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
Poll #1

What is your current Consolidated Plan cycle?

• 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


• 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

2015-2019 Con Plan

2. Create new 2020-2024 Con Plan

Edit and revise content
Enter new content
## Copying versus Creating Con Plans

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

Federal fiscal year in which the plan begins (i.e. 2020)

Federal fiscal year in which last program year begins (i.e. 2024)

Ensure correct programs are selected. Cannot change these after plan is created.

CONSORTIA: Only the Lead Entity can create the Con Plan

Select Grantee, Consortia, or Regional
Adding a New Con Plan

• Let’s go to IDIS
Copying the Previous Con Plan

- Switch Profile
- Add Profile
- Logout

Activity
- Add
- Search
- Search HOME/HTF
- Review
- CDBG Cancellation

Project
- Add
- Search
- Copy

Consolidated Plans
- Add
- Copy
- Search

Annual Action Plans
- Add
- Copy
- Search

Consolidated Annual Performance Evaluation Report
- Add
- Search

**Consolidated Plans**

**Copy Consolidated Plan**

- **Start year of the plan being copied**
- **Source Consolidated Plan's Start Year:**
- **Source Consolidated Plan's Version:**

- **New Consolidated Plan's Start Year:**
- **New Consolidated Plan's End Year:**
- **New Consolidated Plan's Version:**

- **If Amendment:** *N/A*

- **Housing Trust Fund Subgrantee:** No

**Must be entered exactly as it appears in the previous plan**

- **Federal fiscal year in which the plan begins (i.e. 2020)**
- **Federal fiscal year in which last program year begins (i.e. 2024)**

**CONSORTIA:** Only the Lead Entity can copy a plan
Resources

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

https://www.hudexchange.info/programs/consolidated-plan/
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)
Elements of the Template

• **Narrative Boxes**
  - 4,000 character limit
  - Use Paste from Plain Text or Paste from Word widgets

• **Additional elements can be inserted throughout the template**
  - Always optional
Elements of the Template

- **Data Tables**
  - HUD-provided default data

### Demographics

<table>
<thead>
<tr>
<th></th>
<th>Base Year:</th>
<th>Most Recent Year:</th>
<th>%Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>2008</td>
<td>2016</td>
<td></td>
</tr>
<tr>
<td></td>
<td>268,8418</td>
<td>289,8292</td>
<td>8%</td>
</tr>
<tr>
<td>Households</td>
<td>103,840</td>
<td>111,5868</td>
<td>7%</td>
</tr>
<tr>
<td>Median Income</td>
<td>57,017</td>
<td>53,971</td>
<td></td>
</tr>
</tbody>
</table>

**Updated to 2011-2015 ACS/CHAS Data**
Elements of the Template

- Use of Alternate Data
Elements of the Template

Alternate Data Sources

• Survey Data
  • Neighborhood surveys
  • Formal local plans & studies

• Administrative Data
  • National data sources (ACS, CHAS)
  • State unemployment data
  • Code enforcement records

To add alternate data source, go to AD-25 Screen and enter the source information
# Elements of the Template

## Additional Elements

<table>
<thead>
<tr>
<th>Demographics</th>
<th>Base Year: 2000</th>
<th>Most Recent Year: 2016</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>2888418</td>
<td>2898292</td>
<td>8</td>
</tr>
<tr>
<td>Households</td>
<td>1038940</td>
<td>1115858</td>
<td>7</td>
</tr>
<tr>
<td>Median Income</td>
<td>57017</td>
<td>53571</td>
<td>-6</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Data Source:</th>
<th>Displayed</th>
<th>Used in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Default Data</td>
<td></td>
<td>2000 Census (Base Year), 2009-2013 ACS (Most Recent Year)</td>
</tr>
<tr>
<td>Alternate Data</td>
<td></td>
<td>2016 ACS Data</td>
</tr>
</tbody>
</table>

Notes:

- Add IS: Data, Add GIS Data, Add JPEG, Add Text, Add Table
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

https://gov.ecfr.io/cgi-bin/ECFR
Review and Submit

- AD-25 Administration Screen

Consolidated Plans
Quality Checks Results

- Error, SP-10: No Geographic Priorities designated.
- Error, SP-40: No Organizations designated as part of the institutional delivery structure.
- Error, SP-45: No Strategic Plan Goals specified.
- Warning, AD-25: Attributes for [Public Housing Data] survey instrument are blank.
- Warning, PR-10: No Consulting Organizations designated.
- Warning, PS-05: One or more Executive Summary fields are blank.
- Warning, PR-05: Contract information missing for one or more CPG programs.
- Warning, PR-10: Cooperation and coordination between state and local government is blank.
- Warning, NA-05: Needs Assessment Overview is blank.

Status: Open in Progress
Status changed on: Thu, Mar 14 2013 at 12:51:09 PM EDT

Save and Return | Cancel
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
  1. National Broadband map created by the National Telecommunication and Information Administration (NTIA) of the Dept of Commerce
  2. Broadband availability data in Federal Communications Commission (FCC) Form 477

• Goals and Projects
  o No actions mandated
  o 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
  1. 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
  o No actions mandated
  o 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)
  o Public Housing Agencies and their residents
  o Business community

• Determining Needs and Setting Priorities (CFR 91.205, 91.305, 91.215 and 91.315)
  o 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)
  o Highlighting Revitalization & Economic Empowerment Efforts
  o Identify Public Housing Priorities and Objectives
  o 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,
  - location(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) OR 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
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:

Strategic Plan and Action Plan
Action Plan Relationship to Con Plan

- Consolidated Plan
  - SP-45 Goals
- Annual Action Plan
  - AP-20 Goals
- Annual Action Plan
  - AP-35 Projects
- IDIS
  - Activities
- CAPER
Alignment GOIs

- **SP Goal:** Rehabilitate existing housing stock in Neighborhood x. GOI: 200 HO units rehabbed
- **AP Goal:** Rehabilitate existing housing stock in Neighborhood x. GOI: 40 HO units rehabbed
- **Project:** Homeowner Rehab GOI: 40 units rehabbed
- **Activity:** 53 Main St Rehab Matrix Code #14A
PROJECT SET-UP
Project Set Up

AP-35 Projects screen of the AAP

Projects section in IDIS
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**

### Annual Goals Supported
- Eliminate Slum and Blight
- Further Fair Housing
- Improve Public Facilities
- Improve Public Infrastructure
- Improve Quality of Life
- Provide Affordable Housing for Homeowners
- Provide Affordable Housing for Renters
- Serve Homeless Families and Reduce Homelessness
- Spur Economic Development

### Priority Needs Addressed
- Increasing Affordable Housing
- Improving Public Facilities and Infrastructure
- Reducing Homelessness

### Goal Outcome Indicators

<table>
<thead>
<tr>
<th>No.</th>
<th>Goal Outcome Indicator</th>
<th>Quantity</th>
<th>Unit of Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit</td>
<td>500</td>
<td>Persons Assisted</td>
</tr>
<tr>
<td>2</td>
<td>Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit</td>
<td></td>
<td>Households Assisted</td>
</tr>
<tr>
<td>3</td>
<td>Public service activities other than Low/Moderate Income Housing Benefit</td>
<td></td>
<td>Persons Assisted</td>
</tr>
<tr>
<td>4</td>
<td>Public service activities for Low/Moderate Income Housing Benefit</td>
<td></td>
<td>Households Assisted</td>
</tr>
<tr>
<td>5</td>
<td>Facade treatment/business building rehabilitation</td>
<td></td>
<td>Business</td>
</tr>
</tbody>
</table>

*Streamline CAPER data by selecting only one annual goal*

*Use the same GOIs that were used for the associated goal*
Project Details

Note: The “Sort” number is not the IDIS Project ID.

As soon as the Project is created and added to the AP-35 screen, that Project is automatically added in IDIS.

<table>
<thead>
<tr>
<th>Sort*</th>
<th>Project Title</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Public Facilities-Community Center Improvements</td>
<td>View</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Program Year</th>
<th>IDIS Project ID</th>
<th>Grantee/PJ Project ID</th>
<th>Project Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>1</td>
<td>43-50203</td>
<td>Public Facilities-Community Center Improvements</td>
</tr>
<tr>
<td>2017</td>
<td>2</td>
<td>43-50200</td>
<td>Public Facilities: Park/Pool Improvements</td>
</tr>
</tbody>
</table>
Creating a New Year 2-5 Annual Action Plan
Let’s 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
• Click “Copy”
How to Copy your Action Plan
How to Copy your Action Plan

Enter source year and version

Enter new PY and Version
Create New AAP

• Click “Add” Action Plan
• Enter Program Year
• Associate with current Consolidated Plan
# How to Create New AAP

## Activity

**Search Activities**

<table>
<thead>
<tr>
<th>Search Criteria</th>
<th>IDIS Project ID:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program:</td>
<td></td>
</tr>
<tr>
<td>Activity Name:</td>
<td></td>
</tr>
<tr>
<td>Program Year:</td>
<td></td>
</tr>
<tr>
<td>Grantee/PJ Activity ID:</td>
<td></td>
</tr>
</tbody>
</table>

**Search**  |  **Reset**

## Project

- Add
- Search
- Copy

## Consolidated Plans

- Add
- Copy
- Search

## Annual Action Plans

- Add
- Copy
- Search
How to Create New AAP

1. Complete all fields.
2. For all grantees, select "YES".
3. Select the most current Consolidated Plan.
How to Create New AAP

Complete all fields

These fields CANNOT be edited once saved

ALL GRANTEEES SELECT YES

Select the most current Consolidated Plan
Questions???