

Citizen Participation: Requirements and Best Practices for CDBG-MIT



Presenters

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- From Enterprise Community Partners:
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Citizen Participation Webinar Agenda

- Introduce the Presenters
- Define Citizen Participation
- Describe CDBG-MIT Citizen Participation Requirements
 - How they differ from CDBG-DR Requirements
- Present Citizen Participation Good Practices
 - Citizen Participation Plan
 - Citizen Advisory Committee
 - Resourcing Citizen Participation
- Citizen Participation Case Study
- Share Additional Resources
- Q&A



Defining Citizen Participation

What is it?

Any process that involves the public in:

- Idea generation
- Problem solving
- Decision making
- Collaborative action



Defining Citizen Participation

Why does it matter?

- Improves understanding
- Makes better decisions and solutions
- Strengthens acceptance and support
- Fosters more accountable decision-makers
- Increases social capital



Overview of CDBG-MIT Citizen Participation Requirements

- Develop or amend citizen participant plan for disaster recovery to reflect the CDBG-MIT requirements.
- Consult with stakeholders.
- Publish Action Plan for mitigation on required public website for no less than 45 days to solicit public comment.
 - Substantial amendments for no less than 30 days
- Convene the required amount of public hearings on the proposed Action Plan.
- Respond to public comments.
- Update public website regularly, including with additional required documents.
- Form one or more Citizen Advisory Committees.
- Respond to citizen complaints.



Citizen Participation Plan

*“Each grantee must **amend its existing citizen participation plan or adopt** a new plan that incorporates the CDBG-MIT specific citizen participation requirements outlined in this section.”*



Stakeholder Consultation

Grantees must consult with

- States
- Indian tribes
- Local governments, including any CDBG Entitlement grantees
- Federal partnership
- Nongovernmental organizations
- Private sector
- Other stakeholders and affected parties in the surrounding geographic area
- Any separate agency of the jurisdiction that is responsible for development of the FEMA HMP for the grantee's jurisdiction, including coordinating with the State Hazard Mitigation Officer



Public Website

- Disaster mitigation must be navigable from homepage
- Update website at least monthly
- Provide information accounting for how CDBG-MIT funds are used, managed and administered
- Required items available on website:
 - Action Plan (including all amendments)
 - Quarterly Progress Reports (QPRs)
 - Procurement policies and procedures
 - All executed contracts paid with CDBG-MIT funds
 - State or goods currently being procured



Public Hearings

Number of **required public hearings** based CDBG-MIT Allocations:

Under \$500 Million

- At least 2 public hearings in different locations within MID Areas
- At least 1 prior to publication of Action Plan for public comment

\$500 Million or More

- At least 3 public hearings in different locations within MID Areas
- At least 1 prior to publication of Action Plan for public comment

\$1 Billion or More

- At least 4 public hearings in different locations within the MID Areas
- At least 2 prior to publication of Action Plan for public comment



Public Hearings

Civil Rights Requirements

- Must be held in facilities that are physically accessible to persons with disabilities
- If physical accessibility is not achievable, prioritize alternative methods of product or information delivery (e.g. recording and posting hearings online, web simulcast, videoconference, teleconference, etc.)
- Effective communication requirements for persons with disabilities and meaningful access for persons with Limited English Proficiency.



Public Comment

- Publish Action Plan for Mitigation on grantee's required public website for no less than **45 calendar days** for public comment.
- Substantial Amendments require **30-day public comment** period.
- Consider all comments, received orally or in writing.
- Provide summary of comments to HUD with Action Plan or Substantial Amendment.



Citizen Advisory Committee

New requirement

- Must be formed following approval of Action Plan, but also *can* be formed as part of Action Plan preparation process
- Form one or more citizen advisory committees to:
 - Meet in an open forum, at least twice per year
 - Provide transparency
 - Serve as an ongoing public forum to inform CDBG-MIT projects and programs



Citizen Complaints

- Provide written response to every citizen complaint within **15 working days** of receipt of complaint.
- Forward complaints on fraud, waste, and abuse of governments funds to HUD OIG Fraud Hotline
 - 1-800-347-3735
 - hotline@hudoig.gov



Citizen Participation Differences Between CDBG-DR and MIT

Requirement	CDBG-DR	CDBG-MIT
Stakeholder Consultation	States, Indian tribes Local governments (including CDBG Entitlement grantees), Federal partnership, Nongovernmental orgs, Private sector, Other stakeholders and affected parties	All DR requirements plus consult agency that is responsible for development of the FEMA HMP, including the State Hazard Mitigation Officer
Public Hearings	None	< \$500 million: 2 public hearings ≥ \$500 million: 3 public hearings ≥ \$1 billion: 4 public hearings
Public Comment	15-30 days for Action Plan 15-30 days for Substantial Amendment *as amended by notices	45 days for Action Plan 30 days for Substantial Amendment
Citizen Advisory Committee	None	At least one after Action Plan approved (can be more and before)



Good Practices on Citizen Participation



Citizen Participation Plan: Requirement

“Each grantee must amend its existing citizen participation plan or adopt a new plan that incorporates the CDBG-MIT specific citizen participation requirements outlined in this section.”



Citizen Participation Plan: Key Steps

- 1) Gain Internal Commitment
- 2) Learn from the Public
- 3) Select the Level of Participation
- 4) Define the Decision Process and Identify Citizen Participation Objectives
- 5) Design the Citizen Participation Plan

--Adapted from IAP2's "Five Steps for Public Participation Planning"



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Citizen Participation Plan: Outline

- Project Background and Overview
- Decision(s): Scope, timeline, process/steps, requirements and constraints
- Citizen Participation Levels, Objectives and Desired Outcomes
- Stakeholder Analysis Summary: Target stakeholders, issues they care most about/will be most impacted by, history of engagement, barriers and assets to engagement
- Outreach and Engagement Methods: By point in decision process, by participation objective, by stakeholder group
- Approach to synthesizing input and reporting back findings, decisions, and progress
- Schedule, budget, staffing, resources, operational details
- Evaluation Plan



Citizen Advisory Committee

New requirement

- Must be formed following approval of Action Plan, but also *can* be formed as part of Action Plan preparation process
- Form one or more citizen advisory committees to:
 - Meet in an open forum, at least twice per year
 - Provide transparency
 - Serve as an ongoing public forum to inform CDBG-MIT projects and programs



Citizen Advisory Committee—Why

CDBG-MIT Objectives

“Provide **transparency** in the implementation of CDBG-MIT funds...

To **solicit and respond to public comment** and input regarding the grantee’s mitigation activities and...

To serve as an on-going public forum to **continuously inform the grantee’s** CDBG-MIT projects and programs.”



Citizen Advisory Committee—Why

Beyond the requirement, **why** use an Advisory Committee?

- Build ongoing partnership with the community
- Inform decision-makers of key community perspectives
- Develop/improve relationships with stakeholders
- Understand a range of perspectives



Citizen Advisory Committee—When

When can they be most useful?

- Many decisions require some level of public involvement (and when the public might have engagement fatigue)
- Project and decisions may be controversial or result in criticism, regardless of the decision
- Regular input on complex topics is needed over time



Citizen Advisory Committee—Key Components

Mission

Members

Roles and Responsibilities

Operations

Outputs



Citizen Advisory Committee—Key Components

Mission

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Roles and Responsibility

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Outputs



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Resourcing Citizen Participation

Before CDBG-MIT Award

General citizen participation for mitigation planning are eligible Admin Costs and can be reimbursed.

During CDBG-MIT Award

Still Admin Costs if general citizen participation. If citizen participation is in support of specific plan (not Action Plan), then use Planning Costs.

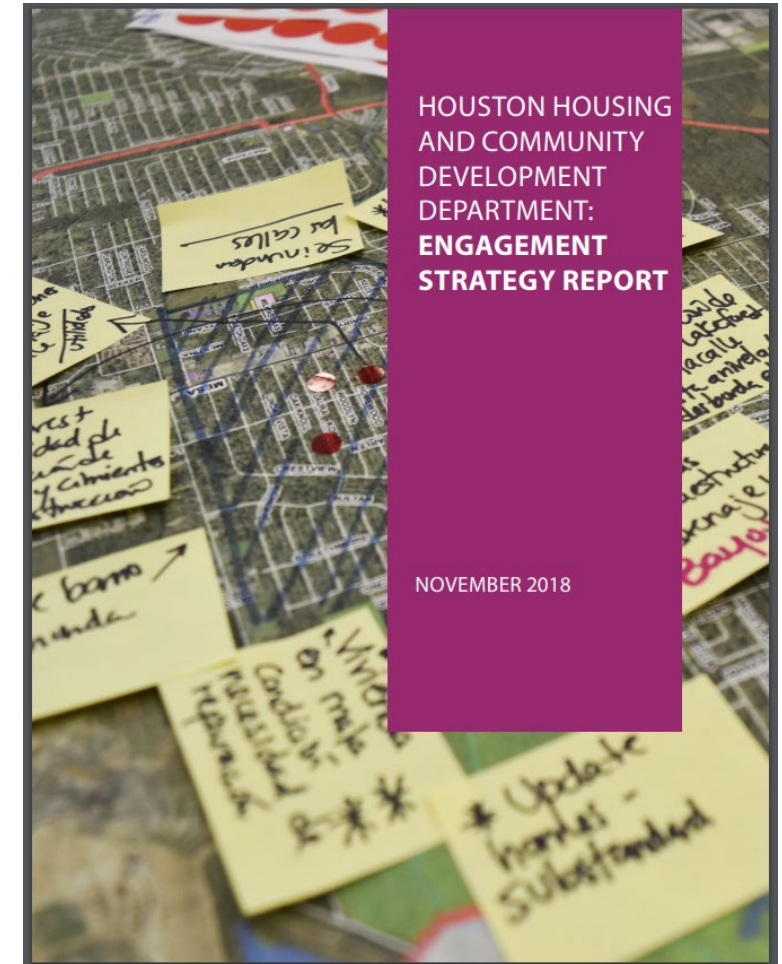


Case Study: CDBG-DR Citizen Participation in Houston



Case Study: Houston CDBG-DR

“In response to the destruction that Hurricane Harvey caused, Congress allocated \$5.024 billion to the State of Texas in September 2017...the City of Houston would have local control over \$1.15 billion of these funds. [T]he City of Houston had a short window of time in which to develop an Action Plan for its portion of the allocated funds. In an effort to **increase transparency** in the process and **support community efforts** that promote the "right to stay, right to choose" framework promoted by housing advocates locally, the City of Houston's Housing and Community Development Department (HCDD) initiated their **largest community engagement effort to date**. Partners, organizations and consulting teams...were engaged to **increase the success and reach** of the engagement process.”



Case Study: Houston CDBG-DR

“To create a local housing recovery Action Plan that was representative of the needs and priorities of Houston residents, HCDD engaged more than 800 Houstonians through **public meetings**, 746 through an **online survey**, and more than 3,000 people through a **tele-townhall** co-hosted with AARP.”

ENGAGEMENT STRATEGIES SOUGHT TO:

- LEARN HOW RESIDENTS ARE RECOVERING FROM HARVEY
- UNDERSTAND RECOVERY SPENDING PRIORITIES
- EDUCATE AFFECTED RESIDENTS ON RECOVERY OPPORTUNITIES



Case Study: Houston CDBG-DR

PARTNERS & ORGANIZATION OUTREACH

To bolster their community engagement and outreach capacity, HCDD reached out to local organizations including advocacy organizations, civic clubs, Super Neighborhoods, and City Council Members. These partnerships would play a critical role in expanding their reach and ensuring community participation. In May and June 2018, HCDD worked with partners to convene 17 public meetings, 8 focus groups, and give 7 presentations.

1. COMMUNITY ORGANIZATIONS

Texas Organizing Project (TOP)
Local Initiatives Support Corporation (LISC)
Familias Immigrantes y Estudiantes en la Lucha (FIEL)
American Association of Retired Persons (AARP)
Houston Housing Coalition

2. CITY COUNCIL MEMBERS

Council Member Stardig - District A
Council Member Davis - District B
Council Member Boykins - District D
Council Member Martin - District E
Council Member Travis - District G
Council Member Gallegos - District I
Council Member Castex-Tatum - District K

3. SUPER NEIGHBORHOOD COUNCILS

Super Neighborhood 52 - Kashmere Gardens
Super Neighborhood 57 - Pleasantville
Super Neighborhood 59 - Clinton Park

4. CIVIC CLUBS

East Houston Civic Association
Emancipation Economic Development Council



Case Study: Houston CDBG-DR

WHAT WORKED

BIG REACH

- The six-week community engagement effort reached about 4,500 Houston residents through public meetings, focus groups, an online survey, and two tele-town halls. This was HCDD's largest community engagement effort to date.
- Using different strategies like the tele-town halls and the online survey increased participation.

CITY LEADERSHIP

- Strong commitments from the Mayor and Housing Director emphasized the importance of hearing from the community in disaster recovery
- Senior participation from HCDD at all events—especially the Director—reinforced this commitment

BUILDING TRUST

- Consulting with community groups in the design of the process helped to begin building trust in the department
- HCDD adopted many of the recommendations of focus groups participants, including reporting back to the public about what the department heard through engagement

PARTNERSHIP APPROACH

- Partnering with community organizations made it possible to reach so many Houstonians
- Consulting with experts from the community to design the process increased buy-in and made the events more appropriate for the post-disaster context
- Building a team of local organizations and HCDD's master contractor created enough capacity to execute an aggressive event schedule in just six weeks

EDUCATING THE PUBLIC

- The engagement was an opportunity to gather feedback and also to educate people about what's coming in disaster recovery

FLEXIBLE FORMAT

- Partners appreciated having a core format that could be adapted based on the needs of the specific event

CHALLENGES

IDENTIFYING AND COORDINATING MANY STAKEHOLDERS

- The partnership approach required balancing many different interests, timelines, priorities, and competencies while managing the success of the overall initiative
- Establishing partnerships largely relied on HCDD staff's existing relationships and may have missed some groups or areas where these relationships were missing
- A stakeholder analysis would have helped to be more comprehensive in reaching out to potential partners

CAPACITY

- Many facilitators were not experienced and needed training
- It took several meetings to establish a core group of trainers from [bc], CDRC, and APTIM to meet intensive schedule demands

INFORMATION-GATHERING

- It took several meetings to get the format for information-gathering right, and to train facilitators to record feedback in similar formats

NEED FOR SPEED

- The deadline for submitting the local action plan to City Council limited the time available for comprehensive planning and training
- There was a tension between the desire to get started more quickly and a desire for clarity about what the whole process would look like, especially when trust-building was at an early stage

EXPLAINING COMPLEX CONCEPTS

- Federal funding for disaster recovery comes with many restrictions that were difficult to explain in plain language
- More testing of presentations and handouts in advance would have been helpful

SPREADING THE WORD

- HCDD relied mostly on Facebook, Twitter, and its homepage to notify residents about the events. Partners also spread the word and flyers were distributed to city council.
- More diverse strategies for sharing information about the events could have increased reach.



Case Study: Houston CDBG-DR

RECOMMENDATIONS FOR FUTURE COMMUNITY ENGAGEMENT

COMMUNICATION

- **View the media as a partner:** Work with news outlets to inform residents about upcoming opportunities for engagement.
- **Expand online engagement:** Information sharing shouldn't be limited to websites and social media. The department should consider ways to expand multi-language online communication and modernize the user experience on its website.
- **Inform the community on a regular basis:** Recovery is difficult to understand. The department should seek to execute a transparent recovery with regularly updated statistics and other recovery information shared widely with the community.
- **Create an HCDD distribution list for organizations the department engages:** Streamline communication with partners such as community organizations, service providers, community development corporations (CDCs), civic clubs, super neighborhood councils, and housing advocates. Provide regular updates to this group so they can share information in the community.

ENGAGEMENT

- **Conduct a stakeholder analysis to properly scope engagement:** The first round of engagement may have missed key constituencies, such as those who don't speak English or those who have accessibility barriers. A stakeholder analysis can deepen the department's understanding of who it should engage.
- **Create ongoing opportunities for engagement during Harvey recovery:** High-level commitments from Mayor Turner and Director McCasland were a good start in demonstrating that the City wants to hear from residents about recovery. Residents want continued opportunities to learn about recovery and provide input about recovery programs. Build engagement strategies into the larger recovery effort and communicate about them clearly.

DATA

- **Consider how data will be collected, stored, and analyzed as part of the design process:** Ensure that data solicited from communities is consistent and meaningful to the decisions the department is facing.
- **Document strategies and develop partnerships so they can be leveraged in future disasters:** View community engagement as an ongoing process, with heightened needs around major disasters. Prepare for the future by documenting processes as they are developed and regularly communicating with partners so they are ready to work together.

FACILITATION

- **Ensure facilitators are well trained:** Develop a pool of facilitators including HCDD staff, partner organizations, and contractors and conduct trainings in advance of major engagements.



CDBG-MIT Webinar Series



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Past Webinars:

- CDBG-MIT Federal Register Notice (September 3, 2019)
<https://www.hudexchange.info/trainings/courses/cdbg-mit-federal-register-notice-webinar/>
- Conducting a Mitigation Needs Assessment for CDBG-MIT (October 10, 2019)
<https://www.hudexchange.info/trainings/courses/conducting-a-mitigation-needs-assessment-for-cdbg-mit-webinar/>



CDBG-MIT Webinar Series

Upcoming Webinars:

- Thursday, November 7 at 3:00 PM: Buyouts for CDBG-DR and CDBG-MIT
- Thursday, November 14 at 3:00 PM: FEMA BCA Toolkit Demo w/FEMA
- Wednesday, November 20 at 3:00 PM: Best Practices for Transformative Mitigation Projects



Additional Resources



Local Mitigation Planning Handbook. March 2013

The Local Mitigation Planning Handbook is a tool developed by the Federal Emergency Management Agency for local governments to use in developing or updating a local hazard mitigation plan.

https://www.fema.gov/media-library-data/20130726-1910-25045-9160/fema_local_mitigation_handbook.pdf

Community Resilience

What community resilience is, why it matters to disaster preparedness, and strategies to foster it.

<http://phe.gov/preparedness/planning/abc/pages/community-resilience.aspx>

Community Resilience Planning Resources on Community Engagement

Resources focused on community engagement in community resilience planning.

[https://www.hudexchange.info/programs/community-resilience/community-resilience-planning-resources/ - community-engagement](https://www.hudexchange.info/programs/community-resilience/community-resilience-planning-resources/-community-engagement)



Houston Housing and Community Development Department: Engagement Strategy Report. Nov. 2018

Report capturing approach, findings, and lessons on community engagement in CDBG-DR.

[https://houstontx.gov/housing/plans-reports/Community Engagement Report-090519.pdf](https://houstontx.gov/housing/plans-reports/Community_Engagement_Report-090519.pdf)

International Association of Public Participation

IAP2 is an international association of members who seek to promote and improve the practice of public participation / public engagement. They provide resources on their website and deliver in-person trainings.

<https://www.iap2.org/>



Questions?



Contact Information

- Questions and information requests can be sent to: CDBGMIT@hud.gov

