CDBG Changes in IDIS Instructions for Grantees
IDIS Release 11.4

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Introduction

On October 31, 2011, the Inspector General for the U. S. Department of Housing and Urban Development issued an audit that found that the CDBG program needed to increase its use of IDIS to improve oversight of CDBG activities. The audit particularly focused on the need to improve oversight of:

- Long-standing, open activities
- Cancelled activities with draws
- Draws revised from one activity to another

As part of its response to the audit, the CDBG program has implemented changes in IDIS to assist grantees and field offices in preventing activities from remaining open with no action for long time periods, reducing the number of activities that are cancelled with draws, and providing explanations for revised draws. This document provides instructions to grantees for responding to these changes in an accurate, comprehensive, and timely manner and identifies the steps grantees need to take once a Remediation Plan or cancelled with draws request has been approved or disapproved by the field office.

The new system changes flag and require justifications by grantees and field office approval for:

- Activities that have had no draws for a year
- Activities that have not reported accomplishments for three years
- Activities that have 80 percent of their funding amount disbursed and no accomplishments reported
- Activities that grantees request to cancel with draws

Revised draws will require justifications by grantees but do not require field office approval.

Understanding the Process

Long-standing Open Activities

The CDBG program will identify at-risk activities via a banner when the grantee logs into IDIS. This banner is the same as is currently in use by the HOME program. The banner will indicate how many of the grantee's activities have been flagged for action. Grantees will click on the banner and be taken to the Review Activities screen which lists activities that have had no draws for a year, that have not reported accomplishments in three years, and that have 80 percent of their funding amount disbursed with no accomplishments.

For each activity listed under these categories, grantees will be asked to explain the Reasons for the Delay, provide an Action Plan for resolving the delay, and provide a date within six months by which these actions will be taken. Together this information is called the Remediation Plan.

Field offices will either approve or disapprove Remediation Plans. If disapproved, IDIS will send an email to grantees asking them to complete the activity or cancel the activity and reimburse their line of credit or local program account for all drawn funds. On or before the Expected Completion Date of the remediation actions, grantees must return to the Review Activities screen to confirm that the actions described in their Remediation Plan have been successfully carried out. If grantees

do not confirm that the actions have been taken, IDIS will send an email requesting the grantee to either complete the activity or cancel the activity and reimburse all drawn funds.

Pending At-Risk Activities

The Review activities screen will also identify activities that are due to be flagged within three months, so that grantees can take action prior to appearing on the at-risk lists. Grantees can act on the pending activities now, to avoid the extra work of providing reasons for delay and remediation actions.

Cancelling an Activity with Draws /Revising Draws to Another Activity

Grantees will also encounter changes in IDIS when attempting to cancel an activity with draws or revising draws from one activity to another. **Activities may no longer be canceled with draws without field office approval.** A justification will be required when grantees attempt to change the status of an activity with draws from open to cancelled. These requests will be sent to the field office, and the field office will approve or disapprove the requests in IDIS. If disapproved, grantees will receive an email from IDIS asking them to complete the activity or cancel the activity and reimburse all drawn funds.

When revising draws to another activity, grantees will now need to enter a justification for doing so. HUD Field office staff will review grantees' justifications, but no field office approval is required.

Grantee Access and Response Time

All grantee personnel that have Edit privileges in IDIS will be allowed to enter the responses required by these changes. Of course, grantees may further restrict the staff they allow to do so.

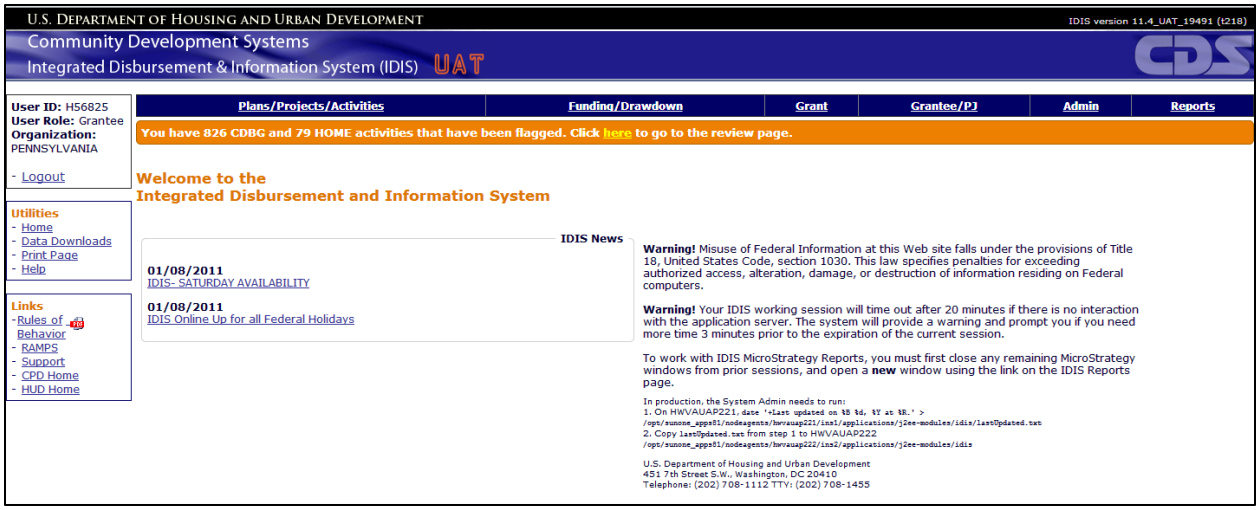
Grantees that have previously gone into IDIS infrequently will need to go into IDIS more regularly to check the states of at-risk and pending at-risk activities. A grantee that only goes into IDIS every few months runs the risk of receiving an email from IDIS asking it to cancel an activity and reimburse all funds because the grantee failed to respond in timely manner to problems identified on the banner. For the first six months after this release, the required response time will be three months, with a reduction to two weeks thereafter. The initial response time is more generous due to the backlog of existing activities that will be flagged upon implementation of these changes. Some grantees will have a long list of at-risk activities identified in the first round. Field offices will have the same timeframes for approving/disapproving grantee Remediation Plans and requests to cancel activities with draws.

Using New IDIS Features for At-Risk Activities

Orange Banner at the Top of the IDIS Home Screen

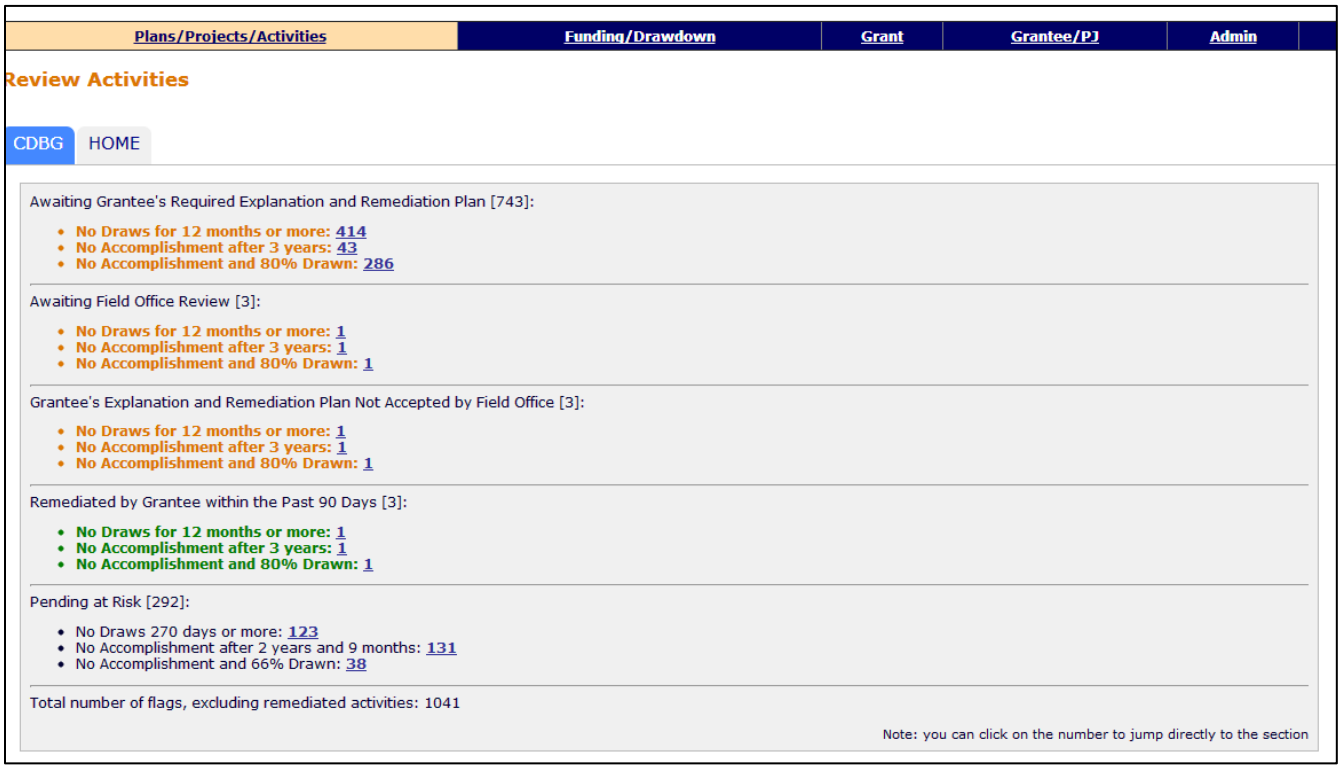
When grantees log in to IDIS, they will see an orange banner at the top of the home screen that alerts the grantee to the number of CDBG activities flagged as at-risk.[1] Clicking on this banner takes grantees to the Review Activities screen.

[1] This banner also includes HOME activities that have been flagged, but HOME activities are outside the scope of this guidance.



Review Activities Screen for At-Risk Activities

The Review Activities screen for at-risk activities includes a summary at the top of the page that lists the number of at-risk activities that are in each flagged condition and at each stage of the review and resolution process. The blue number is a link that will take grantees to the list of activities in that particular condition and stage of review.



Awaiting Grantee's Required Explanation and Remediation Plan

The summary section at the top of the Review Activities screen lists activities that have been flagged. It requires grantees to enter the reasons activities are delayed and a description of the Remediation Plan.

Activities are flagged for three reasons:

- The activity has had no draws for 12 months or longer
- The activity has been open for three years and no accomplishments have been reported
- 80% of the funded amount for the activity has been drawn down, but no accomplishments have been reported

The list of activities that require grantees to provide explanations and remediation actions has three sections, which correspond to the three reasons listed above. Activities can be flagged for more than one condition, and so may appear in more than one list. When this happens, grantees should enter the Reasons for Delay and Remediation Plan each time the activity is listed.

Awaiting Grantee's Required Explanation and Remediation Plan

[Awaiting Grantee's Required Explanation and Remediation Plan] No Draws for 12 months or more: 414

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	Public Facilities - Pumper Truck	2007/138	35308	C000029598	Explain
2	SANITARY SEWER SYSTEM	2009/432	31988	C000029404	Explain
3	Housing Rehab	2011/56	32909	C000029583	Explain
4	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	2007/237	33658		Explain
5	RECREATION	2007/236	33877	C000030018(7)	Explain
6	ADMINISTRATION	2008/56	33962	08-0056-01	Explain
7	PAUPACK TOWNSHIP	2008/28	34029	C000034150-3	Explain
8	DEMOLITION OF DELAPIDATED PROPERTIES	2008/64	34036		Explain
9	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	2008/1	34907		Explain
10	DCED SECTION 108 UNPLANNED LOAN LOSS	2008/1	34909		Explain
11	CORNPLANTER TOWNSHIP SEWER	2008/155	34990	3	Explain
12	FIRE FIGHTING EQUIPMENT (NEW HAVEN HOSE)	2008/53	35374	C00003591-06	Explain
13	FC BELLE VERNON WATERLINE	2008/255	35461	08-762-0216200	Explain
14	FC SPRINGFIELD TWP WATERLINE	2008/255	35462	08-762-0276200	Explain
15	FC DAWSON BOROUGH STORM	2008/255	35463	08-762-0236600	Explain
16	FC DUNBAR BROUGH LIBRARY	2008/255	35466	08-762-0246900	Explain
17	FC BROWNSVILLE BOROUGH STREETS	2008/255	35468	08-762-0226100	Explain
18	DUNBAR TWP STREETS	2008/255	35472	08-762-0036100	Explain
19	REDSTONE TWP STREETS	2008/255	35479	08-762-0116100	Explain
20	SOUTH UNION TWP ECO DEVELOPMENT	2008/255	35482	08-762-0126800	Explain
21	2008 WASHINGTON TWP SANITARY	2008/255	35483	08-762-0136600	Explain
22	WHARTON TWP STREETS	2008/255	35484	08-762-0146100	Explain
23	HOUSING REHAB	2008/219	35579		Explain
24	PROGRAM ADMINISTRATION	2008/219	35580		Explain
25	TEMPLETON LATERALS/HOUSING REHAB PROJ.	2008/252	35623		Explain
26	STREET RECONSTRUCITON	2008/44	35663	2008-01	Explain
27	ADMINISTRATION	2008/246	35927	C000036745-1	Explain
28	ADMINISTRATION	2008/256	36051		Explain
29	FIRE EQUIPMENT - CITY FIRE DEPARTMENT	2008/53	36099	C000035951-05	Explain
30	SENIOR CITIZEN CENTER	2008/53	36101	C00003591-02	Explain

Awaiting Field Office Review

The summary section at the top of the Review Activities screen also lists activities that are waiting field office review. After grantees enter the Reasons for Delay and the Remediation Plan for an activity, the field office is prompted to review this information and approve or disapprove the Remediation Plan. This section lists activities by the three conditions that flag activities as at-risk.

Between the time grantees complete a Remediation Plan and the field office approves or disapproves the plan, grantees may edit the information entered in the Reasons for Delay and the Remediation Plan by clicking on the blue "Edit" link.

After the field office approves or disapproves, grantees may not make any changes to the Reasons for Delay and the Remediation Plan, including the Expected Completion Date. Therefore, the grantee may want to consult with its field office regarding their plan to ensure that the timeline and actions it enters into the system are reasonable.

Awaiting Field Office Review

[Awaiting Field Office Review] No Draws for 12 months or more: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	2006/222	32015	C000026560	Edit

[Awaiting Field Office Review] No Accomplishment after 3 years: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	housing rehabilitation	2009/88	36438		Edit

[Awaiting Field Office Review] No Accomplishment and 80% Drawn: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	FIRETRUCK LEASE PUBLIC FACILITY	2007/90	33203	2007-01	Edit

Grantee's Explanation and Remediation Plan Not Accepted by Field Office

The summary section at the top of the Review Activities screen lists activities that have Remediation Plans that field offices have disapproved. This section lists activities by the three conditions that flag activities as at-risk.

Grantee's Explanation and Remediation Plan Not Accepted by Field Office

[Grantee's Explanation and Remediation Plan Not Accepted by Field Office] No Draws for 12 months or more: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	WATER IMP CUMBERLAND TWP CDBG 2008	2008/174	35106	C000036549	View

[Grantee's Explanation and Remediation Plan Not Accepted by Field Office] No Accomplishment after 3 years: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	Code Enforcement-413.1	2009/42	36393	42	View

[Grantee's Explanation and Remediation Plan Not Accepted by Field Office] No Accomplishment and 80% Drawn: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	NEW KEN 11 CODE ENFORCEMENT	2011/104	41846	C000052194-004	View

Once a field office rejects a Remediation Plan, IDIS will send an email to the grantee requesting them to complete the activity or cancel the activity and reimburse all drawn funds. This rejection action, when taken by a field office, is irreversible in IDIS. Completing an activity is a valid option only if the activity meets a national objective and the grantee has entered all required data. Grantees should consult with their field office prior to making any reimbursement; whether funds should be reimbursed to the line of credit or to the grantee's local program account depends on the type and source year of funds used to fund the activity initially.

Remediated by Grantee Within the Past 90 Days

The summary section at the top of the Review Activities screen lists activities that have been successfully remediated in the preceding 90 days. These are the at-risk activities for which Remediation Plans were approved by the field office, and for which grantees have confirmed in IDIS that the remediation actions were successfully completed. This section lists activities by the three conditions that flag activities as at-risk.

Remediated by Grantee within the Past 90 Days

[Remediated by Grantee within the Past 90 Days] No Draws for 12 months or more: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	ADMIN CUMBERLAND TWP 2008 CDBG	2008/174	35104	C000036549	View

[Remediated by Grantee within the Past 90 Days] No Accomplishment after 3 years: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	CLEARANCE AND DEMOLITION	2007/138	32708	C000029598 CLEAR	View

[Remediated by Grantee within the Past 90 Days] No Accomplishment and 80% Drawn: 1

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	South Fifth Street Reconstruction (LB)	2011/181	42124		View

Pending At-Risk

These activities have not been flagged as at-risk, but will be soon. Activities on this list have had no draws for nine months, no accomplishments reported after two years and nine months, or no accomplishments after 66% of funds have been drawn. Activities in this category do not require grantee action yet, but HUD wants to make grantees aware of these activities so that grantees can address them before they are flagged.

Pending at Risk

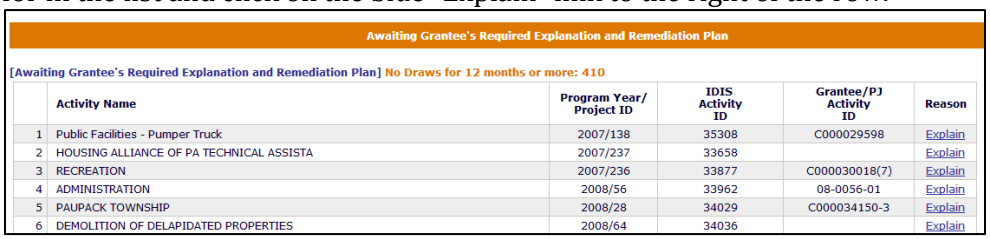
[Pending at Risk] No Draws 270 days or more: 123

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID
1	HOUSING REHABILIATION	2007/138	32707	C000029598 HOUSING
2	CLEARANCE AND DEMOLITION	2007/138	32708	C000029598 CLEAR
3	FIRE STATION REHABILITATION	2008/236	32711	C00029598
4	RECREATION	2007/144	32210	C000029573
5	CASCADE EQUIPMENT - FIRE DEPT.	2008/236	35307	C000032913 FIRE EQ
6	HOUSING REHAB SIDEWALKS	2008/216	35659	
7	AFFORDABLE HOUSING SITES	2008/246	35997	C000036745-4
8	SMITHFIELD ADMINISTRATION	2008/246	36197	C00003675-S3
9	ADMINISTRATION	2008/268	36228	
10	Clearance-Acquisition & Demolition	2009/43	36928	C000045878-06
11	General Administration	2009/38	36362	
12	Sewer Repair KMHJMA - Chestnut Street	2009/206	37128	
13	Clarks Summit Borough Housing Rehabilitation	2009/358	37346	

Submitting Reasons for Delay and Remediation Plans

To submit a Reason for Delay and Remediation Plan, grantees should perform the following procedures for each activity listed in the "Awaiting Grantee's Required Explanation and Remediation Plan" section of the Review Activities screen.

1. Find the activity that the grantee would like to enter reasons for delay and a remediation for in the list and click on the blue "Explain" link to the right of the row.

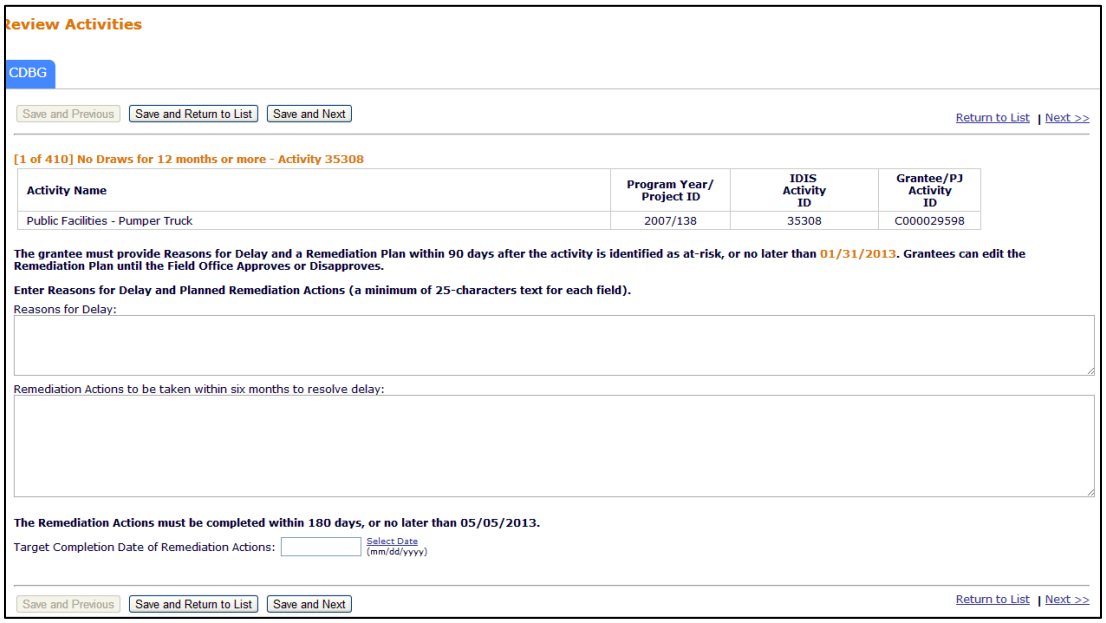


Awaiting Grantee's Required Explanation and Remediation Plan

[Awaiting Grantee's Required Explanation and Remediation Plan] No Draws for 12 months or more: 410

	Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID	Reason
1	Public Facilities - Pumper Truck	2007/138	35308	C000029598	Explain
2	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	2007/237	33658		Explain
3	RECREATION	2007/236	33877	C000030018(7)	Explain
4	ADMINISTRATION	2008/56	33962	08-0056-01	Explain
5	PAUPACK TOWNSHIP	2008/28	34029	C000034150-3	Explain
6	DEMOLITION OF DELAPIDATED PROPERTIES	2008/64	34036		Explain

2. Enter the Reasons for Delay for the activity, e.g., why the activity did not have draws for one year or does not have accomplishments. Enter the Remediation Plan or the actions to be taken to resolve the delay and ensure that the activity continues to draw available funds, report accomplishments, and meet a national objective. Select a date, no later than six months in the future, by which these remediation actions will be taken and the delay will be resolved.



Review Activities

CDBG

Save and Previous | Save and Return to List | Save and Next

Return to List | Next >>

[1 of 410] No Draws for 12 months or more - Activity 35308

Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee/PJ Activity ID
Public Facilities - Pumper Truck	2007/138	35308	C000029598

The grantee must provide Reasons for Delay and a Remediation Plan within 90 days after the activity is identified as at-risk, or no later than 01/31/2013. Grantees can edit the Remediation Plan until the Field Office Approves or Disapproves.

Enter Reasons for Delay and Planned Remediation Actions (a minimum of 25-characters text for each field).

Reasons for Delay:

Remediation Actions to be taken within six months to resolve delay:

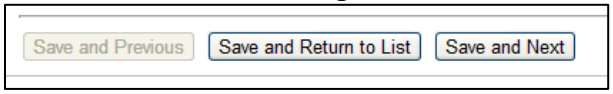
The Remediation Actions must be completed within 180 days, or no later than 05/05/2013.

Target Completion Date of Remediation Actions: Select Date (mm/dd/yyyy)

Save and Previous | Save and Return to List | Save and Next

Return to List | Next >>

3. Click "Save and Next" to save the information, submit it to the field office for review and go immediately to the next activity in the list of flagged activities. When not going on to another activity, click "Save and Return to List" to save the information, submit it to the field office for review, and go back to the list of all flagged activities on the previous screen.



Save and Previous | Save and Return to List | Save and Next

Confirming Remediation Actions Have Been Taken

Grantees must confirm that the remediation actions they identified and the field office approved have taken place. To do this, use the following steps:

1. Find the activity in the "Approved by Field Office and Awaiting Grantee's Completion of Remediation Actions" section of the review activities screen.
2. Click on the blue "Remediate" link.
3. Check the box that says "I confirm that the remediation actions described on this page have been taken."

[1 of 2] Approved by Field Office - No Draws for 12 months or more - Activity 35157

Activity Name	Program Year/ Project ID	IDIS Activity ID	Grantee Activity ID
POOL STREET	2008/79	35157	

On 11/02/2012 20:08, the Grantee entered or revised the Reasons for Delay and the Remediation Plan.

On 11/02/2012 20:28, the Field Office reviewed the Reasons for Delay and approved the Remediation Plan.
The Grantee has not confirmed the completion of the Remediation Actions.

Reasons for Delay:
We haven't had draws in 12 months because of hurricane Sandy.

Remediation Actions to be taken within six months to resolve delay:
Our remediation is to fix by tomorrow.

Target Completion Date of Remediation Actions: 11/03/2012

☐ I confirm that the Remediation Actions described on this page have been completed.

Save and Previous | Save and Return to List | Save and Next | Return to List | Next >>

If the grantee has not successfully completed its remediation actions for an at-risk activity and does not confirm that those actions have been successfully completed on or before the Target Completion Date of Remediation Actions, IDIS will send an email to requesting the grantee complete the activity or cancel the activity and reimburse its line of credit or local program account for all drawn funds.

Using the CDBG At-Risk Activities Dashboard Report — PR59

Grantees can use the new PR59 CDBG At-Risk Activities report as another way to track activities that IDIS flags as at-risk of becoming longstanding open activities. The report identifies the CDBG activities that have been flagged as at-risk, organized by at-risk category and phase of resolution process. The report also includes activities that are pending at-risk (have not yet been flagged, but will be soon), activities that have been auto-closed in the past 30 days, and activities that have "Cancel Pending" status, which grantees are required to cancel or complete because the remediation plan was disapproved.

At-Risk with Remediation Plan Pending Field Office Approval

This section of the report displays the Reasons for the Delay and the Remediation Plan submitted by grantees for their at-risk activities. These plans are ready for field office approval/disapproval. The activities are listed by at-risk factor.

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Integrated Disbursement and Information System
CDBG Activities At Risk Dashboard

Grantee: **PENNSYLVANIA**

At Risk With Remediation Plan Pending Field Office Approval

Open activities without draws for more than 12 months:

IDIS Activity	Activity	Matrix Code	Remediation Submitted	Remediation Submitted by	Expected Completion Date	Reason	Remediation Action
32015	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	19H	11/2/2012	C04004	11/3/2012	This is a sample reason.	Our remediation Actions are ....

At Risk With Remediation Plan Pending Field Office Approval

Open activities without accomplishments* for more than 3 years:

IDIS Activity	Activity	Matrix Code	Remediation Submitted	Remediation Submitted by	Expected Completion Date	Reason	Remediation Action
32711	FIRE STATION REHABILITATION	03O	8/7/2012	System	11/15/2012	Test for Ivo set up by vince	jkl;
36438	housing rehabilitation	14A	11/2/2012	C04004	11/3/2012	errrrrrrrrrrrrrrrrrrrrrrrrrrrrr rrrrrrrrrrrrrrrrrrr	eeeeeeeeeeeeeeeeeeeeeee eeeeeeeeeeeeeeeeeeeeeee ee

At Risk With Remediation Plan Pending Field Office Approval

Open activities without accomplishments* and at least 80% drawn:

IDIS Activity	Activity	Matrix Code	Remediation Submitted	Remediation Submitted by	Expected Completion Date	Reason	Remediation Action
32707	HOUSING REHABILIATION	14A	8/7/2012	System	11/25/2012	Test for Ivo set up by vince	qwerty
33203	FIRETRUCK LEASE PUBLIC FACILITY	03O	11/2/2012	C04004	11/3/2012	qqqqqqqqqqqqqqqqqqqqqq qqqqqqqqqqqqqqqqqqqqqq qqqqqq	wwwwwwwwwwwwwwwwwwww wwwwwwwwwwwwwwwwwwww wwwwwwwwwwwwwwwwwwww ww

Once field office personnel have reviewed the Reasons for the Delay and the Remediation Plan submitted by the grantee, the field office may consult with the grantee or request changes in the plan prior to approving or disapproving the Remediation Plan. The Expected Completion Date column refers to the date the grantee states that its remediation actions will be completed.

At-Risk Without Remediation Plan

Activities in this list are those for which grantees have yet to submit a Remediation Plan and require prompt action by the grantee. These activities are organized by at-risk factor.

At Risk Without Remediation Plan

Open activities without draws for more than 12 months:

IDIS Activity	Activity	Year	National Objective	Matrix Code	Fund Date	Funded Amount	Drawn Amount for last 12 mths	Balance
33028	DCED CDBG 2007 ADMIN	2007		21J	6/2/2008	$742,219.89	$0.00	$742,219.89
33658	HOUSING ALLIANCE OF PA TECHNICAL ASSISTA	2007		19H	6/2/2008	$6,200.00	$0.00	$6,200.00
33877	RECREATION	2007	LMA	03F	8/27/2009	$15,000.00	$0.00	$15,000.00
33962	ADMINISTRATION	2008		21A	8/1/2008	$152,200.00	$0.00	$1,060.00
34029	PAUPACK TOWNSHIP	2008	LMC	03F	8/11/2008	$13,440.00	$0.00	$948.00
34036	DEMOLITION OF DELAPIDATED PROPERTIES	2008	SBS	04	5/12/2009	$25,006.00	$0.00	$15,281.50
34062	DUNMORE HOUSING REHABILITATION PROGRAM	2008	LMH	14A	8/12/2008	$66,000.00	$0.00	$66,000.00
34286	ADMINISTRATION	2008		21A	9/29/2008	$25,000.00	$0.00	$20.00
34307	SINGLE FAMILY REHAB	2008	LMH	14A	8/10/2009	$83,216.00	$0.00	$44,562.03
34356	HAWLEY BOROUGH ST/RD	2008	LMA	03K	10/6/2008	$24,000.00	$0.00	$5,152.00
34367	Southern Cameron County Senior Center1	2010	LMC	03A	10/7/2008	$73,949.72	$0.00	$70,582.72
34612	ADMINISTRATION - SOMERSET COUNTY 08	2008		21A	10/28/2008	$53,203.00	$0.00	$203.00

At Risk Without Remediation Plan

Open activities without accomplishments* for more than 3 years:

IDIS Activity	Activity	Year	National Objective	Matrix Code	Fund Date	Funded Amount	Drawn Amount	% Drawn	Balance
31992	Listie Water System Improvements	2007	LMA	03J	9/19/2007	$149,224.00	121,800	81.62%	$27,424.00
32210	RECREATION	2007	LMA	03F	10/16/2007	$4,000.00	4,000	100.00%	$0.00
32277	SIDEWALK & CURB GRANT/LOAN PROGRAM	2007	LMA	03L	10/24/2007	$14,956.50	14,957	100.00%	$0.00
32707	HOUSING REHABILIATION	2007	LMH	14A	11/21/2007	$57,364.00	57,364	100.00%	$0.00
33203	FIRETRUCK LEASE PUBLIC FACILITY	2007	LMA	03O	11/12/2008	$228,100.95	228,101	100.00%	$0.00
34050	OLD FORGE SAMPSON STREET STORM SEWER	2008	LMA	03J	8/12/2008	$122,860.00	30,542	24.86%	$92,318.46
34062	DUNMORE HOUSING REHABILITATION PROGRAM	2008	LMH	14A	8/12/2008	$66,000.00	0	0.00%	$66,000.00
34262	STORM SEWER	2008	LMA	03I	9/23/2008	$23,287.87	23,288	100.00%	$0.00
34288	STREETS	2008	LMA	03K	1/22/2009	$46,275.00	38,627	83.47%	$7,647.58
34356	HAWLEY BOROUGH ST/RD	2008	LMA	03K	10/6/2008	$24,000.00	18,848	78.53%	$5,152.00
34431	ANNVILLE SIDEWALK REPLACEMENT	2008	LMA	03J	10/13/2008	$65,082.99	7,460	11.46%	$57,623.06

At Risk Without Remediation Plan

Open activities without accomplishments* and at least 80% drawn:

IDIS Activity	Activity	Year	National Objective	Matrix Code	Fund Date	Funded Amount	Drawn Amount	% Drawn	Balance
31990	REHABILITATION - CT-07	2007	LMH	14A	9/19/2007	$81,235.00	81,235	100.00%	$0.00
32210	RECREATION	2007	LMA	03F	10/16/2007	$4,000.00	4,000	100.00%	$0.00
32277	SIDEWALK & CURB GRANT/LOAN PROGRAM	2007	LMA	03L	10/24/2007	$14,956.50	14,957	100.00%	$0.00
32708	CLEARANCE AND DEMOLITION	2007	SBS	04	11/21/2007	$75,000.00	75,000	100.00%	$0.00
32709	STREET IMPROVMENTS	2007	LMA	03K	11/21/2007	$45,000.00	45,000	100.00%	$0.00
34262	STORM SEWER	2008	LMA	03I	9/23/2008	$23,287.87	23,288	100.00%	$0.00
34288	STREETS	2008	LMA	03K	1/22/2009	$46,275.00	38,627	83.47%	$7,647.58

At-Risk With an Approved Remediation Plan

This is a list of activities that have a Remediation Plan approved by the field office. These activities are organized by at-risk factor. The Expected Completion Date column refers to the date the grantee states that its remediation actions will be completed. This date will disappear when the grantee confirms in IDIS that it has successfully completed its remediation actions. This confirmation must be made on or before the Expected Completion Date. If a grantee does not confirm that those actions have been completed, IDIS will send an email asking the grantee to complete the activity or cancel the activity and reimburse all drawn funds.

U.S. Department of Housing and Urban Development
Office of Community Planning and Development
Integrated Disbursement and Information System
CDBG Activities At Risk Dashboard

COMMUNITY PLANNING DEVELOPMENT

Grantee: **PENNSYLVANIA**

At Risk With An Approved Remediation Plan

Open activities previously flagged without draws for more than 12 months:

IDIS Activity	Activity	Matrix Code	Fund Date	Remediation Submitted	Remediation Submitted by	Field Office Approved by	Field Office Approved On	Expected Completion Date	Actual Completion Date
35157	POOL STREET	03K	1/9/2009	11/2/2012	C04004	C04004	11/2/2012	11/3/2012	
35308	Public Facilities - Pumper Truck	03O	2/17/2009	11/7/2012	C04004	C04004	11/7/2012	11/8/2012	

At Risk With An Approved Remediation Plan

Open activities previously flagged without accomplishments* for more than 3 years:

IDIS Activity	Activity	Matrix Code	Fund Date	Remediation Submitted	Remediation Submitted by	Field Office Approved by	Field Office Approved On	Expected Completion Date	Actual Completion Date
32709	STREET IMPROVMENTS	03K	11/21/2007	11/2/2012	C04004	C04004	11/2/2012	11/3/2012	

At Risk With An Approved Remediation Plan

Open activities previously flagged without accomplishments* and at least 80% drawn:

IDIS Activity	Activity	Matrix Code	Fund Date	Remediation Submitted	Remediation Submitted by	Field Office Approved by	Field Office Approved On	Expected Completion Date	Actual Completion Date
41414	CDBG 2011 - Code Enforcement	15	4/20/2012	11/2/2012	C04004	C04004	11/2/2012	11/3/2012	

Pending At-Risk

These are the activities that will be added to the at-risk list within the next three months unless grantees are able to resolve the activities in the interim. This list is organized by at-risk factor. This list, also on the Review Activities screen for grantees, gives grantees and HUD field office staff a heads up on the number of activities that are in danger of being added to the at-risk list. Grantees

may want to deal with these activities now, so that they can avoid the extra work associated with at-risk activities.

Pending At Risk

Open activities without draws for more than 9 months:

IDIS Activity	Activity	Year	National Objective	Matrix Code	Fund Date	Funded Amount	Drawn Amount for last 9 mths	Balance
32210	RECREATION	2007	LMA	03F	10/16/2007	$4,000.00	$0.00	$0.00
32707	HOUSING REHABILIATION	2007	LMH	14A	11/21/2007	$57,364.00	$0.00	$0.00
32708	CLEARANCE AND DEMOLITION	2007	SBS	04	11/21/2007	$75,000.00	$0.00	$0.00
32711	FIRE STATION REHABILITATION	2008	LMA	03O	11/21/2007	$20,000.00	$0.00	$16,549.31
35287	SANITARY SEWER - MEYERSDALE	2008	LMA	03J	2/13/2009	$90,000.00	$2,000.00	$88,000.00
35288	HOUSING REHAB - CT	2007	LMH	14A	2/13/2009	$5,400.00	$3,000.00	$0.00
35307	CASCADE EQUIPMENT - FIRE DEPT.	2008	LMA	05	2/17/2009	$30,000.00	$0.00	$1,483.69
35659	HOUSING REHAB SIDEWALKS	2008	LMC	03L	8/27/2009	$20,000.00	$0.00	$19,750.00
35997	AFFORDABLE HOUSING SITES	2008	LMH	14G	7/17/2009	$28,852.00	$0.00	$1,247.76
36197	SMITHFIELD ADMINISTRATION	2008		21A	9/2/2009	$18,120.00	$0.00	$1,500.00
36228	ADMINISTRATION	2008		21A	9/3/2009	$45,401.00	$0.00	$1,649.00
36362	General Administration	2009		21A	10/9/2009	$12,000.00	$0.00	$6,572.30
36449	Volunteers in Medicine Operating Expenses	2009	LMC	05	10/23/2009	$42,828.00	$0.00	$0.00
36494	SEDA-COG Admin.	2009		21A	10/27/2009	$33,630.00	$0.00	$2,500.00
36501	SEDA-COG Admin	2009		21A	10/27/2009	$16,500.00	$0.00	$1,800.00
36502	Borough Admin	2009		21A	10/27/2009	$1,500.00	$0.00	$0.00

Additional Report Features

This report also displays the number of planning and administration activities that IDIS has automatically completed within the past month. This **auto-close** feature will only occur when grantees do not meet their deadline for submitting a Remediation Plan. Planning and administration activities are the only activities that the system will automatically complete.[2]

If the grantee needs to re-open the activity for some reason for a short period of time, the grantee may do so manually. However, any funds that were not drawn down for that activity will have been returned to the grantee's available to commit balance if grant funds were remaining. If the activity was funded with program income that was not completely drawn down, those funds would no longer be committed to that activity and would be available to commit on another activity.

Open Activities Auto-closed within the last month:

IDIS Activity	Activity	Year	National Objective	Matrix Code	Fund Date	Activity Closed Date	Activity Status
31988	SANITARY SEWER SYSTEM	2009	LMA	03J	9/19/2007	11/6/2012	Canceled
32909	Housing Rehab	2011	LMH	14A	12/13/2007	11/6/2012	Canceled
35484	WHARTON TWP STREETS	2008	LMA	03K	4/7/2009	11/7/2012	Canceled
42272	Dunmore St Improvements 2nd Ward Paving Project	2003	LMA	03K	8/2/2012	11/8/2012	Canceled

The report lists the number of activities flagged as **Cancel Pending**. These are the activities for which no action has been taken by grantees within the prescribed deadlines or those activities with Remediation Plans that have been disapproved. In these cases, IDIS will send an email asking the grantee to complete the activity or cancel the activity and reimburse all drawn funds.

[2] The only exception will be for 20A "State Planning" activities for State CDBG grantees, which require accomplishment data in IDIS, and therefore, cannot be automatically completed in the system.

Open Activities flagged as Cancel Pending:

IDIS Activity	Activity	National Objective	Matrix Code	Fund Date	Cancel Pending Flag
31990	REHABILITATION - CT-07	LMH	14A	9/19/2007	Cancel Pending
31992	Listie Water System Improvements	LMA	03J	9/19/2007	Cancel Pending
32707	HOUSING REHABILIATION	LMH	14A	11/21/2007	Cancel Pending
32711	FIRE STATION REHABILITATION	LMA	03O	11/21/2007	Cancel Pending
42270	JERMYN BORO STORM WATER IMP CHESTNUT/HUDSON STS.	LMA	03J	8/2/2012	Cancel Pending
42271	2003 CS-Public Comm Facilities-Parking Spaces	LMA	03	8/2/2012	Cancel Pending

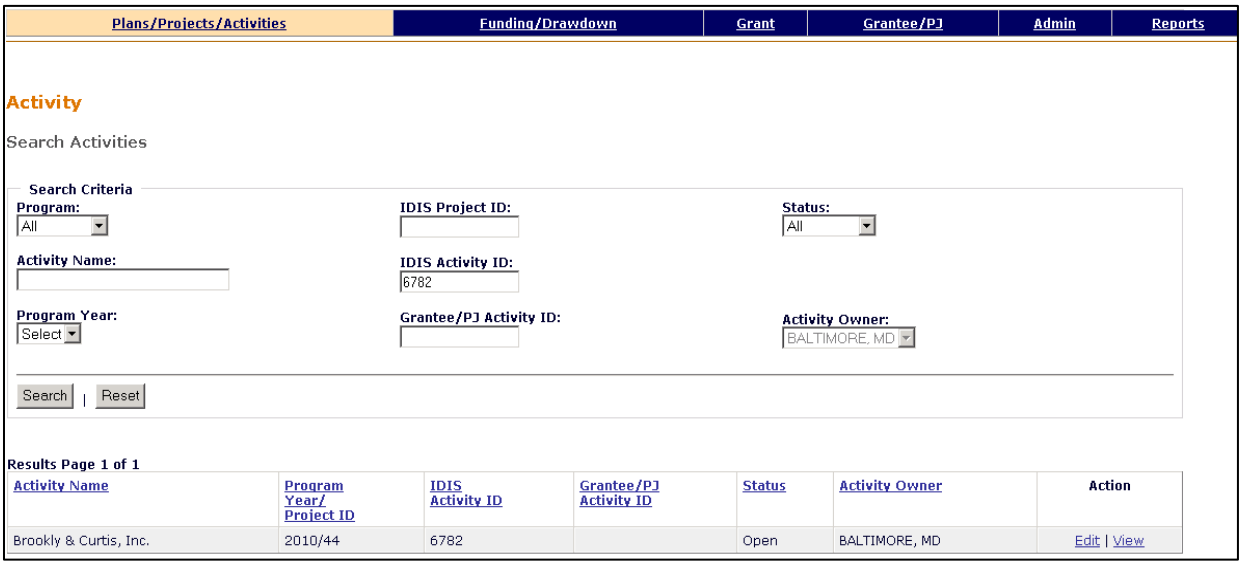
Requesting to Cancel an Activity with Draws

Grantees must now request approval from their HUD field office in order to cancel an activity for which funds have already been drawn down. The situations in which HUD may allow an activity to be cancelled with funds drawn against it are limited. All activities except planning and general administration are statutorily required to meet a national objective. If a grantee expended and drew down funds for an activity but the activity was not completed, it is unlikely that a grantee can demonstrate national objective compliance for the activity. Grantees are reminded that using CDBG funds for activity delivery costs for an activity makes that activity funded in part with CDBG funds, and thus subject to all CDBG requirements. If a grantee initiates an activity and then decides that it cannot or will not pursue the activity further, after initial activity delivery costs have been charged against the activity, it is unlikely that the grantee will be able to demonstrate national objective compliance for those activity delivery costs.

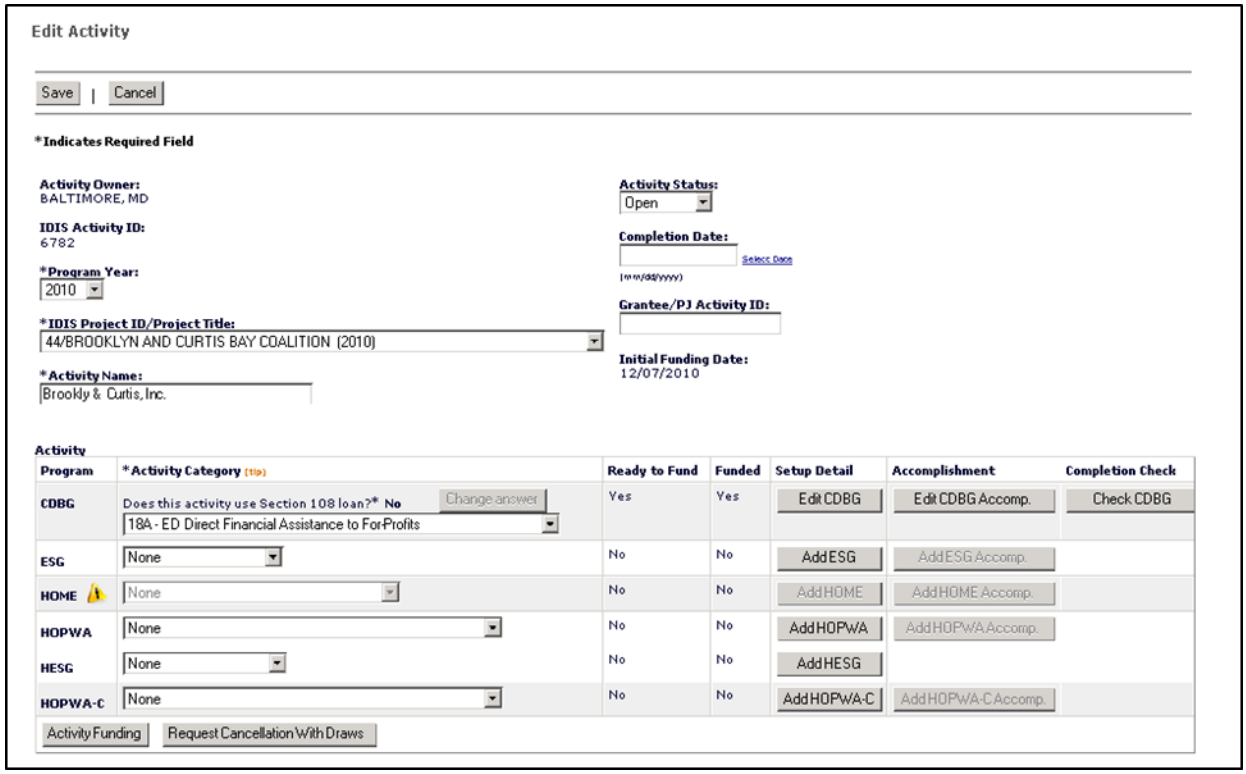
Grantees are advised to consult with their HUD field office before submitting a request to cancel an activity with draws. Field offices have been provided with guidance on resolving problems with never-completed activities and activities that have been discontinued after activity delivery costs were incurred.

To cancel an activity with draws, grantees must follow the following process.

1. Find the activity in the Plans/Activities/Projects section of IDIS by entering the Activity ID in the search box and clicking on the blue "Edit" link.



2. Click “Request to Cancel with Draws”



3. Enter $0 in the “returned amount” field and provide an explanation for why this activity can legitimately be cancelled with draws. If a national objective was not met, provide an explanation for why it was not met. If an activity was partially implemented and some portion met a national objective, the grantee may be able to undertake a partial return of funds drawn that did not achieve national objective compliance. The grantee may also reimburse all the drawn funds. *(If the funded amount exceeds the drawn amount, IDIS will prompt the grantee to reduce the funded amount to the amount drawn before requesting to cancel the activity with draws.)* Click “Save” to submit the justification to the local HUD field office for review.

Add CDBG Cancel With Draws Request

18A - ED Direct Financial Assistance to For-Profits

Save | Cancel

* Indicates Required Field

Grantee/PJ Activity ID:	**Activity Name:** Brookly & Curtis, Inc	**Program Year/Project ID:** 2010/44
IDIS Activity ID: 6782	**Activity Owner:** BALTIMORE, MD	**Project Title:** BROOKLYN AND CURTIS BAY COALITION

Current request status:	Pending
Current payment total:	$ 13,641.00
Current return total:	$ 0.00
Current drawn total:	$ 13,641.00
Return amount:*	- $
Grantee's explanation:*	

4. After the field office has approved the request to cancel the activity with draws, go back into the activity and change the activity status to "Cancelled".

5. When the field office disapproves a request to cancel an activity with draws, IDIS will send an email asking the grantee to complete the activity or cancel the activity and reimburse all drawn funds.

Justifications for Draws Revised from One Activity to Another

Grantees are now required to provide a justification on the Revised Voucher screen. In IDIS release 11.5, scheduled for March 2013, a report of these activities will be automatically generated and sent to field offices on a bi-weekly basis. Field Offices will review the justifications submitted by grantees for reasonableness by using this report. However, field offices do not approve or disapprove revised draws. If grantees do not submit a justification, they will be unable to revise the draw.

Revise Voucher Line Item

Save | Return to Maintain and Approve Voucher

Voucher Created For: BALTIMORE, MD	**IDIS Voucher # / Line Item #:** 5223719/2	**Grant #:** B-09-MC-24-0010	**Transaction Type:** Payment
Activity Owner: BALTIMORE, MD	**Created By:** B50399	**Approved By:** C01873	**Pay To:** BALTIMORE, MD
	Creation Date: 01/31/2011	**Approval Date:** 01/31/2011	

IDIS Information

IDIS Status:	Approved
Batch #:	456
Batch Date:	01/31/2011
LOCCS Control #:	900000000007679
LOCCS Status:	Completed

Voucher Update

Voucher Updated By:	LOCCS
Date Updated:	02/01/2011

LOCCS Confirmation Information

Confirm Batch #:	419
Confirm Batch Date:	02/01/2011
Confirmation Code:	Ok
Pay Method:	A
Payment Date:	02/01/2011
Schedule #:	LH8980
Reschedule:	N
Effective Date:	

Line Item

IDIS Actv ID	Activity Name	Program	Grant Year	Fund Type	Source Name	Source Type	Recipient Name	Prior Year	Drawdown Amount	Line Item Status	Submission Date
6855	HCD - Home Ownership Institute - Homeownership Assistance	CDBG	2009	EN	HUD	MC	BALTIMORE, MD	N	$25,385.72	Completed	01/31/2011

Revise Funds to Another Activity

IDIS Actv ID	Amount
	$

Required Justification*:

Guidance on Reasons for Delay and Remediation Plans

Grantees should provide as much detail as possible in their Reasons for Delay and Remediation Plans so that a field office has the information necessary to make the decision to approve or disapprove. Remediation Plans should, at a minimum, provide a timeline for drawing additional funds or reporting accomplishments, as applicable, and outline when the grantee expects to complete the activity. However, when such actions are not expected to occur within six months or additional actions will be undertaken to move the activity forward, grantees will also need to provide a detailed description of other efforts that will be implemented to resolve the delay in carrying out the activity.

General Considerations:

- Public services activities should almost always have draws and accomplishments within the first year or two
- Acquisition, economic development, and housing development activities that have specific plans, identified developers, and legally committed financing are more likely to be successful even though they will take longer to structure

- Solid agreements with subrecipients and for-profits are essential to ensure that CDBG funds are repaid even in unsuccessful ventures
- Accomplishments for public facilities activities cannot be reported until the public facility is completed. Because of this, these activities are the most likely to require remediation plans when there is actually no problem. For such activities, grantees should state that the activity is on schedule and should provide the estimated completion date.

The following sample justifications are examples of those that HUD would consider adequate and those that HUD would consider inadequate and would be disapproved by the local HUD field office. This list is for illustrative purposes only and should not be considered exhaustive.

Activities That Have Had No Draws for a Year:

Sample of Adequate Justifications:

Activity Description	Reason for Delay	Remediation Plan
Conversion of former high school into 58-unit affordable housing facility for seniors.	Part of the original funding for the project dried up and grantee has now secured new tax credit funding.	An application for Low-Income Housing Tax Credits was approved by the State Housing Finance Agency. Work on the project is expected to resume this month and be completed by June 2013. Grantee will send an update by January 2014 on the progress of this activity to the field office.
Improvements to neighborhood park	The grantee is waiting to make a final draw after paying final invoices to contractors, which have been delayed because of construction delays; construction completion was delayed 3 months due to unforeseen soils testing problems.	The activity has met a national objective and will be completed in IDIS as soon as the final draw is made. The remaining program funds of $ 25,468 will be reprogrammed by the City for other eligible CDBG activities by October 2013.

Sample of an Inadequate Justification:

Activity Description	Reason for Delay	Remediation Plan	What's Wrong?
Direct Homeownership Assistance	Grantee has not been able to award all of the funds to eligible buyers so there are still funds left to be drawn.	The activity will remain open as funds will be used to assist low/moderate income households with purchasing a home.	Does not present a timeline for making a draw or completing the activity.

Activities That Have Not Reported Accomplishments for Three Years:

Sample of Adequate Justifications:

Activity Description	Reasons for Delay	Remediation Plan
Construction of a new community center	The total timeline for the completion of the community center project is approximately 3.5 years. The construction was delayed due to unexpected environmental issues.	Construction has now started and will be completed by June 2013. Accomplishment data will be gathered and entered into the system by December 2013.
Loan to business for economic development	City is performing their due diligence on this issue, asking the business for a timeframe for creating jobs or repaying the loan, according to the terms of the agreement with the borrower. The owner is still having financial difficulties due to the recession.	If job creation will not occur by June 2014, the borrower will repay the loan in full, according to the terms of their agreement with the city.

Sample of an Inadequate Justification:

Activity Description	Reason for Delay	Remediation Plan	What's Wrong?
South Tuesday Property Acquisition	These parcels are part of a larger redevelopment area in the city that is still being planned.	The city is hopeful that redevelopment will begin late in 2013, and that we will be able to issue an RFP for development proposals for these parcels in early 2013. There are currently no contracts in place.	All CDBG activities must meet a national objective within a reasonable time frame. This remediation plan indicates that funding for redevelopment has not been secured and there is currently no estimate of when the CDBG-funded activity will meet a national objective. It is uncertain whether this project will proceed at all.

Activities that have 80 percent of their funded amount disbursed and no accomplishments reported

Sample of an Adequate Justification:

Activity Description	Reasons for Delay	Remediation Plan
Economic Development Activity: Assistance to Private Business (extension to facility & purchase of equipment)	Warehouse construction was delayed, which in turn delayed the purchase of the new equipment funded by CDBG.	The new warehouse building is on schedule to be completed by August 2013. Once completed and new equipment is installed, the business will begin the hiring process for newly created positions. The job reporting period will be ongoing through December 2013 with the activity to be completed in IDIS by January 2014.
48-56 Treelined Avenue	CDBG used for acquisition and HOME funds are being used for rehabilitation of these units. Rehabilitation almost completed. Properties have all been sold to eligible home owners	HOME-funded rehabilitation work will be completed in December 2012. The units have already been sold to income-eligible households, who will occupy the units by February 2013. Accomplishments will be reported in March 2013 and the activity will be completed at that time.

Sample of an Inadequate Justification:

Activity Description	Reason for Delay	Remediation Plan	What's Wrong?
Economic Development Activity: Assistance to Private Business (extension to facility & purchase of equipment)	Activity has not yet created any jobs.	Jobs will be reported in IDIS when the activity creates jobs.	There is no clear explanation about why the project is stalled and no timeline for getting the project back on track.

Activities that Grantees Request to Cancel After Funds Have Been Drawn

Sample of an acceptable justification:

Activity Description	Justification for Canceling with Draws
Economic Development Activity: Purchase of new equipment for tire manufacturer	Business went bankrupt prior to reporting employment. Grantee has taken all efforts provided under state law and the terms of the agreement to recover the CDBG investment in the project, but since CDBG was in second position to the private lender for the project, the grantee was unable to recover any funds.
Economic Development Loan to Pastry Shop, Loan Proceeds to be used for machinery and equipment	The business filed Chapter 7 Bankruptcy on June 23, 2013. They defaulted on the $40,000 loan. The State recovered $15,000 in collateral and refunded its revolving loan fund with this money. Prior to its closure the business it created 2 out of 4 new LMI FTE positions.

Sample of Inadequate Justifications:

Activity Description	Justification for Cancelling with Draws	What's Wrong?
Homebuyer counseling	Subrecipient lost records that show the information about beneficiaries necessary to demonstrate national objective compliance in IDIS. Activity must be cancelled with draws.	If the subrecipient cannot demonstrate that the activity met a national objective, the activity should be cancelled, but the CDBG investment should be reimbursed to the grantee's line of credit or local program account.