Documenting Beneficiaries Manual

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TEXAS GENERAL LAND OFFICE

Community Development and Revitalization Department

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Table of Contents

1. Introduction

Each proposed activity included in an application for Texas General Land Office (GLO) Community Development and Revitalization (CDR) Community Development Block Grant-Disaster Recovery (CDBG-DR) and CDBG-Mitigation (CDBG-MIT) program funds must meet one of the following national objectives. The national objectives are:

- LMI, benefitting low- and moderate-income persons
- SB, aid in the prevention or elimination of slum and blight (not applicable under MIT funding)
- UN, urgent need,
- UNM, urgent need mitigation (CDBG-MIT only)

The CDBG-DR and CDBG-MIT programs require applicants to document and report the total beneficiaries and total LMI beneficiaries of each proposed application activity regardless of the national objective met by the activity. Beneficiaries must be documented for each activity proposed in an application for CDBG-DR or CDBG-MIT funding.

The service area of the activity must be primarily residential for an activity to qualify under the LMI area benefit category. 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 at least 51.00% (NOT 50.99%) of the residents are LMI persons.

This manual is primarily for infrastructure activities for documenting beneficiaries and how to meet the LMI, UN and UNM national objectives.

2. HUD National Objectives

2.1 Low- and Moderate-Income (LMI)

Applicants can meet the low- and moderate-income national (LMI) objective through demonstrating an area, limited clientele, or a direct benefit of the proposed project. These are discussed in detail below along with how to document LMI populations. Activities principally benefiting low- and moderate-income persons determinations:

2.2 Area Benefit

Projects, of which the benefits are available to all the residents in a particular area, where at least 51.00% of the residents are low- and moderate-income persons. The residents claimed as beneficiaries in the target area must be based on the entire area served by the project. A project that serves an area that is not primarily residential in character shall not qualify under the area benefit criterion.

2.3 Limited Clientele Benefit

A low- and moderate-income (LMI) limited clientele project is a project that provides benefits to a specific group of persons rather than everyone in a defined service area. It may benefit particular persons without regard to the area in which they reside, or it may be a project that provides benefit on an area basis but only to a specific group of persons who reside in the area. In either case, at least 51 percent of the beneficiaries of the project must be LMI. Due to certain statutory limitations, the regulations preclude various activities from qualifying under this subcategory, so contact the GLO to see if limited clientele is applicable. To qualify under this subcategory, a limited clientele project must exclusively benefit a clientele who are generally presumed by HUD to be principally LMI persons.

The following groups are currently presumed by HUD to be comprised principally of LMI persons:

- Abused children;
- Elderly persons;
- Battered spouses; Homeless persons;
- Adults meeting Bureau of Census' definition of severely disabled adults;
- Illiterate adults;
- Persons living with AIDS; and
- Migrant farm workers.

2.4 Direct Benefit

For applicants using surveys to establish benefit, all forms (survey questionnaires, survey tabulation form(s), and the survey locations form(s)) must be submitted with the application for GLO verification.

2.5 Slum and Blight

To qualify an application activity under the national objective of Slum and Blight, activities need to address one or more of the conditions which have contributed to the deterioration of an area designated as a slum or blighted area.

2.6 Urgent Need

To qualify an application activity under the national objective of Urgent Need, activities need to alleviate emergency conditions. In addition, the applicant is required to document and report the total beneficiaries and total LMI beneficiaries of the proposed application activity.

2.7 Urgent Need Mitigation (CDBG-MIT)

The Urgent Need Mitigation is limited to CDBG-MIT activities. The applicant is required to document and report the total beneficiaries and total LMI beneficiaries of the proposed application activity. In addition, the proposed project must:

- meet the criteria for the urgent need mitigation national objective, each applicant must document that the activity: (i) Addresses the current and future risks as identified in the State's Mitigation Needs Assessment of most impacted and distressed areas; and (ii) will result in a measurable and verifiable reduction in the risk of loss of life and property

To provide an adequate response to meet the Urgent Need Mitigation criteria, applicants must document how the proposed activity will address the following :

- What risks are affecting the project benefit service area?
- What past events have occurred within the project benefit service area?
- What type of mitigation techniques or enhancements will take place that will result in a measurable and verifiable reduction in risk and loss of life of property for the benefit service area?
- What are the measurable and verifiable reduction(s) in risk and loss of life of property for the benefit service area?

The UNM national objective is limited to CBDG-MIT activities only.

3. State of Texas Waivers

3.1 Use of the "Upper Quartile" or "Exception Criteria" for Low- and Moderate-Income Area Benefit Activities (State of Texas only)

Under the "Upper Quartile" or "Exception Criteria" Low- and Moderate-Income Area Benefit Activities, HUD permits an exception for specific communities that are allowed to use a percentage that is less than 51 percent to qualify activities under the LMI area benefit national objective criteria. In these communities, activities must serve an area that contains a percentage of LMI residents that is within the upper quartile of all census-block groups within its jurisdiction in terms of the degree of concentration of LMI residents.

On September 28, 2020, HUD published Federal Register notice 85 FR 60821. This notice established an "Upper Quartile" or "Exception Criteria" for the State of Texas for non-entitlement counties. The exception criteria for non-entitlement counties applies for the following grants:

- Public Laws 114-113 and 115-31 for recovery from 2015 disasters.
- Public Laws 114-223, 114-254, and 115-31 for recovery from 2016 disasters.
- Public Laws 115-56, 115-123, and 115-31 for recovery from Hurricane Harvey disaster.
- Public Laws 115-254 and 116-20 for recovery from 2018 disasters.
- Public Law 116-20 for recovery from 2019 disasters.
- Public Law 115-123 for mitigation activities.

HUD updates the list of entitlement communities and non-entitlement counties that qualify under this alternative requirement, and the calculated 'exception percentages'' for each.

3.2 Waiver: Use of the "Low- and Moderate-Income Summary Data – State Median Income" Data (State of Texas only)

The State of Texas has been granted the authority, via waiver in Federal Register notice 85 FR 60821, to utilize statewide median income for LMI determinations across the most impacted and distressed (MID) areas for specific disasters. A county with a median income greater than the statewide median income may utilize the statewide median income for LMI national objective determinations for the following grants:

- Public Laws 115-56, 115-123, and 115-31 for recovery from Hurricane Harvey disaster.
- Public Laws 115-254 and 116-20 for recovery from 2018 disasters.
- Public Law 116-20 for recovery from 2019 disasters.
- Public Law 115-123 for CDBG-MIT.

3.3 Waivers Applicability by Disaster

Disaster Name / Year	Low- and Moderate-Income Summary Data (LMISD)	Non-entitlement "Upper Quartile" or "Exception Criteria" (UQ)	Low- and Moderate-Income Summary Data – State Median Income (LMISD SMI)
Hurricanes Ike/Dolly	Eligible	---	---
2015 Disasters	Eligible	Eligible	---
2016 Disasters	Eligible	Eligible	---
Hurricane Harvey	Eligible	Eligible	Eligible
2018 Disasters	Eligible	Eligible	Eligible
2019 Disasters	Eligible	Eligible	Eligible
CDBG-Mitigation	Eligible	Eligible	Eligible
2021 Winter Storms	Eligible	---	---

4. Project Service Area

The first step in the process of documenting beneficiaries is to identify the project location. Step two is to determine the service area. The service area indicates the individuals that will benefit from the proposed improvements. Determination of the service area may require consultation with the project engineer to appropriately identify the project beneficiaries.

4.1 Project Service Area Maps

Maps must be provided for each project and/or site proposed in the application that clearly plot GPS coordinates and includes project/site numbers with any other necessary identifying information. Maps should be titled and/or numbered with the corresponding project title. GPS coordinates are required for each site. Latitude and longitude must be entered in Decimal Degrees (DD) to five decimal places (e.g., 0.00001).

Maps must be legible and reproducible. Care should be taken in copying maps so that project activities which may have been designated by a colored mark are still identifiable. Project Area Mapping is a required element for every proposed project. Project Area Map information must coincide with and be supported by Beneficiary Map information

Maps and other supporting documentation required to justify the beneficiaries may be requested by the GLO, as necessary.

4.2 Project Beneficiary Map(s)

All applications must include a project map(s) identifying the benefit area. Project service area maps must clearly show all the census geographic areas (e.g., census tract, block group) within the project service area. Maps must clearly show:

- Boundaries of the city, county;
- Locations of the service area community or communities within the city, county; and
- Locations of all proposed project sites per activity within the service area (e.g., sewer/water lines, lift stations, street pavement, water storage tanks, wastewater treatment plants etc.)
- Identifiable features such as named streets, railroads, streams, etc.
- Legible labels of all applicable census geographic areas (e.g., census tracts, block groups).

5. Methods to Document Beneficiaries

Once an applicant has identified the service area of a proposed activity, there are two acceptable methods that may be used to document the total beneficiaries and the number of LMI beneficiaries:

5.1 LMISD Method:

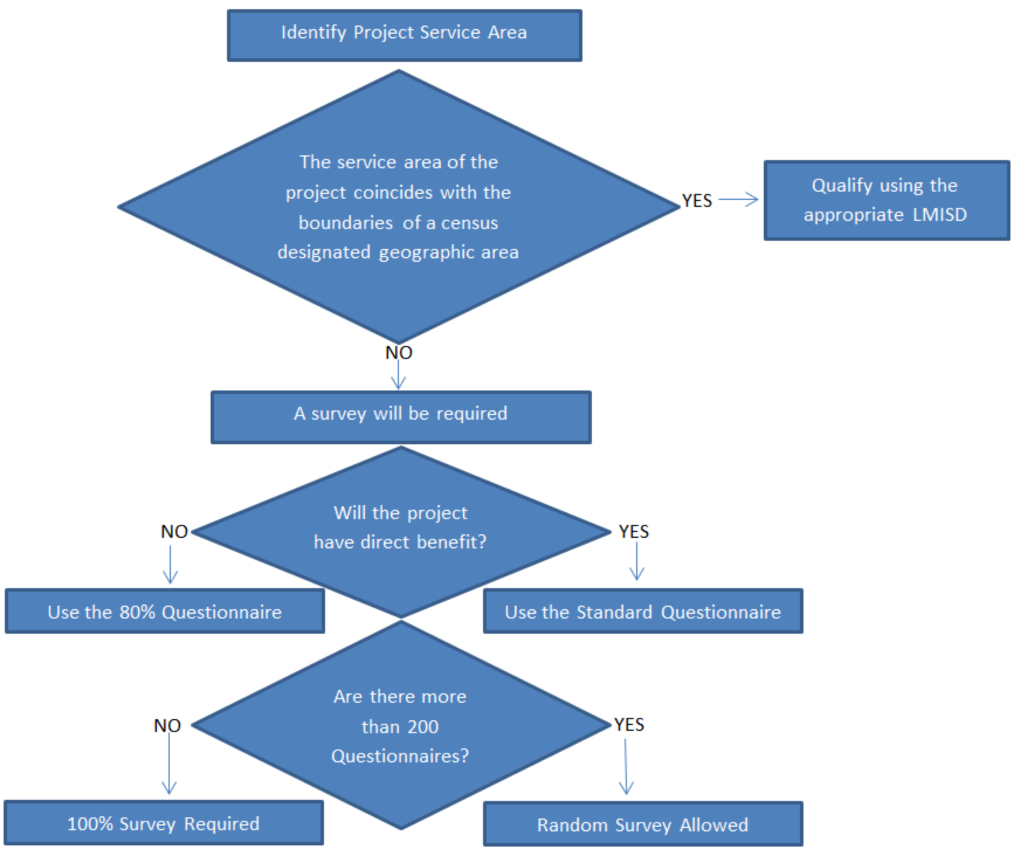
The use Low-and Moderate-Income Summary Data (LMISD) with waiver as applicable to document beneficiaries when the service area can be “reasonably delineated” by LMISD geographies, such as Census Block Group delineations, Census Place, or Counties. The effective LMISD for a particular program is accessible through the applicable page of the GLO website and is extracted from the data provided by HUD.

1. To support this determination, a statement from a qualified individual (e.g., engineer, architect, utility operator, local planning official) should be provided to explain how the service area was determined. This determination should be clear and logical, as supported by specific details about the existing conditions, the proposed project’s impact, and anticipated outcomes.
2. A geography that is entirely enclosed by a service area may be included in the calculation of beneficiaries. In instances where a geographic area is partially overlain by the service area, a determination of the population within the service area must be calculated. The population calculated must reflect a significant portion of the identified geographic area. If the population is less than a significant portion, where significant is more than half, the applicant will need to use the survey method.
3. Applicants cannot combine place and block group data as these data sets have overlapping areas and would likely “double-count” beneficiaries.
4. The race, ethnicity, and gender for the total beneficiaries claimed for the proposed project must be tabulated and provided.
5. The race, ethnicity, and gender data from the most recently available DP05 Table ACS 5-Year Estimates Data from American Community Survey (ACS) DEMOGRAPHIC AND HOUSING ESTIMATES must be provided.
6. The DP05 table data must correspond to the Census Block Group(s), Census Place(s), or County(ies) that was/were used to determine service area.
7. To calculate the race, ethnicity, and gender for the total beneficiaries use the Race/Ethnicity calculator form.
8. The following supporting documentation must be provided with application:
9. LMISD data that corresponds with the total beneficiaries and total LMI beneficiaries and project service area.
10. DP05 (5-year estimate)
11. Race/Ethnicity/Gender Calculator

5.2 Survey Method:

1. Use the survey method to document beneficiaries for projects that have a small benefit area or for proposed project activities with a service area that cannot be "reasonably delineated" by standard census geographic areas (place, census tracts or block groups).
2. The combination of survey data and LMISD is not an acceptable method of documenting beneficiaries. In situations where the service area extends beyond the boundaries of a census geographic area but does not benefit a significant portion of the area beyond the boundary of the census geographic area, a survey of the entire service area will be required to accurately reflect beneficiaries.
3. Note: Margin of Error (MoE) in 2019 LMISD and later. For the 2019 LMISD and later, HUD now includes the MoE for all geographies and requires that the use of alternative data (i.e., an income survey) have a MoE less than the LMISD MoE. The survey instructions in this guide are based on a 90% confidence level. Before an applicant undertakes a survey for a geographic area, they must check the MoE in the current LMISD to ensure that the survey will meet this requirement.

Figure 1: Steps to Determine Method to Document Beneficiaries



6. Public Housing and Nursing Homes

Public Housing Authority (PHA) certifications for income qualified units can only be included in a 100% survey or if the entirety of the PHA is within the proposed project's service area. If a random survey is conducted, each unit must be treated as a separate household in the comprehensive address list and a questionnaire must be completed for each unit as selected by the random number generator. When using LMISD, PHAs are accounted for in this data and cannot be added.

Nursing homes are considered a "business" and not part of the beneficiary population For the purposes of beneficiary identification. This provision is consistent with the LMISD, which excludes nursing home facilities from this data.

7. Survey Requirements

The GLO Program has set the following survey requirements:

- All required survey documentation must be submitted to GLO for verification. Survey Questionnaires completed by the applicant that do not meet the survey submission requirements may not be used to document the beneficiaries for an application, unless waived in writing, by the GLO program.

- The applicant must provide the following documentation, at a minimum, for each activity included in an application where surveys were completed to document beneficiaries:

    - Signed Survey Tabulation Form(s) (documents beneficiaries claimed for each activity or target area) Primary Survey List (comprehensive list of addresses of the households[1] in the service area)
    - All Survey Questionnaires (including responses, non-responses, and vacancies for each activity) Map of all households surveyed indicating corresponding individual survey numbers (may be a combination of multiple maps for large service areas)

- For a completed survey to be eligible, it must meet the following requirements:

    - **Survey Size**: For proposed projects benefitting less than 200 households[2], the applicant must perform a 100% survey effort of households benefitting from proposed project. For surveys benefitting more than 200 households, a random survey may be conducted.
    - **100% Effort**: the applicant must demonstrate a 100% effort in contacting 100% of households in the survey (including all vacant housing units, which an applicant shall indicate on the Survey Questionnaire as vacant).
        - For door-to-door surveys at of minimum of two contact attempts (if initial attempt fails) must be made to contact households.

[1] In this guidance, "household" and "family" are used interchangeably; however, if multiple "families" reside in the same household, a separate questionnaire must be completed for EACH family.

        - To document a property as vacant, the survey must reflect two attempts and notes on the survey form or a log indicating how the property was determined to be vacant.
    - **80% Response**: Applicants must obtain at least an 80% response rate from all households in the survey.
    - **Telephone Surveys**: At least four attempts must be made to contact household.

    - *NOTE*: Surveys that do not meet these requirements will be disqualified, which may also result in disqualification of the application.

- Any Survey Questionnaire which does not include the following information may be considered a non-response or a non-LMI household, as appropriate:

    - Location where the survey was conducted (city or county)
    - Respondent's street address
    - Date and time for each contact attempt, (minimum of two at varying times of day, as appropriate to improve likely response)
    - The selected HUD Section 8 Income Limits inserted for family sizes 1 through 12
    - Conflicting information between the identified family size and the family size income limit if it is higher than the correct income limit for that family size (e.g., a family with 3 persons is asked to compare the family's income to the income limit for a 4-person family)
    - Number of males and females
    - Race and ethnicity numbers
    - Survey questionnaire numbers

- An applicant may use a previously completed and verified survey to document the beneficiaries for a proposed activity within an application if the following requirements are met:

    - The previously completed and verified survey was conducted in accordance with the methodology specified within this manual.
    - The Survey Questionnaires were completed no more than five (5) years prior to the application deadline (for programs with an actual application deadline) or the actual date of submittal of an application (for program without an application deadline).

8. Survey Methodology

Step 1: Identify the Benefiting Population/Households

The first step in the survey process is to define the service area of the proposed project and identify all of the households that may benefit. For example, if a proposed project involves re-shaping of drainage canals, all homes within the service footprint should be considered in the survey if receiving benefit from the activity, irrespective of the physical address.

Step 2: Determine Which Type of Questionnaire to Use

There are two types of questionnaires available (each available in Spanish), the Standard questionnaire and the 80% ONLY questionnaire. The Standard questionnaire MUST be used when the proposed project has a direct benefit. This questionnaire captures the 30%, 50%, and 80% Annual Median Family Income (AMFI) data required for reporting. The 80% questionnaire MAY be used when the proposed project has an indirect benefit. This captures whether the benefitting household is LMI or non-LMI.

- Direct Benefit[2] projects include, but are not limited to:
  - Installation/replacement of On-Site Sewage Facilities
  - Installation/replacement of first-time sewer and/or water yard lines
  - Any work on Private Property
- Indirect Benefit projects include, but are not limited to:
  - Water Distribution Lines or Sewer Collection Lines in Residential Areas
  - Water Treatment, Water Supply, Water Storage Improvements
  - Street Improvements
  - Flood and drainage improvements

Step 3: Determine the Survey Type

Surveys benefitting 200 or fewer households must perform a 100% effort of 100% of benefitting households with an 80% response rate. Surveys benefitting 200 or more households MAY utilize the "random sample methodology" as outlined in Steps 6-11 OR perform a 100% effort of 100% benefitting households with an 80% response rate.

However, it should be noted that surveying only the randomly selected households may result in a failure to meet the 51.00% LMI threshold – even if the actual total population is eligible and/or the 80% response rate. Applicants are encouraged to consider these possibilities before conducting a random survey.

Step 4: Conduct the Survey and Complete the Survey Questionnaires

With all the benefitting households identified, attempt to complete a Survey Questionnaire for each household. Be mindful that individuals may be hesitant to disclose their household's income, so a thorough explanation as to why you are requesting their information is crucial.

It may be advantageous to publish an article in the local newspaper or distribute notices about the locality's efforts to obtain CDBG-DR or CDBG-MIT funding that also includes information about when Survey Questionnaire interviewers may be in the various neighborhoods and why their information is important. Applicant communities might consider recruiting local officials and community leaders to help promote participation and community buy-in for the survey effort or to conduct telephone interviews.

Outreach efforts including door hangers, utility bill stuffers, or mailers can be utilized to provide households with background information, describe why their response is important, and provide contact information for survey leaders or telephone interview participation.

Attempts to complete surveys should be started early to allow adequate time to reach the minimum 80% response rate and respond timely to the application deadline. Multiple outreach efforts including distribution of mailers and door hangers may be needed to provide households ample opportunity to

[2] Job Creation/Retention is a direct benefit activity

respond. In some instances, it will be necessary for an interviewer to physically go door- to-door to households that have not responded via phone interview to maximize participation.

Surveys may be conducted door-to-door, by telephone, through a mailed questionnaire, or a combination. Consider the method that will yield the best response rate while affording an opportunity to respond to all potential beneficiaries.

Instructions for completing the survey questionnaires are in the appendix.

Step 5: Creating the Survey List

The Survey List is a comprehensive list of the addresses of all the households/units that will benefit from the proposed project. This list should be based on an identification of all households in the service area. For a project having a city-wide benefit, the comprehensive list should be based on a list such as tax rolls, water meters, etc. [3]

The list must consist of the following information from each of the eligible Survey Questionnaires. From each Survey Questionnaire, enter the following:

- street address
- Survey Questionnaire number
- response type ("response," "non-response," or "vacant")
- gender data (total number of persons of each gender)
- income category data
- race and ethnicity data
- substitution data (if applicable)
- survey pool – (indicate whether it is included within the pool of Survey Questionnaires used to calculate the final beneficiary numbers, if using random sampling)
- respondent's phone number (if using telephone survey method)

The list must first be grouped by street name, and then each group with the same street name must then be sorted by numerical order by street number

Surveys consisting of 100% of benefitting households can proceed to Step 9.

Step 6: Calculate the Required Sample Size

For completed surveys consisting of 200 or more Survey Questionnaires, an applicant must calculate the required sample size using the "Sample Size Calculator and Random Number Generator (SSC/RNG)" located on the GLO website.

Under the "SAMPLE SIZE CALCULATOR," enter the total number of households/families that were surveyed (excluding all vacancies) in the field labeled "Surveyed Families", Cell K10 of the calculation spreadsheet. The form will also require the Margin of Error (MoE) in cell H10 of the spreadsheet. To gather this information, please see HUD CPD-Notice 1902 as well as the LMISD data spreadsheet:

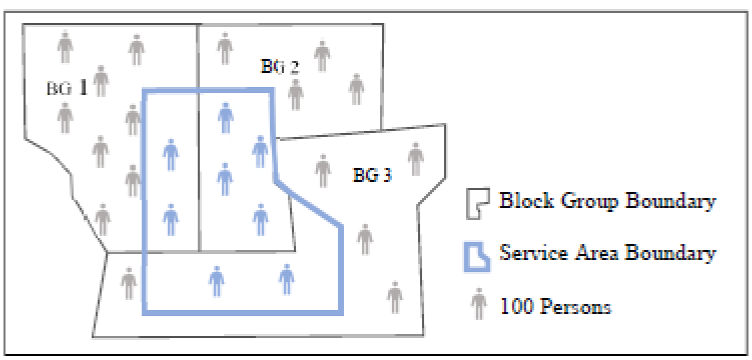
[3] Proposed projects with a city-wide benefit should ensure that all households are identified. Failure to include all benefitting households on the comprehensive list may result in disqualification of the survey and the correlative application

This Notice provides the following guidelines:

1. A local income survey's sample size shall be determined using not less than a 90 percent confidence interval, and
2. The maximum allowable MoE of the local survey shall be the lesser of 10 percent or the MoE of the HUD-provided data for the equivalent geography. For example, if HUD's data indicate an 8 percent MoE, the local survey will be required to have an MoE of 8 percent or less. If HUD's data indicate a 12 percent MoE, the local income survey would be required to have an MoE of 10 percent or less. If there is not an equivalent geography in the LMISD, the maximum MoE of the local survey shall be no more than 10 percent.

When service areas are compiled from multiple geographies, each geography will have a distinct MoE. In such cases, when determining the "equivalent geography's MoE" in item 2 of the policy above, use the single geography containing the largest number of residents of the activity's service area. For example, in Figure 4 below, the grantee has determined a service area for an activity that overlaps with three block groups. Block group 2 has 400 residents living in the service area, while block groups 1 and 3 each only have 200 residents living in the service area. Therefore, the MoE of the LMISD for block group 2 would be used to represent the service area. In this example, the maximum MoE allowable in a local income survey would be the lesser of 10 percent or the MoE of block group 2.

Figure 4: Choosing an MOE from Multiple Block Groups



The required size of the sample will appear in the box labeled "Sample size needed."

In the following example, the applicant entered in the number of homes within the proposed service area, which totaled 300. Also, the block group in which the surveys will occur in resulted in an MoE of 8%. The "SAMPLE SIZE CALCULATOR" then calculated the required "Sample size needed," which totaled 79.

SAMPLE SIZE CALCULATOR

Confidence Level	Margin of Error(MOE)	Surveyed Familes	Sample Size Needed
90%	8%	300	79

Currently, all GLO-CDR programs requrie sample size based on 90% confidence level and a Margin of Error (MOE) associated with the Census Tract and Block in which the surveys will occur. More information can be found on the GLO-CDR website.

Step 7: Selecting Samples Using the Sample Size Calculator / Random Number Generator

Once you have calculated the sample size needed using the "SAMPLE SIZE CALCULATOR," an applicant must then utilize the "RANDOM NUMBER GENERATOR" to randomly identify which surveys must be pulled to calculate the final survey tabulation.

Under the "RANDOM NUMBER GENERATOR," enter the number (or higher, see note below) provided in the "Sample size needed" field (that was calculated above) into the field labeled "Sample Size." Then enter the total number of households/families that were surveyed in the field labeled "Surveyed Families."

NOTE: When entering the number into the "Sample size" field, it is strongly recommended to enter a number that is slightly larger than the "Sample size needed" number that was provided in the "SAMPLE SIZE CALCULATOR." This will allow an applicant to have extra Survey Questionnaires to substitute if one of the Survey Questionnaires identified is a non-response (substitution and nonresponses are addressed in Step 7).

In the example below, the applicant entered in the "Sample Size" field a number (95) that was larger than the number calculated using the "SAMPLE SIZE CALCULATOR," which was 79. Then the applicant entered in the total number of households/families that was surveyed, which was 300.

The field below the generator will populate with random numbers that correlate with a particular Survey Questionnaire's number. The questionnaires must be placed in the order generated. The Subrecipient should start in column 1 of the chart and move down the list to obtain the required survey responses. For example, according to the numbers generated below the Survey Questionnaires would be placed in order beginning with 174, then proceed to 167, then 263, and so forth. While this is a list of 95 numbers, the applicant will use the first 79 eligible Survey Questionnaires that were actual responses (as 79 was the required sample size calculated above).

Start with Column 1 below, and move down the list to obtain the required responses.

174	280	0	0	0	0	0	0	0	0	0	0
167	29	0	0	0	0	0	0	0	0	0	0
263	95	0	0	0	0	0	0	0	0	0	0
292	155	0	0	0	0	0	0	0	0	0	0
101	55	0	0	0	0	0	0	0	0	0	0
118	15	0	0	0	0	0	0	0	0	0	0
202	249	0	0	0	0	0	0	0	0	0	0
69	192	0	0	0	0	0	0	0	0	0	0
9	141	0	0	0	0	0	0	0	0	0	0
26	201	0	0	0	0	0	0	0	0	0	0
163	294	0	0	0	0	0	0	0	0	0	0
56	196	0	0	0	0	0	0	0	0	0	0
243	123	0	0	0	0	0	0	0	0	0	0
20	18	0	0	0	0	0	0	0	0	0	0
54	33	0	0	0	0	0	0	0	0	0	0
87	190	0	0	0	0	0	0	0	0	0	0
107	187	0	0	0	0	0	0	0	0	0	0
28	75	0	0	0	0	0	0	0	0	0	0
252	262	0	0	0	0	0	0	0	0	0	0
100	276	0	0	0	0	0	0	0	0	0	0
41	255	0	0	0	0	0	0	0	0	0	0
11	275	0	0	0	0	0	0	0	0	0	0
184	177	0	0	0	0	0	0	0	0	0	0
224	228	0	0	0	0	0	0	0	0	0	0
256	266	0	0	0	0	0	0	0	0	0	0
145	287	0	0	0	0	0	0	0	0	0	0
37	73	0	0	0	0	0	0	0	0	0	0
230	261	0	0	0	0	0	0	0	0	0	0
76	299	0	0	0	0	0	0	0	0	0	0
89	240	0	0	0	0	0	0	0	0	0	0
241	143	0	0	0	0	0	0	0	0	0	0
205	191	0	0	0	0	0	0	0	0	0	0
265	144	0	0	0	0	0	0	0	0	0	0
200	5	0	0	0	0	0	0	0	0	0	0
199	35	0	0	0	0	0	0	0	0	0	0
161	162	0	0	0	0	0	0	0	0	0	0
237	31	0	0	0	0	0	0	0	0	0	0
189	25	0	0	0	0	0	0	0	0	0	0
129	149	0	0	0	0	0	0	0	0	0	0
30	108	0	0	0	0	0	0	0	0	0	0
285	102	0	0	0	0	0	0	0	0	0	0
279	217	0	0	0	0	0	0	0	0	0	0
245	104	0	0	0	0	0	0	0	0	0	0
147	82	0	0	0	0	0	0	0	0	0	0
159	48	0	0	0	0	0	0	0	0	0	0
1	111	0	0	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0	0	0
113	0	0	0	0	0	0	0	0	0	0	0
127	0	0	0	0	0	0	0	0	0	0	0
280	0	0	0	0	0	0	0	0	0	0	0

NOTE: Do not forget to enter the applicant's name into the field provided and to also print the page once generated, as it is required to be submitted with the survey. These are randomly generated and if it is not printed and lost, a new version will have to be calculated and used in its place. Additionally, the "Texas GLO" watermark must also appear on the printed hardcopy. If the watermark does not appear on the printed hardcopy, go to your browser's "Page Setup" and click on "Print Background Colors and Images" to resolve the issue.

Step 8: Conducting Substitutions

Once an applicant has pulled the individual Survey Questionnaires and placed them in the order as indicated in the generator, an applicant may encounter Survey Questionnaires that are marked as nonresponses (which include households/families that could not be reached after two attempts, or they simply refused to divulge their income information). These non-responses must be replaced with existing Survey Questionnaires that were identified in the pool created by the number generator (hence the increase in sample size over what was required).

In our example, 300 households are being surveyed, and the required sample size was 79, yet the applicant generated 95 numbers. This will provide the applicant with 16 extra Survey Questionnaires that could be utilized as a substitution. The first possible replacement Survey Questionnaire is 240, the 80th generated number. If, for example, the first Survey Questionnaire 174 was a non-response, it would be replaced with 240. If 240 happens to be a non-response, as well, then the applicant would continue onto the next Survey Questionnaire until a response is available. Substitutions may only be made for non-responses.

NOTE: If a substitution is not available, then the non-response must be left in the pool and will be counted as a non-LMI beneficiary when the final numbers are entered in the Survey Tabulation Form (see Step 8).

Step 9: Instructions for the Survey Tabulation Form

- Applicant: Type the name of the applicant into the space provided.
- County: Select the appropriate county from the drop-down menu. This will automatically populate the “Region” field.
- Survey Area Description: a brief description of the area surveyed (e.g., Main Street, Northwest area of town).
- Survey Start and End Dates: Enter the dates the first and last survey questionnaires were completed in the respective field.
- P1 Census Population: For CITYWIDE or CDP surveys only. Enter the P1 population as identified on the most recent decennial Census.
- Questionnaire Year(s): Enter the year(s) of the survey questionnaires used to compile the survey (e.g., a survey is conducted using the 2022 survey questionnaire). However, after the 2022 questionnaire is released, if the project scale is increased and new households are added to the target area, the Questionnaire Year(s) would be “2022 and 2023”.
- # of Households Benefitting: Enter the total number of households/families that were identified to receive benefit from a project activity (as determined in Step 1), excluding all vacancies.
- Required Sample Size: For a survey consisting of 100% of benefitting households, enter the number into the Number of Households Receiving Project Benefits field. For a survey that was randomly sampled, enter the required “sample size needed” as calculated using the “SAMPLE SIZE CALCULATOR.”
- # of Households Contacted: For a survey consisting of 100% of benefitting households, enter the number entered into the Number of Households Receiving Project Benefits field. For a survey that was randomly sampled, enter the required “sample size needed” as calculated using the “SAMPLE SIZE CALCULATOR.” The Number of Households Contacted cannot exceed the number entered in the Required Sample Size field.
- #of Households Responding to the Survey: Enter the number of households/families where a response to the survey was received. This number cannot exceed the number entered in the Required Sample Size field.
- Survey Response Rate: The response rate will be calculated on the numbers entered above. The rate must be equal to, or greater than, 80% for the survey to be eligible.

- Family Size: The family sizes are provided up to twelve. This field may not be modified.
- Number of Responses (Households): This field represents the number of responses received for each family size. It is auto filled based on responses to columns 8 and 9.
- Number of Low/Mod Responses: Enter in the total number of LMI Survey Questionnaire responses for each family size.
- Number of Non-Low/Mod Responses: Enter the total number of non-LMI Survey Questionnaire responses for each family size.
- Number of Low/Mod Persons: This field is auto filled and provides the number of LMI persons for each family size by multiplying the family size (column 6) by the number of LMI Survey Questionnaire responses (column 8).
- Number of Non-Low/Mod Persons: This field is auto filled and provides the number of non-LMI persons for each family size by multiplying the family size (column 6) by the number of non-LMI Survey Questionnaire responses (column 9).
- Totals for columns 7 through 11 are auto filled along the "Total" row located at the bottom of each column. Fields 12 through 18 are auto filled based on previous responses in the tabulation form.
- Total Persons Surveyed
- Average Family Size
- Households Not Surveyed
- Total Non-Low/Mod (Including Non-Responses from Sample)
- Total Beneficiaries
- Total Low/Mod Beneficiaries
- LMI Households (Based on Sample)
- Low/Mod Percentage (Based on Sample)
- Total Vacancies: This number must be provided manually. While vacancies are not included in the survey list, they must still be identified. Enter the total number of Survey Questionnaire(s) indicating that a household was vacant.

Income Category Data

Income category data for the survey must be provided for the survey as a whole. If the survey is randomly sampled, the category income data from the randomly identified Survey Questionnaires can be inferred on to the survey as a whole.

- HH - 80% County MFI - Enter the number of households claiming they earned more than 50% but not more than 80% of the County Median Family Income (CMFI).
- HH - 50% County MFI - Enter the number of households claiming they earned more than 30%, but not more than 50% of the CMFI.
- HH - 30% County MFI - Enter the number of households claiming they didn't earn more than 30% of the CMFI.
- Persons - 80% County MFI - Enter the number of persons claiming they earned more than 50% but not more than 80% of the CMFI.
- Persons - 50% County MFI - Enter the number of persons claiming they earned more than 30% but not more than 50% of the CMFI.
- Persons - 30% County MFI - Enter the number of persons claiming they didn't earn more than 30% of the CMFI.

The chief local elected official for the applicant must review and sign the form. The person signing the Survey Tabulation Form may be contacted by GLO staff concerning the results of our survey verification. Please include the official's Title, phone number (include area code), and address (include address, city, and zip code). Also, enter the date that the Survey Tabulation Form was signed.

Step 10: Sorting Instructions for Completion and Submittal of the Survey

For 100% surveys, the documents must be submitted in the following order:

1. Survey Tabulation Form;
2. Survey List;
3. Survey Questionnaires (these Survey Questionnaires must be submitted in the same order as indicated on the survey list.);
4. Survey Questionnaires of Vacant Households/Units and Non-Responsive Households.

For random ONLY surveys, the documents must be submitted in the following order:

1. Survey Tabulation Form;
2. Survey List;
3. Sample Size Calculator/Random Number Generator;
4. Sample Pool Survey Questionnaires (these Survey Questionnaires must be submitted in the same order as indicated in the number generator and should only include those Survey Questionnaires counted in the pool, not questionnaires that were replaced);
5. Replaced Survey Questionnaires (if applicable) (these are the non-response Survey Questionnaires that were replaced by responding Survey Questionnaires);
6. Non-sampled Survey Questionnaires (if applicable) (if random sampling was required, place all of the Survey Questionnaires that were not in the sample pool in this section);
7. Survey Questionnaires of Vacant Households/Units and Non-Responsive Households.

Step 11: Submit Completed Survey prior to or with Application for Funding.

NOTE: Survey “approval” prior to application submittal only “approves” the eligibility of the survey, not the proposed project nor the appropriateness of the beneficiaries for the proposed project.

9. Appendix

9.1 Definition of Terminologies

CDBG Regulatory Definitions of *Family, Household,* and *Income*

1. Pursuant to 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. A single person, who may be an elderly person, displaced person, nearly elderly person, or any other single person; or
   b. 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.
2. Pursuant to 24 CFR 570.3, household means all persons who occupy a housing unit. A household may consist of persons living together or any other group of related or unrelated persons who share living arrangements, regardless of actual or perceived sexual orientation, gender identity, or marital status.
3. Pursuant to 24 CFR Part 5 and 24 CFR 570.3, low-income person refers to member of a family that has an income equal to or less than the Section 8 very low-income limit established by HUD. Unrelated individuals shall be considered as one-person families for this purpose. (The Section 8 very low-income limit is income that does not exceed 50 percent of the median income for the area, as adjusted by HUD.) Unrelated individuals shall be considered as one-person families for this purpose.
4. Moderate-income person means a member of a family that has an income equal to or less than the Section 8 low-income limit and greater than the Section 8 very low-income limit, established by HUD. Unrelated individuals shall be considered as one-person families for this purpose.

9.2 Terms Used in Survey Research

1. Respondent refers to the person who is responding to the questionnaire or interview.
2. Rate of response is expressed as a percent; it is the number of households participating in a survey (number of responses) divided by the number of households in the sample.
3. Population refers to the group whose characteristics you seek to estimate.
4. Sample refers to a portion of the population under study. Samples are used to draw inferences about the population.
5. Sampling is the process of selecting a group of respondents from the population.
6. Simple random sampling is a type of probability selection process in which the units composing a population are assigned numbers and a set of random numbers is then generated, and the units having those numbers are selected to make up the sample.
7. Representativeness refers to the quality of a sample having the same distribution of characteristics as the population from which it is selected.

9.3 Forms and Resources

GLO's methodology will use the following forms and resources which that are located on the GLO website:

- Survey Questionnaire-Standard
- Survey Questionnaire-80% Only
- Survey Questionnaire-Standard- Espanol
- Survey Questionnaire-80% Only-Espanol
- Survey Questionnaire-Standard with waiver
- Survey Questionnaire-80% Only with waiver
- Survey Questionnaire-Standard- Espanol with waiver
- Survey Questionnaire-80% Only-Espanol with waiver
- Survey Sample Size and Random Number Generator
- Survey Tabulation Form
- Race and Ethnicity/Gender Calculator
- LMISD
- LMISD with waiver

9.4 Appendix: Instructions for Completing a Survey Questionnaire

All entries should be complete and legible.

Interviewer's Name: Enter the name of the individual that is interviewing the household with the Survey Questionnaire.

Place: Enter the name of the locality or area (hint: it is easier to enter this information prior to making copies).

County Name: From the drop-down box in the digital copy of the Survey Questionnaire (and before printing), select the appropriate county in which the survey will be completed.

Region: This field is auto filled when the appropriate county is selected in which the Survey Questionnaire will be completed.

Respondent's Information: Enter the following for each household that is surveyed:

- The street name and house/unit number (a post office box, or drawer, is not acceptable).
- The zip code in which the household is located.
- The respondent's telephone number (if there is no telephone in the household, or if the respondent will not divulge, leave the field blank).

Contact Attempts: Include the date(s) and time(s) of the contact attempt(s) and circle AM or PM for the time of day. Two contact attempts (if initial attempt fails) must be made to satisfy the one hundred percent (100%) effort requirement for door-to-door surveys. At least four attempts for telephone surveys. Indicate (by circling) whether each survey questionnaire is a:

- Response;
- Non-Response; or
- Vacancy.

Question 1 – Including yourself, how many people usually live in this unit? Enter the number of persons, including the respondent, that usually lives in the household.

Question 2 – Including yourself, how many people in your family usually live in this unit? Enter the number of family members living here, including babies, persons who usually live here but are temporarily away, relatives, lodgers/boarders, and all other persons. Do not include persons away in the Armed Forces, persons with a home elsewhere but who stay here most of the week while working, or any person staying or visiting who has a usual home elsewhere.

Question 3 – Do any other families live in this unit? Answer by circling "Yes" or "No." If your answer for Question 1 is greater than your answer for Question 2, then more than one family lives in this unit and the answer to Question 3 should be "Yes." If so, a separate Survey Questionnaire for each family that lives in a household should be completed.

Question 4 – Family Size: Enter the number of persons of the family living in the unit for whom the Survey Questionnaire is being completed. This number should be the same as the answer to Question 2 (note: if the Family Size is greater than twelve persons, then enter the actual number of persons in the family and base the family's answer on the income limit listed for a family size of twelve persons).

Question 4 – Males: Enter the number of males in the family.

Question 4 – Females: Enter the number of females in the family.

Question 4 – Median Income: This field is auto-filled when the appropriate county is selected in which the Survey Questionnaire will be completed.

Section 8 Income Limits: This section is auto filled when the appropriate county is selected in which the Survey Questionnaire will be completed. The family must include all income from all sources and circle the income category that best represents the family's yearly income based on the number provided in the appropriate Family Size field (the income categories are based on annual earnings, and this can either be based on the previous year's total earnings or the family's current monthly/weekly income calculated on an annual basis).

Race (and Ethnicity): An applicant for CDBG-DR or CDBG-MIT funds must provide race/ethnicity information of project activity beneficiaries. This section will assist applicants in compiling that information. In lieu of requesting this information via the Survey Questionnaire, an applicant may use the race/ethnicity data contained in Table DP05 of the most current, 5-year estimate dataset available of the America Community Survey (ACS). Utilizing ACS's race/ethnicity data for the census geographic area, in combination with the "Race/Ethnicity Calculator" (located on), an applicant can calculate the race and ethnic makeup of activity of project beneficiaries (without directly inquiring directly from surveyed households) by inferring the numbers onto the surveyed population.

Race (and Ethnicity) Definitions: For each, individual family, enter the following information (if opting to collect race/ethnicity data via the Survey Questionnaire) based on the following definitions.

# of Hispanic: Enter the number of person(s) of each race that identify as Hispanic. This can include persons of Cuban, Mexican, Puerto Rican, South/Central American, or other Spanish culture or origin, regardless of race.

# of Non-Hispanic: Enter the number of person(s) in each race that identify as Non-Hispanic. This includes person that are not of Cuban, Mexican, Puerto Rican, South/Central American, or other Spanish culture or origin, regardless of race.

White: Enter the number of person(s) in the family/household that identify as White.

Black/African American: Enter the number of person(s) in the family/household that identify as Black or African American. Black/African American and White: Enter the number of person(s) in the family/household that identify as Black/African American and White.

Asian: Enter the number of person(s) in the family/household that identify as Asian.
Asian and White: Enter the number of person(s) in the family/household that identify as Asian and White.

Native Hawaiian/Other Pacific Islander: Enter the number of person(s) in the family/household that identify as a Native Hawaiian or a Pacific Islander.
American Indian/Alaskan Native: Enter the number of person(s) in the family/household that identify as an American Indian or an Alaskan Native.

American Indian/Alaskan Native and Black/African American: Enter the number of person(s) in the family/household that identify as an American Indian/Alaskan Native and Black/African American.

American Indian/Alaskan Native and White: Enter the number of person(s) in the family/household that identify as an American Indian/Alaskan Native and White.

Other Multi-Racial: Enter the number of person(s) in the family/household that identify as a race that is not included in any of the above.

Questionnaire Number: Enter the Survey Questionnaire's identification number in this space. Each Survey Questionnaire must have its own, unique identification number. The highest number assigned (which can be done randomly) must not exceed the total number of eligible Survey Questionnaires in a completed survey. All vacancies must be removed from the Survey List and cannot be included when assigning Questionnaire Numbers.

Substituted In For: If the Survey Questionnaire is part of survey that will be randomly sampled, enter the Survey Questionnaire identification number that this questionnaire is replacing in the random sample (Steps 5-7) will explain the random sample process and if it is applicable to a survey*)*.

Substituted Out For: If the Survey Questionnaire is part of survey that will be randomly sampled, enter the Survey Questionnaire identification number that this questionnaire is being replaced by in the random sample.

9.5 HUD Resources:

- CPD Notice 24-04, Low- and Moderate-Income Summary Data Updates
- CPD Notice 14-013, Guidelines for Conducting Income Surveys to Determine the Percentage of Low- and Moderate-Income (LMI) Persons in the Service Area of a Community Development Block Grant (CDBG)-Funded Activity