

November 3, 2025

Regulations Division, Office of General Counsel
Department of Housing and Urban Development
451 7th Street SW, Room 10284
Washington, DC 20410-0500

RE: Docket No. FR-6565-N-01, Notice of Recipient Financial Reporting Demonstration

The Council of State Community Development Agencies (COSCD A) appreciates the opportunity to comment on the Department of Housing and Urban Development's (HUD) demonstration of a new reporting portal. COSCD A represents state agencies that administer HUD grants in four key program areas: community development, housing, homelessness, and disaster recovery. We represent grant recipients from two of the HUD programs identified for this demonstration—Community Development Block Grant-Disaster Recovery (CDBG-DR) and Continuum of Care (CoC) programs.

COSCD A members are committed to responsible program administration and understand the need for thorough reporting. Waste, fraud, and abuse of federal funds should have no place within HUD programs. COSCD A is a national association that can offer high-level comments to support the success of this demonstration.

What are ways HUD can alleviate administrative burden as we transition funding recipients to new grants management and reporting systems?

CDBG-DR recipients primarily use HUD's Disaster Recovery Grant Reporting System (DRGR) for grant management and reporting. CoC recipients use the *e-snaps* system, supported by the Office of Special Needs Assistance Programs (SNAPS). Both systems have been in use for multiple grant cycles. Program managers have spent time and money training staff to use DRGR and *e-snaps*. If HUD moves forward with a new financial reporting portal, COSCD A recommends the following:

- **Do not require grant recipients to use *both* the new portal and existing grant management systems (DRGR, *e-snaps*, etc.).** Managing one reporting system is enough of an administrative burden. If HUD required grant recipients to use an existing system *plus* the new system, more time and funding would be consumed by the need to train staff on multiple systems.
- **Provide robust guidance and technical assistance during the transition.** Before requiring recipients to transition to a new system, HUD should publish clear guidance and identify avenues for technical assistance to support grant managers. Implementation of any new system will be delayed if recipients are unsure how and when to use it.

- **For CDBG-DR specifically, HUD should allow for flexibility and anomalies when tracking these complicated, years-long grants.** When commenting on current DRGR grantee projection reporting requirements, one COSCDA member explained, “No amount of financial modeling can account for the uncertainties inherent in environmental reviews, procurement delays, local match issues, employee sick days, new storms, etc.”
- **As HUD pilots a new grant reporting portal, we recommend balancing the need for detailed reporting with the need for streamlined program administration.** CDBG-DR and CoC programs serve some of the nation’s most vulnerable populations, including disaster survivors and homeless individuals and families. Burdensome reporting requirements often slow down the administration of these programs and thus delay the speed with which funding reaches Americans who need it the most.
- **To the extent possible with current technology, HUD should design the new reporting system to allow for easy documentation uploads, to remove any duplicative requirements, and to allow for quick review.** If financial controls are in place and grant funds are approved, the system should be immediately responsive to payment requests—for instance—rather than delaying projects by forcing every transaction through another review process.
- **Rather than adding to grantees’ administrative burden, HUD should use existing planning and reporting documentation to better protect against waste, fraud, and abuse.** COSCDA reminds HUD that CDBG-DR and CoC grant recipients already manage several time-sensitive planning and reporting obligations. CDBG-DR recipients, for example, must draft and submit extensive action plans outlining how funds will be used to help their communities recover from disasters. CoC recipients apply for funding through annual (or bi-annual) NOFOs that require significant amounts of data and staff time to complete. State agencies also undergo financial auditing to which HUD could obtain access.

Thank you for considering our comments. Please reach out to Jenna Hampton (jhampton@coscda.org), Director of Advocacy and Federal Programs, for further communication. We welcome the opportunity to partner with HUD on the implementation of this demonstration moving forward.

Sincerely,



Tess Hembree
Executive Director, COSCDA