

Community Block Development Grant Coronavirus (CBDG-CV) Frequently Asked Questions (FAQs)

[February 28th, 2022]



Community Development Block Grant Coronavirus (CDBG-CV) FAQs

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Version Number	Date	Amendments
1.0	10/8/2021	Compiled questions from Office Hours and Grantee emails
2.0	02/28/2022	Updated with questions from Office Hours and Grantee emails through Version 2.0

NOFA, Grantee Application and Award Process

- 1. When will the 2020 Census Data be available in fact finder and when will the community low-income household percentages will be available through the California Department of Housing and Community Development (HCD) website?**

Low to Moderate Income Area data is generally released after the Census data is initially released. Census data was released 8/16/21. HUD's Office of Policy Development and Research (PD&R) will have to run the new census data and post it to the website. There is more recent Low- and Moderate-Income Summary (LMSI) data put out from the American Community Survey (ACS). [FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange](#).

Applicability: CDBG & ESG Programs

- 2. If a Grantee that received CDBG-CV1 or CDBG-CV2&3 funding is finding that the program they applied for is not being utilized as much as anticipated is there an opportunity for the Grantee to reallocate the funds to another eligible CV2&3 activity?**

Contact your Grant Administrator or HCD Representative about this to discuss the details of the challenges that you are facing, they will walk you through the potential of filing an amendment or revision.

Applicability: CDBG & CDBG-CV Program

- 3. Will a public hearing be required for CV1 closeout? How should folks proceed if they funded the same activity with CV2/3 funds, so the program as a whole is staying "open" and is not necessarily ready for a closeout.**

HCD requires grantees to hold a second public hearing during or at completion of the CDBG-CV activity. The grantee may elect to conduct the 2nd hearing for the CV1 award at one of two stages:

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1. Conduct the hearing at closeout of the CDBG-CV1 award, collect feedback on program operation at this mid-point to inform implementation of the CDBG-CV2/3 award and indicate that the program remains open OR:
2. Delay conducting the second hearing until the close-out of the CDBG-CV2/3 award and use the hearing as an opportunity to discuss total program accomplishments.

Keep in mind that each individual award will need to be closed in accordance with the provisions of the Standard Agreement, which includes passage of a resolution at grant close-out. Also, Standard Agreement Exhibit B – Budget Detail and Payment Provisions 6. Grant Closeout - Section A(4) includes the requirement for a resolution from the governing body acknowledging the accomplishments of the activity and confirming that the activity is complete and that all outstanding funds have been reimbursed by the Department. This resolution is required for EACH Standard Agreement; therefore, the grantee should coordinate both the public hearing and resolution requirements.

Applicability: CDBG & CDBG-CV Program

- 4. We are operating a business assistance program with our CDBG-CV funds. Since the impact of the pandemic is still being felt, we plan on expanding impacts into 2022 once folks start filing their tax returns. Will assisted businesses who did not receive the full capped award, be eligible to receive a second disbursement up to that cap amount?**

This is subject to how the local program devised the program. Please refer to the program guidelines of the activity. As long as the amount of assistance does not exceed the stated benefit cap, as prescribed by the program, then it should be okay.

However, it is possible that the program guidelines will need to be amended. If this is the case, you can submit an amendment form to allow for new assistance to offset new losses to businesses that have already been awarded. For specific confirmation, please reach out to your CDBG representative and your Grant administrator for support.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

National Objectives, Eligible Activities, and Eligible Costs

General

- 5. What is the Low- to Moderate- Income (LMI) national objective and how does it apply to this program?**

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All CDBG-CV projects must meet a national objective. Projects funded in this program must meet a low- to moderate- income (LMI) national objective (either through area benefit activities, limited clientele activities, housing activities, or job creation or retention activities). If a project cannot meet an LMI national objective, Grantees should reach out to their HCD representative to understand if their project can meet the urgent need national objective.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

6. When does low-to-moderate income Area Benefit (LMA) apply?

The requirements for meeting the LMA national objective can be found at [24 CFR 570.483\(b\)\(1\)](#). Generally, a project may qualify under LMA when the activity:

- Benefits a primarily residential area, where at least 51 percent of the residents are low- and moderate-income persons
- The services of the project are available to the entire area
- The determination that the service area is primarily LMI is supported by Census data and/or survey data

Applicability: CDBG & CDBG-CV Programs

7. How do I know if my county's activity provides a low- to moderate-income (LMI) area benefit (LMA)?

A LMI area benefit project activity is one that benefits all the residents in an area where at least 51% of the residents are LMI persons. To determine if your project will provide an LMI area benefit (LMA) you will need to identify:

- 1) The project's service area;
 - a) Consider accessibility when determining the service area
 - b) Consider whether there are comparable services within the service area
- 2) Confirm the area is primarily residential;
- 3) Confirm the project's services are available to all the residents in the service area;
- 4) Use Census data, surveys, or a combination of Census data and survey to determine the percentage of LMI residents in the service area.
 - a) Resource: [FY 2021 ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data - HUD Exchange](#)

Applicability: CDBG & CDBG-CV Programs

8. How do I know if my county's activity provides a low- to moderate-income limited clientele benefit (LMC)?

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An LMC benefit activity provides benefits to a specific group of people, the majority of whom are LMI persons. Projects meeting this national objective must meet one of the following tests:

- Benefit a clientele that is generally presumed to be principally LMI. This presumption covers abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS and migrant farm workers; or
- Require documentation on family size and income to show that at least 51 percent of the clientele are LMI; or
- Have income eligibility requirements limiting the activity to LMI persons only; or
- Be of such a nature and in such a location that it can be concluded that clients are primarily LMI. An example is a day care center that is designed to serve residents of a public housing complex.

Providing assistance to a microenterprise may qualify under LMC if:

- The business employs 5 or fewer employees, one or more of whom is the owner; and
- The owner(s) are LMI persons

Applicability: CDBG & CDBG-CV Programs

9. How do I know if my activity provides a low- to moderate-income housing benefit (LMH)?

An activity that meets the LMH national objective is one that provides assistance for housing or improves permanent residential structures that will be occupied by LMI households. To determine if your project will provide an LMH benefit you will need individual income documentation for the beneficiaries of the project, including the occupants of all units in a multi-unit structure. A LMI household must occupy a structure with one unit. Two-unit structures must have at least one unit occupied by a LMI household. If the structure contains three or more units, at least 51 percent must be LMI occupied.

Applicability: CDBG & CDBG-CV Programs

10. Is Part 5 income eligibility required for CDBG-CV funded programs? If not, what is the alternative eligibility requirement and method of determination?

For all activities other than microenterprise assistance, grantees must use Part 5 Income eligibility methodology to verify income.

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Grantees may choose to use Part 5 Income Eligibility or the Adjusted Gross Income (AGI) methodology to verify the income of the business owners to satisfy LMCMC requirements for microenterprise assistance only.

Grantees must apply their methodology consistently within their microenterprise assistance program.

AGI, also known as IRS 1040, reported on the most recent year's tax return can be used to determine income for CDBG-CV purposes. That would be the sole file documentation required to verify the owner's household income is at or below 80% AMI.

If the most recent tax return is not available, the program can use the prior year's return along with verification that an extension has been requested. This would involve checking back with the applicant to re-verify income once the 2020 return has been filed and prior to determination of eligibility.

Individuals on social security, social security disability (SSDI), or Veteran's disability, can use the benefit letter received annually to verify income, as long as it is the current year's benefit letter. For these individuals it is also important to determine if they receive any additional income (e.g., retirement, interest income, annuity, etc.)

If the tax returns and/or benefit letters are unavailable, it is possible to document income in the following manner:

- Pay stubs (2 to 3 current, consecutive prior to application – 90 days)
- W2 or 1099 – most recent tax year
- Quarterly IRS Report or W-9 (Self-employment; Business owner)
- Bank statements (3 months)
- Savings Acct.; Money Market Acct.; Certificate of Deposit (1 month)
- Asset statements (stocks, bonds, earned interest)
- Temporary Assistance to Needy Families (TANF) Award notification
- Aid to Families with Dependent Children (AFDC) Award notification
- Section 8 Voucher Program contract

Grantees should be reminded that the annual income of ALL members of the household 18 years of age and older (related and unrelated) must be used to calculate household income. Those 18 and older with no income should be required to complete a "Zero Income Certification" for the file.

Grantees/subrecipients should define the process they use for verifying household income for their microenterprise program in their program policy. They must apply their methodology consistently and cannot change methodologies within a program. HUD's Income Eligibility Calculator can be used as a tool to calculate the AGI.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

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Economic Development

11. How do I know if my county's activity provides a low- to moderate-income job creation or retention benefit (LMJ)?

An activity meets the LMJ national objective if it creates or retains permanent jobs where at least 51% of those jobs are made available to or held by LMI persons.

Programs funded with CDBG-CV or 2019/2020 CDBG that are responding to, preventing, or recovering from coronavirus can follow the alternative requirements for documenting the income status of jobs, as described in the [HUD CDBG-CV Economic Development Quick Guide](#).

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

12. Are businesses required to obtain a Sam.Gov registration and obtain a DUNS number to receive the funds from a subrecipient?

Yes, all entities assisted with CDBG funds must have both a Data Universal Numbering System (DUNS) number and Sam.gov registration under Federal programs. A DUNS number is needed as part of the debarment check so this must be completed before an award can be given to a business. If you have a need for technical assistance to understand the process, please reach out to your Grant Administrator or HCD Representative. To retain eligibility, assisted businesses must be updated annually. All contractors must also register on SAM.gov and update annually.

Applicability: CDBG & CDBG-CV Programs

13. My county is providing business assistance as a grant. Do we need a subrogation agreement?

Yes. The subrogation agreement protects Grantees and subrecipients in the event there is a duplication of benefit that was not identified during application review and in the event a program recipient receives assistance that is duplicative in the future. Providing duplicative assistance (e.g., assistance provided by more than one funding source for the same activity/purpose/cost) is ineligible, and if a Duplication of Benefits (DOB) is identified, then the Grantee or subrecipient may be required to return federal funds. The subrogation agreement serves as a legal certification and obligation for the recipient to report and repay any duplicative funds if a DOB is identified after the award is made.

Applicability: CDBG & CDBG-CV Programs

14. In [Appendix H: Program Expectations for Economic Development Activities](#) under terms of forgiveness, it states that

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“award may be structured as a grant with award conditions”. What conditions are being referred to here? Is there something specific that needs to be included in the grant agreement besides what they are using it for is eligible?

Regardless of the award structure, businesses will be required to meet the requirements of receiving CDBG-CV assistance including, but not limited to, complying with all applicable federal cross cutting requirements, subrogation agreement, meeting a national objective, documenting eligible uses of funds (per Grantee program guidelines), submitting required reports, etc. Agreeing to comply with all the requirements of the program are their “grant conditions.” It’s the stop-gap Grantees have in place to protect them in the event businesses don’t do what they’re supposed to do, and the funds are determined to be ineligible.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

15. Can a business use a grant to pay the next month’s rent if it is within 30 days, but no further than that?

Correct. Generally, CDBG-CV funds are to be used for reimbursement of costs incurred. HCD is allowing for minimal advances, but you can pay for back costs, as those costs have already been incurred and can more assuredly be documented. If you allow for advances, you will still need to document the eligible uses of funds in the file once those funds have been spent.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

16. Do all owners or just 51% of the owners of microenterprises have to be LMI in order for a business with 5 or less employees to qualify under LM Limited Clientele?

While many activities (such as public services) can meet the LM Limited Clientele national objective by providing services or activities that predominantly (51%) benefit LMI persons/households, meeting LMC for microenterprises does not include the 51% language, but instead refers to “owners of microenterprises...who are low- and moderate-income persons.” Therefore, all owners of the microenterprise must be LMI for the business to qualify under LMC.

Note: If there are multiple owners of the microenterprise, all must be LMI persons to qualify the business under LM Limited Clientele*. However, if all owners are not LMI, the microenterprise may still be able to qualify under another LM national objective such as LM Job Retention or Creation or LM Area.

Applicability: CDBG & CDBG-CV Programs

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17. Can the 5 employees needed to qualify a microenterprise business under LM Limited Clientele include the business owner and can it include part time employees?

The 5 employees do include the business owner and must compose a total of 5 full time employees or a mix of full time and part time employees. For this program, a 30-hour week or 1,560 hours per year will be considered full time. For a mix of part time and full-time employees, the applicant would need to aggregate all employee's weekly hours and divide by the definition of full time, and this must be equivalent to the hours for 5 full time employees.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

18. Under CDBG-CV HUD allows for a business owner to confirm income for a position/employee, rather than having them do a self-certification; could this documentation be as simple as an employee report that lists the name or position and the total salary for the year for that person? Does the owner need to sign it?

The Grantee should define the documentation that they require from businesses in their policies and procedures. The guidelines should also specify which documents require signature, though program document signatures must cover the accuracy and truthfulness of all information and documentation provided by the applicant.

Acceptable documentation for documenting employee income may include certified payroll registers, employee reports, and other documentation that covers multiple periods. The documentation should include details listed below so the Grantee can clearly determine the full-time equivalent (FTE) number of employees being created/retained and whether those employees are considered LMI or non-LMI:

- a) Position/job title
- b) Rate of pay, if paid hourly or salary, and frequency (weekly, bi-weekly, monthly, etc.)
- c) Average hours worked by an employee

You use the information in a-c to figure out the total FTEs whose salaries/annualized wages (based on average hours worked times hourly rate of pay times weeks worked in a year) that:

- Fall at or below the 80% AMI limit for a household of one (these are LMI jobs)
- Fall above the 80% AMI limit for a household of one (these are non-LMI jobs)

Once the Grantee has calculated the total number of FTE LMI and non-LMI jobs that have been retained, the Grantee can determine if the business primarily retained LMI jobs. Based on the information provided by the business, to determine if the business meets the

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LMJ Retention requirements, you'd total up all LM jobs retained and divide that by the TOTAL jobs retained to see if they met the 51% LMI jobs threshold.

Example:

- 4 FTEs, where the annual salary or annualized wages were at or below the 80% AMI limit for a household of one for the county
- 2 FTEs whose annual salary or annualized wages were higher than the 80% AMI limit for a household of one for the county
- 6 total FTEs, 4 of whom are LMI = 66.6% (4 divided by 6) LMI jobs retained, so the business meets the LMJ retention requirements

From there, you would calculate and review for compliance with your loan forgiveness or grant terms.

Applicability: CDBG-CV and FY 2019/2020 CDBG for coronavirus

19. An applicant for our forgivable loan program has some employees that would qualify as LMI by virtue of wages paid for that position (CV waiver), and some who would qualify as LMI through the standard method of household income. Can we use both methods within our program?

Yes, the Grantee, or its recipients could design a program which uses both approaches, when the use of either fairly demonstrates that the activity supports assistance primarily to low/moderate persons or families.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

20. Can a business seeking business assistance with CV funds use a portion of their CV loan to cover unpaid taxes? In these cases, the business is delinquent due to the pandemic and loss of revenue.

The revised Appendix H allows businesses to be eligible if they owe back-taxes (previously they were ineligible), provided the business is participating in an active repayment plan. However, the payment of back-taxes is not currently eligible. Grantees may pay for other working capital or operating expenses, including payroll, inventory, insurance, rent/mortgage, utilities.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

21. How should one properly confirm what past federal assistance has been used on? For instance, if a Small Business Administration (SBA) Economic Injury Disaster Loan (EIDL) is repaid, it isn't counted as income, so we don't see it show up on their P&L statement. Does

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a letter stating what past federal assistance was used for and signed by the owner suffice?

If the funding is from another federal funding source, the applicant should have a letter or award agreement from that federal agency with a description of the amount, the period of time of award coverage, and purpose of the award. Data on loans is searchable on the [SBA website](#) – you can also verify use of funds through this site. If the business applicant does not have the information already, they should be able to ask their funder for a letter or award notice that provides these details to the applicant.

Applicability: CDBG & CDBG-CV Programs

Subsistence Payment Programs

22. To what extent and/or what supporting documents are required for a self-certification Subsistence Program to determine income eligibility?

As a matter of practice, HUD acknowledges that it is lower risk for Grantees to collect income support documentation at the time of application intake. However, it is not a federal requirement. The Grantee can choose to use verifiable certification as an allowable process to document initial income eligibility, without collecting support documentation at the time of program intake. If the Grantee chooses to allow for verifiable certification, they must include the following in the program and application files:

- 1. Program Files:** If a Grantee or a Subrecipient chooses to allow for self-certification as their practice for subsistence payments, the Grantee should document the rationale in the program file for why full income support documentation is not feasible (e.g., factors related to the volume of applicant households, the amount of funding available, and the staff resources needed to verify income at the time of application would make the program cost-prohibitive and unreasonable to implement).
- 2. Project Files:** Within HUD's Guidance on Subsistence Type Payments of Rent or Mortgage Arrears, they replied to a related question with the text below:
 - According to 24 CFR 570.506(b), the Grantee may document income in several ways, including collecting a verifiable certification from the assisted person that his or her family income does not exceed the applicable income limit established in accordance with the regulations.
"Verifiable certification form," or 24 CFR 570.506(b) allows for the

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self-certification of income as long as it's verifiable, which means the applicant may need to verify the information they include on the form during a future audit or file review.

Sample language that has been used by HUD and other Grantees on Verifiable Self-certification forms is below:

Certification:

I/we certify that this information is complete and accurate. I/we agree to provide, upon request, documentation on all income sources to the HUD Grantee/Program Administrator.

As a matter of practice, the Grantee or Subrecipient should spot check the self-certifications and verify a sampling of them with supporting documents. They should also request verification documents if they find evidence to the contrary that an applicant is low-income. This information should be documented in applicant files and monitoring files.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

23. If a household receives one type of subsistence payment one month, say mortgage payment, and requests a broadband payment in the next month and then water/sewer payment the next month, is that okay or do all payments need to be for the same service?

This is determined by how the Grantee designed the program. Whether this is allowable or not should be detailed in the program policy guidelines. One requirement is for Grantees to ensure that CDBG-CV funds do not duplicate another resource provided for the same purpose and same time period. Proper documentation that shows this is a needed resource because of the COVID nexus will also need to be maintained.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

Public Facilities and Infrastructure

24. Is the installation of office space panels as part of a healthcare facility construction activity eligible for CDBG-CV funding?

Yes. Assuming this is not a permanent installation, this would be classified as equipment. Although the purchase of equipment is generally ineligible or limited within CDBG programs, under CDBG-CV, this **is eligible** under the Public Services eligible activity as it is equipment that helps the Grantee **prevent, prepare for, or respond to coronavirus**. Similarly, if this is a permanent installation it would be eligible as part of a rehabilitation activity under public facilities. Please note: the classification of this activity

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as movable equipment or as a construction activity will determine which federal cross-cutting compliance requirements apply to the project.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

Cross Cutting Elements and Compliance Documentation

25. Do all vendors (including, for example, a small local business selling limited quantities of goods) need to be registered in SAM?

Any entity receiving funds from a contract from the CDBG or CDBG-CV project must be registered in SAM, but this does not necessarily extend to those selling goods, it is largely applicable to professional services and construction services.

Applicability: CDBG & CDBG-CV Programs

26. For CDBG-CV funds, is the County the responsible entity and signatory for the National Environmental Policy Act (NEPA)?

The county is the responsible entity because they are the applicant to HCD. **Note:** This is not applicable to Tribal governments and subrecipients.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

27. Who should I direct National Environmental Policy Act (NEPA) questions to?

Your HCD Representative or CDBG@hcd.ca.gov. The CDBG Team will bring it further to an environmental specialist or other HCD resource if needed.

Applicability: CDBG-CV Program and FY 2019/2020 CDBG for coronavirus

28. How can we document that an individual received Federal Pandemic Unemployment Compensation (FPUC) but that it was temporary and is no longer applicable to their Adjusted Gross Income (AGI)?

NOTE: AGI methodology can ONLY be used for CDBG-CV Business Assistance. All other CDBG-CV programs that require income verification AND Annual CDBG MUST use Part 5 Income Verification methodology, except for CDBG used for Microenterprise Assistance to low-income microenterprise owners qualifying under LMCMC.

When using the AGI method, Grantees will follow the IRS instructions when accounting for FPUC. Per the IRS instructions for 2020:

- Up to \$10,200 of unemployment compensation paid in 2020 is excluded from income if your modified adjusted gross income is less than \$150,000.

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- The \$150,000 threshold applies to all filing statuses even if your filing status is married filing jointly.
 - If you are filing a joint return, up to \$10,200 of unemployment compensation paid to each spouse is excluded.
- HUD has issued guidance that if using the Part 5 methodology to calculate a household income, FPUC is not considered income.
- Grantees must select an income verification methodology and apply it consistently within their program. You cannot pick and choose which methodology you use, based on applicant circumstances.
- If an applicant's most recent tax return reflected higher unemployment benefits, but that situation has changed and they have stopped receiving those benefits, then the applicants should be providing current documentation that demonstrates their current household/family income.
- Microenterprises: If the owner doesn't qualify as LMI, you can look at the national objective for low- moderate-income area benefit, job retention or job creation.

Applicability: CDBG & CDBG-CV Programs

29. Do CDBG-CV quarterly reports need be done if implementation has not started?

Yes, you'll need to submit both financial and activity reports even if implementation has not started. If you don't have funds, you can do a zero-dollar financial report. In this report please also add what you have been working on, the anticipated date for your first draw, and what you anticipate being part of this first draw.

In the activity report, please provide narrative on what you are doing to get ready for implementation. For example, procurement, program design etc.

Management Memos on Financial Reports and Activity Reports are available here: <https://www.hcd.ca.gov/grants-funding/active-funding/cdbg.shtml#cdbg-memos>

Applicability: CDBG & CDBG-CV Programs