



Small food retailers in low-income neighborhoods often want to sell healthier, more affordable food, but many lack the resources necessary to do it. The Community Development Block Grant (CDBG) program is a flexible federal funding program that provides communities with resources to address a wide range of needs. Initiatives to support small store owners who wish to carry healthy foods may be eligible for CDBG funding. This fact sheet provides an overview of the CDBG program and discusses which healthy food retail activities might qualify for funding.

Community Development Block Grants Linking Health & Economic Development through Food Retail

Many communities are working with small food retailers to increase the quality and quantity of healthy, affordable food in low-income neighborhoods. These retailers often need many types of support, such as technical assistance or training, subsidies for renovations, materials for marketing and promotion, and more. Communities need to consider new funding sources to develop healthy food retail incentive programs and effectively support small food retailers.

The federal Community Development Block Grant (CDBG) program is one possible source of funding to support work with small food retailers in low-income communities.¹ The CDBG program provides flexible funding for communities to develop affordable housing and expand economic opportunities, principally for low- and moderate-income people. Many of the activities undertaken by healthy food retail programs are consistent with CDBG program guidelines and would therefore qualify for funding. This fact sheet provides an overview of the CDBG program, discusses which healthy food retail program activities might be eligible for funding, and offers suggestions on applying for funding.



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What is the Community Development Block Grant program?

In 1974, Congress established the Community Development Block Grant (CDBG) program to fund affordable housing, anti-poverty programs, and infrastructure development in low- and moderate-income communities.² There are three national objectives: to benefit low- and moderate-income people; to eliminate slums and blight; and to address urgent needs, such as disaster relief.

Every year, the CDBG program (administered by the U.S. Department of Housing and Urban Development, or HUD) provides grants to 1,200 cities and urban counties, as well as to states for distribution to smaller communities, local governments, and Indian tribes.^{3,4} HUD maintains a database of state and local CDBG awardees on its website.^{5,6} In 2015, Congress appropriated \$3 billion for CDBG.

CDBG is an entitlement program, which means that jurisdictions are awarded funds on the basis of need rather than through competition. HUD determines the funding level for each jurisdiction using a statutory formula that measures need as reflected by poverty level, age of housing stock, housing overcrowding, and population. The formula is intended to provide larger grants to areas with relatively high community development needs and smaller grants to places with less demonstrated need.

The CDBG program consists of two primary funding streams:

• Funding for large urban areas

Entitlement Communities, the largest CDBG program (70 percent of funding), allocates funds to cities with more than 50,000 people or urban counties with more than 200,000 people (about 1,100 cities and counties nationally).^{7,8}

• Funding for smaller communities

State-administered CDBG (previously known as “Small Cities”) awards funding to 49 states and Puerto Rico to distribute to smaller communities and rural areas (generally, cities with populations less than 50,000 and counties with populations less than 200,000).⁹

In Texas, Arizona, California, and New Mexico, 10 percent of state-administered CDBG funds are set aside for designated “colonias”—small communities lacking access to potable water, adequate sewage systems, and safe housing. This program is called the **Colonias Set-Aside**.

HUD directly administers the CDBG program for smaller communities and rural areas in Hawaii, where the program is called **HUD-administered Small Cities**.

In the U.S. territories of American Samoa, Guam, the Northern Mariana Islands, and the Virgin Islands, HUD provides CDBG grants through the **Insular Areas Program**.

Indian and Alaska Native Communities are funded through the **Indian CDBG Program**.



The State-administered CDBG program (which includes the Colonias Set-Aside) and the HUD-administered Small Cities program are also known as **Non-Entitlement Communities**. Both Entitlement Communities and Non-Entitlement Communities can transform a small portion of their CDBG funds into federally guaranteed loans for large-scale physical and economic revitalization projects. This program is known as the **Section 108 Loan Guarantee program**.

In addition to the funding for Entitlement and Non-Entitlement Communities, Congress occasionally authorizes additional CDBG funds. For example, during the foreclosure crisis that began in 2010, the **Neighborhood Stabilization Program** assisted neighborhoods hardest hit by foreclosures. **Disaster Recovery Assistance** provides funding to Presidentially declared disaster areas.¹⁰

CDBG funds may be used for housing, public improvements, public services, and economic development activities. Housing activities may include housing rehabilitation and renovation, limited home ownership assistance, and construction of new housing (if construction is completed by special neighborhood-based nonprofits).

CDBG funds may also pay for improvements to public infrastructure and facilities, such as streets, curbs, water systems, sewage systems, parks, and playgrounds. Additionally, funds can subsidize the demolition of vacant buildings. Jurisdictions can also spend CDBG funds on plans, studies, and a range of public services, such as employment services, substance abuse services, and services for the homeless.



Finally, CDBG funds can be used for economic development activities, including the acquisition and rehabilitation of commercial or industrial buildings and support for small businesses.¹¹

State and local governments are charged with distributing the funding to eligible local entities, including departments within the governmental entity itself, other government agencies, community-based organizations, and contractors. Governments have substantial flexibility in implementing CDBG, provided the funds are used for eligible activities that meet national objectives set by the federal government. Practically, this means there is considerable local variation in the specifics of how the program is implemented. This fact sheet describes HUD's general guidance for the Entitlement Communities and State-administered CDBG programs. For specific information on how a particular program operates locally, advocates should speak to their local jurisdiction.¹² For information about other CDBG funding programs, contact your local HUD office.¹³

How the CDBG funding process works

To receive CDBG funding, a jurisdiction (a city, an urban county, or a state) must develop and submit to HUD a **consolidated plan** every three to five years. The consolidated plan (also known as the "ConPlan") is a comprehensive planning document that analyzes the jurisdiction's housing needs and current housing stock, establishes priority housing needs, and describes how the jurisdiction will allocate funding to address housing and community development needs. The jurisdiction chooses an agency to develop the consolidated plan and administer

the CDBG program. Depending on the jurisdiction, the program may be administered by the housing and community development department, the economic development agency, the planning department, the mayor's office, or another agency. Once the jurisdiction submits its consolidated plan, HUD reviews it to make sure it is consistent with the program goals.¹⁴

Every year, the jurisdiction must also submit an **action plan** that specifies what activities the jurisdiction will undertake to address the priority needs and objectives itemized in the consolidated plan. In developing the action plan, the jurisdiction must decide how much money to allocate to each activity and identify who will undertake the activity. Thus, in developing the action plan, the jurisdiction is deciding what and who to fund with CDBG funding.

The jurisdiction can allocate funding to itself, a governmental agency separate from the jurisdiction (such as a housing authority), nonprofit organizations, or for-profit contractors.¹⁵ The HUD regulations do not require that a jurisdiction use a particular process to select its subrecipients. Jurisdictions are not required to use a competitive process, although many do.¹⁶ Jurisdictions vary in the extent to which they rely on other entities to carry out CDBG activities. Some jurisdictions award as much as half of their funding to subrecipient agencies; others tend to perform most of the functions themselves.¹⁷ Both the jurisdiction and the chosen subrecipients must keep extensive records demonstrating their performance and compliance with the program.¹⁸

Which healthy food retail program activities are eligible for CDBG funding?

CDBG funds may be used to finance eligible economic development projects, including microenterprise and small business development. Many strategies of healthy food retail programs are consistent with CDBG funding guidelines for economic development projects. This next section gives an overview of the CDBG funding guidelines and discusses which healthy food retail program activities may be eligible for funding.

In order to determine whether a particular activity is eligible for funding, the jurisdiction must first identify whether the activity falls within a category of explicitly authorized activities in the CDBG statute. Next, an applicant must demonstrate that the activity meets one of the three CDBG national objectives.¹⁹

STEP 1: Determine whether the healthy food retail activity is an eligible CDBG activity

Healthy food retail program activities will likely be eligible for CDBG funding under one of three categories: rehabilitation, special economic development, or microenterprise assistance. All three of these categories allow CDBG funds to be used to support private businesses serving low- and moderate-income persons.

- **Rehabilitation activities:** CDBG funds may be used to rehabilitate the exterior of commercial buildings (for example, through commercial façade improvement programs) and correct code violations.²⁰ In many jurisdictions, CDBG funds are used to pay for commercial façade improvements.
- **Special economic development activities:** This category specifically refers to acquisition, construction, or rehabilitation of commercial or industrial property; financial and technical assistance to for-profit private entities; and general economic development services, such as outreach, screening, and reviewing applications.²¹
- **Microenterprise assistance activities:** This category refers to economic development activities that help establish, stabilize, and expand small businesses with five or fewer employees, one of whom must be an owner. This category authorizes the use of funds for financial assistance, technical assistance, and general support to microenterprises.²²

STEP 2: Determine whether the healthy food retail activity meets a national objective

In order to qualify for CDBG funding, the healthy food retail activity must also meet one of three national objectives:

1. Benefit persons of low- or moderate-income;
2. Prevent or eliminate slums or blight; or
3. Meet an urgent community development need because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available.

Healthy food retail program activities would likely meet the first national objective: benefit persons of low- or moderate-income. To demonstrate a particular activity meets the first national objective, it must comply with one of four subcategories:

1. It must be based on an “area benefit”;
2. It must serve a “limited clientele”;
3. It must involve housing; or
4. It must involve jobs.

The first two subcategories are most relevant to healthy food retail programs. Healthy food retail programs working with larger stores or with owners who don’t meet the income thresholds could meet the “area benefit” test if the store is located in a neighborhood where at least 51 percent of residents are low- or moderate-income.²³ Healthy food retail programs working with stores with fewer than five employees, one of whom is the owner, would qualify for the “limited clientele” subcategory if the store owner’s annual income meets the low- or moderate-income threshold.

Most healthy food retail programs working with small stores will not meet the CDBG guidelines for job creation or retention (subcategory four listed above). Programs working with supermarkets can learn more about the specific job creation requirements at the HUD website.²⁴



Healthy food retail program activities

The following is a list of common healthy food retail program activities that may be eligible for CDBG funding:

- **Façade improvements**

Healthy food retail advocates may wish to assist store owners with upgrades to the exterior of the store. These upgrades could include fresh paint, new awnings, the removal of bars, and/or the installation of new security systems.²⁵ Support for façade improvements could take the form of grants, loans, and/or technical assistance.²⁶

- **Financial incentives such as loans and grants**

Small food retailers may need financial support to expand their business to include more healthy choices. CDBG funds may be used as grants and loans to develop or expand a business.²⁷

- **Technical assistance**

CDBG funding may be used to provide food retailers with technical assistance, advice, and business support services.²⁸ Small food retailers who wish to upgrade the quality and quantity of healthy foods may benefit from various kinds of technical assistance, including information on stocking and merchandising fresh produce, assistance with business planning, market analysis, and/or accounting. CDBG funds may be used to help retailers develop marketing strategies, train staff, and build financial projections.

- **Retailer outreach**

Finding the right retailers to make healthy changes can be time-consuming and labor-intensive, but it is key to the sustainability and impact of healthy food retail initiatives. CDBG funds could fund retailer outreach.²⁹

- **Production and distribution of marketing materials**

CDBG funds can be used to pay for the production and distribution of marketing materials to promote a business participating in a healthy food retail program.³⁰

- **Interior renovations**

Many healthy food retail incentive programs include support for interior renovations, such as new or upgraded refrigeration, shelving, and lighting. Under the special economic development category, CDBG funding may be used to purchase equipment, fixtures, and furnishings.³¹ If a retailer has been cited for code violations, CDBG funds may be used to correct those violations.³²



How to apply for CDBG funding

The next section discusses how healthy food retail advocates can identify stakeholders, get involved in the planning process, and partner with local organizations to put together a successful proposal for CDBG funding. The first step is to figure out whether the jurisdiction already receives CDBG funds. HUD maintains on its website a database of CDBG state, city, and county awardees and their contact information.³³ Because there is considerable variability in how a CDBG program is implemented locally, healthy food retail advocates should contact the lead agency administering the CDBG program to understand the local CDBG funding timeline.

There are two stages in the CDBG funding process: (1) development of the consolidated plan and (2) development of the annual action plan. As described on page 3, the consolidated plan is a high-level overview of CDBG priority areas, submitted every three to five years. The annual action plan specifies how much money will be allocated to each activity and who will undertake it. Both the consolidated plan and the annual action plan have several requirements for public participation. As such, these stages provide many opportunities for healthy food retail advocates to partner with local stakeholders and other organizations.



Consolidated plan process

Jurisdictions are required to develop a citizen participation plan to gather input for the development of the consolidated plan, any substantial amendment to the consolidated plan, and the performance (evaluation) report.³⁴ In the process of developing and implementing the consolidated plan, the jurisdiction must encourage the participation of local and regional institutions, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations, and public housing agencies.³⁵ The jurisdiction must also provide for and encourage participation by low- and moderate-income people at all stages of the process.

The jurisdiction must share information about the amount of funding it expects to receive and the activities that may be undertaken.³⁶ The participation plan must also provide information on how the consolidated plan will be made available to the public. Before a proposed consolidated plan or action plan is published for comment, there must be at least one hearing to obtain public input regarding needs and priorities. In addition, local jurisdictions must hold at least one more hearing to obtain public comments about proposed priorities and activities. Jurisdictions must accept written and oral comments on the plan, summarize their response to community members' comments, and attach the summary to the final consolidated plan/annual action plan.³⁷ Healthy food retail advocates and their community partners should attend hearings and provide information on the need for healthy food retail and small business support.

In addition to holding public hearings, the lead agency is required to consult with public and private agencies when developing the consolidated plan and the annual plan (see next section). Public health department staff and nonprofit organizations with an interest in healthy food retail can meet with the lead agency during this time to discuss the food access needs of the jurisdiction's low- and moderate-income neighborhoods.

Although participating in the consolidated plan process will not guarantee funding for a particular project, healthy food retail advocates can use it as an opportunity to educate elected officials, local government staff, and other stakeholders on the relationship between food access and the health of low-income people. There are no statutory requirements that the consolidated plans address food retail, so advocates will need to make the case for the connections between food access, health, and community development. Healthy food retail advocates should build partnerships with local organizations with a common interest in economic revitalization, microenterprise development, and community engagement. Advocates can use the consolidated plan process to lay the foundation for future partnerships and funding opportunities.

Annual action plan process

Jurisdictions must submit to HUD an annual action plan that specifies what activities will be funded during the coming year. The jurisdiction is required to solicit public input during the action plan development process. Local jurisdictions must offer at least two public hearings each year to receive input on housing and community development needs, the development of proposed activities, and program performance.³⁸ States, on the other hand, need to have only one hearing about housing and community development needs.

In addition, state and local jurisdictions are required to consult with the relevant public agencies working on local community development issues (these may include departments that address housing and community development, economic development, planning, and public health). The jurisdiction uses this input to make decisions about how and to whom CDBG funds will be dispersed. Jurisdictions use different methods to prioritize projects and allocate funding. Some use a formal, competitive

process; others renew current subrecipients or directly solicit qualified local organizations. Jurisdictions are required to provide technical assistance in proposal development to groups that represent persons of low- and moderate-income.³⁹

CDBG funding processes are often highly political, and influenced by local fiscal policy and elected leaders' priorities. The types of organizations receiving subrecipient funding vary by community, but may include community development corporations, community development financial institutions, nonprofit housing developers, nonprofit services providers, and/or nonprofit organizations specializing in business development services.

Healthy food retail advocates should contact the local lead agency to understand how the process works locally. Advocates should review current and past CDBG awardees to identify potential partners. They should also contact the local lead agency for a copy of the current annual action plan, which lists current awardees, as well as a copy of the CDBG Grantee Performance Report, which contains a list of past awardees. The cadre of organizations receiving CDBG funding may be fairly well established such that a new applicant may be treated as a competitor for limited funds. In addition, recent cuts to CDBG allocations may mean more competition for funding.

Partnering with organizations or government agencies currently receiving CDBG funding can be a good way for healthy food retail advocates to develop initial proposals for funding. In particular, advocates should reach out to community development corporations (CDCs), microenterprise lenders, and economic development agencies or organizations to discuss partnership opportunities:

- **CDCs** are community-based organizations that serve low-income neighborhoods through a variety of activities, including affordable housing development, community organizing, economic development, and other social services. Some CDCs work closely with small businesses as a part of an overall community revitalization strategy, and may be natural allies in healthy food retail work.
- **Microenterprise lenders** offer small loans (ranging from a few hundred to several thousand dollars) and favorable repayment terms. Many jurisdictions partner with microenterprise lenders to meet the capital needs of small businesses, which may be important for food retailers seeking to purchase new equipment or make significant repairs.
- Local **economic development agencies** or private economic development organizations provide valuable technical assistance to small businesses, including assistance with market analysis, marketing, and accounting. Food retailers can often benefit from these services.





Tips for Success

- ✓ **Identify shared goals**

Advocates should highlight how working with small food retailers generates economic benefits for the target area and strengthens neighborhood revitalization.⁴⁰ To make a proposal more competitive, advocates should stress how working with small food retailers (and other purveyors of healthy food) can contribute to neighborhood revitalization, meet the needs of low- and moderate-income people, and bolster small businesses.

- ✓ **Reach out to local or state government staff and elected officials**

Because the government's current CDBG funding portfolio may not include healthy food retail activities, advocates should take the time to meet with the staff and elected officials charged with administering the CDBG program. Advocates should share information about the importance of healthy food access to health and economic development. Local government staff and elected officials may be particularly interested in job creation and other measures of economic impact. A champion in local government can make a world of difference in getting a program funded.

- ✓ **Get involved in the consolidation plan process**

Advocates should use the consolidated plan's public participation process to educate staff, elected leaders, community-based organizations, and the media about the need for healthy food retail and the contribution of small food retailers to an overall neighborhood revitalization strategy.

- ✓ **Apply for funds in the action plan process**

Advocates should develop funding proposals during the annual action plan process. Proposals that show a clear link between healthy food retail and neighborhood revitalization are the most likely to be awarded funding.

Case Studies of CDBG funding

To date, only a handful of communities have used CDBG funds to support work with small food retailers. The following case studies describe healthy food retail activities that have been funded.

Columbus, OH

Awardee: Fresh Foods Here, a project of the United Way of Central Ohio

CDBG Eligible Activity: Special economic development
Years funded: 2012 and 2013

Funding: \$25,000 (2012); \$40,000 (2013)

Fresh Foods Here, a collaborative of ten partners from community-based, government, and academic organizations, works to improve the offerings of small food retailers in the Columbus, Ohio area. Fresh Foods Here received a \$25,000 CDBG award in 2012 and \$40,000 in 2013. Fresh Foods Here used CDBG funds to hire a program manager, coordinate façade improvements among participating stores, promote participating stores in local media, and develop social marketing collateral materials (brochures, palm cards, and yard signs). Fresh Foods Here was able to attract CDBG funding thanks to strong relationships with local elected officials and planning staff who were willing to think outside the box.^{41,42}



Los Angeles, CA

Awardee: LA Food Policy Council, a project of Community Partners

CDBG Eligible Activity: Microenterprise
Year funded: 2013

Funding: \$70,000

The Los Angeles Food Policy Council, a project of Community Partners, was awarded \$70,000 in CDBG funds in 2013. These funds will support corner store rehabilitation activities, including new equipment purchases (refrigeration, shelves, and signage), renovation, business assistance, and produce marketing training. Clare Fox of the Los Angeles Food Policy Council said that using CDBG funding for corner store work “meant emphasizing community economic development priorities in addition to our community health goals.” For healthy food retail programs already funded primarily by public health funders, reframing the message requires new vocabulary, new metrics for evaluation, and new partners.^{43,44}

St. Louis, MO

Awardee: St. Louis Development Corporation

CDBG Eligible Activity: Rehabilitation

Years funded: 2011-present

Funding: variable

The Community Development Agency of the City of St. Louis awarded CDBG funds to the St. Louis Development Corporation, which partnered with the St. Louis Healthy Corner Store Project to offer selected corner stores façade improvements. The façade improvement program gives the stores a much needed facelift. Staff at the St. Louis Development Corporation also asked the city to make sidewalk improvements and install a bike rack in front of each store. Michelle Petersen of the St. Louis Development Corporation stressed that “improvements have to be informed by community dialogue about what prevents them from coming to the store.” The St. Louis Development Corporation has also experimented with offering loans for equipment purchases, but has found that few store owners are ready to take on debt. Now, store owners are referred to the Missouri Small Business Development Center for training and technical assistance, and also to the microlending program at Justine Petersen, a local community development finance institution. Even though St. Louis does not have a specific set aside for working with food retailers, neighborhood grocery stores have highest priority in the façade improvement program.^{45,46}

Overview of CDBG-eligible healthy food retail program activities

This chart provides an overview of how healthy food retail program activities fit into CDBG program guidelines. For each activity, the chart identifies the corresponding CDBG eligible activity, the appropriate national objective, and whether the public benefit test is required.

Food Retailer Activity	CDBG Eligible Activity	National Objective
<p>Façade improvements</p> <p>If the store owner has not complied with the local building code, CDBG funds can be used to correct any violations.</p>	Rehabilitation ⁴⁷	<p>Low- or Moderate-Income (Area Benefit)</p> <p>Retail store is located in qualifying low- or moderate-income area that is primarily residential.</p>
<p>Grants, loans, technical assistance, and outreach to food retailers that are microenterprises (five or fewer employees, one of whom is the owner).</p>	Microenterprise assistance ⁴⁸	<p>Low- or Moderate-Income (Limited Income)</p> <p>The microenterprise assistance is provided to a low- or moderate-income person who owns or is developing a microenterprise; or</p> <p>Low- or Moderate-Income (Jobs)</p> <p>The food retail business will create or retain jobs, 51 percent or more of which will benefit low- or moderate-income persons.</p>
<p>Grants, loans, technical assistance, and other support to develop or expand business, incl. developing marketing strategies, training staff, and developing financial projections.⁴⁹</p> <p>Purchase equipment, fixtures, and furnishings.⁵⁰</p> <p>Outreach efforts to implement a healthy retail program, including:</p> <ul style="list-style-type: none"> • identify food retailers; • market available forms of assistance; • screen applicants; • review applications for technical or financial assistance; • prepare agreements with store owners; and • manage program activities.⁵¹ 	Special economic development activities ⁵²	<p>Low- or Moderate-Income (Area Benefit)</p> <p>Retail store is located in qualifying low- or moderate-income area that is primarily residential.</p>

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- 23 For the purpose of CDBG funding, a low-and moderate-income person is defined as "a member of a family having an income equal to or less than the Section 8 Housing Assistance Payments Program low-income limits established by HUD applicable to the size of the person's family." U.S. Department of Housing and Urban Development. "Meeting a National Objective." Accessed on June 19, 2014. Available at http://portal.hud.gov/hudportal/documents/buddoc?id=DOC_17134.pdf.
- 24 U.S. Department of Housing and Urban Development. "Meeting a National Objective." Accessed on June 19, 2014. Available at http://portal.hud.gov/hudportal/documents/buddoc?id=DOC_17134.pdf. (p.24)
- 25 Advocates should note that construction work using CDBG funds in excess of \$2000 may be subject to Davis Bacon prevailing wage requirements. Applicants should speak to the local lead agency to determine how to comply with these requirements. To learn more, see www.hud.gov/offices/adm/budclips/guidebooks/HUD-LR-4812/4812-LR.pdf. To learn more, see: HUD. *Making Davis-Bacon Work: A Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Project*. June 2006. Available at: www.hud.gov/offices/adm/budclips/guidebooks/HUD-LR-4812/4812-LR.pdf.
- 26 Façade improvements are eligible under the Building Exterior Improvement activity. 24 C.F.R. § 570.202(a)(3) (2014).
- 27 Financial incentives to retailers are eligible under both the 24 C.F.R. § 570.203 (2014) (Special Economic Development, 24 C.F.R. § 570.203, and the Microenterprise Assistance, 24 Activities) and 24 C.F.R. § 570.201(o) (2014), depending on the number of store employees and whether the owner is an employee of the store.
- 28 Technical assistance to retailers are eligible under both the 24 C.F.R. § 570.203 (2014) (Special Economic Development, 24 C.F.R. § 570.203, Activities) and the Microenterprise Assistance, 24 C.F.R. § 570.201(o) (2014), depending on the number of store employees.
- 29 Outreach to retailers is eligible under both the 24 C.F.R. § 570.203 (Special Economic Development, 24 C.F.R. § 570.203, Activities) and the Microenterprise Assistance, 24 C.F.R. § 570.201(o) (2014), depending on the number of store employees.
- 30 The production of marketing materials to promote a business is eligible under both the 24 C.F.R. § 570.203 (2014) (Special Economic Development, 24 C.F.R. § 570.203, Activities) and the Microenterprise Assistance, 24 C.F.R. § 570.201(o) (2014), depending on the number of store employees.
- 31 http://portal.hud.gov/hudportal/documents/buddoc?id=DOC_17133.pdf. (p.56) HUD, *supra* note 22.
- 32 http://portal.hud.gov/hudportal/documents/buddoc?id=DOC_17133.pdf. (p.38) HUD, *supra* note 21.
- 33 http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/contacts. HUD, Office of Community Planning and Development. "CDBG Contacts". Accessed on June 11, 2014. Available at: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs/contacts.
- 34 42 U.S.C. § 5304(a)(2) (2006); 24 C.F.R. § 91.105(a) (2014).
- 35 *Id.* 42 U.S.C. § 5304(a)(3) (2006); 24 C.F.R. § 91.105(a) (2014).
- 36 24 C.F.R. § 91.105(b) (2014).
- 37 *Id.*
- 38 24 C.F.R. § 91.105(c) (2014).
- 39 24 C.F.R. § 91.105(i) (2014).
- 40 For more information about how food retail generates economic benefits for low-income areas, see: Hagan E and Rubin V. *Economic and Community Development Outcomes of Healthy Food Retail*. Oakland, CA: PolicyLink (no date). Available at: www.rwjf.org/content/dam/farm/reports/reports/2013/rwjf406490.
- 41 Personal communication, Dave Ciccone, United Way of Central Ohio, Jill Clark, Ohio State University, and Caitlyn Marquis, Fresh Foods Here. October 11, 2013.
- 42 For more information about Fresh Foods Here, see *A Healthy Corner Store Initiative: Summary – Report*. November 2012. Available at: http://live.untedcentralohio.org/download/initiatives/fresh_foods_here/FFH-Summary-Report.pdf.
- 43 Personal communication, Clare Fox, Los Angeles Food Policy Council. May 1, 2014.
- 44 For more information on the Los Angeles Policy Council's work with small food retailers, see <http://goodfoodla.org/policymaking/healthy-neighborhood-market-network/>.
- 45 Personal communication. Michelle Petersen, St. Louis Development Corporation. May 16, 2014.
- 46 For more information about the St. Louis Healthy Corner Store Project, see <http://extension.missouri.edu/stlouis/healthycornerstore.aspx>.
- 47 24 C.F.R. § 570.202(a)(3)
- 48 24 C.F.R. § 570.201(o)
- 49 24 C.F.R. § 570.203(b)
- 50 http://portal.hud.gov/hudportal/documents/buddoc?id=DOC_17133.pdf. (p.56)
- 51 24 C.F.R. § 570.203(c).
- 52 24 C.F.R. § 570.203