



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-7000

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

October 30, 2002

MEMORANDUM FOR: All CPD Field Office Directors

FROM: Nelson R. Bregón, Deputy Assistant Secretary for Grant Programs, DG

SUBJECT: Section 108 Loan Guarantee Program
Reporting of Actual Accomplishments

The Office of Management and Budget (OMB), in performing its role with regard to the Government Performance Review Act (GPRA) and the Annual Performance Plan (APP), has expressed an immediate interest in actual performance data regarding the Section 108 loan guarantee program (Section 108) and corresponding Economic Development Initiative and Brownfields Economic Development Initiative (EDI/ BEDI) competitive grant programs. The purpose of this memorandum is to establish procedures for CPD Field Offices to collect and report to Headquarters *actual accomplishments* for activities assisted with Section 108 and EDI/ BEDI financing. Currently, such procedures do not exist.

Background.

The requirements for reporting annual performance are implemented in the CDBG regulations at 24 CFR 570.507 – *Reports* (for metropolitan city and urban county grantees) and 24 CFR 570.491 – *Performance and Evaluation Report* (for state grantees). These requirements are further defined in the Consolidated Plan regulations at 24 CFR 91.520 – *Performance Reports*. The annual performance report must be submitted to the appropriate CPD Field Office within 90 days after the close of the grantee’s program year.

CDBG grantees currently submit a Consolidated Annual Performance and Evaluation Report (CAPER) to report actual CDBG accomplishments. With regard to states, the CAPER is further accompanied by the submission of the Performance Evaluation Review (PER), as appropriate. As provided at 24 CFR 91.520(c), “For CDBG recipients, the report shall include a description of the use of CDBG funds during the program year ...” (emphasis added). The term “CDBG funds” is defined at

24 CFR 570.3 and 570.481 to include loans guaranteed under subpart M of the CDBG regulations (24 CFR 570.700, the Section 108 loan guarantee regulations) and funds awarded under Economic Development Grants, section 108(q) of the Housing and Community Development Act of 1974, as amended (i.e., EDI/ BEDI grants).

Presently, CPD Field Offices have two principal means for gathering data and evaluating a grantee's performance: the CAPER and the Integrated Disbursement and Information System (IDIS). Headquarters does not receive CAPER copies and, therefore, must rely on performance data obtained from IDIS. However, IDIS does not provide grantees an opportunity to report on Section 108-assisted activities, effectively precluding Headquarters from assessing Section 108 and EDI/ BEDI program performance.

Section 108 Accomplishments Reporting Initiative.

For grantees located within its jurisdiction, each Field Office is requested to review the most recent CAPER and report actual accomplishments for Section 108 and EDI/ BEDI programs to Headquarters within 90 days from the date of this memo. Thereafter, and on an ongoing basis, the information should be reported to Headquarters within 90 days after the receipt of each grantee's CAPER. Where accomplishment data is not available from the CAPER, the Field Office will need to contact the grantee and require the information be submitted without delay, as well as advise them that such activities must be included in all future CAPERs until IDIS is updated accordingly.

Once accomplishments data has been gathered, the Field Office is requested to enter it into the attached Excel worksheet, titled the Section 108 Accomplishments Report. The report is based on current IDIS screens and is designed to aid in the uniform collection and reporting of accomplishment data for Section 108 and EDI/ BEDI activities. Moreover, it is intended that this procedure will avoid the grantee having to report in a different format. Once completed, the report should be returned by e-mail to Jacquita B. Black, Financial Management Analyst. (A blank copy of the worksheet will be e-mailed to each Field Office for their use.)

Each month, the Financial Management Division distributes an e-mail copy of the Loan Application Management System (LAMS) report to Field Office Directors for the purpose of assisting them in managing their Section 108 portfolios. The LAMS report lists active Section 108 projects located within each Field Office's jurisdiction and will be helpful in identifying projects that are to be reported in the CAPER.

Headquarters is well aware of the additional workload this assignment may generate and would not make this request if it were not critical to the management of the Section 108 and EDI/ BEDI programs. However, the Field can be assured that this reporting initiative will be terminated once Headquarters updates the IDIS to include reporting requirements for Section 108-assisted activities.

Questions regarding the contents of this memorandum should be addressed to Paul Webster, Director, Financial Management Division, at 202-708-1871.

Attachment: Excel worksheet, "Section 108 Accomplishments Report".