NCUA Low-Income Designations

An Overview

On July 1st, the National Credit Union Administration ("NCUA") issued its first update to the Low-income Designation Area Workbook ("the Workbook") in over two years. *Table 1*, on the following page, summarizes the changes, state by state, and an in depth discussion of the changes and their implications follows. At a high level, the updates are:

1. The NCUA removed the Zip Code Qualification Test. Overall, this is a welcome change, as the test was more complicated than any other and often resulted in negligible increases in the overall qualification rate.
2. In large measure, the removal of the Zip Code Test was cured by the addition of more qualifying geographies for the other tests. Overall, the percentage of the U.S. population qualifying as low-income increased from 54.7% to 57.9%,[1] which should result in a slightly lower qualification hurdle for low-income credit union ("LICU") status. How much easier is difficult to say since the Workbook is not a perfect representation of the NCUA internal methodology.
3. This increase in qualifying geographies was not shared evenly among states.

   a. Twenty-one states and the District of Columbia continue to have fewer than 50% of their residents qualifying as low-income, with Connecticut being the lowest at just 34.6%. Connecticut was also the only state that saw an overall decrease in the percentage of the population considered low-income.

   b. Of the remaining twenty-nine states with over 50% qualification, West Virginia continues to have the highest qualification rate at 83.6% of its population. Puerto Rico has a 100% qualification rate, just as it did in the previous version.
4. The addition of counties to low-income designation can often define a credit union's ability to qualify. The most notable counties added to the low-income designation in the Workbook include: Prince Georges County, MD (population 947,000); Hays County, TX (population 280,000); Erie County, PA (population 267,000); Tuscaloosa County, AL (population 237,000); and Bay County, FL (population 190,000). No counties were removed from low-income qualification.

Overall, we welcome these changes from the NCUA and believe an update to the Workbook was necessary given the availability of updated Census Bureau data. Historically, credit unions have done a better job of reaching low-income customers than banks. And we believe strongly that credit unions should be incentivized to continue doing so. Our data also suggests that LICUs represent a stronger cohort than the overall credit union industry, in large measure, due to the additional regulatory relief provided by the low-income designation. Therefore, to the extent this update mirrors the changes to the internal NCUA methodology, it represents an important step toward a stronger credit union system.

[1] Note that these numbers are based on the estimated populations reported in the 2022 American Community Survey 5-Year Results. All percentages in this paper should be treated as estimates.

	Total Low-Income Population	Gain (Decrease) in Low-Income Population*	% Change in Low-Income Population*	Total Population	% of Population Considered Low-Income
United States of America	**193,728,808**	**10,840,945**	**3.24%**	**334,369,975**	**57.94%**
Wyoming	283,529	42,963	7.43%	577,929	49.06%
Wisconsin	2,722,372	117,051	1.99%	5,882,128	46.28%
West Virginia	1,499,694	51,775	2.89%	1,792,967	83.64%
Washington	3,731,477	227,195	2.95%	7,688,549	48.53%
Virginia	4,499,306	295,882	3.43%	8,624,511	52.17%
Vermont	258,876	34,118	5.30%	643,816	40.21%
Utah	1,967,829	80,284	2.44%	3,283,809	59.93%
Texas	17,638,555	1,242,076	4.25%	29,243,342	60.32%
Tennessee	4,282,546	222,275	3.21%	6,923,772	61.85%
South Dakota	385,527	27,455	3.08%	890,342	43.30%
South Carolina	3,722,406	137,670	2.68%	5,142,750	72.38%
Rhode Island	487,452	28,109	2.57%	1,094,250	44.55%
Puerto Rico	3,272,382	-	0.00%	3,272,382	100.00%
Pennsylvania	6,570,657	417,570	3.21%	12,989,208	50.59%
Oregon	2,409,173	182,703	4.32%	4,229,374	56.96%
Oklahoma	2,420,752	156,744	3.95%	3,970,497	60.97%
Ohio	6,424,572	436,936	3.71%	11,774,683	54.56%
North Dakota	301,327	32,827	4.23%	776,874	38.79%
North Carolina	7,141,344	400,514	3.83%	10,470,214	68.21%
New York	11,167,644	533,469	2.67%	19,994,379	55.85%
New Mexico	1,571,743	57,905	2.74%	2,112,463	74.40%
New Jersey	3,971,294	238,833	2.58%	9,249,063	42.94%
New Hampshire	628,229	30,257	2.19%	1,379,610	45.54%
Nevada	1,667,173	108,320	3.49%	3,104,817	53.70%
Nebraska	821,201	73,796	3.77%	1,958,939	41.92%
Montana	628,371	66,091	6.05%	1,091,840	57.55%
Missouri	3,619,882	177,020	2.88%	6,154,422	58.82%
Mississippi	2,309,666	163,486	5.53%	2,958,846	78.06%
Minnesota	2,378,235	177,525	3.12%	5,695,292	41.76%
Michigan	6,160,028	258,042	2.57%	10,057,921	61.25%
Massachusetts	3,338,112	206,658	2.96%	6,984,205	47.80%
Maryland	3,433,833	491,687	7.98%	6,161,707	55.73%
Maine	583,359	25,947	1.90%	1,366,949	42.68%
Louisiana	3,667,774	236,774	5.10%	4,640,546	79.04%
Kentucky	3,012,433	280,458	6.23%	4,502,935	66.90%
Kansas	1,435,192	93,877	3.20%	2,935,922	48.88%
Iowa	1,455,905	157,493	4.94%	3,188,836	45.66%
Indiana	4,309,184	199,561	2.94%	6,784,403	63.52%
Illinois	6,197,289	332,909	2.61%	12,757,634	48.58%
Idaho	1,300,572	36,495	1.97%	1,854,109	70.15%
Hawaii	602,757	41,107	2.83%	1,450,589	41.55%
Georgia	6,701,866	450,216	4.20%	10,722,325	62.50%
Florida	15,841,040	647,272	2.99%	21,634,529	73.22%
District of Columbia	324,345	6,289	0.94%	670,587	48.37%
Delaware	486,160	7,940	0.80%	993,635	48.93%
Connecticut	1,249,012	(281,925)	-7.81%	3,611,317	34.59%
Colorado	2,689,977	177,737	3.08%	5,770,790	46.61%
California	21,577,251	1,115,439	2.83%	39,356,104	54.83%
Arkansas	2,251,220	130,338	4.32%	3,018,669	74.58%
Arizona	4,271,187	124,091	1.73%	7,172,282	59.55%
Alaska	315,093	9,155	1.25%	734,821	42.88%
Alabama	3,742,005	332,536	6.61%	5,028,092	74.42%

* Compared to 2022 NCUA Workbook. All data retrieved from the NCUA and Census Bureau

Table 1. Low-Income Qualification by State

"Overall, the percentage of the U.S. population qualifying as low-income increased from 54.7% to 57.9%,[1] which should result in a slightly lower qualification hurdle for low-income credit union ("LICU") status."

Understanding the NCUA Low-Income Area Designation Workbook

The NCUA Low-Income Area Designation Workbook is an incomplete guide to determining the low-income status of your credit union based on geography as defined in 12 CFR § 701.34.[2] While we will not go into detail here on the benefits of the low-income designation, it suffices to say the designation offers substantial regulatory relief and should be responsibly pursued by all credit unions that may qualify. To qualify, your credit union must demonstrate "a majority of its membership qualifies as low-income members."[3] This is often interpreted as "fifty percent of membership, plus one." The Workbook allows your credit union to estimate its low-income qualification without input from the NCUA.

First, a disclaimer. In a perfect world, the Workbook and methodology laid out on the NCUA resources page would allow credit unions to accurately replicate the analysis performed by the NCUA. However, having gone through this process a few dozen times, this is not the case. The NCUA explicitly states (emphasis mine), "[t]he workbook was created to assist credit unions in identifying low-income populations and to increase their outreach efforts to those communities. ***It is not designed to qualify a credit union for the low-income designation."*** [4] Note that this language was added with the July 2024 update to the Workbook. Previously, it said the Workbook could be used by credit unions in "at least two ways" and then listed the current version's two uses. It had no disclaimer about not being suitable for determining low-income designation.[5]

The NCUA's process is opaque, and we routinely find the numbers calculated via the Workbook and the numbers calculated by the NCUA are different. In fact, sometimes there is a drastic difference, though the NCUA is normally quite amenable to discussing discrepancies and working with credit unions (as much as is possible) to achieve the designation.

If you want to understand your credit union's relation to the low-income designation, ask the NCUA to run your numbers. This is the only way to get the "true" percentage.

That being said, the steps to use the Workbook are as follows:

1. **Data Collection** - Gather, for each member, the address of their primary residence. This cannot be a P.O. Box and all foreign addresses are immediately considered non-low income. This data should be derived from the AIRES Share File, though this file may require substantial cleaning prior to use. Single members with multiple accounts must be consolidated and corrections should be made where possible for improper data entry by members (e.g. a member's address is listed in "Mami" rather than "Miami").

[2] We refer to the Federal Credit Union Act in this discussion as most state-chartered credit unions are bound by the same rules via parity provisions.

[3] See 12 CFR § 701.34 (a)(1).

[4] See Low-Income Credit Union Designation, National Credit Union Administration (visited Jul. 17, 2024), available at https://ncua.gov/support-services/credit-union-resources-expansion/field-membership-expansion/low-income-credit-union-designation.

[5] See Low-Income Credit Union Designation, National Credit Union Administration (visited Feb. 24, 2024), available at https://web.archive.org/web/20240224040431/https://www.ncua.gov/support-services/credit-union-resources-expansion/field-membership-expansion/low-income-designation

2. **Geocoding** – All addresses must then be fed into a "geocoder." There are many of these services available (including one offered by the U.S. Census Bureau) and they take a street address and return a Federal Information Processing Series Code ("FIPS Code") describing the state, county (or equivalent), Census Tract, and Census Block of an address. FIPS Codes are fifteen digit numbers with the first two describing the state, the next three the county (or equivalent), the next six the Census Tract, and the final four the Census Block. The Workbook is concerned only with the left-most 12 digits; the state code, the county code, the tract code, and the block group code. Below, *Figure 1* shows the FIPS Code hierarchy and a sample 15-digit FIPS Code for the Olden Lane HQ.

3. **Qualification** – The FIPS Codes found in the previous step are then compared to the Workbook, starting with the county. The first five digits of the FIPS Code are compared to the list of qualifying counties found in the Workbook and any member with a primary residence in one of those counties qualifies. We then do the same with the first 11 digits and compare that to the tract list. Finally, the first 12 digits are compared to the block group list. Be wary of leading zeroes! The Workbook has all leading zeroes removed (e.g. Alabama is simply "1" rather than "01") though many geocoders return the code as the Census uses it, zeroes and all. All qualifying members can then be counted and compared to the total number of members to determine qualification.

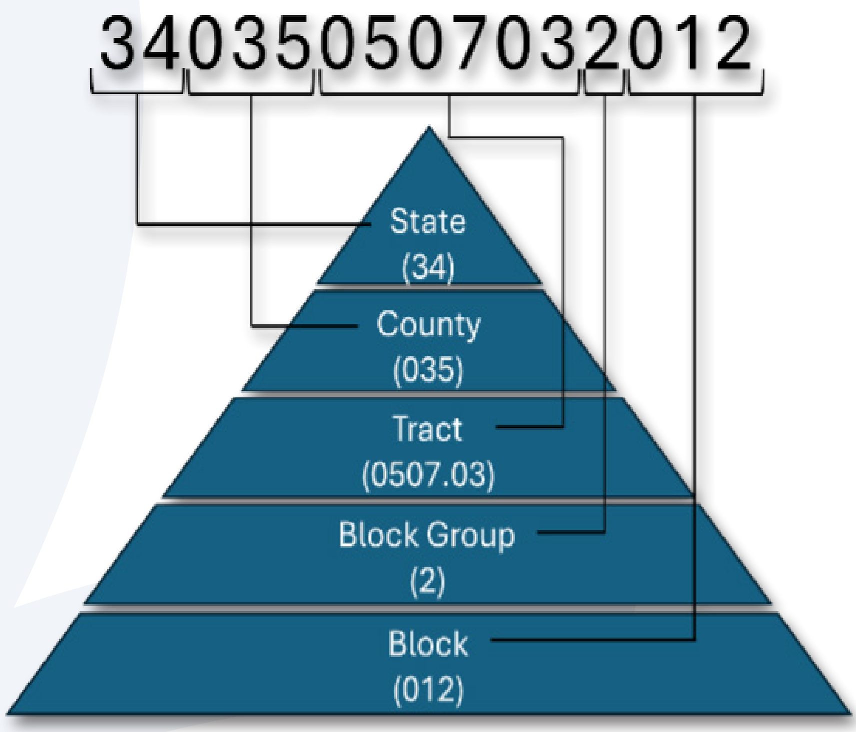

Figure 1. FIPS Code Hierarchy

Beyond the Workbook

To the final qualifying number found using the Workbook, you can then add any members who failed to qualify geographically but who are also students or active duty military, with some caveats. Note that these caveats are derived from experience and are not stated policy, as the NCUA is not forthcoming with this information.

If the credit union has ages for its members, it can qualify members as high school students between the ages of fourteen and eighteen but can only qualify them at the average rate of enrollment for the United States, normally around 90%. This same treatment does not apply to older members who may attend a college or university. For those members, your credit union must have an explicit indication the member is a student, such as a student account or an occupation listed as student on a loan form.

For active-duty military, the credit union again must have explicit indication via an occupation entry or loan product the member is active-duty military or an address as an APO or FPO (Army or Fleet Post Office). We find it is also helpful to look for the state codes “AA,” “AE,” and “AP,” standing for “Armed Forces America,” “Armed Forces Europe,” and “Armed Forces Pacific”. To these total number of members who are active duty military, the NCUA will then apply a factor that “will vary over time based on changes in median family income and periodic updates to the analysis of the income of military personnel.”[6] Since this analysis is unpublished and apparently regularly updated, we recommend discussing directly with the NCUA Office of Credit Union Resources and Expansion if your credit union expects to rely on this method of qualification.

Additionally, unlike the qualification of students as low-income, the qualification of active-duty military personnel as low-income is not made explicit in the Federal Credit Union Act, but rather comes from guidance issued by Former Chairman Rodney Hood and supported by analysis from the NCUA’s Office of Chief Economist. With the recent overturning of Chevron deference, we expect that an injured party (though we do not know who this would be) could challenge this method of qualification. The NCUA could also simply change its mind if pressured.

How Can Credit Unions Use the Workbook?

The NCUA stated purpose for the Workbook is “to assist credit unions in identifying low-income populations and to increase their outreach efforts to those communities.” To the extent the Workbook contributes to this mission, it would be at the county level. The ability to prioritize certain counties for increased marketing, membership drives, or addition to field of membership allows credit unions to better control their low-income designation rate. However, the inclusion of Census tracts and block groups does not greatly contribute to this mission. Tracts are, on average, areas of roughly 4,000 people while block groups contain just 1,300 people. To the extent that Tracts and Block Groups form large, continuous areas of qualifying people, they are targetable. However, when they act as islands of qualification, targeting them becomes infeasible. When people on one side of the street qualify and the other do not, targeted advertising takes on a new level of precision.

[6] See Low-Income Designations: Qualification of Military Personnel, National Credit Union Administration, Letter to Credit Unions 20-CU-16 (May 2020), available at *https://ncua.gov/regulation-supervision/letters-credit-unions-other-guidance/low-income-designations-qualification-military-personnel*

This is, however, a minor criticism. *Figure 2* shows the low-income designated areas of New York City and demonstrates how a credit union could use the workbook to increase qualification. The orange areas indicate two low-income counties, Bronx County and Kings County (Brooklyn), where a credit union could open branches and target outreach to boost its low-income designation and could be confident it is reaching qualifying members. The purple areas then show the qualifying Census Tracts and the blue areas the Block Groups. Where they form large groups, credit unions can target those areas, such as upper Manhattan and Queens. However, targeting the small groups of low-income members in Manhattan and on Staten Island would likely dilute low-income membership counts based on the surrounding potential membership. To the extent that credit unions serve low-income members in unhighlighted areas (and there are low-income members everywhere) they do not assist the credit union in qualifying.

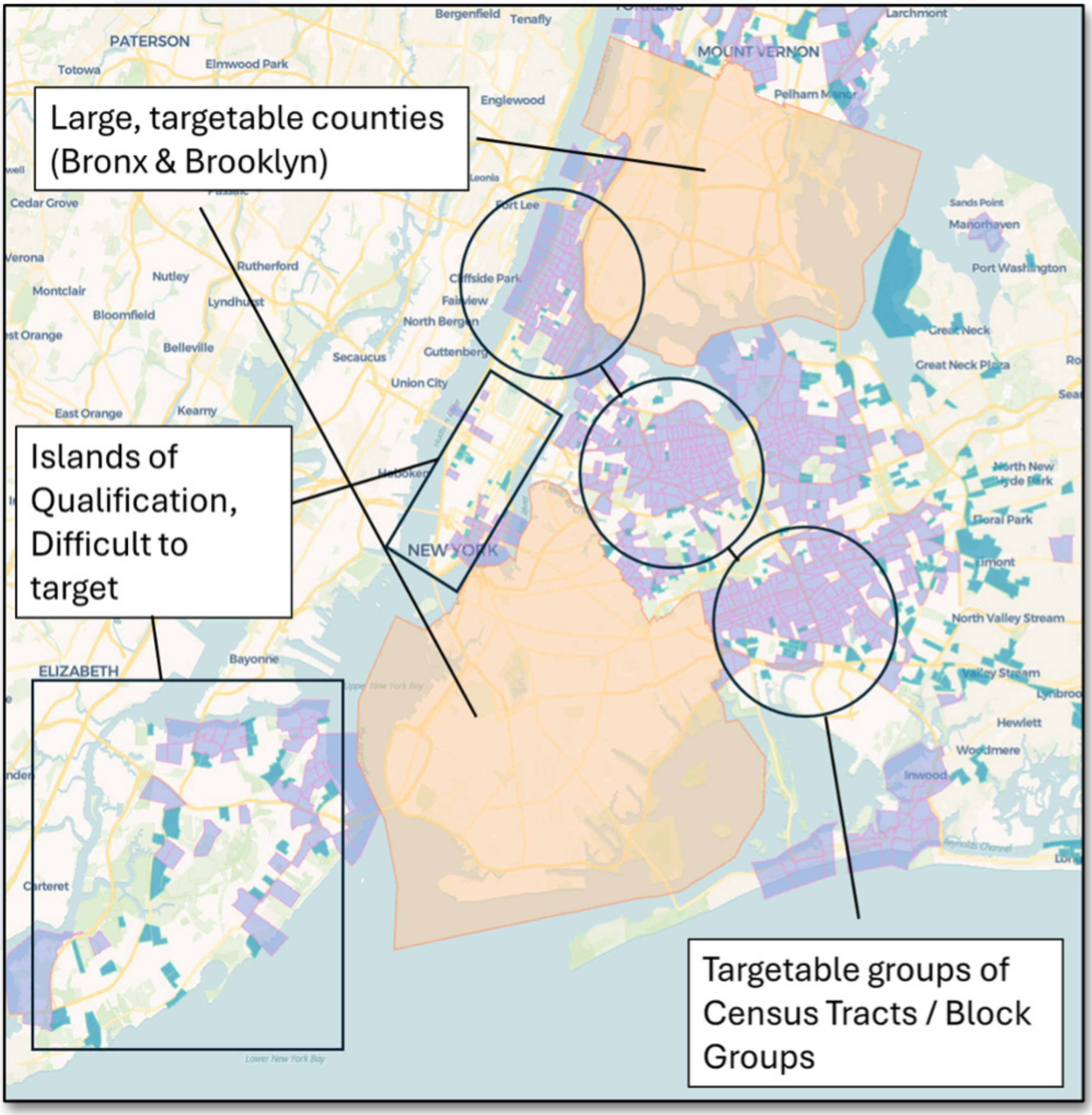

Figure 2. New York City Low-Income Designated Geographies

What Does it Mean for an Area to be Low-Income?

Within federal statute, low-income is defined as an individual, family, or household making less than 80% of the median individual, family, or household income for the given comparison level, where this comparison level can be the Metropolitan Statistical Area (for urban geographies), the state (for rural geographies), or the country as a whole (if this is greater than either of the other levels). In practice, the Census Bureau does not estimate individual incomes (though the IRS does report on it) and this is rarely used. Instead, median family income and median household income are the two standards, with 12 CFR § 701.34 specifying the use of median family income for the purpose of NCUA low-income designation.[7] If the median income for an area is less than 80% of the threshold for comparison, we can say that at least 50% of the population of that geography earns less than the median comparison amount and therefore there is a better-than-not chance the member living in this geography is low-income. *Table 2* shows the low-income threshold for each state and *Table 3* shows the thresholds for the fifty largest metropolitan areas in the United States.

Now, the NCUA does not officially publish its methodology for the creation of the Workbook, however, we assume that for a given level of geography (county, tract, or block group) the surveyed median income is compared to appropriate comparison group and a determination is made for each county, tract, and block group in the country. Attempting to recreate the Workbook is fraught with issues unless and until the NCUA publishes its own methodology (trust me, I've tried).

The most important aspect of the low-income determination is the deference to the greater of either the local median family income or the national median family income. The national median family income is $92,646, making the low-income threshold $74,116. By this measure, we can see that multiple entire states (AR, MS, NM and WV) are by definition low-income, though the NCUA does not make determinations of low-income status at the state level. Referring back to *Table 1*, these are four of the top six states by level of low-income qualification, which we would expect to see. This is also what allows the NCUA to create the statistical impossibility where over 50% of the country earns less than 80% of the median family income. By taking the more favorable number (which they are required by statute to do), the NCUA can use the high incomes of people in California to qualify people in Mississippi as low-income.

To be clear, the designation is a good system that allows the NCUA to quickly approximate the low-income membership of a credit union with minimal burden on the member. Additionally, the Emergency Capital Investment Program (ECIP) offers evidence credit unions do a better job reaching low-income borrowers than banks in general. The program gave over $8.57 billion to Community Development Financial Institutions (CDFIs) and Minority Depository Institutions (MDIs) as capital with the requirement they report on their lending to disadvantaged groups. The money went to both banks and credit unions. The results for calendar year 2023 show that recipients made 286,568 loans for $3,698,859,847 to low-income individuals, where the income used had to be reported by the borrower. Banks, despite making up over half the ECIP award amounts, made only 9.3% of the number of total loans made to low-income borrowers and only 13.2% by dollar amount. By contrast, credit unions accounted for a staggering 90.7% of the ECIP loans to low-income borrowers by number and 86.7% by dollar amount.[8]

[7] A family is defined as at least two people (one of whom is the householder) living together, related by birth, marriage, or adoption.

[8] Available at: https://home.treasury.gov/policy-issues/coronavirus/assistance-for-small-businesses/emergency-capital-investment-program

Though many goods have prices set on a national or close to national market, the laws of supply and demand almost necessitate that goods and services will cost more in areas with higher incomes, in particular housing. Table 4 shows the same data as Table 2, however, median yearly housing costs as a percentage of median family income is appended as the last column. Even in higher income states, the housing costs simply rise to make up the same percentage of total income. Additionally, the geographic system fails to take into account family size. What is a comfortable income for a couple with no children can be low-income for a couple with three children.

	Median Family Income	State Level Low-Income Treshold
Alabama	$ 77,363	$ 61,890
Alaska	$ 104,081	$ 83,265
Arizona	$ 86,737	$ 69,390
Arkansas	$ 71,437	$ 57,150
California	$ 105,010	$ 84,008
Colorado	$ 108,664	$ 86,931
Connecticut	$ 115,539	$ 92,431
Delaware	$ 97,743	$ 78,194
District of Colum	$ 142,328	$ 113,862
Florida	$ 81,514	$ 65,211
Georgia	$ 86,169	$ 68,935
Hawaii	$ 111,678	$ 89,342
Idaho	$ 83,640	$ 66,912
Illinois	$ 99,215	$ 79,372
Indiana	$ 84,657	$ 67,726
Iowa	$ 90,921	$ 72,737
Kansas	$ 89,535	$ 71,628
Kentucky	$ 76,273	$ 61,018
Louisiana	$ 74,911	$ 59,929
Maine	$ 89,012	$ 71,210
Maryland	$ 120,081	$ 96,065
Massachusetts	$ 122,530	$ 98,024
Michigan	$ 87,221	$ 69,777
Minnesota	$ 107,072	$ 85,658
Mississippi	$ 67,731	$ 54,185
Missouri	$ 84,745	$ 67,796
Montana	$ 84,027	$ 67,222
Nebraska	$ 92,614	$ 74,091
Nevada	$ 85,584	$ 68,467
New Hampshire	$ 113,605	$ 90,884
New Jersey	$ 119,240	$ 95,392
New Mexico	$ 72,422	$ 57,938
New York	$ 100,846	$ 80,677
North Carolina	$ 82,890	$ 66,312
North Dakota	$ 100,188	$ 80,150
Ohio	$ 86,508	$ 69,206
Oklahoma	$ 77,160	$ 61,728
Oregon	$ 94,277	$ 75,422
Pennsylvania	$ 93,685	$ 74,948
Rhode Island	$ 104,033	$ 83,226
South Carolina	$ 79,830	$ 63,864
South Dakota	$ 88,996	$ 71,197
Tennessee	$ 80,258	$ 64,206
Texas	$ 87,594	$ 70,075
Utah	$ 100,001	$ 80,001
Vermont	$ 97,153	$ 77,722
Virginia	$ 107,504	$ 86,003
Washington	$ 108,285	$ 86,628
West Virginia	$ 71,678	$ 57,342
Wisconsin	$ 92,974	$ 74,379
Wyoming	$ 92,028	$ 73,622
Puerto Rico	$ 29,240	$ 23,392

Table 2. Median Family Income and Low-Income Threshold by State

	Population		Median Family Income		MSA Level Low-Income Threshold
New York-Newark-Jersey City, NY-NJ-PA Metro Area	19,908,595	$	113,844	$	91,075
Los Angeles-Long Beach-Anaheim, CA Metro Area	13,111,917	$	101,056	$	80,845
Chicago-Naperville-Elgin, IL-IN-WI Metro Area	9,566,955	$	106,055	$	84,844
Dallas-Fort Worth-Arlington, TX Metro Area	7,673,379	$	99,957	$	79,966
Houston-The Woodlands-Sugar Land, TX Metro Area	7,142,603	$	92,750	$	74,200
Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area	6,346,083	$	144,539	$	115,631
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metro Area	6,232,894	$	108,977	$	87,182
Miami-Fort Lauderdale-Pompano Beach, FL Metro Area	6,123,949	$	80,554	$	64,443
Atlanta-Sandy Springs-Alpharetta, GA Metro Area	6,094,752	$	98,569	$	78,855
Boston-Cambridge-Newton, MA-NH Metro Area	4,912,449	$	134,646	$	107,717
Phoenix-Mesa-Chandler, AZ Metro Area	4,864,209	$	93,191	$	74,553
San Francisco-Oakland-Berkeley, CA Metro Area	4,692,242	$	154,003	$	123,202
Riverside-San Bernardino-Ontario, CA Metro Area	4,610,050	$	90,585	$	72,468
Detroit-Warren-Dearborn, MI Metro Area	4,375,604	$	93,779	$	75,023
Seattle-Tacoma-Bellevue, WA Metro Area	4,001,701	$	127,870	$	102,296
Minneapolis-St. Paul-Bloomington, MN-WI Metro Area	3,678,328	$	119,274	$	95,419
San Diego-Chula Vista-Carlsbad, CA Metro Area	3,289,701	$	111,734	$	89,387
Tampa-St. Petersburg-Clearwater, FL Metro Area	3,194,310	$	84,454	$	67,563
Denver-Aurora-Lakewood, CO Metro Area	2,959,386	$	119,980	$	95,984
Baltimore-Columbia-Towson, MD Metro Area	2,840,005	$	118,479	$	94,783
St. Louis, MO-IL Metro Area	2,813,523	$	97,901	$	78,321
Orlando-Kissimmee-Sanford, FL Metro Area	2,679,298	$	83,343	$	66,674
Charlotte-Concord-Gastonia, NC-SC Metro Area	2,668,688	$	93,744	$	74,995
San Antonio-New Braunfels, TX Metro Area	2,570,862	$	85,469	$	68,375
Portland-Vancouver-Hillsboro, OR-WA Metro Area	2,505,312	$	110,489	$	88,391
Sacramento-Roseville-Folsom, CA Metro Area	2,394,673	$	106,925	$	85,540
Pittsburgh, PA Metro Area	2,365,501	$	96,434	$	77,147
Austin-Round Rock-Georgetown, TX Metro Area	2,296,377	$	115,204	$	92,163
Las Vegas-Henderson-Paradise, NV Metro Area	2,265,926	$	82,358	$	65,886
Cincinnati, OH-KY-IN Metro Area	2,253,528	$	97,826	$	78,261
Kansas City, MO-KS Metro Area	2,190,750	$	99,766	$	79,813
Columbus, OH Metro Area	2,137,223	$	97,262	$	77,810
Indianapolis-Carmel-Anderson, IN Metro Area	2,109,957	$	93,688	$	74,950
Cleveland-Elyria, OH Metro Area	2,079,759	$	90,488	$	72,390
San Juan-Bay-Caguas, PR Metro Area	2,073,546	$	32,322	$	25,858
Nashville-Davidson--Murfreesboro--Franklin, TN Metro Ar	1,990,873	$	96,905	$	77,524
San Jose-Sunnyvale-Santa Clara, CA Metro Area	1,981,584	$	172,303	$	137,842
Virginia Beach-Norfolk-Newport News, VA-NC Metro Area	1,798,025	$	95,214	$	76,171
Providence-Warwick, RI-MA Metro Area	1,670,949	$	103,773	$	83,018
Jacksonville, FL Metro Area	1,613,587	$	88,994	$	71,195
Milwaukee-Waukesha, WI Metro Area	1,568,940	$	97,232	$	77,786
Oklahoma City, OK Metro Area	1,428,923	$	84,302	$	67,442
Raleigh-Cary, NC Metro Area	1,420,825	$	113,293	$	90,634
Memphis, TN-MS-AR Metro Area	1,335,804	$	78,701	$	62,961
Richmond, VA Metro Area	1,316,145	$	104,391	$	83,513
Louisville\/Jefferson County, KY-IN Metro Area	1,282,588	$	88,819	$	71,055
New Orleans-Metairie, LA Metro Area	1,264,357	$	81,500	$	65,200
Salt Lake City, UT Metro Area	1,254,675	$	106,248	$	84,998
Hartford-East Hartford-Middletown, CT Metro Area	1,215,703	$	115,967	$	92,774

Table 3. Population, Median Family Income, and Low-Income Threshold for 50 most-populous Metro Areas

	Median Family Income		State Level Low-Income Treshold		Median Monthly Housing Cost % of Median Family Income
Alabama	$	77,363	$	61,890	13.79%
Alaska	$	104,081	$	83,265	16.64%
Arizona	$	86,737	$	69,390	17.31%
Arkansas	$	71,437	$	57,150	13.94%
California	$	105,010	$	84,008	22.25%
Colorado	$	108,664	$	86,931	17.97%
Connecticut	$	115,539	$	92,431	17.02%
Delaware	$	97,743	$	78,194	15.96%
District of Columl	$	142,328	$	113,862	16.90%
Florida	$	81,514	$	65,211	19.34%
Georgia	$	86,169	$	68,935	16.91%
Hawaii	$	111,678	$	89,342	20.23%
Idaho	$	83,640	$	66,912	15.71%
Illinois	$	99,215	$	79,372	15.53%
Indiana	$	84,657	$	67,726	13.88%
Iowa	$	90,921	$	72,737	12.97%
Kansas	$	89,535	$	71,628	13.89%
Kentucky	$	76,273	$	61,018	14.18%
Louisiana	$	74,911	$	59,929	15.06%
Maine	$	89,012	$	71,210	14.59%
Maryland	$	120,081	$	96,065	17.07%
Massachusetts	$	122,530	$	98,024	17.75%
Michigan	$	87,221	$	69,777	14.32%
Minnesota	$	107,072	$	85,658	14.51%
Mississippi	$	67,731	$	54,185	14.51%
Missouri	$	84,745	$	67,796	14.06%
Montana	$	84,027	$	67,222	14.35%
Nebraska	$	92,614	$	74,091	13.88%
Nevada	$	85,584	$	68,467	19.43%
New Hampshire	$	113,605	$	90,884	16.49%
New Jersey	$	119,240	$	95,392	18.30%
New Mexico	$	72,422	$	57,938	15.28%
New York	$	100,846	$	80,677	18.53%
North Carolina	$	82,890	$	66,312	15.64%
North Dakota	$	100,188	$	80,150	11.25%
Ohio	$	86,508	$	69,206	13.87%
Oklahoma	$	77,160	$	61,728	14.37%
Oregon	$	94,277	$	75,422	18.30%
Pennsylvania	$	93,685	$	74,948	14.55%
Rhode Island	$	104,033	$	83,226	16.74%
South Carolina	$	79,830	$	63,864	14.97%
South Dakota	$	88,996	$	71,197	12.84%
Tennessee	$	80,258	$	64,206	15.03%
Texas	$	87,594	$	70,075	17.33%
Utah	$	100,001	$	80,001	16.87%
Vermont	$	97,153	$	77,722	15.95%
Virginia	$	107,504	$	86,003	16.38%
Washington	$	108,285	$	86,628	18.33%
West Virginia	$	71,678	$	57,342	11.82%
Wisconsin	$	92,974	$	74,379	14.11%
Wyoming	$	92,028	$	73,622	13.35%
Puerto Rico	$	29,240	$	23,392	16.05%

Table 4. Median Family Income Compared to Housing Costs

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