

Williamson County Income Survey Methodology and Procedures

I: PURPOSE

The purpose of this survey is to determine if the service area of a proposed activity meets the LMI Area Benefit national objectives criteria. The city in which the proposed project is located ("The City") will conduct an income survey utilizing the approved survey techniques/methodology as cited in HUD CPD Notice 14-013 and in compliance with HUD's regulatory requirements as specified in 24 CFR 570.208(a)(1)(vi) to ascertain that at least the percent level identified by HUD for Williamson County as an Exception Grantee of those residing in the project service area are Low-and Moderate-Income (LMI) persons. The target area for the survey will include residents in the proposed project area. The goal is to secure a survey sample that will yield acceptable levels of accuracy from all who will benefit.

All costs associated with the survey implementation will be the responsibility of The City.

CONFIDENTIALITY

All responses will be kept confidential as per State and local laws regarding privacy and obligations of confidentiality. The questionnaire will reflect the respondent's name, address, and income data as provided and corresponding household/family size. Each survey will be numbered and only that number will appear on tabulation data provided. If verification is required thereafter, tabulation data can be matched to the corresponding number. Before the survey is conducted, each household will be sent notification by The City citing the reason for the survey and stressing the importance of a response and confidentiality.

II: DEFINITIONS OF TERMININOLOGIES

The City will follow the CDBG Regulatory definitions of Family, Household, and Income based upon the entitlement terminologies pursuant to 24 CFR Part 5 and 24 CFR 570.3.

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 single person, who may be an elderly person, displaced person, nearly-elderly person, or any other single person; or
 - 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. The City will utilize the following grantee entitlement definition of income:
Adjusted gross income as defined for the purpose of reporting under Internal Revenue Service (IRS) Form 1040 for individual Federal annual income tax purposes.
- 4. 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.
- 5. 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.

Terms Used in the Survey Research

The City will utilize the following terms in the 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/families participating in a survey (number of responses) divided by the number of households/families 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.

III: DETERMINING THE SERVICE AREA OF A CDBG-FUNDED ACTIVITY

The service area is the entire area to be served by the CDBG funded activity. Williamson County will determine, with the assistance of The City, the service area of the proposed project. All service areas must be approved by Williamson County prior to surveys being conducted.

ENTITLEMENT PROGRAM

Factors to be considered in defining these service areas include:

1. Nature of the activity: In determining the boundaries of the area served by a facility, one must consider whether the facility is adequately equipped to meet the needs of the residents. For example, a park that is expected to serve an entire neighborhood cannot be too small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at a time. Conversely, a park that contains three ball fields or a ball field with grandstands that can accommodate hundreds of spectators cannot reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons commuting.
2. Location of the activity: Where an activity is located may affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. For example, a library cannot reasonably benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhoods as well as the one in which it is located. The grantee may even carry out activities that are outside its jurisdiction if this is done in accordance with 24 CFR 570.309.
3. Accessibility issues: If a geographic barrier such as a river or an interstate highway separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in the service area. Language barriers might also constitute an accessibility issue in some circumstances.

IV: PERFORMING LMI QUALIFICATION

Within the survey area, The City will capture the percentage of LMI residents by utilizing a combination of survey methods outlined in HUD's CPD notice 14-013. This will produce statistically reliable LMI data and be in compliance with CDBG Regulations 24 CFR 570.208(a)(1)(vi). The goal is to secure a survey sample that will yield acceptable levels of accuracy from all who will benefit in the project area.

1. The surveys will clearly document the intended survey methods used: Letter/Mail, Web-based, Telephone/Mobile and Door-to-door

2. All participants for the survey will be selected through a random sampling process, and replacements for non-respondents will also be selected through the same random sampling process. This process will be conducted by Williamson County.

Sample size for the targeted areas to survey will be selected through a random sampling process, and replacements for non-respondents will also be selected through the same random sampling process. Based on the total number of families in the service area, the sample size will be defined by the Sample Size Calculator, as noted in HUD's CPD Notice 14- 013.

Seasonal (or part-time) residents (e.g., migrant farmers who reside in manufactured homes) may not participate in an income survey if their benefit of a service or an activity is incidental. For example, the use of a library or senior center by seasonal residents would be considered an incidental benefit. Seasonal residents may participate in income surveys for CDBG-funded activities such as installation of sewer lines and sewage treatment plants, etc.

The American Community Survey (ACS) defines residency in terms of "current residence" - a unit is defined as the current residence of a household if the household is living in the unit for at least two months upon receipt of the survey, even if the household lives somewhere else for most of the year. In contrast, the long form uses a "usual residence" rule, i.e., the place where a person lives and sleeps most of the time. The differences in the definition of residence have consequences for vacancy and homeownership estimates.

V: A SUMMARY OF STEPS IN CONDUCTING LMI SURVEYS

The City will conduct all survey implementation under the direction of the Williamson County Community Development Block Group (CDBG) Office.

The City will implement a multiple options survey method which is designed to collect income and family size data needed to determine if the survey area qualifies. This ensures a concerted effort to capture all residents in the targeted area and decrease the burden placed on residents to respond to the survey. Consideration and appropriate accommodations will be given to the needs of residents with limited English proficiency as well as residents with visual, hearing, and/or speech impairments.

Step 1: Selecting the Type of Survey

The survey area residents will be offered several options to complete the survey. These options will be communicated via the survey announcement letter to be mailed out to each address within the survey area. The options include a mail questionnaire, a web-based/mobile survey link, and contact information to allow for a telephone or door-to-door interview.

Step 2: Develop the Questionnaire

The survey mail questionnaire will be on standard 12 point print and will generally follow the guidelines listed below:

The questions in the questionnaire will be short, simple, efficient and will avoid bias.

The correct income limits for the survey instrument will be provided by the Williamson County CDBG Office.

Questionnaire will be developed under the guidance of the Williamson County CDBG Office and must be approved prior to use.

Step 3: Select the Sample

The City will collaborate with the Williamson County CDBG Office to determine the project service area. A project service area must be approved by the Williamson County CDBG Office.

Sample size for the targeted areas to survey will be selected through a random sampling process, and replacements for non-respondents will also be selected through the same random sampling process. Based on the total number of families in the service area the sample size will be defined by the Sample Size Calculator, as noted in HUD's CPD Notice 14- 013.

The survey will ensure that families are added to replace refusals and that the entire service area is covered. Commercial sites, vacant lots, abandoned and vacant homes will be excluded from the sample. The survey will be disseminated without bias to ensure a concerted effort to capture all residents in the targeted area and decrease the burden placed on them to respond to the survey.

Step 4: Conduct the Survey

The City will be responsible for conducting the approved survey. All costs associated with the survey implementation will be the responsibility of The City.

The City will contact the residents of the service area with a notification letter informing people in advance of the survey implementation. The City will make multiple attempts (3 minimum) to establish contact and survey completion. Following a minimum of three attempts, a replacement household will be identified and contacted for survey purposes.

Step 5: Analyze the Results

The City will submit all documentation to the Williamson County CDBG Office for analysis and calculation.

Step 6: Document Retention

All original survey documents including but not limited to interview sheets, completed forms, tabulation sheets, memos, notes describing the survey implemented, residents' information and service area notes will be kept secure and archived by the Williamson County CDBG Office. The County will retain completed survey documents with care to observe the confidentiality requirements outlined in this instrument.

VI: PROCEDURES FOR CONDUCTING A METHODOLOGICALLY-SOUND SURVEY

Step 1: Survey Type

The City will implement an approved multiple options survey method which is designed to collect income and family size data needed to determine if the survey area qualifies. This ensures a concerted effort to capture all residents in the targeted area and decrease the burden placed on them to respond to the survey.

The residents of the identified survey area will be offered several options to complete the survey. These options will be communicated via the survey announcement letter to be mailed out to each address within the survey area. The options include a mail questionnaire, a web-based/mobile survey link, and contact information to allow for a telephone or door-to-door interview.

a) Mail (or Self-Administered) Questionnaires

The City will send out a mail survey accompanied by a letter of explanation with a self-addressed stamped envelope for return.

b) Face-to-Face (Door-to-Door) Interviews

Within the mail out survey letter, information will be provided to residents for the option to call and select a predefined date to take the interview face-to-face. The letter will also indicate dates in which door-to-door surveys will be conducted in the service area.

c) Web-based Survey

Within the mail out survey letter, information will be provided regarding the option to take the survey online.

d) Within the mail out survey letter, information will be provided to the resident for the option to call and take the survey by phone.

Step 2: Developing a Questionnaire

During the development of the survey questionnaire the following four basic areas will be examined:

- Determining the content, scope and purpose
- Choosing the most responsive form of collection
- Specific wording of questions as to collect accurate and useful information
- Determining the order of questions as to collect accurate and useful information

The City will ensure that all respondents be asked the same questions, in the same order, and their responses recorded exactly, without additions or deletions. Care will be taken to ensure the questions are written properly and the exact response of each respondent recorded as it is presented. When conducting face-to-face surveys, figures for each low- and moderate-income level and its corresponding family size will be presented.

CDBG regulations at 24 CFR 570.506(g)(2) for the Entitlement programs require submission of data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in or beneficiaries of CDBG programs. This information must be reported for each activity and should indicate the number persons benefiting by race, ethnicity, and female head of household.

The survey will contain the following racial categories: White, Black/African American, Asian, American Indian/Alaskan Native, and Native Hawaiian/Other Pacific Islander, American Indian/Alaskan Native & White, Asian & White, Black/African American & White, American Indian/ Alaskan Native & Black/African American, Other Multiracial; and the following ethnic categories: Hispanic, Latino, or not Hispanic or Latino. Respondents will be asked to provide this data.

Survey Number _____

Williamson County Income Survey
Cover Sheet

Name _____

Address _____

Telephone _____

Email (not required) _____

CONFIDENTIALITY: Please note that your name, address, telephone number, email address and responses will be kept confidential in accordance with applicable state and local laws regarding privacy and obligations of confidentiality.

Sample Questions

Question 1

How many families currently reside at this address? _____ (If more than one family, each family must complete a separate questionnaire since more than one family can be living in one household).

Question 2

How many persons are there in your family including yourself? _____ (If you are single with no dependents, write 1).

Question 3

Is the current, combined income of all family members residing at this address (including any related, dependent persons over 65 or working dependent children over 18) above or below the figure indicated below? ____ above ____ below

Insert appropriate HUD Program Income Limits
<https://www.huduser.gov/portal/datasets/il.html>

Question 4

Please, check the ethnic group to which you belong:

Hispanic or Latino ____ Not Hispanic or Latino ____

Please check the racial group to which you belong:

White ____

Black/African American ____

Asian ____

American Indian/Alaskan Native ____

Native Hawaiian/Other Pacific Islander ____

American Indian/Alaskan Native & White ____

Asian & White ____

Black/African American & White ____

American Indian/ Alaskan Native & Black/African American ____

Other Multi-racial ____

Step 3: Defining the Population and Selecting the Sample

Sample size for the approved service area to survey will be selected through a random sampling process, and replacements for non-respondents will also be selected through the same random sampling process. Based on the total number of families in the service area, the sample size will be defined by the Sample Size Calculator, as noted in HUD's CPD Notice 14-013.

The City will identify the number of families within the approved survey areas utilizing its municipality's indexes.

Utilizing The City's indexes to provide the best available source of household information, the sample size of the survey will be evaluated by the utilization of the Sample Size Calculator (SSC) developed by Creative Research Systems or another HUD approved method. This process will be conducted by the Williamson County CDBG Office.

Unavailable Persons and Other Non-responses

It is anticipated there will be some residents who will select not to participate. The goal is to minimize these by using the pre-survey announcement notice and by stressing confidentiality. The pre-survey letter will offer the resident the option of responding by mail, mobile/web, phone or face-to-face interview. A minimum of three attempts must be made prior to choosing a replacement. When choosing to get a response from replacements, random sampling process will be utilized. Understanding as a matter of policy non-respondents are classified as non-LMI persons. Non-response rates greater than 20 percent may affect the validity of the survey.

"Unreachable" individuals in the sampling will be replaced with the next family on the list in the order they were selected or by randomly selecting a point at which to start and proceed systematically.

Step 4: Conducting the Survey

The City will be responsible for conducting the approved survey in the manner outlined in this policy. All costs associated with the survey implementation will be the responsibility of The City. Any deviation from this policy must be approved by the Williamson County CDBG Office.

Publicity

The goal is to secure a survey sample that will yield acceptable levels of accuracy from all who will benefit in the project area. Before the survey is conducted, each household will be mailed a notification letter by The City citing the reason for the survey, a project description and benefits of the project. The notice will address how, when and why they will be contacted and stress the importance of confidentiality. The City may also consider utilizing the local newspaper, church or civic organizations, government website and/or email list serve, or neighborhood associations.

Interviewers

Interviewers will be selected by The City and do not have to be professional interviewers. Interviewers must be provided will all materials needed to conduct sound interviews.

Contact and Follow-up/The Interview

Initially the interviewer will make contact with the head of household or someone who is qualified to speak for the family. The survey will be conducted during a reasonable time when most residents can be reached (i.e. evenings, weekends) and interviewer(s) will be professional, dress appropriately and establish a rapport that facilitates the process of asking questions and securing answers. The interviewer will have copies of the pre-survey notice to present to the respondent and show appropriate identification to establish confidence and trustworthiness. The respondent's answers will be recorded neatly, accurately, and immediately as they are provided. To mitigate errors, interviewer will review information provided with respondent and thank them for their participation.

Step 5: Survey Analysis and Determination

All completed surveys and documentation will be submitted to the Williamson County CDBG Office for analysis. The Williamson County CDBG Office will review each survey to ensure that it is complete and that each question is answered only once and in a way that is clear and unambiguous. Questions or errors that are found will be referred to the interviewer for clarification. It also may be desirable to call the respondent, if necessary, to clarify incomplete or ambiguous responses. If a question or an error cannot be resolved, a replacement should be added and the new respondent contacted. Note that editing is an ongoing process due to possible errors that need correction during data tabulation and analysis.

Once all data is collected, the responses will be tabulated as outlined in CPD Notice 14-013. The Williamson County CDBG Office will tabulate and analyze the data collected.

The Williamson County CDBG Office will complete the analysis of data collected to determine the percent low-mod of the identified service area of the proposed project. Williamson County is an Exception Grantee. The calculated percent low-mod will be compared to the most up-to-date "area-basis exception grantee" percentage for Williamson County.

Since the purpose of the CDBG program is to principally benefit LMI persons, as a matter of policy, rounding is NOT to be used in determining whether an area meets the 51 percent threshold for the national objective compliance for an area benefit activity. For Williamson County, rounding is not to be used in determining the percent low to moderate that will be compared to the most up-to-date "area-basis exception grantee" percentage for Williamson County.

Tabulation Low-Moderate Income Worksheet

1. Enter the estimated total number of families in the service area _____
2. Enter the total number of families interviewed _____
3. Enter the total number of persons in the families interviewed _____
4. Enter the total number of persons in the families interviewed who
are low- and moderate-income persons _____
5. Divide Line 4 by Line 3 _____
6. Multiply Line 5 by 100. This is the percentage of LMI persons in the service area. _____

Step 6: Documenting the Results

All documentation will be maintained by the Williamson County CDBG Office. Documents to be maintained include:

- Completed surveys
- Cover sheets stored/saved separate from completed surveys as to maintain confidentiality
- Families sampled
- Backup copies of data and any spreadsheets or tables containing raw data

Sample Letters

Date

Resident Name

Address

City, State, Zip

Dear Mr. Name:

The City of *(insert city)* has been awarded *(insert dollar amount)* through the Williamson County Community Development Block Grant (CDBG) program. The funding is to be utilized for *(insert project description)*.

To qualify for these funds, the program requires information of residents benefitting from these improvements. The City of *(insert city)* plans to initiate and conduct house to house income surveys to document the current income of the residents of the project service area.

Your response and participation in the survey process is critical in finalizing the funding process. All responses will be kept confidential and used solely for securing these grant funds.

The survey will be sent to you within the next 30 days. If you have any questions regarding this survey please call the *(insert contact information)*.

Sincerely,

(insert name)

Date

Resident Name

Address

City, State, Zip

Dear Mr. Name:

The City of *(insert city)* has been awarded *(insert dollar amount)* through the Williamson County Community Development Block Grant (CDBG) program. The funding is to be utilized for *(insert project description)*.

To qualify for these funds, the program requires information of residents benefitting from these improvements. The City of *(insert city)* plans to initiate and conduct house to house income surveys to document the current income of the residents of the project service area.

Your response and participation in the survey process is critical in finalizing the funding process. All responses will be kept confidential and used solely for securing these grant funds.

Please complete the attached survey and return it to *(insert return address)*. A self-addressed stamped envelope is included for your convenience.

For your convenience the survey can also be taken online at the following:

(insert survey link)

If you have any questions regarding this survey or to set up an appointment for the survey to be taken either by phone or face to face, please call *(insert contact info)*

Sincerely,

(insert name)