



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of Community Planning and Development

Special Attention of:

NOTICE: CPD-12-009

**All CPD Division Directors
HUD Field Offices
HUD Regional Offices
All CDBG Entitlement Grantees
All CDBG State Grantees
All HOME Participating Jurisdictions
All ESG Formula Grantees
All HOPWA Formula Grantees**

Issued: April 30, 2012

Expires: April 30, 2013

SUBJECT: Use of the Integrated Disbursement and Information System (IDIS) to submit the Consolidated Plan

1. INTRODUCTION

This notice describes changes to the Consolidated Plan, within current statutory and regulatory provisions, for a new process for electronic submission including a required template and other improvements as follows:

- A submission template for the Consolidated Plan, the Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER) /Performance Evaluation Report (PER) for state grantees that will be required for all grantees receiving formula grants;
- Upgrades to the IDIS to facilitate electronic submission of the Consolidated Plan, Annual Action Plan and CAPER/PER according to the required template;
- New data describing a broad spectrum of community, economic and market conditions;
- A web-based data mapping tool to assist with place-based planning; and
- HUD's transition plan to implement the Consolidated Plan, Annual Action Plan and CAPER submission templates in IDIS.

Purpose

HUD is announcing new tools for the Consolidated Plan to support need-driven, place-based decision-making that will inform public participation and improve community and economic development outcomes. These tools are designed to make the Consolidated Plan useful beyond a budget exercise by integrating community need and market data and mapping capability into a new, electronic planning

template for Consolidated Plan preparation and submission. This template will also make planning and reporting more efficient by connecting the planning, implementation and performance reporting processes, eliminating redundancies and automatically entering data from HUD systems wherever possible.

Background

In 1995, HUD created the Consolidated Plan to serve as the planning document (comprehensive housing affordability strategy and community development plan) of state or local grantee governments and an application for funding under any of the Community Planning and Development formula grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) grant, Emergency Shelter/Solutions Grants (ESG), and Housing Opportunities for Persons With AIDS (HOPWA) grant. The Comprehensive Housing Affordability Strategy (CHAS) is a statutorily required planning tool under the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended (NAHA). The Community Development Plan is required under section 104 of the Housing and Community Development Act of 1974, as amended (HCDA). 24 CFR Part 91 contains the regulations that set forth the Consolidated Plan submission requirements. Part 91 states that a complete Consolidated Plan consists of required information “submitted in accordance with instructions prescribed by HUD (including tables and narratives),” or in such other format as jointly agreed upon by HUD and the jurisdiction or state (24 CFR 91.200 and 91.300).

The 1995 Consolidated Plan regulation created efficiencies for grantees by aligning program years and combining four separate grant application requirements into one consolidated submission. However, due to limitations in technology and data at that time, HUD did not establish the necessary systems, data or guidance to fully realize the sort of integrated planning envisioned by the Consolidated Plan regulation. The tools described in this notice take advantage of recent advances in technology and data to assist grantees in making strategic, targeted investment decisions in response to community needs.

2. CONSOLIDATED PLAN SUBMISSION TEMPLATE

All grantees are required to use the Consolidated Plan submission template. This requirement will make HUD’s expectations clear and create uniformity of review across all HUD field offices. This will also help grantees and the public to identify best practices when developing their plans by allowing them to search and compare the plans across similar jurisdictions.

Consolidated Plan citizen participation requirements remain in place. While Consolidated Plans will be prepared and submitted in IDIS, grantees will also be able to download draft versions to use during the citizen participation process. The template is designed to make the plans easy to understand, which will also facilitate stakeholder engagement in the public participation process.

Consolidated Plan

The new template in IDIS meets all applicable regulatory requirements. It eliminates redundancies in the Consolidated Plan Management Process (CPMP) template currently used by many grantees.

Moreover, the template has versions for local government, and state grantees to meet the specific needs of these grantee populations. There is also a version for HOME consortia and an option for multiple grantees to prepare one strategy as a region, with separate Annual Action Plans describing individual expenditure plans according to their regional strategy. Prior HUD efforts to provide a template for the Consolidated Plan did not include versions for states, consortia or regions. The template follows a logical planning sequence and allows each grantee the option to customize the plan to meet its needs by inserting additional text, data or maps throughout.

The new template follows the regulation by grouping housing, homeless, special needs and community development needs within a grantee jurisdiction in one needs assessment section to facilitate a comprehensive approach. Following the needs assessment, the template presents housing market conditions, homeless and special needs services and facilities, and community development assets in a comprehensive market analysis section. This arrangement will guide strategic investments and help the reader of the final Consolidated Plan to understand how the grantee's needs correspond to existing resources and the allocation of HUD funds described in the plan. ([Consolidated Plan Menu in IDIS](#))

The required data tables within the housing/homeless needs assessment and housing market analysis have been redesigned to match the data that HUD will provide to grantees from a newly expanded community development and affordable housing database. Tables in each grantee's individual template in IDIS will be automatically pre-populated with the required data. ([IDIS Tables Pre-populated with Data](#)) Presenting data in the format required for submission will save grantees time in preparing their Consolidated Plans, allowing for more focus on in-depth analysis and stakeholder consultation to design programs in response to community needs, as illustrated by the data.

In some cases, due to requirements of the regulations, the template requests data that cannot be provided by HUD. Examples include data describing special needs populations and data describing homelessness.

Following the needs assessment and market analysis sections of the Consolidated Plan, grantees must complete a 3-5 year strategic plan. The template for the strategic plan is designed such that priority needs and goals can be described in language that is meaningful to grantees and their stakeholders. Numeric goals are set with goal outcome indicators that are based on the measures already used to report accomplishments in IDIS, as described in HUD's 2006 Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs (<http://www.gpo.gov/fdsys/pkg/FR-2006-03-07/pdf/06-2174.pdf>). This standard set of goal outcome indicators allows goals to be tied to accomplishments reported in IDIS and will later be used to populate the CAPER/PER for simpler performance reporting.

To assist with comprehensive, place-based planning, HUD has included the following additional features in the template for Consolidated Plan submission:

- Format to describe geographic priorities and relate priority needs and goals to those areas to illustrate how funds are being allocated geographically within their communities ([Describe Geographic Priorities](#));

- Ability to present resources expected during the Plan period that will leverage HUD formula funds; and
- Discuss how priorities and goals in the Consolidated Plan are coordinated with other planning efforts within the grantee jurisdiction, region, or state. ([Coordinate with other planning efforts](#))

The template can be customized to grantees' unique needs by providing the option to add additional text, data, or images (including maps) throughout. ([Ability to add Maps/Data/Text](#))

Annual Action Plan

The Annual Action Plan template contains the elements required by the regulations specific to each type of grantee (local government/consortia or state).

Local Government Grantees: Local government grantees will provide information about proposed projects, including assigning each project to a goal described in the strategic plan and setting a numeric target for that program year. As with the current Annual Action Plan submission, grantees will also discuss program-specific requirements dependent on which of the formula grants they receive.

Upon HUD approval of the Annual Action Plan, IDIS will populate the existing project set-up screens with the data entered on proposed projects in the Annual Action Plan template. Grantees must reconcile expected funding amounts from the Annual Action Plan with actual amounts based on their allocation, if necessary, and then will be able to set up activities for funding. Incorporating Annual Action Plan submission into IDIS will reduce duplicative data entry by saving entitlement grantees the step of setting up projects to be funded in IDIS after they have described those projects in their Annual Action Plan.

States: Because state grantees are not required to propose specific projects for their grant allocations in the Annual Action Plan, the template is designed to give states the flexibility to describe a Method of Distribution (or multiple Methods of Distribution) as they currently do, while supplying HUD with a standard set of information that fulfills regulatory requirements. Like local government grantees, states will use goal outcome indicators to set numeric targets in their 3-5 year strategic plan. However, state grantees have indicated that it is difficult to set numeric outcome targets at the time the Annual Action Plan is submitted because they distribute formula funds to local governments, which administer individual projects and activities. Based on this feedback from state grantees, the Annual Action Plan template requires states to set targets for the percentage of each grant that they expect to use that year toward each Consolidated Plan goal. ([Allocation Priorities](#)) These one-year funding targets will provide state grantees a means of tracking how their programs are meeting the needs identified in the Consolidated Plan for local jurisdictions within the state. This does not change the current reporting requirements in IDIS for states as described in HUD's 2006 Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs.

CAPER/PER

The improvements to IDIS will also include an electronic submission of the CAPER/PER, which will streamline the information required and, where possible, automate the information collection for the CAPER/PER at the end of each program year.

The interim rule for the Emergency Solutions Grants program and Consolidated Plan conforming amendments (Interim Rule) made substantial changes to the reporting requirements for Emergency Solutions Grants program recipients. Collecting data on the program electronically will enable HUD to report nationally on recipient performance, identify trends, and more easily review recipients' data. Therefore, HUD is releasing limited screens for ESG recipients to submit with the CAPER, which will be required for all CAPERs submitted after October 1, 2012. HUD will update the screens to reflect new Homeless Management Information System (HMIS) data standards and further align the CAPER with the Continuum of Care Annual Performance Report. Recipients should use information from HMIS to complete as many of the screens as possible, and should use other sources where data are not collected in HMIS (such as the financial/expenditure screens). For jurisdictions that do not receive ESG funds, submission of the CAPER in IDIS will be required after the grantee has an approved Consolidated Plan or Annual Action Plan in IDIS. Note that the ESG screens in IDIS represent only a portion of the CAPER required to be submitted to HUD. HUD plans to issue additional guidance on reporting on homeless strategies and performance.

When grantees have an approved Consolidated Plan (including the Annual Action Plan) in IDIS, accomplishment data reported for completed activities (except ESG activities, since IDIS does not collect ESG accomplishment data) will roll up and can be compared against the numeric goals set in the strategic plan and assigned to projects in the Annual Action Plan. A report will be available in IDIS to allow grantees to access this information throughout the year to allow grantees to more easily monitor and assess progress toward their goals and demonstrate benefits from the expenditure of these federal funds.

3. IDIS ENHANCEMENTS

Currently, grantees submit a Consolidated Plan every 3-5 years and an Annual Action Plan and CAPER every year on paper forms. To simplify preparation, submission, administration and reporting for grantees, HUD has incorporated an electronic submission template into IDIS for the Consolidated Plan, Annual Action Plan and CAPER/PER. By automating these submissions, HUD estimates that duplicative data entry and manual processing will be reduced by as much as **230,000** grantee hours, based on a 30% reduction in estimated paperwork burden hours associated with the current forms.

Prompts will alert the user if they have missed a required field and system checks will notify users that the plan includes all required elements before submission.

Incorporating the Consolidated Plan into IDIS will create a connection between the Consolidated Plan goals and objectives and accomplishments that grantees now report as they draw down funds and complete activities. This will make the Consolidated Plan a more useful planning and program management tool by allowing grantees to track their progress toward their goals. It will help HUD staff to better partner with grantees by giving them improved information to assess specific technical assistance needs.

4. EXPANDED DATA AND A WEB-BASED GIS MAPPING TOOL FOR CONSOLIDATED PLANNING

HUD is expanding the data that it provides for consolidated planning. In addition to the Comprehensive Housing Affordability Strategy (CHAS) data currently provided to describe affordable housing needs, HUD will include 5-year American Community Survey (ACS) data from Census, characteristics of public housing residents, and data describing business and employment characteristics. This data will automatically populate tables in the Consolidated Plan for grantee use. While these data sets are needed to meet Consolidated Plan regulatory requirements, HUD has not provided them in one place until now. Datasets describe housing needs; demographic, racial and ethnic data; housing market conditions; economic market conditions; and, public housing development and characteristics of public housing residents. In the near future, HUD expects to also provide homelessness data collected by the Continuums of Care for each Consolidated Plan grantee jurisdiction.

To make the data that HUD provides easier for grantees to understand and manage, HUD developed a web-based GIS mapping tool, called CPD Maps (<http://egis.hud.gov/cpdmaps/>). CPD Maps is available to grantees and the public online without special software. The use of this tool is not required for Consolidated Plan submission, however, CPD Maps is designed to increase understanding of how needs and market conditions are distributed geographically within each jurisdiction and assist with needs- and market-based decision-making.

Special features include:

- Maps of CDBG and HOME activities that have been assigned addresses in IDIS, as well as property locations for other HUD programs (Note: certain data cannot be displayed to protect personal privacy and sensitive information, such as domestic violence shelters). ([Activity Data](#))
- A library of prepared maps and reports that can be exported as a spreadsheet. ([Library of Prepared Maps and Reports](#))
- The ability to draw custom geographies and to receive data reports associated with those geographies. ([Ability to Draw a Custom Geography](#))
- A query function that will return geographies (census tracts, counties, etc.) that meet user-specified conditions. ([Multivariate Query](#))

While CPD Maps is publicly available, the tool has additional functions for grantee users only. IDIS will allow grantee users preparing a Consolidated Plan or Annual Action Plan to save and upload maps and data to their plans to expand on the data provided in the template, highlight specific needs and or demonstrate conditions in a target area. This function will assist grantees to “tell their story” to both HUD and the public.

5. TRANSITION PLAN FOR SUBMITTING CONSOLIDATED PLANS ELECTRONICALLY VIA IDIS

Consolidated Plan enhancements will be complete on May 7, 2012. Grantees submitting Consolidated Plans on or after November 15, 2012 are required to use IDIS to submit these plans and all subsequent

Annual Action Plans. Grantees that are not required to submit a new Consolidated Plan will be permitted, but not required, to use IDIS to prepare and submit Annual Action Plans in the system beginning May 7, 2012. All jurisdictions may use IDIS to prepare and submit CAPERs in IDIS after May 7, 2012, but only after they have an approved Annual Action Plan in the system. However, ESG recipients are *required* to use the ESG portion of the CAPER template in IDIS beginning October 1, 2012. Grantees without an approved Annual Action Plan in IDIS will input information into the ESG section of the CAPER template in IDIS and print a report to attach to their paper CAPER submission.

New user permissions have been created in IDIS for Consolidated Plan preparation and submission. Consolidated Plan permissions are distinct from current fund-management related permissions in IDIS. Grantees should work with their CPD representatives to ensure that staff who will work on Consolidated Plan preparation in IDIS have the necessary permissions.

HUD has prepared users manuals for the Consolidated Plan in IDIS and CPD Maps. Additional training for grantees and HUD field staff will be made available to implement this notice. The user manuals as well as more information and training materials will be posted on the Con Plan website at <http://www.hud.gov/offices/cpd/about/conplan/index.cfm>.

Consolidated Plan and CPD Maps Screenshots

1. Consolidated Plan Menu In IDIS:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link1

2. IDIS Tables Pre-populated with Data:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link2

3. Describe Geographic Priorities:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link3

4. Coordinate with other planning efforts:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link4

5. Ability to add Maps/Data/Text:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link5

6. Allocation Priorities:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link6

7. Activity Data:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link7

8. Library of Prepared Maps and Reports:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link8

9. Ability to Draw a Custom Geography:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link9

10. Multivariate Query:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/consolidated_planning/conplan_notice_images/#Link10