

## OCRA Income Survey Policy – Validity Time

### **ORIGINAL POLICY\_10/15/2018:**

Income surveys are good for five (5) years from the date of the first survey contact (e.g. first mailer, first phone call, first house visit). For communities that use an income survey instead of U.S. Census data to qualify for CDBG funding, a letter of justification must be provided with the Proposal and/or Application which cites an economic reason for why the Census data does not accurately reflect incomes in the area.

While OCRA no longer requires that no more than six (6) months pass between the first survey contact and the collection of the final income survey, it is highly recommended that surveys are completed over as short of a time span as possible so as to allow communities to use the survey for the greatest amount of time over the five (5) year validity window. If more than 120 days passes between the collection of the first survey contact and the collection of the final income survey, then a letter of justification must also explain why the survey collection took longer than three months and why it should still be considered statistically accurate and valid despite the lengthier collection time. The survey collection period is considered complete once the final LMI percentage is calculated. At this time, no additional responses may be gathered and added to the sample. 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.

Those surveys started prior to the effective date of this policy will continue to follow the previous policy, which state that surveys must be completed and certified within nine (9) months from the start of the sample and are good for four (4) years from the date of the certification letter.

### **UPDATED POLICY\_03/02/2022:**

For communities that use an income survey instead of U.S. Census data to qualify for CDBG funding, a request to conduct an income survey must be submitted in OCRA's electronic grants management system (eGMS) along with a letter of justification which cites economic and/or demographic changes explaining why the Census data does not accurately reflect incomes in the area.

Income surveys are good for five (5) years from the date of the first survey contact (e.g. first mailer, first phone call, first house visit). The survey collection period is considered complete once the final LMI percentage is calculated. At this time, no additional responses may be gathered and added to the sample. It is highly recommended that income surveys should be completed over as short of a time span as possible to maximize communities' ability to use the survey for the greatest amount of time across the five (5) year validity window.

Once a request for approval to conduct an income survey has been submitted in eGMS, communities will receive a response from OCRA and/or Grant Services within 10 business days. This will be the standard response time for each step of the income survey approval process. Communities will have 90 days from the date they received approval to conduct an income survey to submit their final survey results for review and approval in eGMS. If more than 90 days passes between the approval to conduct an income survey and the submission of the final survey results in eGMS, then a letter of justification must also be submitted explaining why the survey collection took longer than three months and why it

should still be considered statistically accurate and valid despite the lengthier collection time. Communities who fail to meet this deadline and/or who do not submit the necessary letter of justification within a reasonable period of time, will be required to restart the income survey process.

Valid income surveys may be used for any project that matches the service area and the beneficiaries as the income survey.

Income surveys that were approved prior to the effective date of this policy will continue to follow the previous policy, which stated that income surveys are good for five (5) years from the date of the first survey contact and that if more than 120 days passed between the collection of the first survey contact and the collection of the final income survey, then a letter of justification must be submitted.

EFFECTIVE DATE: June 15, 2022