# **EAP Income Eligibility Determination and Calculation Training**

PY 2025

Thomas Hartnett-Russell Community Programs Manager – EAP July 18, 2024



#### **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
- 2. Available Tools
- 3. Documentation
- 4. Sources of Income
- 5. General Reminders and Takeaways



For PY 2025, 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.





HH size	60% SMI	150% FPL	
1	\$ 32,237	\$ 22,590.00	
2	\$ 42,156	\$ 30,660.00	
3	\$ 52,075	\$ 38,730.00	
4	\$ 61,994	\$ 46,800.00	
5	\$ 71,913	\$ 54,870.00	
6	\$ 81,832	\$ 62,940.00	
7	\$ 83,692	\$ 71,010.00	
8	\$ 85,552	\$ 79,080.00	
9	\$ 87,412	\$ 87,150.00	
10	\$ 89,272	\$ 95,220.00	
11	\$ 91,132	\$103,290.00	
12	\$ 92,992	\$111,360.00	

With this year's numbers, 150% FPG outpaces 60% SMI once the household size reaches 10.



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 10 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 the **immediate 13 weeks** preceding the date of application.



Routinely requesting three complete months or thirteen complete weeks of documentation from applicant household members will result in monitoring findings.



#### **AVAILABLE TOOLS**

IHCDA provides you with tools to facilitate and reduce the burden of income calculation. Subrecipients must train their intake to the use of **all** these tools.

- Excel Workbook for 13-Week Earned Income Calculator
- EAPConnect onboard calculator

Our goal is that subrecipients should feel confident in their income calculations and accuracy of benefit determination, and that monitoring findings for income calculations are reduced or 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.
- If 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 November 05, the intake shall not request a paystub for December 03 or January 28. The November 05 paystub is valid because it is within 91 days of the application date. January 28 would not be a valid check stub since it is outside of the eligibility window.







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# What date is used to determine the income eligibility period?



#### What date is used to determine the income eligibility period?

Quiz question

☑ 63 answers 😂 63 participants

#### Application Processing Date - 2 answers

3%

Application Completion Date - 1 answer

2%

Date of Application - 58 answers



92%

Date the applicant signed the application - 2 answers

3%



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# What time period do we consider for income when determining eligibility?



What time period do we consider for income when determining eligibility?

Quiz question 2 62 answers 3 62 participants

One year - 3 answers

5%

One month - 2 answers

3%

Six months - 2 answers

3%

One quarter - 55 answers

89%





#### **QUESTIONS?**



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# Audience Q&A Session

#### **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 2025, if applicant presents a letter showing 2024 monthly benefit as well as 2025 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**

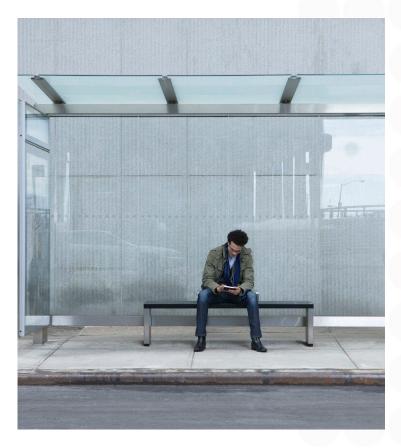
Non-federally-administered benefits (Examples: Pension, recurring payment retirement plans)

- 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.





#### **UNEMPLOYMENT BENEFITS**



If the applicant provides an UpLink report, we will require the full report with payment details. A screenshot of the status is not sufficient.

The full state-provided benefit must be considered along with any federal supplemental benefits.

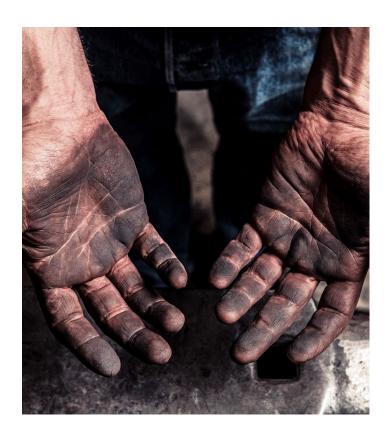


Amount for each week may be calculated by considering Gross Paid plus Total Withholdings.

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 selfemployment income, it is to be considered **irregular or incidental income**, not selfemployment.



#### **SELF-EMPLOYMENT**

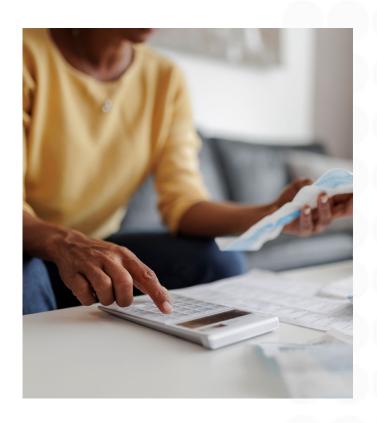
To properly document self-employment income, the applicant must submit their entire previous-year Form 1040 tax return, including any applicable selfemployment schedules.

- 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
  - Use line 5, Gross profit
- Schedule E Supplemental Income and Loss
  - Use line 3, Rents received, and/or line 4, Royalties Received
  - For Partnerships and S Corporations, use line 32, Total partnership and S corporation income or loss.
  - 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, one is to use 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. Selfemployed 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 needing for the eligibility determination. Therefore, **W-2s are not generally considered** an acceptable document for employment income in most cases.



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 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 salesclerk 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 10<sup>th</sup> 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 shall be requested for the month of April to show how Ash met his living expenses without income. The IVA does not need to address March, because Ask received income on March 08.



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.

Excel Workbook for 13-Week Earned Income Calculator

We have proactively tested the 2025 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.



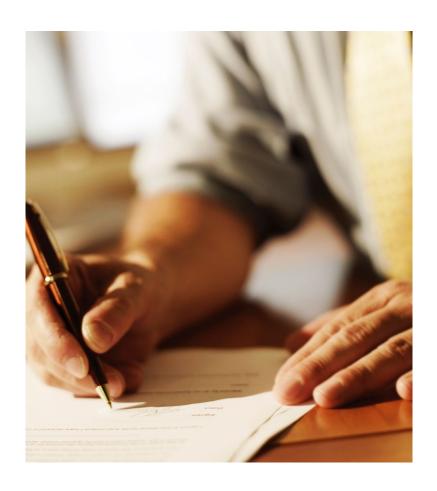
#### Earned Income Calculation Worksheet - PY2024

#### 2024 Paystub

Household Member:	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:	\$ 6,000.00	Still working?	No
Eligibility Dates: 1/	/15/2024 - 4/15/2024	Eligibility Pay: 1/15/2024	- 3/8/2024
YTD Dates: 1/1/2023 - 3/8/2024			
YTD Weeks: 10	)	Eligibility Weeks: 8	
Mean Weekly Gross:	\$ 600.00	Total Eligibility Income:	\$ 4,800.00



#### 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 complete three (3) months  Household Member: JOHN  Section 1: Complete for the three November, you must show income not have any documentation. Ent you must complete section 2. An The source of my income is:	BROOK Appreceding application. TI  BROOK App  2 (3) complete months immedia for August, September, and Octore zero (0) if you did not receively misrepresentation or omissions of the complete application of the complete applica	nis form must be complete lication Key: _/234967  tely before your application date ober. Please enter the gross ince income for a given month. If too may result in your application and the second of the second o	ated income for any din its entirety.  Application Date: 294  a. For example, if you apome received for which you enter 0 for any moon being denied.	bply in thy you do onth,	three (3) n Household Member:  Section 1: Complete for November, you must sho not have any document you must complete sect The source of my incom  S S May Jun 2023 J	the three (3) complete months immer in come for August, September, and thon. Enter zero (0) if you did not recon 2. Any misrepresentation or om 2 is:  S S S D O O O O O O O O O O O O O O O	zero income or undoct This form must be corr pplication Key: 123456 7  diately before your applicatio October. Please enter the greelve income for a given mor sision may result in your application  \$ 0 \$ \$ \$  Nov Dec Ja	mented income for any of the pleted in its entirety.  Application Date: 12/19/2023  In date. For example, if you apply in ass income received for which you do thin. If you enter 0 for any month, plication being denied.  \$
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# What forms of documentation cannot be used to calculate employment income?



What forms of documentation cannot be used to calculate employment income?

Quiz question 2 57 answers 3 57 participants

#### Pay Stub - 0 answers

0%

LKE (Last Known Employer) Report - 52 answers

91%

Request for Earnings Statement - 3 answers

5%

Income Verification Affidavit - 2 answers

4%





For what income types do we consider the most recent three full months of income instead of the most recent 13 weeks? (select all that apply)

<sup>(</sup>i) Start presenting to display the poll results on this slide.



For what income types do we consider the most recent three full months of income instead of the most recent 13 weeks? (select all that apply)

Quiz question 55 answers 55 participants

When the household member receives fixed income on a regular payment schedule. -54 answers



98%

An agency may decide whether to adopt three complete months or 13 weeks for all income types. - 6 answers

11%

Unemployment payments. - 20 answers

36%

When a household member with earned income is paid on a bimonthly fixed schedule.



- 31 answers

56%





When should intake request different income information from the applicant? (Select all that apply)

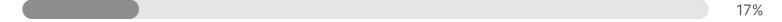
<sup>(</sup>i) Start presenting to display the poll results on this slide.



When should intake request different income information from the applicant? (Select all that apply)

Quiz question 2 54 answers 3 54 participants

The applicant submitted a pay stub from four weeks prior to the application date. - 9 answers



The applicant submits a pay stub dated five days after the date of their online application. - 44 answers



81%

The applicant submits a screenshot of their online pay portal. It is zoomed in to show their hourly rate and deductions and their hours worked. - 46 answers



85%

The applicant turns in a pay stub dated 93 days prior to the application date. - 52 answers



96%





**QUESTIONS?** 





# Audience Q&A Session

- 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.



- 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 current 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.
  - But remember that you may need an IVA for the period of time prior to when the household member started receiving this income!
  - Also remember that if the paystub is one pay period or more prior to application date, you will need to account for pay received after the paystub.



- In general, the only reason to request a LKE report from DWD is for an applicant claiming unemployment income.
- 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.

For more information about this, review training module 3 on Program Integrity.





### **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!**

