Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
1	Assets	Will WSHFC follow HOTMA change allowing for current balance instead of six month average for checking accounts? And if checking account has to be third party verified, then one bank statement can be used?	Yes, see page 5-20 of Updated Tax Credit Manual.	1/24/2025
2	Assets	At move in we are counting their income from assets even if it is under \$50,000?	Yes, actual income from assets is always counted, regardless of total net family asset amount.	1/24/2025
3		Cost of Living Adjustment (COLA): Per section B.3 of Notice H 2023-10, O/As must apply COLA to any incomplete certifications that are effective January 1 or later of the upcoming year on the day after SSA has announced the COLA. Some agencies have interpreted the guidance to mean that COLA must be applied to all certifications with effective dates after the date the increase was announced (not just certifications effective 1/1 or later). Can you please clarify WSHFC's COLA guidance?	Because the tax credit program does not require or perform interim reviews, an impending COLA would only be applied at a new move in on a pro-rated basis or additionally at an annual recertification at mixed income properties. No adjustments will be made after a move-in, or once a recert has been completed. For example. A household is pre-qualified in October with an anticipated MI date of February. In November, the COLA is announced. This certification would need to be reevaluated and the COLA would need to be applied.  We would not expect management to go back and redo recerts already completed once the COLA is announced.	1/24/2025
4	Income Inclusions and Exclusions	Does WSHFC expect income to be calculated differently under HOTMA? For example, we've seen some agencies modify their guidance to remove references to anticipated income and year-to-date calculations and instead require the TIC calculation to be based on "actual amounts received". Additionally, we've seen many agencies disregard the 12-month lookback that was introduced under HOTMA and instead continue to calculate income based on current circumstances.	Please review Chapter 5 of our revised Manual. If income is the same amount at every payment, then current income is used. If income amounts vary, then historical data will need to be used, particularly for wages, but this could also apply to child support, for example. Self-employment will require use of tax returns. So the type of income and the amount and frequency of receipt will determine what is calculated.	1/24/2025
5	Other WSHFC Changes effective 1/1/2025	Can you please clarify if WSHFC is adopting the streamlined income determination rules outlined in section I.8 of Notice H 2023-10?	Per IRS regulations, we allow 100% affordable tax credit properties to use a Self-Certification form for every recertification, so no recalculation or reverification of income/assets is required. IRS regulations require that mixed income tax credit properties process full third-party recertifications annually, so no streamlined income determination is allowed at mixed income properties.	1/24/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
6	Verification Hierarchy	If The Work Number is used for employment verification, what does WSHFC recommend for calculating income? In the training it was just mentioned not to use data older than 12 months. Can we average two most current pay periods to be in line with HOTMA?	Per Chapter 5, if you are not using up-front verification, then you must use a minimum of the 2 most current, consecutive paystubs. Depending on rate of pay, that could cover a two week period or up to a two month period. As long as you have two most current and consecutive paystubs, that will satisfy the minimum requirement. HOTMA's Level 4 pay stub verification requirement is not a ceiling, it is a minimum requirement. If you are using up front verification and see variable pay, base the calculations on an average from the data you receive, up to 12 months worth. Do not ask for more than 12 months of data from an up-front verification service.	1/24/2025
7	Verification Hierarchy	Are there any changes to how we would calculate farmworker income?	There are 2 aspects to qualifying a farmworker. Nothing has changed regarding how to verify they meet the Farmworker definition and have earned \$3,000 from farm work. To determine if they income qualify for the LIHTC program, follow updated HOTMA guidance. see Verification hierarchy in manual.	1/24/2025
8	Verification Hierarchy	When verifying employment, is BVS the preferred verification? What about anticipating overtime when using BVS? Does BVS take all this into consideration?	Per revised Chapter 5 of Manual and revised FAQs, the Commission does not endorse any particular up-front verification source. That said, BVS is good for non-wage sources of income. Wages may need to be verified with another up-front source or with pay stubs.	1/24/2025
9	Verification Hierarchy	Can you please clarify if WSHFC will accept safe harbor verification from any of the programs outlined in section J.4 of Notice H 2023-10? If yes, which programs, and will WSHFC allow the verification to be used at MI/IC and AR?	We have not decided if we'll accept 50058s in lieu of all verification documentation from public housing authorities. If we decide to implement this we will publish the change. For now we are not implementing this allowance.	1/24/2025
10	Verification Hierarchy	When bank statements are used to verify a checking account, will WSHFC permit the use of only 1 bank statement rather than the previous 6-statement requirement? If so, would WSHFC use the current balance rather than the 6-month average?	Yes, see page 5-20 of Updated Tax Credit Manual	1/24/2025
11	Verification Hierarchy	he November 15th training indicated that WSHFC will accept the \$50,000 Asset Self-Certification. Can this form be used at Move-In if the household certifies net family assets are at or below \$50,000?	Our new applicant questionnaire (replacement for current REA) will have an under \$50K statement on it that household's can attest to. This will be done at new move in if household declares less than \$50K in net family assets.	1/24/2025
12	Income Inclusions and Exclusions	During the November 15th training it was stated that "arrears payments received in previous 12 months" should be counted as long as there are still arrears owed. Could you please confirm this is the case if there is a lump sum in the 12-month period that could potentially result in an applicant being deemed over income?	If it's a lump sum payment and not the regular payment, don't count it since it is not a regular payment and cannot be predicted when the person would receive more arrears in the future.	2/24/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
13	Verification Hierarchy	Are SSA COLA Notices received just before the start of the new benefit year still accepted year-round as verification of fixed income even though not "dated within the appropriate benefit year"?	As long as the letter indicates which year the changes will be made and clearly states the changes, it's fine.	2/27/2025
14	Hierarchy		You cannot use EIV to verify income for a Tax Credit unit. Use up-front verification or tenant-provided documentation from the source to verify income and assets. Please see Chapter 5 of our Tax Credit Manual for more information.	2/27/2025
15	WSHFC Changes	Is the a sample policy and proceed book for an agency who only administers the LIHTC program? I know for Section 8 programs there is the tenant selection plan, but not sure when we don't administer that program.	The Commission only monitors for the Tax Credit and Tax-Exempt Bond programs. Our Manuals are intended to provide compliance guidance only for those programs.	2/27/2025
16			No. Level 5 verification, up-front verification, is the highest level. If you can't use that, then proceed down the verification hierarchy in order of preferred verification. There may be situations where the first verification received raises questions about eligibility. If that is the case, then obtaining additional documentation to clarify and confirm a household's income and assets may be necessary.	2/27/2025
17	WSHFC Changes effective	being considered members of the household but can be counted for determining household size. Can they be counted	Applicants/residents don't have to list Live in Aides or Foster Adults/Children on the HEA, since their income/assets are not counted toward annual gross income and they are not counted for purposes of the AMI income limits. Foster children and adults would be counted towards occupancy only and should be listed on the TIC.	2/27/2025

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18	Assets	IRA's - US Housing Consultants said RMD's, even if taken only once annually, should be included as income because it is determinable (it will happen). What is WSHFC's position? What about IRA's that are part of a larger investment portfolio? Do the same rules apply to that portion of the investment? We have a senior portfolio, and seniors will withdraw sums of money when needed for other expenses that their regular fixed income cannot cover. Currently, if they take money out more than once in a 12month period those withdrawals are considered income. Does this still apply? When assets total less than \$50k, this is self-certified by the applicant/resident, no verification required, for the value or the income actually earned from the asset, correct? This is a little more concerning with seniors who potentially have more assets.	Per HUD's HOTMA Notice, any income that occurs periodically (meaning it happened once and will happen again on a regular basis, even if that basis is only once per year) is counted. Withdrawals are periodic distributions and should be counted towards income. This applies to RMD's taken once a year. Note that retirement accounts are no longer considered assets but any periodic withdrawals are counted as income. The actual or imputed income of the cash value of an asset is only counted if net family assets exceed the HUD asset threshold (currently \$51,400). Net family assets which exceed the HUD asset threshold need to be verified. If net family assets are under the HUD threshold, only actual income generated by an asset is counted toward gross household income, and none of the assets need to be verified.	2/27/2025
19	Income Inclusions and Exclusions	To clarify, if a worker is receiving L & I, those payments are not included? We must verify if there is a return-to-work date? For the VA, disability payments whether periodic or not are not included for service-connected disabilities? What type of verification is needed that it is a service-connected disability?	L & I income, otherwise known as Worker's Compensation benefits, are exempt from annual gross income. If verification clearly shows a back-to-work date, then start counting wages from that date. If no back to work date is shown, then don't pursue. Please see Chapter 5 of our Tax Credit Manual as well as HUD's HOTMA Notice for more information about VA benefits. Documentation from the source of the benefits should be obtained.	2/27/2025
20	Assets	Can we use the current balance for checking accounts instead of a 6 month average balance?	Yes, see page 5-20 of Updated Tax Credit Manual	2/27/2025
21	Other WSHFC Changes effective 1/1/2025	Will there be updated verification forms for the new HOTMA changes?	Per our revised Tax Credit Manual, the highest form of verification is up-front verification, so management companies should be implementing systems to obtain verification via such sources. Therefore, very few of the Commission's previously used third-party verification forms will need to be used. We have a new verification form for student financial assistance, please see our website.	2/27/2025

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22	Other WSHFC Changes effective 1/1/2025	For HOME units that have households assisted through a Federal tenant based rental assistance program (TBRA, i.e., Housing Choice Vouchers through the local housing authority), is the state HOME program going to accept the Housing Authority's rent determination (their 50058), or will you require the management agent to continue doing their own verifications?	The Commission does not administer the HOME program. Please contact your HOME funder directly for more information.	2/27/2025
23	Other WSHFC Changes effective 1/1/2025	If the YTD calculation is no longer required after 1/1/25, what if the pay stub indicates YTD is close or over the Maximum Income? We can't unsee the YTD total and how should that be addressed?	If paystubs or up-front verification clearly indicate YTD income which exceeds the income limit, then management should obtain additional clarification from the employer stating that the person's income will be reduced within the next 12 months. If that cannot be obtained, then the family cannot be qualified.	2/27/2025
24	CHECHIVE	Can you please clarify how income from The Work Number should be calculated? The training stated to not use anything beyond 12 months ago and the updated manual states to "add all wage amounts received together" (not time period referenced). Are we to average all historical pay for the last 12 month period when using TWN? Is there a reason the last two pay stubs would not be averaged to determine income in a manner consistent with pay stubs? Since YTD is no longer considered, it is unclear why extended, historical pay is factored into the calculation.	If you are using up-front verification to verify wages, use data from the same timeframe for all applicants/residents, regardless of what timeframe you choose. That said, obtaining more than the last 120 days of information is not necessary and should only be done if there is difficulty in substantiating someone's income or if the type of income warrants it. For example, for persons who are self-employed, you would obtain the most recent filed tax return to verify their income.	2/27/2025
25	Other WSHFC Changes effective 1/1/2025	Manual updates: I want to confirm that even though the Tax Credit Manual has been updated effective 12/2024 these changes do not go into effect until 01/01/2025.	Correct.	2/27/2025
26	WSHFC Changes effective	If a file was started in 2024, and completed in 2025, do we use the 2024 rules or the new HOTMA rules?  Also, will there be updated forms? Currently there is no form for the increase asset certification.	New forms are now available on our website.	2/27/2025

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27	Accets	When will the form for the assets be updated to reflect \$50,000? Our third party auditor is stating they will not update until the forms are updated?	Our new HEA has an asset section and also asks the family to confirm whether or not their assets exceed the HUD asset threshold.	2/27/2025
28	Other WSHFC Changes effective 1/1/2025	Is this rule to mean the form itself is to be completed for student status or the first page of the REA or the Self-certifications is sufficient? Certification of Student Status is required for every member of every qualified household at every tax credit project every year, regardless of project type or where the project is in its Regulatory Agreement period.	Households completing our HEA do not need to complete a Student Certification form. Households who complete the Self-Certification of Income form and check "Yes" for every household member under "Fulltime Student" must complete the Student Certification.	2/27/2025
29	Student Financial Aid	This link is currently showing the form from 2009. Will this be	This should be fixed now. If it is not, please email us at askusAMC@wshfc.org so we can fix it.	2/27/2025
30	Other WSHFC Changes effective 1/1/2025	1# Is the new HEA page 11 replacing the student status certification? 2# I don't see the under \$5,000 or \$50,000 form is the new HEA question on page #9 replacing the under \$5,000 sworn declaration?	Households completing our HEA do not need to complete a Student Certification form. Households who complete the Self-Certification of Income form and check "Yes" for every household member under "Fulltime Student" must complete the Student Certification. The asset threshold question is at the bottom of page 9 of the new HEA. No additional asset form is required.	2/27/2025
31	1/1/2025	I have questions from the HEA Part 2 question #20 is the list bus pass, gas for your car, food diapers, cable or phone bill all counted as INCOME? what if the family member pays the bill directly? and does this need to be listed on the TIC as income?  Part 4 asset information question # 20 does the tax return refund need to be listed on the TIC? it's usually already in a bank account I wouldn't want to count it twice.	Please see the definition of gift income and in-kind donations in HUD's HOTMA Notice as well as Chapter 5 of our revised Tax Credit Manual. A link to the HUD Notice is available on our website under the link for Chapter 5 on our Tax Credit Manual page. You will not count any amount received by the family as a tax return refund or credit within 12 months of the refund's receipt. Please see HUD's HOTMA Notice for more information.	2/27/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
32	Other WSHFC Changes effective 1/1/2025	On the new TIC I don't see where it calculates the passbook interest rate. Do we need to add the passbook rate to all assets under \$50,000 or only when third party verifying over \$50,000? I heard something about having to verify all assets every three years, is this true and if so, would it also pertain to a full tax credit property?	There is no passbook rate on the TIC because the rate may change every year, per HUD's guidance. Management companies are responsible for confirming the relevant passbook rate on HUD's website each year. Calculating income from an asset using the passbook rate (i.e., imputed income) is only necessary if net family assets exceed the HUD asset threshold and if an asset doesn't generate any actual income. Verifying assets every three years does not apply to the Tax Credit program, please review Chapter 5 of our Tax Credit Manual.	2/27/2025
33	Other WSHFC Changes effective 1/1/2025	Hello, I am checking in to confirm if the HOTMA compliant TIC has been released?	Yes.	2/27/2025
34	Other WSHFC Changes effective 1/1/2025		We expected owner/managers to be applying the HOTMA changes to income and assets as of 1/12025. We expect properties to be using our new forms now. That said, if a management company needs more time for their software providers to implement our forms into their systems, then our old forms can be used.	2/27/2025
35	Other WSHFC Changes effective 1/1/2025	The only forms updated on the WSHFC site where student forms? Can we implement HOTMA now for move ins? Or do we have until July?	We expected owner/managers to be applying the HOTMA changes to income and assets as of 1/12025. We expect properties to be using our new forms now. That said, if a management company needs more time for their software providers to implement our forms into their systems, then our old forms can be used.	2/27/2025
36	Income Inclusions and Exclusions	I noticed that public housing assistance is now on the HEA under income, are we now adding the voucher amount as an income?	No, HAP payments are exempt from income, it is just for information.	2/27/2025
37	Assets	Are you allowing HOME units to use the under 51,600 limitation and if over, can they just verify a current balance on a checking account?	The Commission does not administer the HOME program. Please contact your HOME funder directly for more information.	2/27/2025
38	Assets	What form replaces the old Under \$5,000 Asset Form?	There is no new form. The asset threshold question is on our new Household Eligibility Application.	2/27/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
39	Other WSHFC Changes effective 1/1/2025	Self employed individual. First year of business 2024. No tax return. What form of verification should we use?	You will likely need to go with a self-certification of projected income, if there is nothing else to verify.	2/27/2025
40	•	Question on the HEA Question 12. For Public Housing/Rental Assistance/Section 8 Voucher, it is asking for the Housing Authority providing assistance. What is the amount that you want listed in the \$ field? For a new applicant, they do not yet know what the Tenant Rent or Housing Assistance Payment will be, as it will be calculated once the income has been verified and transmitted to the HA during the application process. What value do you instruct the applicant to put in this field?	The number to put in the gross amount field is the amount of anticipated HAP received for the next 12 months. If tenant doesn't know what the amount is, they can just put "don't know".	2/27/2025
41	nierarchy	When calculation Income using paystubs- Is the 120 day count from the pay period end date or the pay date? Since the instructions say a minimum of two paystubs, can we choose to use a 6 pay stub average when income qualifying move ins? And if the two pay stub average over qualifies a applicant- yet the 6 paystub average qualifies the applicant- will this be a issue for WSHFC? Thank you.	HUD's rule is that all income/asset verification (with a few exceptions) should be dated no earlier than 120 days prior to the certification effective date. Owners/managers are free to be more conservative than what is outlined in the Commission's Tax Credit Manual, but they should make sure they are applying a consistent standard to all applicants and residents when calculating income. Also, be mindful that the goal of HOTMA is to get applicants qualified more easily for housing, so consider that as you determine what timeframe you want verification to cover.	2/27/2025
42	Assets	If assets are less than 50,000 is the full account number required on the HEA or will the last 4 digits work?  Question 20 - we are unsure how this applies to current assets- please advise. Does a Tax Return listed count towards 50K asset total? What information are you wanting to see?	Partial account numbers are fine on the HEA if net family assets are under the HUD asset threshold. The household declares their assets, including the cash value of each asset and expected actual income, on the HEA. If the cash value amounts written on the HEA add up to under the HUD asset threshold, then no third-party verification is necessary.	2/27/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
43	Income Inclusions and Exclusions	We understand that with HOTMA, we are not to consider YTD earnings. However it raises a red flag when YTD earning on a collected pay stub are much higher than the 2 pay stub average and would overqualify a household. How does WSHFC view YTD info? Would a much higher YTD figure flag more of a clarification to be requested/added to the file or is YTD in fact not to be considered?	If verification doesn't indicate otherwise, and it shows income that is at or below the limit, then the household would be qualified and there would not be a need to go further to obtain YTD information as we might have done in the past. We can accept the verification at face value without asking for more information. This is the point of HOTMA.  But that is not what is happening here. The documentation – the minimum verification required, 2 paystubs - clearly indicates that within the last 120 days, the household collected enough wages to put them over the income limit. We can't ignore what the verification is telling us. On the face of that information, management should deny. If the family argues that they are not going to make the same amount of money in the next 12 months, then family should provide a letter from employer that confirms a reduction in pay. If they could provide that, then the family could be qualified.  If the paystubs had not indicated any YTD information at all, then mgmt. could have qualified the household because the verification was not providing any information to suggest that the family didn't qualify. But that is not what happened. Management didn't go above and beyond to "overdo" the verification – they requested the minimum required. And that minimum requirement included information that disqualifies the household. So to qualify the household, mgmt. now needs to get more information to counter what the paystubs have indicated. If the family can't provide that, then cannot qualify the household.	2/27/2025
44	Income Inclusions and Exclusions	If YTD should continue to be considered if it appears on the paystub, as it is a value that cannot be overlooked, this seems to contradict WSHFC's written instructions.	While we no longer require YTD be obtained or annualized in every wage calculation situation, if there is any information on a pay stub that would lead management to believe that the current pay listed on the pay stubs obtained is not indicative of the usual pay, then management should obtain more information. For example if a pay stub shows significant YTD overtime, bonuses, commission, or other pay that was not included in the current pay on the 2 pay stubs averaged.	2/27/2025
45	Income Inclusions and Exclusions	Is a fulltime student household member who also signed the lease still eligible for the \$480 student wage exemption?	24 CFR Part 5.603 indicates that a household member (excluding the head of household or spouse) who is a fulltime student is included in the definition of dependent and therefore qualifies for the \$480 student wage exemption if they also have a job.	2/27/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
46	Other WSHFC Changes effective 1/1/2025	a different date from when the manager signed the TIC?	Applicant/resident and manager signatures dates can be different as long as the form is signed/dated prior to actual lease signing or effective date and the certification process is complete.	2/27/2025
47	Verification Hierarchy	I need to verify student status for a household member. However, the household didn't declare any student financial assistance as part of their income - can I just use the old Student Status Verification form to verify status only?	Yes, the old student verification formcan still be used if the only thing you need to verify is the student's status (i.e. whether fulltime or part-time).	2/27/2025
48	Verification Hierarchy		No. The fact that no income/assets were disclosed on the HEA by the zero income household member is adequate verification of their zero income status.	2/27/2025
49	Income Inclusions and Exclusions	What do we do with any tax credit or refund received by a household (#20 on HEA)?	Exclude any disclosed amount, see HUD's HOTMA Notice for more information.	2/27/2025
50	Income Inclusions and Exclusions	Do we verify? It is listed in income section of HEA but this is	Certain income/asset types are listed on the HEA for informational purposes. If a listed income or asset type is excluded from annual income, then exclude it. For more information, review HUD's HOTMA Notice.	2/27/2025
51	Verification Hierarchy		A written self-certification from the person giving the gift is best but if not possible, the applicant/tenant may supply a self-certification of the gift income they receive.	2/27/2025
52		Statements?	If a bank statement seems to indicate the presence of income that is not declared or is not explained on the HEA, then an explanation and/or verification should be obtained.	2/27/2025
53	Verification Hierarchy	employment has not changed?	The most recent tax return is sufficient verification of income received by a self-employed person. However, if the income on the tax return would disqualify a self-employed person from housing, the owner should provide the self-employed person an opportunity to provide additional verification that indicates their income is going to decrease in the next 12 months. It is not necessary to ask for both a tax return and projected income if the tax return itself is sufficient for qualification.	2/27/2025

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54	Changes effective 1/1/2025	Can the head of household take the HEA home to complete it, or must it be completed in the presence of a staff member? Or would the HOH be expected to compile the information and complete it in management's presence? If they are permitted to take it, do other household members need to have their signature notarized if they are not present to sign? There is no longer a place for a staff member to sign that they witnessed the applicant complete and sign the forms.	Management can decide what application process works best for their teams and their applicants. The HEA is the household's declaration of income and assets to the owner, it doesn't need management signatures. Management and applicants/residents sign the TIC, which is where the applicants/residents have an opportunity to review the numbers management came up with and sign off on those income/asset figures as accurate representations of what they reported on their HEA. Notarization is no longer required on any WSHFC form. The head of household can sign the HEA and take it home for additional signatures or have adult household members come with them to sign the HEA while it's being filled out.	2/27/2025
55	Verification Hierarchy	We have a scenario with an applicant that has children but answered no to receiving child support payments on the HEA. She said she has no separation agreement, no child support award, no custody agreement. Should we follow up and if so, what would be the preferred method of follow up? The child support form is no longer on the WSHFC website so can we assume applicants are no longer expected to complete it?	If an applicant answers no to the Child Support question on the HEA the Commission requires no further backup. This is due to HOTMA stating that only the child support received needs to be counted and removing the requirement that any amount court ordered be counted if no attempts have been made to collect it.	2/27/2025
56	Income Inclusions and Exclusions	At what point when a person stops receiving unemployment payments can we forego projecting that income? Here are a few scenarios: 1) A person has an open unemployment claim for some months but has not claimed a single payment. They are not employed. 2) A person who was receiving unemployment earlier in the year, the claim is past the BYE (benefit year ending) and it has been several months since they have gotten a payment. They are also not currently employed. 3) A person who was receiving unemployment recently on a weekly basis, however a month before applying for housing, their payments stopped (example scan attached). This applicant is otherwise certifying they are zero income. In these 3 examples, must we still annualize unemployment payments, as they may be extended? Or can we argue these unemployment claim payments are no longer "current circumstances" and therefore should not be annualized?	since the person qualifies, even with the income. If an applicant <b>does not</b> declare unemployment on their HEA, then there is no need for an owner to verify it, even as a back-up measure for households that declare they have no income/assets at all.	2/27/2025

Question Number	Question Category	HOTMA Questions	WSHFC Responses	Date Answered
57		Does WSHFC want us to put live in aids and foster	Applicants/residents don't have to list Live in Aides or Foster Adults/Children on the HEA, since their income/assets are not counted toward annual gross income and they are not counted for purposes of the AMI income limits. Foster children and adults would be counted towards occupancy only and should be listed on the TIC.	2/27/2025