

Consolidated Planning Process

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Administering Agency: HUD's Office of Community Planning and Development (CPD)

Year Started: 1990 as the Comprehensive Housing Affordability Strategy (CHAS), significantly modified in 1995 as the Consolidated Plan

The Consolidated Plan, popularly called the ConPlan, is a tool advocates can use to influence how federal housing and community development dollars are spent in their communities. The ConPlan merges into one process and one document all the planning and application requirements of five HUD block grant programs: Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG), Housing Opportunities for Persons With AIDS (HOPWA), and national Housing Trust Fund (HTF). States, large cities, and urban counties that receive any of these grants must have a ConPlan. In addition, Public Housing Agency Plans (PHA Plans) must be consistent with the ConPlan.

History

The statutory basis for the ConPlan is the Comprehensive Housing Affordability Strategy (CHAS), a provision of the "Cranston-Gonzalez National Affordable Housing Act of 1990." CHAS established a state and local planning process that required a housing needs analysis and assignment of priorities for addressing those needs. To receive CDBG, HOME, ESG, or HOPWA dollars, jurisdictions had to have a CHAS. In 1995, HUD amended the CHAS regulations to create the ConPlan; there is no ConPlan statute.

The ConPlan regulations interwove the planning, application, and performance reporting processes of the four block grants and the

CHAS, resulting in one long-term plan (the Strategic Plan), one application document (the Annual Action Plan), and one set of performance reports, the Consolidated Annual Performance and Evaluation Report (CAPER), which no longer includes CDBG's Grantee Performance Report (GPR). The HTF was added to the ConPlan in 2015 when the regulations implementing the HTF required the HTF Allocation Plan to be integrated into a state's Strategic Plan and Annual Action Plans.

Summary

Jurisdictions develop ConPlans at least once every three to five years (most chose five years) in the form of the long-term Strategic Plan. Jurisdictions must prepare Annual Action Plans during that period to show how resources will be used in the upcoming year to address Strategic Plan priorities. The regulations are at [24 CFR Part 91](https://www.ecfr.gov/current/title-24/chapter-I/subchapter-B/part-91): <https://bit.ly/3Goo3Xb>.

THE SEVEN KEY CONPLAN ELEMENTS

1. Housing and Community Development Needs: The ConPlan must estimate housing needs for the upcoming five years. It must also describe "priority non-housing community development needs." According to the regulations, the needs in the ConPlan should reflect the public participation process and the ideas of social service agencies, must be based on U.S. Census data, and "shall be based on any other reliable source." NLIHC's [Out of Reach](https://nlihc.org/oor): <https://nlihc.org/oor> and "Housing Needs by State": <https://nlihc.org/housing-needs-by-state> (select "Resources") are excellent sources of data.

The ConPlan must estimate housing needs by:

- ◀ Income categories, including households with income: less than 30% of the area median income (AMI) or less than the federal poverty line, called "extremely

low-income;" between 30% and 50% of AMI (low-income); between 50% and 80% of AMI (moderate-income); and between 80% and 95% of AMI (middle-income).

- ◀ Tenure type (whether the household rents or owns).
- ◀ Family type, including large families (five or more people), individuals, and elderly households.
- ◀ A summary of the number of people who: have a housing cost burden (pay more than 30% of their income for rent and utilities) or severe cost burden (pay more than 50% of their income for rent and utilities); live in very poor-quality housing; or live in overcrowded housing. Each of these characteristics must be presented by income category and by tenure type.

The ConPlan must estimate the housing needs of:

- ◀ Domestic violence survivors,
- ◀ Persons with disabilities,
- ◀ Persons with HIV/AIDS and their families, and
- ◀ Persons who were formerly homeless and receive rapid re-housing assistance that is about to expire.

The ConPlan must also estimate:

- ◀ The need for public housing and Housing Choice Vouchers (Section 8), referring to waiting lists for those programs.
- ◀ The supportive housing needs of people who are elderly, have physical or mental disabilities, have addiction problems, are living with HIV/AIDS, or are public housing residents.
- ◀ The number of housing units containing lead-based paint hazards occupied by low-income households.
- ◀ The needs of any racial or ethnic group if their needs are 10% greater than all people in the same income category.

The ConPlan must describe the nature and extent of homelessness, addressing:

- ◀ The number of people experiencing homelessness on any given night, the number who experience homelessness each year, and the number of days people are homeless.
- ◀ The nature and extent of homelessness by racial and ethnic groups.
- ◀ The characteristics and needs of people, especially extremely low-income people, who are housed but who are threatened with homelessness.

2. Housing Market Analysis: The housing market analysis requires a description of key features of the housing market, such as the supply of housing, demand for housing, and the condition and cost of housing. It must also have an inventory of facilities and services for people experiencing homelessness, with categories for permanent housing, permanent supportive housing, transitional housing, and emergency shelters. A description of facilities and services for people who are not homeless but require supportive housing must be included, along with a description of programs ensuring that people returning from mental and physical health institutions receive supportive housing.

Localities (not states) have additional requirements:

- ◀ A description of the housing stock available to people with disabilities, HIV/AIDS, or special needs.
- ◀ An estimate of the number of vacant or abandoned buildings, with an indication of whether they can be rehabilitated.
- ◀ A narrative or map describing areas where low-income people and different races and ethnic groups are concentrated.
- ◀ A list of public housing developments and the number of units in them, along with a description of their condition and revitalization needs.

- ◀ A description of the number of units assisted with other federal (e.g., Project-Based Section 8), state, or local funds, including the income levels and types of families they serve.
- ◀ An assessment of whether any units are expected to be lost, such as through Section 8 contract expiration or Low-Income Housing Tax Credit (LIHTC) units that no longer must house lower income households after the 30-year affordability period.

3. **Strategic Plan:** This long-term plan must be done at least every three to five years (most jurisdictions chose five years). It must indicate general priorities for allocating CPD money geographically and among different activities and needs (“CPD money” is used here to refer to each of the five block grant programs administered by CPD subject to the ConPlan). The Strategic Plan must describe the rationale for the fund allocation priorities given to each category of priority needs among the different income categories. Needs may refer to types of activities, such as rental rehabilitation, as well as to demographic groups, such as extremely low-income renter households. Although the regulations do not specifically require it, past HUD guidance required jurisdictions to assign to each priority need a relative priority of high, medium, or low. Since August 2012, HUD has only required priority assignments of high or low priority. The ConPlan must identify proposed accomplishments in measurable terms and estimate a timetable for achieving them.

For housing, the regulations add that the Strategic Plan must explain the reasoning behind priority assignments, the proposed use of funds, and how the reasoning relates to the analysis of the housing market, the severity of housing problems, the needs of the various income categories, and the needs of renters compared to owners. The number of families who will receive affordable housing must be shown by the income categories of

extremely low, low, and moderate. The Strategic Plan must also describe how the need for public housing will be met.

Priority homeless needs must be shown. The Strategic Plan must also describe strategies for reducing and ending homelessness by helping people to avoid becoming homeless, reaching out to homeless people to determine their needs, addressing needs for emergency shelter and transitional housing, and helping homeless people make the transition to permanent housing.

For people with special needs who are not homeless, the Strategic Plan must summarize the priority housing and supportive service needs of people who are elderly or who have disabilities (mental, physical, or developmental), HIV/AIDS, alcohol or drug addiction, or who are public housing residents.

For jurisdictions receiving CDBG funds, the Strategic Plan must summarize non-housing community development needs, such as daycare services, health centers, parks, roads, and commercial development.

- 4. **Anti-poverty Strategy:** The statute calls for a description of goals, programs, and policies for reducing the number of people with income below the poverty level. It also requires a statement of how affordable housing programs will be coordinated with other programs and the degree to which they will reduce the number of people in poverty.
- 5. **Lead-based Paint:** The Strategic Plan must outline actions to find and reduce lead paint hazards.
- 6. **Fair Housing:** Each year the jurisdiction must certify that it is affirmatively furthering fair housing (AFFH). Under the first Trump Administration, HUD suspended the 2015 Affirmatively Furthering Fair Housing (AFFH) rule, so instead of carrying out that rule’s AFFH and related ConPlan provisions, virtually every jurisdiction must follow the flawed Analysis of Impediments (AI) to fair housing choice process – until HUD reinstitutes an

AFFH rule. (A final AFFH rule was stalled through much of 2024 and is not likely to be published, but if it is, it would likely be suspended by the second Trump Administration). The flawed Analysis of Impediments (AI) to fair housing choice process simply requires that a jurisdiction has an AI, is taking appropriate actions to overcome the effects of impediments and keeps records. The AI is not required to be a part of the Strategic Plan or Annual Action Plan. Although HUD's official 1996 [Fair Housing Planning Guide: https://bit.ly/3YMKBam](https://bit.ly/3YMKBam) says an AI "must be completed/updated in accordance with timeframes for the Consolidated Plan," a September 2004 memorandum says that each jurisdiction "should maintain its AI and update the AI annually where necessary." See the *Affirmatively Furthering Fair Housing* article.

7. Annual Action Plan: The Annual Action Plan must describe the amounts of all federal resources reasonably expected to be available in the coming year, including those in addition to CDBG, HOME, ESG, HOPWA, and HTF, such as Low-Income Housing Tax Credits (LIHTCs), Continuum of Care (CoC) funds, and Housing Choice Vouchers. The Annual Action Plan must also indicate other private and local and state resources expected to be available. The geographic areas that will get assistance in the upcoming year must be indicated, and the Annual Action Plan must give reasons why these areas have priority.

Local jurisdictions' Action Plans must describe the activities and amount of assistance to be provided to each activity that a jurisdiction plans to carry out in the upcoming year and the reasons for making these choices. Local jurisdictions must describe the use of CDBG for each activity in enough detail, including location, to enable people to determine the degree to which they could be affected.

State Action Plans must describe their method for distributing funds to local governments and nonprofits, or the activities the state will

undertake itself. States must describe the criteria used to select CDBG applications from localities. States must also describe how all CDBG money will be allocated among all funding categories (e.g., housing, economic development, public works, etc.).

The Action Plan must have an estimate of the number and type of households expected to benefit from the use of CPD funds (this does not apply to states). In addition, based on any funds available to the jurisdiction, the Action Plan must specify one-year goals for the number of non-homeless, homeless, and special needs households to be provided affordable housing through new construction, rehabilitation, acquisition, and rental assistance.

The Annual Action Plan must indicate the activities that will be carried out in the upcoming year to reduce homelessness by: preventing homelessness, especially for those with income less than 30% of AMI, meeting emergency shelter and transitional housing needs, helping people make the transition to permanent housing and independent living, and meeting the special needs of people who are not homeless but have supportive housing needs.

THE FIVE STEPS OF THE CONPLAN CALENDAR

1. Identify Needs: The CDBG and CHAS laws require a public hearing to gather the public's ideas about housing and community development needs. HUD's regulations require this hearing to take place before a proposed Strategic Plan or Annual Action Plan is published for comment.
2. Proposed ConPlan Strategic Plan or Annual Action Plan: There must be a notice in the newspaper that a proposed Strategic Plan or Annual Action Plan is available. Complete copies of the proposed Strategic Plan or Annual Action Plan must be available in public places, such as libraries. A reasonable number of copies of a proposed Stra-

tegic Plan or Annual Action Plan must be provided at no cost. There must be at least one public hearing during the development of the Strategic Plan or Annual Action Plan (this does not apply to states). The public must have at least 30 days to review and comment on the proposed Strategic Plan or Annual Action Plan.

3. Final ConPlan Strategic Plan or Annual Action Plan: The jurisdiction must consider the public's comments about the proposed Strategic Plan or Annual Action Plan, attach a summary of the comments to the final Strategic Plan or Annual Action Plan, and explain in the final Strategic Plan or Annual Action Plan why any suggestions were not used. The final Strategic Plan or Annual Action Plan must be sent to the CPD Field Office at least 45 days before the start of a jurisdiction's "program year." Program years vary from jurisdiction to jurisdiction – most start on July 1 and a number start on October 1. A copy of the final Strategic Plan or Annual Action Plan must be available to the public.

HUD can disapprove the final Strategic Plan or Annual Action Plan for several reasons, including if a jurisdiction did not follow the public participation requirements, did not "satisfy all of the required elements," or if the jurisdiction provided an inaccurate certification (for example, if HUD finds that a jurisdiction's certification that it took appropriate actions to overcome impediments to fair housing is not accurate).

4. The Annual Performance Report: In this report a jurisdiction shows what it did during the past year to meet housing and community development needs. The report must include: a description of the money available and how it was spent; the location of projects; and the number of families and individuals assisted, broken down by race and ethnicity as well as by income category, including income less than 30% of AMI. For CDBG-assisted activities, the performance report must describe the assisted activities

and explain how they relate to the ConPlan priorities, giving special attention to the highest priority activities. The Annual Performance Report must describe the actions taken to affirmatively further fair housing.

There are several public participation features related to the Annual Performance Report. There must be reasonable notice that a report is completed, and the report must be available to the public. The public has only 15 days to review and comment on it; nevertheless, the jurisdiction must consider public comments and attach a summary of the comments.

The annual performance reporting requirements of the five block grant programs have been merged into a set of computer-based records, the Consolidated Annual Performance and Evaluation Report (CAPER) for local jurisdictions and the Performance and Evaluation Report (PER) for states. They must be submitted to the CPD Field Office 90 days after the close of a jurisdiction's program year. These performance reports only offer a general, aggregate picture of what a jurisdiction accomplished. Although no longer a part of the CAPER, local jurisdictions receiving CDBG must still complete a Grantee Performance Report (GPR), which also goes by the term IDIS Report PR03 ([IDIS stands for Integrated Disbursement and Information System: https://www.hudexchange.info/programs/idis/](https://www.hudexchange.info/programs/idis/)). The GPR should provide detailed information about each activity funded by CDBG. Although many jurisdictions do not make the GPR known to the public, it must be provided if requested – and advocates should request the latest GPR.

5. Amendments to the ConPlan or Annual Action Plan: The ConPlan or Annual Action Plan must be amended if there are any changes in priorities, or in the purpose, location, scope, or beneficiaries of an activity, or if money is used for an activity not mentioned in the Annual Action Plan. If there is a "Substantial Amendment," then public participation similar to that for Annual Performance Reports is

required, but with a 30-day comment period. HUD allows a jurisdiction to define Substantial Amendment. At a minimum, the regulations indicate that a Substantial Amendment must include a change in the use of CDBG funds, and a change in the way a state allocates CDBG money to small towns and rural areas.

PUBLIC PARTICIPATION

In addition to the public participation requirements mentioned in the previous paragraphs, each jurisdiction must have a written “citizen participation plan” available to the public. The plan must provide for and encourage public involvement in the creation of the ConPlan Strategic Plan or Annual Action Plan, review of the Annual Performance Report, and any Substantial Amendment. It must encourage involvement by people with low incomes, especially in low-income neighborhoods and areas where CDBG money might be spent. Jurisdictions “are expected to take whatever actions are appropriate to encourage the participation of all of its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.” Jurisdictions must also encourage involvement by residents of public and assisted housing.

There must be reasonable and timely access to information and records relating to the Strategic Plan or Annual Action Plan. The public must be able to review records from the previous five years related to the ConPlan and any use of federal money covered by the ConPlan. For local jurisdictions (not states) the public must have reasonable and timely access to local meetings, such as community advisory committee meetings and city council meetings.

Public hearings must be held after adequate notice to the public. “Publishing small print notices in the newspaper a few days before the hearing is not adequate notice,” according to the regulations, but “two weeks’ notice is adequate.” Public hearings must be held at times and places convenient for people with low incomes. Where there are a significant number

of people with limited English proficiency, the public participation plan must show how they can be involved. The jurisdiction must give written, meaningful, and timely responses to written public complaints; 15 days is considered timely if the jurisdiction gets CDBG funding.

CONPLAN TEMPLATE AND MAPPING TOOLS

Jurisdictions must submit ConPlan Strategic Plans, their subsequent Annual Action Plans, and CAPERs electronically using an electronic template tied into CPD’s management information system, known as IDIS.

The template is a combination of data tables and narratives that set a baseline of HUD’s expectations for the type and amount of information required. Jurisdictions can customize their templates by adding additional text, data, or images from other sources. The data tables required by the regulations pertaining to housing and homelessness needs and the housing market are automatically pre-populated with the required data; however, jurisdictions may substitute better data if they have it. Some of the data includes the five-year American Community Survey data from the Census Bureau, special Census CHAS tabulations, public housing resident characteristics from HUD’s [Picture of Subsidized Housing: https://www.huduser.gov/portal/datasets/assthsq.html](https://www.huduser.gov/portal/datasets/assthsq.html), and business and employment data from the Census.

Most jurisdictions’ ConPlans are [posted: https://cpd.hud.gov/cpd-public/consolidated-plans](https://cpd.hud.gov/cpd-public/consolidated-plans) on HUD’s ConPlan website: <https://www.hudexchange.info/programs/consolidated-plan/>. Advocates will benefit from reviewing the [Con-Plan Desk Guide: https://bit.ly/4jGt6AO](https://bit.ly/4jGt6AO) containing the components of the template because it outlines the regulatory requirements that jurisdictions must follow and because it helps advocates know what the various template tables should look like (especially starting on page 78 of the June 2021 version, with the Strategic Plan on page 167, Action Plan on page 203, and CAPER

on page 253). Unfortunately, advocates cannot use the template to electronically create their own alternative ConPlan because only jurisdictions have access to IDIS. Nevertheless, the Desk Guide provides advocates an outline of what jurisdictions must submit that advocates can use to manually fashion their own ideal ConPlan to promote prior to the public participation process.

CPD also has a [mapping tool: https://egis.hud.gov/cpdmaps/](https://egis.hud.gov/cpdmaps/) that allows both grantees and members of the public to access a large amount of data in a relatively user-friendly, web-based format. Jurisdictions are not required to use the maps. Users can search, query, and display information on the map that will help them identify trends and needs in their communities. Some of the features available on the mapping tool include the capacity to show where CDBG and HOME activities have been provided and where public housing and private, HUD-assisted housing and LIHTC housing is located. It is also possible to see housing, economic, and demographic characteristics of an area down to the census tract level. The web-based software enables advocates to draw custom geographies, such as neighborhood boundaries, which might not fit neatly into census tracts.

THE CONPLAN AND THE NATIONAL HOUSING TRUST FUND

The national Housing Trust Fund (HTF) statute requires states to prepare an Allocation Plan each year showing how the state will allot the HTF dollars it will receive in the upcoming year. Each state must distribute its HTF dollars throughout the state according to the state's assessment of priority housing needs as identified in its approved ConPlan.

HTF advocates should determine which state agency is responsible for drafting the HTF Allocation Plan (available on [HUD's HTF website: https://www.hudexchange.info/programs/htf/grantees/](https://www.hudexchange.info/programs/htf/grantees/), at [HUD Exchange: https://bit.ly/42u9hqL](https://bit.ly/42u9hqL), and on [NLIHC's HTF website](#)). It is probably not the same agency that drafts the ConPlan Strategic Plan or

Annual Action Plan. Advocates should inform the ConPlan agency (if it is different than the HTF state agency) that they are interested in participating in the process for planning where and how HTF money will be used.

Although the HTF statute requires public participation in the development of the HTF Allocation Plan, the HTF interim rule does not explicitly declare that, in order to receive HTF money, states must develop their Allocation Plans using the ConPlan public participation rules. It merely requires states to submit an HTF Allocation Plan following the ConPlan rule, which does have public participation requirements. Most state HTF Allocation Plans are found in a section of the Strategic Plan or Annual Action Plan concerning "program-specific" information toward the end of the document at "AP-90 Program Specific Requirements," under "Housing Trust Fund (HTF)." Some states place their HTF Allocation Plan in an appendix to the Strategic Plan or Annual Action Plan.

Action around the HTF Allocation Plan takes place at the state level. For advocates only accustomed to ConPlan Strategic Plan or Annual Action Plan advocacy at the local level because a locality gets CDBG and HOME directly from HUD, the state HTF process will be an important new experience. To better ensure that HTF dollars are used properly, it might be necessary for advocates to learn how to influence their state ConPlan.

The interim HTF rule requires states receiving HTF dollars to submit a performance report according to the ConPlan regulations. The HTF performance report must describe HTF program accomplishments, and the extent to which the state complied with its approved HTF Allocation Plan and all of the requirements of the HTF rule.

Tips for Local Success

The ConPlan is a potentially useful advocacy tool for directing funds toward activities more beneficial to people with low incomes because

jurisdictions must provide for and encourage public participation, particularly by people with low incomes. Advocates and residents should monitor the needs assessment and priority setting processes, making sure that all needs are identified and assigned the level of priority they deserve. With the mapping tool, advocates can add information and data that a jurisdiction might not include, such as data from studies conducted by local universities. Advocates can also devise an alternative plan using the mapping tool to draw neighborhood boundaries that more realistically reflect community dynamics. Through the Annual Action Plan's public participation process, advocates and residents can strive to ensure that federal dollars are allocated to activities that will truly meet the high priority needs of low-income people.

Forecast for 2025

On January 10, 2024, CPD published proposed changes to the ConPlan as part of a larger set of proposed changes to the CDBG regulations. In addition to the current rule's requirement that an Entitlement Jurisdiction consider a change in the use of CDBG funds from one eligible activity to another to be a substantial amendment, CPD proposed adding that an activity not previously identified in the ConPlan Strategic Plan or an Annual Action Plan to the Strategic Plan is a "substantial amendment."

The ConPlan "citizen" participation regulations require jurisdictions to "publish" a draft ConPlan Strategic Plan or Annual Action Plan in general circulation newspapers so that residents can examine the draft and submit comments. It also requires a summary of the draft document and a list of locations where complete copies can be examined, such as libraries, government offices, and public places. CPD proposed requiring the drafts to also be posted on a jurisdiction's official website. In addition to a summary, the proposed rule "encourages" jurisdictions to use all available social media and electronic communication, such as emails, text

messages, media advertisement, public service announcements, pre-recorded messages delivered via automatic telephone dialing systems, and electronic notices to public and private organizations. The proposed rule offers grocery store bulletin boards and neighborhood centers as examples of public places. The proposed rule explicitly reminds jurisdictions that publications must be accessible to people with disabilities and to people with limited English proficiency.

A final version of the proposed rule reached the Office of Information and Regulatory Affairs (OIRA), a part of the Office of Management and Budget (OMB) on October 18, 2024. As of the date *Advocates' Guide* went to press, a final rule had not been published in the *Federal Register*.

For More Information

NLIHC, 202-662-1530, www.nlihc.org.

HUD Consolidated Plan on HUD Exchange <https://www.hudexchange.info/programs/consolidated-plan>.

Consolidated Plan on HUD's basic website, https://www.hud.gov/program_offices/comm_planning/conplan.

eCon Planning Suite is at <https://www.hudexchange.info/consolidated-plan/econ-planning-suite>.

ConPlan template Desk Guide, <https://www.hudexchange.info/resource/2641/econ-planning-suite-desk-guide-idis-conplan-action-plan-caper-per>.

ConPlan mapping tool, <https://egis.hud.gov/cpdmaps> and CPD Maps Desk Guide, <https://www.hudexchange.info/resource/2405/cpd-maps-desk-guide>.

Find jurisdictions' ConPlan Strategic Plans and Annual Action Plans at <https://cpd.hud.gov/cpd-public/consolidated-plans>.

End of year reporting is at <https://www.hudexchange.info/programs/idis/idis-reporting>.