

#### Best Practices for the Consolidated Plan and Action Plan

May 2019



### Housekeeping

#### Logistics:

- 90-minute webinar
- All lines are muted
- Submit technical issues through "Question" function

#### **Asking questions:**

- There will be periodic pauses to discuss questions
- Can also submit questions through "Question" function

#### Introductions

- Rob Sronce, The Cloudburst Group
- Ben Sturm, The Cloudburst Group





What is your current Consolidated Plan cycle?

COMMUNITY PLANNING DEVELOPMENT

- 2015-2019
- 2016-2020
- 2017-2021
- 2018-2022
- 2019-2023

#### Session Objectives

During this webinar, you will learn how to:

- Correctly set up a new Consolidated Plan template in IDIS
- Incorporate new program requirements into the Con Plan
- Correctly set up a new Annual Action Plan



#### FY2019 – HUD Updates

- HUD Allocation Timeline
  - ~ 60 days after federal budget is released
- CPD Notice 19-01 (https://www.hudexchange.info/resource/5797/notice-cpd-1901-guidance-on-submitting-consolidated-plans-and-annual-action-plans-for-fy-2019/)
- FY2019 Action Plans MUST be submitted by August 16, 2019
- Grant agreements executed after plan approval and congressional release



### **Creating a New Consolidated Plan**



#### Setting up a New Consolidated Plan



### Copying versus Creating Con Plans

Copying Con Plan	Creating New Action Plan				
Best if HUD programs or approach is not changing from the previous cycle	Best if including a new HUD CPD program or PHA in the new Con Plan				
Copies all information from previous Con Plan	Blank template				
Need to review and update all screens to reflect information for the new 3 or 5-year cycle	Complete all fields and screens; including projects				
Default data automatically updated	Default data automatically updated				
Unable to change CPD programs and the Public Housing Agencies included in the previous Con Plan	Ability to select or unselect CPD programs and Public Housing Agencies				

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### Adding a New Con Plan



#### Adding a New Con Plan

• Let's go to IDIS



#### Copying the Previous Con Plan



#### Resources

- Resources
  - Con Plan in IDIS Desk Guide
  - Quick Guides

#### https://www.hudexchange.info/programs/





#### Reminders for Consortia Grantees

- Consolidated Plans and Action Plans can only be created by Consortia Lead Entity
  - IDIS will automatically add the Con Plan template for participating entitlement grantees
- Only Lead Entity can submit Con Plan in IDIS

# **Consolidated Plan Template**



#### **Con Plan Sections**

- Setup (AD screens)
- Executive Summary (ES screens)
- The Process (PR screens)
- Needs Assessment (NA screens)
- Market Analysis (MA screens)
- Strategic Plan (SP screens)
  First Year Action Plan (AP screens)



• Narrative Boxes

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- 4,000 character limit
- Use Paste from Plain Text or Paste from Word widgets
- Additional elements can be inserted throughout the template
  - Always optional

#### • Data Tables

#### • HUD-provided default data



#### • Use of Alternate Data



Alternate Data Sources

- Survey Data
  - Neighborhood surveys
  - Formal local plans & studies
- Administrative Data
  - National data sources (ACS, CHAS)
  - State unemployment data
  - Code enforcement records



#### **Additional Elements**

Demographics									
		Base Y	ear: 2000	Most Recent	Year: 2016		%Change		
Population			2688418	2	898292		8		
louseholds			1038940	1	115858		7		
1edian Income			57017		53571		-6		
Di	isplayed	Used in Report							
Data Source: D	efault Data	•	2000 Census (Base Year), 20	09-2013 ACS (Most Recent Year)					
A	Iternate Data	۲	Sort Data Source Name 1 2016 ACS Data Notes:			[	Delete Data Set		
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#### **Regulation Citations**

#### **Consolidated Plans**

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

 Each section has a HUD CFR citation within the heading to point you to the place with more information



#### **Review and Submit**

• AD-25 Administration Screen

#### **Consolidated Plans**

#### **Quality Checks Results**



### New Features and Requirements



#### **Broadband Access**

Grantees must evaluate availability of broadband access

- Consultation & Citizen Participation Process
  - 1. Public and private organizations, including broadband internet service providers
  - 2. Organizations engaged in narrowing the digital divide



#### **Broadband Access**

#### Housing Market Analysis

- 1. The broadband needs of housing occupied by low- and moderate-income households based on analysis of data, identified by the jurisdiction, for its low- and moderate- income neighborhoods.
- 2. State specific: The broadband needs of housing in the state based on an analysis of data, identified by the jurisdiction
- 3. Broadband needs, including:
  - The need for broadband wiring and for connection to broadband service in the household units.
  - The need for increased competition by having more than one internet service provider serve the jurisdiction



### Broadband Access (Cont.)

- Local Data Sources
  - National Broadband map created by the National Telecommunication and Information Administration (NTIA) of the Dept of Commerce
  - Broadband availability data in Federal Communications Commission (FCC) Form 477
- Goals and Projects
  - No actions mandated
  - Grantee can determine the best course of action for inclusion in the Strategic Plan and Annual Action Plan



### Resiliency

Grantees must evaluate the vulnerability of housing occupied by low- and moderate-income households to natural hazard risks in its Con Plan

- Consultation & Citizen Participation Process
  - 1. Agencies whose primary responsibilities include the management of flood prone areas, public land, or water resources
  - 2. Emergency management agencies
- Housing Market Analysis
  - The vulnerability of housing occupied by low- and moderate- income households to increased natural hazards associated with climate change based on – An analysis of data, findings, and methods used by the jurisdiction to analyze this vulnerability.



### Resiliency (Cont.)

- Local Data Sources
  - 1. The State's or jurisdiction's FEMA-approved hazard mitigation plan
  - 2. The Community Resilience Planning Guide for Buildings and Infrastructure Systems (prepared by NIST)
- Goals and Projects
  - > No actions mandated
  - Grantee can determine the best course of action for inclusion in the Strategic Plan and Annual Action Plan



#### **EnVision Centers**

#### Notice CPD 18-04

HUD provided guidance on incorporating EnVision Centers into the Consolidated Planning process

(https://www.hudexchange.info/resource/5774/notice-cpd-1804-supporting-envision-centers-through-the-consolidated-planning-process/)

- Consulting with Stakeholders (CFR 91.100 and 91.110)
  - Public Housing Agencies and their residents
  - Business community
- Determining Needs and Setting Priorities (CFR 91.205, 91.305, 91.215 and 91.315)
  - May include EnVision Center analysis as part of Needs Assessment and Market Analysis
- Incorporating EnVision Centers in the Strategic Plan (CFR 91.215 and 91.315)
  - Highlighting Revitalization & Economic Empowerment Efforts
  - Identify Public Housing Priorities and Objectives
  - Align Anti-Poverty Strategy & Coordination Efforts



#### **Opportunity Zones**

- Created by 2017 Tax Cut and Jobs Act
- Designed to stimulate private investment in designated, low-income census tracts
- Consider use of CPD program funds for eligible activities in Opportunity Zones in Con Plan

### Section 108

# Considering using Section 108 guaranteed loan funds for a project or loan fund?

- For Entitlements: If you include a discussion of the Section 108 project or loan fund in your community's Con Plan/Action Plan, doing so will likely allow your community to meet the application pre-submission requirements at 24 CFR 570.704(a) for citizen participation so that no separate process is necessary
- For States, if your State wants to apply or make this resource available to non-entitlements, it should amend its method of distribution to note the approximate amount of existing 108 obligations for the State and any non-entitlements and identify the maximum amount of guaranteed loan funds that the State will apply for during the period covered by the Action Plan
- If your application for a loan fund commitment is approved, then your community will need to ensure it follows its citizen participation requirements for individual projects either through the Con Plan or Action Plan process or separately (per project or group of project)

If your community has a current Section 108 loan (or will be applying for one) then you should discuss your use of CDBG funds for Section 108 debt service in your Consolidated Plan.



### Section 108 – For Entitlements

In order to meet HUD's pre-submission requirements at 570.704(a) (if published in Con Plan or published separately) for a Section 108 application, should, at a minimum, include the following:

- How the proposed activities will relate to the community development objectives outlined in a community's Consolidated Plan or Action Plan.
- A discussion of the activities to be carried out with the guaranteed loan funds in sufficient detail including:
  - eligible activity citation under 24 CFR 570.703
  - the amount of funding,
  - Iocation(s) of activity/activities
  - national objective to be met (including criteria at 24 CFR 570.208)
  - where citizens can get more information about the proposed activities
  - description of the pledge of CDBG grants

description and estimate of CDBG or Section 108 funds to be used to pay any required fees



#### Section 108 – For Entitlements

#### **Please Note:**

- Your local HUD Field Office and HUD Headquarters' Financial Management Division can assist you to ensure draft language meets these requirements
- There are additional application requirements not listed above, but these are the minimum to meet 570.704(a) through the Con/Action Plan Process



#### Section 108: For States

#### **For States:**

In order to meet application requirements at 24 CFR 570.711, States should at a minimum:

- Describe the pledge of grants
- Identify the non- entitlement entities in the State that may be assisted (this can also be done in the MOD by listing specific entities to be assisted or indicating that all or a subset of entities may be assisted and describing how applications will be selected for assistance)
- A description of the activities to be carried out with the guaranteed loan funds including eligible activity citation under 24 CFR 570.703 and the national objective to be met (including criteria at 24 CFR 570.208) <u>OR</u> an indication of the types or types of activities to be assisted, provisions at 570.703 and 570.208 intended to be met
- A schedule for repayment of loan and identification of sources of repayments

Please Note: There are additional requirements for an application, but the above are those can occur as part of the State's Con/Action Plan Process



#### CDBG-DR

#### Grantee Requirements for incorporating CDBG-DR Funding into its Consolidated Plan:

- HUD initially waives the requirements for consistency with a grantee's ConPlan through each applicable FR Notice for CDBG-DR allocations.
- This waiver only applies until a certain point in time (this point in time is different based on FR Notice) and should occur when the grantee next updates its ConPlan

# Additional guidance on updating the Consolidated Plan for CDBG-DR recipients:

https://files.hudexchange.info/resources/documents/Consolidated-Plan-Updates-to-Reflect-Disaster-Recovery-Needs-and-Associated-Priorities.pdf



### Strategic Plan and Action Plan





#### Action Plan Relationship to Con Plan



#### Aligning GOIs



### **PROJECT SET-UP**



#### Project Set Up

#### AP-35 Projects screen of the AAP

#### Projects section in IDIS

C59819	Plans/Projects/Activities	Fundin
ion: Ionio	e 11 CDBG and 6 HOME activities that have been flagge	d. Click on the num
Profile Annual	Action Plan (2017-sample.1)	
AP-35 F	Projects - 91.220(d)	
HOME/HTF Save	Save and Return   Cancel	
ancellation • Indicate	es Required Field	
*Introdu	uction:	
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ction Plane		
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Figeets	No Projects have been added to this Annual Ac	tion Plan.
	Add an Existing Project	

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Jser: C59819 Role: Grantee	Plans/Projects/Activities	Funding,
Organization: SAN ANTONIO	You have 11 CDBG and 6 HOME activities that have been flagged. Click of	on the num
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ctivity Add Search Search HOME/HTF	Save   Reset	
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roject Add Search	Program Year	
onsolidated Plans Add Copy	*Program Year: v Add New Prog (ex: yyyy)	gram Year:
Search	IDIS Project ID:	
Add Copy Search	*Project Title:	ENTORHO
onsolidated nnual erformance	Grantee/PJ Project ID:	
Add	Description:	

#### Project Set Up

- As soon as the project is created on the AP-35 screen, it is automatically added in IDIS
  - **Best Practice Tip #1:** Avoid duplicated projects in the system. Make sure someone else doesn't set up the same projects separately in IDIS
  - Best Practice Tip #2: Projects NOT included in AP-35 screen will not link to the CAPER

### Project Details

Ann	nual Goals Supported				
Elin	ninate Slum and Blight				
Fur	ther Fair Housing		Streamline CAPER data		
Improve Public Facilities					by selecting only one
Im	prove Public Infrastructure				by selecting only one
Im	prove Quality of Life				annual goal
Pro	vide Affordable Housing for Homeowners				
Pro	vide Affordable Housing for Renters				
Ser	rve Homeless Families and Reduce Homelessness				
Spu	ur Economic Development				
Pric	prity Needs Addressed				
Inc	reasing Affordable Housing				
Im	proving Public Facilities and Infrastructure				
Rec	ducing Homelessness				
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No.	Goal Outcome Indicator	Quantity	Unit of Measures		Use the same GOIS
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#### **Project Details**

#### **\*Introduction:**

2017

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43-50200



Public Facilities: Park/Pool Improvements

PLANNING

**DEVELOPMEN** 

## Creating a New Year 2-5 Annual Action Plan



### Let's Copy!!

Click "Copy"

•

- Source Plan Year and Version
  - For Year 2 AAP, use Con Plan Source Year and Version
- Click "Copy" under Action Plan submenu
- Enter Source and New information

#### How to Copy your Action Plan

- Switch Profile - Manage Profile - Logout	Activity Search Activities		
Activity - Add - Search - Search HOME/HTF	Search Criteria Program: All <b>v</b>	IDIS Project ID:	
Project - Add - Search - Copy	Activity Name:	IDIS Activity ID: Grantee/PJ Activity ID:	
Consolidated Plans - Add - Copy - Search	Select ▼ Search   Reset		n
Annual Action Plans - Add - Copy - Search			

DEVELOPMEN

#### How to Copy your Action Plan



#### Create New AAP

- Click "Add" Action Plan
- Enter Program Year
- Associate with current Consolidated Plan



#### How to Create New AAP



#### How to Create New AAP

	AD-26 Administration of the Annual Action P	lan			
			Comp	plete all fields	
	Save   Cancel				
	AAP Program Year:*				
	AAP Title:*				
	AAP Plan Version:*				
	If Amendment:	N/A 🔻			_
	Programs included:*	CDBG HOME	ALL GR SELEC1	ANTEES YES	
J.C.	Is this Annual Action Plan associated		Select th Consolic	ne most current lated Plan	لى الم
	Associate with ConPlan			SO AND CONTRACTOR HOLES	COMMUNITY

#### How to Create New AAP



### Questions???

