

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

### 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 on-going public forum to continuously inform Houston's CDBG-MIT projects and programs.

#### 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/housing/mitigation.html>):

- 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 Nonsubstantial Amendments. As amendments occur, both types of amendments are numbered sequentially and posted on the City's CDBG-MIT website, <https://houstontx.gov/housing/mitigation.html>.

Copies of amendments are available upon request to: [hcss@houstontx.gov](mailto:hcss@houstontx.gov) or 832.394.6200.

The most current version of 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 activity
- 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 in one or more newspapers of general circulation, for a period of 30 days, in order 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. Nonsubstantial Amendment

The City is not required to undertake public comment for an Action Plan amendment that is not considered a Substantial Amendment. The City will notify HUD of a Nonsubstantial Amendment at least 5 business days before the amendment becomes effective.

### 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 application 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.

City of Houston

Written complaints should be sent to:

Attn: Planning and Grants Management  
City of Houston Housing and Community Development Department  
2100 Travis Street, Suite 900  
Houston, TX 77002

Email: [HCDDComplaintsAppeals@houstontx.gov](mailto:HCDDComplaintsAppeals@houstontx.gov)

Phone: 832.394.6200

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](mailto:hotline@hudoig.gov)).