

One of the attractions of State Vocational Rehabilitation Agencies (SVRAs), in partnership for banks, is the ability to capture and report income in bank-supported activity. As noted earlier, banks are recognized in Community Reinvestment Act (CRA) audits for making an impact for communities/individuals at low- and moderate-income (LMI) that will increase their standard of living.

A challenge for SVRAs in this respect is that low-income is not defined the same way for Vocational Rehabilitation (VR) as it is for banks under CRA.

Terms	Banks (CRA)	Vocational Rehabilitation
<b>Standard</b>	Low- and Moderate-Income	Low-Income
<b>Definition</b>	Under the CRA, the term <i>low- and moderate-income</i> refers to communities in certain geographies that have income levels that fall between certain ranges, as determined by the Census Bureau. A low-income community means there is a median family income of less than 50 percent of the area median income. A moderate-income community means that the median family income is at least 50 percent and less than 80 percent of the area median income. ( <a href="#">Federal Board of Governors</a> )	Meet one or more of the following: (a) Receives, or in the six months prior to application to the program has received, or is a member of a family that is receiving or in the past six months prior to application to the program has received, public assistance (SNAP, TANF, SSI, Medicaid and other federal/state/local assistance); (b) Is in a family with total family income that does not exceed the higher of the poverty line or 70% of the lower living standard income level; (c) Is a youth who receives or is eligible to receive a free or reduced-price lunch; (d) Is a foster child on behalf of whom state or local government payments are made; (e) Is a participant with a disability whose own income is the poverty line, but who is a member of a family whose income does not meet this requirement; (f) Is a homeless participant or a homeless child or youth or runaway youth (see PIRL Data Element #700); or (g) Is a youth living in a high-poverty area.
<b>How Applied</b>	Bank activity qualifies for CRA credit when it engages LMI individuals  Documented by individual or <a href="#">census tract</a>	1) Tracked for all VR participants 2) May be used in state policy on determining client participation in payment of certain services

VR agencies capture income data at enrollment and at closure which will support the agency's ability to report impact of activity. When reaching out to a bank to discuss partnership opportunities, it is also good to have information on hand about the overall percentage of individuals served that fall at or below the moderate-income level based on the statewide median.

**Example:** A representative from X Agency wishes to approach a bank for purposes of developing a partnership. As an important piece of information to share includes the percentage of those served by the agency who live at or below a moderate-income level, they used the chart below (LMI Projections for Statewide Activity) to identify what is 80% of the state median income. They found that, for the state, \$67,520 is the median income and \$54,016 or below is the income level that individuals would report if they were considered LMI. The agency will run a data analysis of current individuals served to determine what percent reported annual income at or below \$54,016 at enrollment.

In sharing this information with the bank, the agency provides the bank with confidence that service populations for initiatives that they can do together will generate CRA credit for the bank, plus establish an understanding that this is information that the SVRA is prepared to share and report over the course of project activity.

## **LMI Projections for Statewide activity – based on 2022 data**

Statewide Real Median Income - [2022, Release Tables: Real Median Household Income by State, Annual | FRED | St. Louis Fed \(stlouisfed.org\)](#) (Real Median Income figures published online by state for 2022 by the Federal Reserve Bank of St. Louis, and included in chart below along with the calculation for the LMI ceiling for activity that has a statewide focus)

The “LMI Ceiling” is in reality 80% of the median income for the state for this chart. Everyone you serve that is enrolled in your program that earns below that LMI ceiling meets the LMI criteria. (If the focus of a project is not statewide, but in a smaller area, you will need to interpret LMI differently).

# Calculating LMI

State	2022 Real Median Income	LMI Ceiling	More State information
Alabama	\$59,910	\$47,928	<a href="#">Real Median Household Income in Alabama   FRED   St. Louis Fed</a>
Alaska	\$89,740	\$71,792	<a href="#">Real Median Household Income in Alaska   FRED   St. Louis Fed</a>
Arizona	\$73,450	\$58,760	<a href="#">Real Median Household Income in Arizona   FRED   St. Louis Fed</a>
Arkansas	\$53,980	\$43,184	<a href="#">Real Median Household Income in Arkansas   FRED   St. Louis Fed</a>
California	\$85,300	\$68,240	<a href="#">Real Median Household Income in California   FRED   St. Louis Fed</a>
Colorado	\$89,930	\$71,944	<a href="#">Real Median Household Income in Colorado   FRED   St. Louis Fed</a>
Connecticut	\$90,730	\$72,584	<a href="#">Real Median Household Income in Connecticut   FRED   St. Louis Fed</a>
Delaware	\$80,750	\$64,600	<a href="#">Real Median Household Income in Delaware   FRED   St. Louis Fed</a>
District of Columbia	\$101,700	\$81,360	<a href="#">Real Median Household Income in the District of Columbia   FRED   St. Louis Fed</a>
Florida	\$65,370	\$52,296	<a href="#">Real Median Household Income in Florida   FRED   St. Louis Fed</a>
Georgia	\$67,730	\$54,184	<a href="#">Real Median Household Income in Georgia   FRED   St. Louis Fed</a>
Hawaii	\$91,010	\$72,808	<a href="#">Real Median Household Income in Hawaii   FRED   St. Louis Fed</a>
Idaho	\$72,580	\$58,064	<a href="#">Real Median Household Income in Idaho   FRED   St. Louis Fed</a>
Illinois	\$78,000	\$62,400	<a href="#">Real Median Household Income in Illinois   FRED   St. Louis Fed</a>
Indiana	\$70,030	\$56,024	<a href="#">Real Median Household Income in Indiana   FRED   St. Louis Fed</a>
Iowa	\$76,320	\$61,056	<a href="#">Real Median Household Income in Iowa   FRED   St. Louis Fed</a>
Kansas	\$73,040	\$58,432	<a href="#">Real Median Household Income in Kansas   FRED   St. Louis Fed</a>
Kentucky	\$55,880	\$44,704	<a href="#">Real Median Household Income in Kentucky   FRED   St. Louis Fed</a>
Louisiana	\$58,330	\$46,664	<a href="#">Real Median Household Income in Louisiana   FRED   St. Louis Fed</a>
Maine	\$75,160	\$60,128	<a href="#">Real Median Household Income in Maine   FRED   St. Louis Fed</a>
Maryland	\$108,200	\$86,560	<a href="#">Real Median Household Income in Maryland   FRED   St. Louis Fed</a>
Massachusetts	\$93,550	\$74,840	<a href="#">Real Median Household Income in Massachusetts   FRED   St. Louis Fed</a>
Michigan	\$68,990	\$55,192	<a href="#">Real Median Household Income in Michigan   FRED   St. Louis Fed</a>
Minnesota	\$90,390	\$72,312	<a href="#">Real Median Household Income in Minnesota   FRED   St. Louis Fed</a>
Mississippi	\$48,610	\$38,888	<a href="#">Real Median Household Income in Mississippi   FRED   St. Louis Fed</a>
Missouri	\$71,520	\$57,216	<a href="#">Real Median Household Income in Missouri   FRED   St. Louis Fed</a>
Montana	\$72,980	\$58,384	<a href="#">Real Median Household Income in Montana   FRED   St. Louis Fed</a>

# Calculating LMI

State	2022 Real Median Income	LMI Ceiling	More State information
Nebraska	\$78,360	\$62,688	<a href="#">Real Median Household Income in Nebraska   FRED   St. Louis Fed</a>
Nevada	\$72,330	\$57,864	<a href="#">Real Median Household Income in Nevada   FRED   St. Louis Fed</a>
New Hampshire	\$84,970	\$67,976	<a href="#">Real Median Household Income in New Hampshire   FRED   St. Louis Fed</a>
New Jersey	\$92,340	\$73,872	<a href="#">Real Median Household Income in New Jersey   FRED   St. Louis Fed</a>
New Mexico	\$56,420	\$45,136	<a href="#">Real Median Household Income in New Mexico   FRED   St. Louis Fed</a>
New York	\$75,910	\$60,728	<a href="#">Real Median Household Income in New York   FRED   St. Louis Fed</a>
North Carolina	\$65,070	\$52,056	<a href="#">Real Median Household Income in North Carolina   FRED   St. Louis Fed</a>
North Dakota	\$78,720	\$62,976	<a href="#">Real Median Household Income in North Dakota   FRED   St. Louis Fed</a>
Ohio	\$67,520	\$54,016	<a href="#">Real Median Household Income in Ohio   FRED   St. Louis Fed</a>
Oklahoma	\$63,440	\$50,752	<a href="#">Real Median Household Income in Oklahoma   FRED   St. Louis Fed</a>
Oregon	\$86,780	\$69,424	<a href="#">Real Median Household Income in Oregon   FRED   St. Louis Fed</a>
Pennsylvania	\$72,210	\$57,768	<a href="#">Real Median Household Income in Pennsylvania   FRED   St. Louis Fed</a>
Rhode Island	\$80,650	\$64,520	<a href="#">Real Median Household Income in Rhode Island   FRED   St. Louis Fed</a>
South Carolina	\$61,770	\$49,416	<a href="#">Real Median Household Income in South Carolina   FRED   St. Louis Fed</a>
South Dakota	\$67,180	\$53,744	<a href="#">Real Median Household Income in South Dakota   FRED   St. Louis Fed</a>
Tennessee	\$65,380	\$52,304	<a href="#">Real Median Household Income in Tennessee   FRED   St. Louis Fed</a>
Texas	\$74,640	\$59,712	<a href="#">Real Median Household Income in Texas   FRED   St. Louis Fed</a>
Utah	\$95,800	\$76,640	<a href="#">Real Median Household Income in Utah   FRED   St. Louis Fed</a>
Vermont	\$72,190	\$57,752	<a href="#">Real Median Household Income in Vermont   FRED   St. Louis Fed</a>
Virginia	\$85,170	\$68,136	<a href="#">Real Median Household Income in Virginia   FRED   St. Louis Fed</a>
Washington	\$89,430	\$71,544	<a href="#">Real Median Household Income in Washington   FRED   St. Louis Fed</a>
West Virginia	\$52,460	\$41,968	<a href="#">Real Median Household Income in West Virginia   FRED   St. Louis Fed</a>
Wisconsin	\$73,330	\$58,664	<a href="#">Real Median Household Income in Wisconsin   FRED   St. Louis Fed</a>
Wyoming	\$73,090	\$58,472	<a href="#">Real Median Household Income in Wyoming   FRED   St. Louis Fed</a>
United States	\$74,580	\$59,664	<a href="#">Real Median Household Income in the United States   FRED   St. Louis Fed</a>

The U.S. Territory projections below for the nonmetro portion of the territories are from the Federal Financial Institutions Examination Council (FFIEC) Census and FFIEC Estimated MSA/MD Median Family Income for 2023 CRA/HMDA Reports.

US Territory	2023 FFIEC Est. MSA/MD Median Family Income	LMI Ceiling
American Samoa	\$35,100	\$28,080
Guam	\$74,000	\$59,200
Northern Mariana Islands	\$40,600	\$32,480
Puerto Rico	\$24,800	\$19,840
Virgin Islands	\$61,800	\$49,440

If the partnership implements a project that is statewide by design, using the same approach as the earlier ‘X Agency’ example to reference number of participants that might be involved who are below LMI, will be the most useful. It may be that the identified objective for a project may be to have a certain number or percentage of participants complete the activity above LMI, in which case this process will support you in setting the bar.

**Example:** The Y Agency and their bank partner have established a partnership with a network of community colleges statewide to provide material handling training to LMI individuals with disabilities served by the VR agency. This is an intensive, one-semester program that will include work experience or on-the-job training during a second semester. This team used the above chart (LMI Projections for Statewide Activity) to identify what is 80% of the median income for the state. They found that \$67,520 is the median income for the state and \$54,016 or below is the income level that individuals would report if they were considered LMI. The agency will monitor income for program completers and report income levels above \$54,016 as successful outcomes for the bank to use in their reporting.

## LMI Projections for Regional or Local Projects

### Regional/MSA

Many banks that a SVRA might engage in a partnership may prefer to work in a particular community or area of the state. While we suggest using the method above for your initial outreach to banks to help tell the ‘story’ of the population that you serve, you may need to narrow your definition to include just the data relevant to a metropolitan statistical area (MSA) that is unique to where the project will be implemented. The hyperlink for Regional/MSA above will take you to a resource developed by the FFIEC. This chart provides you with median family income levels by MSA. Eighty percent of that figure is income level that a family must be living at or below to meet the definition of LMI (it is actually the top end of moderate-income, by definition). For areas of a state that are not identified here as an MSA, the ‘nonmetro’ portion of state figures appear beginning at the bottom of the 13<sup>th</sup> page.

**Example:** The Z Agency established a partnership agreement with N Bank to provide an IT training program to individuals in T City. The program is designed to be completed with job placements in businesses in T City. The Z Agency team consulted with the FFIEC web link and found the 2023 estimated family income median for T City was \$85,600. Eighty percent of this figure is \$68,400. Z Agency and their bank partner will use \$68,400 or more in income as the indicator of a successful impact of the project on participants.