



CDBG - MIT Citizen Participation Plan

CITY OF HOUSTON

**HOUSING AND COMMUNITY
DEVELOPMENT DEPARTMENT**

2100 Travis Street | 9th Floor | Houston TX 77002

Citizen Participation Plan for Houston's CDBG-MIT (CPP-MIT)

Summary of Changes – 6/10/2026

- Added a definition (footnote) to define activity and project
- Updated address and locations of the DRMIT action plans and amendments
- Updated the minor amendment section to a non-substantial amendment
- Updated the definition for non-substantial amendment
- Added a transparency notice section
- Added a table to explain the difference between a substantial amendment, non-substantial amendment, and transparency notice

1. Introduction

The purpose of the Citizen Participation Plan for Houston's Community Development Block Grant Mitigation (CDBG-MIT) is to establish a means by which residents of the City of Houston (City), public agencies, and other interested parties can actively participate in the implementation and assessment of documents related to CDBG-MIT activities. The City developed the CPP-MIT to meet the requirements of the CDBG-MIT funds and reflects the alternative requirements as specified by 84 FR 45838.

The CPP – MIT is a separate, distinct, and tailored plan based upon and consistent with the City's *Citizen Participation Plan*, which describes public participation related to the consolidated planning process and entitlement grants. The City encourages citizen participation that emphasizes the involvement of low- and moderate-income residents, minority populations, persons with limited English proficiency, and persons with disabilities.

2. Availability and Accessibility of Records

During the term of the CDBG-MIT grant, the City will provide citizens and other interested parties with reasonable and timely access to information and records relating to the Action Plan and to the grantee's use of grant funds. This Action Plan and associated amendments and performance reports will be made available on HCDD's website, and upon request, from the HCDD. In addition, these documents are available in a form accessible to persons with disabilities and those with limited English proficiency, upon request.

a. Citizen Advisory Group

The City of Houston will form one citizen advisory committee that will meet at least twice annually to provide increased transparency in the implementation of the CDBG-MIT funds, to solicit and respond to public comment and input regarding Houston's mitigation activities, and to serve as an ongoing public forum to inform Houston's CDBG-MIT projects and programs continuously.

b. Public Website

HCDD maintains a public website which provides information for how CDBG-MIT funds are used, managed, and administered. It will include links to all CDBG-MIT Action Plans and amendments, performance reports, CDBG-MIT citizen participation requirements, and activity/program information for activities described in the CDBG-MIT Action Plan. It will also include details of all contracts and ongoing procurement policies. The following items will be available on the Mitigation website (<https://houstontx.gov/hcdrecovery/dr-mit/>):

- Action Plan and amendments
- Quarterly Performance Reports (QPRs)
- Procurement policies and procedures

- All executed contracts that will use CDBG-MIT funds
- The status of services or goods currently being procured

3. Amendments

Occasionally, it may be necessary for the City to update the Action Plan. Amendments to the Action Plan are divided into two categories: substantial amendments and non-substantial amendments. As amendments occur, both types are numbered sequentially and posted on the City's CDBG-MIT website at <https://houstontx.gov/housing/mitigation.html>. Copies of amendments are available upon request to: hcdd@houstontx.gov or 832.394.6200.

The most current version of the entire Action Plan will be accessible for viewing as a single document. Each amendment will have highlighted changes, and the beginning of amendments will include:

- Section identifying exactly what content is added, deleted, or changed
- Revised budget allocation table that reflects all funds and illustrates where funds are coming from and moving to, as amended and applicable
- Description of how amendment is consistent with the mitigation needs assessment

a. Substantial Amendment

The following criteria are used to determine what constitutes a Substantial Amendment to the City's approved Action Plan:

- The addition of a CDBG-MIT Covered Project (according to FR 45838, a Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds)
- A change in program benefit or eligibility criteria
- The addition or deletion of an activity¹
- A new allocation or reallocation of more than 25 percent of an activity in the Program Budget

Substantial Amendments are subject to a citizen participation process and require formal action by the City Council and submission to HUD. The City announces Substantial Amendments to the public through a public notice published on our website, and the City may utilize additional methods for general circulation, for a period of 30 days, to provide opportunity for public review and comment regarding proposed Substantial Amendments. Notices will be available in English and may also be available in Spanish and other languages, as feasible. The City will consider all written and/or oral comments or views concerning proposed Substantial Amendments that are received during the comment period. A summary of these comments and views, including comments or views not accepted, and the reason why, along with HCDD's response to each, shall be submitted with each Substantial Amendment.

b. Non-substantial Amendment

The City classifies any change to the Action Plan that does not meet the criteria for a "substantial amendment" as a non-substantial amendment. Because the public is already informed of new project activities through separate public notices, adding a project² to an activity does not necessitate an amendment to the Action Plan. The City does not require a public comment period for these non-substantial changes.

c. Transparency Notice

¹ Activity: The first level of HUD categories of activities at 24 CFR 570.201-206 and listed on the Action Plan for Disaster Recovery 2025 budget page that accompanies the SF-424 Form, i.e. public services, public facilities, and improvements, etc.

² Project: Allocation of funds under an activity to a subrecipient, developer, institutions, businesses, other city departments, and/or infrastructure sites.

The City classifies any allocation of funding to a project (a subrecipient, developer, institutions, businesses, other city departments, and/or infrastructure sites) before council approval as requiring a “transparency notice”. As the City identifies projects under this grant, it will post this notice on our website for seven (7) days to provide an opportunity for public review and comment.

d. Substantial Amendment, Non-substantial Amendment, vs Transparency Notice Chart

To make it easier to determine the difference between a substantial amendment, non-substantial amendment, or transparency notice the City has created the chart below:

Substantial Amendment	Non-substantial Amendment	Transparency Notice
- The addition of a CDBG MIT Covered Project (according to FR 45838, a Covered Project is defined as an infrastructure project having a total project cost of \$100 million or more, with at least \$50 million of CDBG funds) - A change in program benefit or eligibility criteria - The addition or deletion of an activity - A new allocation or reallocation of more than or equal to 25% of an activity on the budget page	- Any change to an approved action plan or amendment - A new allocation or reallocation of less than 25% of an activity on the budget page - Edits or formatting changes to an approved action plan or amendment	Any allocation of funding to a project (a subrecipient, developer, institutions, businesses, other city departments, and/or infrastructure sites) before Council approval

4. Application Status and Transparency

As applicable, the City of Houston will provide multiple methods of communication to provide applicants with timely information to determine the status of their application for assistance, including by phone, by mail, and in person. When competitively awarding CDBG-MIT funds, the City of Houston will publish on the website the eligibility requirements for the funding, all criteria to be used in the selection of applications for funding, including the relative importance of each criterion, and the time frame for consideration of applications. HCDD will maintain documentation to demonstrate that each funded and unfunded application was reviewed and acted upon in accordance with the published eligibility requirements and funding criteria. Currently, no person, household, or business will receive direct benefits through the Local Flood Mitigation Program.

5. Citizen Complaints

Written complaints from the public related to this Action Plan (or its amendments), QPRs, or the City’s activities or programs funded with CDBG-MIT, will receive careful consideration and will be answered in writing, or other effective method of communication, within 15 business days, where practicable.

Written complaints should be sent to:

Attn: Compliance and Grant Administration
City of Houston Housing and Community Development Department
2100 Travis Street, Suite 900
Houston, TX 77002

Email: HCDDComplaintsAppeals@houstontx.gov

Phone: 832.394.6200

Citizen Participation Plan for Disaster Recovery MIT

Complaints regarding fraud, waste, or abuse of government funds will be forwarded to the City of Houston Office of Inspector General or the Department of Housing and Urban Development Office of Inspector General (Phone: 1-800-347-3735 or Email: hotline@hudoig.gov).