## **DRGR Flags Quick Guide**

## Disaster Recovery Grant Reporting (DRGR) System Flags Guidance

Please submit all questions about this guidance to the DRGR Ask-A-Question (AAQ) https://www.hudexchange.info/program-support/my-question/

Flags are meant to alert CDBG-DR and NSP grantees, TA Providers and HUD Representatives of activities that are at-risk of non-compliance or contain other deficiencies requiring attention or correction. HUD will continue to add additional flags over time. The following guidance has been developed to resolve Flags in DRGR.

**Version 2.0 Update:** Includes the addition of housing performance, financial, at-risk and HUD Representative specific flags. Review the updated quidance table below.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
1	Activity end date has passed but activity not completed	CDBG-DR NSP TA	Action Plan  — Activity	Activity with Activity Status of Underway has a Projected Activity End Date that has passed.	<ol> <li>Edit Projected Activity End Date to reflect new date the activity is expected to be completed; and</li> <li>Enter Action Plan Submission Comments to explain reason for the delay;</li> <li>Or</li> <li>Change the Activity Status to Complete, if appropriate.</li> </ol>	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with grantee to ensure timely expenditure of funds.</li> </ol>
2	Activity underway with no drawdowns in 180 days	CDBG-DR NSP TA	Action Plan – Activity	Activity with Activity Status of Underway, and:  1. Has at least one Drawdown; 2. Is not fully drawn; And 3. No additional Drawdowns within the last 180 days.	1. Reduce Activity Budget to match Drawdowns if no additional Drawdowns will be made;  Or  2. Create a Drawdown if an eligible expenditure exists; and enter QPR Submission Comments to explain reason for delay;  Or  3. Enter Flag Remediation Comments to explain reason for delay.	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with grantee to ensure timely expenditure of funds.</li> </ol>

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
3	Activity underway with no drawdowns in two years	CDBG-DR NSP TA	Action Plan  — Activity	Activity with Activity Status of Underway, and:  1. Has at least one Drawdown; 2. Is not fully drawn; And 3. No additional Drawdowns within the last two years.	1. Reduce Activity Budget to match Drawdowns if no additional Drawdowns will be made;  Or  2. Create a Drawdown if an eligible expenditure exists; and enter QPR Submission Comments to explain reason for delay;  Or  3. Enter Flag Remediation Comments to explain reason for delay.	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with grantee to ensure timely expenditure of funds.</li> </ol>
4	Admin cap exceeded	CDBG-DR NSP	Action Plan – Activity	The cumulative sum of Activity Budgets with the Administration Activity Type exceeds the allowable cap.  • CDBG-DR: 5% of Grant Award + Estimated PI • NSP: 10% of Grant Award + Estimated PI	Reduce <u>Activity Budget(s)</u> with the <u>Administrative Activity Type</u> so that the cap is not exceeded.	Ensure the grantee has not proposed Activity Budgets that will result in exceeding the Admin cap.

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5	Admin + Planning cap exceeded	CDBG-DR	Action Plan – Activity	The cumulative sum of Activity Budgets with the Administration and Planning Activity Types exceeds the allowable 20% cap (up to 5% for administration + 15% for planning activities).	Reduce Activity Budget(s) with the Administration and Planning Activity Types so that the cap is not exceeded.	Ensure the grantee has not proposed <u>Activity Budgets</u> that will result in exceeding the Admin + Planning cap.
6	Public Service cap exceeded	CDBG-DR	Action Plan  – Activity	The cumulative sum of Activity Budgets with the Public Service Activity Type exceeds the allowable 15% cap.	Reduce <u>Activity Budget(s)</u> with the <u>Public Service Activity Type</u> so that the cap is not exceeded.	Ensure the grantee has not proposed <u>Activity Budgets</u> that will result in exceeding the Public Service cap.
7	Environmental review status not selected	CDBG-DR NSP	Action Plan  – Activity	The activity  Environmental Review  Status is not selected.	Edit the <u>Activity</u> and select an <u>Environmental Review Status</u> .	Review the <u>Action Plan – Activity</u> and ensure the appropriate <u>Environmental Review Status</u> is selected.

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8	QPR not submitted by deadline	CDBG-DR NSP TA	QPR	The QPR was not submitted by the required deadline.  • CDBG-DR, TA and NSP1&3: QPRs due within 30 days after the end of each quarter.  • NSP2: QPRs due within 10 days after the end of each quarter.	<ol> <li>Complete and <u>Submit</u> the QPR; and</li> <li>Enter <u>QPR Submission</u> <u>Comments</u> to explain reason for the delay.</li> </ol>	<ol> <li>Review the QPR and reason for delay.</li> <li>Note the late QPR submission and take appropriate action for repeated late submissions.</li> </ol>
9	Activity fully drawn and no accomplishments	CDBG-DR NSP	QPR	Activity Drawdowns equal Activity Budget, but no Accomplishments have been reported in the QPR.	<ol> <li>Enter activity <u>Accomplishments</u> in the <u>QPR – Activity</u>;         Or     <li>Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for delay (e.g., Housing New Construction completed but not yet leased).     </li> </li></ol>	1. Carefully review the    Accomplishments entered or    the Flag Remediation    Comments describing the    reason accomplishments are    not yet entered.  2. Work with grantee to ensure    timely expenditure of funds.
10	Activity expenditures exceed draws by more than 10%	CDBG-DR NSP TA	QPR	Cumulative activity  Expenditures exceeds activity <u>Drawdowns</u> by 10% or more.	<ol> <li>Correct <u>Drawdowns</u> or <u>Expenditures</u>, if appropriate; <b>Or</b></li> <li>Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason <u>Expenditures</u> exceeds <u>Drawdowns</u> (e.g. Lump Sum draw approved.)</li> </ol>	Review QPR activity Expenditures or Flag Remediation Comments to ensure the grantee is not drawing funds in advance of need.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
11	Unit Type: Missing Multi-Family or Single-Family Housing Projections	CDBG-DR	Action Plan  — Activity	Activity with Housing Activity Type missing structure type (Multi- Family or Single- Family) performance projections.	Edit the activity and enter applicable structure type, ( <u>Multi-Family</u> or <u>Single-Family</u> ), housing performance projections.	Review the <u>Action Plan – Activity</u> and ensure the appropriate structure type projections were entered.
12	Tenure: Missing Owner or Renter Housing Projections	CDBG-DR	Action Plan – Activity	Activity with Housing Activity Type missing tenure type (Owner or Renter) performance projections.	Edit the activity and enter applicable tenure type, ( <u>Owner</u> or <u>Renter</u> ), housing performance projections.	Review the Action Plan – Activity and ensure the appropriate tenure type projections were entered.
13	Households: Reported Housing Units does not match Household accomplishments	CDBG-DR	QPR	Activity with reported Housing Units does not equal the number of reported Households.	1. Enter or edit activity  Households reported in the  QPR – Activity;  Or  2. Enter Flag Remediation  Comments to explain reason for delay.	<ol> <li>Carefully review reported         Housing Units and         Households entered or the         Flag Remediation Comments         describing the reason         accomplishments are not yet entered.     </li> <li>Work with grantee to ensure</li> <li>Accomplishments are entered correctly in following quarters.</li> </ol>

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
14	Unit Type: Reported Housing Units does not match Single Family or Multi- Family Units accomplishments	CDBG-DR	QPR	Activity with reported Housing Units does not equal the sum of reported units by Unit Type (Single-Family or Multi-Family)	<ol> <li>Enter or edit activity <u>Unit Type</u>         (Single-Family or Multi-Family) reported in the QPR – Activity;         Or     </li> <li>Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for delay.</li> </ol>	<ol> <li>Carefully review reported         <ul> <li>Housing Units and Unit Type</li> <li>entered or the Flag</li> <li>Remediation Comments</li> <li>describing the reason</li> <li>accomplishments are not yet entered.</li> </ul> </li> <li>Work with grantee to ensure Accomplishments are entered correctly in following quarters.</li> </ol>
15	Tenure Type: Reported Households does not match Owner or Renter accomplishments	CDBG-DR	QPR	Activity with reported  Households does not equal the sum of reported households by Tenure Type (Owner or Renter)	<ol> <li>Enter or edit activity <u>Tenure</u> <u>Type</u> (Owner or Renter)         reported in the QPR – Activity;         <b>Or</b> </li> <li>Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for delay.</li> </ol>	<ol> <li>Carefully review reported         Housing Units and Tenure         Type entered or the Flag         Remediation Comments         describing the reason         accomplishments are not yet entered.     </li> <li>Work with grantee to ensure Accomplishments are entered correctly in following quarters.</li> </ol>

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
16	Grant expenditure deadline expired (2015+ applicable CDBG-DR Grantees per FR Notice)	CDBG-DR	Grant	Grant with <u>Grant</u> <u>Status</u> of <u>Active</u> and six (6) year expenditure deadline has passed	Enter Flag Remediation Comments to explain reason for not meeting six (6) year expenditure deadline and plan for resolving flag.	1. Carefully review the  Expenditures reported or the Flag Remediation Comments describing the reason six (6) year expenditure deadline was not met by required date.  2. Work with grantee to ensure timely expenditure of funds.
17	Activity start date prior to grant execution date	CDBG-DR TA	Action Plan  — Activity	Activity with Activity Start Date before grant executed in DRGR and funds made available via LOCCS	Edit the activity and enter an appropriate Activity Start Date after grant execution date.	Review the Action Plan – Activity and ensure the appropriate Activity Start Date was entered.
18	Activity end date exceeds grant expenditure deadline  (Only for applicable grantees per FR Notice)	CDBG-DR TA	Action Plan – Activity	Activity with <u>Activity</u> <u>End Date</u> that falls after six (6) year grant expenditure deadline	Edit the activity and enter an appropriate <u>Activity End Date</u> prior to grant expenditure deadline.	Review the Action Plan – Activity and ensure the appropriate Activity End Date was entered.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
19	Project setup with no activities associated	CDBG-DR NSP	Action Plan  — Project	Project setup with funds budgeted but no activities have been associated (excluding the restricted balance project) four (4) years from grant agreement execution date	<ol> <li>Delete Project to match         Drawdowns (\$0) and no         Activity will be created;         Or     </li> <li>Create an Activity and associate to Project if an approved applicable Activity exists; and enter Action Plan Submission         Comments to explain reason for addition;         Or     </li> <li>Enter Flag Remediation         Comments to explain reason for no activity association.     </li> </ol>	<ol> <li>Carefully review action taken or reasons for no activity association at Project level.</li> <li>Work with grantee to ensure projects and activities are setup correctly and timely expenditure` of funds.</li> </ol>
20	Timely Expenditure of Funds Deadline – Three (3) year check (Only for applicable grantees per FR Notice)	CDBG-DR TA	Grant – At-Risk	Three (3) years into grant and not 50% drawn – grant timeliness check.	Enter Flag Remediation Comments to explain reason for slow spending and plan for meeting applicable expenditure deadline.	<ol> <li>Carefully review Expenditures and reason for delay in drawing funds 50% of funds three (3) years prior to grant expenditure deadline.</li> <li>Work with grantee to ensure timely expenditure of funds.</li> </ol>
21	Timely Expenditure of Funds Deadline – Four (4) year check (Only for applicable grantees per FR Notice)	CDBG-DR TA	Grant At-Risk	Four (4) years into grant and not 75% drawn - – grant timeliness check.	Enter Flag Remediation  Comments to explain reason for slow spending and plan for meeting applicable expenditure deadline.	1. Carefully review Expenditures and reason for delay in drawing funds 75% of funds two (2) years prior to grant expenditure deadline.  2. Work with grantee to ensure timely expenditure of funds.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
22	Timely Expenditure of Funds Deadline – Five (5) year check (Only for applicable grantees per FR Notice)	CDBG-DR TA	Grant – At-Risk	Five (5) years into grant and not 90% drawn - – grant timeliness check.	Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for slow spending and plan for meeting applicable expenditure deadline.	1. Carefully review Expenditures and reason for delay in drawing funds 90% of funds one (1) year prior to grant expenditure deadline.  2. Work with grantee to ensure timely expenditure of funds.
23	Grant not fully budgeted	CDBG-DR TA	Grant – Budget	Three (3) years before grant execution date and grant not fully budgeted.	<ol> <li>Enter <u>Activity Budgets</u> on the <u>Action Plan – Activity</u> screens to fully budget grant;         Or</li> <li>Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for delay (e.g., pending Action Plan amendment approval).</li> </ol>	1. Carefully review the Activity Budgets entered or the Flag Remediation Comments describing the reason for delay.  2. Work with grantee to ensure timely expenditure of funds.
24	Grant not fully obligated	CDBG-DR TA	Grant - Obligations	Four (4) years after grant execution date and grant not fully obligated.	1. Enter Activity Obligations on the Financial — Obligation screen to fully obligate grant;  Or  2. Enter Flag Remediation Comments to explain reason for delay (e.g., pending Action Plan amendment approval).	1. Carefully review the Activity Budgets entered or the Flag Remediation Comments describing the reason for delay. 2. Work with grantee to ensure timely expenditure of funds.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
25	Overall Benefit Requirement – 50% drawn check (per applicable Federal Register Notice)	CDBG-DR	Grant – At-Risk	Grantee 50% drawn and not at 50% or more towards meeting overall benefit requirement	Enter Flag Remediation Comments to explain reason for slow spending and plan for meeting Overall Benefit Requirement per applicable Federal Register Notice.	1. Carefully review Expenditures and explanation of 50% drawn in expenditures and plan for meeting Overall Benefit Requirement.  2. Work with grantee to ensure timely expenditure of funds.
26	Overall Benefit Requirement – 75% drawn test (per applicable Federal Register Notice)	CDBG-DR	Grant – At-Risk	Grantee 75% drawn and not at 75% or more towards meeting overall benefit requirement	Enter Flag Remediation Comments to explain reason for slow spending and plan for meeting Overall Benefit Requirement per applicable Federal Register Notice.	1. Carefully review Expenditures and explanation of 75% drawn in expenditures and plan for meeting Overall Benefit Requirement.  2. Work with grantee to ensure timely expenditure of funds.
27	Overall Benefit Requirement – 100% drawn test (per applicable Federal Register Notice)	CDBG-DR	Grant- At-Risk	Grant fully drawn and grantee has not met overall benefit requirement (50%, 70%, wavier reductions – per applicable Federal Register Notice).	Enter <u>Flag Remediation</u> <u>Comments</u> to explain reason for slow spending and why <u>Overall Benefit Requirement</u> per applicable <u>Federal Register</u> Notice was not met (e.g., waiver request approved to lower overall benefit requirement).	1. Carefully review Expenditures and reason for not meeting Overall Benefit Requirement.  2. Work with grantee to ensure plan for meeting Overall Benefit Requirement is appropriate for applicable expenditure deadline.

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
29	Most Impacted and Distressed (MID) Budget Requirement – Activity test  Most Impacted and Distressed (MID) Budget Requirement Check- Grant test	CDBG-DR	Action Plan – Activity  Grant	QPR – Activity Most Impacted and Distressed (MID) Expenditures reported do not match MID Budget projection in Action Plan - Activity and Activity has Activity Status of Completed.  Total Action Plan – Activity MID Budgets do not equal grant level requirement for all grant activities setup, once grant is	1. Enter or update MID Budget in the Action Plan - Activity to match reported activity MID expenditures;  Or  2. Enter Flag Remediation Comments to explain reason for discrepancy.  1. Enter or update MID Budgets in applicable Action Plan - Activities to match reported activity MID expenditures;  Or  2. Enter Flag Remediation Comments to explain reason	1. Carefully review the Activity MID Budgets entered or the Flag Remediation Comments describing the reason for discrepancies.  2. Work with grantee to ensure timely expenditure of funds and applicable Federal Register Notice requirements are met.  1. Carefully review the Activity MID Budgets entered or the Flag Remediation Comments describing the reason for delay.  2. Work with grantee to ensure MID expenditure requirement
				fully budgeted.	for delay.	is met prior to grant expenditure deadline.
30	Most Impacted and Distressed (MID) Requirement - Grant Fully Drawn test (per applicable Federal Register Notice)	CDBG-DR	Grant	Grant fully drawn and Most Impacted and Distressed (MID) budget requirement has not been met.	<ol> <li>Enter or update MID Budgets in applicable Action Plan -         <u>Activities</u> to match reported activity MID expenditures;         Or     </li> <li>Enter Flag Remediation         <u>Comments</u> to explain reason for any discrepancies.</li> </ol>	<ol> <li>Carefully review the Activity         <u>MID Budgets</u> entered or the         <u>Flag Remediation Comments</u>         describing the reason for         discrepancies.</li> <li>Work with grantee to ensure         timely expenditure of funds         and applicable Federal Register         Notice requirements are met.</li> </ol>

#	Flag	Program	Flag Level	Condition	Grantee Action	HUD Action
30	HUD Representative Specific Flag: Grant has Restricted Balance remaining (four) 4 years after grant execution date	CDBG-DR TA	HUD only At-Risk	Restricted Balance project has funds budgeted four (4) years from grant agreement execution date	No immediate grantee action required.	HUD Representative will work with grantee to resolve flag or ask grantee to enter <u>Flag</u> Remediation Comments.
31	HUD Representative Specific Flag: Grant Blocked	CDBG-DR TA	HUD only At-Risk	Grant blocked after grant execution date	No immediate grantee action required.	HUD Representative will work with grantee to resolve flag or ask grantee to enter <u>Flag</u> Remediation Comments.
32	HUD Representative Specific Flag: Activity Blocked	CDBG-DR TA	HUD only At-Risk	Activity blocked after four (4) years after grant execution date	No immediate grantee action required.	HUD Representative will work with grantee to resolve flag or ask grantee to enter <u>Flag</u> Remediation Comments.
33	TA Work Plan Expired and Not Closed in 30-90 Days	TA	Activity/ TA Work Plan	Generates for  Modified or Approved work plans, after the 30th day following the work plan end date (days 31 to 90)	<ol> <li>Edit TA work plan, ensure work plan is compliant, and then change work plan status to Closed.         Or     </li> <li>Enter Flag Remediation Comments to explain reason for delay.</li> </ol>	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with TA Provider to ensure timely closure of future work plans.</li> </ol>
34	TA Work Plan Expired and Not Closed in 90+ Days	ТА	Activity/ TA Work Plan	Generates for  Modified or Approved work plans, after the 90th day following the work plan end date (days 91+)	<ol> <li>Edit TA work plan, ensure work plan is compliant, and then change work plan status to Closed.         Or     </li> <li>Enter Flag Remediation Comments to explain reason for delay.</li> </ol>	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with TA Provider to ensure timely closure of future work plans.</li> </ol>

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35	No drawdowns between 30-90 days	ТА	QPR	Work plans with Activity Status of Underway,  Or  Work Plan Status of Approved or Modified and:  1. Is not fully drawn; And 2. No additional Drawdowns within the last 30-90 days.	1. Reduce Work Plan Budget to match Drawdowns if no additional Drawdowns will be made;  Or  2. Create a Drawdown if an eligible expenditure exists; and enter QPR Submission Comments to explain reason for delay;  Or  3. Enter Flag Remediation Comments to explain reason for delay.	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with TA Provider to ensure timely expenditure of funds.</li> </ol>
36	No drawdowns over 90 days	TA	QPR	Work plans with Activity Status of Underway, or Work Plan Status of Approved or Modified and:  1. Is not fully drawn; And 2. No additional Drawdowns within the last 91 days or more.	1. Reduce Work Plan Budget to match Drawdowns if no additional Drawdowns will be made;  Or  2. Create a Drawdown if an eligible expenditure exists; and enter QPR Submission Comments to explain reason for delay;  Or  3. Enter Flag Remediation Comments to explain reason for delay.	<ol> <li>Review action taken and reasons for delay.</li> <li>Work with TA Provider to ensure timely expenditure of funds.</li> </ol>