

CDBG SMALL CITIES
POLICY BULLETIN 2024-01



DATE: December 31, 2024
TO: CDBG Grantees and Interested Parties
FROM: Andrew Hayman, CDBG Director
RE: Senior Center Neighborhood Facilities

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CDBG funds may be used to construct or rehabilitate a senior center as an eligible public facility under 24 CFR 570.201(c). Senior centers are considered "neighborhood facilities" that primarily serve the community's elderly population, particularly those from low- to moderate-income households.

Primary Use

The purpose of this Bulletin is to clarify that CDBG funds may be used to construct or rehabilitate a senior center as an eligible public facility under 24 CFR 570.201(c). Senior centers are considered "neighborhood facilities" that primarily serve the community's elderly population, particularly those from low- to moderate-income households.

Secondary Use

Senior centers may be rented for special events or other activities outside their primary purpose, such as on weekends, provided:

1. The primary function of the facility as a senior center remains intact and in compliance with CDBG regulations.
2. The rental of the facility does not interfere with its operation as a senior center.

Program Income from Rentals

Any income generated from renting the facility must be considered program income under 24 CFR 570.504(b). This income must be used for:

1. Eligible CDBG activities, including the maintenance, operation, or improvement of the senior center.
2. Other allowable community development purposes under the CDBG program.

Compliance

CDBG recipients are responsible for ensuring that any additional use of the facility, such as renting for events, does not undermine its primary purpose of serving seniors. Moreover, recipients must track and report all income generated from such rentals, ensuring it is reinvested into eligible CDBG activities.