



CDBG Public Service and Planning: Frequently Asked Questions

General

Q: What's the difference between Public Service and Planning projects? Can you give an example?

A: Public Service projects fund the delivery of direct services to people, while Planning projects fund the development of plans or studies that inform future projects and investments.

Public Service projects support ongoing or time-limited services such as job training programs, youth services, or counseling for survivors of domestic violence. These funds are used to directly serve residents.

Planning projects, on the other hand, support the creation of plans and studies and not direct service delivery. Typical examples include a community development plan for a suburb or a neighborhood revitalization plan.

Q: Are Public Service and Planning grant funds disbursed upfront or through reimbursement?

A: Public Service and Planning grants are reimbursed. Subrecipients must have sufficient funds to operate the program or conduct the study upfront and Cook County will reimburse eligible costs as specified in the Subrecipient Agreement after expenses are incurred and properly documented.

Eligibility

Q: Can my organization apply for both CDBG Public Service and Capital Improvement funding?

No. Each organization can apply either for CDBG Public Service or CDBG Capital Improvement. Apart from one CDBG project, each organization is also eligible to submit one application for ESG.

Q: How do I know if my organization is located in eligible area?

A: Your organization is eligible if it is located in suburban Cook County and not in an entitlement community. Entitlement communities, which are not eligible, include: Chicago, Evanston, Skokie, Arlington Heights, Des Plaines, Elgin, Hoffman Estates, Palatine, Mount Prospect, Schaumburg, Berwyn, Cicero, and Oak Park.

Eligibility is determined primarily by whom the project serves. If your organization is located inside an entitlement municipality but primarily serves residents of non-entitlement communities, the project is eligible. For example, an organization located in Chicago that primarily serves residents of Dolton and Riverdale would be eligible.

Q: Can a municipality apply for a Public Service grant?

A: No. Only organizations designated as 501(c)(3) nonprofits are eligible to apply for Public Service grants. A municipality may only apply if it has an affiliated but legally separate 501(c)(3) organization that would apply for and administer the funds.

Q: Can a municipality apply for a Planning grant?

A: No. Because Public Service and Planning are part of the same application, and only 501(c)(3) nonprofit organizations are eligible to apply, Planning projects must be proposed by 501(c)(3) organizations that work closely with municipalities, such as nonprofit alliances or regional associations.

Q: Are faith-based organizations eligible to apply?

A: It depends. Faith-based organizations may be eligible only if the entity applying is a separate 501(c)(3) nonprofit organization that is legally distinct from the church, temple, or other religious institution itself. In addition, CDBG-funded public services must be open to all eligible participants. Organizations may not impose religious participation requirements, and services must be delivered without bias or preference based on religious affiliation.

Q: Are for-profit organizations or universities eligible to apply?

A: No. Only organizations designated as 501(c)(3) nonprofits are eligible to apply for Public Service grants.

Application

Q: What happens if I submit the application after the deadline of 5 p.m. on March 20, 2026?

A: Applications submitted after the deadline will not be accepted, with no exceptions.

Q: What happens if I forget to attach one of the required documents?

A: If you submit your application on time but are missing one or more required documents, 15 points will be deducted for each missing document. You will still be asked to submit any outstanding materials, as the application cannot be reviewed until all required documents are provided.

Q: How much money can I request for my Public Service Project?

A: Public service projects can request a maximum of \$125,000.

Q: I'm not sure whether I should demonstrate eligibility using the Area Benefit or Limited Clientele category. How should I choose?

A: Most CDBG Public Service grant recipients demonstrate eligibility through the Limited Clientele category, while infrastructure projects typically use the Area Benefit category. If you choose Limited Clientele, you must ensure that one of the following applies:

- Your program serves a *presumed low- to moderate-income population* (e.g., individuals experiencing homelessness, older adults, abused or neglected children, persons with disabilities, persons with AIDS, etc.); OR
- You can document that at least 51% of participants are low-to-moderate income, using methods such as income and household size verification, intake forms, or income-restricted eligibility criteria.

Q: Is a match required? How can I show matching funds?

A: Matching funds are not required for CDBG, but they are encouraged, as applications with a match will receive additional points. Matching funds most often come from other funders as grants or

donations and are commonly used to support staff salaries. You may also count volunteer hours as matching funds. The value of volunteer time should reflect the anticipated number of hours multiplied by a reasonable and realistic hourly rate.

Q: Our organization did not have an audit. What other documents can we submit?

A: Smaller organizations that do not receive significant federal funding (over \$750,000 per year) are typically not required to have a financial audit. In these cases, we will accept Form 990 in lieu of an audit.

Q: How do I know if the people I serve are considered “presumed” low-to-moderate-income? Who qualifies as a “limited clientele”?

A: HUD presumes the following groups to be made up principally of low- and moderate-income persons and therefore eligible under the limited clientele category:

- Abused children
- Elderly persons
- Battered spouses
- Homeless persons
- Adults meeting the U.S. Census Bureau’s definition of severely disabled adults
- Illiterate adults
- Persons living with HIV/AIDS

Programs serving these populations do not need to collect income documentation for individual clients.

Q: On page 11 of the application, I need to report the number of low- and moderate-income persons served last year, this year, and the anticipated number next year. My organization works with survivors of domestic violence, and I am unsure of their income levels. What should I do?

A: Programs that serve specific populations—such as survivors of domestic violence—qualify as serving presumed low- to moderate-income (LMI) persons under HUD guidelines. You should report all survivors of domestic violence served in the relevant time periods, as they are considered low-to moderate income for CDBG purposes.

Q: My organization offers programming for many low-income students, but students do not fall under a “presumed benefit” category. What can I do?

A: In this case, the simplest approach is to use eligibility for other government assistance programs as a proxy for income. For example, if 60% of students participate in the National School Lunch Program, they are likely to be low-to-moderate income.

Because only 51% of participants in a CDBG-funded activity must be low- to moderate-income, this threshold would be met, and the students may be considered eligible for CDBG-funded activities.

On page 15 of the application, select Option 2: “Low and Moderate Income” and indicate that income will be verified through “Eligibility Status for Other Governmental Assistance Programs.”

Activities

Q: What services are offered by organizations funded by a CDBG Public Service grant?

A: Some of the activities offered by our past subrecipients include workforce development (e.g., job training), youth programs, services for senior citizens, fair housing counselling, services for the homeless, substance abuse treatment (e.g. counseling and treatment), and services for victims of domestic violence.

Q: How can we use the CDBG grant funds? What can the funds be spent on?

A: Most subrecipients use CDBG funds to cover labor costs, including wages for employees who deliver eligible public services. In addition to labor, funds may be used for supplies and operating costs associated with the portion of a facility where public service is provided.

Q: We recently lost a funding source for our public service activities and would like to use CDBG to replace it. Is that allowed?

A: In most cases, CDBG funds cannot be used to replace a lost funding source. Under HUD guidelines, CDBG public service funds must support a *new* or *expanded* service rather than supplant existing funding. That said, if your organization is planning to expand the scope, capacity, or reach of the service, or launch a new program altogether, CDBG funding may be an appropriate option.

Q: Can we use CDBG Public Service funds to serve residents in communities that receive their own CDBG funding (e.g., Evanston, Cicero, or Schaumburg) if they are part of our larger service area?

A: No. CDBG Public Service funds awarded by Cook County are expected to be used primarily to serve residents living in non-entitlement municipalities—that is, municipalities that do not receive their own CDBG funding. While some organizations that receive Cook County CDBG funds operate across multiple municipalities, the CDBG-funded activities must be targeted to residents of non-entitlement communities, and the funds should be channeled accordingly.

Q: What happens if the staff member listed in the agreement whose salary is funded by the grant leaves the organization?

A: The organization may request an amendment to the Exhibit E to designate a new staff member or another individual who will assume the responsibilities outlined in the original agreement. Funding may continue once the amendment is approved.