

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF FINANCIAL ASSISTANCE****Community Development Block Grant Program**

2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833
P. O. Box 952054, MS 500
Sacramento, CA 94252-2054
(855) 333-CDBG (2324) / FAX (916) 263-2762

**CDBG MANAGEMENT MEMORANDUM**
Community Development Block Grant Program - Memorandum Number 15-01

January 21, 2015

MEMORANDUM FOR: Non-Entitlement Jurisdictions Eligible for State Community Development Block Grant (CDBG) Program

FROM: Thomas Brandeberry, CDBG Section Chief

SUBJECT: State CDBG Program Change on Elderly Activities

The purpose of this Management Memo is to announce a change in the Department's long standing policy regarding services for "elderly" beneficiaries under the Department of Housing and Urban Development's (HUD) Limited Clientele National Objective.

The groups presumed by HUD to be made up principally by low- and moderate-income persons include "elderly," per 24 CFR 570.483(b)(2)(ii)(A). Because federal CDBG regulations do not define "elderly," the State may define "elderly" for CDBG Public Services and/or CDBG Public Facilities.

In order to be consistent with other state and federal funding sources for elderly services (oftentimes referred to as senior services), the Department defines "**elderly**" as **anyone 60 years or older**. (Note that CDBG previously defined "elderly" as 62 years of age or above for the presumed Low/Mod Limited Clientele National Objective.)

This policy change will apply to all services and facilities presently being funded when the presumed Low/Mod Limited Clientele National Objective is used. The Department will also use this definition when evaluating all future CDBG activities, including NOFA and Program Income (PI) Waiver or Supplemental activities.

Please be aware that Grantees may only use the Low/Mod Limited Clientele Presumed National Objective for services provided to elderly beneficiaries under Public Services activities, and for Public Facilities activities that provide elderly services.

Note: *No income qualifying documentation (including self-certifications) is required for elderly public service activities that restrict services to 60 years or older.*

HUD defines “seniors” for housing as those aged 62 or older. All CDBG housing-related activities (for example, homebuyer assistance, housing rehabilitation, or multifamily rehabilitation), whether targeting seniors or the elderly (or any other population) must meet the Low/Mod Housing National Objective (LMH).

Also, the State’s Consolidated Plan requires the identification of housing needs for various groups, including the elderly (which is defined as 62 years of age or older). In order to count housing units as units meeting a Consolidated Plan senior housing goal, occupants must meet the definition of 62 years or older.

Questions concerning this Management Memo should be directed to your Contract Management [Representative](#).