

CDBG SMALL CITIES POLICY BULLETIN 2025-03



DATE: April 18, 2025
TO: CDBG Grantees and Interested Parties
FROM: Andrew Hayman, CDBG Director
RE: Survey Methodology and Review

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The purpose of this Bulletin is to inform grantees and grant administrators of an updated Survey Methodology and Review Process.

If U.S. Census data shows LMI below 24.99%, a challenge to the data will not be allowed. Waivers will not be allowed.

Before You Conduct a Survey

All requests to conduct a survey should be approved by CDBG staff prior to their commencement. Surveys are completed by housing unit, not persons. To initiate the survey process, the following documentation must be provided:

1. **A letter from the City or County:** The letter should provide a detailed description of the project, including its location and intended beneficiaries. It must include a map of the project site, an outline the survey methodology used, specify the applicant's population and estimated number of housing units.
2. **For Random Sample Surveys:** Communities with populations of 500 persons or fewer are ineligible to complete a random survey and must conduct a community-wide survey. For communities with a population of 500 persons or higher, a random sample survey is possible with approval from Commerce. If a community is eligible for a random sample survey, it is necessary to provide the estimated number of housing units within the city or county. This number will determine the number string that is generated to assist the community with conducting the survey. It is important that this figure for housing units is as accurate as possible. Sample size is based upon housing units and not strictly on population.

Please ensure that all necessary documents are submitted to CDBG staff before proceeding with any surveys. Survey Methodology approval will be issued by CDBG staff in the form of a formal memo. For Random Sample Surveys, an approved number string will be included with the approval memo.

It is essential that this approval memo be received before your community proceeds with conducting any surveys. Surveys conducted without pre-approval will not be recognized as valid for CDBG purposes.

We realize many communities have already begun surveying. Those communities should follow the same process above, indicating they have begun surveying. Their letter should include the type of survey they are conducting and the current number of completed surveys in addition to the other requirements.

Survey Submission and Approval Requirements

As part of the grantee application process, all surveys must be submitted prior to application submission. **Please note that it is a new requirement for surveys to be approved by CDBG staff before any award announcements.** Survey's may be mailed, or hand delivered to CDBG Staff, all of which must take place prior to submission. Electronic submission is not currently acceptable.

Surveys that do not meet the 51% Low-Moderate Income (LMI) national objective will be deemed non-compliant. In such cases, the survey will be returned to the grantee or their designated administrator for necessary corrections and resubmission.

It is critical to ensure that surveys comply with the 51% LMI threshold, as failure to do so may impact the eligibility and timeliness of your application. Please ensure all survey documentation is complete and meets the necessary requirements of 24 CFR 570.208(a)(1)(vi) before submission.