



TEXAS DEPARTMENT OF AGRICULTURE  
COMMISSIONER SID MILLER

August 26, 2025

Re: Texas Community Development Block Grant (TxCDBG) program September 2025 Revisions to the Texas CDBG Project Implementation Manual

Dear Stakeholders:

The Texas Department of Agriculture (TDA) has adopted the 2025 Texas CDBG Project Implementation Manual (2025 TxCDBG Manual), effective date September 1, 2025. These new rules and requirements will apply to all current grant agreements.

The changes listed below and other relevant program information will be included in the 2025 TxCDBG Implementation Workshops, beginning in August 2025. Please see the TxCDBG Training page of the TDA website for Workshop details.

Thank you for your efforts to assist rural Texas communities.

Sincerely,

Suzanne Barnard

Director, TxCDBG Programs

## Highlights of the draft 2025 TxCDBG Project Implementation Manual

Manual Chapter	Description of changes
Introduction	<ul style="list-style-type: none"> <li>No Significant changes</li> </ul>
Chapter 1 Administration and Reporting	<ul style="list-style-type: none"> <li>Clarification of existing consequences for failure to meet milestones.</li> <li>Clarification that Group B documents requires 50% of the cumulative Construction budget to be obligated.</li> <li>Clarification that neither progress threshold will prevent a SUN fund applicant from applying.</li> <li>Clarification of electronic signature acceptance requirements.</li> <li>Clarification of Conflict of interest language.</li> <li>Minor clarifying edits.</li> </ul>
Chapter 2 Financial Management	<ul style="list-style-type: none"> <li>Addition of 10% retainage of Administration funds OR minimum of \$3,000 for potential penalties.</li> <li>Additional items added to list of costs eligible for matching funds only.</li> </ul>
Chapter 3 Environmental Review	<ul style="list-style-type: none"> <li>Inclusion of new language regarding choice limiting actions taken prior to receipt of the Clarification on Choice Limiting-Choices as it relates to projects to be completed via Force Account.</li> <li>Update to floodway policy.</li> </ul>
Chapter 4 Grant Agreement Special Conditions	<ul style="list-style-type: none"> <li>Clarification of requirements for BABA compliance documentation, including the addition of the BABA Contractor Certification (Form A402)</li> </ul>
Chapter 5 Procurement Procedures	<ul style="list-style-type: none"> <li>Clarification that grant recipients cannot advantage RFP respondents that are designated as a Historically Underutilized Business, D.E.I. policy or similar.</li> <li>Clarification that RFPs cannot be based on a percentage of the CDBG award amount and must be an estimated fixed cost.</li> <li>Reinstate requirement to submit financial interest disclosure within 30 days of execution.</li> <li>Statement of expectations for documentation of contract awards.</li> <li>Update to Small Purchase Procurement threshold.</li> <li>Clarification of expectations for lump sum bid items.</li> </ul>
Chapter 6 Acquisition of Real Property	<ul style="list-style-type: none"> <li>Clarification of detail required to be included in the Acquisition Plan.</li> </ul>
Chapter 7 Davis Bacon Labor Standards	<ul style="list-style-type: none"> <li>Specific instructions for grant recipients that must return funds to TDA.</li> <li>Update to payroll signature requirements.</li> </ul>
Chapter 8 Force Account	<ul style="list-style-type: none"> <li>No Significant changes</li> </ul>
Chapter 10 Civil Rights	<ul style="list-style-type: none"> <li>Clarification that protected classes remain codified.</li> </ul>
Chapter 11 Grant Agreement Amendments	<ul style="list-style-type: none"> <li>New option for public notice for amendments requiring public participation.</li> <li>Clarification that extensions that cannot be approved within sixty (60) days of the grant agreement end date as a result of the grant recipient's inability or refusal to address TDA's concerns will not be approved.</li> <li>Change from holding Grant Recipient responsible for the late submission of amendments to the Grant Administrator.</li> </ul>
Chapter 12 Grant Agreement Closeout	<ul style="list-style-type: none"> <li>No Significant changes</li> </ul>
Chapter 13 Monitoring Review	<ul style="list-style-type: none"> <li>No Significant changes</li> </ul>
Chapter 14 Audit Requirements	<ul style="list-style-type: none"> <li>Update to reflect the new Single Audit threshold.</li> </ul>
Section B Planning	<ul style="list-style-type: none"> <li>No Significant changes</li> </ul>

Section C Housing  
Rehabilitation

- No Significant changes