

CHAPTER 17: IDIS ONLINE AND CDBG



CHAPTER PURPOSE & CONTENTS

This chapter summarizes the key objectives, functions, data entry, and reporting requirements of the Integrated Disbursement and Information System (IDIS) Online. This chapter will not cover in detail all of the requirements of IDIS Online, but is meant to be an overview of various areas related to compliance and accurate reporting of accomplishments.

SECTION	TOPIC
17.1	Overview of IDIS Online
17.2	Data Entry
17.3	Reporting

17.1 Overview of IDIS Online

- ✓ The Integrated Disbursement and Information System (IDIS) Online is the management information system used for all four CPD formula programs: CDBG, the HOME Investment Partnerships program, Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The system is accessed through the HUD website and is secured by HUD-issued IDs and passwords. The information entered into IDIS Online is instantly available to HUD. HUD aggregates the data at the national level to demonstrate program results and benefits of the four CPD formula grant programs. The 2012 rule mandates the annual entry of data to show accomplishments for each program year.
- ✓ The following is a summary of the topics in this section, applicable statutory and regulatory cites, and other reference materials available from HUD.

Key Topics in This Section	<ul style="list-style-type: none">✓ Objectives of IDIS Online✓ Use of IDIS Online Throughout the Program Year
Other Reference Materials on This Topic	<ul style="list-style-type: none">✓ OneCPD IDIS<ul style="list-style-type: none">- https://www.onecpd.info/idis (links to training, reports, etc.)

17.1.1 Objectives of IDIS Online

- ✓ There are two key objectives of the Integrated Disbursement and Information System (IDIS) Online:



- First, it enables states to draw down CDBG funds.
- Second, IDIS Online is a data collection and reporting tool states use to record the results of CDBG-funded activities. IDIS Online is the tool used to report CDBG accomplishments to HUD, including the CPD Performance Measurement data elements.
- ✓ States use IDIS Online to request disbursements from their CDBG grant funds. CDBG funds are held by the U.S. Treasury until the state is ready to expend the funds. When the state is ready to spend the grant funds, they use IDIS Online to request a drawdown of their funds. Once the request is processed, the funds are wire-transferred, or disbursed, to the state's bank account. It is important to note that IDIS Online is a reporting system and not an accounting system. Local accounting systems must be used in addition to IDIS Online to ensure proper management of funds.
- ✓ IDIS Online also provides states with a mechanism to describe activities assisted with CDBG funds. The information captured by IDIS Online helps demonstrate to HUD that each funded activity was eligible and met a national objective. The system also collects accomplishment and performance measurement data and, therefore, plays an important role in the CPD Performance Measurement Initiative. By having all states use the system, the data is collected in a standard format that enables HUD to easily aggregate the data at a national level. IDIS Online collects, consolidates, and reports data on the results of CDBG-funded activities.

17.1.2 Use of IDIS Online throughout the Program Year

- ✓ The annual planning cycle can be divided into a planning phase at the start of the program year, a delivery phase, and a reporting phase at the end of the program year. At each phase, the state will perform different tasks in IDIS Online. While the tasks listed below are not exclusive to any phase, this is the order they are usually encountered.
 - Start of the Program Year: Once a state has submitted its Action Plan to HUD and signed its grant agreement with HUD, it will use its Method of Distribution to make awards to Units of General Local Government (UGLG). The state will enter data for these awards as “projects” and “activities” into IDIS Online. Once HUD loads the new grant amount into IDIS, the state can commit funding to each activity.
 - Program Year – Implementation: Throughout the program year the state will incur expenses and use IDIS Online to request drawdowns from their grant funds to pay for these expenses. The state will also use IDIS Online to report the receipt and use of program income. It is strongly recommended that accomplishment data is entered into the system throughout the program year. If the state waits until the end of the year to enter data, not only will the workload be heavy at that point, but also there is an increased chance of errors in data entry due to the passage of time. Updating more frequently also provides HUD with more current data it can use to respond to various requests from stakeholders.
 - End of the Program Year – Reporting: At the end of the program year, the state will use IDIS Online to enter accomplishment data and performance measures and indicate which activities have been completed. Once the information is entered, the state can use IDIS Online to print out standardized reports that contain information that must be included in their annual report. **States are required to use IDIS to report on benefits realized during the program year before the submission of their annual PER to HUD.** It is



unacceptable to wait until a project is completed and closed out to report beneficiary information in IDIS.

17.2 Data Entry

- ✓ Data entry tasks can be organized into the following tasks: adding projects and activities, funding activities, creating and approving drawdown requests, receipting income, and reporting accomplishment data. Consistency of reporting on IDIS Online activities is crucial, and policies and procedures must be incorporated into day-to-day program management. The following is a summary of the topics in this section, applicable statutory and regulatory cites, and other reference materials available from HUD.

Key Topics in This Section	<ul style="list-style-type: none"> ✓ Data Entry ✓ Key Data Fields ✓ Common IDIS Online Errors to Avoid
Regulatory/Statutory Citations	§570.483
Other Reference Materials on This Topic	<ul style="list-style-type: none"> ✓ OneCPD IDIS <ul style="list-style-type: none"> – https://www.onecpd.info/idis ✓ OneCPD Ask A Question (for technical assistance requests): https://www.onecpd.info/ask-a-question/

17.2.1 Data Entry

- ✓ States must enter data on several different levels within IDIS Online.
 - **Projects:** A state will add a new project in IDIS Online for each project included in the Action Plan, unless that project is a continuation of one from previous years and has already been entered into IDIS Online. This ensures that there is a parallel structure between the Action Plan, IDIS Online, and the CAPER reports that will be generated from IDIS Online. Projects mainly serve an organizational purpose and do not capture detailed information. Projects only capture enough data to give HUD an understanding of how the proposed use of funds is eligible. Detailed data are captured at the activity level.
 - **Activities:** To draw down funds and to capture detailed program related accomplishment data, a state will set up at least one activity under each project. Activities are the basic building blocks in IDIS Online. All funds are expended and all program accomplishments are reported at the activity level. For example, an economic development loan program must demonstrate that each business assisted with CDBG met a national objective on its own. In this case, each loan should be reported as a separate activity in IDIS Online. A project may have one or more activities.
 - **Activity Funding:** Once the basic data are entered for an activity into IDIS Online, the state can commit CDBG funds to the activity. This commitment process ensures that a state does not budget more money than what is available. Once funds are committed to one activity, those funds are shown as unavailable for all other activities. **For states, it is**



extremely important to indicate the correct Grant Year or Allocation Year from which the activity is funded.

- **Drawdowns:** A drawdown is a request for payment against a state's line of credit. States create a voucher in IDIS Online to draw down funds. States draw funds as required to pay for work that has occurred for an activity. Once the state creates and approves a drawdown voucher in IDIS Online, HUD will process the voucher request and wire-transfer the requested amount to the state in two to three business days.
- **Receipting Income:** When CDBG activities generate program income expenses for an activity, the state will create a receipt to report that availability of the income. The state will report the use of program income through the drawdown process. All CDBG program income, as defined by the CDBG regulations at 24 CFR 570.489(e), must be reported in IDIS, regardless of whether the income was received by the state, a unit of general local government or a subrecipient of a unit of general local government. Program income retained by a unit of general local government to continue an activity must also be reported in IDIS.
- **Reporting Accomplishments:** At the end of the program year, the state will use IDIS Online to enter accomplishment data and performance measures for each activity that was open or completed within the program year. States are required to use IDIS to report on benefits realized during the program year before the submission of their annual PER to HUD. It is unacceptable to wait until a project is completed and closed out to report beneficiary information in IDIS.

17.2.2 Key Data Fields

- ✓ The combination of an activity's matrix code and national objective play a key role in determining the type of accomplishment data required for the activity. It is important to note that not all combinations are allowed. The reference document entitled "Guidance for Reporting CDBG Accomplishments in IDIS" provides guidance on what combinations are allowed. An updated version of this document based upon IDIS Online is at the end of the chapter as Exhibit 17-1.

IDIS matrix code examples:

- ✓ 03A - Senior Centers
- ✓ 03C - Homeless Facilities (not operating costs)
- ✓ 14A - Rehab single unit residential
- ✓ 18C – Micro-enterprise assistance

Matrix Codes

- ✓ The matrix code indicates how the activity is eligible under CDBG regulations. It is an important data element that states must know at the beginning of the program year. The matrix code generally identifies the purpose for which assistance was provided.
- ✓ Assigning correct matrix codes and national objectives to activities is important, not only in recording the eligibility of activities, but also in accurately reporting accomplishment data.
- ✓ When HUD aggregates accomplishment data to the national level to fulfill reporting requirements to Congress or provide requested information, data in IDIS Online are generally aggregated by matrix code. Therefore, states across the country must be consistent in uniformly applying matrix codes to activities.



- ✓ States should choose the most specific code that relates to the activity they are funding. States should avoid using general matrix codes when more specific codes have been provided, such as public services as 05, versus 05U for housing counseling (please note that this is a relatively new code).
- ✓ One of the most common errors in the use of matrix codes in IDIS Online is to use the matrix codes for Homeownership Assistance, 13 and 05R, for activities that solely provide housing counseling. Homeownership Assistance activities provide financial assistance to homebuyers and may provide housing counseling services for those homebuyers. However, the accomplishment data required for these activities are the number of households receiving financial assistance, not the number receiving housing counseling. In the Accomplishment Detail screens for these activities, HUD asks, of those homebuyers receiving assistance, how many received housing counseling, but that is the only place the number of households receiving housing counseling is reported for Homeownership Assistance Activities.
- ✓ States should check with HUD if they are unsure about the choosing the most appropriate IDIS matrix code.
- ✓ IDIS Online has two new matrix codes specifically for state use:
 - **State Planning Only (20A)** should be used for awards to units of general local government for which planning is the only activity, or in which planning activities are unrelated to any other activity funded as part of the grant. These are often referred to as “planning-only grants” or “planning-only activities.” For more information , refer to 570.483(b)(5) and 570.483(c)(3).
 - **State Administration (21J)** should be used for costs incurred by the state to administer the CDBG program.
- ✓ A copy of the current IDIS matrix codes is attached to this chapter.

National Objectives

- ✓ All CDBG-assisted activities, except for planning and administrative activities subject to the state’s administrative cap, must meet a national objective. One of the key functions of IDIS Online is to demonstrate how each funded activity meets a national objective. It is important to note each national objective will require different types of data to demonstrate compliance. Therefore, the IDIS Online data collection screens will change depending on the national objective selected. States are encouraged to preview all of the data collection screens for the selected national objective at the beginning of the year to understand what type of data is required.
- ✓ There are three national objectives under CDBG, including:
 - Benefit to LMI persons (e.g., area benefit, limited clientele, jobs, and housing).
 - Prevent or eliminate slums and blight on an area or spot basis (note that the Urban Renewal approach to Slums and Blight is used by entitlements but is not applicable to the state program).
 - Meet an urgent need.
- ✓ In addition, a minimum of 70% of the state’s CDBG program expenditures must meet the LMI benefit national objective.



Grant Year

- ✓ When funding an activity, the state must indicate the Grant Year from which the activity was funded. Correct use of this field will ensure the activity is included correctly in the PER report.

Report Year / Program Year

- ✓ All accomplishment data reported in IDIS Online is assigned to a specific Program Year. Accomplishments must be reported by the Program Year in which they are realized (as opposed to Grant Year from which the activity was funded).
- ✓ When a CDBG activity is open for more than one program year, the state must add a new program year on CDBG Accomplishment Detail (Page 1) by clicking the “Add New Accomplishment Year” button. All of the data reported on Accomplishment Detail (Page 1) and Accomplishment Detail (Page 2) refer to a specific program year.
- ✓ To the extent possible, the system will verify the accuracy of accomplishment information. For example, the system will compare the total beneficiaries reported in the Race/Ethnicity section to the total beneficiaries reported in the Income Levels section. If they do not equal, the system will display an error and will not allow the user to save the data until the error is corrected.

Activity

Edit CDBG Accomplishment Detail (Page 1)

05M - Health Services

Save | Save and Continue | Cancel | Delete

View Totals All Years | Add New Accomplishment Year

Add New Accomplishment Year

*** Indicates Required Field**

Grantee/PJ Activity ID: 12345678	Activity Name: Angels for Sight
IDIS Activity ID: 664	Activity Owner:
National Objective: LMC	

Accomplishments for Program Year: 2009

Select Another Year:

2009
2010
2009

Edit Selected Year

Accomplishment Narrative: (maximum 4000 ch

Select Accomplishment Year



17.2.3 Common IDIS Online Errors to Avoid

- ✓ HUD has published guidance for States which addresses the types of common errors encountered and identifies the steps that should be taken to correct them – or prevent them in the first place. An updated version of this document, *Guidance for Improving the Quality of CDBG Accomplishment Data in IDIS Online*, may be found at the end of this chapter.
- ✓ In general, states should avoid the following common IDIS Online errors:
 - **Data entry is late and data is inconsistent across activities.**
 - **Information is incomplete.** It is important to note that missing, inaccurate, and incorrect data result in reports that present a misleading—and sometimes negative—picture of program accomplishments. Incorrect IDIS Online data reflect unfavorably on the CDBG program because HUD cannot accurately report on program performance. Incomplete data results in an undercounting of CDBG achievements which results in minimizing the program contributions to meeting the community development needs of LMI persons.
 - **Accomplishment Information is duplicated.** States should ensure that accomplishment information is not duplicated across multiple activities.
 - **Leveraged funds data is missing or inaccurate.** Ensure that all leveraged funds are entered on the *correct* line on CDBG Setup Detail (Page 2). The CDBG amount on this screen is a protected field. Several states, unable to enter their CDBG funds on this line, have entered their CDBG funding amount on the Section 108 line, even though they do not have a 108 loan guarantee. This has resulted in inaccurate leveraging data for the CDBG program.
 - **Beneficiary income data is inaccurate.** Some states, 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 State grantees are ignoring the program’s legislative mandate to assist extremely low- and low-income persons and households. Report income level data in the appropriate categories, including extremely low, low, moderate, and non-low/moderate on CDBG Accomplishment Detail (Page 1).
 - **Income level data for presumed benefit activities is missing.** The Income Levels data on CDBG Accomplishment Detail (Page 1) must be completed for presumed benefit activities, even though states are not required to obtain income records for those beneficiaries. The CDBG program has provided guidance for reporting Income categories that should be used for presumed benefit groups (Page 17-14). Unless there is reason to believe that another income level is more appropriate for a presumed benefit group, states should use the income levels suggested by HUD.
 - **Counts of jobs created/retained are inaccurate.** In a given program year, do not report the same jobs under more than one activity. Do not report the same jobs in multiple program years. In other words, only report one job, one time. Report all the jobs created/retained; do not report only the LMI jobs or the total population of a jurisdiction.
 - **Accomplishment data is missing for activities tracking activity delivery costs.** Ensure that accomplishments are reported for Economic Development activities (18*) tracking only activity delivery costs and Rehabilitation Administration (14H) activities where CDBG funds are used only to run loan or grant programs and funds other than CDBG are used to actually carry out the activity.



- **For reasons of privacy, states should not use the names of persons/households receiving assistance in the Activity Name field.** This problem most often occurs in housing rehabilitation activities.
- **Enter the correct address.** When entering an address for an activity, except for administrative activities, specify the activity's physical location, not P.O. boxes or the address of the government agency administering the activity, in the Address/Location field. For administrative activities, enter the address of the organization administering the activity. For activities that serve an area rather than a specific address use the fields available to provide a description of the area or "community-wide".
- **States should report on only one assisted business for each activity that provides direct financial assistance to businesses.** Set up a separate activity for each business receiving direct economic development assistance under matrix code 18A or 18C. If more than one business is reported in a single activity, the CDBG program cannot determine whether each business has met a national objective.

17.3 Reporting

- ✓ The following is a summary of the topics in this section, applicable statutory and regulatory cites, and other reference materials available from HUD.

Key Topics in This Section	<ul style="list-style-type: none"> ✓ IDIS Online Reports ✓ Grantee Reports
Regulatory/Statutory Citations	§570.491
Other Reference Materials on This Topic	<ul style="list-style-type: none"> ✓ OneCPD IDIS User Guide: https://www.onecpd.info/resource/2533/idis-online-reports-user-guide/ ✓ Guidance for Reporting CDBG Accomplishments and Performance Measurement in IDIS: https://www.onecpd.info/resource/3085/guidance-for-reporting-cdbg-accomplishments-performance-measures-idis/

17.3.1 IDIS Online Reports

- ✓ States can run a variety of reports in IDIS Online to ensure data is accurate and complete for their activities. IDIS Online includes a new, more intuitive reporting module that allows the user to quickly generate readable reports.
- ✓ States should review the following key CDBG reports at least annually and more often as possible. Please note the first three may also be used for the PER submission.
 - **The PR28: Reporting Requirements for the State PER** provides guidance for submission of the PER for grantees under State CDBG. The Financial Summary provides information on the CDBG resources available and expenditures incurred for a specified grant allocation. The expenditures are summarized to determine the percent expended for LMI, planning/ administration, and public service activities. The Financial Summary needs to be generated for each Grant Year that was open during the program year. The Activity



Summary provides comprehensive information about each CDBG activity which was open or had draws during a program year. The Activity Summary includes activities from all Grant Years open during the program year and does not need to be generated separately for each Grant Year.

- **The PR57: Timely Distribution of State CDBG Funds** replaces Notice CPD 11-05 and reiterates HUD's policy and standards for the timely distribution of Community Development Block Grant (CDBG) funds by states. States administer the program but must distribute the funds to local governments, which carry out eligible activities.
 - **The PR23: Summary of Accomplishments** presents data on CDBG activity counts and disbursements. It also contains data on CDBG accomplishments. This report satisfies the specific CDBG public participation requirements to show the number of persons served for public services and the number of public facilities and improvement projects assisted and completed.
- ✓ In addition there are new performance measurement reports now available within IDIS Online.
- **The PR83: CDBG Performance Measures Report** displays all CDBG performance data by objective and outcome for public facilities/improvements, public service, housing, homeless, and economic development activities for a particular program year.
 - **The PR84: CDBG Strategy Area, CDFI, and Local Target Area Report** displays CDBG performance measurement data for these areas.
 - **The PR85: Housing Performance Report** displays a summary of Housing Units rehabbed and Dollars expended by Objective and Outcome. These data are for activities completed during a selected program year.

17.3.2 Generating the PER from IDIS

- ✓ States will need to generate the PR28 CDBG State PER Financial Summary for each Grant Year that was open during the program year. Please note that HUD does not recommend using the IDIS Online version for Grant Years before 2007. States only need to generate one PR28 State PER Activity Summary Report.
- ✓ Once logged into IDIS Online, click on the Reports Tab located at top right corner of the IDIS Online screen. The system will display the Report Parameters Screen.
- ✓ Click on the Add-Edit link for the CDBG State PER Report. The system will open the report parameters screen for the Financial Summary portion of the PER.

Report Number	Report Name	
C04PR26	CDBG Financial Summary Report	Add-Edit
C04PR28	CDBG State PER Report	Add-Edit
C04PR84	CDBG Strategy Area, CDFI and Local Target Area Report	Add-Edit

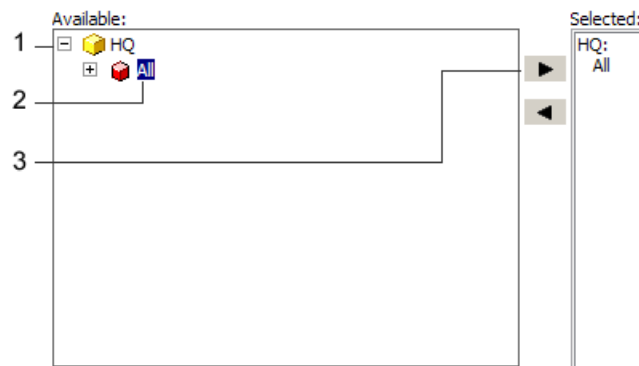


- ✓ Complete the parameters screen for the Grant Year for which you want the report. The screen will default to the last Grant Year entered. To select a different year, either select it from the “Select another year” dropdown list and click Edit Selected Year or click the Add Another Year button. A full version of the parameters screen is included in Exhibit 17-2. After making all necessary adjustments, make sure to save the changes by clicking the Save button.

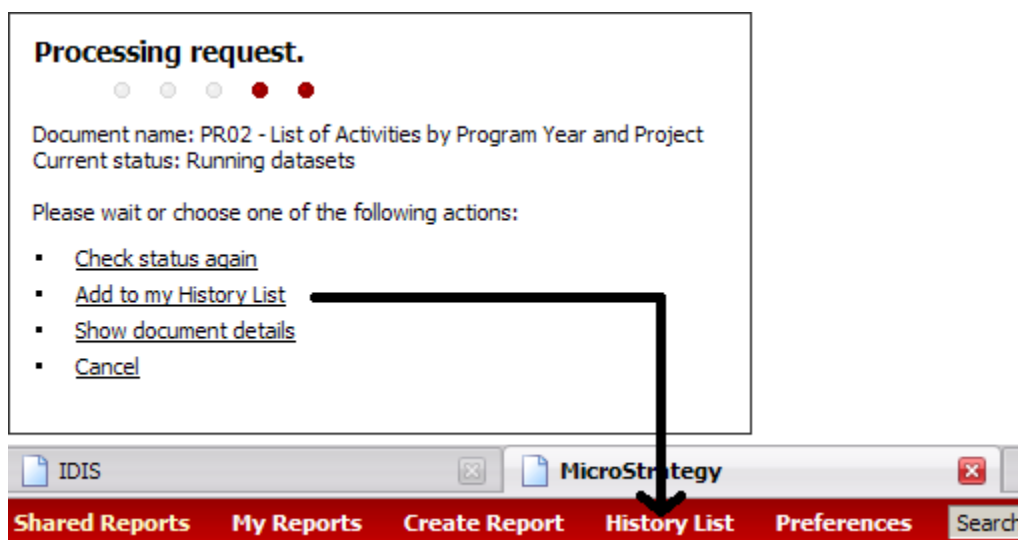
Report Parameters for Grant Year: 2008		Select another year: (tip) 2008 ▼
<input type="button" value="Add Another Year"/>		<input type="button" value="Edit Selected Year"/>

Line Number/Parameter	Value (tip)
04. Adjustment to compute total program income	<input type="text" value="0.00"/>
06. Section 108 Loan Funds	<input type="text" value="0.00"/>
10. Adjustment to compute total obligated to recipients	<input type="text" value="0.00"/>
13. Adjustment to compute total set aside for State Administration	<input type="text" value="0.00"/>

- ✓ Back on the Report Selection Page, click on the View Reports link located on the Reports menu along the left side of the IDIS Online screen. The system will open a new browser window or tab containing the MicroStrategy reports module (Please note that you are still logged into IDIS Online and if there is no activity within the IDIS Online window for twenty minutes, you will be logged out of both IDIS Online and MicroStrategy. To stay logged in, click back to the IDIS Online window and click on any link to stay active).
- ✓ Click on the IDIS folder.
- ✓ Click on the Shared Reports folder.
- ✓ You will see a folder for each available report. Click on the folder labeled “PR 28 - CDBG State PER”. The folder will open and display two reports, the PR 28 - Activity Summary and the PR 28 - PER Financial Summary. Click on the report that you would like to generate. Alternatively, you can click on the Export or PDF link to export the report directly to a Microsoft Excel format or Adobe Acrobat format.
- ✓ The system will display the parameters page. This page allows you to limit the data to be included on the report. For all reports, you must navigate through the Grantee Hierarchy to select your grantee.
 - In Internet Explorer (see graphic below):
 - Click on the plus sign to the left of HQ.
 - A second level will appear labeled All. Click on the word “All”.
 - Click the right arrow button.



- In Firefox, All is listed as the default selection. Simply click the right arrow button to move All to the right column.
- ✓ The system will also display a parameter for the program year. When running the Financial Summary Report, enter the Grant Year of the report you want to generate. When running the Activity Summary Report, enter the Program Year to generate a report that includes all activities that were active during the Program Year, regardless of the Grant Year.
- ✓ At the bottom of the screen, click the Export button. At this point, the system will begin to process the report. The process can take several minutes. You have the option of adding the report to your History List (see graphic below). Once the report is added to the History List, you can retrieve it at a later time by clicking on the History List link in the MicroStrategy menu located at the top of the window.



- ✓ Once the report is ready, the system will display the report based on the options selected in the steps above (MicroStrategy, Excel, or PDF).



Attachment 17-1: Guidance for Improving the Quality of CDBG Accomplishment Data in IDIS Online

HUD uses IDIS Online 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 Online 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 Online 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. For more detailed guidance, download the latest version of the “Guidance on Reporting CDBG Accomplishments in IDIS Online/Sample Accomplishment Reports” <https://www.onecpd.info/resource/3085/guidance-for-reporting-cdbg-accomplishments-performance-measures-idis/>

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 Online by some states.</p>	<p>Enter accomplishment data as frequently as possible.</p> <p>Annual reporting is required and HUD has encouraged states 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>Incorrect matrix codes</p> <p>When CDBG aggregates IDIS Online data to the national level, it is generally by matrix code. Therefore, States across the country must be consistent in uniformly applying matrix codes to activities.</p>	<p>States 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



	<p>matrix code when down payment assistance is provided as a public service. If housing counseling is provided to those applying for down payment 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 down payment; 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 in the Funding Sources on the CDBG Setup Detail (Page 2).</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 the CDBG Setup Detail. States 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>
Inaccurate beneficiary income data on the Accomplishment Detail	Report income level data in the appropriate categories (extremely low, low, moderate, and non-low/moderate) on the



<p>screen on (Page 1).</p> <p>Some states, 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 States are ignoring the program’s legislative mandate to assist extremely low- and low-income persons and households.</p>	<p>Accomplishment Detail screen on (Page 1).</p>
<p>Inaccurate counts of jobs created and retained</p> <p>Analysis of the jobs data indicates that some States are reporting the same jobs multiple times.</p>	<p>Follow these guidelines to avoid over-counting/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 information should not be completed for the activity tracking the activity delivery costs. States should instead associate this activity to the activity where the jobs are reported by entering “Y” in the “Will accomplishments be reported at another activity?” field on the CDBG Setup Detail (Page 1) 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.
<p>Missing or incomplete Performance Measurement (PM) data</p>	<p>Ensure that PM data is reported for all activities open on or after October 1, 2006. In addition to completing the Accomplishment Detail screens, be sure to fill in the applicable special attributes fields (e.g., Colonia, Brownfield Activity, Historic Preservation Area, Strategy Area) the on the CDBG Setup Detail (Page 1) screen.</p> <p>Review the PR83, PR84, and PR85 reports to determine the general level of Performance Measurement data that has been input.</p>
<p>Activity name on the Add/Edit Activity screen and Address data on the CDBG Setup Detail (Page 1) screen.</p>	<p>For reasons of privacy, states 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 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 Income Levels data on the CDBG Accomplishment Detail (Page 1) screen must be completed for presumed benefit activities, even though states 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 border="0"> <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 beneficiaries as moderate income</td></tr> <tr> <td></td><td>If assistance is for other services (not center-based), report the elderly beneficiaries as low income</td></tr> </table> <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>	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 beneficiaries as moderate income		If assistance is for other services (not center-based), report the elderly beneficiaries as low income
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 beneficiaries as moderate income																		
	If assistance is for other services (not center-based), report the elderly beneficiaries as low income																		
<p>Economic Development (18*) activities reporting more than one business assisted</p> <p>The fact that the “Assistance to Businesses” fields allows states to report more than one business assisted does not mean that assistance to individual businesses under 105(a)(17) [matrix code 18A] and 105(a)(22) [matrix code 18C] may be aggregated in one activity. Unless the assisted activity is one identified at 570.483(b)(4)(vi) for which job aggregation is allowed, each business assisted under matrix code 18A and 18C must be reported</p>	<p>Set up a separate activity for each business receiving direct economic development assistance under matrix code 18A or 18C.</p>																		



separately.	
Missing accomplishment data for activity delivery cost activities with a matrix code of 18* or 14H	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, <i>if</i> CDBG is not used to make the loans/grants. (If CDBG is also used to make the rehab or economic development loans/grants, states should answer “Y” in the “Will accomplishments be reported at another activity?” field on the CDBG Setup Detail (Page 1) screen.)



Appendix 17-2: CDBG State PER Financial Summary Parameters

Line Number/Parameter (IDIS PR28)	Value		
04. Adjustment to compute total program income			
06. Section 108 Loan Funds			
10. Adjustment to compute total obligated to recipients			
13. Adjustment to compute total set aside for State Administration			
16. Adjustment to compute total set aside for Technical Assistance			
18. State funds set aside for State Administration match			
21. Adjustment to compute total redistributed			
24. Adjustment to compute total not yet redistributed			
27. Adjustment to compute total retained			
30. Adjustment to amount drawn for State Administration			
33. Adjustment to amount drawn for Technical Assistance			
36. Adjustment to amount drawn for Section 108 Repayments			
39. Adjustment to amount drawn for all other activities			
42. Adjustment to compute total disbursed for PS			
47. Adjustment to compute total subject to PS cap			
51. Adjustment to compute total disbursed for P/A			
56. Adjustment to compute total subject to P/A Cap			
59. Period specified for benefit: grant years			
60. Final PER for compliance with the overall benefit test:	Yes or No		
	Grant Year 1	Grant Year 2	Grant Year 3
62. Benefit LMI, 108 activities			
63. Benefit LMI, other adjustments			
66. Prevent Slum/Blight, 108 activities			
69. Meet Urgent Needs, 108 activities			