

# Rank Ordering Census Block Groups, Urban County Joint Agreements

November 18, 1987

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, D.C. 20410-7000

OFFICE OF THE ASSISTANT SECRETARY  
FOR COMMUNITY PLANNING AND DEVELOPMENT

November 18, 1987

MEMORANDUM FOR: All Regional Administrators  
All Category A Field Office Managers

ATTENTION: All Regional Directors for CPD  
All Field Office CPD Division Directors

FROM: Jack R. Stokvis, Deputy Assistant Secretary for Community Planning and Development, CD

**SUBJECT: Rank Ordering Census Block Groups  
Urban County-Joint Agreements**

It was recently realized that the CDBG computer program for rank ordering groups in existing urban counties does not properly include metropolitan cities participating in the urban county under a joint agreement. This will be corrected when future computer runs are made using this program. Therefore, counties attempting to requalify as an urban county and who wish to establish or continue a joint agreement with a metropolitan city should be advised immediately of the potential effects of such inclusion on fiscal year 1988 and future years CDBG activities. Joint agreements are authorized under 24 CFR 570.308 and are discussed in Section IV of the Urban County Notice (CPD 87-10) that was issued on September 1, 1987. Field Offices are urged to review this matter with each county and city affected by any such joint requests prior to approval, if one or both jurisdictions would fall under the "exception rule" for area benefit activities. Such review should be conducted using the separate computer runs already made for each county and city involved.

Under the "exception rule" at 24 CFR 570.208(a)(1)(ii) an eligible activity is considered to meet the low-and-moderate income area benefit objective if its service area has a percentage of low-and-moderate income persons that is equal to, or exceeds, that of the lowest-ranked block group in the upper quartile of all areas in the grantee's jurisdiction in terms of the degree of concentration of low-and-moderate-income persons. In order to facilitate the use of this provision for communities having a large number of block groups, HUD has developed a computer program for computing the percentage of low and moderate income persons for each block group and then rank ordering them in order to determine the upper quartile.

Under the regulations HUD considers a metropolitan city entering into such agreements to be the same as any other nonentitled unit of general local government. As such, the metropolitan city's block groups form a part of the urban county's configuration. Significant effects could occur as a result of a joint request from jurisdictions where either the urban county or the metropolitan city would otherwise fall under the "exception rule" criteria. Joint agreements result in a modification to an urban county's configuration, and since a change in the mix of census block groups in an urban county would likely change the relative ranking of specific block groups by quartile, this may also change the minimum concentration of low-and-moderate income persons acceptable to consider an area as low-and-moderate income under the "exception rule."

Field Offices should immediately advise urban counties and metropolitan cities that have requested joint participation of the possible effects of inclusion and how such agreements may impact their respective programs relative to the urban county configuration and rank ordering of Census block groups. Field Offices having such joint requests shall identify the participating metropolitan city as part of the urban county on the urban county status worksheet. Once final approval is given by Headquarters, the Field Office must arrange to produce a new rank ordering computer run.

For any other counties which requalify for urban county status and in which there is a change in the mix of participating units of local government from when they last qualified, a computer run must also be generated against the new configuration. Whenever applicable, a revised upper quartile figure developed against the new configuration is to be used for activities for which funds are first obligated in the first year of the new qualification, which will be 1988, and thereafter through the third year of qualification which is 1990. The upper quartile developed against the old configuration is to be used in reviewing any activity for which funds were first obligated prior to the 1988 program year.

If, based on your discussions of this matter with them, any city or county wishes to rescind a request for joint participation it should be allowed to do so. We will accept any such request for rescission received by HUD from either the city or the county by December 15, 1987.

Immediately following the receipt of all urban county status worksheets, Data Systems and Statistics Division will analyze the data and submit the urban county configurations to EMAD for processing. Field Offices will be notified once this data is entered and new computer runs made for urban counties reflecting the new configurations.

Questions or concerns regarding this policy or requests for assistance analyzing individual cases should be directed to Daniel Dodrill in the Entitlement Cities Division at (FTS) 755-5977. Questions relating to the operation of the computer program to secure the above information should be directed to Ray Kahn or Mike Allard in EMAD at (FTS) 755-5577.