

Memorandum
Numbered Memorandum 10-07

To: Public Housing and Housing Choice Voucher Staff
From: James Gurke, Director, Public Housing
By Catherine Stone, Director Housing Operations
Date: February 5, 2010
Subject: Interim Reexamination Guidance

Central Office introduced the Interim Reexamination policy by Numbered Memo 09-33 on December 4, 2009. This memo will update and finalize the interim policy after much discussion with staff. Please note: These changes do not affect Section 8 New. Interim policies for that program are governed by the HUD 4350.3 Handbook.

Per Board Resolution on April 23, 2009, AHFC amended its interim reexamination policy for public housing tenants and Housing Choice Voucher participants. Except for the exemptions outlined in numbers 1, 2, and 3 below, AHFC does not require an interim reexamination of family income for new employment or increases in earned or unearned income that occur between the required annual reexaminations.

- A. Participants report an increase in earned income following a rent decrease. (*Interim required.*)
- B. Participants who fail to meet the minimum income threshold report increases in earned or unearned income. (*Interim required.*)
- C. Increases in family income because a person with income joins the household. (*Interim required.*)
- D. Any time the participant requests one for: (a) decreases in income that will last more than 30 days; (b) increases in medical or child care expenses.
- E. Entry into the Family Self Sufficiency program or an increase in income by a FSS participant to build their escrow.

Families must continue to report all changes in income and family composition within ten (10) business days of the occurrence. All income is included at the annual reexamination and/or when HCV participants move.

What to consider to process an interim.

Except for PFD's, consider all the family income when a family reports that income has decreased. Normally, during an interim reexamination only the information affected by the reported changes will be reviewed and verified. In this instance, staff will verify the end of Bob's job and accept Samantha's self declaration of income, to avoid a minimum rent situation when the family has countable income.

- 1) At the February annual reexamination, Bob reports wages of \$12,000, Samantha has no income. The family rent is based on the family income of \$12,000.



- 2) In March, Samantha reports a job earning \$15,000. The family income has increased to \$27,000 (\$12,000 + \$15,000). There has been no decrease in family income; no interim increase will be processed. The rent is still based on the family income of \$12,000.
- 3) In June, Bob reports that he has lost his job. Staff will consider ALL the available family income. Countable family income is now \$15,000. Processing an interim at this point will increase the family rent. Bob may request that we do NOT process the interim now.
- 4) In August, Bob reports a job earning \$30,000. The family income has increased to \$45,000. There has been no decrease in family income; no interim increase will be processed.
- 5) In February, all income will be considered and the rent is based on the family income of \$45,000.

What to consider when a client fails to meet the minimum income threshold:

The minimum threshold is the GREATER amount of \$1,200 per person per year OR the most recent PFD per person.

- 1) At his annual in February, Clancy (who lives alone) reported a PFD of \$1,305 as income. The amount of \$1,305 is a greater amount than the amount of \$1,200 per year. Conduct minimum income reviews every 90 days per policy.
- 2) In March, Clancy reports that he received IA for \$180 per month. Conduct an interim to add \$180 x 12 to his income.
- 3) Discontinue conducting minimum income reviews every 90 days.

What to consider when a person with income joins the household.

Conduct an interim review. Include the new person's income to compute the family income and adjust the rent portion accordingly. During an interim reexamination only the information affected by the reported changes will be reviewed and verified.

- 1) At his annual in February, Harvey reports living alone with his 2 kids earning \$25,000.
- 2) In March, Cujo moves with annual wages of \$30,000. The family income is now \$55,000 (\$25,000 + \$30,000). Conduct an interim increase in the family rent.
- 3) In June, Clancy reports that Harvey moved out, leaving Cujo with custody of the children. The family income is now \$30,000 family. Conduct an interim decrease in the family rent.
 - a) In August, Cujo reports a raise to \$35,000. Conduct an interim to increase the family rent because a previous rent decrease was processed.

Should you have questions about the policy, please direct them to Genie Borgford.

