



May 31, 2022

Mr. Kevin Bush
Deputy Assistant Secretary for Grant Programs
Office of Community Planning and Development
United States Department of Housing and Urban Development
451 7th Street, Southwest
Washington, District of Columbia 20410

Dear Deputy Assistant Secretary Bush:

The Council of State Community Development Agencies (COSCDA) extends our gratitude for your leadership and responsiveness to state housing and community development programs. As administrators of U.S. Housing and Urban Development – Community Planning and Development (HUD-CPD) programs, COSCDA members direct these resources to meaningful investments promoting housing opportunities, infrastructure development, and related local-led initiatives. Technology plays a significant and necessary role in this process. As you are well-aware, project data is maintained using HUD-operated systems, Integrated Disbursement and Information System (IDIS) and Disaster Recovery Grant Reporting System (DRGR). COSCDA recognizes the importance of tracking project information and maintaining records consistent with determining how federal dollars are applied for intended outcomes. However, ongoing challenges exist which limit efficient use of both systems. The issues result in added time and administrative costs to state programs.

State CPD program administrators report many instances of complications with IDIS. These include unnecessary and duplicative reporting fields which are required in IDIS to submit project information. Additionally, the system is not intuitive with menu options out of sync and not properly adjusted for user access. Project labeling is also insufficient with only project address and IDIS activity number available in searching for individual projects in the system. Regarding consolidated plans, as various staff across CPD programs access and contribute to IDIS, adding information to the system proves cumbersome; for instance, entering text is challenging with character restrictions in place on a number of fields. Information submitted between different programs is also not consistent or compatible as separate processes exist for recording beneficiary data for HOME and CDBG. On HOME projects as well multiple addresses are required in IDIS which isn't responsive to project developments and how information is maintained from the developer end. Lastly, and perhaps most challenging, IDIS continues to be mismatched with grantee software resulting in inefficiencies and duplications for reporting activities through both systems.

For DRGR, we likewise encourage several changes to advance system access and use. DRGR is critical for grantees with both action plan development and assessing unmet needs. As such, access should be provided immediately following disasters and ahead of funding allocation. Currently, both activities are conducted by jurisdictions outside of DRGR until HUD grants access to the system. By allowing access earlier, duplication is avoided in completing these tasks and risk of errors is minimized in communicating the information. HUD

would also benefit by allowing grantees to be a part of their software development with HUD vendors. Additionally, HUD is encouraged to adopt the User Acceptance Training (UAT) as a best practice activity in concert with the action plan process.

We strongly urge HUD to direct existing agency resources and personnel to ensure improvements to IDIS and DRGR can be accommodated. One critical step in this process involves HUD interacting with state and local program administrators on system needs and proposed solutions. In turn, grantees are available to test new software or IT products to inform any widespread system updates. COSCDA offers to assist in this engagement and coordinate with HUD on both of these activities.

We appreciate your consideration of this key part of HUD program implementation, and look forward to working together to improve IDIS and DRGR.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianne E. Taylor". The signature is fluid and cursive, with a large initial "D" and "T".

Dianne E. Taylor
Executive Director