

Chapter 15

AT-RISK ACTIVITIES

A State CDBG activity is flagged as at risk if it meets one or more of the following conditions:

1. For a planning/admin activity (excluding 20A), no draws have been made for three years.
2. For a non-planning/admin activity, no draws have been made for two years from the initial funding date. Subsequent to the first draw for an activity, it will be flagged if no draws are made for one year.
3. The activity has been open for three years and no accomplishments have been reported.
4. 80% of the funded amount for the activity has been drawn down, but no accomplishments have been reported.

Note: Public facilities and economic development activities (except 18B) are exempt from the 80% drawn flag. The exempt matrix codes are 03* except for 03T, 14E, 17*, 18A, and 18C.

If any CDBG activities have been flagged, an orange banner alerting you to the number of flagged activities is displayed at the top of every screen:

The screenshot shows a web application interface. At the top, there is a navigation bar with tabs: Plans/Projects/Activities, Funding/Drawdown, Grant, Grantee/PJ, Admin, and Reports. Below the navigation bar, there is a user profile sidebar on the left with the following information: User: C00063, Role: Grantee, Organization: OKLAHOMA, and links for Switch Profile and Logout. The main content area features an orange banner at the top with the text: "You have 21 CDBG and 4 HOME activities that have been flagged. Click on the number to go to the review page." A blue arrow points to the "21 CDBG" text. Below the banner, there is a section titled "Activity" with a "Search Activities" form. The search form includes the following fields: Program (dropdown menu with "All" selected), IDIS Project ID (text input), Status (dropdown menu with "All" selected), Activity Name (text input), IDIS Activity ID (text input), Program Year (dropdown menu with "Select" selected), Grantee/PJ Activity ID (text input), and Activity Owner (dropdown menu with "OKLAHOMA" selected). At the bottom of the search form, there are "Search" and "Reset" buttons.

Click on the CDBG link in the banner (or on the Activity [Review](#) link on the navigation bar) to display the CDBG Review Activities screen.

CDBG REVIEW ACTIVITIES SCREEN

This screen lists all CDBG activities that have been flagged and those for which flags are pending:

Review Activities

CDBG [HOME](#)

Grantee's Remediation Plan was Rejected by the Field Office: **1**
 Awaiting Grantee's Required Explanation and Remediation Plan: **3** (1 is overdue)
 Awaiting Field Office Review: **1**
 Remediation Completed by Grantee but Plan is Still Awaiting Field Office Review: **1** (1 is overdue)
 Awaiting Grantee's Completion of Remediation Actions: **2** (1 us overdue)
 Pending at Risk: **13**

Click on the count above to jump directly to the corresponding section

- ✘ The activity is currently flagged as At-Risk for the condition specified on the column heading
- No action required but this activity may soon be flagged as At-Risk for the condition specified on the column heading
- ^ This appears next to the due date if the activity review is overdue

Grantee's Remediation Plan was Rejected by the Field Office (1 Activity)

Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Review Date	Action
1 Eldorado 15412 CD	13523	2012/122	✘			6/20/15	View

Awaiting Grantee's Required Explanation and Remediation Plan (3 Activities)

Overdue: 1

Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Carmen 15167 CD	13377	2012/49	✘			12/18/15 ^	Explain
2 Paoli 14460 cd	12586	2010/209	✘			6/24/15	Explain
3 Klowa 15574cd	13659	2013/35	✘			7/5/15	Explain

Awaiting Field Office Review (1 Activity)

Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Canadian 15425 CD	13542	2012/138	✘			7/16/15	Edit Remediate

Remediation Completed by Grantee but Plan is Still Awaiting Field Office Review (1 Activity)

Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Canute 14732 CD	12916	2011/55	✘	✘		6/16/14 ^	View

Awaiting Grantee's Completion of Remediation Actions (2 Activities)

Overdue: 1

Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Wewoka 14802 cd	12954	2011/74	✘	✘		3/31/15 ^	Remediate
2 Oaks 15062cd	13265	2011/162	✘	○		8/8/15	Remediate

Pending at Risk (13 Activities)

Activity Name	IDIS Activity ID	Project	270 Days No Draw	2 yr 9 Mos No Acc	66% Drawn No Acc
1 Elmore City 15076 CD	13285	2011/166	○	○	
2 Cherokee County 15095 CD	13303	2011/172		○	
3 Manitou 15090cd	13312	2011/182	○	○	

The summary at the top of the page shows the number of at risk activities at each stage in the review and resolution process and the number of pending at risk activities. Clicking on an activity count will display the list of activities in that stage.

This chapter explains the actions you need to take for flagged activities at each stage of the review and resolution process. For additional information and guidance, see [FAQs CDBG IDIS 11.4 System Changes](#) and [CDBG Changes in IDIS Instructions for Grantees IDIS Release 11.4](#).

AWAITING GRANTEE’S REQUIRED EXPLANATION AND REMEDIATION PLAN

For each at risk activity listed under “Awaiting Grantee’s Required Explanation and Remediation Plan,” you must explain why the activity has been delayed and the actions you plan to take to resolve the delay*.

Awaiting Grantee's Required Explanation and Remediation Plan (3 Activities)								
Overdue: 1								
	Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1	Carmen 15167 CD	13377	2012/49	✘			12/18/14	Explain
2	Paoli 14460 cd	12586	2010/209	✘			6/24/15	Explain
3	Kiowa 15574cd	13659	2013/35	✘			7/5/15	Explain

The DUE DATE for submitting the remediation plan to your Field Office is shown in the next-to-last column. If a plan is not submitted by the DUE DATE, it is marked as “Overdue.”

Before inputting a plan into the system, you may want to consult with your Field Office about the actions you intend to take and the timeline for completing them. Also be aware that once approved or rejected by the Field Office, a plan cannot be changed.

*If you complete or cancel the activity by the DUE DATE, a remediation plan is not needed.

To enter a plan, click on the [Explain](#) link in the last column to display this screen:

Review Activities (2 of 3)

CDBG

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Activity Name	IDIS Activity ID	Grantee Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc
Paoli 14460 cd	12586		2010/209	✘		

The grantee must provide Reasons for Delay and a Remediation Plan no later than June 24, 2015.

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 to resolve delay:

The Remediation Actions must be completed no later than December 17, 2015.

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

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Input Field	Description
Reasons for Delay	Enter the reasons for the delay of this activity—i.e., why no funds have been drawn and/or why no accomplishments have been reported.
Remediation Actions to be taken to resolve delay	Identify the short-term actions that will be taken to move the activity forward. At a minimum, provide a timeline for drawing funds and/or reporting accomplishments and the date you expect to complete the activity.
Target Completion Date of Remediation Actions	Enter the date by which you expect the remediation actions to have been completed.

When you are finished, clicking either the [Save and Next] or [Save and Return to List] button saves the plan and submits it to your Field Office for review. [Save and Next] displays a refreshed input screen for the next activity in the list; [Save and Return to List] takes you back to the list of activities.

If you haven't entered any data or do not want to save and submit your input, click the [Return to List](#) or [Next](#) link at the bottom lower right of the page.

AWAITING FIELD OFFICE REVIEW

After you submit a remediation plan for an at risk activity, it is listed under the "Awaiting Field Office Review" section on the Review Activities screen:

Awaiting Field Office Review (1 Activity)							
Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Canadian 15425 CD	13542	2012/138	✘			7/16/15	Edit Remediate

Between the time a plan is submitted and the time the Field Office approves or rejects it, you may update the plan or confirm that the remediation actions you specified in the plan have been completed.

Click the [Edit](#) link in the last column to update the plan's REASONS FOR DELAY, REMEDIATION ACTIONS, and/or TARGET COMPLETION DATE. Click one of the [Save] buttons to apply your updates or one of the links to exit without saving.

If the remediation actions you outlined in a plan are completed before the Field Office approves or rejects the plan, you can click the [Remediate](#) link, scroll to the bottom of the screen, and check the box labeled I CONFIRM THAT THE REMEDIATION ACTIONS DESCRIBED ON THIS PAGE HAVE BEEN COMPLETED. When this action is taken, the activity is reclassified on the Activity Review screen as "Remediation Completed by Grantee but Plan is Still Awaiting Field Office Review."

REMEDIATION COMPLETED BY GRANTEE BUT PLAN IS STILL AWAITING FIELD OFFICE REVIEW

Activities are listed in this section if the grantee confirms completion of the remediation actions before the Field Office acts on the plan.

Remediation Completed by Grantee but Plan is Still Awaiting Field Office Review (1 Activity)							
Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action
1 Canute 14732 CD	12916	2011/55	✘	✘		6/16/14 ▲	View

AWAITING GRANTEE'S COMPLETION OF REMEDIATION ACTIONS

Once the Field Office approves a remediation plan for an at risk activity, it is listed under the "Awaiting Grantee's Completion of Remediation Actions" section on the Review Activities screen. The DUE DATE for confirming that the actions have been completed is shown in the next-to-last column:

Awaiting Grantee's Completion of Remediation Actions (2 Activities)								Overdue: 1
Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Due Date	Action	
1 Wewoka 14802 cd	12954	2011/74	✘	✘		3/31/15 ▲	Remediate	
2 Oaks 15062cd	13265	2011/162	✘	○		8/8/15	Remediate	

To confirm that the remediation actions you identified and the Field Office approved have taken place, click the Remediate link in the last column. At the bottom of the screen that is displayed, check the I CONFIRM THAT THE REMEDIATION ACTIONS DESCRIBED ON THIS PAGE HAVE BEEN COMPLETED box:

Review Activities (2 of 2)

CDBG

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Activity Name	IDIS Activity ID	Grantee Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc
Oaks 15062cd	13265		2011/162	✘	○	

On June 20, 2015, the Field Office reviewed the Reasons for Delay and approved the Remediation Plan.

The grantee must confirm the completion of the remediation action no later than August 8, 2015.

Reasons for Delay:
Changes in personel caused a lapse in activity.

Remediation Actions to be taken to resolve delay:
New GA in place now and project is back on track, and scheduled for a JUNE completion, and closeout in August.

Target Completion Date of Remediation Actions:

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

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If confirmation is not made by the DUE DATE, the activity will be marked as "Overdue" on the Activity Review screen. Although the TARGET COMPLETION DATE cannot be updated, you will be able to confirm the overdue plan when the remediation actions have been completed.

GRANTEE’S REMEDIATION PLAN WAS REJECTED BY THE FIELD OFFICE

If the Field Office disapproves a remediation plan, the activity is listed on the review screen under the category “Grantee’s Remediation Plan was Rejected by the Field Office.”

Grantee's Remediation Plan was Rejected by the Field Office (1 Activity)							
Activity Name	IDIS Activity ID	Project	1 Year No Draw	3 Year No Acc	80% Drawn No Acc	Review Date	Action
1 Eldorado 15412 CD	13523	2012/122	✘			6/20/15	View

When a remediation plan is rejected, you must either complete the activity or cancel it and reimburse all drawn funds. You should consult with your Field Office to determine the exact action to be taken.

PENDING AT RISK ACTIVITIES

An activity is placed on the "Pending at Risk" list if it is within three months of being flagged for no draws*, or if no accomplishments have been reported after two years and nine months, or if between 66% and 79% of the funded amount has been drawn and no accomplishments have been reported.

Pending at Risk (13 Activities)						
	Activity Name	IDIS Activity ID	Project	270 Days No Draw	2 yr 9 Mos No Acc	66% Drawn No Acc
1	Elmore City 15076 CD	13285	2011/166	○	○	
2	Cherokee County 15095 CD	13303	2011/172		○	
3	Manitou 15090cd	13312	2011/182	○	○	
4	Hennessey 15097CD	13326	2011/190		○	
5	Ada 15242 CD	13420	2012/95	○		
6	Chickasha 15294 CD	13444	2012/111	○		
7	Bokchito 15295 CD	13446	2009/275	○		
8	Afton 15461 CD	13593	2012/149	○		
9	Okay 15565 CD	13639	2013/18	○		
10	Atoka-16098-CD	13818	2013/130	○		
11	south coffeyville 14139 cd	12183	2010/19	○		
12	Milburn 15087cd	13316	2011/186		○	
13	Pawnee 14557 cd	12675	2010/226	○		

Pending at Risk activities are identified so you can address them before they are flagged.

*An admin/planning activity is posted on the Pending at Risk list if there have been no draws for 1,000 days. A non-admin/planning activity is listed if there have been no draws within 635 days of the initial funding date; once funds have been drawn for the activity, it is identified as Pending at Risk 270 days after the date of the last draw.