

CDBG Program Drug Free Assisted Housing

January 3, 1992

MEMORANDUM FOR: Gertrude W. Jordan, Regional Administrator/Regional Housing Commissioner, 5S

ATTENTION: Robert W. Dolin, Manager, Columbus Field Office, 5.3S

FROM: Randall H. Erben, Deputy Assistant Secretary for Grant Programs, CG

SUBJECT: Community Development Block Grant Program Drug Free Assisted Housing

This is in response to a memorandum dated November 19, 1991, to James Broughman from John Riordan requesting guidance on the use of equipment purchased with Community Development Block Grant (CDBG) funds. According to the memorandum, a grantee under the jurisdiction of the Columbus Office has purchased equipment costing approximately \$15,000 as a public service activity under 24 CFR 570.201(e) to increase law enforcement services in its efforts to stop the sale of illegal drugs in public and assisted housing. The city is only using the equipment in its public and assisted housing projects, but because this is not a large grantee, it has a limited number of such units and the equipment is underutilized at present. Therefore, we have been asked if this equipment can be used in other areas of the City and still meet a national objective.

Notice CPD-89-28, Use of Community Development Block Grant (CDBG) funds in support of drug abuse programs in assisted housing, was issued to remind local and state officials that CDBG funds may be used for a broad range of activities to address problems of drug abuse in assisted housing projects. The first example of eligible activities listed was:

increasing law enforcement services to stop the sale of illegal drugs in assisted housing, apprehend sellers of such drugs and reduce drug related crime in assisted housing.

It is our understanding that this activity is currently classified as meeting the national objective of benefit to low- and moderate-income persons under 24 CFR 570.208(a)(2)(D), which allows an activity to be considered as principally benefitting low- and moderate-income persons based on the fact that the nature and location of the activity is such that it can reasonably be concluded that at least 51% of the clientele will be low- and moderate-income persons.

Although the city, as a whole, is not at least 51 percent low- and moderate-income, it is our understanding that there are areas in the community which are. Under 24 CFR 570.208(a)(1)(i), an activity may be classified as an area benefit activity when the benefits of the activity are available to all residents of a particular area where at least 51 percent of the residents are low- and moderate income persons. Because increased law enforcement in specific areas to address the problem of the sale of illegal drugs would provide a benefit to all residents of each area, the City may consider this an area benefit activity when carried out in identified areas that meet the criteria in 24 CFR 570.208(a)(1)(i).

If you have additional questions, please contact the Entitlement Communities Division, FTS: 458-1577.

cc: Linda Marston, SC

