# Exhibit E3: LMC - Limited Clientele Guidance

**Record of Changes**

|  |  |
| --- | --- |
| **Date** | **Description of Change** |
| 2021 | Exhibit template added to CDBG website |
| 2022 | General Instructions updated. |
| 2024 | General Instructions updated. Footnote #1 added. |
| 2025 | Link in footnote #1 was updated. No other substantive changes were made. |

### General Instructions for Data Documentation

Activities in this category provide benefits to a specific group of persons rather than everyone in an area. It may benefit particular persons without regard to their residence, or it may be an activity that provides a benefit to only particular persons within a specific area[[1]](#footnote-1).

With respect to determining the beneficiaries of activities as LMI and qualifying under the limited clientele (LMC) category, activities must benefit a clientele that is generally presumed to be principally LMI. This presumption covers abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers.

Most projects will use census data to meet LMC; this information is available via [data.census.gov](https://data.census.gov/cedsci/). To obtain appropriate documentation, please include relevant data extracts associated with the project and any related activities. In most cases, use the most currently available ACS 5-year Estimate and table ID listed for the appropriate summary level for your project’s service area.

If using an alternate data source or method than provided within these instructions, applicants must include reasoning for not using the recommended source and other pertinent explanatory information.

### **EXample | severely disabled adults**

[**Table S1810**](https://data.census.gov/cedsci/table?q=S1810)**, ACS 5-year Estimate.**

Navigate to the subsection of the table entitled “Disability Type by Detailed Age” and calculate the total number of adults meeting the definition. Calculate total by adding the rows representing adults (Age 18 to 34 years, 35 to 64 years, 65 to 74 years, and 75 years and over) under the column for “With a Disability – Estimate”. The sum of these rows is the total used to complete the worksheet where severely disabled is selected as the beneficiary group. **Applicants must include the table and calculations as an attachment to the worksheet.**

Below is an example table S1810 showing all of the U.S., this geography (e.g., summary level) would only be appropriate where the service area (e.g., area served by the project activities) for your project is the *entire country* – this is unlikely. In this example table, the yellow highlighted figures are those that are summed to determine the **Total # Beneficiaries** in Part I of the worksheet. For your project, use the appropriate geography[[2]](#footnote-2); the appropriate geography for projects meeting LMC is most often Place or County, but will depend on the proposed project activities.

**Calculation Example, using the data included within the table S1810 below:**

*\**

*\* A quick way to verify the number of beneficiaries who are LMI is 51% is to take the Number of beneficiaries who are LMI and divide it by the Total # of Beneficiaries. This number should be 51% or greater and not 50.9999%.*

|  | **United States** | | | | | |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Total** | | **With a disability** | | **Percent with a disability** | |
| **Label** | **Estimate** | **Margin of Error** | **Estimate** | **Margin of Error** | **Estimate** | **Margin of Error** |
| **Total civilian noninstitutionalized population** | 321,525,041 | ±9,950 | 40,786,461 | ±87,161 | 12.70% | ±0.1 |
| **SEX** |  |  |  |  |  |  |
| **Male** | 157,140,289 | ±13,537 | 19,719,672 | ±47,067 | 12.50% | ±0.1 |
| **Female** | 164,384,752 | ±9,631 | 21,066,789 | ±49,497 | 12.80% | ±0.1 |
| **RACE AND HISPANIC OR LATINO ORIGIN** |  |  |  |  |  |  |
| **White alone** | 226,784,067 | ±82,395 | 30,123,435 | ±77,337 | 13.30% | ±0.1 |
| **Black or African American alone** | 39,969,583 | ±35,228 | 5,589,694 | ±24,702 | 14.00% | ±0.1 |
| **American Indian and Alaska Native alone** | 2,622,596 | ±13,688 | 443,753 | ±4,829 | 16.90% | ±0.2 |
| **Asian alone** | 18,325,414 | ±21,514 | 1,323,361 | ±9,103 | 7.20% | ±0.1 |
| **Native Hawaiian and Other Pacific Islander alone** | 597,099 | ±5,501 | 67,357 | ±1,862 | 11.30% | ±0.3 |
| **Some other race alone** | 16,578,726 | ±95,756 | 1,508,956 | ±16,453 | 9.10% | ±0.1 |
| **Two or more races** | 16,647,556 | ±64,156 | 1,729,905 | ±13,158 | 10.40% | ±0.1 |
| **White alone, not Hispanic or Latino** | 193,503,130 | ±25,032 | 27,070,784 | ±85,351 | 14.00% | ±0.1 |
| **Hispanic or Latino (of any race)** | 58,596,491 | ±6,031 | 5,396,728 | ±25,794 | 9.20% | ±0.1 |
| **AGE** |  |  |  |  |  |  |
| **Under 5 years** | 19,649,006 | ±3,593 | 136,688 | ±3,750 | 0.70% | ±0.1 |
| **5 to 17 years** | 53,514,115 | ±4,962 | 3,029,868 | ±15,619 | 5.70% | ±0.1 |
| **18 to 34 years** | 74,006,736 | ±14,209 | 4,865,509 | ±21,737 | 6.60% | ±0.1 |
| **35 to 64 years** | 123,282,960 | ±12,197 | 15,365,708 | ±53,857 | 12.50% | ±0.1 |
| **65 to 74 years** | 30,206,525 | ±5,823 | 7,359,873 | ±20,181 | 24.40% | ±0.1 |
| **75 years and over** | 20,865,699 | ±5,731 | 10,028,815 | ±26,463 | 48.10% | ±0.1 |
| **DISABILITY TYPE BY DETAILED AGE** |  |  |  |  |  |  |
| **With a hearing difficulty** | (X) | (X) | 11,471,821 | ±42,776 | 3.60% | ±0.1 |
| **Population under 18 years** | 73,163,121 | ±4,251 | 397,549 | ±6,535 | 0.50% | ±0.1 |
| **Population under 5 years** | 19,649,006 | ±3,593 | 89,867 | ±3,231 | 0.50% | ±0.1 |
| **Population 5 to 17 years** | 53,514,115 | ±4,962 | 307,682 | ±5,784 | 0.60% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 3,854,048 | ±23,086 | 2.00% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 626,737 | ±9,072 | 0.80% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 3,227,311 | ±18,961 | 2.60% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 7,220,224 | ±23,781 | 14.10% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 2,663,059 | ±11,604 | 8.80% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 4,557,165 | ±17,985 | 21.80% | ±0.1 |
| **With a vision difficulty** | (X) | (X) | 7,568,375 | ±38,079 | 2.40% | ±0.1 |
| **Population under 18 years** | 73,163,121 | ±4,251 | 565,735 | ±6,104 | 0.80% | ±0.1 |
| **Population under 5 years** | 19,649,006 | ±3,593 | 77,799 | ±2,491 | 0.40% | ±0.1 |
| **Population 5 to 17 years** | 53,514,115 | ±4,962 | 487,936 | ±5,750 | 0.90% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 3,833,566 | ±21,103 | 1.90% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 912,309 | ±8,772 | 1.20% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 2,921,257 | ±18,784 | 2.40% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 3,169,074 | ±22,505 | 6.20% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 1,255,227 | ±11,320 | 4.20% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 1,913,847 | ±15,660 | 9.20% | ±0.1 |
| **With a cognitive difficulty** | (X) | (X) | 15,456,556 | ±56,287 | 5.10% | ±0.1 |
| **Population under 18 years** | 53,514,115 | ±4,962 | 2,335,040 | ±12,823 | 4.40% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 8,847,398 | ±33,674 | 4.50% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 3,091,218 | ±17,079 | 4.20% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 5,756,180 | ±30,667 | 4.70% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 4,274,118 | ±30,444 | 8.40% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 1,541,590 | ±11,817 | 5.10% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 2,732,528 | ±22,639 | 13.10% | ±0.1 |
| **With an ambulatory difficulty** | (X) | (X) | 20,630,366 | ±75,351 | 6.80% | ±0.1 |
| **Population under 18 years** | 53,514,115 | ±4,962 | 318,839 | ±4,942 | 0.60% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 9,316,911 | ±46,944 | 4.70% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 947,468 | ±11,206 | 1.30% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 8,369,443 | ±40,504 | 6.80% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 10,994,616 | ±36,116 | 21.50% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 4,453,604 | ±18,281 | 14.70% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 6,541,012 | ±24,895 | 31.30% | ±0.1 |
| **With a self-care difficulty** | (X) | (X) | 7,882,584 | ±37,112 | 2.60% | ±0.1 |
| **Population under 18 years** | 53,514,115 | ±4,962 | 548,451 | ±7,789 | 1.00% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 3,425,923 | ±19,988 | 1.70% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 623,106 | ±7,391 | 0.80% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 2,802,817 | ±18,229 | 2.30% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 3,908,210 | ±23,853 | 7.70% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 1,243,399 | ±11,176 | 4.10% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 2,664,811 | ±17,395 | 12.80% | ±0.1 |
| **With an independent living difficulty** | (X) | (X) | 14,360,256 | ±44,150 | 5.80% | ±0.1 |
| **Population 18 to 64 years** | 197,289,696 | ±9,407 | 7,230,095 | ±25,848 | 3.70% | ±0.1 |
| **Population 18 to 34 years** | 74,006,736 | ±14,209 | 1,935,954 | ±15,211 | 2.60% | ±0.1 |
| **Population 35 to 64 years** | 123,282,960 | ±12,197 | 5,294,141 | ±24,642 | 4.30% | ±0.1 |
| **Population 65 years and over** | 51,072,224 | ±5,874 | 7,130,161 | ±30,820 | 14.00% | ±0.1 |
| **Population 65 to 74 years** | 30,206,525 | ±5,823 | 2,199,807 | ±13,811 | 7.30% | ±0.1 |
| **Population 75 years and over** | 20,865,699 | ±5,731 | 4,930,354 | ±22,441 | 23.60% | ±0.1 |

### **Example | Elderly persons (aged 62 years or older)**

[**Table S0101**](https://data.census.gov/cedsci/table?q=S0101)**, ACS 5-year Estimate.**

Navigate to the subsection of the table entitled “Selected Age Categories” and identify the total number of adults meeting the definition. Calculate total by following the row representing “62 years and over” under the column for “Total – Estimate”. This number is the total used to complete the worksheet where elderly is selected as the beneficiary group. **Applicants must include the table and calculations as an attachment to the worksheet.**

Below is an example table S0101 showing all of the U.S., this geography (e.g., summary level) would only be appropriate where the service area (e.g., area served by the project activities) for your project is the *entire country* – this is unlikely. As noted below in italics, portions of the table to the right of the “Percent” column have been removed for clarity. In this example table, the yellow highlighted figure is the **Total # Beneficiaries** in Part I of the worksheet. For your project, use the appropriate geography[[3]](#footnote-3); the appropriate geography for projects meeting LMC is most often Place or County, but will depend on the proposed project activities.

**Calculation Example, using the data included within the table S0101 below:**

*\* A quick way to verify the number of beneficiaries who are LMI is 51% is to take the Number of beneficiaries who are LMI (whole number) and divide it by the Total # of Beneficiaries. This number should be 51% or greater and not 50.9999%.*

|  | **United States** | | | | |
| --- | --- | --- | --- | --- | --- |
|  | **Total** | | **Percent** | | […] |
| **Label** | **Estimate** | **Margin of Error** | **Estimate** | **Margin of Error** | *[This and other columns of the table are excluded for clarity.]* |
| **Total population** | 326,569,308 | \*\*\*\*\* | (X) | (X) |  |
| **AGE** |  |  |  |  |  |
| **Under 5 years** | 19,650,192 | ±3,602 | 6.00% | ±0.1 |  |
| **5 to 9 years** | 19,979,039 | ±28,497 | 6.10% | ±0.1 |  |
| **10 to 14 years** | 21,107,910 | ±29,160 | 6.50% | ±0.1 |  |
| **15 to 19 years** | 21,174,955 | ±7,796 | 6.50% | ±0.1 |  |
| **20 to 24 years** | 21,820,378 | ±8,525 | 6.70% | ±0.1 |  |
| **25 to 29 years** | 23,262,155 | ±6,733 | 7.10% | ±0.1 |  |
| **30 to 34 years** | 22,223,010 | ±6,502 | 6.80% | ±0.1 |  |
| **35 to 39 years** | 21,346,055 | ±31,484 | 6.50% | ±0.1 |  |
| **40 to 44 years** | 20,000,622 | ±32,524 | 6.10% | ±0.1 |  |
| **45 to 49 years** | 20,569,969 | ±7,531 | 6.30% | ±0.1 |  |
| **50 to 54 years** | 20,970,767 | ±5,588 | 6.40% | ±0.1 |  |
| **55 to 59 years** | 21,785,721 | ±24,028 | 6.70% | ±0.1 |  |
| **60 to 64 years** | 20,315,718 | ±24,652 | 6.20% | ±0.1 |  |
| **65 to 69 years** | 17,301,772 | ±23,775 | 5.30% | ±0.1 |  |
| **70 to 74 years** | 13,246,178 | ±23,607 | 4.10% | ±0.1 |  |
| **75 to 79 years** | 9,113,714 | ±22,641 | 2.80% | ±0.1 |  |
| **80 to 84 years** | 6,079,337 | ±19,523 | 1.90% | ±0.1 |  |
| **85 years and over** | 6,621,816 | ±23,035 | 2.00% | ±0.1 |  |
|  |  |  |  |  |  |
| **SELECTED AGE CATEGORIES** |  |  |  |  |  |
| **5 to 14 years** | 41,086,949 | ±5,813 | 12.60% | ±0.1 |  |
| **15 to 17 years** | 12,559,597 | ±3,566 | 3.80% | ±0.1 |  |
| **Under 18 years** | 73,296,738 | ±4,010 | 22.40% | ±0.1 |  |
| **18 to 24 years** | 30,435,736 | ±9,483 | 9.30% | ±0.1 |  |
| **15 to 44 years** | 129,827,175 | ±9,675 | 39.80% | ±0.1 |  |
| **16 years and over** | 261,649,873 | ±16,002 | 80.10% | ±0.1 |  |
| **18 years and over** | 253,272,570 | ±3,841 | 77.60% | ±0.1 |  |
| **21 years and over** | 240,169,127 | ±22,038 | 73.50% | ±0.1 |  |
| **60 years and over** | 72,678,535 | ±23,983 | 22.30% | ±0.1 |  |
| **62 years and over** | 64,136,076 | ±23,487 | 19.60% | ±0.1 |  |
| **65 years and over** | 52,362,817 | ±4,792 | 16.00% | ±0.1 |  |
| **75 years and over** | 21,814,867 | ±3,739 | 6.70% | ±0.1 |  |
|  |  |  |  |  |  |
| **SUMMARY INDICATORS** |  |  |  |  |  |
| **Median age (years)** | 38.2 | ±0.1 | (X) | (X) |  |
| **Sex ratio (males per 100 females)** | 97 | ±0.1 | (X) | (X) |  |
| **Age dependency ratio** | 62.5 | ±0.1 | (X) | (X) |  |
| **Old-age dependency ratio** | 26.1 | ±0.1 | (X) | (X) |  |
| **Child dependency ratio** | 36.5 | ±0.1 | (X) | (X) |  |
| **PERCENT ALLOCATED** |  |  |  |  |  |
| **Sex** | (X) | (X) | 0.10% | (X) |  |
| **Age** | (X) | (X) | 1.60% | (X) |  |

1. <https://www.hud.gov/sites/documents/doc_16472.pdf> [↑](#footnote-ref-1)
2. To filter the data for your area, click on the Geos button and select County, Place, Tract, or Block Group, etc., and when an area checkbox is selected it will appear below in Selected Geographies. Click CLOSE (X in top right of popup box) to view the data. To save a copy of the table, click on Excel, CSV, or ZIP button to download the data. [↑](#footnote-ref-2)
3. To filter the data for your area, click on the Geos button and select County, Place, Tract, or Block Group, etc., and when an area checkbox is selected it will appear below in Selected Geographies. Click CLOSE (X in top right of popup box) to view the data. To save a copy of the table, click on Excel, CSV, or ZIP button to download the data. [↑](#footnote-ref-3)