six sub-groups—made up of public and private agencies—who came together to develop and implement the Resilience Plan for Nebraska. These sub-groups meet at regularly scheduled intervals and initially discussed goals, strategies, and tactics. After it was finalized in July of 2020, the sub-groups transitioned to the implementation phase of the Resilience Plan. The GTF sub-groups are summarized below. A full list of participating agencies and organizations can be found in the Action Plan, Attachment B.

Table 2 – Governor’s Task Force Sub-Group Summary

Working Sub-Groups	Agencies/Organizations Participating
1. Infrastructure Systems	4
2. Housing	7
3. Economic and Agriculture	14
4. Health and Social Services	7
5. Community Planning and Capacity Building*	*no subgroup formed
6. Natural and Cultural Resources	4
Additional Participating Groups:	
Local Impact Groups	34
Cross Cutting Organizations	24
Other: Nebraska Association of County Officials	

The GTF serves as a coordinating force for all phases of the disaster recovery process. It also functions as a “town hall” to discuss issues and needs, emergent or otherwise, that relate to declared disasters.

From the start, Nebraska DED has been integral in the Task Force, leading the Economic and Agriculture sub-group and co-leading the Housing sub-group. At each of these sub-group meetings as well as at the full GTF monthly meetings where all the agencies, organizations, and sub-groups meet together, Nebraska DED provides updates on progress related to the status of the CDBG-DR grant, including research related to unmet needs, data analysis, and action plan progress, and answers questions from Task Force participants. The GTF provides crucial feedback from all parties to better build out the CDBG-DR programs as evidenced by the conversations generated within and among the group. To date, leading and speaking on behalf of Nebraska DED are Dan Curran, Deputy Director of Programs; Jenny B. Mason, Director of Disaster Recovery; and Susan Nickerson, Disaster Recovery Coordinator. Contributors on DED’s behalf are likely to evolve as the recovery process continues to include other CDBG-DR program staff.

Nebraska DED will continue to leverage the Governor’s Task Force and sub-groups to bolster community engagement regarding program design and implementation is inclusive of key partners involved in recovery, including representation for the homeless, the elderly, and individuals and families with disabilities, low income citizens, tribal nations, special interest groups including racial and ethnic populations, and other vulnerable populations.

LONG-TERM RECOVERY GROUPS

Several Long-Term Recovery Groups (LTRGs) were established or resurrected, in large part, immediately following the 2019 flooding event. Nebraska DED’s involvement within each of those groups, and in particular the HUD MID areas, followed in short order. Nebraska DED’s ongoing direct engagement with all LTRGs⁷ connects Nebraska DED to local stakeholders representing each impacted community, including directly affected low-income and vulnerable populations, and other organizations and assistance agencies that represent tribal nations, racially and ethnically diverse populations, the elderly, and individuals with disabilities.

Specifically, eleven long-term recovery groups activated in response to the 2019 flooding event:

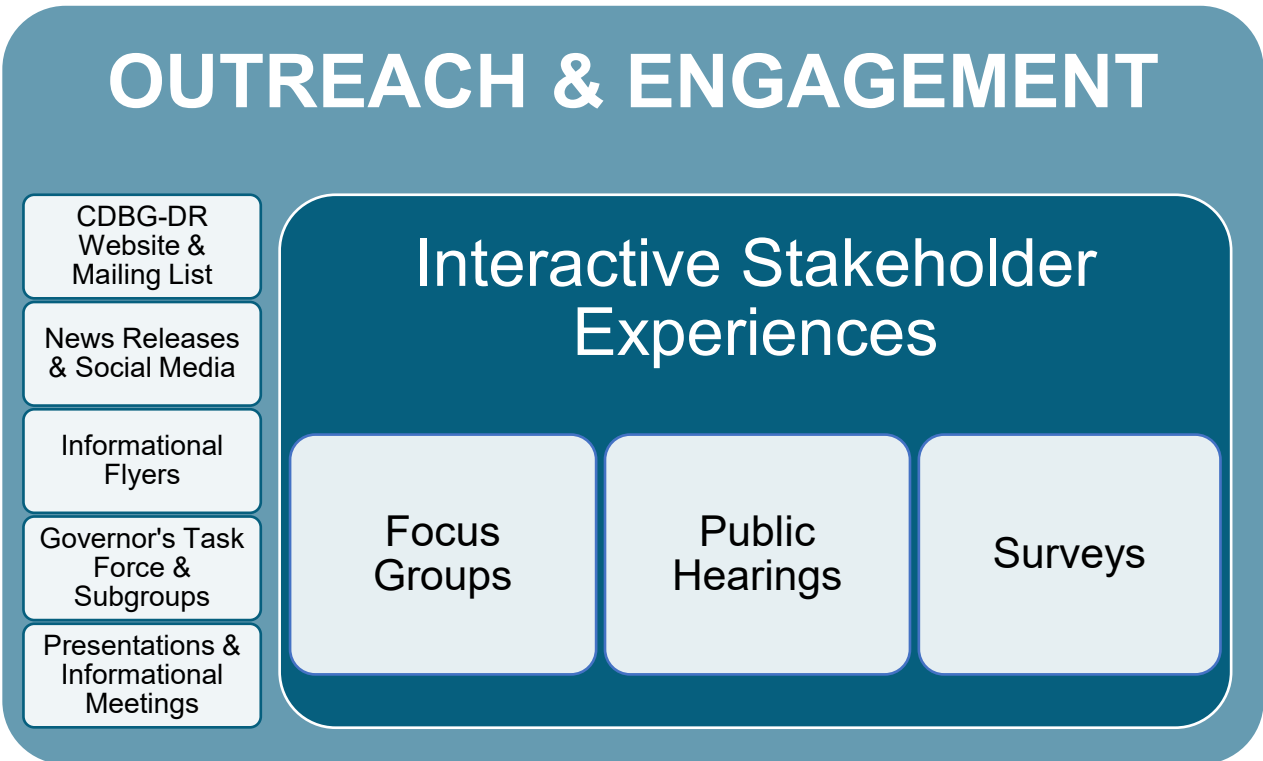
- HUD-MID areas (3 groups)
 - Greater Dodge County LTRG, Fremont
 - Douglas County Community LTRG, Valley
 - Sarpy County LTRG, Bellevue
- State-MID areas (8 groups)
 - Kearney Area Disaster Recovery Group, Kearney
 - Cass County LTRG, Weeping Water
 - Dawson County Recovery Group, Lexington
 - East Central LTRG, Columbus (represents five counties: Platte, Nance, Butler, Boone, Colfax)
 - Heartland Disaster Recovery Group, Grand Island
 - Northeast Nemaha County LTRG, Peru
 - Saunders County LTRG, Mead
 - Washington County LTRG, Blair

Nebraska DED’s Disaster Recovery Coordinator regularly attends LTRG meetings to provide CDBG-DR funding updates and answer questions regarding the Action Plan, the timeline, and the planned utilization for the funding. Additionally, Nebraska DED is developing a “Frequently Asked Questions” (FAQ) document addressing questions from local stakeholders to further assist Nebraska DED with outreach, sharing of information, and opportunities for engagement. FAQ documents will be made available on the CDBG-DR website. Nebraska DED will continue to engage in regular communication and solicit ongoing feedback from these LTRG community and organizational representatives through the CDBG-DR program implementation process.

⁷ As of June 2021, a majority of LTRGs outside of the HUD MID have converted to “blue skies” operations. However, Nebraska DED participates in regular meetings for those still meeting regularly, which includes the counties of Dodge, Douglas, and Sarpy.

ONGOING OUTREACH & ENGAGEMENT

Nebraska DED is committed to obtaining broad community input in developing and administering the CDBG-DR programs. In addition to Nebraska DED’s ongoing active participation in Long-Term Recovery Groups (LTRGs), the Governor’s Task Force for Disaster Recovery, and other stakeholder organizations in the HUD- and state- MID areas, Nebraska DED plans to utilize a variety of outreach and engagement methods for communication and feedback mechanisms to effectively reach persons impacted and get a better understanding of current needs. In general, the Nebraska DED aims for outreach and engagement methods to understand the needs, potential opportunities or barriers, and issues to inform its decision making. A proactive approach helps fine-tune plans prior to implementation.



Many of the methods used during the action planning process will continue throughout the grant period, to include news releases, electronic mailings, website and other internet postings, social media, surveys, public hearings, informational flyers (“one pagers”), and focus groups. Such categories are not intended to be mutually exclusive or all inclusive. For example, the Nebraska DED’s active participation in the Governor’s Task Force (and various subgroups) has and will continue to enable sharing and dissemination of updates, announcements, and program materials, as well as coordination with other organizations and individuals working to assist the state in disaster recovery. Nebraska DED has an open invitation to present information to and solicit feedback from the group that meets on a regular basis (currently monthly).

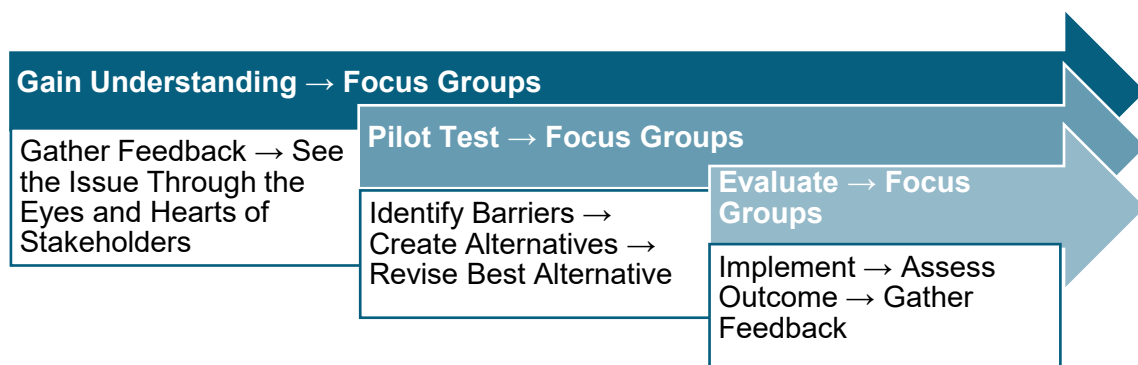
Nebraska DED will utilize various avenues of communication to solicit feedback from target stakeholders, especially those within the HUD MID area, on program design to identify impacts and develop guidelines for the CDBG-DR program. Dependent upon the outcomes of outreach methods, Nebraska DED may develop alternative approaches and/or lean into more successful, productive methods.

Key stages for ongoing outreach efforts:

- Development of Program Guidelines
- Program Launch
- Program Implementation and Technical Assistance

PROGRAM DEVELOPMENT

- Nebraska DED will solicit and engage with target stakeholders (described above under Target Stakeholders) in developing program guidelines before they are implemented to address unmet priority needs, especially in the HUD MID areas, and inform overall program design. This effort includes facilitating discussions through focus groups (or similar) with target stakeholders to better understand current community needs and build out programs to meet those critical needs. Interactive experiences, e.g., focus groups or other methods of direct request for engagement, often yield more actionable, information-rich feedback.



As a part of program set up and launch, Nebraska DED plans to release introductory guidance (e.g., frequently asked questions (FAQs)) related to the CDBG-DR Infrastructure Match Program, housing programs, and planning programs) to provide potential applicants an opportunity to learn more about the program’s requirements. Nebraska DED will request questions and comments related to the materials and leverage these comments and questions to build out application and program guidelines. Supplemental materials such as FAQs and “quick guides” may also be created to help bridge the gap between “potential applicants” and actual program applicants, as well as technical assistance materials for implementation of awarded activities and projects. While not entirely new to the state, the CDBG-DR program has a complex set of rules and requirements that are likely to be unfamiliar to applicants and subrecipients, so the Nebraska DED will plan to deliver a variety of technical assistance ahead of, during, and following the application and

implementation process. Where possible and appropriate, Nebraska DED will “piggyback” on other topical meetings to disseminate information, give notice of upcoming due dates and/or opportunities to engage, etc. This approach may broaden the audience and/or facilitate discussion about somewhat less familiar information in a more familiar, established environment.

Example of program launch engagement schedule:

- Publish FAQ and/or other introductory guidance materials
- Solicit feedback, e.g., focus group
- Consider feedback in drafting application materials
- Publish draft application materials
- Solicit feedback, e.g., focus group
- Consider feedback in finalizing application materials
- Training webinar on application, including scoring information
- Training webinar and issuance of applicant guidance for online application portal
- To coincide with awards, hold training webinar and issue subrecipient guidance for grants management portal to include instructions for submitting reporting and payment requests

Following an application cycle, Nebraska DED will evaluate application intake processes for possible improvements or alterations in future cycles for the same program and/or make changes to upcoming program application cycles for another program. As able and appropriate, Nebraska DED will undertake a similar analysis for program implementation and closeout processes and procedures.

For programs described in the Action Plan, the CDBG-DR webpage includes easily navigable sections where technical assistance materials will be readily accessible for applicants and subrecipients. To assist in providing effective and efficient technical assistance, Nebraska DED requests that CDBG-DR related questions be directed to a shared email inbox. As appropriate, published materials will be updated, noting any changes and additions made therein.

Not included in the above sample schedule are the “cross-cutting issues” applicable for all CDBG-DR funded projects. Nebraska DED is committed to holding trainings and developing guidance for dissemination to help enable responsible, compliant disaster recovery.

Marketing for these events will follow methods set forth in Participation Strategies.

A more formal outreach plan may be developed to enhance stakeholder knowledge of programs, including specific tactics for reaching target stakeholders, especially those within the HUD MID areas.

ONGOING UNMET NEEDS ASSESSMENT

As described throughout the Action Plan, Nebraska DED is committed to re-evaluating the analysis of unmet needs as programs are rolled out, especially given the CDBG-DR resources are often one of, if not the last, resource involved in long-term recovery from a disaster event.

With continued engagement with target stakeholders and collaboration with state partners, Long-Term Recovery Groups, and among the Governor’s Task Force, Nebraska DED will solicit and gather qualitative and quantitative assessment of needs. Nebraska DED’s in-house research team will assist in collecting, evaluating, and analyzing this information, comparing it to program outcomes.

As a practice, presentations and discussions with target stakeholders, advocacy and nonprofit groups, and community leaders and inform and guide policy development, help the state access and plan for future outreach efforts, and shape program goals and objectives that reflect and address the “situation on the ground”, i.e., be more responsive to unmet needs.

Nebraska DED regularly participates in formal and informal discussions with the state’s economic development districts and other entities and persons assisting local units of government with carrying out projects awarded with federal and/or state resources, including CDBG. For example, as part of the outreach for public comment on the initial Action Plan, DED presented an overview of the CDBG-DR program and the state’s proposed programming to the Nebraska League of Municipalities (LOMN) membership. As part of that presentation, DED fielded questions from the audience, which included mayors, clerks, administrators, utilities personnel, etc. The takeaways from that engagement reinforced the direction of the plan in its support of damages to infrastructure.

CITIZEN PARTICIPATION PLAN REQUIREMENTS

Nebraska DED certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 or 91.115, as applicable (except as provided for in notices providing waivers and alternative requirements for this grant).

Each unit of local government receiving assistance from Nebraska DED must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant) pursuant to FR-6066-N-01. During the term of the grant, Nebraska DED will provide citizens, affected local governments, and other interested parties with reasonable and timely access to information and records relating to the Action Plan and to its use of grant funds.

COMPLAINTS & GRIEVANCES

Residents who wish to submit a complaint related to the DED's published Action Plan, substantial amendments to the Action Plan, quarterly progress reports, or any other matters related to CDBG-DR funded programs, may do so using one of the following methods:

- **Telephone:** 800-426-6505
- **Online/Email:** fill out the contact form available on DED's website at <https://opportunity.nebraska.gov/cdbg-dr-citizen-complaint-form/>
- **Postal Mail:**
Nebraska Department of Economic Development
301 Centennial Mall South
PO Box 94666
Lincoln, NE 68509-4666
- **In person:**
Nebraska Department of Economic Development
301 Centennial Mall South, 4th Floor
Lincoln, NE 68508

Consistent with HUD's requirements, all complaints will be responded to within 15 days of receipt of the complaint, if practicable. Complaints related to fraud, waste, or abuse of government funds should be forwarded directly to the HUD Office of Inspector General (OIG) Fraud Hotline at phone: 1-800-347-3735 or email: hotline@hudoig.gov.