

October 20, 2003

TO: Office of Housing and Community Partnerships (OHCP) Grant Recipients

FROM: Lisa Patt-McDaniel, Office Chief, Office of Housing and Community Partnerships

SUBJECT: Low- and Moderate-Income and Civil Rights Data Reporting Requirements

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This memorandum is written to clarify the Office of Housing and Community Partnerships (OHCP) low- and moderate-income (LMI) and civil rights data reporting requirements.

In July, OHCP revised the performance reports for OHCP-awarded grants. The reports now request information regarding race and ethnicity that is available from the 2000 Census. However, for grants funded prior to the issuance of the 2000 Census data (i.e., FY 2002 and previous years), the data is not available in this level of detail for area wide benefit projects. Even for direct benefit activities, grantees may not be tracking demographic categories, such as race and ethnicity, as requested by the new reporting format. So, for FY 2002 and earlier grant awards, OHCP encourages the reporting of civil rights data in all categories, but will accept performance reports that only include the civil rights data for the five single-race categories that were previously accepted.

To report LMI beneficiary data for area wide benefit, limited clientele and slum and blight activities funded in FY 2002 or before, grant recipients should use the 1990 LMI information. For such activities, the LMI data does not need to be reported by income category (i.e., 0-30%, 30-50% and 50-80%), but by total number of LMI beneficiaries assisted. For these activities funded in FY 2003 and later, grant recipients will need to report by the three income categories. However, OHCP is proposing to automate this data reporting requirement to facilitate the reporting and data input process. Instructions on how to complete the Final Performance Reports (FPRs) for FY 2003 and later grants will be provided with the FPRs.

To prepare for this, the OHCP Ohio 2000 LMI Access database was recently changed to enable OHCP staff to access the number of LMI persons for the three income categories by jurisdiction, tract and block group. This data will be sent to each of the Formula County and Direct City Grantees. In addition, this information is already included on the Maptitude OhioMaps CD provided by OHCP in the LMI Census Tract and Block Group layers. Any grantee may request the data from their field representative in hard copy, fax or e-mail.

The above guidance regarding LMI beneficiary reporting does not apply to direct benefit activities such as housing activities, for which grant recipients must report by income category. Thus, the only impact of these changes on grantees now is that FY 2003 direct benefit activities, such as housing, must now begin to record this information for each beneficiary so it will be available when the FPR data is requested.

In conclusion, for grants awarded prior to July 1, 2003 (FY 2002 grants and earlier), award recipients should report beneficiaries and civil rights data for area wide, limited clientele and slum and blight activities based on the 1990 Census data using the five single-race categories previously accepted and total LMI beneficiaries, since that data qualified the project for funding, while direct benefit projects should report for civil rights data and the three income categories as has been required in the past.

For grants awarded on or after July 1, 2003 (FY 2003 and future years), grantees must collect and submit data as follows:

- For direct benefit activities - data for the three LMI categories, civil rights data for the 10 racial categories and Hispanic ethnicity data.
- For LMI area wide benefit projects, the grantee must provide required Census tract and block group data and total LMI beneficiaries as requested on the FPR.
- For limited clientele activities, the grantee must enter the total number of beneficiaries and OHCP will calculate the LMI categories and civil rights data.
- Slum and blight activities will require the grantee to enter data for the three LMI categories for the service area, based on the Census data that is made available to the grantee.

Questions regarding the performance report requirements should be directed to OHCP at (614) 466-2285.

LPM/MH/ps