

NORTH CAROLINA
COUNTY OF GREENE

The Greene County Board of Commissioners met in regular session on Monday, January 6, 2025, at 10:00 AM in the Greene County Operations Center. Present for the meeting: Chairman Bennie Heath, Vice-Chairman Jerry Jones, Commissioner Derek Burrell, Commissioner Ray Johnson, Commissioner Robert Taylor, Jr., County Manager Kyle DeHaven, County Attorney Gay Stanley, and Deputy Clerk Kathy Mooring.

A. Call to Order

Chairman Bennie Heath called the meeting to order at 10:00 AM, gave the Invocation and led the Pledge to the Flag.

There were six Greene County staff and one person from the public in attendance.

B. Approval of Agenda

On a motion by Vice-Chairman Jones and seconded by Commissioner Taylor, the Board voted unanimously to approve the agenda as presented.

C. Public Hearing

1. Public Hearing before the Greene County Board of Commissioners for Approval of the Acquisition of Real Property
Chairman Heath opened the Public Hearing and called for any comments or questions. Seeing as none, Chairman Heath closed the Public Hearing.

Board Action: Real Property Acquisition through Land Option Agreement for Economic Development

On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board voted unanimously to approve.

D. Public Information

1. Greene County Legislative Forum
Mr. Cash noted this was for information only. The Legislative Forum will take place tomorrow January 7th at the Walstonburg American Legion Post at 11 a.m.

E. Consent Agenda

On a motion by Vice-Chairman Jones and seconded by Commissioner Taylor, Jr., the Board voted unanimously to approve the Consent Agenda.

1. 12-16-2024 Regular Meeting Minutes
2. Consideration of Late Present Use Value and Property Tax Relief Applications
3. Releases/Refunds

4. Budget Amendment Greene County Senior Services for ARPA Funds under III-B & III-C

F. Public Comments

No comments.

G. Presentation(s)

1. Award Economic Development Strategic Plan to Hayes Group
Mr. Trey Cash stated that the North Carolina Department of Commerce awarded Greene County a \$45,000 grant to develop an Economic Development Strategic Plan. In accordance with the County's purchasing policy, an informal bid notice was posted on the County website. Three bids were received: one from Hayes Group Consulting, one from Creative Economic Development Consulting, and one from Marketing Alliance. After a thorough review, a team of staff evaluated the proposals and selected Hayes Group Consulting for the following reasons:

Hayes Group Consulting comes highly recommended by the Lenoir County Board of Commissioners and their County Manager's Office for their multi-year work to create a strategic plan for Lenoir County. This demonstrates the firm's capability and success in delivering results for local governments in the region. The firm also has prior experience working in Greene County, including facilitating an ECU Honors Seminar in 2023, which highlights their familiarity with the community and its economic development needs.

Mr. Cash asked for the Boards approval to award the bid to Hayes Group Consulting.

On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board voted unanimously to approve.

2. Water System Asset Inventory and Assessment; Division of Water Infrastructure Offer & Acceptance
Rich Moore of McDavid Associates presented the necessary paperwork to accept the previously issued financial assistance offer of a \$150,000 Asset Inventory and Assessment grant. Commissioner Burress asked why the State had delayed making an official offer to the County, Mr. Moore noted that the State had basically forgot to send the necessary documents.

On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board voted unanimously to approve.

H. County Manager

1. Budget Amendment Greene County Senior Services General Purpose Funds
Mr. DeHaven noted that the shares for Senior Center of Excellence were just announced through the Division of Aging and the amount for Centers of Excellence was slightly higher than what was passed in the original budget ordinance. Therefore, the budget amendment is for the increase in funds.

On a motion by Vice-Chairman Jones and seconded by Commissioner Taylor, Jr., the Board voted unanimously to approve.

2. **Policy Revision; CDBG-I Compliance Plans**

Mr. DeHaven presented the CDBG-I Compliance Plans. He noted that policy revisions are requested to comply with current CDBG-I rules for participation. These policies already exist, and conform to the CDBG-I participation requirements from our last CDBG-I project from 2018 (Hedgefield Subdivision) but need amended to meet new participation standards and requirements. The three attached policies reflect the necessary changes to conform to current requirements to meet current standards.

On a motion by Vice-Chairman Jones and seconded by Commissioner Taylor, Jr., the Board voted unanimously to approve.

I. County Attorney's Comments

No comments.

J. Commissioners' Report and Recommendation

Commissioner Burress congratulated Mrs. Lorraine Washington on her appointment to the newly restructured governing board of Trillium Health Resources. Commissioner Burress also reminded everyone that at the last meeting, Mr. Ben Lanier appeared before the Commissioners to discuss challenges with broadband internet access. Commissioner Burress stated that he and Mr. Cash had discovered that the area where Mr. Lanier resides is scheduled for broadband completion by March 2025. Commissioner Burress had similar concerns raised by other residents and found that many areas have already been connected; however, these areas are not being serviced by InfinityLink, but may be covered by other internet service providers. He encouraged residents to check the North Carolina Department of Information Technology (DIT) website to identify which provider serves their area. He also reminded residents that today is the final day to pay property taxes before interest accrues. He also suggested that the board reconsider implementing an early payment discount.

Commissioner Jones noted that Friday, January 31st, 2025 is 4-H night so that other Commissioners can attend.

Chairman Heath reminded all that there will not be a second Commissioner meeting this month.

K. Closed Session

On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board voted unanimously to go into Closed Session for Economic Development and Personnel.

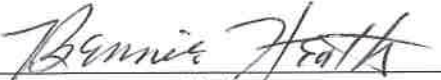
On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board voted unanimously to come out of Closed Session.

1. **Economic Development** - To conduct a closed session pursuant to the provisions set forth in N.C.G.S. § 143-318.11(a)(4)

Personnel - To conduct a closed session pursuant to the provisions set forth in
N.C.G.S. § 143-318.11(a)(6)

L. Adjourn

On a motion by Vice-Chairman Jones and seconded by Commissioner Johnson, the Board
voted unanimously to adjourn.


Bennie Heath, Chairman

Attest:




Kyle J. DeHaven, Clerk to the Board

RESOLUTION OF THE GREENE COUNTY BOARD OF COMMISSIONERS
FOR THE ACQUISITION OF REAL PROPERTY

WHEREAS, the Local Development Act of 1925 authorizes counties to make appropriations, and to acquire and convey interests in real property for the purposes of aiding and encouraging the location of manufacturing enterprises, and locating industrial and commercial plants in the county which will, in the discretion of the governing body of the county, increase the population, taxable property, agricultural industries, employment, industrial output, or business prospects of the city or county; and

WHEREAS, Counties may acquire and hold for resale real property for the purpose of encouraging economic development as authorized by N.C.G.S. 158-7.1(a) and (b); and

WHEREAS, Greene County proposes to acquire through the Option to Purchase, attached hereto as Exhibit A (the "Agreement"), fee simple interests in the following real property described as:

Parcel ID: 0500432

Located in Olds Township, Greene County, North Carolina and bounded, now or formerly, by Parcel ID: 0500432

Located in Olds Township, Greene County, North Carolina and bounded, now or formerly, by natural boundaries and/or lands owned by and/or in the possession of persons as follows:

Bounded on the west by State Road #1347; on the North by lands of the Turnage Farms, Inc.; on the east by Middle Swamp, and on the south by U.S. Highway #13 (formerly State Road 1346) and G. V. Lassiter, containing 113.9 acres, more or less, and designated as Lot #3-A, according to map of the "Division of lands among children of R. Lang Davis under the will of R. L. Davis," made by Jack McDavid, Jr., Registered Surveyor, in February 1957, in Map Book 2, Pages 76 and 77 of the Greene County Public Registry.

LESS AND EXCEPT those lots or parcels of land conveyed out of the above tract described as follows:

Excepted Parcel 1: Beginning at a concrete monument, the new Modlin corner on the north side of State Road #1346 (now included in U.S. Highway #13), and being 30 feet from the center thereof, and runs thence along the new Modlin line North 00 degrees 23 minutes West 555.6 feet to another concrete monument; thence North 89 degrees 37 minutes East 641.9 feet to another concrete monument on the Lassiter line; thence along the Lassiter line South 48 degrees 29 minutes West 486.4 feet to a stake; thence South 00 degrees 31 minutes East 31.5 feet to a stake at the head of a ditch; thence along the ditch South 30 degrees 18 minutes West 244.6 feet to a point on the north side of the aforesaid State Road #1346 (now included in U.S. Highway #13), being the corner of Mrs. G. V. Lassiter; thence along the right of way of the aforesaid road and 30 feet from the center thereof North 89 degrees 07 minutes West 143.7 feet; thence South 89 degrees 37 minutes West 6.3 feet to the point of beginning, containing 4.5 acres of land, according to map made by McDavid Associates in March 1966.

Excepted Parcel 2: That 1 ac tract or parcel of land depicted on a plat entitled "Minor Subdivision Julianna's Place" prepared by Calloway Geospatial PLLC, dated July 16, 2024 and recorded on July 25, 2024 in Plat Book 34, Page 147 of the Greene County Registry.

(the "Property"); and

WHEREAS, the cost of acquisition of the Property shall be \$15,000.00 per acre subject to certain annual price increases in accordance with the terms of the Option Agreements; and

WHEREAS, the cost of acquisition of the Property shall be funded through the Greene County General Funds and other sources that may become available during the term of the Option Agreements; and

WHEREAS, in accordance with the terms of N.C.G.S. 158-7.1, and further subject to the other terms and conditions hereinafter set forth, and such additional terms as the Greene County Board of Commissioners may impose following a public hearing, Greene County desires to acquire the Property.

WHEREAS, a public hearing on the approval of the acquisition of the Property was held at the Greene County Board of Commissioners regular meeting on January 6, 2025, at 10:00 a.m. .

NOW, THEREFORE, BE IT RESOLVED BY THE GREENE COUNTY BOARD OF COMMISSIONERS:

1. That the Board of Commissioners hereby approves, ratifies and affirms the Agreement attached hereto as Exhibits A.
2. That the County Manager is authorized to proceed on behalf of Greene County to acquire by Option to Purchase under the terms and conditions of Agreements.
3. That the County Attorney is hereby authorized and directed to prepare all documents to effectuate the acquisition of the interest in the land hereinabove mentioned.

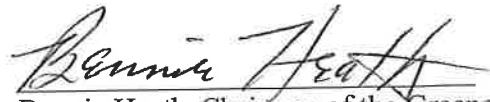
Adopted: This 6th day of January, 2025.



ATTEST:



Kyle J. DeHaven, Clerk to the Board



Bennie Heath, Chairman of the Greene County
Board of Commissioners

Resolution to Acquire Real Property – Frank Dail Farms Parcel 0500432

Exhibit A

GREENE COUNTY

LINE ITEM TRANSFER/BUDGET AMENDMENT

ARPA Funds III-B & III-C Services

DATE: 12-12-2024

DEPARTMENT: Greene County Senior Center

LINE ITEM TRANSFER					
FROM			TO		
Account Name	Acct #	Amount	Account Name	Acct #	Amount
Total		\$ -	Total		\$ -

BUDGET AMENDMENT					
REVENUES			EXPENDITURES		
Account Name	Acct #	Amount	Account Name	Acct #	Amount
ARPA Aging Services	11171-437911	\$ 36,860.00	Salaries	11590-510100	\$ 1,000.00
			Medicare	11590-513000	\$ 15.00
			FICA	11590-513100	\$ 62.00
			Retirement	11590-513200	\$ 129.00
			Supplies & Grocery cost	11590-517100	\$ 6,054.00
			Congregate Meals	11590-517800	\$ 10,000.00
			Van Transport Medical	11590-519100	\$ 12,600.00
			Contracted Services	11590-527500	\$ 5,000.00
			Equipment < \$5000	11590-530100	\$ 2,000.00
Total		\$ 36,860.00	Total		\$ 36,860.00

<u>Explanation:</u>	The Greene County Senior Center applied for ARPA Funds available through Eastern Carolina Council Area Agency on Aging. For III-B services, \$12600 was awarded for Medical Transportation, \$1206 Administrative, and \$5000 for Housing & Home Improvement. For III-C Services, \$10,000 was awarded for breakfasts, dinners, and weekend meal offerings for Congregate Clients. \$8000 will be used for client grocery boxes and Food Service Equipment. Total ARPA Funding: \$36,860
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Requested by:

Sharon Harrison

Approved by:

Sharon Harrison

**RESOLUTION APPROVING OFFER AND ACCEPTANCE
ADOPTING CAPITAL PROJECT BUDGET ORDINANCE
WATER SYSTEM ASSET INVENTORY AND ASSESSMENT
DIVISION OF WATER INFRASTRUCTURE
PROJECT AIA-D-0296
GREENE COUNTY**

WHEREAS, the North Carolina General Statutes Chapter 159G has created Asset Inventory and Assessment (AIA) grants to assist eligible units of government with meeting their water infrastructure needs, and

WHEREAS, the North Carolina Department of Environmental Quality has offered a State Reserve Grant in the amount of \$150,000 to perform an Asset Inventory and Assessment study detailed in the submitted application, and

WHEREAS, Greene County intends to perform said project in accordance with the agreed scope of work,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF GREENE COUNTY:

That Greene County does hereby accept the State Reserve Grant offer of \$150,000.

That Greene County does hereby give assurance to the North Carolina Department of Environmental Quality that any Conditions or Assurances contained in the Award Offer will be adhered to.

That Bennie Heath, Chairman, and successors so titled, is hereby authorized and directed to furnish such information as the appropriate State agency may request in connection with such application or the project; to make the assurances as contained above; and to execute such other documents as may be required by the Division of Water Infrastructure.

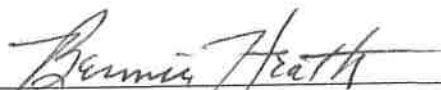
That the attached budget is hereby adopted.

Adopted this the 6th day of January 2025 at Snow Hill, North Carolina.

(Seal)

ATTEST:




Bennie Heath, Chairman
Greene County



Kyle J. DeHaven
Clerk to the Board

**CAPITAL PROJECT BUDGET ORDINANCE
GREENE COUNTY
WATER SYSTEM ASSET INVENTORY AND ASSESSMENT
AIA-D-0296**

		<u>BUDGET APPLICATION</u>	<u>CHANGES</u>	<u>APPROVED BUDGET</u>
<u>REVENUES</u>	<u>REVENUES - DWI Eligible</u>			
	State Reserve Asset Inventory Assessment Grant	\$150,000.00	\$0.00	\$150,000.00
	SUBTOTAL - DWI Eligible Revenues	\$150,000.00	\$0.00	\$150,000.00
	TOTAL REVENUES	\$150,000.00	\$0.00	\$150,000.00
<u>EXPENSES</u>	<u>EXPENSES - DWI ELIGIBLE</u>			
	Asset Inventory and Assessment			
	Water System AIA	\$150,000.00	\$0.00	\$150,000.00
	Subtotal - AIA	\$150,000.00	\$0.00	\$150,000.00
	TOTAL EXPENSES	\$150,000.00	\$0.00	\$150,000.00

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER INFRASTRUCTURE**

Funding Offer and Acceptance

Legal Name and Address of Award Subrecipient

Greene County
229 Kingold Boulevard, Suite D
Snow Hill, NC 28580

Project Number:

AIA-D-0296

UEID:

VCU5LD71N9U3

Funding Program

Drinking Water ☒	Wastewater ☐	Total Grant Offered
Distressed ☒	Not Distressed ☐	
SRP Asset Inventory & Assessment Grant (AIA)	☒	\$150,000
SRP Merger/Regionalization Feasibility Grant (MRF)	☐	

Project Name:

Greene County Water AIA

Total Financial Assistance Offer:

\$150,000

Match Percentage (0%)*:

\$0

1.5% Fee:**

\$ 2,250

**Local government units designated as distressed are subject to 0% match requirement.*

***1.5% fee is calculated based on the grant amount.*

Pursuant to North Carolina General Statute 159G:

- The Subrecipient is eligible under State law,
- The project is eligible under State law, and
- The project has been approved by the Department of Environmental Quality as having sufficient priority to receive financial assistance.

The Department of Environmental Quality, acting on behalf of the State of North Carolina, hereby offers the financial assistance described in this document.

For The State of North Carolina:

**Shadi Eskaf, Director, Division of Water Infrastructure
North Carolina Department of Environmental Quality**

DocuSigned by:  -----S2CD62E9DA8B44F----- Signature	12/19/2024 ----- Date
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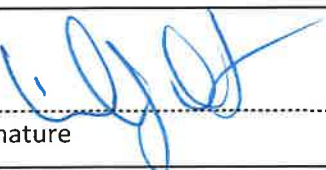
On Behalf of (Applicant):

Greene County

Name of Representative in Resolution:

Title (Type or Print):

I, the undersigned, being duly authorized to take such action, as evidenced by the attached CERTIFIED COPY OF AUTHORIZATION BY THE SUBRECIPIENT'S GOVERNING BODY, do hereby accept this Financial Award Offer and will comply with the Assurances and the Standard Conditions.

 ----- Signature	1-6-25 ----- Date
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STANDARD CONDITIONS AND ASSURANCES FOR SRP AIA GRANTS

1. The Subrecipient acknowledges that no disbursements will be made until the 1.5% fee has been received by the Division of Water Infrastructure (Division).
2. If the project is co-funded with federal funding sources (e.g., State Revolving Funds, CDBG-Infrastructure, American Rescue Plan Act), the conditions and assurances of the federal funding program will also apply.
3. The Subrecipient acknowledges that no disbursements will be made until applicable service agreements or contracts are submitted. The description of work listed on invoices must be included in the scope of work shown on the agreements or contracts.
4. All projects must comply with North Carolina General Statute 143-64.31, Article 3D Procurement of Architectural, Engineering, and Surveying Services. Any services provided that were not selected in compliance with state requirements will be ineligible for disbursement.
5. The Subrecipient is responsible for paying for ineligible project costs as determined by the Division.
6. The Subrecipient agrees to establish and maintain a financial management system that adequately accounts for revenues and expenditures. Adequate accounting and fiscal records must be maintained during the project and these records must be retained and made available for a period of at least three (3) years following completion of the project.
7. Partial disbursements will be made promptly upon request, subject to adequate documentation of incurred eligible costs and grant match, and subject to the Subrecipient's compliance with the conditions and assurances of this grant. Requests for disbursement must be made using the Division's disbursement form.
8. All funds provided pursuant to North Carolina General Statute 159G must be expended solely for carrying out the approved project, and an audit shall be performed in accordance with G.S. 159-34, as amended. **The Subrecipient must expend all of the requisitioned funds for the purpose of paying the costs of the project within three (3) banking days following the receipt of the funds from the State.** Please note that the State is not a party to any contract(s) and the Subrecipient is expected to uphold its contract obligations regarding timely payment.
9. The Subrecipient, if a local government unit or public authority, must comply with the requirements of NC GS 159-34 in having its accounts audited each fiscal year and to submit a copy of the audit report to the Secretary of the Local Government Commission by the established deadlines. Failure to comply with these requirements may result in delays in disbursement of the funds to the Subrecipient and/or the rescission of this Funding Offer.
10. Local government units designated as distressed must complete associated requirements of statute §159G-45(b).
11. The Subrecipient must provide summaries of project progress every other month during the project or as otherwise directed by the Division.
12. The Subrecipient must provide a digital copy of the final report in a universally readable format. If a project includes updating or developing a GIS database or shapefiles, at a minimum the current utility service boundaries must be provided as a polygon shapefile, including any service gaps within the boundary.
13. The Subrecipient must provide an executive level summary of the work performed, any conclusions made, and the next steps to be taken as a result of this work.
14. The Subrecipient must provide approved minutes or a resolution confirming the final report has been presented to the Subrecipient's governing board.
15. A maximum of 95% of the grant will be paid prior to receipt of the documentation described in Standard Condition and Assurance Nos. 12, 13, and 14. After receipt of this documentation, the final disbursement request will be processed.

GREENE COUNTY
Senior Center
BUDGET AMENDMENT
FY 24-25 Senior Center General Purpose
12/11/2024

LINE ITEM TRANSFER					
<u>FROM</u>			<u>TO</u>		
<u>Account Name</u>	<u>Acct #</u>	<u>Amount</u>	<u>Account Name</u>	<u>Acct #</u>	<u>Amount</u>

Requested by:
S. Harrison-Director
Greene Co. Senior Ctr.
12/11/2024

Approved by:


GREENE COUNTY 2024 CDBG-I PROGRAM EQUAL EMPLOYMENT OPPORTUNITY POLICY AND PLAN

WHEREAS, the County, as the recipient of federal funding through the Community Development Block Grant (CDBG) Grant program;

WHEREAS, Section 109 of Title 1 of the Housing and Community Development Act of 1974; Title VII of Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Age Discrimination Act of 1975; the Equal Employment Opportunity Act; the Immigration Reform and Control Act of 1986; the Vietnam Era Veterans' Readjustment Act of 1974, amended to Jobs for Veterans Act in 2002; Federal Executive Orders 11246, 11625, 12432, and 12138; Section 3 of the Housing and Urban Development Act of 1968; N.C.G.S. 126-16 (Equal Employment Opportunity); N.C.G.S. 143-422.2 (Equal Employment Practice Act); N.C.G.S. 168A-5-11 (Handicapped Persons Protection Act); N.C.G.S. 75B 1-7 (Discrimination in Business); N.C.G.S. 95-151(OSHA); N.C.G.S. 95-28.1; N.C.G.S. 127B-10-15 (Discrimination Against Military Personnel); N.C.G.S. 130A-148(i); N.C.G.S. 126-16; N.C.G.S. 143-48 and 143-128; and all applicable federal and other state regulations.

WHEREAS, the County maintains the policy of providing equal employment opportunities for all persons regardless of race, color, creed, religion, sex, national origin, physical or mental disability, age, genetic information, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupational qualifications for employment.

NOW THEREFORE, BE IT RESOLVED:

SECTION 1: In furtherance of this policy, the 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.

SECTION 2: The County shall 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.

SECTION 3: Responsibility for implementing equal opportunities and affirmative action measures is hereby assigned to the Chairmdan and/or other persons designated by the Chief Elected Official to assist in the implementation of this policy statement.

SECTION 4: The County shall develop a self-evaluation mechanism to provide periodic examination and evaluation. Every two years the results of the self-evaluation reporting on the progress of Equal Employment Opportunity and Affirmative Action will be presented to the Chief Elected Official. Records presented to the Chief Elected Official shall be maintained in the files and will be provided to NCDEQ/Division of Water Infrastructure as needed.

SECTION 5: The County is committed to this policy and is aware that with its implementation, the community will receive positive benefits through the greater utilization and development of all its human resources.

SECTION 6: The County shall include the Equal Employment Opportunity logo and/or the phrase affirming Equal Employment Opportunity on all the CDBG documents intended to be shared with the staff and the public.

SECTION 7: The County shall obtain commitment from contractors that they will not discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment. Contractors will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment. Such action shall include, but not be limited to the following: Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

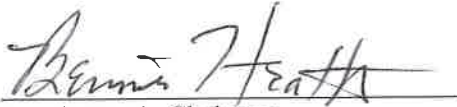
SECTION 8: The County shall obtain commitment from Contractors that will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive considerations for employment without regard to race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment.

Approved by the Greene County Board of Commissioners.

Adopted January 6, 2025, in Snow Hill, NC.



ATTEST:


Bennie Heath, Chairman


Kyle DeHaven, Clerk to the Board

This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWI requirements.

GREENE COUNTY 2024 CDBG-I CITIZEN PARTICIPATION PLAN & TEMPLATES

CDBG-I Recipient/Grantee Name:	<i>Greene County</i>
CDBG-I Recipient/Grantee Mailing Address:	<i>229 Kingold Blvd., Snow Hill, NC 28580</i>
CDBG-I Recipient/Grantee Physical Address (if different from mailing):	<i>same</i>
Contact Person & Title:	<i>Kyle DeHaven, County Manager</i>
Contact Email:	<i>kyle.dehaven@greencountync.gov</i>
Contact Phone Number:	<i>252.747.3446</i>
TDD#:	<i>711</i>

I. PURPOSE AND INTRODUCTION

The **County** has designed this community-wide Citizen Participation Plan to provide for and encourage citizen participation in the Community Development Block Grant (CDBG) program.

This Plan is an essential element of the **County's** present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by the North Carolina Department of Environmental Quality – Division of Water Infrastructure (NCDEQ-DWI) and the Department of Housing and Urban Development (HUD). The Citizen Participation Plan is required by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486(a)(6).

The primary goal of this Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of the **County's** CDBG program(s) and project(s).

The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.

The plan is vitally important to the success of CDBG-funded activities undertaken by local units of general government. Compliance with the plan reduces the number of legal challenges and citizen complaints against the local government recipient.

Local units of general government must provide citizens with reasonable advance notice of and opportunity to comment on proposed activities in an application to the state; and for grants already made, the same opportunities must be provided for activities proposed to be added, deleted, or substantially changed from the original application to the state. Substantially changes include, but not limited to, purpose, scope, location or beneficiaries.

Citizens are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program(s) will lie with the **County**.

2. SCOPE OF PARTICIPATION

The **County** will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG program(s) undertaken by the **County**. Local officials will make every effort to involve citizens in all phases of the development, implementation and assessment of community development programs including, but not limited to, the following phases:

- a. Identification and assessment of housing and community development needs; determination of CDBG project(s) and documentation; and the development of CDBG application(s);
- b. Changes and/or amendments to approved CDBG projects; and,
- c. Assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in an open manner. Citizens of the **County** are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

3. CITIZEN PARTICIPATION CONTACT PERSON

The **County Manager** has been designated Citizen Participation Coordinator by the **Chief Elected Official** and will serve as the contact person for all matters concerning citizen participation activities. This person shall be responsible for overseeing citizen participation throughout the community development process and the implementation of all citizen participation activities and functions, except those which may be specifically delegated to other parties by this Plan.

The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but not necessarily be limited to: disseminating information concerning proposed projects and the status of current project activities; coordinating various groups which may be participating in the community development process; receiving written comments; serving as a vehicle by which ideas, comments, and proposals from local residents may be transmitted to local officials and/or program staff; and, monitoring the citizen participation process and proposing such amendments to the Citizen Participation Plan as may be necessary.

The Citizen Participation Coordinator may be contacted at 229 Kingold Blvd., Snow Hill, NC / (252) 747-3446 during regular business hours. All questions concerning citizen participation in the community development process should be addressed to the Citizen Participation Coordinator.

4. TECHNICAL ASSISTANCE

The staff of the **County** shall provide technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG program(s).

Such technical assistance is intended to increase citizen participation in the community development decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of CDBG program requirements.

Technical assistance shall be provided on request and may include, but not necessarily be limited to: interpreting the CDBG program and its rules, regulations, procedures and/or requirements; providing information and/or materials concerning the CDBG program; and, assisting low and moderate income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

Technical assistance may be obtained by contacting the **Chief Elected Official** of the **County** or the Citizen Participation Coordinator.

5. PUBLIC HEARINGS

Citizen participation in the community development process will be conducted on a community-wide basis and will actively involve the views and proposals of all citizens, especially low and moderate income persons and residents of areas where CDBG activities are proposed or on-going.

Public hearings will be held during all phases of the community development process, as outlined herein, to allow citizens to voice opinions and offer proposals concerning the development and performance of CDBG programs. Local officials will respond to questions and proposals from citizens at each public hearing. Any questions that citizens may have concerning a program will be answered and their comments, suggestions, and/or proposals will be received. Citizens may also express comments and views concerning the community development process or any specific CDBG project to the governing body at any regularly scheduled meeting.

PUBLIC HEARING TIMES AND LOCATIONS

All public hearings will be held at times and locations which will be accessible to all citizens, especially persons of low and moderate incomes, and residents of blighted neighborhoods and CDBG project areas.

Public hearings will be scheduled for convenient times as determined by the **County**. Public hearings may be held at any site which, in the opinion of the **County** provides adequate access for citizen participation.

Hearings will normally be held at 312 SE Second Street, Snow Hill, NC 28580. This site is centrally located and generally accessible to all citizens. This building is also accessible to persons with disabilities. Hearings may, however, at the option of the **County**, be held at an alternate location to be specified in the public hearing notice(s).

APPLICATION PUBLIC HEARING

One public hearing shall be held during any CDBG program fiscal year prior to the submission of an application to the NCDEQ-DWI for CDBG assistance. The primary purposes of the public hearing shall be to assess community needs and problems in an effort to determine the most critical needs to be addressed by the CDBG program; and also, to present for public comment and review the program activities which have been selected by the **County** to resolve the identified needs.

An application public hearing will be held during the initial stage of program development to discuss items regarding community development and housing needs, the CDBG program, and the application process. The objective of citizen participation at this stage is to provide meaningful, community-wide citizen input into the decision-making process during the assessment of community needs and the consideration of priorities and options associated with the development and submission of a CDBG application. Local officials will also entertain proposals and comments from citizens concerning community development activities at this hearing.

This hearing will normally serve to discuss and review the information appropriate for all applications submitted by the **County** during any fiscal year. Additional changes in community development or housing needs in the community as determined by local officials can be addressed by a community meeting where citizens can share their comments prior to the submission of other CDBG applications late in the fiscal year.

Citizens will be provided with information concerning the CDBG program at this public hearing. Such information shall include, but not necessarily be limited to: the goals and objectives of the CDBG program; the total amount of CDBG funds available for the fiscal year and for the funding round; the role of citizens in program planning, implementation, and assessment; the range of activities which may be undertaken; the process to be followed in developing a CDBG application; a statement that 100 percent of the CDBG funds will be used to benefit low-to-moderate income people; the schedule of meetings and hearings; location where the application can be reviewed; activities previously funded in the **County** through the CDBG program; and, an identification of projects which could result in the relocation of area residences or businesses; and the actions that would be undertaken if such relocation were necessary; provide citizens with contact information such as address, telephone number, and dates for submitting complaints or grievances. Furthermore, the effectiveness of the Citizen Participation Plan in allowing citizen participation in the community development process and potential changes and/or amendments to the Plan shall also be discussed at this meeting.

The **County** may, at the option of local officials, review multiple CDBG project applications at one hearing when more than one application is to be submitted during the same fiscal year. Each such hearing shall be held prior to, and in preparation for, the application's approval by the **County**.

A second objective of citizen participation during this stage is to inform citizens of the proposed project activities to be included in a CDBG application(s) and to solicit comments from citizens concerning these activities.

Citizens attending this hearing will be provided with information concerning the CDBG project(s) proposed including, but not necessarily limited to: the project application(s) to be submitted and the applicable CDBG fund; specific project activities to be included; the location of the project activities; the approximate cost estimate for the proposed activities; the estimate of local match required; the impact of the project on low and moderate income persons; and, the approximate application submittal date.

PROJECT AMENDMENT PUBLIC HEARINGS

The **County** will assure the opportunity for citizen participation during the implementation of any CDBG program(s) when changes to the project are under consideration by the **County**. Citizen participation shall be obtained and considered in any amendments to a CDBG program which involves changes in dollar amount spent on any activity, changes in program beneficiaries, changes in the location of approved activities, addition to or deletion of project activities, and major budget shifts between approved activities.

To ensure adequate opportunity for citizen participation during CDBG programs, the **County** shall hold a public hearing on all formal amendments which require the NCDEQ-DWI approval. For "local" amendments and changes for which the NCDEQ-DWI approval is not required, input from citizens concerning changes or amendments will be received at regularly scheduled **County** meetings where such changes or amendments are considered.

ASSESSMENT OF PERFORMANCE (CLOSE-OUT) PUBLIC HEARINGS

This public hearing must be held after all third-party contracts' payments have been submitted.

Citizens of the **County** will be provided with the opportunity to comment on the performance of local officials, the **County** staff, consultants, engineers, and contractors, and the actual use of CDBG funds during the implementation of a CDBG program. Citizens will also be requested to assess the performance of the **County** in resolving identified community development and housing needs, and in achieving its community development goals and objectives. On-going community assessment of the effectiveness of the community development process is considered essential to the success of the CDBG program.

At the conclusion of each CDBG project, a public hearing will be held to review program activities and to assess program performance. This hearing shall be held prior to the submission of the Performance Assessment Report and any other required closeout documents to the NCDEQ-DWI for a CDBG project. This hearing will be used to ensure community-wide participation in the evaluation of the CDBG program.

ADDITIONAL HEARINGS

Other public hearings may be held as deemed necessary by the **County** to inform citizens of community development project(s) and activities, and to solicit citizen opinions and comments. All additional hearings shall comply with the requirements set forth in this Plan.

6. PUBLIC HEARING ACCOMMODATIONS AND ACCESSIBILITY

HYBRID HEARINGS

CDBG-I staff highly recommends local governments leverage online resources to hold hybrid public hearings. Hybrid public hearings provide for the ability of the public and interested parties to attend and participate in meetings without having to physically attend. This increases access of the hearings to additional citizens who would be otherwise unable to attend.

- Local governments may use online platforms to hold hybrid hearings that facilitate public access to all questions and responses and provide timely responses from local officials.
 - Hybrid hearing methods could include but are not limited to, Google Hangouts, Adobe Connect, Facebook Live, a video streaming service (WebEx, Zoom, youtube, etc.), local community television stations, live streaming on county/city website, or other virtual platforms can help accommodate these meetings. A call-in option that does not require internet connection is strongly recommended.
- All hybrid hearings held shall provide reasonable notification and access for citizens, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- Local governments must take appropriate actions to encourage the participation of all residents, including the elderly, minorities, persons with limited English proficiency, as well as persons with disabilities. Therefore, a hybrid hearing method or platform that is selected must provide appropriate accommodations made for those individuals that may not be able to physically attend the meeting.
- Whether hearings are in-person or hybrid, local governments must take appropriate steps to ensure effective communication with persons with disabilities consistent with the requirements of accessibility laws, such as Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.
 - Thus, a local government must provide appropriate auxiliary aids and services where necessary to afford individuals with hearing and vision impairments an equal opportunity to access and participate in such hearings.
 - These may include effective methods that make verbally delivered information available to individuals who are deaf or hard of hearing, and visually delivered materials available to individuals who are blind or have low vision.
 - The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place.
 - In determining what types of auxiliary aids and services are necessary, a local government shall give primary consideration to the requests of individuals with disabilities. In order to be effective, auxiliary aids and services should be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.
 - For hybrid hearings, such steps should include ensuring that information is provided on an accessible website, that e-mails and other digital notifications are accessible, and that the application or platform used to host the hearing is also accessible. Additional services such as audio description or captioning may also be needed to provide effective

communication in a digital context.

- There are some helpful guidelines for ensuring the accessibility of web-based and digital materials are available through the World Wide Web Consortium's Web Accessibility Initiative at <https://www.w3.org/WAI/>. Examples of auxiliary aids and services that may be necessary when conducting hearings online can be found at 28 CFR 35.104.
- Local governments are highly encouraged to use various forms of social media, and we will accept public comments in written form (i.e. emailed comments, mailed, comments collected via social media, and other communication types made possible by web-based platforms or digital materials).
- Local governments must document their efforts and the reason for them and update their citizen participation plans as soon as possible to add the use of virtual hearings if the plan doesn't already mention them.
- Additional information on public hearing requirements can be found in Appendix B: Public Hearings.
- Local governments should consult with their attorney before undertaking such meetings to ensure conformance with the NC Senate Bill 704.

Additional legal resources are:

- Session Law 2020-3: Act to Provide Aid to North Carolinians in Response to the Coronavirus Disease 2019 (COVID-19)
<https://www.ncleg.gov/Sessions/2019/Bills/Senate/PDF/S704v6.pdf>
- School of Government's summary of Session Law 2020-3: <https://canons.sog.unc.edu/new-rules-for-meetings-of-public-bodies-during-state-level-declared-emergencies/>

LIMITED ENGLISH PROFICIENCY RESIDENTS

The **County** has followed the guidance provided in the Language Access Plan (LAP) to determine the need to undertake reasonable actions to facilitate the participation of persons with Limited English Proficiency. Local officials will undertake all reasonable actions necessary to allow such persons to participate in the community development process. Such actions may include the provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency.

PUBLIC HEARING NOTICE

Notice of public hearings must be published in a local newspaper of general circulation, in a non-legal section of the paper at least ten (10) days prior to the hearing date, but no more than 25 days prior to the meeting date. Each notice of a hearing shall include the time, date, place, and topics and procedures to be discussed.

ACCESSIBILITY TO LOW-MODERATE INCOME PERSONS

The public hearing procedures outlined herein are designed to promote participation by low and moderate income citizens, as well as residents of blighted neighborhoods and CDBG project areas in any public hearing(s).

Local officials may take additional steps to further promote participation by such groups, or to target program information to these persons should officials feel that such persons may otherwise be excluded or should additional action be deemed necessary.

Activities to promote additional participation may include: posting of notices in blighted neighborhoods and in places frequented by low and moderate income persons, and holding public hearings in low and moderate income neighborhoods or areas of existing or proposed CDBG project activities.

ACCESSIBILITY TO PERSONS WITH DISABILITIES

The locations of all public hearings as described herein shall be made accessible to persons with disabilities. The **County** shall provide a sign language interpreter whenever the Citizen Participation Coordinator is notified in advance that one or more deaf persons will be in attendance.

The **County** shall provide a qualified reader whenever the Citizen Participation Coordinator is notified in advance that one or more visually impaired persons will be in attendance.

Additionally, the **County** shall provide reasonable accommodations whenever the Citizen Participation Coordinator is notified in advance that one or more persons with mobility or developmental disabilities will be in attendance.

7. PROGRAM INFORMATION

Citizens will be provided full access to CDBG program information during all phases of a CDBG project. Local officials of the **County** shall make reasonable effort to assure that CDBG program information is available to all citizens, especially those of low and moderate incomes and those residing in blighted or Limited English Proficiency neighborhoods and/or CDBG project areas.

To facilitate citizen access to CDBG program information, the Citizen Participation Coordinator will keep all documents related to a CDBG program on file in the **location**. Information from the project files shall be made available for examination and duplication, on request, during regular business hours. CDBG program information and materials, concerning specific CDBG projects will be available and distributed to the public at the regularly scheduled public hearings as outlined in this Plan. Furthermore, information concerning any CDBG project will be available at regularly scheduled council meetings where the program is discussed.

Materials to be made available shall include, but are not necessarily limited to: the Citizen Participation Plan; records of public hearing; mailings and promotional materials; prior CDBG program applications; letters of approval; grant agreements; the environmental review record; financial and procurement records; project design and construction specifications; labor standards materials; performance and evaluation reports; other reports required by the NCDEQ-DWI and/or HUD; proposed and approved CDBG program application(s) for the current year or project; written comments or complaints received concerning the community development program, and written responses from the **County**; and, copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the CDBG program.

In no case shall the **County** disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the **County** shall not disclose any information which may, in the opinion of the **Chief Elected Official**, be deemed of a confidential nature.

8. PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS

The public hearings scheduled, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the community development process. Citizens are encouraged to submit their views and proposals on all aspects of a community development program at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the community development program on a continuous basis, citizens may, at any time, submit written comments or complaints to the **County**.

Any citizen or citizen's group desiring to comment or object to any phase of the planning, development or approval of the application for CDBG funds, or to the implementation of any CDBG program, should submit such comments or objections in writing to the **Chief Elected Official**. Should, after a reasonable period, a party believe that his/her comment or complaint has not been properly addressed or considered by the **Chief Elected Official**, then the aggrieved may appeal his/her case to the **County**.

Local officials shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable. Should the **County** be unable to sufficiently resolve an objection or complaint, it may be forwarded by the aggrieved party to the NCDEQ-DWI. Citizens may, at any time, contact the NCDEQ-DWI and/or HUD directly to register comments, objections or complaints concerning the **County** CDBG application(s) and/or program(s). Citizens are encouraged, however, to attempt to resolve any complaints at the local level as outlined above prior to contacting the NCDEQ-DWI or HUD.

All comments or complaints submitted to the NCDEQ-DWI or the HUD shall be addressed in writing to:

NC Department of Environmental Quality
Division of Water Infrastructure / CDBG-I Unit
1633 Mail Service Center
Raleigh, North Carolina 27699-1633

U.S. Department of Housing and Urban Development
Community Planning and Development Division
Greensboro Field Office
1500 Pinecroft Road
Greensboro, North Carolina 27407

Records of all comments, objections and/or complaints by citizens concerning the **County** CDBG program and subsequent action taken in response to those comments shall be maintained on file at **County** and shall be made available for public inspection upon request.

9. AMENDMENTS

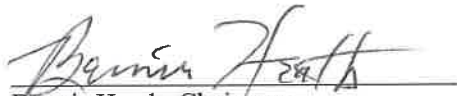
The **County** may, from time to time, modify the provisions outlined herein through amendment to this Citizen Participation Plan. It shall be the policy of the **County** to periodically review and discuss the effectiveness of this Citizen Participation Plan in allowing citizen participation in the community development process and in helping to meet the community development needs and goals identified by the citizens of the **County**. To this end, the effectiveness of the Plan will be discussed at public hearings held in conjunction with the community development program as discussed herein, and potential amendments to the Plan will be reviewed at this time.

Amendments to the Plan will be made as necessary. All amendments shall be approved by resolution of the **County** and shall be incorporated into this Plan.

10. AUTHORITY

No portion of this Citizen Participation Plan shall be construed to restrict the responsibility and authority of the elected officials of the **County** in the development, implementation and execution of any Community Development Block Grant program.

ADOPTED January 6, 2025, at Snow Hill, NC.


Bennie Heath, Chairman

ATTEST:


Kyle DeHaven, County Manager



This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWI requirements.

Pages from the following pages to the end are templates provided by DWI.

GREENE COUNTY 2024 CDBG-I PROGRAM CODE OF CONDUCT POLICY

WHEREAS, Greene County, as the recipient of federal funding through the Community Development Block Grant (CDBG) Grant program;

WHEREAS, the conflict of interest provisions, including but not limited to those found at N.C. General Statutes § 14-234, 2 C.F.R. § 200.317-318, 320-321, 323-326, 24 C.F.R. § 570.489 (g) and (h), and 24 C.F.R. § 570.611 must be carried out;

WHEREAS, certain limited exceptions to the conflict of interest rules listed in 24 C.F.R. § 570.489 may be granted in writing by Housing and Urban Development (HUD) and/or NCDEQ upon written request and the provision of information specified in 24 C.F.R. § 570.489(h)(ii)(4);

WHEREAS, no persons described in this policy who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter;

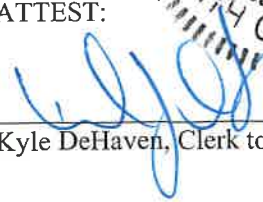
WHEREAS, the conflict of interest provisions of this policy apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds; and

WHEREAS, the failure to adhere and enforce this policy may cause Greene County to lose its grant or eligibility for future federal grants;

NOW THEREFORE, BE IT RESOLVED, by Greene County Board of Commissioners Greene County has approved and will adhere to this policy.

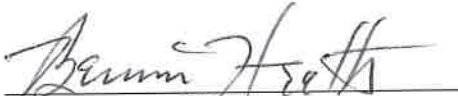
Adopted January 13, 2025, in Snow Hill, North Carolina.

ATTEST:



Kyle DeHaven, Clerk to the Board





Bennie Heath, Chairman

This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWT requirements.

GREENE COUNTY 2024 CDBG-I PROGRAM EQUAL EMPLOYMENT OPPORTUNITY POLICY AND PLAN

WHEREAS, the County, as the recipient of federal funding through the Community Development Block Grant (CDBG) Grant program;

WHEREAS, Section 109 of Title 1 of the Housing and Community Development Act of 1974; Title VII of Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Age Discrimination Act of 1975; the Equal Employment Opportunity Act; the Immigration Reform and Control Act of 1986; the Vietnam Era Veterans' Readjustment Act of 1974, amended to Jobs for Veterans Act in 2002; Federal Executive Orders 11246, 11625, 12432, and 12138; Section 3 of the Housing and Urban Development Act of 1968; N.C.G.S. 126-16 (Equal Employment Opportunity); N.C.G.S. 143-422.2 (Equal Employment Practice Act); N.C.G.S. 168A-5-11 (Handicapped Persons Protection Act); N.C.G.S. 75B 1-7 (Discrimination in Business); N.C.G.S. 95-151(OSHA); N.C.G.S. 95-28.1; N.C.G.S. 127B-10-15 (Discrimination Against Military Personnel); N.C.G.S. 130A-148(i); N.C.G.S. 126-16; N.C.G.S. 143-48 and 143-128; and all applicable federal and other state regulations.

WHEREAS, the County maintains the policy of providing equal employment opportunities for all persons regardless of race, color, creed, religion, sex, national origin, physical or mental disability, age, genetic information, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupational qualifications for employment.

NOW THEREFORE, BE IT RESOLVED:

SECTION 1: In furtherance of this policy, the 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.

SECTION 2: The County shall 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.

SECTION 3: Responsibility for implementing equal opportunities and affirmative action measures is hereby assigned to the Chairmdan and/or other persons designated by the Chief Elected Official to assist in the implementation of this policy statement.

SECTION 4: The County shall develop a self-evaluation mechanism to provide periodic examination and evaluation. Every two years the results of the self-evaluation reporting on the progress of Equal Employment Opportunity and Affirmative Action will be presented to the Chief Elected Official. Records presented to the Chief Elected Official shall be maintained in the files and will be provided to NCDEQ/Division of Water Infrastructure as needed.

SECTION 5: The County is committed to this policy and is aware that with its implementation, the community will receive positive benefits through the greater utilization and development of all its human resources.

SECTION 6: The County shall include the Equal Employment Opportunity logo and/or the phrase affirming Equal Employment Opportunity on all the CDBG documents intended to be shared with the staff and the public.

SECTION 7: The County shall obtain commitment from contractors that they will not discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment. Contractors will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment. Such action shall include, but not be limited to the following: Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

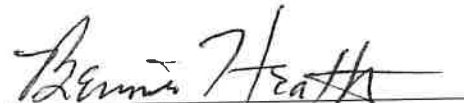
SECTION 8: The County shall obtain commitment from Contractors that will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive considerations for employment without regard to race, color, religion, sex, national origin, physical or mental disability, age, political affiliation, or any other non-merit factor, except where religion, sex, national origin, or age are bona fide occupation qualifications for employment.

Approved by the Greene County Board of Commissioners.

Adopted January 6, 2025, in Snow Hill, NC.



ATTEST:


Bennie Heath, Chairman



Kyle DeHaven, Clerk to the Board

This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWI requirements.

GREENE COUNTY 2024 CDBG-I CITIZEN PARTICIPATION PLAN & TEMPLATES

CDBG-I Recipient/Grantee Name:	<i>Greene County</i>
CDBG-I Recipient/Grantee Mailing Address:	<i>229 Kingold Blvd., Snow Hill, NC 28580</i>
CDBG-I Recipient/Grantee Physical Address (if different from mailing):	<i>same</i>
Contact Person & Title:	<i>Kyle DeHaven, County Manager</i>
Contact Email:	<i>kyle.dehaven@greencountync.gov</i>
Contact Phone Number:	<i>252.747.3446</i>
TDD#:	<i>711</i>

I. PURPOSE AND INTRODUCTION

The **County** has designed this community-wide Citizen Participation Plan to provide for and encourage citizen participation in the Community Development Block Grant (CDBG) program.

This Plan is an essential element of the **County's** present and future community development process and has been developed to comply with the regulations and requirements of the CDBG program as administered by the North Carolina Department of Environmental Quality – Division of Water Infrastructure (NCDEQ-DWI) and the Department of Housing and Urban Development (HUD). The Citizen Participation Plan is required by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486(a)(6).

The primary goal of this Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of the **County's** CDBG program(s) and project(s).

The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, residents of blighted neighborhoods, and residents of areas where community development funds are utilized.

The plan is vitally important to the success of CDBG-funded activities undertaken by local units of general government. Compliance with the plan reduces the number of legal challenges and citizen complaints against the local government recipient.

Local units of general government must provide citizens with reasonable advance notice of and opportunity to comment on proposed activities in an application to the state; and for grants already made, the same opportunities must be provided for activities proposed to be added, deleted, or substantially changed from the original application to the state. Substantially changes include, but not limited to, purpose, scope, location or beneficiaries.

Citizens are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program(s) will lie with the **County**.

2. SCOPE OF PARTICIPATION

The **County** will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG program(s) undertaken by the **County**. Local officials will make every effort to involve citizens in all phases of the development, implementation and assessment of community development programs including, but not limited to, the following phases:

- a. Identification and assessment of housing and community development needs; determination of CDBG project(s) and documentation; and the development of CDBG application(s);
- b. Changes and/or amendments to approved CDBG projects; and,
- c. Assessment of CDBG program performance.

All phases of the community development process will be conducted by local officials in an open manner. Citizens of the **County** are encouraged to participate at all levels and will be given access to program information during each phase of any CDBG program as outlined herein.

3. CITIZEN PARTICIPATION CONTACT PERSON

The **County Manager** has been designated Citizen Participation Coordinator by the **Chief Elected Official** and will serve as the contact person for all matters concerning citizen participation activities. This person shall be responsible for overseeing citizen participation throughout the community development process and the implementation of all citizen participation activities and functions, except those which may be specifically delegated to other parties by this Plan.

The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but not necessarily be limited to: disseminating information concerning proposed projects and the status of current project activities; coordinating various groups which may be participating in the community development process; receiving written comments; serving as a vehicle by which ideas, comments, and proposals from local residents may be transmitted to local officials and/or program staff; and, monitoring the citizen participation process and proposing such amendments to the Citizen Participation Plan as may be necessary.

The Citizen Participation Coordinator may be contacted at 229 Kingold Blvd., Snow Hill, NC / (252) 747-3446 during regular business hours. All questions concerning citizen participation in the community development process should be addressed to the Citizen Participation Coordinator.

4. TECHNICAL ASSISTANCE

The staff of the **County** shall provide technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG program(s).

Such technical assistance is intended to increase citizen participation in the community development decision making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of CDBG program requirements.

Technical assistance shall be provided on request and may include, but not necessarily be limited to: interpreting the CDBG program and its rules, regulations, procedures and/or requirements; providing information and/or materials concerning the CDBG program; and, assisting low and moderate income citizens, and residents of blighted neighborhoods to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

Technical assistance may be obtained by contacting the **Chief Elected Official** of the **County** or the Citizen Participation Coordinator.

5. PUBLIC HEARINGS

Citizen participation in the community development process will be conducted on a community-wide basis and will actively involve the views and proposals of all citizens, especially low and moderate income persons and residents of areas where CDBG activities are proposed or on-going.

Public hearings will be held during all phases of the community development process, as outlined herein, to allow citizens to voice opinions and offer proposals concerning the development and performance of CDBG programs. Local officials will respond to questions and proposals from citizens at each public hearing. Any questions that citizens may have concerning a program will be answered and their comments, suggestions, and/or proposals will be received. Citizens may also express comments and views concerning the community development process or any specific CDBG project to the governing body at any regularly scheduled meeting.

PUBLIC HEARING TIMES AND LOCATIONS

All public hearings will be held at times and locations which will be accessible to all citizens, especially persons of low and moderate incomes, and residents of blighted neighborhoods and CDBG project areas.

Public hearings will be scheduled for convenient times as determined by the **County**. Public hearings may be held at any site which, in the opinion of the **County** provides adequate access for citizen participation.

Hearings will normally be held at 312 SE Second Street, Snow Hill, NC 28580. This site is centrally located and generally accessible to all citizens. This building is also accessible to persons with disabilities. Hearings may, however, at the option of the **County**, be held at an alternate location to be specified in the public hearing notice(s).

APPLICATION PUBLIC HEARING

One public hearing shall be held during any CDBG program fiscal year prior to the submission of an application to the NCDEQ-DWI for CDBG assistance. The primary purposes of the public hearing shall be to assess community needs and problems in an effort to determine the most critical needs to be addressed by the CDBG program; and also, to present for public comment and review the program activities which have been selected by the **County** to resolve the identified needs.

An application public hearing will be held during the initial stage of program development to discuss items regarding community development and housing needs, the CDBG program, and the application process. The objective of citizen participation at this stage is to provide meaningful, community-wide citizen input into the decision-making process during the assessment of community needs and the consideration of priorities and options associated with the development and submission of a CDBG application. Local officials will also entertain proposals and comments from citizens concerning community development activities at this hearing.

This hearing will normally serve to discuss and review the information appropriate for all applications submitted by the **County** during any fiscal year. Additional changes in community development or housing needs in the community as determined by local officials can be addressed by a community meeting where citizens can share their comments prior to the submission of other CDBG applications late in the fiscal year.

Citizens will be provided with information concerning the CDBG program at this public hearing. Such information shall include, but not necessarily be limited to: the goals and objectives of the CDBG program; the total amount of CDBG funds available for the fiscal year and for the funding round; the role of citizens in program planning, implementation, and assessment; the range of activities which may be undertaken; the process to be followed in developing a CDBG application; a statement that 100 percent of the CDBG funds will be used to benefit low-to-moderate income people; the schedule of meetings and hearings; location where the application can be reviewed; activities previously funded in the **County** through the CDBG program; and, an identification of projects which could result in the relocation of area residences or businesses; and the actions that would be undertaken if such relocation were necessary; provide citizens with contact information such as address, telephone number, and dates for submitting complaints or grievances. Furthermore, the effectiveness of the Citizen Participation Plan in allowing citizen participation in the community development process and potential changes and/or amendments to the Plan shall also be discussed at this meeting.

The **County** may, at the option of local officials, review multiple CDBG project applications at one hearing when more than one application is to be submitted during the same fiscal year. Each such hearing shall be held prior to, and in preparation for, the application's approval by the **County**.

A second objective of citizen participation during this stage is to inform citizens of the proposed project activities to be included in a CDBG application(s) and to solicit comments from citizens concerning these activities.

Citizens attending this hearing will be provided with information concerning the CDBG project(s) proposed including, but not necessarily limited to: the project application(s) to be submitted and the applicable CDBG fund; specific project activities to be included; the location of the project activities; the approximate cost estimate for the proposed activities; the estimate of local match required; the impact of the project on low and moderate income persons; and, the approximate application submittal date.

PROJECT AMENDMENT PUBLIC HEARINGS

The **County** will assure the opportunity for citizen participation during the implementation of any CDBG program(s) when changes to the project are under consideration by the **County**. Citizen participation shall be obtained and considered in any amendments to a CDBG program which involves changes in dollar amount spent on any activity, changes in program beneficiaries, changes in the location of approved activities, addition to or deletion of project activities, and major budget shifts between approved activities.

To ensure adequate opportunity for citizen participation during CDBG programs, the **County** shall hold a public hearing on all formal amendments which require the NCDEQ-DWI approval. For "local" amendments and changes for which the NCDEQ-DWI approval is not required, input from citizens concerning changes or amendments will be received at regularly scheduled **County** meetings where such changes or amendments are considered.

ASSESSMENT OF PERFORMANCE (CLOSE-OUT) PUBLIC HEARINGS

This public hearing must be held after all third-party contracts' payments have been submitted.

Citizens of the **County** will be provided with the opportunity to comment on the performance of local officials, the **County** staff, consultants, engineers, and contractors, and the actual use of CDBG funds during the implementation of a CDBG program. Citizens will also be requested to assess the performance of the **County** in resolving identified community development and housing needs, and in achieving its community development goals and objectives. On-going community assessment of the effectiveness of the community development process is considered essential to the success of the CDBG program.

At the conclusion of each CDBG project, a public hearing will be held to review program activities and to assess program performance. This hearing shall be held prior to the submission of the Performance Assessment Report and any other required closeout documents to the NCDEQ-DWI for a CDBG project. This hearing will be used to ensure community-wide participation in the evaluation of the CDBG program.

ADDITIONAL HEARINGS

Other public hearings may be held as deemed necessary by the **County** to inform citizens of community development project(s) and activities, and to solicit citizen opinions and comments. All additional hearings shall comply with the requirements set forth in this Plan.

6. PUBLIC HEARING ACCOMMODATIONS AND ACCESSIBILITY

HYBRID HEARINGS

CDBG-I staff highly recommends local governments leverage online resources to hold hybrid public hearings. Hybrid public hearings provide for the ability of the public and interested parties to attend and participate in meetings without having to physically attend. This increases access of the hearings to additional citizens who would be otherwise unable to attend.

- Local governments may use online platforms to hold hybrid hearings that facilitate public access to all questions and responses and provide timely responses from local officials.
 - Hybrid hearing methods could include but are not limited to, Google Hangouts, Adobe Connect, Facebook Live, a video streaming service (WebEx, Zoom, youtube, etc.), local community television stations, live streaming on county/city website, or other virtual platforms can help accommodate these meetings. A call-in option that does not require internet connection is strongly recommended.
- All hybrid hearings held shall provide reasonable notification and access for citizens, timely responses from local officials to all citizen questions and issues, and public access to all questions and responses.
- Local governments must take appropriate actions to encourage the participation of all residents, including the elderly, minorities, persons with limited English proficiency, as well as persons with disabilities. Therefore, a hybrid hearing method or platform that is selected must provide appropriate accommodations made for those individuals that may not be able to physically attend the meeting.
- Whether hearings are in-person or hybrid, local governments must take appropriate steps to ensure effective communication with persons with disabilities consistent with the requirements of accessibility laws, such as Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.
 - Thus, a local government must provide appropriate auxiliary aids and services where necessary to afford individuals with hearing and vision impairments an equal opportunity to access and participate in such hearings.
 - These may include effective methods that make verbally delivered information available to individuals who are deaf or hard of hearing, and visually delivered materials available to individuals who are blind or have low vision.
 - The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place.
 - In determining what types of auxiliary aids and services are necessary, a local government shall give primary consideration to the requests of individuals with disabilities. In order to be effective, auxiliary aids and services should be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability.
 - For hybrid hearings, such steps should include ensuring that information is provided on an accessible website, that e-mails and other digital notifications are accessible, and that the application or platform used to host the hearing is also accessible. Additional services such as audio description or captioning may also be needed to provide effective

communication in a digital context.

- There are some helpful guidelines for ensuring the accessibility of web-based and digital materials are available through the World Wide Web Consortium's Web Accessibility Initiative at <https://www.w3.org/WAI/>. Examples of auxiliary aids and services that may be necessary when conducting hearings online can be found at 28 CFR 35.104.
- Local governments are highly encouraged to use various forms of social media, and we will accept public comments in written form (i.e. emailed comments, mailed, comments collected via social media, and other communication types made possible by web-based platforms or digital materials).
- Local governments must document their efforts and the reason for them and update their citizen participation plans as soon as possible to add the use of virtual hearings if the plan doesn't already mention them.
- Additional information on public hearing requirements can be found in Appendix B: Public Hearings.
- Local governments should consult with their attorney before undertaking such meetings to ensure conformance with the NC Senate Bill 704.

Additional legal resources are:

- Session Law 2020-3: Act to Provide Aid to North Carolinians in Response to the Coronavirus Disease 2019 (COVID-19)
<https://www.ncleg.gov/Sessions/2019/Bills/Senate/PDF/S704v6.pdf>
- School of Government's summary of Session Law 2020-3: <https://canons.sog.unc.edu/new-rules-for-meetings-of-public-bodies-during-state-level-declared-emergencies/>

LIMITED ENGLISH PROFICIENCY RESIDENTS

The **County** has followed the guidance provided in the Language Access Plan (LAP) to determine the need to undertake reasonable actions to facilitate the participation of persons with Limited English Proficiency. Local officials will undertake all reasonable actions necessary to allow such persons to participate in the community development process. Such actions may include the provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency.

PUBLIC HEARING NOTICE

Notice of public hearings must be published in a local newspaper of general circulation, in a non-legal section of the paper at least ten (10) days prior to the hearing date, but no more than 25 days prior to the meeting date. Each notice of a hearing shall include the time, date, place, and topics and procedures to be discussed.

ACCESSIBILITY TO LOW-MODERATE INCOME PERSONS

The public hearing procedures outlined herein are designed to promote participation by low and moderate income citizens, as well as residents of blighted neighborhoods and CDBG project areas in any public hearing(s).

Local officials may take additional steps to further promote participation by such groups, or to target program information to these persons should officials feel that such persons may otherwise be excluded or should additional action be deemed necessary.

Activities to promote additional participation may include: posting of notices in blighted neighborhoods and in places frequented by low and moderate income persons, and holding public hearings in low and moderate income neighborhoods or areas of existing or proposed CDBG project activities.

ACCESSIBILITY TO PERSONS WITH DISABILITIES

The locations of all public hearings as described herein shall be made accessible to persons with disabilities. The **County** shall provide a sign language interpreter whenever the Citizen Participation Coordinator is notified in advance that one or more deaf persons will be in attendance.

The **County** shall provide a qualified reader whenever the Citizen Participation Coordinator is notified in advance that one or more visually impaired persons will be in attendance.

Additionally, the **County** shall provide reasonable accommodations whenever the Citizen Participation Coordinator is notified in advance that one or more persons with mobility or developmental disabilities will be in attendance.

7. PROGRAM INFORMATION

Citizens will be provided full access to CDBG program information during all phases of a CDBG project. Local officials of the **County** shall make reasonable effort to assure that CDBG program information is available to all citizens, especially those of low and moderate incomes and those residing in blighted or Limited English Proficiency neighborhoods and/or CDBG project areas.

To facilitate citizen access to CDBG program information, the Citizen Participation Coordinator will keep all documents related to a CDBG program on file in the **location**. Information from the project files shall be made available for examination and duplication, on request, during regular business hours. CDBG program information and materials, concerning specific CDBG projects will be available and distributed to the public at the regularly scheduled public hearings as outlined in this Plan. Furthermore, information concerning any CDBG project will be available at regularly scheduled council meetings where the program is discussed.

Materials to be made available shall include, but are not necessarily limited to: the Citizen Participation Plan; records of public hearing; mailings and promotional materials; prior CDBG program applications; letters of approval; grant agreements; the environmental review record; financial and procurement records; project design and construction specifications; labor standards materials; performance and evaluation reports; other reports required by the NCDEQ-DWI and/or HUD; proposed and approved CDBG program application(s) for the current year or project; written comments or complaints received concerning the community development program, and written responses from the **County**; and, copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the CDBG program.

In no case shall the **County** disclose any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, the **County** shall not disclose any information which may, in the opinion of the **Chief Elected Official**, be deemed of a confidential nature.

8. PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS

The public hearings scheduled, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the community development process. Citizens are encouraged to submit their views and proposals on all aspects of a community development program at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the community development program on a continuous basis, citizens may, at any time, submit written comments or complaints to the **County**.

Any citizen or citizen's group desiring to comment or object to any phase of the planning, development or approval of the application for CDBG funds, or to the implementation of any CDBG program, should submit such comments or objections in writing to the **Chief Elected Official**. Should, after a reasonable period, a party believe that his/her comment or complaint has not been properly addressed or considered by the **Chief Elected Official**, then the aggrieved may appeal his/her case to the **County**.

Local officials shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable. Should the **County** be unable to sufficiently resolve an objection or complaint, it may be forwarded by the aggrieved party to the NCDEQ-DWI. Citizens may, at any time, contact the NCDEQ-DWI and/or HUD directly to register comments, objections or complaints concerning the **County** CDBG application(s) and/or program(s). Citizens are encouraged, however, to attempt to resolve any complaints at the local level as outlined above prior to contacting the NCDEQ-DWI or HUD.

All comments or complaints submitted to the NCDEQ-DWI or the HUD shall be addressed in writing to:

NC Department of Environmental Quality
Division of Water Infrastructure / CDBG-I Unit
1633 Mail Service Center
Raleigh, North Carolina 27699-1633

U.S. Department of Housing and Urban Development
Community Planning and Development Division
Greensboro Field Office
1500 Pinecroft Road
Greensboro, North Carolina 27407

Records of all comments, objections and/or complaints by citizens concerning the **County** CDBG program and subsequent action taken in response to those comments shall be maintained on file at **County** and shall be made available for public inspection upon request.

9. AMENDMENTS

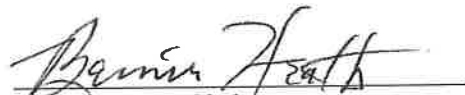
The **County** may, from time to time, modify the provisions outlined herein through amendment to this Citizen Participation Plan. It shall be the policy of the **County** to periodically review and discuss the effectiveness of this Citizen Participation Plan in allowing citizen participation in the community development process and in helping to meet the community development needs and goals identified by the citizens of the **County**. To this end, the effectiveness of the Plan will be discussed at public hearings held in conjunction with the community development program as discussed herein, and potential amendments to the Plan will be reviewed at this time.

Amendments to the Plan will be made as necessary. All amendments shall be approved by resolution of the **County** and shall be incorporated into this Plan.

10. AUTHORITY

No portion of this Citizen Participation Plan shall be construed to restrict the responsibility and authority of the elected officials of the **County** in the development, implementation and execution of any Community Development Block Grant program.

ADOPTED January 6, 2025, at Snow Hill, NC.


Bennie Heath, Chairman

ATTEST:


Kyle DeHaven, County Manager



This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWI requirements.

Pages from the following pages to the end are templates provided by DWI.

GREENE COUNTY 2024 CDBG-I PROGRAM CODE OF CONDUCT POLICY

WHEREAS, Greene County, as the recipient of federal funding through the Community Development Block Grant (CDBG) Grant program;

WHEREAS, the conflict of interest provisions, including but not limited to those found at N.C. General Statutes § 14-234, 2 C.F.R. § 200.317-318, 320-321, 323-326, 24 C.F.R. § 570.489 (g) and (h), and 24 C.F.R. § 570.611 must be carried out;

WHEREAS, certain limited exceptions to the conflict of interest rules listed in 24 C.F.R. § 570.489 may be granted in writing by Housing and Urban Development (HUD) and/or NCDEQ upon written request and the provision of information specified in 24 C.F.R. § 570.489(h)(ii)(4);

WHEREAS, no persons described in this policy who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter;

WHEREAS, the conflict of interest provisions of this policy apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds; and

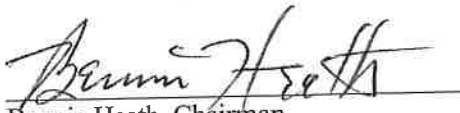
WHEREAS, the failure to adhere and enforce this policy may cause Greene County to lose its grant or eligibility for future federal grants;

NOW THEREFORE, BE IT RESOLVED, by Greene County Board of Commissioners Greene County has approved and will adhere to this policy.

Adopted January 2025, in Snow Hill, North Carolina.

ATTEST:

Kyle DeHaven, Clerk to the Board


Bennie Heath, Chairman

This document replaces the document in the Compliance Package with a similar name adopted 11-4-24 to comply with DWI requirements.