



LMI Methodology and Calculation

CDBG 2025
Application Workshop
May 6, 2025



Intro to LMI- Low to Moderate Income

- Key eligibility requirement for CDBG – our “national objective”
- CDBG applicants must prove that their population is at least 51% LMI.
- LMI is defined as 80% of the Section 8 guidelines (given per county) (the “low” number should be used) Exhibit B
- HUD presumes to be LMI (seniors, severely disabled, homeless, illiterate, and others, see p. 20). Projects serving such a group may qualify under “limited clientele”
- Pages 10-22 in 2025 Application Instructions

How Applicants Qualify- 3 ways

- ▶ 1. Using American Community Survey data for a project providing entity-wide benefit
- ▶ 2. Using LMC – limited clientele, if project is providing benefit to a qualifying group
- ▶ 3. By doing a Survey for a targeted area* – but the survey may show they don't qualify!
- ▶ *alternative means of documenting a targeted area



ACS LMI

ACS Survey Data for 2025 CDBG Applicants							
Entity	LMI '24	LMI '22	LMI '20	Entity	LMI '24	LMI '22	LMI '20
Alamogordo city	39%	41%	45%	Lee County	39%	38%	39%
Angel Fire village	23%	25%	31%	Lincoln County	39%	41%	44%
Anthony city	67%	65%	67%	Logan village	47%	50%	48%
Artesia city	43%	40%	48%	Lordsburg city	50%	55%	53%
Artec city	47%	38%	46%	Los Alamos County	19%	22%	24%
Bayard city	48%	48%	49%	Los Lunas village	32%	39%	40%
Belen city	62%	76%	63%	Los Ranchos de Albuquerque village	30%	32%	39%
Bernalillo County	42%	42%	45%	Loving village	54%	68%	54%
Bernalillo town	51%	50%	53%	Lovington city	39%	43%	44%
Bloomfield city	42%	31%	43%	Luna County	52%	55%	59%
Bosque Farms village	34%	31%	46%	Magdalena village	46%	53%	53%
Capitan village	41%	60%	45%	Marwell village	74%	70%	48%
Carlsbad city	36%	46%	38%	McKinley County	55%	56%	56%
Carrizozo town	64%	67%	64%	Melrose village	50%	48%	31%
Catron County	60%	35%	45%	Mesilla town	32%	27%	35%
Causey village	85%	36%	44%	Milan village	50%	50%	41%
Chama village	42%	31%	53%	Mora County	59%	73%	57%
Chaves County	44%	42%	46%	Moriarty city	70%	63%	69%
Cibola County	46%	51%	50%	Mosquero village	67%	20%	60%
Cimarron village	63%	46%	58%	Mountainair town	52%	83%	61%
Clayton town	53%	49%	62%	Otero County	42%	45%	48%
Cloudcroft village	53%	39%	37%	Pecos village	57%	50%	55%
Clovis city	44%	43%	45%	Peralta town	31%	41%	45%
Colfax County	50%	46%	49%	Portales city	45%	52%	51%
Columbus village	90%	80%	86%	Quay County	54%	48%	60%
Corona village	44%	38%	55%	Questa village	32%	48%	51%
Corrales village	20%	22%	22%	Raton city	55%	48%	57%
Cuba village	54%	65%	64%	Red River town	52%	42%	31%
Curry County	42%	43%	43%	Reserve village	94%	59%	82%
De Baca County	47%	50%	57%	Rio Arriba County	43%	44%	49%
Deming city	53%	60%	62%	Roosevelt County	44%	50%	46%
Des Moines village	62%	72%	67%	Roswell city	46%	43%	47%
Dexter town	44%	46%	64%	Roy village	56%	61%	82%
Dofia Ana County	47%	47%	48%	Ruidoso Downs city	50%	62%	65%
Dora village	35%	38%	39%	Ruidoso village	39%	34%	42%
Eagle Nest village	38%	57%	48%	San Jon village	54%	58%	55%
Eddy County	38%	42%	40%	San Juan County	42%	38%	45%
Edgewood town	39%	29%	38%	San Miguel County	52%	51%	56%
Elephant Butte city	38%	53%	41%	San Ysidro village	82%	57%	60%
Elida town	31%	53%	56%	Sandoval County	34%	34%	38%
Encino village	47%	71%	62%	Santa Clara village	59%	60%	58%
Espanola city	54%	55%	54%	Santa Fe County	41%	41%	42%
Estancia town	55%	65%	78%	Santa Rosa city	45%	41%	68%
Eunice city	43%	43%	43%	Sierra County	50%	52%	58%
Floyd village	28%	50%	52%	Silver City town	60%	44%	55%
Folsom village	5%	88%	50%	Socorro city	41%	58%	50%
Fort Sumner village	50%	65%	69%	Socorro County	48%	56%	52%
Gallup city	46%	38%	45%	Springer town	48%	59%	48%
Grady village	10%	65%	43%	Sunland Park city	57%	56%	64%
Grant County	49%	41%	49%	Taos County	44%	47%	49%
Grants city	48%	44%	49%	Taos Ski Valley village	0%	74%	18%
Grenville village	11%	30%	30%	Taos town	56%	55%	56%
Guadalupe County	47%	43%	70%	Tatum town	42%	54%	43%
Hagerman town	64%	54%	58%	Tecico city	58%	59%	53%
Harding County	51%	44%	60%	Tijeras village	32%	35%	34%
Hatch village	50%	69%	61%	Torrance County	56%	59%	60%
Hidalgo County	44%	49%	57%	Truth or Consequences city	55%	53%	63%
Hobbs city	43%	39%	41%	Tucuman city	41%	41%	41%

LMI Methodology Request- for ACS – **DUE JUNE 6, 2025**

Once DFA
approves, this LMI
requirement is
complete.

Describes scope of planned project

Proves that the project benefits will extend to the **entity's entire population**

Includes the % per the ACS sheet

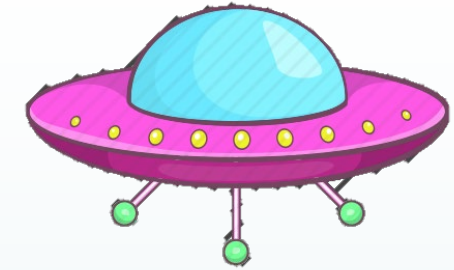
Includes the population

Should provide map in attachment, if applicable to justify that the benefit extends to the entire population.

***** If an entity has still not decided on a project, they may submit more than one such request. I.e. one letter for a street and drainage, and another letter for a wastewater project.

LMC (Limited Clientele) LMI Methodology Request

– due June 6, 2025



- Describes project and population served to satisfy 24 CFR 570.208
- Either designates a group(s) with presumed LMI population: abused children, battered spouses, elderly persons, severely disabled, homeless, illiterate, persons living with AIDS, etc. Clarifies whether 100% of the beneficiaries are part of this group.
- Or provides information on income to prove that 51% of the group served are LMI.
- Or the activity has income eligibility requirements restricting to LMI persons
- Refer to application instructions and check with Project Manager for more.

If a survey or additional documentation is needed, after the Methodology approval, it must be submitted by the
July 15 LMI Calculation Deadline

LMI by Survey: 4 Letters exchanged...

Methodology Deadline June 6, 2025

- ▶ Letter #1 from applicant to DFA to request LMI methodology approval
- ▶ Letter #2 from DFA to approve LMI methodology

Applicant DOES SURVEY, then...

LMI Calculation Deadline July 15, 2025

- ▶ Letter #3 from applicant to request **LMI calculation approval** (survey approval)
- ▶ Letter #4 from DFA to approve survey results



LMI/Survey (Letter #1)

- Contains project description
- Specifies the exact number of households in the universe to be surveyed, AND the sample size
- Selects a **method of survey** will be used, and how any follow up will be made – very important if using online method
- Attachments:
 - Map of the “universe”
 - Sample questionnaire, populated with the Section 8 numbers for the county
 - Includes randomizer
- Check the CDBG Application Instructions and [CDBG Guidebook for Conducting Local Income Surveys](#)

SAMPLE SURVEY LMI Methodology Letter

The City of Hobbs would like to apply for 2021 CDBG funding for street rehabilitation, storm drainage; and sidewalk improvements. The City's LMI percentage, based on ACS Survey Data, is 41%. The City understands that the survey method is acceptable when targeting a specific area where the primary beneficiaries are not the entire City, only those in the immediate project area. The City has identified two potential project areas. We would like to survey both areas and see if one or both results in a 51% or higher LMI.

The following survey methodology will be used:

Type of Survey – The survey will be a door to door survey and phone follow up with residents on the attached plat and address list. (*attached*). Flyers will be left on the door asking the resident to follow up with a phone call.

Use of questionnaire – Survey forms are the English and Spanish survey forms with Lea County HUD income limits from the 2021 CDBG Application Manual (*attached*)

Select the Sample – There are 62 residences on Location #1 and 54 residences on Location #2. This will be the **sample universe**. This list excludes non residential, commercial and vacant addresses. This list **identifies individual households**. The new **required sample size** for this number of households is 31 and 33 as determined by the attached list provided at the CDBG application workshop.

A randomizer from Randomizer.org was used to randomly selected the required sample number. These randomizers are attached.

Non reachable households will be given a value of 2.5 high income.

We are seeking approval of this survey methodology. Documentation including the English and Spanish Surveys; Randomizer; address lists and location maps are included. If you need additional information, please contact me

Sample map of universe

Quay Road 62.9
Quay County, New Mexico

HOUSE NUMBER	ADDRESS	HOUSE NUMBER	ADDRESS
1	4165 Quay Rd 62.9 #1	1	4207 Quay Rd 62.9
2	4165 Quay Rd 62.9 #2	2	4211 Quay Rd 62.9
3	4165 Quay Rd 62.9 #3	3	4179A Quay Rd 62.9
4	4165 Quay Rd 62.9 #4	4	4325 Quay Rd 62.9
5	4165 Quay Rd 62.9	5	4267 Quay Rd 62.9
6	4165 Quay Rd 62.9 #5	6	6271 Quay Rd AQ
7	4171 Quay Rd 62.9	7	6275 Quay Rd AQ
8	4177 Quay Rd 62.9	8	6277 Quay Rd AQ
9	4219 Quay Rd 62.9	9	6291 Quay Rd AQ
10	4255 Quay Rd 62.9	10	6299 Quay Rd AQ
11	4185 Quay Rd 62.9	11	6249 Quay Rd AR
12	4247 Quay Rd 62.9		

N
↑

0

0.125

0.25

0.5

miles

This map is published and distributed by the Quay County Manager's office. It is a representation of certain man-made, physical and natural features existing in Quay County, New Mexico. The county of Quay or its agencies disclaim all liability regarding the accuracy of this map and its associated data. Reproduction of this map or any portion thereof is not permitted without prior written permission from the Quay County Manager's office. ("Quay Rd 62.9.pdf", 05/19/22)

Letter #3 (from Applicant to DFA with survey results)

- Contains total number of beneficiaries, number of LMI beneficiaries, and percentage of LMI
- Reports the number of households in universe and those surveyed, and # of non-respondents

Attachments:

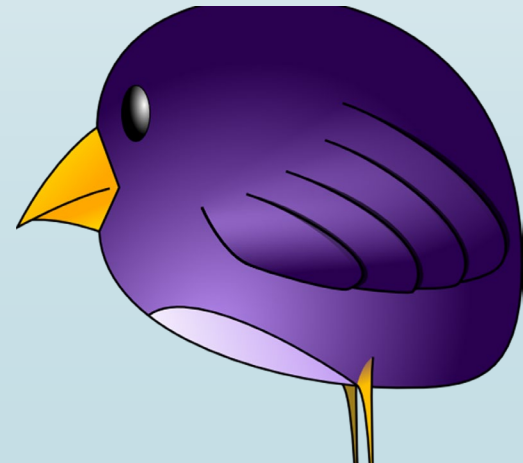
Excel spreadsheet with all responses (including demographics)

All survey questionnaires

Exhibit D signed by all surveyors

Exhibit E

Map (again)



August 19, 2022

Dora Batista, Executive Director
SENMEDD, COG
1600 SE Main Street, Ste. D
Roswell, NM 88203

Re: Ruidoso Downs CDBG 2022 Application Survey Approval

Dear Ms. Batista:

This is to confirm the approval of your survey for the proposed water system improvement project on Valley View Drive in the City of Ruidoso Downs.

Our review of your survey found that it was consistent with the survey methodology we approved on June 16, 2022. Your survey results project that 90 citizens will benefit from the project, 53 of whom are low-to-moderate income - a 59% LMI, which exceeds the national objective requirement of at least 51%.

Congratulations on the successful completion of your survey. Please remember to include both this letter and your request letter in your application.

Wishing you the best of luck with your application.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maureen Ayers".

Maureen Ayers
Project Manager

**Sample letter #4 from
DFA to applicant to
approve survey**



LMI in the application

Applicants must include all LMI letters - both TO and FROM DFA (four for surveys, two if ACS)

Must include copies of all previously approved survey materials

If no letter from DFA saying the LMI was approved, the application is *not* eligible.

Demographic data taken from survey is used in the application form.



LMI Deadlines

- LMI Methodology Approval **June 6, 2025**
- LMI Calculation /Documentation **July 15, 2025**
- **Application Deadline** **August 19, 2025**

Include in application: All LMI documentation and letters exchanged, including approval letters.

“Targeted LMI”

- Alternative option may be possible using census blocks.
- Ask Project Manager for the information which includes a link to HUD GIS/ ARCGIS datasheet allows to separate census blocks.
- Applicant will have to justify that the entire target area (census block) will benefit.

Useful Links

[2024 ACS-Summary-LMI.pdf](#)

[CDBG-2025-Application-Instructions](#)

[Exhibit B Section 8 Income Limits](#)

[Exhibit C](#)

[Exhibit D](#)

[Exhibit E](#)

[Exhibit F Site Certificate](#)

[Exhibit G Application Form](#)

[Exhibit H Matching Funds Resolution](#)

