Community Development Block Grant Economic Development Program

Application Guidelines

2026

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Grant Application Guidelines for the Community Development Block Grant Economic Development Program

Introduction

The Community Development Block Grant Program is a U.S. Department of Housing and Urban Development program designed to help communities provide decent housing, a suitable living environment, and expand economic opportunities for the state's low- and moderate-income residents. The State of Montana receives an annual allocation of federal funds from HUD for CDBG grants and program administration through the Montana Department of Commerce. These CDBG Economic Development application guidelines establish the process for obtaining CDBG assistance for job creation, retention, and training activities. Separate application guidelines for CDBG planning, affordable housing development and preservation, public and community facilities, and housing stabilization can be found on Commerce's website at: commerce.mt.gov/Infrastructure-Planning/Programs-and-Services/Community-Development-Block-Grant/.

Eligible Applicants

Eligible applicants for CDBG assistance include Montana cities, towns, and counties. The cities of Billings, Great Falls, Missoula and Bozeman, entitlement communities, are not eligible for state CDBG funds as they receive a separate CDBG allocation directly from HUD. State CDBG funds may be used to fund an activity located within the boundaries of an entitlement community if the project primarily benefits residents of a larger area or region beyond the jurisdictional limits of the entitlement community. The entitlement community must also supply a "meaningful contribution" towards the proposed project. For more information, contact Community MT staff. Tribal governments are not eligible applicants for state CDBG funds but are eligible for Indian CDBG funds directly from HUD. Local governments may also apply for and use CDBG funds for project activities predominantly benefitting residents of Indian reservations.

Local governments may directly undertake eligible economic development activities, or local governments may apply on behalf of a business or organization – known as the subrecipient – undertaking the activity. Subrecipients may include but are not limited to:

- For-profit entities
- Non-profit entities
- Certified Regional Development Corporations

- Economic Development Organizations

Additional Considerations

Applications for new projects are accepted on a semi-annual basis subject to available funding. The maximum funding amount is $525,000 per local government in a program year.

Eligible applicants are limited to local governments, but Commerce encourages local governments to work with partner organizations, as listed above, to complete CDBG-ED projects. The local government, in accordance with applicable procurement requirements, will decide the nature and extent of partner organizations' involvement in CDBG-assisted projects; project roles and responsibilities will be established in the project management plan.

Each eligible local government jurisdiction may apply once per application cycle for each of the categories of CDBG grants if the applicant does not have an open CDBG project in the same category. The categories of CDBG grants are 1. Community Facilities, 2. Public Facilities, 3. Affordable Housing Development and Rehabilitation, 4. Economic Development, and 5. Planning. In limited circumstances, and with Commerce approval, Commerce may allow a local government to have more than one CDBG Public Facility, Community Facility, or Housing application open. If an applicant has an open CDBG project in a CDBG project category that prior to the CDBG application date has not been issued documentation of substantial completion, a new project application in that same category will need to be approved by Commerce. For more information, contact Community MT. A second application in the same category as the open project will be deemed ineligible without prior authorization from Community MT staff.

Anti-Pirating

CDBG-ED funds cannot be used to directly assist a business to relocate a business from one Montana labor market area to another. The purpose of the CDBG-ED program is to create and/or retain jobs, but not if assistance will result in other jobs being lost in a community or region. Under federal anti-pirating statutes, CDBG-ED funds cannot be used to assist directly in the relocation of any industrial or commercial plant, facility, or operation, from one area to another, if the relocation is likely to result in a significant loss of employment in the labor market area from which the relocation occurs. More information can be found at 24 CFR Part 570.482(h) and here: files.hudexchange.info/resources/documents/CDBG-Memorandum-Job-Pirating-Activities.pdf.

Conflict of Interest

Recipients must comply with the conflict of interest provisions in 24 CFR Part 570.489(h). Any potential or actual conflict of interest must be disclosed to Commerce to coordinate efforts to inform the public and to ensure proper steps are taken to address the conflict.

Grant or Loan

CDBG-ED awards are granted to the local government which then can provide either a low-interest loan or a grant to the subrecipient. In the case of a loan, the interest rate is not calculated or set by Commerce. Applicants are encouraged to work with their local CRDC on establishing the interest rate and, when applicable, having the CRDC administer the loan.

Eligible Projects

The CDBG-ED program requires projects to meet HUD's national objective to benefit LMI persons. As a result, CDBG-ED funding may be used for job creation, retention or training in Montana where at least 51% of the applicable jobs at the recipient business are held by or available to LMI persons. A job is determined to be LMI based on the HUD income limits for that county.

Documenting LMI Benefit

CDBG-ED projects may qualify based on "LMI Job Creation or Retention," meaning they demonstrate that at least 51% of the jobs (computed on a full-time equivalent basis) will be made available to or held by LMI persons.

Eligible Activities

CDBG ED funds can pay for construction, working capital, equipment purchases or administration related to employee training for the purpose of job creation or retention. The maximum grant award will not exceed $35,000 per job created or retained, or $5,000 per job trained, up to $525,000. Although a CDBG-ED award can result in the creation of a revolving loan fund, simply the creation of a revolving loan fund is not an eligible activity. Eligible projects will focus on:

- Job Creation
  - For projects involving the creation of jobs, the jobs should be held by or available to LMI persons.
    - Jobs are considered available to LMI persons when: 1) there is not a prerequisite for special skills that can only be acquired with substantial training, work experience, or education beyond high school, or the subrecipient agrees to hire persons and provide training; 2) the subrecipient takes actions to ensure that LMI persons receive first consideration for filling these jobs; and 3) the proposed wages or salaries meet the HUD income limits for the designated community
- Job Retention
  - Income levels should be documented using a household's prior year income. The verification forms should be completed no more than 30 days prior to submittal of the application.

    - The application must provide clear and objective evidence that, without CDBG-ED assistance, the jobs would be lost.
- Job Training
    - Jobs should be created for or retained by LMI persons.

In addition, up to 10% of the total CDBG budget for the project can be used for direct grant administration expenses.

Eligible Activities

CDBG-ED funds can only be used for activities specifically listed in 24 CFR Part 570.482. Please contact Community MT staff to ensure that an activity is eligible for CDBG-ED funding.
Expenses that directly relate to construction activities that implement the scope of work identified in the CDBG grant contract, including materials, labor, land acquisition, and permanent furnishings, equipment, and fixtures. Montana Department of Commerce 13 • Professional services that directly relate to design activities that implement the scope of work identified in the CDBG grant contract. • Repayment of interim financing directly related to project activities that implement the scope of work identified in the CDBG grant contract. • Special assessments, connection charges, and hook-up fees for LMI residents. • Legal costs and fees, including bond counsel. • Direct grant administration expenses, up to a maximum 10% of the total CDBG budget for the project.

Ineligible Expenses

CDBG-ED funds cannot be used for the following:

- Any costs incurred prior to the award letter date;
- Per 24 CFR Part 570.207(a)
    - Buildings for the general conduct of government
    - General government expenses
    - Financing for political activities or engaging in other partisan political activities

Expenses that are not eligible for CDBG funding include, but are not limited to: • Operation and maintenance costs. • Temporary furnishings, fixtures, or equipment. • Any unauthorized costs incurred prior to the date identified in the notice of award letter.

- Potentially other activities not specifically listed in 24 CFR Part 570.482 .

Additional Considerations

Applicants must comply with all applicable parts of the Housing and Community Development Act of 1974, as amended, 42 U.S.C. Part 5301, et seq.; applicable HUD regulations, all administrative directives and procedures established by Commerce including the most recent version of the CDBG Grant Administration Manual; and all other applicable local, state, and federal laws, regulations, administrative directives, procedures, ordinances or resolutions.

CDBG-ED Underwriting Criteria

CDBG-ED funds are public investments and carry with them unique requirements and expectations that constitute a public value. HUD regulations outline basic project underwriting guidelines to assure that state programs administering federal CDBG funds uphold the federal CDBG objectives. Montana CDBG-ED funds must meet HUD minimum standards for investments, as stated in HUD 24 CFR Part 570.482. HUD Minimum Standards for Investments

1. Project costs are reasonable
2. All sources of project financing are committed
3. CDBG funds are not substituted for non-federal financial support
4. Financial feasibility of the project
5. Reasonable Return on Owner's Equity
6. CDBG funds are disbursed on a pro rata basis with other finances provided to the project

1. Project Costs are Reasonable

Review of project budget to ensure that it is realistic, does not over-inflate expenses or fees, utilizes funds efficiently and is financially comparable to other projects and industry standards.

2. All Sources of Financing are Committed

All other sources of project financing are committed and documentation submitted for verification. Commerce will review the status of other funding sources to ensure the applicant can successfully complete the project within a reasonable timeframe.

3. CDBG Funds are not Substituted for non-Federal Financial Support

Need for public investment due to limited owner personal equity and a bank or financing institution has reached their lending limit on the project or will not fund the project. Analysis will vary based on the nature and complexity of the project, as financing for for-profit businesses have a higher degree of expectation of appropriate levels of private investment.

4. Financial Feasibility of the Project

The owner's financial viability will be evaluated with a review of their business model, financial statements, debt capacity and future earnings projections. The project should be viable with CDBG investment and result in a public benefit of creation and retention of LMI jobs. The project should achieve a level of operation that is successful in the short- and long-term and should provide sufficient cash flow to repay debt, repay public investment, meet the community development objectives or fulfill feasibility for at least the terms of the loan.

5. Reasonable Return on Owner's Equity

Owner return on the project should be reasonable given both the equity invested and the risk taken and should be compared to similar projects within the region. Repayment terms should be consistent with the use of the funds and based on the financial structure of the project. The potential of a low-interest-bearing loans for for-profit businesses require analyzing and judging the merits of individual projects.

6. CDBG Funds are Disbursed on a Pro Rata Basis with Other Finances Provided to the Project

CDBG funds cannot be the first funds invested into a project. They should be disbursed in proportion to the percentage of the project they fund or to other project funding sources. They cannot be released as a lump sum.

Underwriting Standards

If granted funds will be dispersed as a loan to the subrecipient for profit entity, Commerce will consider the following during application review:

- overall creditworthiness of prospective borrower through review of company and personal financial statements.
- historical trends, financial statements, cash flow projections, management performance, market and industry conditions, capital structure, and collateral analysis.
- reports including credit, appraisal, and business plan.
- Level of equity invested in business and capacity of business income in relation to debt.

Match

Local governments or subrecipients must contribute funds equal to at least 1:1 of the total project cost unless a waiver request is approved. For profit subrecipients must contribute matching funds equal to at least 1:1 of the total CDBG-ED funds requested unless a waiver request is approved. Non-profit applicants must contribute matching funds equal to at least 1:3 of the total CDBG-ED funds requested unless a waiver request is approved. Sources of eligible matching funds may include:

- Bank loans or other cash
- Loan or grant funds from a state or federal program
- Funds expended for project-related expenses directly related to the proposed project during the period 18 months prior to the CDBG-ED application submittal
- Land or materials provided by the applicant to the project, if appraised by a licensed appraiser within a two-year period preceding the application submittal. Land or materials that cannot accurately and fairly be assigned a uniform monetary value are ineligible as matching funds.

Match Waiver

In cases of extreme financial hardship or where the public's health or safety is affected, applicants may request a waiver for the match requirement. The applicant must document that due to financial hardship, without additional grant assistance, the financial burden would be unreasonable.

To request a match waiver, the applicant must submit a letter, on official letterhead, with their application and address the three CDBG waiver conditions:

1. A serious deficiency exists and adverse consequences clearly attributable to the deficiency have occurred or are likely to occur.
2. The financial analysis clearly indicates that higher local financial participation is not feasible or appropriate.
3. Other sources of funding are not reasonably available.

Public Notice and Participation

To receive CDBG funds, both Commerce and applicants must carry out citizen participation in a manner that complies with the2025-2029 Montana Consolidated Plan. For a proposed project to be eligible for CDBG funds, the applicant must hold a minimum of two public hearings, at different stages in the project development, prior to submission of the CDBG application.

The first public hearing provides a forum for considering overall community needs and potentially competing or alternative projects for CDBG funding within the local government's jurisdiction. To ensure the public participation is relevant and timely, the overall community needs hearing should be within 18 months prior to the date of application.

The second public hearing must be held once the applicant has selected the specific proposed project for CDBG funding. The purpose of the second public hearing is to give citizens and potential beneficiaries of the proposed CDBG project, especially LMI persons, or residents of the project area adequate opportunity to consider the potential impacts and benefits of the community's proposed project and to comment on it, before the community submits the application.

Program Income

Program income is income earned by a grantee from a CDBG-supported activity, such as repayments of principal or interest to a local Revolving Loan Fund generated by subrecipient loans. These funds are usually received after a project has been completed and closed out and are retained at the local level by the local government. Alternatively, CDBG grantees may form sub-grantee relationships with nonprofit organizations to administer RLFs. In this scenario, the CDBG grantee would pass the funds on to a nonprofit organization. The nonprofit would use those funds to make loans, such as for business expansion or housing rehabilitation.

When retained at the local level, CDBG program income over $25,000 annually must be used on CDBG eligible activities that principally benefit LMI persons. In addition, all program income received by a grantee after closeout must continue to be used in accordance with all the applicable federal requirements, Davis Bacon wage rates, environmental review, non-discrimination, etc.. As such, all regulations and requirements that applied during the term of the project will apply to any program income received after closeout.

Program income must be managed, maintained, and reported to Commerce annually. Commerce may also ask to review local RLF financials maintained by a local government or by an organization on a local government's behalf to ensure compliance with CDBG requirements. For more guidance on managing program income at the local level, reference the Program Income Manual in the Economic Development toolkit.

Uniform Relocation Assistance and Real Property Acquisition Policies Act

The Uniform Relocation Act requirements apply if the proposed project includes acquisition regardless of whether CDBG funds are used to relocate a business or conduct other activities such as rehabilitation, construction or demolition.

Applicants must demonstrate that the project will comply with requirements of the URA. If proposing acquisition, applicants must provide documentation that the property can be purchased or leased within six months of the date of tentative grant award. Applicants should consult the CDBG Grant Administration Manual and the URA for Public and Community Facilities toolkit for additional information.

In particular, if applicants are considering CDBG assistance to properties already occupied by residential households or businesses, a general information notice should be sent as soon as possible to all occupants informing them that the land on which they reside or building which they occupy is being considered to receive CDBG assistance and informing them that there is no intent to evict the occupants or involuntarily relocate them as a result of the proposed CDBG activity.

Land or easements must not be firmly committed for purchase with CDBG funds or with any other proposed project funds until all CDBG-required URA and environmental review procedures, including an Authority to Use Grant Funds (HUD Form 7015.16)by Commerce, has been executed. If formal agreements to purchase either land or easements with CDBG or other project funds are executed prior to conduct of the required CDBG environmental review, the integrity of the URA and environmental review process is jeopardized and CDBG funding may be withdrawn lost. Applicants are required to submit an Anti-Displacement and Relocation Assistance Plan with the application, if applicable. HUD's Guideform Residential Anti-Displacement And Relocation Assistance Plan can be found at hud.gov/sites/documents/1378X34CPDH.PDF.

NOTE: Applicants should be cautious when starting a project before Commerce has approved it and the recipient has a signed contract with Commerce. CDBG grantees are required to adhere to various federal, state, and programmatic laws and requirements. Failure to do so could result in project activities not being eligible for CDBG funds. Applicants that plan to start a project before it has been approved for funding should discuss their plans with the CDBG staff to ensure that they have sufficient matching funds as required by the program and do not take any steps that could violate federal or state laws or regulations.

Application Submission

Application Deadline and How to Submit

CDBG-ED applications are due by 11:59 pm MST on the due date. To apply for CDBG funds, eligible applicants must complete the application and submit the supplemental materials through the Montana Grants and Loans Portal. Electronic submission is preferred but you may also submit your application by first class mail or hand delivery to:

Montana Department of Commerce
Community MT Division
CDBG Program
301 S Park Avenue – P.O. Box 200523
Helena, MT 59620-0523

Alternative accessible formats of the application will be provided upon request. Commerce does not discriminate based on disability in admission to, access to, or operation of its programs, services, or activities. Therefore, individuals who need the application in an alternative format, or need to submit the application by other means, should contact Community MT at 406-841-2770. Please provide as much advance notice as possible for these requests.

Application Review Process

Community MT Division staff review CDBG-ED applications for both technical feasibility and the extent to which the proposed project relates to each of the CDBG-ED ranking criteria. Community MT may request additional information when reviewing an application to clarify responses or ensure the project meets national and state CDBG objectives. The director of Commerce makes all final decisions on project awards.

Administrative Procedures and Requirements

Please see the CDBG Grant Administration Manual on the Commerce website for information on how to administer a CDBG project at commerce.mt.gov/Infrastructure-Planning/Programs-and-Services/Community-Development-Block-Grant/CDBG-Grant-Administration-Manual.

CDBG-ED Application

Community Development Block Grant – Economic Development Program applicants should complete the CDBG-ED Summary Information below along with each of the review criteria. CDBG-ED applications will be evaluated based upon the extent to which the proposed project relates to each review criteria along with the additional information provided in the appendices. The Commerce review team will prepare and submit a report determining whether a CDBG-ED project is recommended for funding. The director of Commerce makes the final decision on grant awards and funding.

A. CDBG-ED Summary Information

1. Applicant Information

Local Government	
Address	
City	
Zip Code	
Chief Elected Official	
Title	
Phone	
Email	
Primary Contact	
Title	
Phone	
Email	
Tax ID Number	
UEI Number	

2. Subrecipient Information, if applicable

Organization	
Address	
City	
Zip Code	
Chief Executive Officer	
Title	
Phone	
Email	
Primary Contact	
Title	
Phone	
Email	
UEI Number	

3. Local Development Organization, if applicable

Organization	
Address	
City	
Zip Code	
Chief Executive Official	
Title	
Phone	
Email	
Primary Contact	

Title	
Phone	
Email	
UEI Number	

4. Project Overview

Project Summary	
Amount Requested	$
Amount Type	☐ Grant ☐ Loan
Administrative Funds Requested (maximum of 10%)	
Matching Funds (minimum of 1:1)	$
Project Type	☐ Job creation ☐ Job retention ☐ Job training
Number of jobs	___ created ___ retrained ___ trained
Number of LMI jobs	___ created ___ retrained ___ trained

5. Funding Summary

Source	Amount	Status
CDBG-ED	$	Awaiting funding decision
	$	
	$	
	$	
Total	$	

6. CDBG-Applicant Checklist

*Denotes that an item may not be applicable for every application.

Document	
Resolution to authorize submission	
Certification for application	
Local development organization and subrecipient application certification*	
Public hearing requirements	
Business plan, or alternative document	
Non-disclosure agreement*	
Anti-pirating certification	
Sources and uses	
Hiring and training plan	
LMI income certification	
Revolving loan fund plan*	
Management plan	
Project implementation schedule	

Environmental checklist	
Financial Statements ☐ Balance sheet ☐ Profit and loss statement ☐ Cash flow statement ☐ Reconciliation of net worth ☐ Tax Returns, previous year ☐ Personal financial statements, for owners with 20% or more ownership	
Financial Projections ☐ Projected balance sheet ☐ Projected profit and loss statement ☐ Projected cash flow statement	
Letters of support	
Preliminary architectural report, as applicable for substantial rehabilitation or new construction	
Anti-Displacement and Relocation Assistance Plan	

B. CDBG-ED Review Criteria

Each application will be evaluated under the CDBG-ED review criteria and will receive points depending upon the overall response to each criterion, relative to local capacity and resources. Applications will be reviewed in the order received.

CDBG-ED applicants are required to submit narrative responses that describe the relationship of their proposed CDBG project to each of the review criteria, except where otherwise noted. Applicants must provide a response to each question and are encouraged to be succinct and not repetitive. Failure to respond to a criterion or to comply with a pertinent and important application requirement will result in no points being awarded for that criterion. For ease of reference, any documentation or exhibits related to the applicant's response to a CDBG-ED review criterion should be placed in the application immediately following the applicant's narrative response to that criterion.

To avoid unnecessary duplication, the applicant may reference other parts of the application or appendices in the narrative responses to the priorities. However, the applicant should not reference another part of the application, such as a preliminary engineering report or preliminary architecture report, without including a narrative statement that provides at least a summary of what is being referenced. For example, an applicant should not simply state, "See page four of the master plan" as a response to a review criterion.

The CDBG-ED review criteria are listed below.

- Review Criterion # 1
    - Community efforts and citizen participation
- Review Criterion # 2
    - Need for financial assistance
- Review Criterion # 3
    - Need for project
- Review Criterion # 4
    - Implementation and management
- Review Criterion # 5
    - Description of jobs

Review Criterion # 1 – Community Efforts and Citizen Participation

1. Describe processes used to determine overall community development needs.

2. Describe the community's economic challenges and priorities.

3. Describe current efforts to address economic development needs.

4. Is this project consistent with the Community Economic Development Strategy or other current plans, such as a growth policy, downtown master plan, or capital improvement plan, adopted by the applicant? Please include a link to any relevant planning documents.

5. How was the project prioritized over other community projects?

6. Describe the dates, times, and locations of the two public hearings. Attach copies of attendance sheets, meeting summaries/minutes, and affidavit of publication. See Public Hearing Requirements.

    •

7. How were LMI community members' needs and comments included in the public hearing process?

8. If public comments suggest that the project could have negative impacts on the community or individuals living in the community, describe such comments and official response(s).

Review Criterion # 2 – Need for Financial Assistance

1. Describe all efforts to consider applicable federal and state, and public and private funding that could assist with this project. Demonstrate that other funding resources are not reasonably available to address the identified need.

2. Describe and document match and other contributions to carry out the proposed project, such as:
    - Cash, loans or grants
    - Absorbing some or all administrative costs, or other forms of direct financial or in-kind contributions to support the project
    - Other local efforts and contributions, please describe

3. Does the applicant have a revolving loan fund? If so, please provide a balance sheet of the RLF. Are local funds, including CDBG RLF funds, available but not being used? If so, explain why.

4. How do the proposed activities support the subrecipient's business plan or strategic documents? Provide the following information regarding the subrecipient as applicable:
   - What does the business/non-profit manufacture and/or produce
   - Over the last two years is production, sales, or need for services increasing or decreasing
   - Identify reasons why sales or services are expected to grow
   - Identify market competition
   - What factors went into the selection of the location for the business, city infrastructure, access to labor, building location, etc.
   - How will the business finance the expansion after the initial receipt of CDBG-ED funds
   - Provide experience and resumes for top management

5. Provide the subrecipient's financial statements, balance sheet, profit and loss statements, and cash flow, along with tax returns for the past two years and a complete narrative describing past and current financial operations.

6. If the subrecipient is carrying debt, fully explain, including amount, terms, and maturity date.

7. Provide two years of projections including balance sheets, profit & loss statements, and cash flow. Describe how assumptions were made.

8. Explain why the subrecipient's contribution is the maximum that could reasonably be expected.

9. Explain why CDBG-ED assistance is necessary and reasonable relative to the subrecipient's financial capability.

10. Complete the Sources of Funds (Part I) and Uses of Funds (Part II). See Sources and Uses Form. Include a narrative for each budget line item.

Review Criterion #3 – Need for Project

1. Describe how the project will provide job opportunities and strengthen the community.

2. Does the project encourage activities that support and strengthen new and existing businesses?

Review Criterion #4 – Implementation and Management

1. Submit a draft management plan. See Management Plan.

2. Execute the Affidavit of the Non-Disclosure Agreement, if applicable. See Non-Disclosure Agreement.

3. Document firm commitment of all other funding sources, including but not limited to local, state or federal funding sources necessary to complete the proposed project.

4. How will CDBG-ED project start-up requirements, including firm commitment of matching funds, be met within nine months of the date of announcement of funding award?

5. Will the existing infrastructure support the additional employees and or business expansion (housing, water, wastewater, utilities, parking, etc.)?

6. If procurement is necessary for design, implementation, and/or management of the project and has already been completed, please provide the following documents:
    - Affidavit of publication for the Section 3 notice
    - Direct solicitation of Disadvantaged Business Enterprises
    - The full request for proposals or request for qualifications
    - The affidavit of publication for the request for proposals or request for qualifications
    - Meeting minutes and or interviews with prospective entities
    - The scoring criteria used to select the successful entity

7. If procurement is necessary for design, implementation and or management of the project and has not already been completed, describe the steps that will be taken to document procurement and that it will comply with CDBG procurement requirements and state law.

8. If program income is expected as a result of this or other CDBG projects, include the program income plan or the revolving loan fund plan. See Revolving Loan Fund Plan.

9. Is the applicant compliant with the auditing and annual financial reporting requirements provided for in the Montana Single Audit Act, 2-7-501 to 522, MCA?

10. Complete the environmental checklist. See Environmental Checklist.

11. Applicants must demonstrate that the project will comply with requirements of the URA. Does the project include acquisition, regardless of whether CDBG funds will be used for the acquisition?

12. Will occupants of a business have to relocate, even temporarily, due to project activities?

Review Criterion #5 – Description of Jobs

1. Will the subrecipient create new jobs or retain current jobs of which at least 51% will be made available to LMI persons? How many, on a full-time basis? Will the $35,000 per full-time job cap be exceeded? Attach a description of the positions that will be created or retained including any education and or experience minimum requirements.

2. If jobs will be retained, why is the proposed project necessary to retain jobs, i.e., what is occurring to threaten these jobs and how will the proposed project combat that? Would these jobs be retained without CDBG-ED funds?

3. If jobs will be retained or trained, documentation that at least 51% of the jobs are held by LMI persons. is required with this application. See LMI Benefit Calculation.

4. Will the positions created or retained require training or a specialized skill? If so, how is the training or special skill provided or supported by the subrecipient?

Attach a