

APPENDIX M

GUIDANCE FOR CONDUCTING AN INCOME SURVEY

Income surveys are used to document Low/Moderate Income Area (LMA) Benefit when American Community Survey (ACS) data is not applicable. This document provides guidance for jurisdictions that wish to conduct an income survey and submit an Income Survey Report (see final section of this document for required contents of the report) to the Department for approval. Income surveys are allowed by the Department and HUD as an alternate method of determining sufficient Low/Moderate Income Area benefit needed to document that a proposed eligible activity will meet the national objective of Low/Moderate Income benefit, according to 24 CFR 570.483(b)(1)(i).

This document should be used in conjunction with Appendix J: Determining Service Area and [HCD Management Memo 14-08](#). Prior to conducting an income survey, applicant staff and any consultants involved in completing the Income Survey Report must review all applicable information in the memo and this guide regarding income surveys. Applicant staff should contact CDBG NOFA staff to review their justification for completing the survey, as income surveys are only allowed when certain circumstances do not allow for use of ACS data. CDBG NOFA staff can also answer any questions regarding service area determination or income survey methodology.

INTRODUCTION

This document describes guidelines (methodologies) for conducting income surveys to ascertain whether or not a Community Development Block Grant (CDBG)-funded activity designed to benefit an area qualifies as primarily benefiting Low and Moderate Income (LMI) persons. Section 105(c)(2)(A)(i) of the Housing and Community Development Act (HCDA) of 1974 (as amended) stipulates that an activity designed to address the needs of LMI persons of an area shall be considered to principally benefit LMI persons if "...not less than 51 percent of the residents of such area are persons of low and moderate income." HUD's regulatory requirements for conducting a survey to determine the percentage of LMI persons in the service area of a CDBG-funded activity are located at ¹ 24 CFR 570.483(b)(1)(i) for the State program.

This revised guidance is based on the States' Program section of HUD's Office of [Community Planning and Development Notice 14-013](#). However, in some places, for purposes of clarity and statistical validity, Department policy is implemented, which may be more restrictive than Federal guidance.

Additionally, it should be noted that HUD has begun the use of American Community Survey (ACS) data for the purpose of determining Low/Moderate Income (LMI) percentage in California. This data is more up-to-date compared to the previously-used 2000 Census data. Now, income surveys will be needed less often, with the exception of service areas that do not conform to Census Block or Tract Groups.

¹ See information on the [LMISD](#)

The procedures described herein are basic survey methodologies that will yield acceptable levels of accuracy. It is required that CDBG grantees use these methodologies to ascertain that at least 51 percent of the residents of the service area of a CDBG-funded activity are LMI persons. State CDBG regulations at 24 CFR 570.483(b)(1)(a) require that the survey be methodologically sound.

Income surveys are normally used to determine the percentage of LMI persons in a program or project activity service area when ACS data provided from HUD is insufficient. The term specifically used for meeting LMI benefit national objective on an area basis is referred to as Low/Mod Area (LMA) benefit. A jurisdiction needs to have a compelling reason to conduct an income survey, because ACS data is seen as a standard for LMA determination. Some examples of area changes or circumstances that might warrant an income survey are:

- This decision could be based on area change(s) in either population or income as shown by data that is more recent than the Census or American Community Survey:
 - economic changes such as plant openings or closings (e.g., causing large-scale income increases or large-scale job losses in an area);
 - non-economic changes such as natural disasters; and/or
 - recent demographic changes not reflected in current data (e.g., population migration changes).
- It can also be necessary to complete an income survey if the service area of the CDBG activity does not conform to the Census Block or Tract groups. An income survey is used then to determine that the activity (usually a Public Improvement, Public Service or Public Facility activity) will meet LMA National Objective.
 - The Department will review each Income Survey at the time when that the activity is being determined as eligible for LMA National Objective (NOFA application activities (competitive or Supplemental) or Program Income (PI) Waiver activities submitted for approval. If the Income Survey does not follow the methodologies required in this document, the activity may be found ineligible, since the National Objective is an eligibility criterion (i.e., Income Survey did not document to the Department's satisfaction that the service area of the activity meets LMA, has over 51 percent Low/Mod persons residing there). If an element of a survey is unclear to the reviewers during the NOFA Rating and Ranking process, the Department may ask clarifying questions and the survey, or, may deem the survey invalid because the element(s) in question could not be substantiated. In this case, the activity would be ineligible due to not meeting the LMA National Objective.

Applicants may want to consider hiring a professional surveyor to conduct surveys of large areas.

The following shall apply to Income Surveys—

1. **All Income Surveys must state the reason why the survey was conducted:** HUD provides the Low and Moderate Income Summary Data (LMISD) for grantees. This is to be used when determining compliance with the CDBG National Objective of providing benefit to LMI persons on an area basis.¹ The LMISD must be used “to the fullest extent feasible” unless a grantee believes that the data are not current or do not provide enough information regarding income levels in the entire service area.

2. *The Federal CDBG regulations at 24 CFR 570.483(b)(1)(i)* require that the survey be methodologically sound, thus all steps of the survey must be documented and submitted to the Department for the income survey to be considered.
3. Income Survey documents listed at the end of this guidance document must be included in the application for funding to the Department, or in PI waivers. The Department will only review income surveys as part of a jurisdiction's application package during each annual NOFA round. The only exception is Income Surveys for Program Income Waiver activities, which can be submitted to the Department as needed, at the time of submitting the Waiver request.
4. In order to comply with HUD's regulatory requirements, for purposes of documenting benefit to Low and Moderate Income (LMI) persons, State CDBG requires income surveys to be conducted on families and not of households. See [Management Memo 14-03](#) for definition of family. Note that the CDBG Income Limits published on Department's website must be used for family income surveys to determine LMI family status. Refer to the current [income limits by county](#).
5. CDBG Regulatory Definitions of *Income and Family* are described below:

When using a survey for determining family income, jurisdictions must seek to obtain "gross family annual income" information. Thus, the income survey instrument should ask for gross annual income for the family. States are subject to the definitions of income at 24 CFR Part 5. The Department has an income manual on the webpage that provides for specific information about what is or is not included in gross family income. A survey should try to ask for income information that will reflect gross family annual income without getting so complicated as to overwhelm people completing the survey. See the link to the State's CDBG Income Determination Manual here:

<http://hcd.ca.gov/fa/cdbg/IncomeManual.html>

Definition of family is provided in CDBG federal regulations under 24 CFR 5.403. Family includes but not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

- A single person, who may be an elderly person, displaced person, nearly-elderly person, or any other single person; or
- A group of persons residing together, and such group includes, but not limited to:
 - i. A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size).
 - ii. An elderly family—a family whose head (co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living with one or more live-in aides. (A live-in aide is a person who resides with one or more elderly persons or near-elderly persons, or persons with disabilities).

- iii. A near-elderly family—a family whose head (co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.
 - iv. Disabled family—a family whose head (including co-head), spouse, or sole member is a person with disabilities. It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.
 - v. A displaced family—a family in which each member, or whose sole member, is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws.
 - vi. The remaining member of a tenant family.
 - vii. A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.
6. The Department will NOT accept income surveys that do not describe and illustrate in detail the methodology used to conduct the survey, including a copy of the survey instrument used, and an explanation of how random sampling was achieved.
 7. To be valid, submitted income surveys must be not more than 60 months old as of the date of survey completion, and no significant demographic, economic or non-economic changes have occurred in the area since the survey was originally completed.
 8. If CDBG funds are needed to pay for the survey, only CDBG General Administration (GA) funds may be used.

PLANNING THE SURVEY FOR AN INCOME SURVEY REPORT

The planning stage should include:

1. Verify ACS data is not sufficient for LMA determination (this will require establishing the service area, per Appendix J, and using census block group maps and ACS data to initially determine that the service area does not meet LMA). Submit written explanation to a CDBG NOFA Operations representative (see current NOFA for list of representatives) explaining why an income survey is needed. The Department can then provide a written approval for the use of an income survey.
2. Verify funding sources available to conduct the survey, CDBG General Administration (GA) funding, and/or other local funds.
3. Verify that survey can be completed by jurisdiction staff or if a third party consultant needs to be procured to do the survey (use of GA funds requires federal procurement standards for consultants).
 - Department staff may have contact information on consultants who conduct income surveys.

4. Secure current CDBG income limits for the county, with maximum annual amounts by family size. Current income limits are on the HCD website at the [Income Limits link](#). These Income Limits amounts must be used in the income survey instrument.
5. Document service area of the activity for which the income survey is being conducted, including the size of the universe (residential units) and the minimum number of responses required. The universe must include all housing units for families in the service area. Some housing units may house more than one family. Some service areas may have families that do not benefit from the activity, but they must still be surveyed (i.e., using just the water district's present client list excludes all those homes not presently hooked up to the water system, but are inside the service area universe).
6. Determine the appropriate survey method (door-to-door or mail or combination of both). Decide if a public meeting would be beneficial to discuss the survey with the community and help residents understand the need for the survey and the benefits of completing it.
7. Determine the random sampling method for the survey. There are Internet sites that provide electronic instruments for randomizing survey universes or provide instruction on how to do a random method manually (discussed further in this document).
8. Use the Department Sample Survey Form to create a survey instrument. Plan on translation services for the survey, when you know there are families in the survey universe that are not proficient in English. Sample Income Survey Form can be found on the [CDBG Forms and Reports](#) page on the HCD website. If a jurisdiction creates its own form, it must include, at a minimum, all the data points found in the Department's Sample Form.
9. Write up a narrative of the steps involved and roles and responsibilities of staff working on the survey.
10. Set up a file system to collect all the necessary documents listed at the end of this guidance document that is needed to complete the Income Survey Report. The file system should ensure that all information required to be submitted to the Department in the Report is collected and will be on hand at monitoring is collected.

A SUMMARY OF STEPS IN CONDUCTING LMI SURVEYS

When HUD's LMISD data are not used in documenting LMI benefit on an area basis, CDBG grantees must comply with the standards for conducting surveys located at 24 CFR 570.483(b)(1)(i). Experienced researchers employ survey methods that are easy to complete, generate consistent and accurate data, and produce results that answer specific questions. Anybody who has not conducted a survey can still do so by following a systematic approach. This guide describes procedures that may be used to determine LMA status of a CDBG eligible activity area. This guide does not restrict the CDBG grantee to one type of survey methodology, except that currently, telephone surveys are not permitted.

The steps in conducting surveys are as follows:

Step 1: Select the Type of Survey

Decide which survey method to use: a door-to-door interview, or a mailed questionnaire. Your decision should be based on available staff, size of the sample you need, and the means you have available for identifying random sample of respondents for the survey.

Some things to be aware of regarding the choice of survey method:

1. With a mail survey, use standard 12-point print and do not congest too many questions on one sheet of paper. Be aware that mail surveys generally receive a lower response, so increasing the sample size is very important.
2. The Department has deemed telephone surveys to be methodologically unsound for income survey purposes since it is difficult to be sure that the interviewee is the head of the family (or even an adult) and the information is accurate. Further, telephone records are generally required to match families with addresses, and it can be very difficult given the wide use of cell phones and the quickly declining use of landlines.

Step 2: Prepare the Questionnaire

For either the door-to-door interview or mailed questionnaire methods, the Department recommends jurisdictions use the Sample Income Survey Form posted on the Department's [Forms and Reports](#) web page. Otherwise, jurisdictions should follow these guidelines:

- At a minimum, all data points collected on the Department's Sample Form must be included in any survey being conducted.
- Questions in the survey should be short, simple and efficient. Keep the language as simple as possible. Avoid bias. Do not encourage particular answers.
- Include other questions if you like, but make sure that the survey does not take too long.
- **Do not** put income limits on the Income Survey Questionnaire.
- Avoid loaded questions (i.e., questions with no correct answers). Loaded questions increase respondent burden.

Step 3: Select the Sample

Identify the Sample: Select a procedure for identifying the sample in the service area and identify a procedure for randomly selecting the sample. Obtain a *complete* list of residents, addresses, and telephone numbers in the service area.

Determine the sample size: Determine the sample size needed in order to achieve an acceptable level of accuracy (in some cases you may be required to include all families, individuals in the service area).

Randomly select the sample: Make sure you add families to replace refusals and that the entire service area is covered, meaning be certain that you have not excluded certain areas or groups of people. **Commercial (retail and industrial) sites, vacant lots and abandoned and vacant homes should be excluded from the sample because they do not have any effect on the outcome of the survey. Temporary residents may participate in income surveys for CDBG-funded activities such as installation of sewer lines and sewage treatment plants since the temporary residents will use those types of services any time they are at their property.** Use an acceptable random selection method and decide the number of attempts and replacement procedures to be used. Ascertain that the selection of subjects to be included in the sample and replacement procedures are structured to avoid bias; for example, daytime or weekday attempts may skew response rates in favor of unemployed, retired, or single income families.

Step 4: Conduct the Survey

If you choose to conduct a door-to-door interview survey, select and train your interviewers. One of the most important aspects of any interview survey is the training of the interviewers. The quality of the results of the survey depends on how well the survey is conducted. Even in small studies involving a single researcher-interviewer, it is important to organize in detail the interviewing process before beginning the formal process. Make sure the interviewer(s) are very comfortable with the questions. The training process includes the following major topics:

- describing the entire survey;
- identifying the sponsor of the survey;
- providing the interviewer with a working knowledge of survey research;
- explaining the survey sampling logic and process;
- explaining interview bias;
- ‘walking through’ the interview process;
- explaining respondent selection process;
- explaining scheduling and supervision; and,
- explaining follow-up for non-response.

Make contact with the residents of the service area and consider writing to let people know in advance that you are coming. Or just knock on doors, if this is the procedure you select. Try again (and again) to establish contact and reschedule another interview if initial contact has not resulted in an interview. Replace families you have written off as “unreachable.”

Keep all responses, even if you write a certain response as unusable. The Monitoring unit will expect to see all documents associated with the Income Survey.

Step 5: Analyze the Results

Complete Income Survey Analysis LMI Worksheet correctly by entering in the street address for responses of each surveyed family, including your calculated LMI percentage. The Income Survey Analysis Worksheet in Excel format with imbedded calculations can be found on the [CDBG Forms and Reports](#) page.

Step 6: Document and Save Your Results

- Save the completed surveys – *in a form that does not reveal the identity of the respondents*, such as using code numbers to conceal the identity of respondents. Please note, however, the Department reserves the right to review all original surveys to ensure accuracy.
- Save the list of respondents – *in a form that does not identify their responses*.
- Save the description of the service area, the list of your sampling procedures as well as the original sample, interview sheets or completed surveys, tabulations and a list or memo describing how other survey elements were handled, including replacements and replacement methods). **Save your data.**

SERVICE AREA

The service area for the activity must be determined prior to commencing the survey. One of the crucial aspects of qualifying an activity principally benefiting LMA is the proper identification of the service area. See Appendix J for detailed instructions on service area determination. At a minimum a clear map must be developed showing the service area boundaries. If the service area is for a specific project, then the location of the project must be clearly identified on the service area map. The map should also clearly show that the service area is predominately residential. Include a narrative describing how the boundary of the service area was defined (i.e., a neighborhood park has a service area based on a 10 minute walk time for local residents). A submitted income survey that does not include a readable service area map, with identifiable boundaries, will likely be rejected by the Department.

The service area need not be coterminous with Census Tracts or other officially recognized boundaries; it is critical that the service area **be the entire area served by the activity** (see 24 CFR 570.483 (b)(1)(i)). Income data from HUD may be usable for a portion of the service area while an income survey may be used for the remaining portion of the service area, provided that each source independently meets the 51 percent Low-Mod Income requirement. If your jurisdiction has a situation like this, please contact your CDBG NOFA Operations staff, as listed in the current NOFA.

The responsibility for outlining the area served by the activity rests with each applicant/grantee. In determining the service area for an activity, the applicant/grantee must take into consideration:

- The nature of the activity: *e.g., assisting a small two-lane street in a residential neighborhood vs. that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons commuting from other areas outside the neighborhood.*
- The location of the activity: *e.g. where an activity is located may affect its capacity to serve particular areas, especially when the location of a similar activity is nearby.*
- Accessibility issues: *e.g., if a geographic barrier such as a river or freeway separates persons residing in an area in a manner that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in the service area. Language barriers might also constitute an accessibility issue in some circumstances.*

The service area of the activity must be primarily residential and the activity must meet the identified needs of LMI persons.

- An activity with a service area that is not primarily residential may not qualify under the LMI area benefit category even if the activity provides benefits to all residents in the service area, and 51percent of the residents are LMI persons. This requirement does not apply to the location of the activity itself but rather the service area of the activity. As such, it does not mean that activities located in commercial districts cannot be qualified under the LMI area benefit category on the virtue of their geography. The primarily residential test is applied to the service area of the activity. For example, activities that support the infrastructure of a commercial district composed of institutions and firms that serve a national and international clientele will not qualify under LMI area benefit. In contrast, if the commercial district is composed of stores and businesses that serve local customers such that the service area boundaries of the commercial district is around a primarily residential area with the requisite percentage of LMI residents, the activity qualifies under the LMI area benefit category. In addition, an activity “housed” in a downtown area (for example, a Public Facility, a library) but serve a larger, residential area, would qualify under the LMI area benefit category.

ADEQUATE SAMPLE SIZE

The required sampling size is determined by the size of the universe of the service area. The following table should be used to determine how many families a surveyor needs to interview to develop a survey of acceptable accuracy. For example, if you had a small water district of only 50 families, you would have to get responses from all 50 families. If the district had 500 families, you would have to get responses from 250. If the district had 5,000 families, you would have to get responses from 400.

Note: These are *minimum* responses and the Department suggests use of a larger sample (when appropriate) to ensure the income survey sample size remains adequate should some respondents be removed from the sample, and to cover any sample size attrition due to non-respondents.

Required Sample Sizes for Universes:

<u>Number of Families in the Universe</u>	<u>Minimum # of Responses</u>
1 - 50	All
51 - 55	50
56 - 63	55
64 - 70	60
71 - 77	65
78 - 87	70
88 - 99	80
100 - 115	90
116 - 138	100
139 - 153	110
154 - 180	125
181 - 238	150
239 - 308	175
309 - 398	200
399 - 650	250
651 - 1,200	300
1,201 - 2,700	350
2,701 or more	400

PARTICIPANTS / RESPONDANTS

Commercial sites, vacant lots and abandoned/vacant homes should be excluded from the survey. However, temporary residents (e.g., residents of vacation homes or seasonal cabins) may not participate in an income survey if their benefit of a service or an activity is incidental. For example, the use of a library or senior center by temporary residents would be considered an incidental benefit.

Temporary residents may participate in income surveys for CDBG-funded activities such as installation of sewer lines and sewage treatment plants, etc., as those individuals will indeed benefit from this type of activity at any time they reside at the property. The Survey document must identify whether temporary residents were included or not and why.

Non-Respondents: Even the best-prepared surveyor will typically encounter non-respondents: the resident may not be home, refuse to be interviewed, or will provide an incomplete form. Non-response rates greater than 20percent may affect the validity of the survey. **If the surveyor decides to use replacements, they must be selected through the same random process as the original group.**

Over-sampling is a good way to avoid the issue of non-respondents. As a general rule, when dealing with a universe of over 100 families, over-sampling should be 10 percent of the required responses; for a universe of over 400 families over-sampling should be 20 percent of the required responses, etc.

Note regarding PTAs: *Income surveys are not eligible for funding through PTA grants, but an income survey maybe needed to determine the study being conducted within the PTA will be eligible. (General Administration funds may be used to pay for an income survey).*

INFORMATION ABOUT RANDOM SAMPLING

The Department will accept sampling statistics that represent the population as a whole if the applicant/grantee uses a methodologically sound survey. Conversely, the Department may, after reviewing the submitted data, determine that the methodology was statistically unsound. In such cases, the Department will deem the Income Survey and thus the corresponding activity ineligible, or may use other generally recognized data such as HUD's Low-Mod Income data.

1. **Coded Questionnaires:** A simple method of coding is to place a number on the surveys or return envelopes. When the survey is received, a list of returned numbers is kept. If the response rate is not high enough so that follow-up contacts are needed, the addresses of numbers for which no response has been received can be looked up and additional surveys sent out. Information on drawing random numbers is available at www.randomizer.org or www.random.org.
2. **Random Sampling:** The guiding rule for sampling families or individuals from the larger population is the avoidance of sampling bias. That is, sampling should not systematically exclude certain types of respondents. For example, surveys conducted mid-week during the day may exclude working families and provide inaccurate statistics about the larger population. If the survey methodology contains a sampling bias, larger sampling sizes will not solve the problem because certain portions of the population will continue to be systematically excluded from the sampling.

As a general rule, each individual within the population should have an equal chance of being surveyed. Beware of using data sources that contain only certain portions of your beneficiary population. For example, some utility billing lists may contain only property owners, while the beneficiaries will be both owners and renters. Additionally, the utility billing will only include those in the service area that presently use the utility and not necessarily all homes/families. Tax rolls can be used for door-to-door surveys to provide a list of addresses in the universe, but should be adjusted for apartment buildings. City indexes and 911 maps are often helpful sources of data. After identifying the universe, the surveyor must conduct a random drawing of a number of addresses that exceeds the minimum required for that universe.

CONDUCTING THE SURVEY

The survey process should include a way to identify specific families who responded to the questionnaire while ensuring the respondents' confidentiality. For example, respondents may be particularly sensitive to the question of family income, or if a respondent's address is requested on the questionnaire, many persons may not answer the income questions or may not complete the questionnaire at all. Confidentiality must be always emphasized to the respondents. The Department recommends the survey have two pages. One page with the respondent's identifying information (name, address, etc...) and a space to assign a code number to the survey. That code number should be also placed on page two of the survey; page two contains all the survey questions. For verification purposes, the survey sheet must have a tracking number that will connect it to the person who filled out the survey.

Some acceptable survey methods that preserve the anonymity of the respondent are:

1. **Methodology:**

- a. **Door-to-Door Interviews:** The surveyor may hand deliver the survey to the respondent and conduct the survey orally. It is crucial that the interviewer works during different times of the day and on weekends to avoid excluding certain groups. Door-to-door interviews are a reliable method of data collection and tend to receive a high response rate. However, they are the most expensive and the responses may be influenced by the interviewer's presence and characteristics.
 - b. **Mailed Questionnaires:** The survey form must be accompanied by a letter of explanation and a self-addressed stamped envelope. Upon receipt of the completed survey, the address can be checked off the address list and the envelope and survey can be separated. Mail surveys are generally less expensive to conduct and can avoid the issue of sampling bias by surveying the entire universe. The main disadvantage of mail surveys is they can have a low return rate. If the applicant uses this method, a statement ensuring respondent confidentiality should be included. HUD does not recommend mail surveys unless at least one follow-up letter or physical attempt to conduct the survey at the residence is made to obtain an adequate response rate.
 - c. **Telephone Surveys:** Telephone interviews are **not an acceptable** methodology as discussed above.
2. **Publicity:** To promote citizen participation, it may be worthwhile to arrange advance notice regarding the survey, including date, reason and method of survey. As with all aspects of the survey, any publication must be worded so that it does not bias the results.
3. **Confidentiality:** Emphasis must be made to survey participants that their answers will be kept confidential. People are more likely to provide honest answers if their answers are to remain confidential. You should do your very best to maintain this confidentiality. **As noted above, it is recommended that the respondent's name, address, and telephone number appear only on the cover sheet of the questionnaire. After the survey is completed, the cover sheet may be numbered and separated from the actual interview sheet. If the cover sheets and the questionnaires are both numbered, they can be matched if necessary.** It is suggested that the grantee make reasonable efforts to protect the privacy of those surveyed and follow applicable State and local laws regarding privacy and obligations of confidentiality. However, please note that the all information, including confidential survey forms, must be maintained by the grantee for monitoring purposes.

The reason for collecting income data is for the applicant jurisdiction to make a determination of how many persons surveyed fall into the categories of Low/Mod (80 percent AMI or under) and Non-Low/Mod (over 80.01 percent AMI). The current income limits by county, adjusted for family size, are published by HCD annually and must be used in calculating the percentage of

the population that falls within each category. Surveyors should consult the HCD webpage and use the current income limits *for the county where the service area is located* in making their determinations. [Current income limits](#) can be found at the link.

LIFESPAN OF A SURVEY

Department policy is that an income survey expires after **60 months** from the date of the Department's approval of the eligible activity but the grantee would have to be sure that there have been no significant demographic, economic or non-economic changes in the area during that time. Such changes may include factory openings or closings, layoffs by a major employer in the service area, or the occurrence of major disasters (such as tornados hurricanes, earthquakes, etc.). Note that even if a survey is current, it cannot be used for a different activity in a different service area; however, it might be usable for another activity in the same service area. Also, if the grantee does not maintain the confidential data survey forms and the Department is unable to determine, at monitoring, that the submitted data can be verified, the survey will no longer be able to be used.

SAMPLE SURVEY FORM

A sample survey questionnaire is posted on the Department's website (link below) to assist the applicant in using a method of surveying that allows for validation and, at the same time, preserves the confidentiality of the respondent. Applicants may include other questions designed to elicit information that they determine is important. However, experience has shown that overly detailed surveys may adversely affect the response rate.

The questions are designed to provide data regarding family size, income, and other reporting requirements. Family size and income are of particular significance in determining benefit to an area.

The Department's Survey Form can be found on the [CDBG Forms and Reports](#) page.

CALCULATING THE SURVEY RESULTS

Interviewers should turn their completed surveys over to the person who will tabulate and analyze the data. That person should review each survey to ensure that it is complete and that each question is answered only once and in a way that is clear and unambiguous. Questions or errors should be clarified. It also may be necessary to contact a respondent to clarify incomplete or ambiguous responses. If a question or an error cannot be resolved, a replacement should be added and the new respondent contacted. Note that editing is an ongoing process because even after you have started to tabulate or analyze the data, you may come across errors that need correction.

All survey questionnaires should be saved, **including** those determined to be unreliable.

After all the data for each family has been collected, edited and tabulated, it is time to calculate the total percentage of **Low/Mod persons**. The Department has created Excel worksheets with imbedded calculations for correct tabulation of results, based on size of survey. It can be found on the [CDBG Forms and Reports](#) page.

Steps for using the worksheet:

1. Determine your county's 80 percent of Area Median Income by family size by going to the HCD website via this link: [Income Limits](#) and looking up your county data.
2. Fill in each income amount under the appropriate family size from the 80 percent line on the Income Limits sheet for your county.
3. List each address and the number of people in the family at that address, and the associated income. An address may be listed more than once if more than one family resides at the same address.
4. After all addresses surveyed are loaded into the worksheet, the LMI percentage will calculate near the top of the page. If that calculation is 51 percent or above, the National Objective of LMI/L/MA has been met. If the calculation is 50.99 percent or below, the National Objective of Low/Mod Area Benefit has not been met.

DOCUMENTING THE SURVEY RESULTS

It is important that the results of the survey be documented for future reference and for auditing/monitoring purposes. For purposes of data integrity, the surveyors should not be the staff entering the data into the survey analysis worksheets.

Documentation should be retained as follows:

1. Separate all identifying information from the surveys. When the survey is complete, the respondents' identifying information (e.g., name, address, telephone #) must be separated from the surveys and **retained**.
2. Make sure that the code numbers are clear and legible on both the identifying information page and the survey page in the event the surveys need to be verified against the respondent information during monitoring or survey methodology verification.
3. Keep the completed surveys. This provides evidence that the survey was actually conducted and must be made available to the Department upon request for validation and/or monitoring purposes.
4. Keep all responses, even if you exclude a response due to insufficient information.

SUBMITTING THE SURVEY RESULTS (Income Survey Report)

All of the items listed below must be included with the Income Survey Report as part of an application submission or PI Waiver submission to the Department. Much of the information below will be submitted in a narrative form. As such, incomplete or limited information could result in the Department determining that the lack of information/description will not allow the Department to approve the survey and therefore the activity.

Explain/describe/provide the following:

1. **Why was a survey necessary? Why couldn't HUD's LMISD data be used?**
2. Describe the methodology used for the survey process.
3. Describe the methodology for determining the surveyed service area (fully describe the service area and why the service area boundaries have been used).
 - a. Include a map of the jurisdiction and a detailed map the service area, showing project location and residential make-up of the area.
 - b. Identify other similar activities/projects (e.g., other parks).
4. Describe the survey sampling logic and process (how sampling size was determined). What is the total population within the service area, how many addresses, and so on?
5. Describe the respondent random selection process. Were families excluded and why?
6. Describe the scheduling as well as who performed and supervised the survey process. Dates of mailing, dates of door-to-door survey and date when surveying was complete.

7. Describe the follow-up process for non-respondents. How many addresses of the total did not respond?
8. Describe the replacement process for non-respondents.
9. How random sampling was obtained. Why this sampling would result in an accurate determination of Low/Mod percentage?
10. Include a copy of the LMI Worksheet with the results (the worksheet can be found on the [CDBG Forms and Reports](#) page). *The Worksheet must include the street addresses for all respondents.*
11. How were surveys coded to ensure confidentiality but also to provide an audit trail?
12. Describe how temporary resident families were counted or not and why.
13. Include a blank copy of the actual Survey Questionnaire used.
14. Submit the completed Survey Analysis Excel form found on the CDBG [Forms and Reports](#) page. ALL completed surveys must be kept in the jurisdiction's file for validation and/or monitoring purposes.
15. Include a list of persons involved in the income survey and their individual roles.

Keep all survey back-up documentation for the same retention period per CDBG grant/PI Waiver requirements.