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RE: Docket No. FR-7002-N-05; Docket Number 2018-05302
Consolidated Plan & Annual Performance Report

The National Community Development Association (NCDA), a national non-profit organization comprised of over 400 local government agencies that administer the CDBG, HOME, ESG and HOPWA programs, is pleased to submit comments on the Consolidated Plan (Con Plan), Annual Action Plan and CAPER. We urge HUD to streamline its reporting systems, ensure integration of all HUD required reporting systems, ensure consistency among all systems, avoid duplication, and auto-populate reports to improve the quality and clarity of the reports and lessen the administrative burden for grantees. HUD collects an enormous amount of information via its reporting systems and we urge HUD to work with grantees to purge and streamline the data collected in IDIS to ensure its necessity and usefulness.

Ways to enhance the quality, utility, and clarity of the information to be collected. The following problems need to be fixed to enhance the quality, utility and clarity of the information to be collected through the Con Plan, Annual Action Plan and CAPER.

1. The current Con Plan is auto-populated with 2013 CHAS data even though the 2014 data has been available since May 2017. Also, the public housing data does not appear to have been updated since the previous Con Plan (5 years ago).

2. HUD encourages grantees to use CPD maps in preparing their Con Plan but CPD maps needs to be fixed. The widgets for generating reports do not work and have not worked for several years.

3. The Con plan should be updated to include prompts for the new broadband and resilience requirements.

4. For the cost burden table the composition of the "other" category is not explained and it happens to be the largest category for some grantees. This category should be broken down more.

5. For the disproportionately greater needs tables HUD could auto calculate which population categories have a disproportionate need as defined by HUD.

6. Inputting the CAPER into IDIS uses a standardized format and limits the character amounts per page causing it harder to follow for the public.

7. The CAPER in IDIS for the past two years has not produced accurate information on the prepopulated data from within IDIS. Last year, the PR03 report, which shows cumulative CDBG accomplishment information did not work.

8. In completing fiscal year end vouchers for CDBG, there is a previous year flag that forces the amount back to the correct fiscal year. This makes the IDIS total correct with fiscal year amounts for accrued costs. There is not the flag in IDIS for HOME or ESG, which makes the prepopulated totals incorrect.

9. Since the data for ESG is not in IDIS, there is always another process to learn for this piece that is complicated and more time consuming. Also, the race/ethnicity is different for IDIS and HMIS which further complicates the process.

10. All reporting requirements of CAPER and Annual Action Plans that are mandated by federal regulations should be part of the IDIS template. When HUD reviews our plans, they have asked the City to provide additional narratives because they are required by regulations, but the IDIS report template does not require or ask for the information. Each year the city has to "manually" remember to add those narratives to the reports.

11. 24 CFR 91.520. CAPER instructions appear to have been designed more to comply with a review checklist by HUD staff than to communicate to the public. Rewrite the CAPER instructions to help grantees produce a meaningful document that can be better understood by elected officials and the public. The CAPER should be more than a report on funds spent and persons served. It, and the Consolidated Plan, should be a seamless system to report on approved activities.

12. The purpose of the CAPER is to report on the previous program year, but grantees are receiving their entitlement funds late. The 2017 CAPER is reporting on activities completed with program year 2017 funds, but the funds weren't received until the program year was almost over. The CAPER does not accurately reflect the grantee's accomplishments for the 2017 plan year.

13. IDIS Online Report Template System: The 4000-character limit in text boxes does not provide enough space to provide a thorough narrative about the achievements and challenges for activities and programs. Only certain sections of the templates allow additional text boxes to be added. The formatting of these additional text boxes is difficult to read in both the IDIS template and in the Word document. Also, the PR02 report identifies activities by program year, but does not identify the year in which the activity was completed. The PR23 report identifies accomplishments by activity group and program year, but again does not specify the year in which the activity was completed. These reports do not fully provide the information needed to report on program year accomplishments.

14. Incorporate CPD GIS Maps within IDIS for: (1) area benefit data for activities; (2) Action Plan/Con Plan/CAPER accomplishment analysis; and (3) Mapping tool for reports (i.e., generate a map indicating all housing rehab activities completed within a fiscal year/con plan year).

15. IDIS should provide grantees with the option of allowing documents to be uploaded to activity entries (similar to the way the Action Plan and CAPER allow attachments). This would allow grantees to upload pictures and related documents directly to the activity entry in IDIS, which would make it easier to "tell the story" of each activity and would also allow IDIS to be used as an electronic filing system for each activity.

Ways to minimize the burden of the collection of information on those who are to respond; including through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses. We acknowledge that over the years HUD has made great strides in streamlining the data collection and reporting functions required for compliance with its entitlement grants. The upgrade and integration of the IDIS system has reduced the grantees' burden in completing these functions. The following problems must be addressed to minimize the burden of collection of information for grantees.

1. There is still substantial manual data entry and data culling needed to complete the required reports and ensure accuracy. We recommend an upgrade to the IDIS system that would automatically input required plans, activities, and goals. Then as data is entered as an activity progresses, the reporting functions could automatically track compliance and goal (in real time). Likewise, end of year reporting would be more

fully integrated and automated by the system. We also recommend that more training opportunities be offered that focus specifically on the use and mastery of the IDIS data system. Highly educated users of the system would reduce the time burden of compliance and reporting, as well as ensure over all accuracy and speed of reports.

2. Eliminate the outcome measures reporting requirement. This information doesn't appear to be used by HUD.

3. Since the data for ESG is not in IDIS, there is always another process to learn for this piece that is complicated and more time consuming. Also, the race/ethnicity is different for IDIS and HMIS which further complicates the process.

4. Ongoing system problems with downloading a Word version of the documents (examples – information entered in the online system does not appear in the Word document, tables don't format properly, etc.). Word versions of the documents are used to (1) provide to the public as part of citizen participation or (2) provide to staff members to review/edit the narratives of the reports. This requires of staff time to edit and proof the Word document to ensure that it is correct and complete.

5. Integrate the Assessment of Fair Housing with IDIS consolidated planning as an additional template in the IDIS e-Con Planning Suite, not another free-standing system.

6. Integrate the Section 3 reporting requirements into the IDIS e-Con Planning Suite, rather than a separate free-standing reporting system (e.g., Section 3 Performance Evaluation and Registry System).

7. HOPWA elements of the CAPER should be streamlined and auto populated from IDIS. Grantees should not have to separately submit HOPWA CAPER to SNAPS.

8. The Housing needs tables do not have the same AMI levels. Some just go to 80% of AMI, others go to 100% of AMI. HUD should standardize and show all income levels, including over 100% of AMI for all tables.

9. For the disproportionately greater need tables HUD could auto calculate which population categories have disproportionate need as defined by HUD or at least provide the category totals needed to do the calculations.

10. CAPER: Evaluate the existing IDIS reports – they do not seem to accurately track the information that is needed to complete the CAPER. Staff spends many hours trying to cross-check internal reports against the pre-populated fields in the CAPER to determine the correct number of units being tracked.

11. ConPlan/AAP: When creating a new AAP in IDIS, if you use the "copy" function, all of the previous year's projects are carried over. Each project in the new AAP then has to be manually and individually deleted and then added back in, in order to correlate to the new program year. This takes time and usually there is a system error because something isn't deleted properly.

12. Citizen Participation Noticing: For a CDBG community, legal notices in local newspapers are required as notice for public comment periods for floodplain management, environmental review, Request for Release of Funds, Action Plan draft availability, CAPER draft availability, public hearings, etc. For example, 24 CFR 91.105 (b)(2) requires publishing a summary of the Consolidated Plan (Con Plan) in a newspaper of general circulation and distribution of the Con Plan to libraries, government offices and other public places. Newspapers have become an almost obsolete method of providing the public with notice, yet they are the most expensive. Required public notification through print media has become obsolete with the

advent of information efficiency that has been achieved by the internet. The ability to post a Con Plan summary or the entire Consolidated Plan itself on a grantee's website eliminates the need to distribute hard copy documents to the public. Similarly, public notices posted on a grantee's website are available 24/7 for as long as the grantee determines and are much more effective at outreach than a one-time publication of a notice in a newspaper of general circulation. HUD should allow grantees to simply post the draft Con Plan substantial amendments on their website for a public comment period for its formula grant programs.

13. When IDIS was created the report function changed the formats in which reports could be downloaded by grantees. Format choices for standard reports are now limited to PDF and Excel. Prior to IDIS Online grantees could download reports and save them as WORD files. This permitted grantees to insert the IDIS reports in the CAPER file, thereby making it easier to save the entire CAPER as one electronic file [WORD and/or Acrobat]. Please return the capability for grantees to download IDIS reports into WORD.

14. 24 CFR 91.415/91.420. HUD provided software to entitlement grantees (Community 2020) which permitted the creation of Action Plans that could be uploaded by HUD into IDIS. HUD has abandoned this practice, resulting in a burden on grantees to manually enter all projects and activities into IDIS. Permit grantees to upload Action Plan data directly into IDIS, as with Community 2020. This would make it possible for HUD field staff to perform on-line reviews as is currently being done through the NSP DRGR system.

15. 24 CFR 91.520. CAPER instructions specify which reports from IDIS are to be made available for review by the public with the draft CAPER, but the instructions are unclear as to which IDIS reports are to be submitted to HUD as part of the CAPER. HUD field staff should be better trained on how to obtain IDIS reports from their grantees. It should not be necessary for grantees to print hundreds of pages of IDIS reports for submission to HUD. HUD should only require the submission of those IDIS reports that are essential to the review of the CAPER. Please instruct field staff to refrain from asking grantees "we know it's not required, but we would really appreciate it if you [the grantee] would print all of the IDIS reports and include them with the CAPER."

16. 24 CFR 92.150. The CAPER contains the original Annual Performance Report form and the Matching Funds Report form that were created by HUD before IDIS. Craft new IDIS reports that would provide this data to HUD and grantees. Matching funds information should be captured in IDIS in the same level of detail as is required in the HOME Matching Fund Report.

17. 24 CFR 91.520. The CAPER requires financial and services data for entitlement programs, but it does not provide a consistent format for the report of the data in the CAPER narrative. Extract the data from IDIS and produce these data for the CAPER via IDIS reports. CDBG and ESG now have a Financial Summary Report. Add one for HOME. Also add a Matching Funds Report for ESG.

18. Duplication of Reporting/Reporting Burden. Under reporting guidelines (24 CFR § 92.509), participating jurisdictions are required to report twice on activities that have received both HOME and CDBG funds, once for HOME Program and a second time for the CDBG Program. This duplication of reporting imposes an unnecessary administrative burden on grantees. As a result, the unit count is reported twice and artificially inflated for an individual project receiving both HOME and CDBG funds. In addition, staff must report on the same outcome and expenditure rate information. We recommend the elimination of this duplicative requirement and a streamlining of the reporting process to ensure that one (1) report captures all essential information. Whether large or small, each community that receives CDBG funding is subject to numerous reporting burdens. While many are necessary for ensuring compliance, indicating accomplishments and verifying transparency, many are duplicative and onerous. Currently, CDBG communities must provide a Citizen Participation Plan, 5 Year Consolidated Plan, Annual Action Plans,

annual CAPER, quarterly financial reports (SF-425), annual Section 3 reporting, annual MBE/WBE report, separate IDIS input for each activity, environmental review for each activity, floodplain management review, sub-recipient monitoring, FFATA reporting, CCR/DUNS reporting, Davis-Bacon monitoring and Semi-Annual Labor Reports, to name a few, as well as follow many recently updated OMB directives and OIG bulletins. The process is also now underway for incorporating a new Assessment of Fair Housing. These administrative burdens utilize valuable staff time and financial resources - time and money that could be better spent on needed projects and programs. It is also questionable how meaningful efforts are being made in paperwork reduction when more complex reporting requirements are added each year.

19. Consolidation of Federal On-Line Systems: The federal government maintains too many on-line systems. Communities are required to maintain many logins/passwords such as the Federal Service Desk, fsrs.gov/esrs, IDIS, HEROES, Secure Systems/Spears, OneCPD, LOCCS, ELOCCS, Workforce1, HUD Exchange, System for Award Management, grants.gov, federalreporting.gov, etc. Unfortunately, many of those systems don't integrate. For instance, required FFATA information cannot currently be derived from IDIS. The federal government should examine all the reporting required for CDBG and then consolidate, update and streamline existing systems in order to avoid separate burdensome reporting, which would allow the federal branches one-stop shopping for all things CDBG, HOME, etc. This would also reduce the cost of maintaining numerous systems simultaneously.

20. CHDO Tracking in IDIS. The process for setting up CHDO activities is cumbersome, confusing, and administratively burdensome. First, to commit CHDO projects, two (2) steps are required: (1) increasing a sub-fund if the CHDO Reserve exceeds fifteen percent (15%); and (2) setting up a sub-grant. The sub-fund is used to earmark and track CHDO funds, while the sub-grant is used to track organizations that receive CHDO funds. The additional step of setting up a sub-grant is unnecessary because tracking organizations that have received CHDO funds can be accomplished in IDIS via the Activity Set-Up Screen. Furthermore, elimination of the sub-grant step will alleviate CHDO commitment tracking by grant year, which has been difficult to manage when grants span across multiple years. In our experience, tracking of this sort does not provide any added value. We recommend the elimination of the sub-grant step from IDIS to streamline the CHDO set-up process and facilitate the ease of management. Second, additional challenges are presented when revising draws for CHDO activities. Unlike with entitlement activities, IDIS does not allow participating jurisdictions to revise CHDO draws unless it is the same CHDO organization. This inflexibility creates an administrative burden by requiring the Commission to return money to the Treasury instead of revising the drawdown for other activities. We recommend modifying IDIS to permit revision of the drawdown for CHDO activities.

21. Program Income. Participating jurisdictions must report in IDIS the amount of Program Income they have available, and this income must be used prior to drawing down funds from the Treasury (24 CFR § 92.502). The procedure for documenting the income consists of several steps, including the creation of a Receipt Fund in IDIS to enable drawdown of Program Income. In previous versions of IDIS once Program Income is "receipted" IDIS automatically adjusts the Entitlement Fund and Program Income as available for drawdown. In the current version of IDIS, however, the Entitlement Fund and Program Income must be adjusted manually. This manual adjustment has proven administratively burdensome. We recommend that when the Receipt for Program Income is created in IDIS, the system automatically appropriate funds available for drawdown.

22. Eligibility matrix code 14H is used for Rehabilitation Administration, which represents time spent on rehabilitation activities (i.e. from application through construction completion). This eliminates the need for staff to have to keep track of time for each individual rehabilitation project. Because first time homebuyer projects are also time consuming (as households work through pre-qualifications, home inspections, underwriting and loan closings), it would be beneficial to have a similar FTHB administrative matrix code. Create a CDBG eligibility matrix code for First Time Home Buyer Administration.

23. AFH/Con Plan Integration. Make the data in the AFH and/or the 5-Year Con Plan interchangeable and streamlined and better integrate the documents to avoid duplication, reduce paperwork, reduce burden, and increase efficiency by integrating the two documents. Integrate the AFH with IDIS consolidated planning as an additional template in the IDIS e-Con Planning suite, not another free-standing system.

24. Con Plan. The required data collection and input is excessive. Many sections could be streamlined or eliminated. For instance, for the Consolidated Plan, the report asks to list the agencies and organizations that participated in the process – a fair question. However, it further requests information on what section of the plan was addressed by each consultation and then how the agency was consulted and the anticipated outcomes. Why does it matter if the consult was by phone, email or in persons? Anticipated outcomes are part of the overall strategic plan, so why include separate outcomes by agency?
    - Eliminate Table 2;
    - Eliminate SP-40 (Table 48), an onerous and unnecessary list;
    - Eliminate SP-70 as the entire Consolidated Plan is essentially an anti-poverty strategy; and
    - Review all sections for areas that can be removed for which they do not contribute relevant information for providing basic, core activities for housing, economic development, infrastructure and public services.
    - Allow members of consortiums to be responsible for submitting Consolidated Plan addendums, without having to involve the lead consortium community.

25. Action Plan: The Annual Action Plan requires a process that takes approximately 5 months - a 5-month process to create an annual one year plan. And, in general, when printed, it is not a user-friendly document for the layperson.
    - Reduce the public comment period from 30 days to 14 days.
    - Many of the tables could be combined to produce a much easier-to-understand summary of activities proposed.
    - Allow members of consortiums to be responsible for submitting the Action Plan, without having to involve the lead consortium community.

26. CAPER: Like the Action Plan, in general, when printed, this is not a user-friendly document for the layperson.
    - Many of the tables could be combined to produce a much easier-to-understand summary of activities conducted.
    - Remove questions that ask about "actions planned" (i.e. AP-85). These are addressed in the Action Plan.

27. MBE/WBE report. MBE/WBE is used to assure that minority-owned and women-owned businesses are afforded contracting opportunities. In Massachusetts, the state has an on-line tool to search for MBE/WBE businesses. However, federal reporting is archaic in that reporting is not completed on line. Like other reporting requirements, it should be integrated with existing reporting systems. Federal officials could then download the MBE/WBE data alone or in combination with other CDBG-related data. Update IDIS to allow for inputting the vendor information through the activity where the vendor was utilized, so that the data can be downloaded directly by federal officials without the need for the municipality to send a separate report.

28. The following are suggestions for tweaks to IDIS that would simplify data input:
    - The Activity Funding page should keep a balance available to draw for each type of funds (program income, entitlement and total funds available).
    - When submitting a program income receipt, remove the requirement of indicating the IDIS Activity ID for which the program income is attributed. Program income that is received monthly from banks

lumps several loan payments together. To separate them is onerous; to put them together under one ID is erroneous.

- Create a report for funds leveraged. This information is entered into the systems by each community and should be easy to generate into a report.
- When a drawdown is made in error under a specific activity (ie. 0001) utilizing program income funding and needs to be changed to a different activity (i.e 0002), it can only be done if there are PI funds in activity 0002. The community must wait until it has received additional PI to fund activity #0002, before the transfer can be made, make the transfer and then move the PI funds in #0001 to another activity. This is all rather complicated and unnecessary.
- Improve the "address" in the CDBG set-up for projects that have no specific address (ie. street resurfacing on several streets in a LMI area, or at the intersection of 2 streets).
- In the CDBG Accomplishment Detail (page 2), remove the section regarding new access, improved access, or access no longer substandard. This is unnecessary and provides no real meaningful data.

Thank you for the opportunity to provide comments. These comments are endorsed by the U.S. Conference of Mayors. Please feel free to contact Vicki Watson, Executive Director, NCDA at 540-656-9552 with any questions.

Sincerely,
National Community Development Association
U.S. Conference of Mayors