

Guidance for Improving the Quality of CDBG Accomplishment Data in IDIS

HUD uses IDIS data on a regular and ad hoc basis to report to entities that evaluate and fund the CDBG Program, including Congress, the Office of Management and Budget, the General Accounting Office, the Office of the Inspector General, as well as other stakeholders. Missing, inaccurate, and incorrect data result in reports that present a misleading—and sometimes negative—picture of program accomplishments. Incorrect IDIS data reflect unfavorably on the CDBG program because HUD cannot accurately report on program performance accomplishments.

While many data errors can be prevented by system edits, others cannot. As an example, consider CDBG matrix codes. IDIS can ensure that a valid code is entered (e.g., an entry of 55X is rejected), but cannot require users to input the correct code (e.g., 03D instead of 03 for the construction of a youth center).

This guidance addresses the types of errors that edits cannot prevent and identifies the steps that should be taken to correct them – or prevent them in the first place.

Problem	Solution
<p>Timely reporting of accomplishment data.</p> <p>When accomplishment data are not entered on a regular basis, the CDBG program does not have up-to-date information on what has been achieved. This results in undercounting the program's accomplishments. This is due, in part, to the infrequent entry of data in IDIS by some grantees.</p>	<p>Enter accomplishment data as frequently as possible.</p> <p>Annual reporting is required and HUD has encouraged grantees to enter accomplishments on a quarterly basis, but the value of more frequently reporting of accomplishments cannot be overemphasized. The only exception to quarterly/annual reporting is public facilities, which should not be reported until the facility is complete.</p>
<p>Unresolved errors on Data Cleanup worksheets</p>	<p>Ensure that all errors on the CDBG Data Cleanup spreadsheets are corrected.</p> <p>The spreadsheets identify activities that have (1) missing accomplishment data, (2) incorrect matrix code/national objective combinations, (3) inaccurate or inconsistent accomplishment data, and (4) missing organization names. The URL for the spreadsheets is: http://www.hud.gov/offices/cpd/communitydevelopment/cleanup/index.cfm</p>
<p>Incorrect matrix codes</p> <p>When CDBG aggregates IDIS data to the national level, it is generally by matrix code. Therefore, grantees across the country must be consistent in uniformly applying matrix codes to activities.</p>	<p>Grantees should review all matrix codes to ensure they are accurate. However, the most common problems when selecting the matrix code for an activity are:</p> <ul style="list-style-type: none">Codes 03 and 05: Avoid these “general” public facility and public service matrix codes. Use the most specific 03* or 05* code that accurately describes how CDBG funds are being used.Code 05U, Housing Counseling: Use this new matrix code for housing counseling provided as an independent public service (i.e., not as part of another eligible housing activity).Code 05R, Homeownership Assistance (not direct): Use this matrix code when downpayment assistance is provided as a public service. If housing counseling is provided to those

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	<p>applying for downpayment assistance, the counseling is considered part of the homeownership program. Note that under the low/mod national objective, assistance under this category must meet the housing national objective. Therefore, unless the assistance is provided by a CBDO or 105(a)(15) in a NRSA/CRSA, it is subject to the public service cap and only low/mod income households may be assisted. But if provided by a CBDO in a NRSA, housing units for which CDBG funds are obligated in a program year may be aggregated and treated as a single structure for purposes of meeting the housing national objective (i.e., only 51% must be occupied by low/mod households).</p> <ul style="list-style-type: none"> • Code 13, Direct Homeownership Assistance: Use this matrix code when low- and moderate-income households are provided homeownership assistance as authorized under 105(a)(24). Types of homeownership assistance eligible under this category: subsidize interest rates and mortgage principal; finance acquisition of housing occupied by low/mod households; acquire mortgage guarantees; provide up to 50% of downpayment; and pay reasonable closing costs. If housing counseling is provided to households receiving homeownership assistance, the counseling is considered part of the homeownership program. • Code 14H, Rehab Administration: This code is to be used for the costs of running a rehab program — i.e., activity delivery costs associated with actual rehabilitation activities. It is <i>not</i> to be used for costs unrelated to running a rehab program, such as tenant/landlord counseling, planning and development of research studies on foreclosures, etc. (Note: if costs under this matrix code are for a housing rehab program, the correct low/mod national objective is LMH, <i>not</i> LMA.)
Missing or inaccurate leveraged funds data	<p>Ensure that all leveraged funds are entered on the <i>correct</i> line on the CDBG02, Funding Sources screen.</p> <p>The CDBG Funds field is protected from input because it is populated by the system once CDBG funds are committed through the Activity Funding option. Do not enter the amount of CDBG funds in the Section 108 Loan Guarantee field on CDBG02. Grantees should delete CDBG amounts that have been entered in the Section 108 field <i>unless</i> the amount entered does represent Section 108 loan proceeds received for the activity.</p>
<p>Inaccurate beneficiary income data on the CDBG13 screen</p> <p>Some grantees, solely to minimize data entry, report the income level of all the beneficiaries of an activity as “moderate.” This practice conveys the impression in reports that CDBG grantees are ignoring the program’s legislative mandate to assist extremely low- and low-income</p>	<p>Report income level data in the appropriate categories (extremely low, low, moderate, and non-low/moderate) on the CDBG13 screen.</p>

Problem	Solution																
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<p>Inaccurate counts of jobs created and retained</p> <p>Analysis of the jobs data indicates that some grantees are reporting the same jobs multiple times.</p>	<p>Follow these guidelines to avoid overcounting/duplication of jobs:</p> <ul style="list-style-type: none"> In a given program year, do not report the same jobs under more than one activity. This type of double-counting often occurs when activity delivery costs are tracked in a separate activity. When this is the case, the job creation and retention screens (CDBG11, CDBG26, and CDBG27) should not be completed for the activity tracking the activity delivery costs. Grantees should instead associate this activity to the activity where the jobs are reported by entering "Y" in the Accomplishments for this Activity Reported at Another Activity field on the MA04 screen. Do not report the same jobs in multiple program years. Report only the number of jobs created/retained; do not report on the LMI population or the total population of a jurisdiction. 																
Missing or incomplete Performance Measurement (PM) data	<p>Ensure that PM data is reported for all activities open on or after October 1, 2006. In addition to completing the PM screens, be sure to fill in the applicable special attributes fields (e.g., Colonia, Brownfield Activity, Historic Preservation Area, Multi-Unit Housing, Strategy Area) on the CDBG06 screen.</p> <p>Review the PR83, PR84, and PR85 reports to determine the general level of Performance Measurement data that has been input.</p>																
Activity name and address/location data on the MA01 screen	<p>For reasons of privacy, grantees should not use the names of assisted persons/households as the Activity Name.</p> <p>Except for administrative activities, specify the activity's physical location (no P.O. boxes) in the Address/Location field. For administrative activities, enter the address of the organization administering the activity.</p>																
<p>Missing income level data for presumed benefit activities</p> <p>The CDBG13 screen (CDBG Beneficiary Income Levels) must be completed for presumed benefit activities, even though grantees are not required to obtain income information for those beneficiaries.</p>	<p>Report the number of persons benefiting under the following income categories unless there is information to support reporting them under a different income category:</p> <table> <tr> <td>Abused children</td><td>Extremely low income</td></tr> <tr> <td>Battered spouses</td><td>Low income</td></tr> <tr> <td>Severely disabled adults</td><td>Low income</td></tr> <tr> <td>Homeless persons</td><td>Extremely low income</td></tr> <tr> <td>Illiterate adults</td><td>Low income</td></tr> <tr> <td>Persons with AIDS</td><td>Low income</td></tr> <tr> <td>Migrant farm workers</td><td>Low income</td></tr> <tr> <td>Elderly</td><td>If assistance is to acquire, construct, convert, and/or rehabilitate a senior center or to pay for providing center-based senior services, report the</td></tr> </table>	Abused children	Extremely low income	Battered spouses	Low income	Severely disabled adults	Low income	Homeless persons	Extremely low income	Illiterate adults	Low income	Persons with AIDS	Low income	Migrant farm workers	Low income	Elderly	If assistance is to acquire, construct, convert, and/or rehabilitate a senior center or to pay for providing center-based senior services, report the
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	<p>beneficiaries as moderate income If assistance is for other services (not center-based), report the elderly beneficiaries as low income</p> <p>If an activity serves a combination of these groups, identify the number in each group and report those numbers under the appropriate income levels.</p>
<p>Economic Development (18*) activities reporting more than one business assisted</p> <p>The fact that the CDBG28 screen (Assistance to Businesses) allows grantees to report more than one business assisted does not mean that assistance to individual businesses under 570.203(b) [matrix code 18A] and 570.201(o) [matrix code 18C] may be aggregated in one activity. Unless the assisted activity is one identified at 570.208(a)(4)(vi) or 570.483(b)(4)(vi) for which job aggregation is allowed, each business assisted under matrix code 18A and 18C must be reported separately.</p>	<p>Set up a separate activity for each business receiving direct economic development assistance under matrix code 18A or 18C.</p>
<p>Missing accomplishment data for activity delivery cost activities with a matrix code of 18* or 14H</p>	<p>Ensure that accomplishments are reported for Economic Development (18*) and Rehab. Admin (14H) activity delivery cost activities, i.e., activities where CDBG funds are used to run loan/grant programs, if CDBG is not used to make the loans/grants. (If CDBG is also used to make the rehab or economic development loans/grants, use the field on the MA04 for the activity tracking the activity delivery costs to indicate that accomplishments are reported under another activity.)</p>