



TEXAS GENERAL LAND OFFICE

Documenting Beneficiaries

COMMISSIONER DAWN BUCKINGHAM, M.D.

The Texas General Land Office (GLO) administers Community Development Block Grant–Disaster Recovery (CDBG–DR) and Mitigation (CDBG–MIT) funding across disaster–impacted areas of the state. *Eligible applicants must demonstrate a National Objective for the applicable eligible activities, including:*

1. Benefitting low–and moderate–income (LMI) persons
LMA– area benefit LMC–limited clientele
LMH–housing LMJ–jobs
LMHI–housing incentives
2. Slum and Blight (SB) aids in the prevention of slum and blight.
3. Urgent Need (UN) addresses an urgent need

Low and Moderate Area benefit (LMA) is the most frequently used National Objective to support CDBG–DR and CDBG–MIT projects.

- **LMA** may be used when the service area is primarily residential and at least 51% LMI, as indicated by Census low- and moderate-income summary data (LMISD) or survey data.
- **Area benefit** is based on where the beneficiaries live within the service area.
- **Service area** is based on the geographic area that will benefit from the eligible project.

The two acceptable methods for documenting beneficiaries are:

- **Use of Census LMISD**

Based on the American Community Survey 5-year estimates published by HUD

Service area geography aligns with Census tract, block group, or place

Service area must serve a significant portion (more than half) of the applicable Census geographic area

- **Use of surveys:** Income surveys are typically used when the service area does not align with the Census geographic area and serves less than a significant portion of the Census geographic area. Surveys are usually conducted by completing a door-to-door questionnaire and may require multiple attempts to ensure accurate results.

Proper documentation of beneficiaries during both the application and contract term are federally imposed requirements and cited in GLO’s Subrecipient contract. The GLO provides general resources to support, plan and implement applicants’ beneficiary verification activities.

GLO Recovery Site Resources:

- Documenting Beneficiaries Manual: Census and Survey Methodology
- LMISD, survey forms, Random Number Generator, and Race/Ethnicity/Gender calculator
- The GLO mapping tools on the [*Geographic Information Systems \(GIS\) Resources website*](#)



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✓ Best Practices

Consider project location and determine service area early during project development.

Determine whether the identified service area aligns with a Census geographic area to plan for the level of effort required to accurately document beneficiaries.

Use GLO mapping tools to investigate proposed service area and project alignment.

Design clear and legible maps to define service area, project location, and Census geographic area.

Include a narrative to support the service area selected and corresponding beneficiaries.

Use survey method for projects that have a small benefit area or do not align with Census geographic areas represented in the LMISD.

If using the survey method, survey 100% of households for project benefitting less than 200 households and use a random survey for more than 200 households.

Ensure forms are complete and legible and inform the community early to maximize participation.