



## APPENDIX G

1

### Appendix G: Determining Service Area

Some CDBG-funded activities may be carried out to benefit an entire jurisdiction, or just a specific service area of the jurisdiction, including a combination of incorporated and unincorporated areas. The service area of a program or project activity will establish how the proposed Low/Mod-income beneficiaries are determined. Using a particular service area is often required to determine the eligibility of a CDBG activity when the National Objective is Low/Mod-income Area Benefit (LMA).

A service area must be identified with a readable map delineating the exact area being served. Each service area requires a separate set of tables and maps that includes all the appropriate data, to be submitted with the application. HUD provides a very useful tool, which combines mapping of Census Tract/Block Groups with LMI Area Data (FY'14) by Block Group, Census Designated Place, County Subdivision and County for use by CDBG applicants to assist with LMA benefit compliance determinations. This tool along with a [video tutorial can be found here](#). Census maps can also be obtained by visiting the United States Census Bureau website at [Data.census.gov](http://Data.census.gov).

For each activity, in the activity description indicate whether the proposed activity will be jurisdiction-wide or confined to a service area.

#### **SERVICE AREA(S)**

- A service area is a specific portion of a jurisdiction that will benefit from an activity.
- A service area may include incorporated and unincorporated areas (please see Jurisdictional Boundaries Guidance, below for limitation to this).
- Service areas must have at least 51 percent of its people or household documented as Low/Mod-income in order to meet Low/Mod-income area benefit national objective.
- Select the unit of census data that encompasses the proposed service area:
  - If the service area is completely within a Census Tract, identify the Census Tract.
  - If the service area is completely within a Census Tract's Block Group, identify the Block Group(s).
  - If the service area crosses boundary lines for more than one Census Block Group, identify all applicable Census Block Groups.

- To determine the percent of Low/Mod-income persons or households in a service area, either:
  - Use HUD’s ACS LMISD Map Application linked above.
  - Use HUD’s updated LMISD Excel files posted on HUD’s Low/Mod-income Summary Data page.

Use the tools referenced to locate the Census Tracts and Block Groups for your service area. Add up the total number of Low/Mod-income persons in the service area and divide by the total population in the service area to arrive at the service area Low/Mod-income percentage.

If an Income Survey was performed for the service area, indicate the results of the survey. Remember to submit all supporting documentation, including, but not limited to, the income survey, with the application. See the Guidance for Conducting Income Surveys in Appendix H for further information on income surveys.

Note: The Department reviews all activities for eligibility by determining that the activity will clearly meet one of the national objectives. An accurate service area determination is crucial to the determination of activity eligibility. If a service area does not clearly fit inside Census Tracts and Block Groups and the Census data shows a high proportion of non-Low/Mod-income beneficiaries residing within the Census area, the activity cannot be awarded funds without an income survey indicating the service area does meet the 51 percent Low/Mod-income requirement. It is incumbent upon the applicant, when preparing an application, to determine if an income survey is necessary to show that the activity will meet a National Objective.

## **JURISDICTION-WIDE**

- If a project or program is “jurisdiction-wide”, this means that every person or household in the jurisdiction has an opportunity to benefit from a CDBG-funded activity.
- When addressing a community-wide health and safety problem, benefit is generally provided to all the residents of a geographic area or all users of the public facility or service. Typically, only a portion of the beneficiaries of such an activity are Low/Mod-income persons or households.
- To determine the percent of Low/Mod-income for jurisdiction-wide activities, refer to the Low/Mod-income percentages noted in Appendix A or the results of a valid income survey.
- For those activities using population statistical data for scoring, the Department will use either the HUD Census data or the American Community Survey (ACS) data provided in Appendix A. (In 2010, the Census stopped tracking some

population characteristics, and charged the ACS with tabulating those characteristics.)

## JURISDICTIONAL BOUNDARIES GUIDANCE HUD'S

CDBG Final Rule changed and clarified the statute and regulatory rules for grantees implementing CDBG activities outside of their jurisdictional boundaries. These Final Rule changes became effective in May of 2012.

Activities conducted jurisdiction wide will still need to include appropriate census tract and block group information to make sure that the benefits are tracked correctly.

**Non-entitlement Cities:** The eligible area for a city is its incorporated boundaries. Cities applying for CDBG-funded activities that will be operated beyond the city limits will be required to show that the activity will predominantly benefit the residents within the city limits. This means activities that will benefit residents beyond a city's jurisdictional boundaries will require documentation demonstrating how the activity will significantly benefit the residents within the city, and that the benefit to residents outside the city limits, if applicable, will be insignificant.

**Non-entitlement Counties:** Residents of a county include those residents of the unincorporated area of the county as well as those residing within any incorporated city located within the county. Therefore, the county may implement CDBG activities beyond the unincorporated area of the county but may not fund or operate activities outside the county's boundaries (within another county's boundaries).