Using Census Data and Surveys

The first step is to determine the service area of the proposed project:

The determination of the area served by an activity is critical to this method. The inclusion or exclusion of a particular portion of a community's jurisdiction can make the difference between whether the percentage of L/M income residents in the service area is high enough to qualify under the L/M income benefit national objective.

The area that will be served by an activity need not be coterminous with census tracts, block groups, or other officially recognized boundaries. It is critical, however, that the service area be the **entire area** served by the activity.

For example, even though a predominantly L/M income neighborhood may be one of several neighborhoods served by an activity (for example, a water main replacement) the percentage of L/M income persons in the total area served by the activity is considered for this purpose.

However, the service area boundaries of CDBG-funded activities frequently do not coincide with census or other official geographic boundaries. This is especially true in smaller communities and rural areas, where low population densities mean that block groups or census tracts cover large areas. Scenarios commonly faced by applicants include:
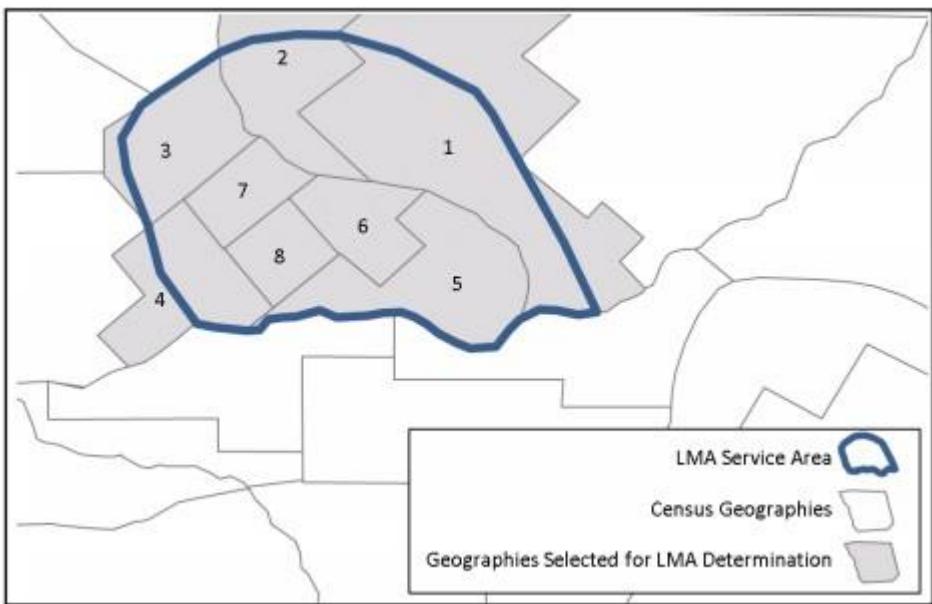
- The service area comprises only a small portion of the unit of general local government, or of a block group. In such situations, information on the percentage of L/M income persons in the unit of government or the block group/census tract is not useful, because the service area residents make up a small fraction of the total, and their economic characteristics may not mirror those of the larger area. A survey of the service area residents may be the most appropriate way to determine whether the service area qualifies under the L/M income area benefit criterion. (See Surveys below) Examples of such activities include: extending water lines to serve a small, unincorporated rural settlement in a county; reconstruction of a sewer line serving one subdivision in a city of 4,000, where the entire city is one census tract.

- The service area includes all or part of several units of general local government and may contain both incorporated and unincorporated areas. HUD's LMISD may be usable for only a portion of the service area; therefore, the State and its grant recipients may need supplementary survey data for the other portions of the service area. It may be necessary to survey a large area to determine the percentage of service area residents who are LMI. Examples of activities include: (1) construction of a rural water system which serves more than one incorporated city plus portions of the surrounding unincorporated area of two counties in which the cities are located; (2) construction of a new fire station in a city where the municipal fire department provides, through contract, fire protection service for two adjoining townships (one of which is in a different county). The service area may be a sparsely populated rural area.

To count project beneficiaries and document LMI percentage based on data from the Census, use the Low-to-Moderate-Income Summary Data (LMISD) spreadsheets from the GLO-CDR web site. This Excel file contains population and income data for the State of Texas down to the Block Group level.

To obtain a Census map of a specific area, visit the U.S. Census Bureau web site (https://www.census.gov/data.html). LMISD spreadsheets and other the beneficiary documentation tools can be found on the GLO-CDR website.

GLO-CDR will only allow the use of the LMISD data to qualify an activity and to document the activity beneficiaries under the following conditions:

1. The project activity will benefit a significant number of the persons within a census geographic area. The census geographic area could be a county, place, census tract, or block group.

If the geographies provided do not adequately represent the service area, grantees may consider conducting a survey to determine LMA compliance or reconsider the National Objective and activity.

When using multiple Census geographies in the determination of LMA compliance of a service area, grantees are reminded that percentages shall not be averaged across multiple geographies.

The proper calculation is as follows:

LMI % = (LMI Persons Geography A + LMI Persons Geography B + LMI Persons Geography C…) ÷ (LMI Universe Geography A + LMI Universe Geography B + LMI Universe Geography C…)

2. If only LMISD data is used to document the beneficiaries of an application activity, the low- and moderate-income benefit percentage must be at least 51% (not 50.99%) for a single census geographic area or for combinations of two or more census geographic areas.
3. The service area includes all or part of several units of general local government; the service area might contain both incorporated and unincorporated areas. The HUD-provided data may be usable for a portion of the service area, but may need to be supplemented by survey data for other portions of the service area.

   Example: Construction of a rural water system which serves nine small incorporated towns plus portions of the surrounding unincorporated area of the two counties where the towns are located.

If an application activity does not benefit an entire census geographic area, or a significant number of the persons within a census geographic area, then the applicant must use another method to document the beneficiaries. The applicant must conduct a local TxCDBG survey to document all project beneficiaries in that census geographic area and the low- and moderate-income benefit percentage for the activity.

The survey data may be used as a *supplement* to the LMISD data for other census geographic areas to more accurately reflect the area's low- and moderate-income benefit percentage. **No additional data may be used to "*substitute*" or alter the LMISD data for a specific geography** such as previously acceptable methods of substituting data (prison, nursing home, etc.). Incarcerated populations are not considered eligible beneficiaries of TxCDBG projects, and may not be added to the total beneficiary information through surveys or any other method.

Navigating the LMISD Spreadsheets

The following are the two separate spreadsheets that compose the LMISD data (along with the information that each contains):

1. ALL BLOCK GROUPS STATEWIDE – data for every block group in the state
    a. "GEOID" - identifies the concatenation of State, County, Tract, and Block Group FIPS codes
    b. "geoname" – identifies each block group by census tract and county
    c. "stusab" – identifies the state abbreviation
    d. "countyname" – identifies the county
    e. "state" – identifies Texas
    f. "county" – identifies the county by numerical code
    g. "tract" – identifies the census tract
    h. "blkgrp" – identifies the block group
    i. "low" – identifies the count of Low income persons.
    j. "lowmod" – number of LMI persons within the block group
    k. "LMMI" - the count of all persons below the 120% income level
    l. "lowmoduniv" – total number of persons within the block group
    m. "lowmod_pct" – percentage of LMI persons in the block group
2. LOCAL UNITS OF GOVERNMENT (ALL) – data for all entities in the state
    a. "Group" – identifies type of entity (COUNTIES, COUSUB/MCD, PLACES)
    b. "geoname" – identifies the entity
    c. "Stusab" - identifies Texas
    d. "State" - identifies the state by numerical code
    e. "Place" – provides a place's identifying census number, if applicable
    f. "County" – provides a county's identifying census number, if applicable
    g. "Cousub" – provides a county subdivisions/CDP identifying census number, if applicable
    h. "low" - number of low-income persons within the block group
    i. "lowmod" – number of LMI persons within the block group
    j. "LMMI" - the count of all persons below the 120% income level
    k. "lowmoduniv" – total number of persons within the block group
    l. "lowmod_pct" – percentage of LMI persons in the block group

The "ALL BLOCK GROUPS STATEWIDE" data may be used to qualify a project that benefits a target area(s) or used to recreate entity-wide LMI data that is broken out by block group for an entity-wide project.

The "LOCAL UNITS OF GOVERNMENT (ALL)" data may be used to qualify a project with an entity-wide project.

Applicants using LMISD data to document activity beneficiaries must submit the following information with the application:

- A copy of the data from the LMISD spreadsheet(s) for the applicant and/or the TxCDBG-completed cover sheet, which includes low-and moderate-income benefit percentages for each census geographic area.

- For target area activities that do not benefit the entire city or county, a census map that contains the numbers for each census geographic area, the boundaries of each census geographic area, the locations of the project activities within each census geographic area, and the service area for each project receiving benefit. Applicant must clearly define service area on a project/census map.

- TxCDBG always, reserves the right to require an income survey for the actual service area if concerns about eligibility are raised, so applicants are advised to seek technical assistance from the program prior to application deadlines to verify projects

- The Census information and maps are available from various state agencies and from various websites.

When trying to obtain information or maps, first check with your local Council of Governments, as most have these materials for their respective regions. You may also contact GLO-CDR staff for information concerning the availability of Census information. Census maps are available on the Census Bureau website at https://www.census.gov/data.html).