



December 29, 2021

Anna P. Guido  
Reports Management Officer, QMAC  
Office of the Chief Information Officer  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW  
Washington, DC 20410

RE: Docket No. FR-7034-N-66; OMB Control No: 2506-0117

Dear Ms. Guido:

On behalf of the members of the National Community Development Association (NCDA), we welcome this opportunity to comment on the collection of information for the Consolidated Plan, Annual Action Plan, and Annual Performance Report. NCDA is a bi-partisan national organization comprised of nearly 500 local government grantee members across the country that administer Department of Housing and Urban Development programs, including the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG) Program, and the Housing for Persons with AIDS (HOPWA) Program.

We strongly urge HUD to begin a long overdue rethink of the information collection for the Consolidated Plan, Annual Action Plan, and Annual Performance Report (CAPER). While we applaud HUD's incorporation of the production, submission, and review of these documents through the on-line Integrated Disbursement and Information System (IDIS), many grantees find the information collection extremely burdensome and IDIS obsolete. More importantly, as the amount of data collected by HUD has increased, the documents have become less useful in informing the public about the grantee's plans, the use of the funds and the grantee's accomplishments. This is especially true for grantees receiving only small amounts of the covered HUD funds. We recommend that HUD adjust the Con Plan, Action Plan and CAPER templates according to the size and nature of the grantee (small, mid-sized and larger grantees) as well as by the type of grantee (multi-community urban counties, single community entitlement grantees). Similarly, we recommend that IDIS be improved to allow grantees to produce and download separate, more streamlined, and reader-friendly versions of just the essential elements of the Con Plan, Action Plan and CAPER for the purpose of public review and comment. Much of the detailed information in the current downloaded documents is primarily only of interest to HUD for its compliance review purposes and is not relevant to the public.

### **Ways to Enhance the Quality, Utility, and Clarity of the Information to be Collected**

#### **General Comments Applicable to All eConPlan Documents**

We recommend HUD make the following small fixes to the eConPlan system to enhance its use and efficiency.

1. The function in the eConPlan for adding new tables to any of the documents is very cumbersome. This has been a long-standing problem that should be addressed by HUD. A more-user friendly function to generate tables would significantly improve the ability of grantees to include and display relevant data in an easier to understand manner.
2. IDIS automatically signs grantees out of the system when it perceives even relatively short periods of inactivity and then it has a delay before a user can sign in again. This is especially problematic for staff working on complicated documents such as the Con Plan, Action Plan and CAPER. The system should be adjusted to prompt the user to indicate whether they are still working prior to signing them out of IDIS.
3. Certain functions required by the eConPlan system do not work with some of the most popular browsers. For example, grantees report that you cannot add attachments if you are using Mozilla Firefox. HUD should ensure that the eConPlan system's functionality is compatible with a wider range of browsers.

**Ways to Minimize the Burden of the Collection of Information on Those Who are to Respond; Including Through the Use of Appropriate Automated Collection Techniques or Other Forms of Information Technology (e.g., permitting electronic submission of responses)**

**General Comments**

The Citizen Participation requirements should be reviewed and updated to recognize changes in the way people now get their information. We recommend that the requirement to publish notices in newspapers be eliminated. Many communities no longer have a local newspaper. Advertisements and legal notices in newspapers are costly and reach few people. Grantees should be allowed to satisfy the notice requirements by e-mail, social media and posting on their websites.

**Consolidated Plan (Con Plan)**

For small grantees, most of the data and analysis required by the Consolidated Plan is extremely burdensome and not particularly relevant to informing the public about how the grantee plans to use the limited amount of funds it will receive from HUD. Based on FY20 allocations, about 640 (54%) of HUD's approximately 1200 entitlement grantees received less than \$1 million in CDBG funds. Another 307 (25%) received CDBG allocations between \$1 million and \$2 million. We recommend providing a separate template for such small grantees with reduced Con Plan data and narratives. In addition, to satisfy the citizen participation requirements, most grantees use the Word download function in IDIS to create a version of the Con Plan to be made available for public comment. This generally requires hours of formatting and editing to create a readable document. For small grantees, much of the data, tables and exhibits is not relevant to the grantee or the public. We recommend that HUD enable grantees to select just those tables and narratives to download that are either required by regulation or that the grantee otherwise finds useful. The template should clearly identify which narratives, etc. are required for the submission to HUD and the subset that a grantee must include in the drafts for public comment.

The Con Plan is redundant, seeking information about the same topic multiple times. To provide greater efficiency for grantees, HUD should list all the questions on the same topic together in one section rather than dispersing the same question throughout multiple sections of the document.

**Annual Action Plan (AAP)**

NCDCA recommends that HUD provide a separate template for small grantees with reduced AAP exhibits and narratives. This should focus on just those priorities that the grantee has identified, set goals for, and adopted specific actions in the strategic plan.

**Annual Performance Report (CAPER)**

As the amount and complexity of the data required by the CAPER has grown over time, it is becoming increasingly difficult for grantees to meet the requirement to submit the CAPER within 90 days of the end of the grantee's program year, even with the shorter 15-day public comment period required for the CAPER. NCDCA is requesting that the deadline for submission of the CAPER be increased to 120 days. NCDCA recommends that HUD provide a separate template for small grantees with reduced CAPER exhibits and narratives. The CAPER should be based more closely on the format and content of the Action Plan. Elements such as the Goals in the CAPER's CR05 report (Goals and Outcomes) should be auto-filled directly from the Action Plan.

The CDBG Financial Summary Report (PR26) is cumbersome and currently must be completed separately, outside the IDIS online CAPER. This should be built directly into the CAPER and auto-filled directly from IDIS while allowing grantees to adjust and provide explanations as needed. Grantees receiving and reporting on Housing Opportunity for Persons with AIDS (HOPWA) funds are required to submit a separate HOPWA CAPER to HUD's Special Needs unit for review in addition to submitting HOPWA data in the regular CAPER. HUD should eliminate this two-tier submission process and integrate all HOPWA submission requirements into the regular CAPER.

Grantees receiving Emergency Solutions Grant (ESG) funds are required to have subgrantees upload data through a separate electronic system (SAGE). The process of reviewing and uploading data into SAGE is time-consuming and the data is of interest mainly to HUD. HUD should enable SAGE data to be electronically transferred directly into IDIS and for the necessary ESG CAPER tables to be auto populated from the SAGE data.

Thank you for the opportunity to provide comments on the collection of information for the Con Plan, Annual Action Plan, and CAPER. NCDCA stands ready to work with HUD to improve these documents to make them less burdensome for grantees and more useful to the public.

Sincerely,



Vicki Watson  
Executive Director