

# MODULE 7: NEW CDBG OVERSIGHT FUNCTIONALITY



# More Oversight Needed

- HUD OIG cited need to use IDIS to improve oversight of:
  - Long-standing, open activities (at-risk)
  - Cancelled activities with draws
  - Draws revised from one activity to another
- Changes in IDIS:
  - Flag at-risk activities
  - Require justifications (remediation plans)
  - Require field office review and approval
- **Meant to serve as management tools, not compliance tools**

# At-Risk Activities

- **At-Risk activities include:**
  - No draws for a year
  - No accomplishments for three years
  - Activities that have 80 percent of their funding amount disbursed and no accomplishments reported
- **Each at-risk activity requires Remediation Plan\***
  - Reasons for Delay
  - Action Plan for resolving the delay
  - Timeline for completing Action Plan (within six months)

\*If grantee can cancel/complete activity, remediation plan is not needed

# Remediation Plans

- Short term actions to move a stalled activity forward/resolve the delay
- At a minimum, provide a timeline for drawing additional funds or reporting accomplishments, and outline when the grantee expects to complete the activity.
- Does not have to be completed or cancelled within the six month timeframe

# New IDIS Features

- Orange Banner at the Top of the IDIS
- Review Activities Screen
  - Awaiting Remediation
  - Awaiting Field Office Review
  - Not Accepted by Field Office
  - Remediated by Grantee
  - Pending at Risk
- CDBG Activities At Risk Report (PR59)

# At-Risk Review Process

- 90 days/2 weeks to submit Remediation Plan
  - Plan can be edited until field office acts
  - Consult with its F.O. to ensure timeline and actions are reasonable
  - Failure to submit plan => complete activity or cancel the activity and return all drawn funds
- Field office approves or disapproves
  - Plan is read only
  - Approval => carry out Remediation Plan
  - Disapproval => complete or cancel activity
- Grantee confirms actions have been taken
  - Failure to confirm => complete activity or cancel the activity and return all drawn funds

# May 2013 Changes

- Only one Remediation Plan will be required per At-Risk Activity
- Public facilities and economic development (except for 18B) exempt from the “80 percent disbursed” flag
- Due dates for Remediation Plans will appear on the Review Activities list

# Cancel An Activity with Draws

- Consult with F.O. before submitting a request to cancel an activity with draws
- Can no longer cancel an activity with draws without field office approval
  - Provide justification
  - Request is sent to the field office
- Field office will approve or disapprove the requests in IDIS
  - If disapproved, grantee must complete the activity or cancel the activity and reimburse all drawn funds.

# Revising a Voucher

- Justification required for each voucher revision from one activity to another
- HUD Field office staff can review grantees' justifications
- No field office approval is required

