

Using CDBG Funds to Rehabilitate a Knights of Columbus Headquarters

April 21, 1992

Honorable Alfonse M. D'Amato
United States Senator
Seven Penn Plaza, Suite 600
370 Seventh Avenue
New York, New York 10001

Dear Senator D'Amato:

Thank you for your letter of March 27, 1992, to the Department concerning correspondence to you from Mr. Robert F. Slingo, President of the 6893 Corporation, regarding assistance for the rehabilitation of a facility to serve as the headquarters for the Knights of Columbus, a church-affiliated organization.

The 6893 Corporation applied to the Town of Huntington for Community Development Block Grant (CDBG) assistance to rehabilitate 4,000 square feet of space in a shopping center that the corporation has recently leased to serve as its headquarters. The Town rejected the organization's request because of the group's affiliation with the Roman Catholic Church. The 6893 Corporation is a nonprofit organization formed by the Father Thomas A. Judge Council Number 6893 of the Knights of Columbus. Membership in the corporation is limited to "first degree" members of the Council, and membership in the Council is limited to Catholics.

As amended in 1990, section 109(a) of the Housing and Community Development Act of 1974 prohibits the use of CDBG funds for any activity that would discriminate on the basis of religion. While Mr. Slingo's letter indicates that the subject facility would be made available to other community groups for use at no charge, these uses appear strictly ancillary. The principal purpose of the facility is to serve as the Knights of Columbus hall. As noted above, membership in this organization is restricted to Catholics. The use of CDBG funds to assist in the development of a headquarters for an organization whose membership is restricted on the basis of religion would constitute assistance to an activity that discriminates against all persons who are not members of that religion. Thus, CDBG assistance for such an activity is prohibited by section 109(a) of the Act.

I hope this information is helpful in responding to your constituent's concerns. Thank you for your interest in the Department's programs.

Very sincerely yours,

Russell K. Paul
Assistant Secretary