



U.S. Department of Housing and Urban Development

NSP Webinars

Transition to 2014 American Community Survey (ACS) Data in DRGR June 2nd, 2015

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Introduction

- Welcome
- Target audience: NSP & CDBG-DR Grantees
- Objective of Webinar
 - Overview of the 2014 ACS Data Transition Policy
 - Review exceptions and the 'Four Part Test'
 - Walk-through how to set up an area benefit activity (based on data set and timing of entry)
 - Answer questions



2014 ACS Data Transition - Key Facts

- Effective date is July 1, 2015
- Updated LMISD = 2014 ACS Data (ASC 5-Year 2006-2010 LMI Data)
- Prior LMISD = 2000 Census Data
- Notice CPD-15-05 supplements CPD-14-10 and CPD-14-11
- Updated LMISD (CDBG-DR and NSP) are located at:

<https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data/>



Transition Policy in Summary

All CDBG-DR and NSP grantees must use the Updated LMISD for all area benefit activities that were planned or underway as of July 1, 2015, unless the grantee can demonstrate that an activity meets the Four Part Test or Limited Exceptions and Clarifications to the Four Part Test, thereby permitting the continued use of the Prior LMISD for that activity only.



The Four Part Test

In order for the prior LMISD to remain in use, an activity must meet a four part test which requires:

1. An 'Award' or 'Obligation' before the effective date
2. A specific activity
3. A specific amount
4. A clearly defined service area

❖ This includes both grant funds and program income



Award vs. Obligation

- In most cases:
 - “Award” for States (CPD-14-10)
 - “Obligation” for Entitlements (CPD-14-11)
- Exceptions:
 - State CDGB-DR or NSP grant recipients that carried out activities directly just as CDBG entitlements do under 24 CFR 570.200(f).
 - Nontraditional grantees such as NSP2 Consortia and NSP3 grantees that entered into a joint agreement.
 - Grantees should consult with their CPD Rep to determine if the Entitlement or State regulations apply to their grant(s).



CPD-14-10 (States)

Example – Town of Springfield

The State awarded the Town of Springville \$300,000 to build a recreation center in the Oak Park neighborhood, which qualified under the prior LMISD, but not the updated LMISD. The award was publically announced before July 1, 2014, and the State had a description of the recreation center, the amount of the award, and a description of the Oak Park neighborhood.

Construction did not begin until after July 1, 2014.

Can the State continue to use the prior LMISD?



Answer

Yes - In this case, the Oak Park neighborhood would still qualify based on the prior LMISD, and the activity may continue as planned since it passed the four part test.

- ✓ An award before the effective date
- ✓ A specific activity
- ✓ A specific amount
- ✓ A clearly defined service area



CPD-14-11 (Entitlements)

Example – City of Springfield

The City of Springfield obligated \$300,000 to build a recreation center in the Hilltop neighborhood, which qualified under the prior LMISD, but not the updated LMISD. The City included the activity details as well as the area benefit qualification in its annual action plan, and signed the contract with the construction company prior to July 1, 2014. Construction did not begin until after July 1, 2014.

Can the City continue to use the prior LMISD?



Answer

Yes - In this case, the Hilltop neighborhood would still qualify based on the prior LMISD, and the activity may continue as planned since it passed the four part test.

- ✓ An obligation before the effective date
- ✓ A specific activity
- ✓ A specific amount
- ✓ A clearly defined service area



Limited Exceptions and Clarifications

Exceptions for States CPD-14-10

- Formula based Methods of Distribution
- Competitive Methods of Distribution
- Acquisition of Real Property
- Pre-award Costs
- Activities involving Loan or Grant Programs
- Cost Overruns

Exceptions for Entitlements CPD-14-11

- Multiple contracts
- Acquisition of Real Property
- Pre-award Costs
- Activities involving Loan or Grant Programs
- Cost Overruns



Still Unsure?

Grantees should refer to CPD-15-05 and consult with their CPD Representative to determine which data set is permitted for area benefit activities.



DRGR Functionality during the Transition

- All existing activities set-up with the 2000 Census as of July 1, 2015 will remain unchanged.
- Beginning on July 1, 2015, **only** the 2014 ACS data set will be available to grantees to set-up new activities or *edit existing activities*, even if grantees used the 2000 Census data set for an activity not yet entered into DRGR.
- Grantees are highly encouraged to examine all area benefit activities that will be planned or underway as of July 1, 2015 and take the appropriate steps to ensure compliance with the LMISD Transition Policy described in CPD-15-05.



Summary of Actions Based on LMISD Data Set and Timing of DRGR Data Entry

LMISD Data Set	Date of activity eligibility	Date entered into DRGR	DRGR requirements
2000 Census	Before July 1, 2015	Before July 1, 2015	<ol style="list-style-type: none"> 1. Select <i>Area Benefit – Census</i> 2. Select Census tracts and block groups or places 3. Indicate 2000 Census in <i>Location Description</i>
		After July 1, 2015	<ol style="list-style-type: none"> 1. Select <i>Area Benefit – Survey</i> 2. Manually enter the low- and moderate-income persons 3. Indicate 2000 Census in <i>Location Description</i> and list the Census tracts and block groups or places 4. Use the <i>Add Supporting Documentation</i> feature to attach the 2000 Census LMISD for the service area
	After July 1, 2015	After July 1, 2015	<ol style="list-style-type: none"> 1. Select <i>Area Benefit – Survey</i> 2. Manually enter the low- and moderate-income persons 3. Indicate 2000 Census in <i>Location Description</i> and list the Census tracts and block groups or places 4. Use the <i>Add Supporting Documentation</i> feature to attach the 2000 Census LMISD for the service area and compliance with the Four Part Test or exception criteria
2014 ACS	Before July 1, 2015	Before July 1, 2015	<ol style="list-style-type: none"> 1. Select <i>Area Benefit – Survey</i> 2. Manually enter the low- and moderate-income persons 3. Indicate 2014 ACS in <i>Location Description</i> and list the Census tracts and block groups or places 4. Use the <i>Add Supporting Documentation</i> feature to attach the 2014 ACS LMISD for the service area
	After July 1, 2015	After July 1, 2015	<ol style="list-style-type: none"> 1. Select <i>Area Benefit – Census</i> 2. Select Census tracts and block groups 3. Indicate 2014 ACS in <i>Location Description</i>



Activities determined to be eligible using 2000 Census data and entered into DRGR *before* July 1, 2015

1. Select Area Benefit – Census
2. Select Census tracts and block groups or places
3. Indicate 2000 Census in Location Description

The screenshot shows the 'Add Activity - Page 2' form in the DRGR system. The form is divided into several sections:

- Navigation:** Admin, Action Plans (selected), Drawdown, QPR, Reports.
- Buttons:** Edit Previous Screen, Save Activity, Cancel, Identify Census Geography (annotated with a red box and arrow labeled '2').
- Report Benefit Performance By:** Area Benefit (selected), Direct Benefit. Under Area Benefit, there are radio buttons for Census (selected) and Survey (annotated with a red box and arrow labeled '1').
- Proposed Beneficiaries:** A table with columns: Performance Measure, Proposed Total, Low, Mod. The row for '# of Persons' has empty input fields.
- Location Description:** A text area with a rich text editor toolbar (annotated with a red box and arrow labeled '3').
- Supporting Documents:** A section with a file upload area and links for 'Add Additional Documents' and 'Remove Selected Document'. A note specifies valid file extensions: .png .gif .jpg .jpeg .doc .docx .xls .xlsx .ppt .pptx .pdf.
- Footer:** Edit Previous Screen, Save Activity, Cancel, Identify Census Geography.



Activities determined to be eligible using 2000 Census data *before* July 1, 2015, but entered into DRGR *after* July 1, 2015

1. Select Area Benefit – Survey
2. Manually enter the low- and moderate-income persons
3. Indicate 2000 Census in Location Description and list the Census tracts and block groups or places
4. Use the Add Supporting Documentation feature to attach the 2000 Census LMISD for the service area

The screenshot shows the 'Action Plans' section of the DRGR system, specifically the 'Add Activity - Page 2' form. The form is divided into several sections, each highlighted with a red box and a numbered arrow indicating the steps from the list on the left:

- Section 1:** 'Report Benefit Performance By:' with radio buttons for 'Area Benefit' (selected), 'Direct Benefit', 'Census', and 'Survey'. A red box and arrow labeled '1' point to this section.
- Section 2:** 'Proposed Beneficiaries:' containing a table with columns for 'Performance Measure', 'Proposed Total', 'Low', and 'Mod'. A red box and arrow labeled '2' point to this section.
- Section 3:** 'Location Description:' with a text area and a rich text editor toolbar. A red box and arrow labeled '3' point to this section.
- Section 4:** 'Supporting Documents' with a file upload area and a list of documents. A red box and arrow labeled '4' point to this section.

The form also includes navigation buttons at the top ('Admin', 'Action Plans', 'Drawdown', 'QPR', 'Reports') and bottom ('Edit Previous Screen', 'Save Activity', 'Cancel', 'Identify Census Geography').



Activities determined to be eligible using 2000 Census data and entered into DRGR *after* July 1, 2015

1. Select Area Benefit – Survey
2. Manually enter the low- and moderate-income persons
3. Indicate 2000 Census in Location Description and list the Census tracts and block groups or places
4. Use the Add Supporting Documentation feature to attach the 2000 Census LMISD for the service area and compliance with the Four Part Test or exception criteria

Action Plans

Add Activity - Page 2 [Help?](#)

Edit Previous Screen | Save Activity | Cancel | Identify Census Geography

Report Benefit Performance By:

Area Benefit Direct Benefit

Census Survey

Proposed Beneficiaries:

Performance Measure	Proposed Total	Low	Mod
# of Persons	<input type="text"/>	<input type="text"/>	<input type="text"/>

Location Description:

Supporting Documents * Valid file extensions are: .png .gif .jpg .jpeg .doc .docx .xls .xlsx .ppt .pptx .pdf

None

[Add Additional Documents](#) | [Remove Selected Document](#)

Edit Previous Screen | Save Activity | Cancel | Identify Census Geography



Activities determined to be eligible using 2014 ACS data and entered into DRGR *before* July 1, 2015

1. Select Area Benefit – Survey
2. Manually enter the low- and moderate-income persons
3. Indicate 2014 ACS in Location Description and list the Census tracts and block groups or places
4. Use the Add Supporting Documentation feature to attach the 2014 ACS LMISD for the service area

The screenshot shows the 'Add Activity - Page 2' form in the DRGR system. The form is divided into several sections, with red boxes and numbered callouts (1-4) highlighting specific areas:

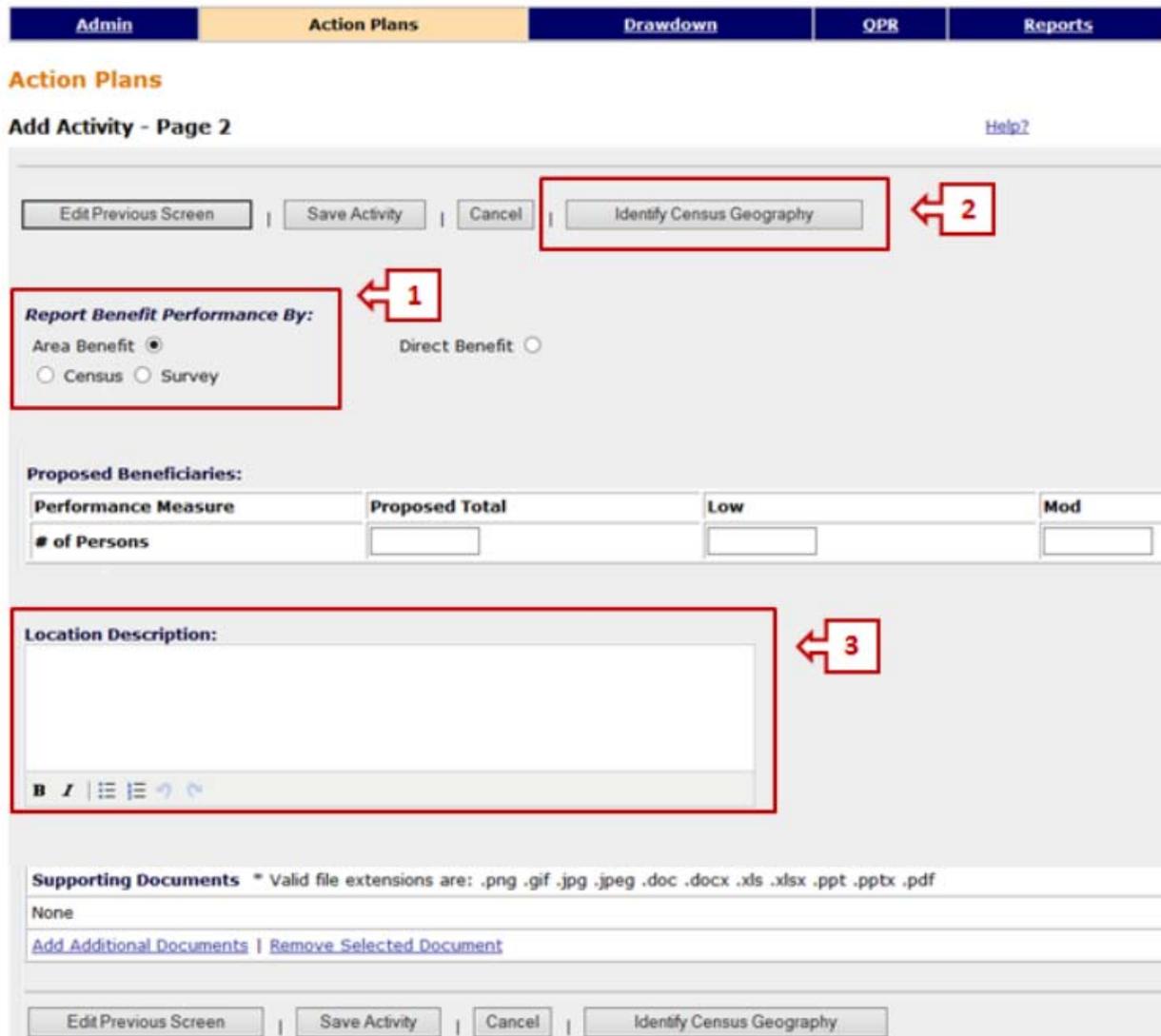
- Callout 1:** Points to the 'Report Benefit Performance By:' section, which includes radio buttons for 'Area Benefit' (selected), 'Direct Benefit', 'Census', and 'Survey'.
- Callout 2:** Points to the 'Proposed Beneficiaries:' table, which has columns for 'Performance Measure', 'Proposed Total', 'Low', and 'Mod'. The 'Low' and 'Mod' columns have input fields.
- Callout 3:** Points to the 'Location Description:' text area, which is empty and has a rich text editor toolbar below it.
- Callout 4:** Points to the 'Supporting Documents' section, which includes a list of documents (currently 'None') and links for 'Add Additional Documents' and 'Remove Selected Document'.

The form also features a navigation bar at the top with tabs for 'Admin', 'Action Plans', 'Drawdown', 'QPR', and 'Reports'. The 'Action Plans' tab is active. At the bottom, there are buttons for 'Edit Previous Screen', 'Save Activity', 'Cancel', and 'Identify Census Geography'.



Activities determined to be eligible using 2014 ACS data and entered into DRGR *after* July 1, 2015

1. Select Area Benefit – Census
2. Select Census tracts and block groups
3. Indicate 2014 ACS in Location Description



The screenshot shows the 'Action Plans' section of the DRGR system. The 'Add Activity - Page 2' form includes a navigation bar with 'Admin', 'Action Plans', 'Drawdown', 'QPR', and 'Reports'. The 'Identify Census Geography' button is highlighted with a red box and arrow labeled '2'. The 'Report Benefit Performance By:' section has 'Area Benefit' selected with a radio button, highlighted with a red box and arrow labeled '1'. The 'Proposed Beneficiaries' table has columns for 'Performance Measure', 'Proposed Total', 'Low', and 'Mod', with a row for '# of Persons'. The 'Location Description' text area is highlighted with a red box and arrow labeled '3'. The 'Supporting Documents' section lists valid file extensions and includes 'Add Additional Documents' and 'Remove Selected Document' links. The bottom navigation bar contains 'Edit Previous Screen', 'Save Activity', 'Cancel', and 'Identify Census Geography' buttons.

Performance Measure	Proposed Total	Low	Mod
# of Persons			



HUD Resources

- The complete Notice CPD 15-05:

<https://www.hudexchange.info/resources/documents/Notice-CPD-15-05-Transition-Policy-for-Low-Moderate-Income-Summary-Data.pdf>

- The DRGR Fact Sheet: Transition to 2014 American Community Survey (ACS) Data

<https://www.hudexchange.info/resources/documents/DRGR-Fact-Sheet-Transition-to-2014-American-Community-Survey-ACS-Data.pdf>



Discussion and Q&A



Thank You

Please complete the Survey

<https://www.surveymonkey.com/s/XRMZC85>

You will also receive the survey by email.

