EAP Income Eligibility Determination and Calculation Training

PY 2024

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AGENDA

- 1. Income Eligibility Determination Fundamentals
- 2. Available Tools
- 3. Documentation
- 4. Sources of Income
- 5. General Reminders and Takeaways



PURPOSE OF TRAINING

The purpose of this training is to provide an overview of the income eligibility determination fundamentals and to provide instruction on calculation methods.

AGENDA

- 1. Income Eligibility Determination Fundamentals
- Available Tools
- 3. Documentation
- 4. Sources of Income
- 5. General Reminders and Takeaways



For PY 2024, IHCDA is continuing with an eligibility model in which we use **60%** of State Median Income for all households, regardless of size. Under the previous model, we used a hybrid threshold in which we considered 60% of SMI until it was outpaced by the 150% of Federal Poverty Guidelines limit.

 Historically, this switch has occurred somewhere between a household size of 8 and 10.



With this year's numbers, 150% FPG outpaces 60% SMI once the household size reaches 9.

HH size	60% SMI	150% FPL				
1	\$ 29,755	\$ 21,870.00				
2	\$38,911	\$ 29,580.00				
3	\$48,067	\$ 37,290.00				
4	\$57,223	\$ 45,000.00				
5	\$ 66,378	\$ 52,710.00				
6	\$ 75,534	\$ 60,420.00				
7	\$77,251	\$ 68,130.00				
8	\$ 78,967	\$ 75,840.00				
9	\$80,684	\$ 83,550.00				
10	\$82,401	\$ 91,260.00				
11	\$84,117	\$ 98,970.00				
12	\$85,834	\$106,680.00				



IHCDA is very interested in analyzing the continuing effects of this change, particularly in the effect it has on overall eligibility as opposed to impacting matrix points. IHCDA once again asks that LSPs try to monitor denials for households size 9 and above and report the household income to us so that we may determine whether this change has had an unintended consequence.



- When determining a household's income, the eligibility period shall be defined
 as either the three most recent complete months prior to the date of
 application, or the immediate 13 weeks preceding the date of application.
- The current month shall not be counted as part of the eligibility determination period except in very limited circumstances:
 - The household receives only fixed income (e.g., SSA-administered benefits) and has already received their benefits for the month of application, and can expect to receive no more income.
 - It is the last day of the month, rendering the current month also a complete month.
 - The household member's pay schedule is such that they can reasonably expect to receive no further income for the remainder of the month, and providing additional documentation would be burdensome for the applicant.



- Example: It is November 22. A household of three presents as one adult receiving SSI, one adult receiving wages for employment, and one child. The adult with employment presents a check stub for November 18th.
 - If the employed adult's check stub indicates that they are paid on a two-week pay period, the next paycheck would be received December 04. The applicant states they no longer have access to the October 22nd paystub. In this instance, it is acceptable to count November as a complete month and use September, October, and November income.
 Rationale for counting November as a complete month must be noted in the case file.
 - If the employed adult's check stub indicates they are paid on a one-week pay period, then the adult will receive another paycheck on November 25th. November is not a complete month of income. Intake must either use August, September, and October income, or count 13 weeks of income from the date of application.
- Because using 3 complete months and 13 previous weeks should yield comparable results, IHCDA is removing previous guidance stating that in households with mixed income sources, the same income eligibility period must be used for the entire household. This will give LSPs greater flexibility.



Why were these changes made?

- Simplicity/streamlining
- Consistency across state
- Equity
- Reduced burden for applicants and LSP intake



AVAILABLE TOOLS

IHCDA is trying to make tools available to you to facilitate and reduce the burden of income calculation. We strongly encourage all subgrantees to train their intake to the use of **all** these tools.

- Excel workbook for 13-week employment income calculator
- EAPConnect onboard calculator (pending update)
- Excel workbook for other income calculation types, developed, maintained, and distributed by your peers in the network (but not an official IHCDA product)

Our goal is that subgrantees should feel confident in their income calculations and accuracy of benefit determination, and that monitoring findings for income calculations are eliminated.

We welcome feedback and suggestions!



AVAILABLE TOOLS

Benefits of using Income Calculation Spreadsheets and other tools for calculating income:

- Help to eliminate mathematical errors
- Provide a clear picture of how the income is calculated
- Easy to double check to verify that income is entered correctly
- Show the monitor how the calculations were figured
- Reduce errors in how crisis is calculated



DOCUMENTATION

- If intake uses an Excel spreadsheet to calculate income, that spreadsheet should be scanned or saved and uploaded into the client file to show the calculation.
- In most cases, the manual lists acceptable forms of income for different income sources in order of preference. Whenever a less-preferred form of documentation is accepted, intake shall note in the applicant file why the more-preferred forms were unavailable.
- Income Verification Affidavits should only be accepted as a last resort. For employment income, as an example, a Request for Earnings shall be attempted before accepting an Income Verification Affidavits.



DOCUMENTATION

- Income is always calculated based on the date of application, not the date of application processing or completion date. For instance, if an application is received on December 13, but not processed until February 1, the income eligibility period will be determined based on the application date of December 13.
- As long as income documentation is current as of the date of application, intake shall use the documentation submitted as part of the application without requesting updated information.
- In the example above, if the applicant submitted a two-week paystub dated December 03, the intake shall not request a paystub for January 28, since December 03 would have been the current paystub at the time of application. If the applicant turned in a paystub for November 05, however, intake may request a more current paystub or seek clarification that November 05 was the applicant's final pay with that employer.





QUESTIONS?



SOURCES OF INCOME

- Wages, Salary, tips, bonuses, and commissions
- Self employment
- Profits from a business
- Military Allotments (excluding combat zone pay)
- Disability payments from insurance
- Social Security, SSI
- Railroad retirement and Railroad disability benefits
- Black Lung Survivor benefits
- Income from rental property
- Life insurance payments
- Dividends, interest
- Gambling winnings, awards

- Pensions and Annuities
- Retirement plans
- Royalties
- Strike benefits
- Unemployment benefits
- Veteran benefits
- Regular life insurance payments
- Worker's compensation
- Alimony payments
- Irregular income/odd jobs
- Household support



FIXED INCOME SOURCES

Federally administered benefits (Examples: Social Security, SSDI, SSI, Railroad Retirement, VA benefits)

- May take current monthly amount and multiply by three to determine eligibility income.
- Exception: in January and February, if applicant presents a letter showing 2023 monthly benefit as well as 2024 benefit with COLA increase, intake should take care to apply the COLA rate to the appropriate months.
- For federally administered benefits **only**, intake should use the net amount after any withholdings and deductions rather than the gross benefit amount.



FIXED INCOME SOURCES

Non-federally-administered benefits (Examples: Pension, recurring payment retirement plans)

- May take current monthly amount and multiply by three to determine eligibility income.
- Our state plan states that we consider the gross amount of this income.
 Therefore, intake shall request a copy of the benefit award letter or a physical check stub showing the full benefit amount prior to withholdings or deductions, rather than a bank statement showing the net amount.



UNEMPLOYMENT BENEFITS

Unemployment benefits may be documented via a Last Known Employer (LKE) report obtained by the LSP from the Department of Workforce Development (DWD), or via an applicant's printout of their benefit status from the UpLink interface.

- If the applicant provides an UpLink report, we will require the full report with payment details. A screenshot of the current status is not sufficient.
- The full state-provided benefit must be considered along with any federal supplemental benefits.
- Amount for each week may be calculated by considering Gross Paid plus Total Withholdings.
- Processed Date shall be considered as opposed to Claim Date we are interested in when the payment was realized by the applicant.



SELF-EMPLOYMENT

Self-Employment can include profit or loss from a business, rental income, royalties, partnerships, S-corporations, estates, trusts, farming, or church employee income.

Because of the nature of self-employment income, it is calculated based on the most recent complete tax year. The income for the full year is divided by four to determine representative three-month income.

If the applicant's self-employment income was not present during the previous tax year, intake should attempt to obtain three months worth of receipts accompanied by an Income Verification Affidavit.

If the applicant does not file taxes for the self-employment income, it is to be considered **irregular or incidental income**, not self-employment.



SELF-EMPLOYMENT

To properly document self-employment income, the applicant must submit their entire previous-year Form 1040 tax return, including any applicable selfemployment schedules.

- Schedule 1 Additional Income and Adjustments to Income
 - Summarizes what kind of income is included in the return and indicates which other schedules should be considered.
- Schedule C Profit or Loss From Business
 - o Use line 5, Gross profit
- Schedule E Supplemental Income and Loss
 - Use line 3, Rents received, and/or line 4, Royalties Received
 - o For Partnerships and S Corporations, use line 32, Total partnership and S corporation income or loss.
 - o For Estates and Trusts, use line 37, Total estate and trust income or loss.
 - For Real Estate Mortgage Investment Conduits (REMICs), use line 39.
 - For Farm rental income or loss, use line 40.
- Schedule F Profit or Loss From Farming
 - Use line 9, Gross income.
- Schedule SE Self-Employment Tax
 - Use line 5a, Church employee income, from the Long Schedule SE if it is completed.



SELF-EMPLOYMENT

- On schedule C, we are now using line 5, gross profit, instead of line 7, gross income.
- We no longer add the value of a utility deduction to the income regardless of whether a business is run out of the home address.
- If the applicant's self-employment income is zero or shows a loss, record
 the income as zero. Do not enter a negative amount. Self-employed
 applicants do not have to follow procedures established for zero-income
 applicants, even if they show no income or a loss.



LSPs are **not** to use an LKE report to identify or determine employment history or income.

Employment income may be calculated using a pay stub or pay statement, a Request for Earnings Statement, or, if neither of these methods are feasible, an Income Verification Affidavit.

W-2s are, in general, usually not going to reflect the time period we are going to catch in the eligibility determination. Therefore, **W-2s are not considered** an acceptable document for employment income in most cases.

W-2s may be used **only** for applications submitted during the month of January, as long as the LSP is considering the three most recent complete months of income for the household.



If the paystub documentation discloses both year to date (YTD) gross wages and YTD federal taxable gross wages, intake is to use the federal taxable gross.

If the paystub documentation does not specify the federal taxable gross, intake is to use the gross amount. Intake may not calculate deductions on their own to attempt to determine federal taxable gross wages.

Federal taxable gross wages are also sometimes notated as FIT (federal income taxable) gross on some paystubs.

For the remainder of this presentation, any mention of gross wages or YTD gross wages shall be understood to imply federal taxable as the default if available.



To calculate income via the three most recent complete months:

- You must use the year to date (YTD) amount from the last paystub of the most recent complete month. (e.g., if an applicant applies on December 17, you will need to use the last paystub received in November).
- If the applicant provides the first paystub from the current month, it is acceptable to subtract the current gross pay from the YTD gross in order to determine the YTD gross at the end of the most recent complete month.
 - (e.g., if an applicant is on a two-week pay period, and they apply on December 17 with a December 10 paystub, you may subtract the current gross pay to determine what the YTD gross was on November 26, which would have been the last pay for November. However, if the applicant provides a December 17 paystub, subtracting the current gross would give you the YTD as of December 3, so you will need the December 3 or November 19 paystub.)



To calculate income via the three most recent complete months:

- Take YTD gross income from end of most recent complete month.
- Identify how many months are represented by the paystub. In general, this
 will usually correspond to the month of the paystub; i.e., November = 11
 months. If the applicant discloses that they began work after the beginning
 of the year, you will need to subtract any months for which no pay was
 received; i.e., if the applicant received their first paycheck in March, then
 January and February should be excluded. Therefore, 11-2=9 months.



- Once you determine how many months pay are in the check, divide the YTD gross by the number of months represented by the paystub to determine the representative monthly rate.
- Multiply the representative monthly rate by three to determine the employment income for the eligibility determination period.
- Note that if the applicant is no longer working and more than a month has passed since their last pay date, you may need to adjust the number of months you multiply by to account for zero-income months; i.e., if the applicant stopped working in October, and received zero income for November, and applies in December, you will only use two months of wages (September and October) and one month of zero income (November). Likewise, if an applicant applies in December and received their first pay in October, you will only use two months of wages (October and November) and one month of zero income for September.



EMPLOYMENT (SALARY/WAGES – 13 WEEK METHOD)

To calculate income using the 13-week method:

- Most recent available paystub is preferred, but you may use any paystub provided as long as it is within the 13-week eligibility window.
- Note whether pay period represents one week or two weeks.
- Determine the week number (out of 52) represented by the pay date on the check. For our purposes, a week is counted each time a Friday falls.
 - If the pay period is two weeks, you will need to round this value up if it is an oddnumbered week.
 - If the applicant started working after the beginning of the calendar year, try to determine when their first pay occurred. Determine the week number of this pay date, subtract 1, then subtract it from the pay date week number.



- Divide the YTD Federal Taxable Gross or YTD Gross by the number of weeks represented on the paycheck. This will give you the representative mean weekly amount.
- Multiply the representative weekly amount by 13. This will give you the eligibility determination period income.
- If the applicant is no longer working at the job, you will need to determine how many weeks have passed since the last pay and adjust the multiplier accordingly. For instance, if the last pay was 4 weeks prior to application date, multiply the representative weekly amount by 9 and count 4 weeks as zero income.
- Similarly, if the applicant has not been working at this job the entire past 13 weeks, you will need to determine how many potential pay weeks were not included and subtract that from 13 to determine the multiplier.



- •Example: Ash Williams worked as a sales clerk at S-Mart. Ash applies for EAP on April 15, 2024. Ash provides a paystub from March 08, 2024. Ash explains that that was his last pay, and that he no longer works at S-Mart. Ash's paystub shows that his YTD gross was \$6,000, and that he was paid according to a one-week pay period.
 - •March 08 represents the 10th week of the year. Therefore, \$6,000 divided by 10 weeks equals a mean weekly income of \$600.
 - •Since Ash has not received pay since March 08, we must determine how many weeks to offset the 13-week multiplier by. Because his pay was weekly, we must account for 5 weeks: March 15, March 22, March 29, April 05, and April 12.
 - •Therefore, we can determine that we are to count eight (8) weeks of this employment income for Ash (13-5=8).
 - •During the income eligibility period, Ash received \$4,800 income from S-Mart.
 - •An IVA is not required for the month of April because it is not a complete month.



We know that the 13-week method is complicated and unwieldy for an intake staff to calculate by hand! This is why we have developed a spreadsheet to automate this calculation with some simple data entry.

IHCDA has reviewed challenges that existed with the workbook during PY2023 and has made changes that we believe will result in these issues no longer being a problem. We have also proactively tested both the 2023 and 2024 worksheets, and it appears to work as intended. IHCDA strongly encourages all subgrantees to adopt this spreadsheet and ensure their intake staff are trained on its use.



Earned Income Calculation Worksheet - PY2024

2024 Paystub

Household Membe	er:	Ash Williams			Application Key:		8675309		
Employer:		S-Mart			Application Date:		4/15/2024		
Check Date:		3/8/2024			Worked from January 1?		Yes		
Pay Period length: 1			If no, approx. first pay?						
YTD Gross Income:) Gross Income: \$		6,000.00	6,000.00		Still working?			
	1/15/		- 4/15/2024		Eligibility Pay:	1/15/2024	-	3/8/2024	
YTD Dates:	1/1/2	023	- 3/8/2024						
YTD Weeks:	10	Eligibility Weeks: 8							
Mean Weekly Gros	s:	\$	600.00		Total Eligibility	Income:	\$	4,80	00.00



REQUEST FOR EARNINGS STATEMENT

Request for Earnings Statement is a form that may be used to get wage information directly from an employer when an applicant is unable to provide paystubs. It may also be helpful for applicants who are involved in gig work and have no concise report of aggregate earnings.

Because of the potential for falsification of this form, LSPs must obtain the applicant's release signature on the form and the employer's contact information and contact the employer directly to send them the form.



INCOME VERIFICATION AFFIDAVIT

The Income Verification Affidavit allows applicants to declare any irregular or incidental income, declare zero income for any month or all three months of the eligibility determination period, or, as a last resort, to declare employment income for which they have no other documentation, and documented attempts to obtain paystubs or a Request for Earnings Statement have failed.

Note that we are required to use gross income for employment, not net. Therefore, best practice is to verify an applicant's pay rate and average number of hours worked per week and document this. Ensure the figures provided on the IVA jibe with these.



INCOME VERIFICATION AFFIDAVIT

If an applicant declares zero income for any of the prior three months, the applicant must complete section two, explaining how they have met these financial needs while they had zero income. If they have declined to answer these questions, the IVA is incomplete and invalid.

If an applicant discloses in section two that they have received cash payments for household support made directly to them, this is to be counted as household income.



INCOME VERIFICATION AFFIDAVIT

This form is to be complet	ted by anyone claiming zo preceding application. Th	Income Verification Affida ero income or undocument his form must be complete lication Kev: /234567	nted income for a ed in its entirety.			form is to be comp three (3) month	nergy Assistance Prog leted by anyone claimi ns preceding applicatio INCEY GARUINGR	g zero incor n. This form	ne or undocu must be com	umente npleted	ed income for	y.
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2023 2023 2023 2023 2023 2023 2024 2024												
payments, dividends, interest, gambling win								STATE OF THE	and the latest to the	Settle: 1		
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is true and correct. I understand tha authorize state and federal agencies purpose.		and hereby consent to the release				re of Household Membe	dine	_/2 Date	19 1 202	3		
John Brook		02/08/24										
Signature of Household Member		Date										





QUESTIONS?



GENERAL TIPS AND REMINDERS

- It may help to chart the eligibility determination period for a particular file based on the application date and visualize the months being counted, especially if household members have worked multiple jobs. Remember that entering the application date onto the 13-week spreadsheet will calculate and display the income eligibility window for you.
- When looking at a bank statement, recurring payments are often marked PPD.
- Refunds (whether for store returns or bank fees) are not counted as income.
- If there are unexplained deposits on a bank statement, an intake worker should ask the applicant about them. If they are in the documentation, they are fair game and are subject to monitoring.



GENERAL TIPS AND REMINDERS

- Applicants may not redact or alter income documentation.
- Individual income amounts under \$1.00 do not need to be counted. For instance, monthly or quarterly interest earned on most applicants' bank accounts can most likely be disregarded.
- Try to simplify wherever you can. If you have a paystub where the YTD gross is equal to the current pay, you know that is a first pay stub at a new job. There is no need to do any math; just count all the income. Likewise, if you know somebody started a job within the past three months, document that and count the entire paystub as income, as it could not possibly count for more than three months.



GENERAL TIPS AND REMINDERS

- In general, the only reason to request a LKE report from DWD is for an applicant claiming unemployment income.
- That being said, if you have reason to believe an applicant is being deceptive, noncompliant, or potentially fraudulent, you have the right to request this report as part of your investigation.
- But remember: we are not detectives, and while we need to be cognizant
 of fraud, waste, and abuse, most clients are not trying to defraud the
 government. Most noncompliance stems from applicants not
 understanding the requirements or not realizing they need to claim certain
 pieces of income. Be open, transparent, and communicative, and be ready
 to educate and give second chances.
- We will talk more about this balance in a later module.



TAKEAWAYS

- Income calculation is a little bit of an art and a little bit of a science. Here at IHCDA, we are trying to tip the scales back to science and take away ambiguity for intake as well as for applicants.
- As a rule, income calculation can only be at best as good as the supporting documentation used for determination. This is why the use of less-preferred forms of documentation must be noted.





THANK YOU!

