

OCRA Income Survey Policy – Validity Time

ORIGINAL POLICY (9.21.16):

Income surveys are good for four (4) years from the date of the certification letter. 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.

In order to serve our beneficiaries in a timely and accurate manner and expend funds in a timely manner, OCRA has established a policy of allowing no more than six (6) months between the first survey contact and the collection of the final income survey, with an additional three (3) months maximum to have the survey certified and returned to our offices, totaling a maximum of nine (9) months for the entire process.

If one believes they can make the case based upon large population numbers or other factors, an extension should be requested from OCRA prior to initiating a survey. In extreme cases, an extension may be granted due to unforeseen events during a survey in progress. In these cases, one should be able to show that a significant effort has been given to meet the six (6) month and nine (9) month timelines. Extensions should be submitted by the local unit of government in the form of a letter to the CDBG Program Manager. While all extensions will be reviewed, extensions are not guaranteed.

Those surveys in process prior to the announcement of this policy will not be held strictly to this timeline, however OCRA retains the right to determine what is considered reasonable based on respective situations extending past the overall nine (9) month limit, as it has prior to the policy. These surveys do not require a request for extension.

UPDATED POLICY (7.13.18):

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 the 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..

Effective Date: October 15, 2018