

CHAPTER 12: IDIS 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). This chapter will not cover in detail all of the requirements of IDIS, but is meant to be a survey of various areas related to compliance and accurate reporting of accomplishments.

SECTION	TOPIC
12.1	Overview of IDIS
12.2	Data Entry
12.3	Reporting

12.1 Overview of IDIS

The Integrated Disbursement and Information System (IDIS) 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 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 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: Objectives of IDIS, Use of IDIS Throughout the Program Year

Other Reference Materials on This Topic: IDIS website:

<http://www.hud.gov/offices/cpd/systems/idis/index.cfm>, IDIS Reference Manual

<http://www.hud.gov/offices/cpd/systems/idis/library/refmanual/index.cfm>

12.1.1 Objectives of IDIS

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

First, it enables grantees to draw down CDBG funds.

Second IDIS is a data collection and reporting tool grantees use to record the results of CDBG-funded activities. IDIS is where all the data you collect on CDBG activities is reported to HUD, including the new CPD Performance Measurement data elements.

IDIS is the mechanism HUD uses to disburse grant funds to its CPD formula grantees. When a grantee is awarded a grant, the funds stay at the U.S. Treasury until the grantee is ready to expend the funds. When the grantee is ready to spend the grant funds, they use IDIS to request a drawdown of their funds. Once the request is processed, the funds are wire-transferred, or disbursed, to the grantee's bank account. It is important to note that IDIS is a reporting system

and not an accounting system. Local accounting systems must be used in addition to IDIS to ensure proper management of funds.

IDIS also provides grantees with a mechanism to describe the projects and activities that used CDBG funds. The information captured by IDIS helps demonstrate to HUD that the project 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 grantees use the system, the data is collected in a standard format that enables HUD to easily aggregate the data at a national level. IDIS collects, consolidates, and reports data on the results of CDBG-funded activities.

12.1.2 Use of IDIS 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 grantee will perform different tasks in IDIS. While the tasks listed below are not exclusive to any phase, this is the order they are usually encountered.

Start of the Program Year: At the beginning of each program year a grantee submits an Action Plan to HUD. The Action Plan contains a list of proposed projects that the grantee intends to undertake to meet the goals and objectives in their Strategic Plan. The grantee enters those projects in IDIS. Projects form the organizational framework of a grantee's IDIS information. Within the organizational framework of the projects, a grantee will provide more detailed data by adding IDIS activities.

Program Year – Implementation: Throughout the program year the grantee will incur expenses and use IDIS to request drawdowns from their grant funds to pay for these expenses. The grantee will also use IDIS to report the receipt and use of program income. The grantee's primary focus as IDIS users and/or program staff is to ensure that data is accurate and that accomplishments are reported at least once a year. However, it is strongly recommended that data is reported as frequently as possible. If a grantee 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 grantee will use IDIS to enter accomplishment data and performance measures and indicate which projects have been completed. Once the information is entered, the grantee can use IDIS to print out standardized reports that contain information that must be included in their annual report.

12.2 Data Entry

Grantees must enter data on the activity level in the following steps: setting up, funding, drawing, and completing/reporting accomplishment data. Consistency of reporting on IDIS 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: Data Entry, Key Data Fields, Common IDIS Errors to Avoid
Regulatory/Statutory Citations: 570.483

Other Reference Materials on This Topic: IDIS Reference Manual website:

<http://www.hud.gov/offices/cpd/systems/idis/library/refmanual/index.cfm>

Guide to Eligible Activities and National Objectives (entitlements and states) website:

<http://www.hud.gov/offices/cpd/communitydevelopment/library/>

Matrix Codes on IDIS website: <http://www.hud.gov/offices/cpd/systems/idis/training/cdbgxref.cfm>

Guidance for Reporting CDBG Accomplishments in IDIS:

<http://www.hud.gov/offices/cpd/communitydevelopment/cleanup/guidance>

12.2.1 Data Entry

Grantees must enter data on several different levels within IDIS.

Plan Year: In the Consolidated Plan process, a grantee must submit an annual Action Plan and an annual performance report (CAPER). It makes sense that the first level of data organization in IDIS is the plan year. The term plan year is interchangeable with the term program year. The grantee will not be able to enter any project data until the Plan Year has been created.

Projects: Once the plan year has been added, a grantee will add a new project in IDIS 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. This ensures that there is a parallel structure between the Action Plan, IDIS, and the CAPER reports that will be generated from IDIS. 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 is captured at the activity level.

Activities: To draw down funds and to capture detailed program related accomplishment data, a grantee will set up at least one activity under each project. Activities are the basic building block in IDIS. 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 IDIS activity. A project may have one or more activities.

Activity Funding: Once the basic data is entered for an IDIS activity, the grantee can commit CDBG funds to the activity. This commitment process ensures that a grantee 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.

Drawdowns: A drawdown is a request for payment against a grantee's line of credit. Grantees create a voucher in IDIS to draw down funds. Grantees draw funds as required to pay for work that has occurred for an IDIS activity. Once the grantee creates and approves a drawdown voucher in IDIS, HUD will process the voucher request and wire-transfer the requested amount to the grantee in two to three business days.

12.2.2 Key Data Fields

The combination of an IDIS activity's matrix code, national objective, and accomplishment type 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. A copy of this document is at the end of the chapter as Exhibit 12-1.

Matrix Codes

The matrix code indicates how the activity is eligible under CDBG regulations. It is an important data element that grantees must know at the beginning of the program year. The matrix code generally identifies the purpose for which assistance was provided and determines the type of accomplishment units that should be reported.

IDIS matrix code examples:

03A - Senior Centers

03C - Homeless Facilities (not operating costs)

14A - Rehab single unit residential

18C – Micro-enterprise assistance

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 are generally aggregated by matrix code. Therefore, grantees across the country must be consistent in uniformly applying matrix codes to activities.

Grantees should choose the most specific code that relates to the activity they are funding. Grantees 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 new code).

One of the most common errors in the use of matrix codes in IDIS 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 Performance Measurement 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.

Grantees should check with HUD if they are unsure about the choosing the most appropriate IDIS matrix code.

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 grantee's administrative cap, must meet a national objective. One of the key functions of IDIS is to demonstrate how the activity met a national objective. It is important to note that national objectives will require different types of data to demonstrate compliance. Therefore, the IDIS data collection screens will change depending on the national objective selected. Grantees 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 grantee's CDBG program expenditures must meet the LMI benefit national objective.

Report Year / Program Year

All accomplishment data reported in IDIS is assigned to a specific year. IDIS uses two terms, Report Year and Program Year, interchangeably throughout the screens; the two terms are synonymous.

It is up to the grantee to ensure that accomplishments are reported under the correct year. When adding a new CDBG activity to IDIS, the grantee should navigate through all of the activity screens and insert the current report year and program year where necessary. The table below lists the screens that utilize the Report Year / Program Year field. It is important to note that the table lists the screens that ***normally*** appear for the given national objective. The screens may be different based on the matrix code and accomplishment type selected.

LMI Area (LMA): C04MA04 – Accomplishments / Narrative, CDBG17 – Service / Facility Performance Measurement Indicators

LMI Limited Clientele (LMC): C04MA04 – Accomplishments / Narrative, CDBG08 – Race/Ethnicity Data, CDBG13 – Income Data, CDBG17 – Service / Facility Performance Measurement Indicators

LMI Mod Housing (LMH): C04MA04 – Accomplishments / Narrative, CDBG08 – Race/Ethnicity Data, CDBG13 – Income Data, CDBG22, CDBG23, CDBG24 – Owner Occupied Housing Indicators, CDBG18, CDBG19 – Renter Occupied Housing Indicators

LMI Jobs (LMJ): C04MA04 – Accomplishments / Narrative, CDBG08 – Race/Ethnicity Data, CDBG13 – Income Data, CDBG11 – Job Creation / Retention, CDBG26/CDBG27 – Creation/Retention Job Indicators, CDBG28, CDBG29 – Assistance to Businesses

For Entitlements, Slum Blight, Urgent Need, C04MA04—Accomplishments/Narrative, Appropriate Performance Measurement. Screens Dependent on Matrix Code and National Objective

For States, Slum Blight, Urgent Need C04MA04—Accomplishments/Narrative, CDBG08—

Race/Ethnicity Data, CDBG13—Income Data

Appropriate Performance Measurement Screens Dependent on Matrix Code and National Objective

It is important that information on accomplishments is reported consistently on all accomplishment screens for a given program year. For example, for an LMH activity, a grantee reporting one housing unit completed on the MA04 screen for PY 2006 must also report the following information for PY 2006: the race/ethnicity of the household occupying the housing unit on the CDBG08, the income level of the household on the CDBG13, and the performance measurement indicators for the housing unit on the appropriate performance measurement screens.

For IDIS activities that span more than one program year, it is essential that grantees insert new program years as needed to correctly separate accomplishments by year. On the screen that collects the Narrative (C04MA04), the grantee can use the F11 function key to create a new copy of the screen for the new program year. On the additional screens that collect accomplishment and beneficiary data, the grantee can use the "Insert/Delete Program Year" field to create new copies of the screen for additional program years.

The diagram illustrates the process of inserting a new program year into the CDBG13 screen. It shows two screenshots of the 'BENEFICIARY INCOME LEVELS' screen for CDBG13.

Top Screenshot (Initial Setup):

BENEFICIARY INCOME LEVELS		CDBG13	
Totals for program year: 2007			
Income Level	Total	All	Yrs
Extremely Low	11	11	
Low	—	—	
Moderate	—	—	
Non-Low Moderate	—	—	
Total	11	11	

Insert/Delete program year(I/D)? 2

Bottom Screenshot (Second Program Year):

BENEFICIARY INCOME LEVELS		CDBG13	
Totals for program year: _____			
Income Level	Total	All	Yrs
Extremely Low	—	11	
Low	—	—	
Moderate	—	—	
Non-Low Moderate	—	—	
Total	—	11	

Insert/Delete program year(I/D)? _

Callout Boxes:

- During initial activity setup, insert the current year.
- If the activity extends to a second program year, use the Insert function to create a new copy of the screen for a second program year.

12.2.3 Common IDIS Errors to Avoid

HUD has published guidance for grantees 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. This document, Guidance for Improving the Quality of CDBG Accomplishment Data in IDIS, may be found at the end of this chapter.

In general, grantees should avoid the following common IDIS 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 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. Grantees 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 the CDBG02, Funding Sources screen. The CDBG amount on this screen is a protected field. Several grantees, 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 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 persons and households. Report income level data in the appropriate categories, including extremely low, low, moderate, and non-low/moderate on the CDBG13 screen.

Income level data for presumed benefit activities is missing. The CDBG13 screen (CDBG Beneficiary Income Levels) must be completed for presumed benefit activities, even though grantees 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.

However, if a grantee believes that another income level is more appropriate for any presumed benefit group in their community, the grantee should use that income category, rather than those 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, grantees 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.

Grantees 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.

12.3 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 IDIS Reports, Grantee Reports

Regulatory/Statutory Citations: 570.503

Other Reference Materials on This Topic Guidance on Reporting CDBG Accomplishments in IDIS/Sample Accomplishment Reports,

<http://www.hud.gov/offices/cpd/communitydevelopment/cleanup/guidance/>,

<http://www.hud.gov/offices/cpd/communitydevelopment/library/accomplishments/>, CDBG Performance Profiles,

<http://www.hud.gov/offices/cpd/communitydevelopment/library/performanceprofiles/>, CDBG Data Clean up Spreadsheets, <http://www.hud.gov/offices/cpd/communitydevelopment/cleanup/>

12.3.1 IDIS Reports

Grantees can run a variety of reports in IDIS to ensure data is accurate and complete for their activities. One relatively new tool is called BOSMAC which has made downloading reports much easier. BOSMAC uses macros (e.g., mini programs) so grantees could download IDIS reports in Word, for the majority of the reports, and Excel, for a few reports.

Grantees should review the following key CDBG reports at least annually and more often as possible. Please note the first four may also be used for the CAPER submission.

The PR03: Grantee Performance Report provides comprehensive information about each CDBG activity which was open and had draws during a program year.

The PR06: Summary of Consolidated Plan Projects for Program Year #### tracks progress in implementing projects identified in the action plan.

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.

The PR26: CDBG Financial Summary Report provides information on the CDBG resources available and expenditures incurred for a specified program year. The expenditures are summarized to determine the percent expended for LMI, planning/ administration, and public service activities.

In addition there are new performance measurement reports now available within IDIS.

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.

12.3.2 Additional Grantee Reports on the Web

In addition to reports that the grantee can download from IDIS, there are several reports that are available on the HUD website. It is important that all accomplishment data is entered in IDIS and that all data is accurate because these reports reflect the progress of your local CDBG program, are used by various government entities to evaluate the effectiveness of the CDBG program, and are on the web for all to see.

The first of these are Performance Profiles. These profiles significantly increase the amount of information that is available about the performance of CDBG grantees. The data available in this report helps ensure accountability and assist in assessing the progress of each grantee's program. These profiles also assist grantees in measuring their contributions toward meeting the housing and community developments needs of LMI persons in their communities and in analyzing the effectiveness and efficiency of their program.

The profiles include the following information for each grantee by program year: available program funds, including program income, expenditures by major eligible activity categories, timeliness ratio for entitlement communities, information on program targeting, including the use of NRSAs and CDFIs, and information on activities that provide direct benefits to individuals.

Information on expenditures is provided both numerically on the left hand side of the page as well as in a pie chart on the right hand side of the page.

The second page of this report covers the following additional pieces of information: the number of beneficiaries served by race/ethnicity group, number of beneficiaries by income level, and accomplishments achieved during the program year.

Information on the number of beneficiaries by income level is provided numerically on the left hand side of the page as well as in a bar chart on the right hand side of the page.

The second example is Expenditure Reports. The CDBG Program has developed reports that show how each grantee expended CDBG funds during its most recently completed program year. These reports provide information on grantee expenditures by the type of activity carried out. Since CDBG funds may be used for a wide variety of housing, community and economic development activities, the use of those funds may be identified in these profiles by as many as

90 different categories or matrix codes depending on how a grantee has chosen to use its funds to meet local needs.

Another of the reports appearing on the web are the Selected CDBG Accomplishment Reports. These reports display accomplishments for selected housing, economic development, public improvement, and public service activities for each grantee by program year.

All of these reports ensure that the most up-to-date information is available to grantees, their clients, and public officials seeking specific information on CDBG accomplishments and performance. HUD uses these reports and other IDIS data to provide information to the many entities that review and evaluate the CDBG program including Congress, the General Accounting Office, the Office of Management and Budget, and the Inspector General. Data from IDIS is also aggregated nationally to demonstrate the effectiveness of the CDBG program in meeting HUD goals and strategies. Exhibit 12-1: 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>

Problem	Solution
	<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> <p>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.</p> <p>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).</p> <p>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 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> <p>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</p>

Problem	Solution
	<p>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.</p> <p>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.)</p>
<p>Missing or inaccurate leveraged funds data</p>	<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 persons and households.</p>	<p>Report income level data in the appropriate categories (extremely low, low, moderate, and non-low/moderate) on the CDBG13 screen.</p>

<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> <p>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.</p> <p>Do not report the same jobs in multiple program years.</p> <p>Report only the number of jobs created/retained; do not report on the LMI population or the total population of a jurisdiction.</p>
<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 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>
<p>Activity name and address/location data on the MA01 screen</p>	<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>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>

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.

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

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>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, <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, use the field on the MA04 for the activity tracking the activity delivery costs to indicate that accomplishments are reported under another activity.)</p>