



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Charles D. Baker, Governor ♦ Karyn E. Polito, Lt. Governor ♦ Jennifer D. Maddox, Undersecretary

To: LHA and RAA Executive Directors Administering State Rental Assistance
From: Brendan Goodwin, Director, Division of Rental Assistance
Subject: Calculating Participant Income During COVID-19 Q&A (Revised)
Date: May 12, 2020

ADDENDUM – Policy Question & Answer

This notice answers several questions on the implementation of the May 11, 2020 guidance for all state rental assistance program (AHVP, DMHRSP, and MRVP) entitled “Calculating Participant Income During COVID-19 (Revised)” and associated regulatory waivers. This temporary policy includes the following principles:

- This policy only extends through July 31, 2020.
 - It is important to remember that in MRVP most increases in earned income are not counted until the next annual recertification (see pages 183-184 of the [MRVP Administrative Plan](#)).
- Participants may request an interim redetermination when income falls in order to reduce tenant rent share at any time.
- Participants are still obligated to report all changes in income and/or household composition, to the extent required by individual program rules.
- If an AA has made a retroactive change to tenant rent share based on policy issued by DHCD, additional subsidy payments shall be made to the property owner who must then refund or credit the participant.
 - Note that tenant rent share may never be raised retroactively.
 - See page 216 of the [MRVP Administrative Plan](#) for general information on retroactive tenant rent share changes.
- AAs must give participants at least 30 days’ written notice prior to increasing tenant rent share.

If you have any questions, comments, or concerns, please do not hesitate to contact Cecilia Woodworth, Assistant Director of State Programs, at cecilia.woodworth@mass.gov.

RENT POLICY Q&A

1. **Question:** *A household's regular annual recertification was effective April, May, June, or July 1. The household's earned income has increased since March 1, 2020. When should the increased earned income be counted towards tenant rent share?*

Answer: **Until July 31, 2020, unless a household is zero income, all increases in earned income that occurred after March 1, 2020 shall not be counted until the next annual recertification.** For households whose annual recertification is April, May, June, or July 1 and had an increase in earned income, increased earned income shall not be counted until their next annual recertification in 2021.

2. **Question:** *A household reported an increase in earned income that occurred after March 1. When should the increase in income be counted?*

Answer: **Until July 31, 2020, unless a household is zero income, all increases in earned income that occurred after March 1, 2020 shall not be counted until the next annual recertification.** It is important to remember that in MRVP most increases in earned income are not counted until the next annual recertification (see pages 183-184 of the [MRVP Administrative Plan](#)).

3. **Question:** *A household that had zero income prior to March 1 began working since March 1, 2020. When should this new earned income be counted, and their tenant rent share increased?*

Answer: **For zero income households, increases in earned income shall be counted as soon as possible.** AAs must give participants at least 30 days' written notice prior to increasing tenant rent share.

4. **Question:** *A participant added a household member with earned income to their household after March 1, 2020. When should tenant rent share be increased due to changes in household composition?*

Answer: **Until July 31, 2020, unless a household is zero income, all increases in earned income that occurred after March 1, 2020 shall not be counted until the next annual recertification. **This policy applies to households who experience an increase to earned income due to a change in household composition.** Increases in income due to changes in household composition shall be at the next annual recertification.**

5. **Question:** *A participant relocated and signed a new lease between since March 1, 2020. This household also had an increase to their earned income since March 1, 2020 that the AA had not been counting. Should increases to earned income be considered at recertification due to relocation?*

Answer: **If a household has a recertification due to relocation, all earned income shall be counted. FPUC shall continue to be counted as outlined in DHCD's May 11, 2020 guidance.**

6. **Question:** *Are AAs to assume that a now unemployed participant is receiving the enhanced unemployment benefit of \$600 per week (FPUC)? a. Is it the responsibility of that participant to report the enhanced benefit to the AA? b. If they do not report it, should the AA reach out to the participant requesting confirmation?*

Answer: AAs should not assume that a participant is receiving the \$600 FPUC benefit just because they are receiving unemployment or because they lost earned income. It is the responsibility of the participant to inform the AA of all changes in income received by each member of the household. There is nothing that prohibits the AA from asking the participant if they are receiving the FPUC payment.

7. **Question:** *Is DHCD working to arrange for AAs to receive electronic verification of other income such as: (i) child support received through the Department of Revenue; (ii) Department of Transitional Assistance cash benefits; and/or (iii) unemployment benefits?*

Answer: DHCD is not working on this at this time. Guidance will be issued to AAs regarding verification of income, exclusions and deductions soon.