

Income Survey Justification Letter Minimum Standards Requirements

These Minimum Standards outline the necessary information that must be included in any Income Survey Justification Letter submitted to the Office of Community and Rural Affairs as part of the request to conduct an income survey. The letter should effectively justify why the HUD data does not accurately reflect the income levels or capture the unique aspects of your community and service area. This Minimum Standards document is divided into two components: required and discretionary. Justification letters are evaluated in conjunction with LMI and MOE. Please note that submission of the elements listed below does not guarantee approval of the income survey request.

Required: The inclusion of these components is necessary in order to evaluate a letter of justification. The income survey request will not be considered or evaluated until the justification letter contains all the required components.

Discretionary: These components aid to formulate a compelling case for the individual community request. While not all data types listed may be relevant, it is recommended to include various types of pertinent data to provide the strongest justification for the income survey request. The certified grant administrator may also incorporate additional data points as needed.

Required for Justification Letter:

- The Letter must be written on the official letterhead of the town, city or county.
- The Letter must be signed by the current Chief Elected Official (CEO).
- The letter must be signed and dated within 6 weeks of submission of the request in the Grants Management System.
- The current low- to moderate income percentage (LMI %) must be stated in the narrative.
- The current margin of error (MOE) must be stated in the narrative.
- Information on the unit of geography to be surveyed.
- Specify whether the service area is a custom or a conforming area.
- The project type must be stated in the narrative—if no specific project identified, explain why the service area was selected.
- At a minimum the narrative must contain one discretionary data type from the options outlined below.

Required for Service Area Map:

- The service area map must be attached to the justification letter and clearly illustrate the service area. The map should include an overlay of the geographic boundaries or a side-by-side comparison of the service area and income survey area to demonstrate that this represents the "geography of best fit."

Discretionary Data Sources:

The following lists example data sources that can be used to demonstrate economic and population shifts. At least one of these must be included in the narrative of the justification letter.

- Economic Data: must be progressive data across the past 5 years (data may be based on the census tract or block group)
 - WARN notices.
 - Year(s) and number of jobs lost.
 - Percentage of population commuting outside of the community to work (include map from STATS Indiana).
 - Temporary Assistance for Needy Families (TANF) data.
 - Job creation statistics in specific sectors or industries.
 - Upward trends of elderly population.
 - SNAP enrollment increase.
 - Poverty data.
 - Unemployment rates over the past several years, sourced from the Bureau of Labor Statistics (BLS).
 - Availability and types of housing (affordable housing statistics, homelessness rates).
 - Information on local business openings and closures, including small business growth trends.
- Demographic Data:
 - Historical population growth or decline trends from the American Community Survey (ACS).
 - Migration patterns and statistics from local or state demographic reports.
 - Health insurance coverage rates, including uninsured populations.
- Statistical data- progressive data
 - Range of MOEs within service area from prior LMSID data.
 - LMI percentage from prior LMSID data.
 - Median incomes of geographic units.