

## Chapter 3: Implementing the CPD Outcome Performance Measurement System

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*In order to effectively implement the CPD Outcome Performance Measurement System, grantees need to integrate the components of the System into their local procedures. This chapter will highlight topics such as:*

- 1) The key steps in implementing the CPD Outcome Performance Measurement System;*
- 2) Integrating outcome measures into the Consolidated Plan, including the Strategic Plan and Action Plan;*
- 3) Partner outreach and training; and*
- 4) Data collection timing and tips.*

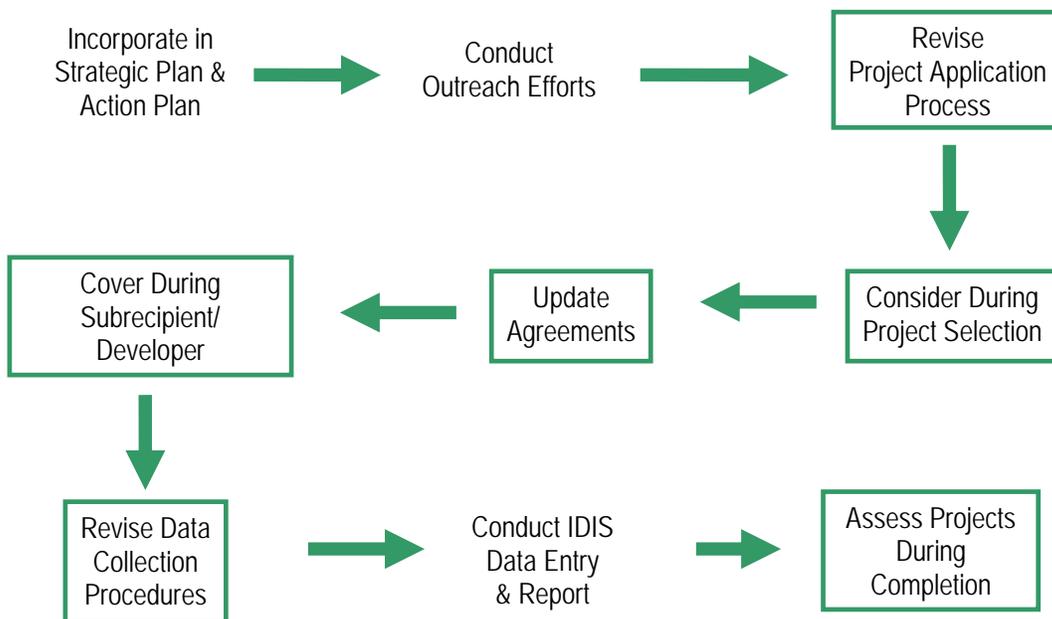
### KEY STEPS IN IMPLEMENTING THE OUTCOME PERFORMANCE MEASUREMENT SYSTEM

In order to implement the CPD Outcome Performance Measurement System, a grantee will need to consider how its local systems and procedures can ensure that the proper data is collected in a timely and complete manner.

- ❑ It is important that grantees act quickly to get the measures integrated. This is both because it is important to begin the process of “telling the story” about these key community development programs and because it is also important to “road test” the Federal, state, and local data systems and ensure that these systems will effectively collect outcome data and report on results.
  - Grantees are strongly encouraged to begin entering outcome data into IDIS during FY06.
  - Grantees are **required** to enter outcome data for all CDBG, HOME, HOPWA, and ESG activities beginning on October 1, 2006 (FY07).
  - This data entry requirement covers not only the selected objectives and outcomes, but also the indicator data for each activity. As noted in Chapter 2, grantees must enter **all** indicator data that is applicable to the chosen activity type. Grantees cannot elect to enter only partial indicator data. The IDIS screens will guide the grantee through this process, depending on the selected activity type and for CDBG, the matrix code and national objective.
- ❑ The required performance measurement data entry in FY07 will be timed to match the Phase I release of the updated IDIS System.
  - In FY07, grantees will need to enter outcome data on any open project, regardless of when it was set up in IDIS.

- So, grantees should amend their data collection instruments and agreements with existing subrecipients, state recipients, developers, CHDOs, assisted businesses, and other key parties to ensure that the necessary data is gathered.

The integration of the CPD Outcome Performance Measurement System is likely to require the grantee to take a comprehensive look at all of its data collection tools and processes at each stage of the process for selecting and completing activities. The chart below highlights the typical stages of undertaking an activity and the areas where the performance measures will need to be integrated:



- During the consolidated planning process, the grantee will be required to list its intended outcomes and objectives in both the Strategic Plan and the Action Plan.
- Once the Consolidated Plan is updated, the grantee needs to share the new requirements and intended outcomes with key partners.
- The grantee then needs to update its application materials or process to either collect the proposed outcome data from the partner or to enable the grantee staff to have enough data so that it can make this determination.
- Once applications are received, the grantee needs to determine to what extent it will consider the proposed outcomes in its project selection process.
- After projects are selected and ready to begin, the grantee needs to ensure that its funding agreement with the partner includes language requiring that the outcome data be collected and reported.
- If the grantee conducts any implementation training for its subrecipients and other partners, the performance measurement system should be discussed.

- ❑ Once the project begins, the grantee needs to ensure that its partners have effective data collection tools that readily allow for the complete collection of the needed indicator data.
- ❑ Once the data is reported by the partner to the grantee, the grantee needs a process for including that data in its IDIS data entry procedures.
- ❑ Finally, the grantee needs to report on its annual outcomes as a part of its CAPER or PER. The grantee may also wish to use this data to conduct a self assessment of its program performance.

The following sections of this chapter provide additional information and suggestions on the key topics identified above.

## THE CONSOLIDATED PLAN

The Consolidated Plan (Con Plan) serves as both an application for Federal funds and a summary of the activities planned by a given grantee. The Con Plan has two components: (1) a complete Consolidated Plan that covers a three-to-five year period and identifies the grantee's overall program goals (inclusive of a Strategic Plan), and (2) an Action Plan which specifically indicates the activities planned by the grantee to occur in the following 12-month program year.

- ❑ The Con Plan is due no less than 45 days prior to the start of the grantee's program year. Due to the timing of the annual appropriation and the Federal fiscal year, HUD does not accept plans between August 15 and November 15.
- ❑ The grantee determines the exact timeframe for the Three to Five Year Consolidated Plan (also known as a Complete Consolidated Plan), including the Strategic Plan.
- ❑ The Action Plan is an annual and detailed description indicating which specific components of the Three to Five Year Consolidated Plan will be undertaken in the subsequent 12 month program year.
- ❑ For local grantees, the Action Plan is not focused on the source year of the funding, but rather on the specific activities a grantee intends to fund in the coming program year. For example, assume that a grantee has \$1,200,000 of CDBG funds in its line of credit and it will receive another \$800,000 in FY07. Of this \$2,000,000, the grantee plans to spend \$1,100,000 during FY07. The FY07 Annual Action Plan will cover all of the programs that will be undertaken in FY07 using the \$1,100,000.
- ❑ For state grantees, the Action Plan specifies a method of distributing funds, rather than focusing on annual activities. For example, the state's 2006 Action Plan describes how the state will distribute its 2006 funding (plus program income and reallocated funds). The state might not finish distributing those funds until after the 6/30/06 end of their 2006 program year, but it would still be included in the 2006 Method of Distribution. Any 2005 money that the state still has to distribute after 7/1/06 is still part of the 2005 program year Action Plan, not the 2006 Action Plan.

On February 9, 2006 and effective March 13, 2006, HUD published the *Consolidated Plan Revisions and Updates: Final Rule*. The new regulation may be found at: [www.HUD.gov/offices/cpd/about/conplan/finalrule.pdf](http://www.HUD.gov/offices/cpd/about/conplan/finalrule.pdf).

This Final Rule clarified a number of key Con Plan issues, perhaps most importantly how the CPD Outcome Performance Measurement System will be integrated into the Three to Five Year Consolidated Plan and the Annual Action Plan. A summary of key Con Plan regulatory changes includes the following additions to the Con Plan requirements (Note: this summary is not all inclusive and grantees must refer to the regulation for a complete explanation of the Con Plan changes):

- Certain definitions were updated;
- A suggestion for grantees to explore alternative public involvement techniques;
- A requirement for consultation with agencies that offer fair housing services, as well as with faith-based organizations;
- A requirement for an executive summary;
- Requirements to state the rationale for funding allocation priorities and to summarize needs;
- A requirement to indicate proposed accomplishments and outcomes by objective;
- A requirement to indicate the outputs and outcomes for Neighborhood Revitalization Strategies;
- A requirement in the homeless strategy to address the needs of the chronically homeless;
- A requirement to indicate other resources that will be used to leverage the CPD funds;
- A requirement to include a summary of annual objectives the grantee expects to achieve during the program year;
- A requirement to identify outcome measures for activities included in the Action Plan per the CPD Performance Measurement Notice;
- A requirement to specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing funds;
- A section on actions to address the needs of public housing;
- A HOPWA requirement to indicate the method of selecting sponsors and activities for TBRA and short-term assistance to prevent homelessness; and
- A certification on the grantee's policy on discharge of persons from publicly funded institutions.

As is clear from the list above, a significant number of the Consolidated Plan updates involved incorporating the CPD Outcome Performance Measurement System and other requirements for identifying specific program objectives. Since the Con Plan Final Rule was effective on March 13, 2006, so too were the performance measurement requirements related to the Con Plan.

- For FY 2006, if a grantee is submitting only an Action Plan after March 13, 2006, the Action Plan must comply with the new Consolidated Plan regulations. Grantees that submitted Action Plans after March 13 have 90 days to amend their Action Plan to address new provisions of the Final Rule.

- For FY 2006, the Three to Five Year Plan must comply only if the grantee is submitting a Five Year Consolidated Plan after March 13, 2006.
- However, in FY07, the outcome measures must be incorporated in all plans. This includes the FY07 Action Plan and any new Three to Five Year Consolidated Plan. For any existing, open Three to Five Year Plan in FY07, the grantee must update that plan to include the performance measures. This is not deemed to be a substantial amendment unless new activities are added or there are other major changes in the grantee's programs.
- For FY08 and forward, all Strategic Plans and Annual Action Plans must incorporate the CPD outcomes measures.
- The chart below summarizes the Con Plan and CAPER due dates.

**Con Plan Due Date Summary**

FY06: Any plan submitted after 3/13/06 must include outcomes.

FY07: All 3-5 Year Plans and all Action Plans must include outcomes.

<b>Program Year Start Date</b>	<b>Consolidated Plan/Action Due Date</b>	<b>All plans required to include outcomes and objectives</b>	<b>CAPER/PER due date</b>	<b>CAPERs required to include objectives, outcomes and to compare results</b>
July 1, 2005	May 15, 2005	<b>NO</b>	September 28, <b>2006</b>	<b>NO</b>
January 1, <b>2006</b> February 1, <b>2006</b> March 1, <b>2006</b> April 1, <b>2006</b>	November 15, 2005 December 15, 2005 January 15, 2006 February 15, 2006	<b>NO</b> - but amendment to existing 3-5 Year ConPlan must be done in FY 2007	April 1, 2007 May 1, 2007 May 29, 2007 June 29, 2007	<b>YES</b>
May 1, <b>2006</b> June 1, <b>2006</b> July 1, <b>2006</b> August 1, <b>2006</b> Sept. 1, <b>2006</b> Oct.1, <b>2006</b>	March 15, 2006 April 15, 2006 May 15, 2006 June 15, 2006 July 15, 2006 August 15, 2006	<b>YES</b> -If objectives and outcomes are not included in annual plan or new consolidated plan submissions, grantees will have 90 days to amend such plans to include objectives and outcomes.  Amendments to any to existing 3-5 Year ConPlans must be done in FY 2007	July 29, 2007 August 29, 2007 Sept, 28, 2007 Oct. 29, 2007 Nov. 29, 2007 Dec. 29, 2007	<b>YES</b>
All plans for <b>FY2007</b>		<b>YES</b>		<b>YES</b>

- For more information on the revised Consolidated Plan requirements, please go to the HUD website at: <http://www.hud.gov/offices/cpd/about/conplan/>

## Overview of Outcome Measures in the Con Plan

There are two general ways in which the outcome performance measurement system is incorporated into the Con Plan. In both the Three to Five Year Plan and the Action Plan, the grantee is required to identify the overall CPD system objectives and outcomes it intends to achieve through all of its programs. Second, in the Action Plan, the grantee is required to identify the specific outcomes and performance indicators that will be achieved through each of its planned activities.

As noted above, the outcome measures must be incorporated into any plan submitted after March 13, 2006. If a grantee has submitted a plan after that date and did not include the outcome measures, the grantee has 90 days from the date of the plan submission to amend that plan and include outcome measures.

Because these Con Plan changes will not typically constitute a substantial amendment, the grantee is not required to undergo the public comment process on these changes or to submit the edits to HUD, although they may wish to do so. 24 CFR 91.505 deals with amendments and substantial amendments. 24 CFR 91.505(c) says the jurisdiction must make the amendment public and must notify HUD that an amendment has been made. A jurisdiction may submit a copy of each amendment to HUD as it occurs, or at the end of the program year. The grantee should also include a copy of these changes in its local files so that the information can be used by grantee staff when completing the FY07 CAPER and so that during on-site monitoring of the grantee, HUD can verify that the amendments were made.

A grantee that needs to incorporate the outcome measures into an existing plan has two possible options:

- The grantee can add text to its applicable existing program or project description narrative and/or add a column to existing tables, listing the intended outcome and objective of the planned activities and projects; or
- The grantee can edit its narrative as applicable and re-do its tables using the new table templates provided by HUD.

Each of these options, as well as a summary of the new Con Plan instructions is provided below.

### Amending Existing Consolidated Plans

One option for complying with the new outcome performance measurement requirement is to amend the grantee's existing plan to simply add the CPD system objectives, outcomes, and performance indicators. The grantee can add the outcomes, objectives and indicators to either the narrative and/or the existing Three to Five Year Plan and the Action Plan tables. The previous HUD templates for tables 1C, 2C, 3A, and 3C did not include the CPD Outcome Performance Measurement System. So, in order to incorporate the outcome measures, a column is inserted to collect the chosen objective and outcome for each planned activity.

Below is an example of the “old” version of the Three to Five Year Plan Table 1C with a column added (shaded) to incorporate outcome measures.

**Table 1C  
Summary of Homeless and Special Needs Objectives**

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	<u>Homeless Objectives</u>					
	<u>Special Needs Objectives</u>					
	<u>Other Objectives</u>					

In this new column the grantee would indicate the CPD system objective (decent housing, suitable living environment, economic opportunities) and outcome (availability/ accessibility, affordability, sustainability).

In this existing column, the grantee can use local performance indicators but it is recommended to also use the applicable ones from the CPD system.

In this existing column, the grantee should assign a unique local number to each objective it has identified.

Similarly, below is a sample of “old” Three to Five Year Plan Table 2C with a new shaded column added at the right to incorporate the outcome measures.

**Table 2C  
Summary of Specific Housing/Community Development Objectives**

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/ Objective*
	Rental Owners					
	Owner Housing					
	Community Development					
	Infrastructure					
	Public Facilities					
	Public Services					
	Economic Development					
	Neighborhood Revitalization/Other					

Finally, below is a sample of “old” Table 3A from the Action Plan with a new shaded column added at the right to incorporate the outcome measures. For local grantees, similar amendments should be made to Table 3C, the listing of projects.

**Table 3A  
Summary of Specific Annual Objectives**

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number	Actual Number	Outcome/Objective*
	Rental Owners					
	Owner Housing					
	Homeless Housing					
	Special Needs Housing					
	Community Development					
	Infrastructure					
	Public Facilities					
	Public Services					
	Economic Development					
	Neighborhood Revitalization/Other					

In identifying the outcome/objective, HUD has developed a numbering system that ties to the CPD Performance Measurement System. The outcome/objective numbers are as follows:

	Availability/Accessibility	Affordability	Sustainability
<b>Decent Housing</b>	DH-1	DH-2	DH-3
<b>Suitable Living Environment</b>	SL-1	SL-2	SL-3
<b>Economic Opportunity</b>	EO-1	EO-2	EO-3

Grantees are encouraged to use this numbering system throughout the Three to Five Year Consolidated Plan and the Action Plan when selecting and identifying intended outcomes and objectives (for example, the shaded column at the far right above).

### **The Revised Consolidated Plan Instructions and Forms**

In order to assist grantees in implementing the March 2006 Con Plan regulations, HUD has published guidelines with instructions and new sample tables. The local grantee Con Plan guidelines were published in May 2006. The state grantee guidance was published in June 2006. Grantees can access the state and the local guidance on the HUD website at:

<http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/guidance/>

The revised Consolidated Plan templates outlined in HUD’s local and state instructions incorporate the performance measures throughout the Three to Five Year Consolidated Plan and the Annual Action Plan. There are common requirements across the four CPD formula grant programs (CDBG, HOME, ESG, HOPWA) and there is required content

that is individual to each program type. The following sections indicate the required Con Plan Submissions – including text and suggested tables – by type of grantee (state or local).

### **The Local Grantee Consolidated Plan**

As noted above, local grantees are required to submit both a Three to Five Year Plan and an Annual Action Plan. Grantees will accomplish these tasks through both narrative and numeric information.

- HUD provides sample tables that are intended to assist the grantee in providing the needed information. If a grantee wishes to develop a table that contains the same information but in a different format, it is free to do so.
- The table formats are optional except for Homeless and Special Needs Populations Table 1A and Priority Housing Needs Table 2A, which are required.

### ***Local Grantee Three to Five Year Plan***

The Three to Five Year Consolidated Plan is intended to set the agenda for the grantee's community development activities. Every local grantee Three to Five Year Consolidated Plan must include the following information (Note: this is a summary of the requirements and local grantees are encouraged to read the local grantee Con Plan guidance for more details):

- Identification of the lead agency;
- The Con Plan process and consultations;
- The institutional structure that will be used to carry out activities and the strengths and gaps in that system;
- Executive summary of the intended outcomes and an evaluation of past performance;
- The citizen participation process; and
- The Strategic Plan, including:
  - *The time period for the plan:* The grantee must indicate which years are covered by the plan;
  - *Priority needs analysis and strategies:* The grantee must evaluate community development needs of various types (homeless housing, special needs, affordable housing, community development) and indicate how it intends to address those needs; and
  - *Specific objectives:* The grantee must also indicate the intended results of its planned activities over the three- to five-year period.

The following sections highlight the specific local grantee Three to Five Year Consolidated Plan requirements that are required for each activity type. As noted above, grantees are encouraged to review the details in the Final Rule and on the HUD website.

### ***Local Grantee Homeless Programs***

All grantees – even those who do not have a Continuum of Care – are required to submit information about the needs and programs for homeless persons in their jurisdiction. The required narrative sections include:

- A description of the homeless needs (which can be described on Table 1A);
- Priority homeless needs (which can be described in Table 1A);
- A summary of existing facilities to assist homeless persons (which can be described in Table 1A);
- Summary of the homeless strategy;
- The grantee's specific objectives related to addressing homelessness (which can be described on table 1C); and
- HUD also suggests that the grantee: standardize the Con Plan and the Continuum of Care; develop a strategy for addressing the needs of various subpopulations of homeless persons; create an approach for addressing chronic homelessness; and develop a description of how it is implementing a discharge coordination policy.

In addition, there are several tables that grantees can use to describe their homeless programs. As noted above, these exact tables (except Table 1A and 2A) are not required but the information must be submitted.

Table 1A describes the needs of homeless and special needs populations.

**Table 1A Homeless and Special Needs Populations**

Continuum of Care: Housing Gap Analysis Chart

		Current Inventory	Under Development	Unmet Need/ Gap
Individuals				
Example	Emergency Shelter	100	40	26
Beds	Emergency Shelter			
	Transitional Housing			
	Permanent Supportive Housing			
	Total			
Persons in Families With Children				
Beds	Emergency Shelter			
	Transitional Housing			
	Permanent Supportive Housing			
	Total			

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):				
1. Number of Persons in Families with Children				
2. Number of Single Individuals and Persons in Households without children				
(Add Lines Numbered 1 & 2 Total Persons)				
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless				
b. Seriously Mentally Ill				
c. Chronic Substance Abuse				
d. Veterans				
e. Persons with HIV/AIDS				
f. Victims of Domestic Violence				
g. Unaccompanied Youth (Under 18)				

**Table 1A Optional Continuum of Care Homeless Housing Activity Chart:**

Fundamental Components in CoC System - Housing Inventory Chart											
EMERGENCY SHELTER											
Provider Name	Facility Name	HMIS	Geo Code	Target Population		2004 Year-Round Units/Beds			2004 All Beds		
				A	B	Family Units	Family Beds	Individual Beds	Year-Round	Seasonal	Overflow/Voucher
Current Inventory											
SUBTOTAL											
Under Development											
SUBTOTAL											
TRANSITIONAL HOUSING											
Provider Name	Facility Name	HMIS	Geo Code	Target Population		2004 Year-Round Units/Beds			2004 All Beds		
				A	B	Family Units	Family Beds	Individual Beds	Total Beds	Seasonal	Overflow/Voucher
Current Inventory											
SUBTOTAL											
Under Development											
SUBTOTAL											
PERMANENT SUPPORTIVE HOUSING											
Provider Name	Facility Name	HMIS	Geo Code	Target Population		2004 Year-Round Units/Beds			2004 All Beds		
				A	B	Family Units	Family Beds	Individual Beds	Total Beds	Seasonal	Overflow/Voucher
Current Inventory											
SUBTOTAL											
Under Development											
SUBTOTAL											

- ❑ Table 1C can highlight the grantee's intended outcomes as they relate to homeless and special needs programs.

It is recommended that these indicators be the same as the CPD system – Grantees can use additional indicators as locally needed.

This outcome/objective number relates to the numbers for the nine different types of outcome statements (see chart above).

The grantee should add as many subsidiary outcome/objective numbers as is needed, given the grantee's program types. For example, the grantee could have DH 3.1, DH

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
DH-1.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>DH-2 Affordability of Decent Housing</b>							
DH-2.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>DH-3 Sustainability of Decent Housing</b>							
DH-3.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							

The Specific Objectives are intended to be the specific outcomes to be achieved by the program. Grantees can elect to develop their own specific objectives but they will still need to report on the CPD system outcomes, objectives and indicators in IDIS and the CAPER. The grantee can also simply use one or more of the outcome statements from the CPD system and add any context for the grantee's program (see the example for Table 2C below).

### Local Grantee Non-Homeless Special Needs

This section covers the needs of persons with a range of special needs, including persons with AIDS. The grantee must describe:

- ❑ Number of non-homeless special needs persons (can be Table 1B). For grantees with HOPWA funds, the grantee must describe the size and characteristics of the population with HIV/AIDS and their families that will be served;
- ❑ Available facilities and services;
- ❑ Priority needs of special needs populations (can use Table 1B); and
- ❑ Specific objectives (grantees can use Table 1C).

As noted above, for special needs non-homeless activities, the grantee can fill out Table 1C (see above) and Table 1B.

**Table 1B**

<b>SPECIAL NEEDS SUBPOPULATIONS</b>	<b>Priority Need Level High, Medium, Low, No Such Need</b>	<b>Unmet Need</b>	<b>Dollars to Address Unmet Need</b>	<b>Multi- Year Goals</b>	<b>Annual Goals</b>
Elderly					
Frail Elderly					
Severe Mental Illness					
Developmentally Disabled					
Physically Disabled					
Persons w/ Alcohol/Other Drug Addictions					
Persons w/HIV/AIDS					
Victims of Domestic Violence					
Other					
<b>TOTAL</b>					

***Local Grantee Housing***

This section of the Three to Five Year Consolidated Plan covers the anticipated housing programs for the grantee. The grantee must describe:

- Summary of housing needs (Table 2A), including an assessment of disproportionate need;
- Summary of priority housing needs and activities (Table 2A);
- Market analysis;
- Specific housing objectives (can be Table 2C);
- Needs of public housing and a public housing strategy;
- Lead based paint needs;
- Barriers to affordable housing;
- Fair housing;
- Antipoverty strategy; and
- Monitoring.

As noted above, for housing activities, the grantee must fill out Table 2A as follows:

**Table 2A  
Priority Housing Needs/Investment Plan Table**

PRIORITY HOUSING NEEDS (households)		Priority	Unmet Need	MultiYr Goals	Annual Goals
Renter	Small Related	0-30%			
		31-50%			
		51-80%			
	Large Related	0-30%			
		31-50%			
		51-80%			
	Elderly	0-30%			
		31-50%			
		51-80%			
	All Other	0-30%			
		31-50%			
		51-80%			
Owner	0-30%				
	31-50%				
	51-80%				
Special Needs	0-80%				
Total Goals					
Total 215 Goals					
Total 215 Renter Goals					
Total 215 Owner Goals					

**Table 2A (continued)  
PRIORITY HOUSING ACTIVITIES**

PRIORITY HOUSING ACTIVITIES	Priority	Multi-Yr Goals	Annual Goals
<b>CDBG</b>			
Acquisition of existing rental units			
Production of new rental units			
Rehabilitation of existing rental units			
Rental assistance			
Acquisition of existing owner units			
Production of new owner units			
Rehabilitation of existing owner units			
Homeownership assistance			
<b>HOME</b>			
Acquisition of existing rental units			
Production of new rental units			
Rehabilitation of existing rental units			
Rental assistance			
Acquisition of existing owner units			
Production of new owner units			
Rehabilitation of existing owner units			
Homeownership assistance			
<b>HOPWA</b>			
Rental assistance			
Short term rent/mortgage utility payments			
Facility based housing development			
Facility based housing operations			
Supportive services			
<b>Other</b>			

Grantees can also fill out Table 2C to indicate intended program objectives:

**Table 2C**

Specific Obj. #	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
DH-1.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>DH-2 Affordability of Decent Housing</b>							
DH-2.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>DH-3 Sustainability of Decent Housing</b>							
DH-3.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							

In filling out this table, grantees can follow the same instructions as Table 1C above. See below for a completed example of this table.

Below is an example of how a grantee might fill out Table 2C. Assume that this grantee runs four types of programs: A homeowner rehabilitation program for very low-income elderly households; a homebuyer program that provides downpayment assistance; a public services program that offers an after school gang prevention counseling; and an economic development program that assists high tech start-up firms.

Specific Obj. #	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
DH-2.1	Address the need for affordable decent housing by offering rehabilitation assistance to very low income elderly households	CDBG	<ul style="list-style-type: none"> <li>■ Number of units occupied by very-low income elderly</li> <li>■ Number brought to standard</li> <li>■ Number qualified as Energy Star</li> <li>■ Number of units made accessible</li> </ul>	2005	10		
				2006	20		
		HOME		2007	30		
		2008		30			
		2009		30			
<b>MULTI-YEAR GOAL</b>					<b>120</b>		
DH-2.2	Address the need for affordable decent housing by offering downpayment assistance to low income households	HOME	<ul style="list-style-type: none"> <li>■ Number of low-income households assisted</li> <li>■ Number of first time homebuyers</li> <li>■ Number receiving counseling</li> <li>■ Number receiving downpayment/closing costs</li> </ul>	2005	10		
				2006	50		
				2007	50		
				2008	50		
				2009	10		
<b>MULTI-YEAR GOAL</b>					<b>170</b>		
<b>SL-3 Sustainability of Suitable Living Environment</b>							
SL-3.1	Improve the sustainability of the suitable living environment by reducing gang-related crime through counseling programs	CDBG	<ul style="list-style-type: none"> <li>■ Number of households assisted</li> <li>■ Number of persons with new access to a service</li> </ul>	2005	10		
				2006	100		
				2007	100		
				2008	100		
				2009	100		
<b>MULTI-YEAR GOAL</b>					<b>410</b>		
<b>EO-1 Availability/Accessibility of Economic Opportunity</b>							
EO-1.1	Enhance the accessibility of economic opportunity and promote job creation by assisting new high tech businesses to be created	CDBG	<ul style="list-style-type: none"> <li>■ Total number of jobs</li> <li>■ Employer sponsored health care</li> <li>■ New businesses assisted</li> </ul>	2005	10		
				2006	50		
				2007	50		
				2008	50		
				2009	50		
<b>MULTI-YEAR GOAL</b>					<b>210</b>		

## Local Grantee Community Development

This section of the Three to Five Year Plan covers the anticipated community development programs for the local grantee. The grantee must describe:

- Non-housing community development needs (can be Table 2B);
- Specific long-term and short-term community development objectives (can be Table 2C); and
- HUD recommends that grantees may also wish to write about: their strategic vision for change; barriers to affordable housing; Neighborhood Revitalization Strategy Areas; specific housing objectives; benchmarks; revitalizing public housing and resident programs; mapping data; metropolitan/regional connections; and needs of special populations.

As noted above, the grantee can fill out Table 2C as well as Table 2B as follows:

**Table 2B**

<i>PRIORITY COMMUNITY DEVELOPMENT NEEDS</i>	<i>Priority Need Level High, Medium, Low, No Such Need</i>	<i>Unmet Priority Need</i>	<i>Dollars to Address Unmet Priority Need</i>	<i>Multi-Year Goals</i>	<i>Annual Goals</i>
<i>PUBLIC FACILITY NEEDS (projects)</i>					
<i>Senior Centers</i>					
<i>Handicapped Centers</i>					
<i>Homeless Facilities</i>					
<i>Youth Centers</i>					
<i>Child Care Centers</i>					
<i>Health Facilities</i>					
<i>Neighborhood Facilities</i>					
<i>Parks and/or Recreation Facilities</i>					
<i>Parking Facilities</i>					
<i>Non-Residential Historic Preservation</i>					
<i>Other Public Facility Needs</i>					
<i>INFRASTRUCTURE (projects)</i>					
<i>Water/Sewer Improvements</i>					
<i>Street Improvements</i>					
<i>Sidewalks</i>					
<i>Solid Waste Disposal Improvements</i>					
<i>Flood Drain Improvements</i>					
<i>Other Infrastructure Needs</i>					
<i>PUBLIC SERVICE NEEDS (people)</i>					
<i>Senior Services</i>					
<i>Handicapped Services</i>					
<i>Youth Services</i>					
<i>Child Care Services</i>					
<i>Transportation Services</i>					
<i>Substance Abuse Services</i>					
<i>Employment Training</i>					
<i>Health Services</i>					
<i>Lead Hazard Screening</i>					
<i>Crime Awareness</i>					
<i>Other Public Service Needs</i>					
<i>ECONOMIC DEVELOPMENT</i>					
<i>ED Assistance to For-Profits(businesses)</i>					
<i>ED Technical Assistance(businesses)</i>					
<i>Micro-Enterprise Assistance(businesses)</i>					
<i>Rehab; Publicly- or Privately-Owned Commercial/Industrial (projects)</i>					
<i>C/I* Infrastructure Development (projects)</i>					
<i>Other C/I* Improvements(projects)</i>					
<i>PLANNING</i>					
<i>Planning</i>					
<i>TOTAL ESTIMATED DOLLARS NEEDED:</i>					

## ***The Local Grantee Action Plan***

Where the local grantee's Three to Five Year Consolidated Plan is intended to cover the medium- and longer-term, the Annual Action Plan highlights the tasks to be undertaken by the grantee in the coming 12-month program year. Similar to the Three to Five Year Plan, the local Annual Action Plan has been updated to include performance measures. The key sections of the local Action Plan include:

- ❑ **Standard Form 424**
- ❑ **Executive Summary:** This is a concise summary of the annual plan;
- ❑ **Sources of Funds:** The grantee must identify the public and private resources it plans to use to achieve the plan;
- ❑ **Allocation Priorities and Geographic Distribution:** The grantee must describe why it chose its allocation priorities and its planned geographic distribution of assistance;
- ❑ **Homeless and Other Special Populations Activities:** In this section the grantee will describe activities to address emergency shelter and transitional housing needs of homeless individuals and homeless families with children;
- ❑ **Needs of Public Housing:** The grantee must identify the manner in which the plan of the jurisdiction will address the needs of public housing;
- ❑ **Antipoverty Strategy:** In this section the grantee will describe the actions it plans to take during the next year to reduce the number of poverty level families;
- ❑ **Lead-Based Paint Hazards:** This section describes the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing;
- ❑ **Other Actions:** The grantee must briefly describe actions that will take place during the next year to address obstacles to meeting underserved needs; foster and maintain affordable housing; remove barriers to affordable housing; develop institutional structure; enhance coordination between public and private housing, health, and social service agencies; and encourage public housing residents to become more involved in management and participate in homeownership;
- ❑ **Citizen Participation:** The grantee must summarize the citizen participation process and results;
- ❑ **Certifications** required under 91.225 and 91.425;
- ❑ **Monitoring:** In this section the grantee will briefly describe actions that will take place during the next year to monitor its housing and community development activities;

- **Statement of Specific Annual Objectives:** This statement highlights the annual outcomes that the grantee intends to achieve under this Action Plan.

- The grantee can use Table 3A for this Statement.

It is recommended that these indicators be the same as the CPD system – Grantees can add additional indicators as locally needed for the Action Plan period.

This objective number relates to the numbers for the nine different types of outcome statements (see above). There are separate sheets for suitable living environment and housing.

**Table 3A Summary of Specific Annual Objectives**

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>EO-1 Availability/Accessibility of Economic Opportunity</b>							
EO-1.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							
<b>EO-2 Affordability of Economic Opportunity</b>							
EO-2.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							
<b>EO-3 Sustainability of Economic Opportunity</b>							
EO-3.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							

The Specific Annual Objectives are intended to be the annual outcomes to be achieved by the program. The specific annual objectives should tie to the objectives described in the 3 to 5 Year Plan (Tables 1C and 2C) and these objectives can be copied from the 3 to 5 Year Plan and listed here. If the grantee will undertake all of the 3 to 5 year planned activities in the coming program year, then the annual objectives would be the same as the 3 to 5 year objectives. However, it is also possible that the annual objectives will be a subset of the longer term 3 to 5 year objectives. For example, the grantee might plan to start an economic development program in year 4 of the 5 Year Plan. This objective would thus not be included in the annual plan submitted in Year 2. See below for an example of this table.

Below is an example of how a grantee might fill out Table 3A for the FY07 Action Plan. Assume that this same grantee as described in the example above and they run will run all four types of programs in FY07.

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-2 Affordability of Decent Housing</b>							
DH-2.1	Address the need for affordable decent housing by offering rehabilitation assistance to very low income elderly households	CDBG	<ul style="list-style-type: none"> <li>■ Number of units occupied by very low income elderly</li> <li>■ Number brought to standard</li> <li>■ Number qualified as Energy Star</li> <li>■ Number of units made accessible</li> </ul>	2005			
				2006			
		HOME		2007	30		
		2008					
		2009					
<b>GOAL</b>				<b>30</b>			
DH-2.2	Address the need for affordable decent housing by offering downpayment assistance to low income households	HOME	<ul style="list-style-type: none"> <li>■ Number of households low-income households assisted</li> <li>■ Number of first time homebuyers</li> <li>■ Number receiving counseling</li> <li>■ Number receiving downpayment/closing costs</li> </ul>	2005			
				2006			
				2007	50		
		2008					
		2009					
<b>GOAL</b>				<b>50</b>			
<b>SL-3 Sustainability of Suitable Living Environment</b>							
SL-3.1	Improve the sustainability of the suitable living environment by reducing gang-related crime through counseling programs	CDBG	<ul style="list-style-type: none"> <li>■ Number of households assisted</li> <li>■ Number of persons with new access to a service</li> </ul>	2005			
				2006			
				2007	100		
		2008					
		2009					
<b>GOAL</b>				<b>100</b>			
<b>EO-1 Availability/Accessibility of Economic Opportunity</b>							
EO-1.1	Enhance the accessibility of economic opportunity and promote job creation by assisting new high tech businesses to be created	CDBG	<ul style="list-style-type: none"> <li>■ Number of households assisted</li> <li>■ Total number of jobs</li> <li>■ Employer sponsored health care</li> <li>■ New businesses assisted</li> </ul>	2005			
				2006			
				2007	50		
		2008					
		2009					
<b>GOAL</b>				<b>50</b>			

- ❑ **Annual Affordable Housing Goals:** Under this section, the grantee will describe the number of homeless, non-homeless, and special-needs households to be provided affordable housing;

➤ The grantee can use Table 3B to highlight these goals.

This number should be the grantee's best estimate of the total number of units to be completed during the grantee's coming 12-month program year.

### ANNUAL HOUSING COMPLETION GOALS

	Annual Expected Number Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
<b>ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)</b>					
Homeless households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Rental</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>		
Homebuyer Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Owner</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Housing</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL HOUSING GOALS</b>					
Annual Rental Housing Goal		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Total Annual Housing Goal</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Outcome Measures:** Per the Con Plan regulations, the grantee must identify the annual outcomes/objectives it expects to achieve. The grantee can incorporate the CPD measures within Tables 3A and 3C. The grantee can also incorporate the outcomes/objectives in its Action Plan narratives or in locally-designed tables.

**Description of Activities:** The grantee must describe the types of activities it intends to fund during the program year. The grantee can use Table 3C to describe these projects.

**Table 3C  
Consolidated Plan Listing of Projects**

**Jurisdiction's Name** \_\_\_\_\_

**Priority Need** \_\_\_\_\_

**Project Title** \_\_\_\_\_

**Description** \_\_\_\_\_

**Objective category:**  Suitable Living Environment  Decent Housing  Economic Opportunity  
**Outcome category:**  Availability/Accessibility  Affordability  Sustainability

**Location/Target Area** \_\_\_\_\_

The grantee should check the appropriate box for each objective and one outcome should be chosen for each activity.

The objective number is the numeric identification of the CPD outcome statement – such as EO 1.1

Objective Number	Project ID	<b>Funding Sources:</b> CDBG _____ ESG _____ HOME _____ HOPWA _____ Total Formula _____ Prior Year Funds _____ Assisted Housing _____ PHA _____ Other Funding _____ Total _____
HUD Matrix Code	CDBG Citation	
Type of Recipient	CDBG National Objective	
Start Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
Performance Indicator	Annual Units	
Local ID	Units Upon Completion	

It is recommended that the performance indicator be the same indicators as those listed in the CPD system. Grantees can choose additional indicators.

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

Below is an example of how a grantee might fill out Table 3C for the F707 Action Plan for one program run by a grantee. Assume that this same grantee as described in the example above.

**Table 3C  
Consolidated Plan Listing of Projects**

**Jurisdiction's Name:** City of Westville  
**Priority Need:** Owner Occupied Housing  
**Project Title:** Homeowner Rehabilitation for Very Low Income Seniors

**Description**

This program will offer loans and grants to very low income seniors living throughout the jurisdiction. The purpose is to assist these seniors to rehabilitate their homes. The primary focus will be on seniors living in extremely dilapidated homes and those needing handicapped access improvements. The grantee expects that it will be able to serve approximately 30 seniors during our program year. All program participants must be considered an elderly household and their household income may not exceed HUD's published very low income limits, as adjusted by family size. The program will be available to seniors living anywhere in the city, although preference on the waiting list will be given to households in the City's Prospect Heights neighborhood, a HUD-approved NRSA.

**Objective category:**  Suitable Living Environment     Decent Housing     Economic Opportunity  
**Outcome category:**  Availability/Accessibility     Affordability     Sustainability

**Location/Target Area:** Any senior can apply but preference is given to the residents of the Prospect Heights neighborhood.

Objective Number DH 2.1	Project ID 07-01
HUD Matrix Code 14A	CDBG Citation 570.201
Type of Recipient Grantee	CDBG National Objective LMI Housing
Start Date (mm/dd/yyyy) 1/1/07	Completion Date (mm/dd/yyyy) 12/31/07
Performance Indicator • Number of units occupied by very low income elderly • Number brought to standard • Number qualified as Energy Star • Number of units made accessible	Annual Units 30
Local ID	Units Upon Completion 120

**Funding Sources:**

CDBG	\$1,000,000
ESG	
HOME	\$500,000
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$500,000
Total	\$2,000,000

The primary purpose of the project is to help:  the Homeless  Persons with HIV/AIDS  Persons with Disabilities  Public Housing Needs

In addition to the general Action Plan sections, each of the programs requires specific text, including (Note: this list is not all inclusive and local grantees must consult with the Con Plan regulations for more information):

- ❑ CDBG-specific narrative includes:
  - Sources of funds;
  - Float-funded activities;
  - Program benefit and location;
  - Contingency; and
  - Urgent needs.
  
- ❑ HOME-specific narrative includes:
  - Resale/recapture provisions;
  - HOME tenant-based rental assistance;
  - Other forms of investment;
  - Affirmative marketing;
  - Minority/women's business outreach;
  - Refinancing;
  - American Dream Downpayment initiative; and
  - Minority homeownership.
  
- ❑ ESG-specific narrative includes:
  - Process and criteria for awarding grant funds; and
  - Source and amount of matching funds.
  
- ❑ HOPWA-specific narrative includes:
  - How the proposed activities will be used to meet the urgent needs of persons with HIV/AIDS and their families;
  - The public and private resources expected to be made available in connection with the proposed activities being funded;
  - The method of selecting project sponsors; and
  - HIV/AIDS housing goals.

Finally, the Action Plan includes an optional but suggested narrative on: Updated Analysis of Impediments to Fair Housing Choice; Local Performance Measurement Systems; and Neighborhood Strategy Areas.

### **The State Grantee Consolidated Plan**

As noted above, HUD has published specific guidance for states in how to develop their Con Plans. Although many of the sections are the same as the local grantees, there are several differences. As with the local grantees, states will submit the Con Plan as a series of tables and narratives:

- For states, tables 1A, 1B and 1C have been combined into one table 1 that is required to be submitted.
- Priority Housing Needs Table 2A is also required.
- All other tables are optional and the required information can be stated in the text or in other tables that the state develops on its own.

### ***State Grantee Three to Five Year Plan***

Every state grantee Three to Five Year Consolidated Plan must include the following information (Note: this is a summary of the requirements and state grantees are encouraged to read the state grantee Con Plan guidance for more details):

- Identification of the lead agency;
- The Con Plan process and consultations;
- The institutional structure that will be used to carry out activities and the strengths and gaps in that system;
- Executive summary of the intended outcomes and an evaluation of past performance;
- The citizen participation process;
- Housing, homeless and community development needs, including:
  - Housing needs (required Table 1 displays this data);
  - Homeless needs (Table 1);
  - Homeless facilities;
  - Number of non-homeless special needs (Table 1);
  - Lead based paint needs;
  - Market conditions;
  - Barriers to affordable housing;
  - Fair housing;

- Community development needs that affect more than one jurisdiction; and
  - HUD recommends that state grantees may also wish to address: other housing needs, including the housing credit needs; needs for housing for sub-populations of homeless persons; the strategy for eliminating chronic homelessness; available data; and the discharge coordination policy.
- The Strategic Plan, including:
- *The time period for the plan:* The grantee must indicate which years are covered by the plan;
  - *Priority needs analysis and allocation priorities:* The grantee must identify priority housing needs (use required Table 2A), priority homeless needs, other special needs, and priority non-housing community development needs, reasons for assigning of priorities and any obstacles to addressing those needs; and
  - *Objectives:* The grantee must also indicate the intended results of its planned activities over the three- to five-year period. Grantees can use Table 2C to identify those objectives. This section should specifically cover: housing objectives; community development objectives; the homeless strategy; the anti-poverty strategy; addressing the needs of public housing; actions to address lead-based paint; reduction of barriers to affordable housing; the strategy to coordinate low income housing tax credits; and how the state will enhance coordination between public and private agencies.
  - HUD also recommends that the state address: the state vision for change; specific objectives; plans for building on assets; Community Revitalization Strategy Areas; Housing and Community Development Partnerships; mapping; and benchmarks.
- The state tables are described below. Tables 1 and 2A are required. All other tables are optional but may be useful to states. Below is state Table 1.

**Table 1 Housing, Homeless and Special Needs (Required)**

**Housing Needs**

<b>Household Type</b>	<b>Elderly Renter</b>	<b>Small Renter</b>	<b>Large Renter</b>	<b>Other Renter</b>	<b>Total Renter</b>	<b>Owner</b>	<b>Total</b>
<b>0 –30% of MFI</b>							
% Any housing problem							
% Cost burden > 30							
% Cost Burden > 50							
<b>31 - 50% of MFI</b>							
% Any housing problem							
% Cost burden > 30							
% Cost Burden > 50							
<b>51 - 80% of MFI</b>							
% Any housing problem							
% Cost burden > 30							
% Cost Burden > 50							

**Table 1 Housing, Homeless and Special Needs (Required) -- Continued**

**Homeless Continuum of Care: Housing Gap Analysis Chart**

	Current Inventory	Under Development	Unmet Need/ Gap
--	-------------------	-------------------	-----------------

**Individuals**

Example	Emergency Shelter	100	40	26
<b>Beds</b>	Emergency Shelter			
	Transitional Housing			
	Permanent Supportive Housing			
	Total			
Chronically Homeless				

**Persons in Families With Children**

<b>Beds</b>	Emergency Shelter			
	Transitional Housing			
	Permanent Supportive Housing			
	Total			

**Continuum of Care: Homeless Population and Subpopulations Chart**

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households)				
1. Number of Persons in Families with Children				
2. Number of Single Individuals and Persons in Households without Children				
<b>(Add lines Numbered 1 &amp; 2 Total Persons)</b>				
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless				
b. Seriously Mentally Ill				
c. Chronic Substance Abuse				
d. Veterans				
e. Persons with HIV/AIDS				
f. Victims of Domestic Violence				
g. Unaccompanied Youth (Under 18)				

Special Needs (Non-Homeless) Subpopulations	Unmet Need
1. Elderly	
2. Frail Elderly	
3. Severe Mental Illness	
4. Developmentally Disabled	
5. Physically Disabled	
6. Persons w/Alcohol/Other Drug Addictions	
7. Persons w/HIV/AIDS	
8. Victims of Domestic Violence	
9. Other	

- Below is the template for state Table 2A.

**Table 2A (Required)**  
**State Priority Housing/Special Needs/Investment Plan Table**

<b>PART 1. PRIORITY HOUSING NEEDS</b>		<b>Priority Level</b> Indicate High, Medium, Low, checkmark, Yes, No	
<b>Renter</b>	<b>Small Related</b>	0-30%	
		31-50%	
		51-80%	
	<b>Large Related</b>	0-30%	
		31-50%	
		51-80%	
	<b>Elderly</b>	0-30%	
		31-50%	
		51-80%	
	<b>All Other</b>	0-30%	
		31-50%	
		51-80%	
<b>Owner</b>	0-30%		
	31-50%		
	51-80%		
<b>PART 2 PRIORITY SPECIAL NEEDS</b>		<b>Priority Level</b> Indicate High, Medium, Low, checkmark, Yes, No	
Elderly			
Frail Elderly			
Severe Mental Illness			
Developmentally Disabled			
Physically Disabled			
Persons w/ Alcohol/Other Drug Addictions			
Persons w/HIV/AIDS			
Victims of Domestic Violence			
Other			

**Table 2A (Optional)  
State Priority Housing Activities/Investment Plan Table**

<b>PART 3 PRIORITY HOUSING ACTIVITIES</b>	<b>Priority Level</b> Indicate High, Medium, Low, checkmark, Yes, No
<b>CDBG</b>	
Acquisition of existing rental units	
Production of new rental units	
Rehabilitation of existing rental units	
Rental assistance	
Acquisition of existing owner units	
Production of new owner units	
Rehabilitation of existing owner units	
Homeownership assistance	
<b>HOME</b>	
Acquisition of existing rental units	
Production of new rental units	
Rehabilitation of existing rental units	
Rental assistance	
Acquisition of existing owner units	
Production of new owner units	
Rehabilitation of existing owner units	
Homeownership assistance	
<b>HOPWA</b>	
Rental assistance	
Short term rent/mortgage utility payments	
Facility based housing development	
Facility based housing operations	
Supportive services	
<b>Other</b>	

- Table 2C is optional and is provided below:

Optional state Table 2C -- Summary of Specific Objectives

Specific Obj. #	Outcome/Objective Specific Objectives	Sources of Funds	Performance Indicators	Program Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
DH-1.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							
<b>DH-2 Affordability of Decent Housing</b>							
DH-2.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							
<b>DH-3 Sustainability of Decent Housing</b>							
DH-3.1				2005			
				2006			
				2007			
				2008			
				2009			
<b>MULTI-YEAR GOAL</b>							

Grantees should follow similar guidance in filling out Table 2C for states as was provided above for local grantees.

### State Grantee Action Plan

Where the state grantee's Three to Five Year Consolidated Plan is intended to cover the medium- and longer-term, the Annual Action Plan highlights the state's planned approach to programs in the coming 12-month program year. Similar to the Three to Five Year Plan, the state Annual Action Plan has been updated to include performance measures.

Note that unlike local governments, states do not provide a list of planned activities. Instead they provide a Method of Distribution (MOD). The MOD is to describe the various funding resources including program income; the funding categories; whether the state will allow Section 108 Loan Guarantees, Float-Financed Activities, or Community Revitalization Strategy Areas (and if so, how and how much); and the selection criteria and threshold factors the state will use.

The key sections of the state Action Plan include (Note: this is a summary of the requirements and state grantees are encouraged to read the state grantee Con Plan guidance for more details):

- **Executive Summary** – This is a summary of the planned objectives and outcomes and an evaluation of past performance;
- **Sources of Funds** – This is an identification of public and private resources;

- ❑ **Method of Distribution** – In this section the state identifies how it will distribute funds it expects to receive to local governments and nonprofits;
- ❑ **Allocation Priorities and Geographic Distribution** – This is a summary of the why the state made its allocation decisions and the geographic areas to receive assistance;
- ❑ **Other Actions:** The grantee must briefly describe actions that will take place during the next year to address obstacles to meeting underserved needs; foster and maintain affordable housing including Low Income Housing Tax Credits; remove barriers to affordable housing; evaluate and reduce lead paint hazards; reduce the number of households living in poverty; develop institutional structure; enhance coordination between public and private housing, health, and social service agencies; and encourage public housing resident initiatives;
- ❑ **Citizen Participation:** The grantee must summarize the citizen participation process and results;
- ❑ **Certifications** required under 91.325;
- ❑ **Monitoring:** In this section the grantee will briefly describe actions that will take place during the next year to monitor its housing and community development activities;
- ❑ **Statement of Specific Annual Objectives:** This statement highlights the annual outcomes that the state intends to achieve by the end of the program year under this Action Plan. The state grantee can use optional Table 3A for this Statement.

It is recommended that these indicators be the same as the CPD system – Grantees can add additional indicators as needed for the Action Plan period.

This objective number relates to the numbers for the nine different types of outcome statements (see above). There are separate sheets for suitable living environment and housing.

**Table 3A Summary of Specific Annual Objectives**

Specific Obj. #	Outcome/Objective Specific Annual Objectives	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>EO-1 Availability/Accessibility of Economic Opportunity</b>							
EO-1.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>EO-2 Affordability of Economic Opportunity</b>							
EO-2.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							
<b>EO-3 Sustainability of Economic Opportunity</b>							
EO-3.1				2005			
				2006			
				2007			
				2008			
				2009			
MULTI-YEAR GOAL							

The Specific Annual Objectives are intended to be the annual outcomes to be achieved by the program. The specific annual objectives should tie to the objectives described in the 3 to 5 Year Plan.

**Annual Affordable Housing Goals and Homeless and Other Special Needs:**

Under this section, the grantee can describe the number of homeless, non-homeless, and special-needs households to be provided affordable housing;

- The state grantee can use optional Table 3B to highlight these goals.

This number should be the state grantee's best estimate of the total number of units to be completed during the grantee's coming 12-month program year.

**ANNUAL HOUSING COMPLETION GOALS**

	Annual Expected Number Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
<b>ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)</b>					
Homeless households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-homeless households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special needs households		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Rental</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>		
Homebuyer Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Owner</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)</b>					
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Rehabilitation of existing units		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homebuyer Assistance		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
<b>Total Sec. 215 Affordable Housing</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>ANNUAL HOUSING GOALS</b>					
Annual Rental Housing Goal		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Total Annual Housing Goal</b>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- ❑ **Outcome Measures:** Per the Con Plan regulations, the state grantee must identify the annual outcomes/objectives it expects to achieve. The state grantee can incorporate the CPD measures within optional Tables 3A and 3C. The grantee can also incorporate the proposed outcome in narrative.
- ❑ **Description of Activities:** The state grantee must describe the types of activities it intends to fund during the program year. The grantee can use Table 3C to describe these projects.

It is recommended that the state grantee use the outcome indicators from the CPD framework. States can also develop their own indicators.

<b>Table 3C (Optional)</b>			
<b>Annual Action Plan</b>			
<b>Planned Project Results</b>			
<b>Outcomes and Objectives</b>	<b>Performance Indicators</b>	<b>Expected Number</b>	<b>Activity Description</b>

It is recommended that the state grantee use the outcomes and the objectives outlined in the CPD Framework. The state should use the codes outlined above, including:

	<b>Availability/Accessibility</b>	<b>Affordability</b>	<b>Sustainability</b>
<b>Decent Housing</b>	DH-1	DH-2	DH-3
<b>Suitable Living Environment</b>	SL-1	SL-2	SL-3
<b>Economic Opportunity</b>	EO-1	EO-2	EO-3

In addition to the general state Action Plan sections, some of the programs require specific text, including (Note: this list is not all inclusive and grantees must consult with the state Con Plan guidance for more information):

- ❑ HOME-specific narrative includes:
  - Resale/recapture provisions;
  - HOME tenant-based rental assistance;
  - Other forms of investment;
  - Affirmative marketing;

- Refinancing;
- American Dream Downpayment initiative; and
- ❑ HOPWA-specific narrative includes:
  - How the proposed activities will be used to meet the urgent needs of persons with HIV/AIDS and their families;
  - The public and private resources expected to be made available in connection with the proposed activities being funded;
  - The method of selecting project sponsors; and
  - HIV/AIDS housing goals.

Finally, the Action Plan includes an optional but suggested narrative on: Updated Analysis of Impediments to Fair Housing Choice; and a narrative of progress toward items in the Three to Five Year Plan.

### **Using The Consolidated Plan Management Process (CPMP)**

The Consolidated Plan Management Process (CPMP) is a tool developed by HUD to assist grantees in completing their Con Plans. It includes three key sections:

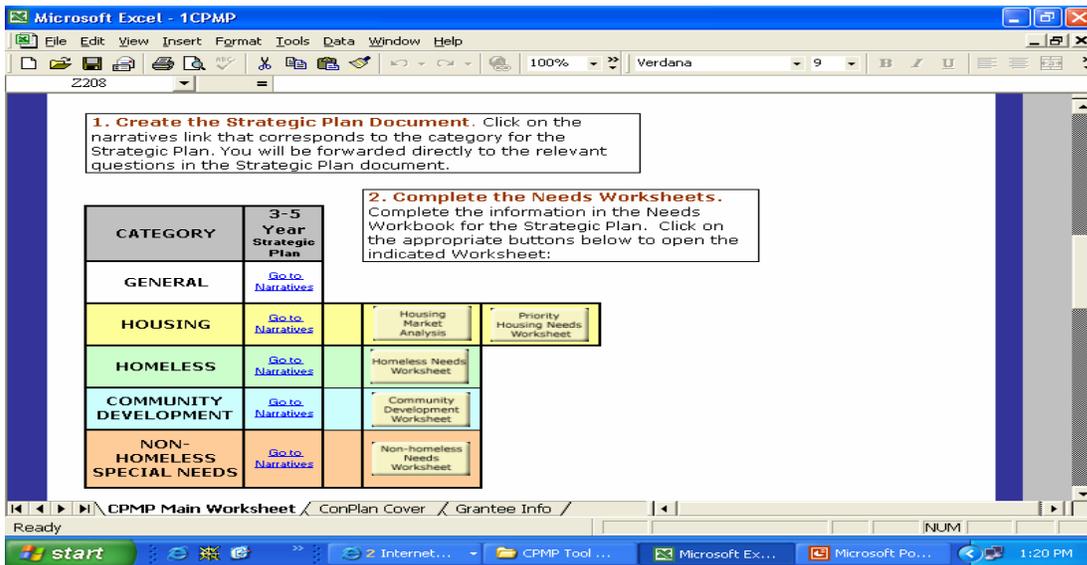
- ❑ Three to Five Year Plan;
- ❑ Action Plan; and
- ❑ CAPER.

By being set up in this way, the CPMP tool readily enables the grantee to enter data into the appropriate sections of the Plan and then tie the Plan and the CAPER together. Use of the CPMP tool is optional. However, many grantees have found it to be a helpful tool in planning and tracking their programs.

The CPMP tool is free to grantees and can be found at <http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/cpmp/index.cfm>, along with helpful advice in how to use the tool.

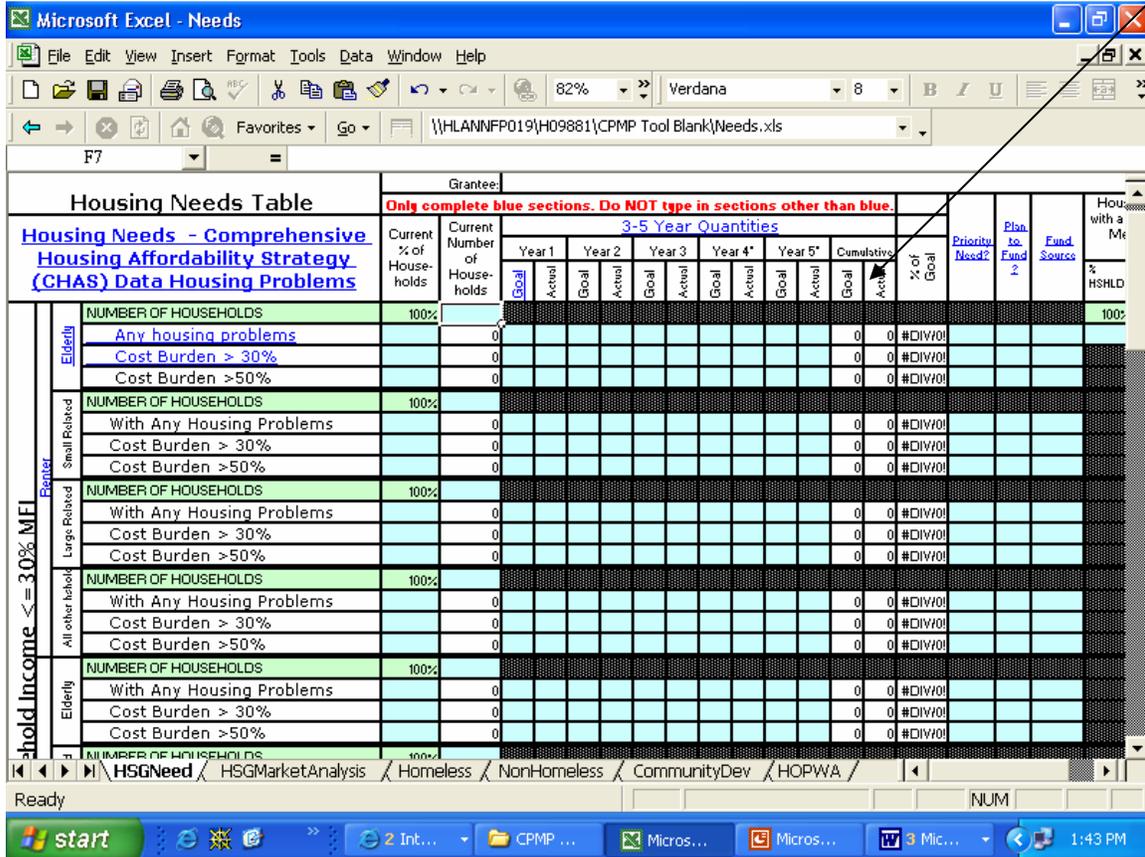
The CPMP tool has been updated to reflect the latest CPD performance measurement guidelines. While many of the CPMP data collection instruments will look similar to the tables described in the previous sections of this text, there are a few differences. The following text briefly highlights the use of CPMP for planning desired grantee outcomes.

The CPMP begins with the Three to Five Year Consolidated Plan and includes sections where that narrative can be entered.



The CPMP then asks the grantee to fill out the tables related to the Three to Five Year Plan, including housing needs:

Note that the Actuals are not reported until the CAPER is submitted.



There are similar tables for community development and homeless/persons with special needs. There is also a table on the program specific objectives, similar to the annual one shown in the section below.

After the Three to Five Year Plan is complete, the CPMP assists the user to complete the Action Plan narrative. The grantee then completes the Action Plan tables, including the needs summary and the projects description (below).

Grantee Name: **Jurisdiction**

CPMP Version 2.0

<b>Project Name:</b>		<b>IDIS Project #:</b>		<b>UOG Code:</b>		<b>UOG Code</b>	
<b>Description:</b>							
<b>Location:</b> Enter location, address, zip codes, census tracks, or other elements that will help to identify the location of the project.				<b>Priority Need Category</b>			
				<b>Select one:</b>		Priority Need Category ▼	
				<b>Explanation:</b>			
<b>Expected Completion Date:</b> (mm/dd/yyyy)							
Objective Category <input type="radio"/> Decent Housing <input type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity				<b>Specific Objectives</b>			
Outcome Categories <input type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability				1, ▼		▼	
				2, ▼		▼	
				3, ▼		▼	
<b>Project-level Accomplishments</b>	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed		
		Underway			Underway		
		Complete			Complete		
Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed			
	Underway			Underway			
	Complete			Complete			
Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed			
	Underway			Underway			
	Complete			Complete			
<b>Proposed Outcome</b>		<b>Performance Measure</b>		<b>Actual Outcome</b>			
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼			
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼			
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼			
<b>Program Year 1</b>	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
<b>Program Year 2</b>	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
<b>Program Year 3</b>	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units			
	Actual Units			Actual Units			
<b>Program Year 4</b>	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.		
		Actual Amount			Actual Amount		

Select only one objective and one outcome.

At the time of the Action Plan, only fill out the "proposed" block.

Suggest using the CPD system outcome.

Suggest using the CPD outcome indicators.

If the accomplishment type is a facility, count it as one unit.

Estimate the outcomes by year for the project planned under the Action Plan.

Suggest using the CPD outcome statements. However, grantees can select any objective statement that is appropriate locally.

Finally, the grantee completes the Summary of Specific Annual Objectives for the projects it has identified.

Jurisdiction

CPMP Version 2.0

**New Specific Objective**

**Summary of Specific Annual Objectives**

Specific Obj. #	Outcome/Objective	Sources of Funds	Performance Indicators	Year	Expected Number	Actual Number	Percent Completed
<b>DH-1 Availability/Accessibility of Decent Housing</b>							
<b>DH-1 (1)</b>	Specific Objective	Source of Funds #1	Performance Indicator #1	2005			#DIV/0!
				2006			#DIV/0!
		Source of Funds #2		2007			#DIV/0!
				2008			#DIV/0!
		Source of Funds #3		2009			#DIV/0!
		<b>MULTI-YEAR GOAL</b>					<b>0</b>
	Specific Annual Objective	Source of Funds #1	Performance Indicator #2	2005			#DIV/0!
				2006			#DIV/0!
		Source of Funds #2		2007			#DIV/0!
				2008			#DIV/0!
		Source of Funds #3		2009			#DIV/0!
		<b>MULTI-YEAR GOAL</b>					<b>0</b>
	Source of Funds #1	Performance Indicator #3	2005			#DIV/0!	
			2006			#DIV/0!	
	Source of Funds #2		2007			#DIV/0!	
			2008			#DIV/0!	
	Source of Funds #3		2009			#DIV/0!	
	<b>MULTI-YEAR GOAL</b>					<b>0</b>	#DIV/0!

This objective number relates to the numbers for the nine different types of outcome statements (see above). There are separate sheets for suitable living environment and economic opportunity.

It is recommended that these indicators be the same as the CPD system – Grantees can add additional indicators as locally needed for the Action Plan period.

The Specific Objectives are intended to be the specific annual outcomes to be achieved by the program. Grantees can elect to develop their own specific annual objectives but they will still need to report on the CPD system outcomes, objectives and indicators in IDIS and the CAPER. The grantee can also simply use one or more of the outcome statements from the CPD system (such as availability of decent housing) and add any context for the grantee's specific program (see the example).

### Other Implementation Tasks

In addition to the Con Plan, the grantee needs to undertake additional steps in the process of implementing the outcome measures. During the initial year of the CPD performance measures, the grantee needs to share information with its partners so that these partners understand the necessity and uses of the outcome system. Key partners and others who need to be informed about the system include:

- Grantee staff;
- Political leaders; and
- State recipients, subrecipients, developers, COGs/planning districts, other partners.

There are many options for how the grantee can inform these partners about the requirements and benefits of performance measurement, including:

- Outreach materials;
- Briefing sessions; and
- Staff training.

Once all of the partners have been briefed, it is important that the grantee begin to collect the outcome data. For many grantees, much of the anticipated outcome information will be collected in the initial application kit that it uses to identify proposed projects. For example, the initial project application can provide a summary of the type of proposed project and its intended outcomes. This, in turn, will assist the grantee or the applicant in selecting an appropriate outcome and objective.

So, grantees should evaluate their existing application materials and assess where and how relevant outcome data should be collected. Likely outcome-related data items that would be useful to collect in the application include:

- Intended result of project; and
- Program design information that can help inform likely outcome indicators (such as whether the applicant plans to bring units up to Energy Star standards).

As a part of the application process, the grantee needs to determine whether the applicant or the grantee staff will assign the outcome and objective to the project. Some grantees may prefer to allow the applicant to identify the intended results while other grantees feel that it is more efficient for grantee staff to make this determination.

Once the application kit is updated, the grantee needs to consider whether the outcome measures will affect the project selection process. For example, a grantee could determine that it will have an application selection preference for projects that address one particular type of outcome or objective. Alternately, the grantee could give greater preference for applications that demonstrate a higher number of units produced or households served. It is up to the grantee to determine whether the outcome system will be used in the project selection process. If the grantee has determined that the outcomes will be a factor in awarding projects, it is recommended that these decision factors be enumerated in a policy document that ensures the fair implementation of the policy.

After projects have made it through the selection process and the grantee is ready to sign a funding agreement with the developer, CHDO, subrecipient, or other partner, it is important that the grantee's agreement clearly elaborate on its requirements and policies regarding needed data. In addition to any standard compliance-related requirements, the agreement should clearly state:

- The type of outcome data to be reported;
- The timeframe for submission of outcome data; and
- The files to be kept to document results.

At the start of the new funding cycle, many grantees conduct implementation workshops to inform partner staff of their rules and requirements. If the grantee elects to offer this type of training, it should incorporate the outcome measures and the related data collection in this training. Training topics could include:

- Why performance measurement is important;
- Definitions of outcomes, objectives, and indicators;
- Tips for collecting difficult data items;
- Sample forms or checklists; and
- Changes in the previous grant agreement and reporting responsibilities.

As a part of these outreach and data collection efforts, the grantee should evaluate its data collection forms. Most grantees use a standard set of forms that subrecipients, developers, CHDOs, and others use to collect and report data to the grantee. The grantee should take this opportunity to assess whether these forms:

- Collect all of the compliance data that is needed;
- Collect all of the outcome indicator data that is needed;
- Are well-designed and user-friendly.

If the grantee elects to update its forms, it may wish to obtain input from not only the grantee program staff but also the grantee's IDIS staff and the partners who will need to use the forms.

It is also important to note that not all of the outcome data will be collected at the same time. In general, the timing of the outcome data collection will vary based upon the project type:

- Some projects – such as many community facilities – will report on data that is known at the outset of a project. For example, if the CDBG grantee is funding a community center, the indicator for that activity will be based on the number of persons getting access to the new facility. The grantee will likely determine this when it selects the project and ensures national objective compliance. So, this outcome data can be entered when the project is set up.
- Other projects – such as housing projects – are created with a direct beneficiary in mind. The outcome data on that activity cannot be entered until the household is selected and information about it is collected. For example, the grantee will not be able to fill out the income, race/ethnicity, or disability indicator information until a particular unit is occupied. So, this type of outcome data is likely to be obtained later in the process, once the activity is complete.
- Finally, some projects are ongoing or have an extended timeframe for collecting outcome data. For example, economic development projects that create jobs might require a few years until all the hiring is complete. The grantee will likely want to collect and enter that data on a periodic basis as it is received while jobs are being created. The grantee could wait until all jobs were created to enter any

outcome data but that could add to administrative burden and delay the reporting of partial results.

Currently, HOME, ESG, and HOPWA data is collected and reported in IDIS at the project address level. However, CDBG data is collected and reported at the activity level. For example, a CDBG grantee could set up a homeowner rehabilitation activity that might be inclusive of 20 different units. The HOME Program would require that individual address and characteristic data be entered for each of these 20 sites. The CDBG program allows grantees to aggregate the data and enter it all at once as one, 20-unit activity.

In the short term, CDBG grantees can continue to operate under this approach. However, in FY07 this policy may change for housing activities under CDBG so that HUD and grantees can be aware of the individual characteristics of the households served.

For projects where the CPD programs cover only a part of the overall funding, grantees will count **all** outcomes from the project. For example:

- HOPWA funds land acquisition and private funds are used for development
  - Count all units even though HOPWA provides only partial funding;
- HOME funds the construction of 25 of 100 units in a rental housing project
  - Provide data on HOME units and data on other units; and
- CDBG pays for half of the cost of a counseling program
  - Count all counseled persons.

Grantees are not required to report on community development activities that do not contain HUD CPD funds (HOME, CDBG, ESG, HOPWA) in some phase of the activity. However, grantees may wish to track this data to assess its own progress.

At the completion of the project, the grantee will submit a CAPER to report on the results of the activities. The CAPER has both narrative and tables. If the grantee is using CPMP, the CAPER reporting is readily tied into the intended outcomes that were listed in the Action Plan. If the grantee is not using the CPMP, the grantee will need to undertake its own analysis of its progress toward the planned outcomes. More information about the CAPER and about evaluating program performance can be found in Chapter 13.