

# Determination of Household Income

January 10, 1992

MEMORANDUM FOR: Michael A. Smerconish, Regional Administrator/  
Regional Housing Commissioner, 3S

FROM: Anna Kondratas, Assistant Secretary  
Community Planning and Development, C

## **SUBJECT: Determination of Household Income Community Development Block Grant (CDBG) Program**

This is in response to your November 8, 1991, memorandum requesting clarification of some of the household and income definitions at 24 CFR 570.3 of the Community Development Block Grant (CDBG) regulations. You also requested guidance on how often surveys should be repeated.

Your request for clarification appears to reflect the understanding that, because the CDBG regulation defines "household" to include all persons living in the same housing unit, this means that any income received by anyone in the household must be counted in determining whether the household qualifies as low or moderate income. Since the CDBG regulations do not define what kinds of income are to be included or excluded for this purpose, a grantee may elect to use a definition of income similar to that used in the Section 8 program, under which the income of minor children may be excluded. But, as is the case with the Section 8 program, persons whose income is to be excluded would nevertheless be counted in determining the size of household for purposes of applying the income limits under the CDBG program. Thus, it is important to define household as including all persons, even if the income of some of them would not be considered in determining the income status of the household. We do not therefore view this as constituting a contradiction or conflict in the regulations as is stated in your memorandum.

In response to your final question, no specific time interval for repeating a survey is required or recommended. If a grantee chooses to carry out an income survey rather than use the decennial census data, the general rule is that it need not resurvey unless there is reason to believe that conditions in the community have changed so much that the prior data is inaccurate. Some grantees may wish to resurvey after the 1990 census data becomes available. As a general rule, the Department should challenge a survey that produces results that differ substantially from the Census data, unless there is other objective evidence that conditions in the applicable area have changed to a commensurate degree since the Census was taken. Grantees should be reminded that their survey methodology must meet the Department's general standards. For additional guidance in this matter, please refer to the attached July 11, 1988, memorandum on survey methodology.

If you have any further questions on this matter, please call the Entitlement Communities Division at FTS 458-1577.

Attachment

cc: Linda Marston, SC

