

# *Managing CDBG Subrecipients:*

*Managing an effective community  
development program*

Sponsored by



©2020 NCDA

1

---

# *Managing CDBG Subrecipients:*

*Managing an effective community development  
program*

## Session 5



©2020 NCDA

2

## QUESTIONS

---

### Leftover questions from Session 4?



©2020 NCDA

3

## Homework Assignment Four

---

1. You said we have to have a UEI number. Why?  
We're a nonprofit, not a commercial entity.
  - a) You have a point. Write us a letter and we'll issue a waiver.
  - b) It's okay to substitute your CCR number.
  - c) All non-federal entities – and you'll be one if you take our money – are required to have a UEI number. See §200.332(a)(ii).
  - d) I can't tell you why – It's a military secret – but you have to.



©2020 NCDA

4

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

2. You said we have to have a Procurement Policy. Why? If you decide to fund us, we don't plan to use your money for anything except paying staff salaries.
  - a) We'll give you a pass until you need to reallocate funds. We'll cross that bridge when we get there.
  - b) All non-federal entities – and you'll be one if you take our money – are required to have a Procurement Policy. See §200.318(a).
  - c) Not a problem. We know your board allows the executive director to make those decisions using her best judgement.
  - d) You have a point, Write us a letter and we'll issue a waiver.

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

3. Our proposed activity will provide adult day care for seniors with Alzheimer's or other forms of dementia. Will we need to collect income data on our clients?
- a) Yes, and their caregivers, too.
  - b) Yes, and their Social Security numbers, too.
  - c) Yes, unless they're on Medicare
  - d) No. Elderly is a Presumed Benefit category

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

4. When you talked about gathering income data, you used some terms – ACS and AMI, for example – that I’m not familiar with.
  - a) You’ll find both terms defined on the handout we’ve just given everyone.
  - b) Hmm... you might want to Google them and anything else you don’t understand.
  - c) Here’s a phone number. It’s long distance, but it will hook you up with HUD.
  - d) Wish I could help but I’ve forgotten what they mean.

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

5. We will be using some of our CDBG public service funds to purchase high-end computers and printers for an employment program. After the term of the contract, will we have to return the computers to the City?
- a) That depends. Check the Scope of Work section of your Subrecipient Agreement.
  - b) That depends. Check the Reversion of Assets section of your Subrecipient Agreement.
  - c) That depends. Check the Termination section of your Subrecipient Agreement.
  - d) You can't do that. You can't buy equipment with CDBG Public Service money.

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

6. We will be having a fundraiser during the term of the agreement. One of our program participants will be giving a testimonial at the dinner. Are the proceeds considered program income?

- a) Yes
- b) No
- c) Maybe
- d) Probably

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

7. Our staff work on multiple programs. Is it OK to just estimate their time on this CDBG-funded project for the time cards?

- a) Yes
- b) No
- c) Maybe
- d) Probably



## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

8. Our building is not handicapped accessible. Since its old, and we don't have funds to upgrade it, is that OK?
- a) Yes
  - b) No
  - c) Maybe
  - d) Probably

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

9. We expect to have some expenses related to our activity that would occur before the beginning of your program year. Can we be reimbursed for those?
- a) Yes
  - b) No
  - c) Maybe
  - d) Probably

## Homework Assignment Four

---

This page left blank intentionally.

## Homework Assignment Four

---

10. There sure are a lot of hoops to jump through. What happens if you fund us but we run into trouble meeting your expectations?
- Let us know whenever you need us to help. That's what technical assistance is all about.
  - Depends on what kind of trouble you're having. We might mutually decide it's best to terminate the Subrecipient Agreement.
  - Depending on how much trouble, we may send a grant manager to your office to conduct a formal monitoring.
  - Depending on what's going on with the subrecipient, any of the above might be the correct answer.

## Homework Assignment Four

---

This page left blank intentionally.

## Agenda – Session 5

---

- FFATA
- Setting up the Files
- Enter IDIS

## FFATA: Federal Funding Accountability and Transparency Act of 2006

---

## FFATA

---

- FFATA rules apply to all CDBG awards.
- FFATA reporting is mandatory for all CDBG awards.
- What has to be reported depends on the size of subawards.

## FFATA

---

### ➤ Important FFATA Definitions

- **Prime Awardee:** The entity receiving grant funding directly from a federal agency
- **Applicable Grant Programs:** CDBG
- **Subaward:** A legal instrument to provide support for the performance of the project/activity
- **First Tier Subaward:** Grant to an entity one level below prime awardee

## FFATA

---

How the definitions apply:

- **Prime Awardee** – the Grantee
- **Applicable Program** – CDBG
- **Subaward** – the grants made by the pass-through entity – in this case, the Grantee – to a subrecipient
- **First Tier Subaward** - a subaward made by a **grantee** as pass-through entity
  - A subaward made by a subrecipient acting as a pass-through entity is a second-tier subaward

## FFATA

---

- Subawards of \$25,000 or more must be reported to the Federal government
  - Use the FFATA Subaward Reporting System (FSRS).  
<https://www.fsrs.gov>
  - Reports must be submitted no later than the end of the month following the month in which the subaward is obligated.
  - Example: Funds are committed July 10 – grantee has until August 31 to file report

## FFATA

---

- Responsibility for filing subaward reports in FSRS rests with the Prime Awardee
  - This responsibility may not be delegated to subrecipients
  - Some data points may be pre-populated from HUD data or the Central Contractor Registration System (CCR)
    - Although CDBG subrecipients are not required to have CCR numbers, HUD strongly encourages participation on the part of subrecipients.

## FFATA

---

- At a minimum, prime awardees will enter the following subaward data into FSRS manually:
  - Subawardee name, address, and DUNS number
  - Amount of the subaward, obligation date, and subaward (grant) number.
  - Subawardee principal place of performance and project description

## FFATA

---

- If Prime or subawardee received in the previous fiscal year
  - 80% or more of total gross revenue in Federal grants, contracts, etc.,
  - AND
  - \$25 million or more in annual gross revenues from the same,
  - Then Executive Compensation Information on the five most highly compensated officials of the awardee organization must be posted
  - Exception: Reporting in FSRS not required if info is publicly available.



## FFATA

---

Subaward data entered in FRS is available to the public at the USAspending website.

[USAspending.gov](https://www.usaspending.gov)

## Setting Up The Files

---

## Setting Up The Files

---

If it's not documented, it didn't happen.

Follow the checklist then check the boxes.

## Setting Up The Files

---

Good documentation is about creating a paper trail.



Who said HUD could go paperless?

## Setting Up The Files

---

Two types of grantee file:

- The program file
- The activity file

## Setting Up The Files – The Program File

---

Document the national objective

Do you have a piece of paper?

## Setting Up The Files – The Program File

- Boilerplate language for certifying program meets a National Objective:

Public Service activities in [*this jurisdiction*] comply with the National Objective identified in 24 **CFR 570.208(a) Activities benefiting low- and moderate-income persons** meeting the criteria in paragraph (a)(1) *Area benefit activities*; (a)(2) *Limited clientele activities*; or (a)(3) *Housing activities*. The National Objective Codes for [*this jurisdiction's*] public service activities are LMA, LMC and LMH.



## Setting Up The Files – The Program File

The National Objective is now officially documented.

City of Happy Valley  
Community Development Department  
Public Service Grant Program

Subrecipient Primary Care & Hosp. Clinic      Activity Primary Care & Hosp. Clinic

This public service activity complies with the National Objective identified in 24 CFR 570.208(a) Activities benefiting low- and moderate-income persons meeting the criteria in paragraph (a)(2) Limited clientele activities. The National Objective Code for this public service activity is LMC.

*Happy Valentine*  
Happy Valentine, Community Development Director      Date: 7/1/14



## Setting Up The Files – The Program File

---

### ➤ What else:

- The NOFA
- Training Session Sign-In Sheets
- Print Out of Training Session Slide Show
- The Application Evaluation Tool
- Rejected Applications
- Letter to unsuccessful applicants
- General correspondence pertinent to the program

## Setting Up The Files – The Program File

---

### ➤ What else? Other possibilities:

- Grantees' program Policies and Procedures
- Monitoring Plan covering the program
- Monitoring Risk Assessment Tool
- Anything else that would help someone inspecting the file understand the goals of the program.

## Setting Up The Files – The Program File

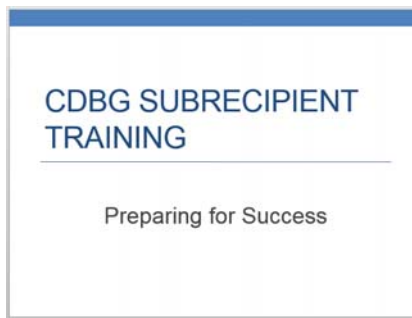
---

4.

a. Does the program participant provide technical assistance or training to subrecipients on an on-going and/or an as-needed basis?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Yes	No	N/A
<b>Describe Basis for Conclusion:</b>				
b. If the answer to "a" above is "yes," describe the technical assistance or training the program participant has provided during the most recently completed program year and complete the table below. (Attach training materials, brochures, attendance lists, etc., if appropriate.)				
Subrecipient Name	Number of Persons Trained	Topics	Training Date(s)	
<b>Describe Basis for Conclusion:</b>				

## Setting Up The Files – The Program File

---



Document -

When?

Who attended?

## Setting Up The Files – The Program File

---

### For Monitoring Covered by 2 CFR Part 200 Requirements.

c. Is there evidence that the program participant has provided appropriate resource materials to its subrecipients (e.g., governing regulations, 2 CFR Part 200, CPD Notices, the <i>CDBG Program Guide to National Objectives &amp; Eligible Activities for Entitlement Communities</i> , or corresponding websites) and keeps subrecipients abreast of program changes and new or revised requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<b>Describe Basis for Conclusion:</b>			

## Setting Up The Files – The Program File

---

### How do you document this?

- A letter to subrecipients listing the mentioned resources?
- Screen shots from your jurisdiction's web site showing links to "appropriate resource materials"?
- A page from your application that lists some of the available resources and where to find them?
- Other ideas?





## Setting Up The Files – The Activity File

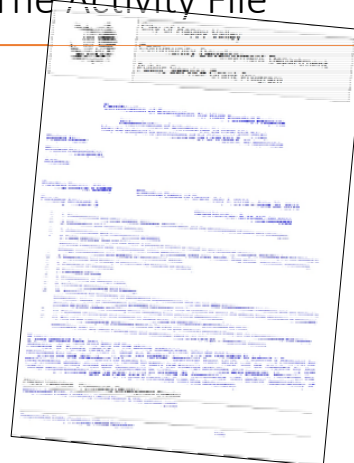
### 24 CFR 58.34 Exempt activities

(a)(4) Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;



## Setting Up The Files – The Activity File

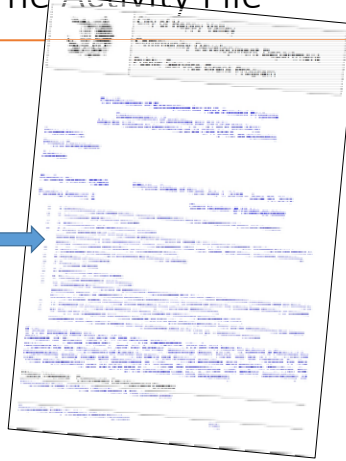
The ERR for most public service activities is going to be a one-page document.



## Setting Up The Files – The Activity File

---

The ERR should be easy – most public service activities are exempt.



## Setting Up The Files – The Activity File

---

The Environmental Review Record for non-public service activities will be more complex and time-consuming. Plan accordingly.

## Setting Up The Files – The Activity File

---

*Sine qua non*  
“Without which there is nothing...”

The Subrecipient Agreement

## Setting Up The Files – The Activity File

---

Document the national objective

Do you have a piece of paper?

## Setting Up The Files – The Activity File

---

### The Application –

If your application was submitted electronically, you will still want the signed hard-copy original of the subrecipient's certification that the information in the application is correct.



©2020 NCDA

55

## Setting Up The Files – The Activity File

---

- Application
  - Board of Directors Roster
  - Conflict of Interest Policy
  - Non-Discrimination Policy
  - Grievance/Termination Policy
  - Procurement Policy
  - Most recent Audit (if federal expenditures exceed \$750,000)



©2020 NCDA

56

## Setting Up The Files – The Activity File

---

### Pre-Award Assessment - §200.332(b)

- 1) The subrecipient's prior experience ...
- 2) The results of previous audits ...
- 3) Whether the subrecipient has new personnel or new...systems
- 4) The extent of Federal awarding agency monitoring [e.g. CoC awards]

Do you have a piece of paper?

## Setting Up The Files – The Activity File

---

The HUD monitor will ask how the grantee knows the subrecipient is in compliance with the following:

- Time distribution records
- Conflict of interest
- Procurement
- Record Retention
- Single audit – \$750,000 or more in federal money spent during program year

## Setting Up The Files – The Activity File

---

### ➤ The CDBG rule covers Conflict of interest in

#### **§570.611 Conflict of interest.**

(a) Applicability. (1) In the procurement of supplies, equipment, construction, and services by recipients and by subrecipients, the conflict of interest provisions in 2 CFR 200.317 and 200.318\* shall apply.

(2) In all cases not governed by 2 CFR 200.317 and 200.318, the provisions of this section shall apply.

\* §200.318 applies only to states.

## Setting Up The Files – The Activity File

---

### ➤ So does the Super Circular...

#### **§200.112 Conflict of interest.**

The Federal awarding agency must establish conflict of interest policies for Federal awards. The **non-Federal entity** must disclose in writing any potential conflict of interest to the Federal awarding agency or **pass-through entity** in accordance with applicable Federal awarding agency policy.

## Setting Up The Files – The Activity File

---

- Who is subject to the Conflict of Interest provisions of §570.611? Any person who is an:
    - Employee
    - Agent
    - Consultant
    - Officer
    - Elected Official
    - Appointed Official
      - of the recipient
      - of any designated public agency
      - of a subrecipient
- that receives CDBG funding.**



©2020 NCDA

61

## Setting Up The Files – The Activity File

---

- **Conflict of Interest**
  - Covers real and *apparent* conflicts of interest
    - Financial interest or benefit from CDBG Activity
    - Contractual interest in CDBG activity
  - Written Conflict Standards and Policies – Grantees and Subrecipients – including provisions for non-compliance
  - HUD can grant exception (§570.611(d)) given certain factors...



©2020 NCDA

62

---

### §200.318(c)(1) General Procurement Standards

The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.

---

### ➤ §200.303(a) Internal Controls

- An important internal control principle for subrecipients: A Code of Ethics for Board members



## Setting Up The Files

---

**A prospective subrecipient submits the following as its Conflict of Interest Policy:**

“Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest.

“The purpose of this guideline is to provide general direction so that employees can seek further clarification on issues related to the subject of standards of operation. Contact your supervisor for more information or questions about conflict of interest.”

## Setting Up The Files

---

### Polling Question 5-1

## Setting Up The Files

---

Polling Question 5-1 Answer  
This Page Left Blank Intentionally

## Setting Up The Files – The Activity File

---

➤ At a minimum, the Grantee should have the following from the subrecipient in its Activity File:

- Procurement Policy
- Conflict of Interest Policy
  - Board of Director Roster
- Most recent audit (if single audit required)
- Non-Discrimination Policy
- Grievance/Termination Policies
- Confidentiality Policy

## Setting Up The Files – The Activity File

---

Certifications of regulatory compliance

- It's not enough to know the subrecipient has the required policies and procedures.
  - The HUD monitor will want to know how you know those policies and procedures are being followed.

## Setting Up The Files – The Activity File

---

b. Does the program participant have a method to ensure that subrecipients' financial management systems are kept in accordance with 2 CFR 200.302(b)?	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<b>Describe Basis for Conclusion:</b> <div style="background-color: #cccccc; height: 20px; width: 100%;"></div>							

## Setting Up The Files – The Activity File

---

- To satisfy this requirement, the subrecipient should submit – at a minimum:
  1. Proof that it identifies and separates Federal awards in its accounting system;
  2. Accurate, current, and complete reporting of expenditures related to the subaward
  3. Records that identify the source and application of funds expended for the activity
  4. Proof that any assets acquired with subaward funds are adequately protected
  5. Comparison of subaward funds expended with the activity budget

## Setting Up The Files – The Activity File

---

<input type="checkbox"/> Payment Requests
<b>Reimbursement</b>
<input type="checkbox"/> Backup Documentation
<b>Advance</b>
<input type="checkbox"/> Documentation supporting compliance with §200.305(b)(1) & (b)(2)
<input type="checkbox"/> Program Income Tracking (if applicable)
<input type="checkbox"/> Payment Ledger
<input type="checkbox"/> Reports
<input type="checkbox"/> _____ <input type="checkbox"/> Semi-Annual <input type="checkbox"/> _____ <input type="checkbox"/> Year-End
<input type="checkbox"/> Technical Assistance Provided [§200.331(e)(1)]
<input type="checkbox"/> Letter to subrecipients detailing available resources
<input type="checkbox"/> Date, names, nature of training provided
<input type="checkbox"/> Monitoring Report(s)
<input type="checkbox"/> Internal Controls
<input type="checkbox"/> IDIS Reports
<input type="checkbox"/> PR03
<input type="checkbox"/> PR05

## Setting Up The Files – The Activity File

---

### Correspondence

#### What goes into the file?

- Letters
- E-mails
- Faxes
- Notes to the files
- Anything that will help that interested person understand what happened.

## Setting Up The Files – The Activity File

---

- What should not be in the activity file?
  - Personally identifiable information
  - Other sensitive information consistent with applicable Federal, state and local privacy and confidentiality laws
    - Examples:
      - Social Security numbers for subrecipient clients
      - HIPPA-protected information

## Training Objectives

---

➤ If your files follow these guidelines, this will be the result...

b. Describe the program participant's management system for the oversight of its subrecipients. (If the program participant has described its subrecipient management policies/processes/systems in writing, attach a copy, if practical.) [24 CFR 570.502; 2 CFR 200.228; 2 CFR 200.331]	<table border="1"> <tr> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<b>Describe Basis for Conclusion:</b>  							

## Setting Up The Files

---

### Polling Question 5-2

## Setting Up The Files

---

Polling Question 5-2 Answers

This Page Left Blank Intentionally



©2020 NCDA

77

## Setting Up The Files

---

Polling Question 5-2 Answers

This Page Left Blank Intentionally



©2020 NCDA

78

## Enter IDIS

---

## Enter IDIS

---

- Subrecipients expect to be paid ...
- Next step? Commit CDBG funds so that can happen.



Enter IDIS

➤ The Consolidated Plan – the strategy

➤ The Action Plan – the tactics



©2020 NCDA

Enter IDIS

➤ SP-45 Goals

**SP-45 Goals Summary - §1.215(a)(4)**

**Goals Summary Information**

SP-45 Goal #	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Total Outcomes Indicator
1	Affordable Housing	2015	2019	Affordable Housing	Citywide	Affordable Housing	COBG: \$808,076	Unmet financial assistance for Homelessness: 02 Unemployed Assisted
2	Housing Rehabilitation	2015	2019	Affordable Housing	Citywide	Affordable Housing	COBG: \$1,043,750	Homeowner Housing Rehabilitation: 30 Household Housing Unit
3	Acquisition	2015	2019	Affordable Housing	Citywide	Affordable Housing	COBG: Other: \$1,150,000	Public Facility on Acquisition other than Low/Moderate Income Housing Units: 0 Priority Assisted
4	Public Facilities	2015	2019	Non-Housing Community Development	Citywide	Public Facilities Homelessness	COBG: \$0	Public Facility on Acquisition other than Low/Moderate Income Housing Units: 0 Priority Assisted
5	Fair Housing	2015	2019	Fair Housing	Citywide	Fair Housing	COBG: \$5,000	Fair Housing
6	Microenterprise	2017	2019	Economic Development	Citywide	Economic Development	COBG: \$0	Jobs created/retained: 0 Jobs
7	Public Service Grants	2016	2019	Non-Housing Community Development	Citywide	Public Services Homelessness	COBG: \$200,000	Public Service activities other than Homelessness: 25000 Persons Assisted
8	Emergency Shelter and Street Outreach	2016	2019	Homeless	Citywide	Homelessness	Emergency Solutions Grant: \$200,000	Homeless Person Overnight Shelter: 000 Persons Assisted
9	Rapid Re-Housing	2016	2019	Homeless	Citywide	Homelessness	Emergency Solutions Grant: \$300,139	Tenant-Based Rental Assistance / Rapid Rehousing: 100 Households Assisted
10	Homelessness Prevention	2016	2019	Homeless	Citywide	Homelessness	Emergency Solutions Grant: \$210,119	Homelessness Prevention: 500 Persons Assisted



©2020 NCDA

Enter IDIS

**Annual Goals and Objectives**

**AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2015	2019	Affordable Housing	Citywide	Affordable Housing	CDBG: \$110,000	Direct Financial Assistance to Homebuyers: 10 Households Assisted
2	Housing Rehabilitation	2015	2019	Affordable Housing	Citywide	Affordable Housing	CDBG: \$299,992	Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	Acquisition	2015	2019	Affordable Housing	Citywide	Affordable Housing	CDBG: \$235,000	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit
4	Fair Housing	2015	2019	Fair Housing	Citywide	Fair Housing	CDBG: \$1,000	Other: 0 Other
5	Public Facilities	2015	2019	Non-Housing Community Development	Citywide	Public Facilities	CDBG: \$89,529	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
6	Public Service Grants	2016	2019	Non-Housing Community Development	Citywide	Public Services	CDBG: \$113,308	Public service activities other than Low/Moderate Income Housing Benefit: 4000 Persons Assisted
7	Administration	2015	2019	Administration	Citywide	Administration	CDBG: \$145,572	Other: 0 Other

Table 5 - Goals Summary

Enter IDIS

Project



Activity

Use projects to group similar activities

## Enter IDIS

---

Provide enough detail that HUD and the public can determine what the project is about and if it is eligible.

#	Project Name
1	Administration/General Community Development
2	Housing - Homeowner Housing Rehab
3	Housing - Homeownership Assistance Direct
4	Housing - Acquisition of Real Property
5	Public Services - Healthcare
6	Public Services - Employment Training
7	Public Services - Abused and Neglected Children
8	Public Services - Elderly
9	Public Services - Youth Services
10	Public Services - Childcare Services
11	Public Services - Homeless Prevention
12	Public Services - Battered and Abused Spouses
13	Public Facilities
14	Administration/Fair Housing Activities

Table 7 – Project Information



## Enter IDIS

---

### AP-38 Project Summary

7	<b>Project Name</b>	<b>CDBG: Public Services - Abused and Neglected Children</b>
	Target Area	Citywide
	Description	Public service activities
	Estimated Amount	CDBG: \$11,000
	Expected Resources	CDBG: \$11,000
	Annual Goals Supported	Public services
	Target Area	Citywide
	Priority Needs Addressed	Public services
	Planned Activities	Kymari House - \$11,000
	Goal Outcome Indicator	Public service activities other than low/moderate-income housing benefit: 150 Persons Assisted



## Enter IDIS

---

Setting up activities in IDIS can be a frustrating process.

Using the IDIS Activity Worksheet in your download packet in conjunction with HUD's pdf of the various IDIS Activity screens can make the process more manageable.



©2020 NCDA

87

## Enter IDIS

---

- Every activity must:
  - 1) Meet a National Objective
  - 2) Be eligible as covered in §570

HUD provides a shorthand for establishing activity eligibility:

Matrix Codes



©2020 NCDA

88

## Enter IDIS

---

### Public Service Matrix Codes

- 03T Operating Costs of Homeless/AIDS Patients Programs
- 05A Senior Services
- 05B Handicapped Services
- 05C Legal Services
- 05D Youth Services
- 05E Transportation Services
- 05F Substance Abuse Services
- 05G Services for Battered and Abused Spouses
- 05H Employment Training
- 05I Crime Awareness/Prevention
- 05J Fair Housing Activities (subject to Public Services cap)
- 05K Tenant/Landlord Counseling
- 05L Child Care Services



©2020 NCDA

89

## Enter IDIS

---

### Public Service Matrix Codes

- 05M Health Services
- 05N Services for Abused and Neglected Children
- 05O Mental Health Services
- 05P Screening for Lead Poisoning
- 05Q Subsistence Payments
- 05R Homeownership Assistance (no housing counseling)
- 05S Rental Housing Subsidies
- 05T Security Deposits
- 05U Housing Counseling Only
- 05V Neighborhood Cleanups
- 05W Food Banks
- 05X Housing information and referral services
- 05Y Housing Counseling supporting downpayment assistance
- 05Z Other Public Services



©2020 NCDA

90

## Enter IDIS

---

- Designate a target area? In the Consolidated Plan, the rationale for selecting an area or areas and how the money was divided had to be narrated.
- If the rationale has changed, narrate the rationale in AP-50.

## Enter IDIS

---

- National Objective Codes (NOCs)
  - 15 national objective codes (NOCs) to describe activities
  - No code for admin and planning activities subject to the 20% Admin cap

Enter IDIS

---

### **Public Service Activities**

- ✓ LMC – Low/mod limited clientele benefit
- ✓ LMA – Low/mod area benefit
- ✓ LMH – Low/mod housing benefit



©2020 NCDA

93

Enter IDIS

---

- LMCSV – Low/mod limited clientele, job service benefits
- LMHSP – Low/mod housing benefit carried out by a CDFI or linked to an NRSA
- SBA – Slum/blight area benefit
- URG – Urgent need activity



©2020 NCDA

94

Enter IDIS

---

### **Performance Objective**

- Creating a suitable living environment
- Providing decent housing
- Creating economic opportunities



©2020 NCDA

95

Enter IDIS

---

### **Performance Outcome**

- Improving availability or accessibility of units or services
- Improving affordability of housing or services
- Improving sustainability by promoting viable communities



©2020 NCDA

96



## Enter IDIS



Not required ... but lots of good information that might not otherwise show up in your file (e.g. Accomplishment Type, Performance Objectives, and Performance Outcomes).

**CDBG IDIS ACTIVITY SETUP INFORMATION  
PUBLIC SERVICE SUBRECIPIENTS**

Subrecipient \_\_\_\_\_ Activity \_\_\_\_\_  
Amount to be Funded \$ \_\_\_\_\_

**Add Activity**  
Select Project (Other project name) \_\_\_\_\_  
Activity Name \_\_\_\_\_  
CDBG Activity Category (Refer to Main Code sheet) \_\_\_\_\_  
Environmental Review: HEROIS  (Optional)  Complete  Exempt  Underway  
Comment on ERH (Optional) \_\_\_\_\_  
Activity Description \_\_\_\_\_  
Click Add CDBG

**Add CDBG Setup Detail (Page 1)**

National Objective:  LMC  LMA  LMI  Other (MC) \_\_\_\_\_  
Accomplishment Type:  01 - People  02 - Housing  
Program Year: \_\_\_\_\_  
Program Count: \_\_\_\_\_  
Performance Objectives:  Creating a suitable living environment  
 Providing decent housing  
 Creating economic opportunities  
Performance Outcomes:  Improving availability or accessibility of utility or services  
 Improving affordability of housing or services  
 Improving resiliency for promoting viable communities  
Confidential?  Yes  No  
Address - Line 1: \_\_\_\_\_  
Address - Line 2: \_\_\_\_\_  
Address - Line 3: \_\_\_\_\_  
City: \_\_\_\_\_  
State: \_\_\_\_\_  
Zip (or ZIP+4 office) (Include Address to provide Zip build) \_\_\_\_\_ No DDE Correct?  Yes  No  
Activity Purpose:  Help Prevent Homelessness?  Yes  No  
 Help those with HOMESET?  Yes  No  
 Help those with INFURGESET?  Yes  No  
 Help Families with Disabilities?  Yes  No  
Associate with another Activity?  Yes  No  
If Yes, CDBG Activity #: \_\_\_\_\_  
Activity carried out by grantee?  Yes  No  
If No, Name of Organization: \_\_\_\_\_  
Organization Type:  Another Unit of Local Government  
 Addressed to Activity: \_\_\_\_\_  
 CDBG designated as a subrecipient  
Target Area?  Subrecipient Line: \_\_\_\_\_  
 Yes  No  
If Yes, Type and Area Name: \_\_\_\_\_  
Special Characteristics:  Federally Declared Major Disaster Area  Yes  No  
 Hazard Prone Area  Yes  No  
 Brownfield Redevelopment Area  Yes  No  
 Conversion from Non-competitive to Residential  Yes  No  
Approved Address:  Not for Public Service Activities  Yes  No  
Activity Information:  Not for Public Service Activities  Yes  No  
Click Save and Continue to Add CDBG Setup Detail (Page 2) - LMC, LMA or LMI

1



## Enter IDIS

What next?  
“Rinse and repeat” by clicking Return to Add-Edit Funding  
or  
Log out  
Take a well-deserved break.



## QUESTIONS

---

Any questions?

## HOMEWORK

---



Find Exercise 5 in your download package.

There are 10 questions based on our discussion of Setting Up Files and IDIS.

Four choices for each question; pick the response that best answers the question.

Use any of the resource materials provided in your download package... including the list of links.

At the beginning of the next session we will discuss.

## Session 6

---

For Session 6, you will need to download or have available:

- Slides
- Polling Questions for Session 6
- Homework – Exercise 6
- Internal Controls Checklist



©2020 NCDA

101

## MORE QUESTIONS?

---

If you have any questions between the end of today's session and our next session, send me an email:

[johnncallow@bellsouth.net](mailto:johnncallow@bellsouth.net)



©2020 NCDA

102