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**CDBG MANAGEMENT MEMORANDUM**

**Community Development Block Grant Program - Memorandum Number 10-09**

**Date:** September 13, 2010

**To:** All Eligible Jurisdictions and Interested Parties

**From:** Thomas Brandeberry, CDBG Section Chief

**SUBJECT:** State CDBG Income Self-Certification Guide

**Purpose of this Memorandum:**

The purpose of this Management Memorandum is to:

1. Inform all grantees and interested parties that the State CDBG Program is releasing a new Chapter (Chapter 7) in the Income Calculation and Determination Guide for Federal Programs detailing the use of and requirements for income self-certification for Jurisdictions that are utilizing CDBG General Allocation funds for Public Facility and Public Service activities; and/or Economic Development Business Assistance activities.
2. Provide a Technical Assistance Guide, below, which details the reasons and the requirements for self-certification, and explains when this income process is allowed and not allowed.
3. Provide an Excel workbook that includes self-certification forms applicable to activities in Public Service/Public Facility; Micro-Enterprise Technical Assistance and Support Services; and Business Assistance Projects for use by its grantees. The use of these forms is now mandatory. These forms are online now as individual forms for your immediate and continual use.
4. This memo is superseded by the Income Self-Certification Chapter (Chapter 7) online in the Income Determination Manual at [www.hcd.ca.gov](http://www.hcd.ca.gov) and any revisions thereafter.

The Federal CDBG regulations require that individuals, families and households be Low/Moderate Income to receive assistance under the CDBG Program. The Federal regulations go further by identifying the method to be used to determine that those being assisted are at or below 80% of medium income (L/M Income).

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To date, the State CDBG Program has not given sufficient directions on the subject of income calculation methods and self-certification options. This memorandum, the online Income Manual and the associated trainings attempt to rectify this.

If you have any questions regarding this memorandum, please contact your General or Economic Development Representative.

For current forms go to: <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html>

## STATE CDBG INCOME SELF-CERTIFICATION PROCESS - TECHNICAL GUIDE -

### I. INTRODUCTION AND OVERVIEW

State of California Department of Housing and Community Development (the Department) will now allow beneficiary income documentation via a proper income self-certification process for a limited number of eligible General Allocation and Economic Development activities meeting the national objective of low-income benefit. In order to qualify and document income eligibility using this process, the grantee must use the proper income self-certification forms found in the Income Manual Appendices and follow the procedures outlined below for each corresponding CDBG activity. **Self-Certification may only be used in General Allocation - Public Facility and Public Service activities; and Economic Development - Business Assistance activities.** No other CDBG activities may use self-certification. Income requirements are not limited to grant funds. Income verification requirements apply to grant funds or CDBG Program Income.

In order to document an eligible CDBG activity meets the CDBG national objective of benefit to a low/moderate income household (80% or below AMI for their county, adjusted for household size), a state grantee is required to obtain income verification from the beneficiary prior to assistance. Under HUD regulations for CDBG state non-entitlement programs, states are given the opportunity to determine reasonable income verification methods which may be different than the Part 5 method normally completed for direct assistance programs. The state has taken this opportunity to create and implement the self-certification process for specific CDBG activities. This does not apply to any HOME funded activities, nor does it apply to any CDBG direct assistance program activities discussed in other chapters of the Income Manual. Further, to assist in making the determination of which type of Income Qualification must be used for a specific CDBG Activity a matrix was developed. It lists all the classifications of eligible activities for which Income Qualification is required for both CDBG Economic Development and CDBG General, Colonias and Native American Allocations. The matrix will show you whether a specific activity triggers Part 5 Income Qualification and/or Self-Certification and/or Limited Clientele and/or Area Benefit. This matrix can be found at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html> under Appendix D.

#### **General Allocation - Public Service and Public Facility Activities**

Before getting into specifics of income self-certification for these two General Allocation activities, it will be necessary to review the different options grantees have for documenting that these activities meet the HUD low-income national objective. There are three ways to document meeting low-income benefit for public service and public facility activities. (1) To restrict the activity to specific "limited clientele", which by their very definition are presumed to be low-income; (2) To restrict the activity to an area

where the majority of households qualify as low-income based on HUD data or income survey, “area benefit”; and, (3) To restrict the activity to only beneficiaries whose household qualify as low-income based on the income self-certification process outlined in this guide. Further, the type of restriction used for an activity is normally based on the type of service being provided, who the beneficiaries are, where the activity is conducted, and how competitive the activity will be under annual General Allocation application rating and ranking. See current General Allocation Notice of Funding Availability (NOFA) for additional information on meeting low-income benefit via limited clientele and area benefit.

While income self-certifications are not required for public services and facilities meeting limited clientele or low-income area restricted benefit, the grantee or program service provider will use the income self-certifications to collect demographic and HUD performance data required for completing Annual Grantee Performance Reporting on the activity.

### **Beneficiary Income Verification Restriction**

If a public service or public facility activity is restricted to low-income households of beneficiaries, then income self-certification process in this guide must be used on each beneficiary served. These activities are called restricted use programs and projects because one hundred percent (100%) of the beneficiaries must be documented as income eligible. Proper use of income self-certification process will enable beneficiaries of eligible public service or public facility activity to document that they meet HUD income limit standards and thus meet the national objective of low-income benefit. The income self-certification process will also allow the public service provider and grantee to collect and aggregate demographic and HUD performance data for Annual Grantee Performance Reporting on the activity.

Examples of the most typical public service activities or public facility activities are: (1) food distribution service or facility; (2) healthcare services or facility; (3) senior or childcare services or facility; and, (4) employment training services or facility. Typically, these activities are delivered by a local nonprofit or government service agency.

### **Economic Development Micro-Enterprise and Business Assistance Activities**

For the Department’s CDBG Economic Development (ED) activities, income self-certification process is used for both business assistance projects and for micro-enterprise assistance programs, although in two very different ways. These two activities are not able to use limited clientele or area benefit like the General Allocation activities discussed above. However, a business assistance project may use a second HUD national objective, *elimination and prevention of slums and blight*, which is not used by the General Allocation activities.

The HUD CDBG national objective of elimination and prevention of slums and blight does not require completion of income self-certification forms. However, completing income certification forms is necessary in order to collect HUD demographic and performance data on projects funded under this national objective. The information collected will then be used to report properly on Annual Grantee Performance Reporting on the activity.

### **Micro-Enterprise Technical and Support Service Programs**

The HUD definition of a micro-enterprise is a person starting a business or an existing business owner who is low-income qualified. Further, an existing business must be documented as having five or fewer employees, including the owner(s). Grantees qualifying persons and businesses for micro-enterprise services must document both the income status of the beneficiary and the number of employees and owners on the income self-certification form. Once qualified, the person or business is eligible for program technical assistance and support services for up to three years.

As with the previous General Allocation public service and public facility activities, using the income self-certification makes sense for the micro-enterprise technical assistance and support services because the benefit received is nominal, large numbers of persons participate, and doing a more in-depth income verification process is not cost effective based on level of benefit. The income self-certification process will also help the micro-technical assistance provider and grantee collect and aggregate demographic and HUD performance data for Annual Grantee Performance Reporting on the activity.

### **Micro-Enterprise Financial Assistance Projects**

HUD also allows eligible micro-enterprises to receive financial assistance. This is considered direct assistance and as such the micro-enterprise will need to be income qualified using the Part 5 method shown in other parts of the Income Manual, just like a home repair or home buyer program beneficiary. In some instances, a micro-enterprise may receive technical assistance under an income self-certification, but will need to have the higher level of income review done using Part 5 before financial assistance is provided. Any micro-enterprise beneficiary receiving direct financial assistance for their business must be qualified under the Department's income qualification process as outlined in the Income Determination Manual found at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html> and must be verified using third party documentation of having five or fewer employees (including owners) prior to receiving any micro financing.

### **Business Assistance Projects**

ED Allocation has a business assistance activity which does not require business owners to be low-income. Rather it requires at least half of newly hired employees

created by the business after investment of CDBG funding to be low-income. In order to document the low-income status of new hires, the Department allows for use of the income self-certification process. Thus, documenting that at least fifty one percent (51%) of new hires from a CDBG assisted business meet HUD's definition of low-income households, allows the project to meet the national objective of low-income benefit. Again, using the income self-certification makes sense for business assistance new hires because the workload related to income qualifying all job applicants is not reasonable. The income self-certification process will also help the third party verification agency or grantee collect and aggregate the demographic and HUD performance data for annual grantee performance reporting on the activity.

### **Self-Certification Forms**

There are specific income self-certification forms for General Allocation activities and Economic Development activities. The reason for different forms is because of the different HUD performance and demographic data required for the ED versus General Allocation activities and the additional verification steps needed for ED activities

## **II. INSTRUCTIONS ON COMPLETING CDBG INCOME SELF-CERTIFICATION PROCESS**

### **General Allocation Activities**

Public service or public facility activities restricted to one hundred percent (100%) low-income benefit under General Allocation must use the income self-certification method and form associated with this guide. This method will verify beneficiary income eligibility and document compliance with the CDBG national objective of low-income benefit. The Department mandates that grantees doing income self-certification use the Public Service or Public Facility Income Self-Certification Form included in Appendix E of the Income Determination Manual found on the Department's website ([www.hcd.ca.gov](http://www.hcd.ca.gov)).

The income self-certification form must be completed and certified prior to the beneficiary receiving any program assistance. The certification form is designed to be simple and self-explanatory. However, the grantee or program service provider may need to provide some guidance to beneficiary on how to accurately complete the form.

The certification form is divided into three parts. Part I is completed and signed by the beneficiary to the best of their ability. If the beneficiary has no information on one of the household member's income then they may need to go home to verify the amount then come back to complete and sign the form. Incomplete forms should not be in beneficiary files. Part I asks for income on all household members, but the program operator will make sure that only income of persons 18 years of age or older is included in the figure for total income at the bottom of Part I.

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If there is a question about who qualifies as a household member, please see the discussion of counting household members in Chapter Two, page 4, of the Income Determination Manual on the Department's website. If there is a question of what income should be included for a person in the household, see Chapter Three, page 1, of Income Determination Manual on the Department's website. You can also find information on income inclusion and exclusion and asset inclusions and exclusion in Appendix B and C of the Income Determination Manual. The program operator should be familiar with these chapters so proper guidance can be given to the beneficiary when completing the form. It is important for beneficiaries to provide information as accurately as possible so they can comfortably sign and certify the information. After completing Part I, the beneficiary can read the legal certification language, sign and date the form.

**NOTE:** The Department has provided *sample* certification language for Part I. However, it is the grantee's responsibility to have this language reviewed by their legal counsel prior to using the form. The program operator may also wish to have the language reviewed by their legal staff as well. This form may need to be translated into other languages for program use. The program operator may choose to use a professional language interpreter to help the beneficiary complete the form. Non-professional interpreters (beneficiary family members) or informal translations of this document are not recommended because of the legal nature of the certification.

Part II is completed to collect proper HUD demographic data and performance data. This data is then used in Annual Grantee Performance Reports submitted to the Department. It is important for the program operator to have an Excel file or data base that can be used to aggregate and store the information on program beneficiaries for performance reporting later on. It is noted on the form that the program operator will complete this part with any help needed from beneficiary.

Part III of the form is completed by the program operator staff. Part III consists of comparing the family size and income level of the beneficiary as certified in Part I to the most recently published county income limits (there are sample income limits on the certification forms in the appendix, but these must be updated per the county and year of the certification's completion). It is imperative that the Program Operator staff use the income limits found on the Department's website at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html>. Do not use income limits from HUD's website.

The program operator staff verifies that the beneficiary's certified income amount is below HUD's 80% income limit based on household size and current county limit. The program operator signs their name to certify this comparison and determination of eligibility, including the date. If the program applicant is over income for the program the person completing and signing Part III notes this on the form and provides a written notice to the applicant that they are not eligible at this time.

The completed income self-certification form, for a qualified low-income person or non-qualified non low-income person, is kept on file for HUD reporting and monitoring. For public service and public facility activities, the income self-certification is valid for the term of the grant. If Program Income is being used to fund the activity then the income certification is good for three years. The family may receive on going public services during the period of this certification. New certifications must be completed for new grants or after 36 months of program income funding.

### **Economic Development Activities**

*Micro-Enterprise Income Self-Certification:* As previously mentioned in this guide, the micro-enterprise technical assistance and support program requires verification of low-income family status and five or fewer employees. Information on both income and number of employees is found in Part I of the ED Micro-Enterprise Income Self-Certification Form. The income self-certification form for micro-enterprise activities must be completed prior to the beneficiary receiving any micro-enterprise technical assistance or support services. The Department mandates that grantees conducting income self-certifications use the ED Micro-enterprise Income Self-Certification Form attached with this memo. The form can also be found at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html> Appendix E.

The certification form is designed to be simple and self-explanatory. The certification form is divided into three Parts. Part I is completed by the beneficiary and includes disclosing the number of persons in their household and the income of each household member. Program operator will only count household income for persons over 18 years of age on the total household income line. For micro-enterprise programs Part I also includes the certification of number of employees and owners. In answering this question, the beneficiary must include all part-time and full-time employees separately (the business' can't aggregate part-time positions into full-time positions). If there is a question about who would qualify as a business owner (spouse or third party investor), call your CDBG ED representative to obtain clarification.

If there is a question about who qualifies as a household member, please see the discussion of counting household members in Chapter Two, page 4, of the Income Determination Manual on the Department's website. If there is a question of what income should be included for a person in the household, see Chapter Three, page 1, of Income Determination Manual on the Department's website. You can also find information on income inclusion and exclusion and asset inclusions and exclusion in Appendix B and C of the Income Determination Manual. The program operator should be familiar with these chapters so proper guidance can be given to the beneficiary when completing the form. It is important for beneficiaries to provide information as accurately as possible so they can comfortably sign and certify the information. After completing Part I, the beneficiary can read the legal certification language, sign and date the form.

**NOTE:** The Department has provided *sample* certification language for Part I. However, it is the grantee's responsibility to have this language reviewed by local legal counsel prior to using the form. The program operator may also wish to have the language reviewed by their legal staff as well. This form may need to be translated into other languages for program use. The program operator may choose to use a professional language interpreter to help the beneficiary complete the form. Non-professional interpreters (beneficiary family members) or informal translations of this document are not recommended because of the legal nature of the certification.

Part II is completed to collect proper HUD demographic data and performance data. This data is then used in Annual Grantee Performance Reports submitted to the Department. It is important for the program operator to have an Excel file or data base that can be used to aggregate and store the information on the program beneficiaries for annual performance reporting. It is noted on the form that the program operator will complete this part with the beneficiary. Because the beneficiary is not certifying this information, it is appropriate for the program operator to fill this in with the beneficiary's help.

Part III of the form is completed by the program operator staff. Part III consists of comparing the family size and income level of the beneficiary, as certified in Part I, to the most recently published county income limits (there are sample income limits on the certification forms in the appendix, but these must be updated per the county and year of the certification's completion). It is imperative that the Program Operator staff use the income limits found on the Department's website at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html>. Do not use income limits from HUD's website.

The program operator staff verifies that the beneficiary's certified income amount is below HUD's 80% income limit based on household size and county limit. The program operator signs their name to certify this comparison and determination of eligibility, including the date. If the program applicant is over income for the program or has too many employee, then the person completing and signing Part III notes this on the form and provides a written notice to the applicant that they are not eligible at this time.

The completed income self-certification form, for a qualified low-income person or non-qualified non low-income person is kept on file for HUD reporting and monitoring. For micro-enterprise technical assistance and support services, the income self-certification is valid for three years from the date of the certification in Part III. The three-year term of the certification is for both open grants and for programs funded with CDBG program income. If the micro-enterprise is an operating business and qualifies for financial assistance during or after receiving technical assistance, then the program operator of the financial assistance program must do the full Part 5 income method on the

beneficiary's household as per this income manual before the beneficiary receives any direct financial assistance.

### **Business Assistance Projects Income Certification**

This is the second ED activity that can use the income self-certification method. The process for completing the three parts of the income self-certification form are similar to the micro-enterprise program described above. The Department mandates that grantees use the ED Business Assistance (BA) Income Self-Certification Form.

The major differences between doing income self-certification for micro-enterprise and BA activities are: (1) the BA income self-certification documents require job creation or retention from the business for meeting CDBG public benefit requirement; (2) the BA income self-certification also documents low-income eligibility of newly hired employees NOT the business owner(s); (3) the BA income self-certifications are compared to business payrolls to verify job creation/retention and low-income hires are in place; (4) the BA income self-certifications are completed at different times for business assistance projects depending on if a project is claiming job retention or job creation; (5) unlike micro-enterprise, there is no verification of five or fewer employees; and, (6) there is additional HUD demographic and performance data required.

Part I of the income self-certification form is completed by the job applicant for the new position being created by the CDBG assisted business. This difference in who completes the form (a new hire verse the business owner), stems from the HUD public benefit requirement and using that requirement to help the business meet the national objective of low-income benefit.

**NOTE:** The business must not be allowed to use their own staff for completing the income self-certification with the job applicant, as that would be a conflict of interest. Income self-certifications must be done by third party representatives of the grantee or grantee staff. Improper completion of income self-certifications for business assistance will lead to repayment of ED funds to the Department.

If there is a question about who qualifies as a household member, please see the discussion of counting household members in Chapter Two, page 4, of the Income Determination Manual on the Department's website. If there is a question of what income should be included for a person in the household, see Chapter Three, page 1, of Income Determination Manual on the Department's website. You can also find information on income inclusion and exclusion and asset inclusions and exclusion in Appendix B and C of the Income Determination Manual. The third party verification agency should be familiar with these chapters so proper guidance can be given to the beneficiary when completing the form. It is important for the employee/job applicant to provide information accurately so they can comfortably sign and certify the information.

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After completing Part I, the beneficiary can read the legal certification language, sign and date the form.

**NOTE:** The Department has provided *sample* certification language for Part I. However, it is the grantee's responsibility to have this language reviewed by local legal counsel prior to using the form. This form may need to be translated into other languages for program use or the grantee may choose to use a professional language interpreter to help the beneficiary complete the form. Non-professional interpreters (beneficiary family members) or informal translations of this document are not recommended because of the legal nature of the certification.

Part II is completed to collect proper HUD demographic data and performance data. This data is then used in Annual Grantee Performance Reports submitted to the Department. It is important for the grantee to have a data collection file that can be used to aggregate and store the information on the program for CDBG reporting later on. It is noted on the form that the third party or grantee will complete this part with the beneficiary and the business. Because the business owner and beneficiary are not certifying this information, it is appropriate for the third party verification agency or grantee staff to complete Part II.

Part III of the form is completed by the third party agency or grantee staff. Part III consists of comparing the family size and income level of the new hire as certified in Part I to the most recently published county income limits. There are sample income limits on the certification forms in the appendix, but these must be updated per the county and year of the program. It is imperative that the Program Operator staff use the income limits found on the Department's website at <http://www.hcd.ca.gov/fa/cdbg/GuideFedPrograms.html>. Do not use income limits from HUD's web site.

The third party agency or grantee staff verifies that the beneficiary's certified income amount is below HUD's 80% income limit based on household size and county limit. The job verification agency or grantee staff signs to certify this comparison and determination of eligibility, including the date. If the job applicant is over income, then the person completing and signing Part III notes this on the form and provides a written notice to business regarding applicant status. The business can then use this information in their hiring process.

The last item in Part III of the business assistance income self-certification is related to verification that the job applicant was hired by the business and the number of hours the new hire is working. Once the business has hired the properly certified applicants, the third party agency or grantee will use Part III to verify the applicant was hired by the business and verify the number of hours being worked by the new hire. The grantee or third party agency must review actual pay rolls of the business to verify the applicant was hired and the full-time or part-time status of the new hire (average weekly hours

worked). This information is noted on the income self-certification form and placed in the project file for future monitoring.

To meet the CDBG BA public benefit requirement, the CDBG assisted business must hire a certain number of new permanent full-time employees (FTE) for job creation or retain a number of their existing permanent full-time employees for job retention. The number of new FTE employees for job creation or retention documented by the business is the basis for determining the maximum assistance provided to the business. So, for each FTE job documented (created or retained) the business may receive up to \$35,000 in financial assistance because it meets the CDBG public benefit requirement. Part III of the Business Assistance Income Self-Certification Form documents the level of public benefit met by the business from the new hire or retention.

In addition, the income self-certification form provides documentation of the business meeting the CDBG national objective of low-income benefit. To meet the CDBG national objective of low-income benefit, the business must prove that over 51% of the new permanent FTE jobs created or retained are provided to persons from low-income households. The one job for each loan or grant, up to the \$35,000 of assistance rule, and the 51% low-income benefit rule, both require grantees to “round up” for their compliance, so if the business borrows \$50,000 of CDBG financing then there must be two new FTE jobs created for public benefit and both jobs must be filled by low-income qualified persons. A business is not allowed to create a half FTE job position to receive half of the \$35,000 in financial benefit, nor can an assisted business create one and a quarter FTE jobs to meet the 51% low-income benefit for a project with a two job public benefit requirement. Jobs must always be aggregated into full-time equivalents when meeting CDBG public benefit and low-income national objective.

The third party program operator completing the income self-certification forms with the new job applicants is normally a job training agency or the grantee. Because of the need to create new jobs and fill over half of those new jobs with HUD eligible low-income persons, the grantee typically requires the business to enter into a third party agreement with a local job training agency. The job training agency works primarily with unemployed or under employed persons who qualify as low-income and need permanent work. In this way the job training agency can use their pool of trained low-income qualified workers to fill the new positions created by the business. This assures the grantee that the business will meet the requirement of new hires or retention and low-income benefit.

It is very important for the grantee to ensure the income self-certification(s) get done at the job application stage NOT after the employee has been formally hired. By using the job training agency to refer income eligible qualified applicants, the business can meet their low-income requirement without using the low-income qualification status as hiring criteria in their selection process. If the business does not use a job training agency for new hire referrals but hires all the necessary employees first and does the income self-

certifications afterward, then the business may find there are not enough low-income persons hired to meet the CDBG national objective. It is in the interest of the business and the grantee to ensure the income self-certification of all potential new hires are verified before a final hiring decision is made and documentation of public benefit and low-income benefit is achieved as soon as possible.

One of the major differences for income self-certification on business assistance activities verses micro-enterprise or public services is the timing of the certification. In most cases, the income certification is done prior to receiving any benefits; but, for business assistance job creation, the income self-certifications are done after CDBG funds have been disbursed to the business. In the case of business assistance, the income certification process may go on for a year or more until such time as the business has documentation on file that all FTE jobs have been created to meet the public benefit requirement and the proper number of new hires gets verified as low-income. The workforce of the business may go up and down over time so a great deal of coordination may be needed between the third party verification agency and the business personnel staff. As soon as the business can show proper FTE job creation and low-income hires, then it should be documented properly in a file and no further monitoring is needed. The business is not required to maintain the jobs over the grant period as long as it is clear that the new jobs are permanent and not seasonal or temporary. It is in the interest of the business and the grantee to achieve this outcome of meeting job creation and low-income job creation as soon as possible.

For job retention verification, the business must allow the grantee or third party agency to do income self-certifications on their existing employees before providing any CDBG financial assistance. This “before picture” of the business’s current staffing is needed for two reasons. First, the existing staffing must show that the assisted business will retain the proper number of FTE positions to justify the amount of financial assistance per public benefit requirements AND the existing business staff must be shown as being over 51% to document the business meets the low-income benefit. Second, the “before picture” is needed as a baseline that will be used for comparison to an “after picture” of the business’s staffing once the CDBG funds are provided. Thus, for business retention, the grantee or third party agency will do two sets of certifications on the business’s new employees, before and after CDBG assistance in order to verify the proper number of FTE jobs retained and those jobs are for low-income persons.

In some cases, the business may hire part-time workers to fill job positions. The Department allows for part-time hires to be aggregated into a full-time hire. The Department considers an FTE as working 1,750 hours per year. Up to four part-time positions may be aggregated to make one full-time position. Part-time positions may not be “rounded” into a full-time position. So an employee working 1,600 hours per year is considered part-time and cannot be rounded up to one FTE. An additional part-time worker must be hired and the hours of the two part-time positions will be combined to

make one FTE. The BA Income Self-Certification Form verifies the hours worked by a newly hired or retained employee to verify the FTEs created/retained.

**Workbook Attached with Income Self-Certification Forms**

- General Allocation Income Self-Certification Form
- ED Micro-Enterprise Income Self-Certification Form
- ED Business Assistance Enterprise Income Self-Certification Form