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The Guaranteed Income Community of Practice (GICP) is grateful to the members of this GICP Federal Benefits Protection Working Group for their time and insights.

Thank you to the following members, whose guidance and expertise was integral to producing this resource: Halah Ahmad, Sarah Berger Gonzalez, Taikein Cooper, Kim Drew, Emma Gutman-Slater, Mara Heneghan, Jennifer Kellett, Kelvin Lassiter, Mark Lee, Madeleine Levin, Gena Lewis, Katherine Moloney, Madeline Neighly, Stephen Nuñez, Teri Olle, Jim Pugh, Jeremy Rosen, Kelli Smith, Pete Subkoviak, and Hope Wollensack.

This report was authored by Mara Heneghan.
Background

Founded in 2021, the Guaranteed Income Community of Practice (GICP) is co-convened by the Economic Security Project, Springboard To Opportunities, Asset Funders Network, Mayors for a Guaranteed Income, Stanford Basic Income Lab, and the Center for Guaranteed Income Research at the University of Pennsylvania. The GICP is a broad table bringing together practitioners, policymakers, researchers, and advocates from across the country to support guaranteed income policies and programs at the state, local, and national level. While discussing the interactions between guaranteed income and other social safety net programs, the GICP identified a need to explore and recommend strategies to protect guaranteed income recipients’ public benefits. The GICP Federal Benefits Protection Working Group (Working Group) convened to conduct research, propose solutions, and devise a strategy to protect public benefits for guaranteed income recipients.

The GICP Federal Benefits Protection Working Group is composed of members of the larger GICP community who have volunteered to support this work:

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
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<tbody>
<tr>
<td>Halah Ahmad</td>
<td>Jain Family Institute</td>
</tr>
<tr>
<td>Sarah Berger Gonzalez</td>
<td>Stanford Basic Income Lab &amp; NYC Trust Youth Initiative</td>
</tr>
<tr>
<td>Taikein Cooper</td>
<td>Virginia Excls</td>
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<td>Kim Drew</td>
<td>Heartland Alliance</td>
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<td>Emma Guttman-Slater</td>
<td>Yerba Buena Center for the Arts</td>
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<tr>
<td>Mara Heneghan (Working Group Coordinator)</td>
<td>University of Chicago Crown Family School of Social Work, Policy, and Practice</td>
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<tr>
<td>Jennifer Kellett</td>
<td>Humanity Forward Foundation</td>
</tr>
<tr>
<td>Kelvin Lassiter</td>
<td>National Coalition for the Homeless</td>
</tr>
<tr>
<td>Mark Lee</td>
<td>Old 4th Ward Economic Security Taskforce</td>
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<tr>
<td>Madeleine Levin</td>
<td>Social Policy Research Associates</td>
</tr>
<tr>
<td>Gena Lewis</td>
<td>Ikaso Consulting</td>
</tr>
<tr>
<td>Katherine Moloney</td>
<td>Humanity First Movement</td>
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<tr>
<td>Madeline Neighly (ESP Lead)</td>
<td>Economic Security Project</td>
</tr>
<tr>
<td>Stephen Nuñez</td>
<td>Jain Family Institute</td>
</tr>
<tr>
<td>Teri Olle</td>
<td>Economic Security Project Action</td>
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Project Plan and Development

During the GICP Federal Benefits Protection Working Group’s first meeting in May 2021, the group began to develop a shared research agenda (see additional information in Appendix A: Meeting Materials). Based on this discussion, the group developed an initial project plan that anticipated a multi-step process resulting in proposed federal legislation to protect public benefits for guaranteed income program recipients. This process included three phases: Conduct Research; Align on Solutions; and Create Advocacy and Implementation Strategies.

During the Conduct Research phase, the Working Group sought to clearly outline which benefits fell under the scope of the project and whether federal legislation was the appropriate approach to protecting each benefit. The Working Group included the following benefits in its initial research scope:

### Chart 2: Public Benefits within GICP Federal Benefits Protection Working Group’s Initial Research Scope

<table>
<thead>
<tr>
<th>Classification</th>
<th>Benefits</th>
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</table>
| Federally Determined Income & Asset Limits | • Child Tax Credit (CTC)  
• Earned Income Tax Credit (EITC)  
• Federal Pell Grants  
• Low Income Home Energy Assistance Program (LIHEAP)  
• Medicaid  
• Medicare  
• Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)  
• Supplemental Security Insurance (SSI)  
• Supplemental Nutrition Assistance Program (SNAP) |
| State Authorized to Determine Income & Asset Limits | • Child support benefits  
• Children’s Health Insurance Program (CHIP)  
• Temporary Assistance for Needy Families (TANF) |
| Local Authority Authorized to Determine Income & Asset Limits | • Housing Choice Vouchers (Section 8)  
• Public housing benefits |
| Other | • Creditor garnishment  
• Debt deductions (no garnishments)  
• IRS back tax protections  
• Means-tested Native American/Tribal programs (FASS)  
• Means-tested Veteran programs (FASS) |
The group reconvened in July 2021 to review initial research on these benefits and assign next steps. The group discussed the following framing questions for each benefit:

1. Does the type of funding (private philanthropic funding / public funding) impact potential protection for this benefit? If so, how?
2. Does the method and frequency of payment distribution impact potential protection for this benefit (ex: distributing as a monthly tax credit)? If so, how?
3. Do various household arrangements impact the potential protection for this benefit (ex: marriage status or dependent status)? If so, how?
4. Would federal legislation be helpful in protecting this benefit? If so, what are the specifics needed for this legislation?
5. Is pursuing non-legislative federal action possible for this benefit? If so, is that where we want to dedicate energy and resources?

Initial research on the Working Group’s findings around these questions is included in the Initial Conclusions section of this document and in the Compiled Research: Public Benefits and Guaranteed Income deliverable. Areas where continued research is needed are outlined in the Options for Moving Forward section of this document.

This research made it clear that while federal legislation would provide the most stable and far-reaching protection, it would not be practical to move legislation forward at the pace needed for existing programs and programs currently under development. Thus, the Working Group aligned on the following approach:

<table>
<thead>
<tr>
<th>Federal Legislation</th>
<th>Non-Legislative Federal Action</th>
<th>Guidance for states and local governments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wherever possible, over the long-term our goal is to protect public benefits through federal legislation.</td>
<td>We will also pursue non-legislative federal action where it can provide protection more quickly than federal legislation.</td>
<td>Where a federal fix will not be effective or adequate, we will develop resources and informational materials for states or other implementers to prioritize providing support in the immediate term.</td>
</tr>
</tbody>
</table>

The GICP Federal Benefits Protection Working Group formed subgroups to focus on specific benefits where members had expertise: Child Tax Credit (CTC) & Earned Income Tax Credit (EITC); Supplemental Nutrition Assistance Program (SNAP) & Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); and Medicare, Medicaid, and Children’s Health Insurance Program (CHIP). The subgroups’ initial findings are included in the Initial Conclusions section, and areas that require continued research are outlined in the Options for Moving Forward section.

The Working Group provided an update at the GICP’s November 2021 meeting. Based on broad interest from GICP members, the Working Group hosted a deep dive discussion in January 2022 to provide additional resources, information, and support.
## Deliverables

The GICP Federal Benefits Protection Working Group has compiled or assisted in compiling the following deliverables to document its work and serve as a resource to guaranteed income program designers and implementers.

<table>
<thead>
<tr>
<th>Deliverable</th>
<th>Audience</th>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Federal Benefits Protection Fact Sheet</strong></td>
<td>Guaranteed income program implementers and advocates</td>
<td>Document to lay out considerations for program designers in the short-term</td>
<td>Completed June 2021</td>
</tr>
<tr>
<td><strong>Compiled Research: Public Benefits and Guaranteed Income</strong></td>
<td>Policymakers and implementers working on protecting public benefit</td>
<td>Slide deck outlining initial research on each benefit identified in the “Conduct Research” phase of the Project Plan</td>
<td>Completed December 2021</td>
</tr>
<tr>
<td><strong>States Lead the Way: Reimagining the social safety net through implementation of a guaranteed income from The Shriver Center on Poverty Law and Economic Security Project</strong></td>
<td>Public sector guaranteed income program implementers and supporters at the state level</td>
<td>Document to guide states through options for protecting benefits</td>
<td>In Progress - expected March 2022</td>
</tr>
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</table>
Initial Conclusions

Findings

Eligibility for public benefits is generally determined based on an income and asset limit set by either a federal, state, or local government agency. Depending on how the applicable agency calculates income for a given benefit, receiving payments through a guaranteed income program could impact a recipients’ eligibility to continue receiving that benefit.

Whether the guaranteed income program is privately or publicly funded has important implications in determining how receiving payments through the program will impact a recipient’s public benefits eligibility. To date, the majority of guaranteed income programs have been philanthropically funded, with funders and program and agency administrators determining that these payments qualify as gifts under Internal Revenue Service law and guidance (26 U.S.C. 6409. FAQ), thus protecting the guaranteed income from consideration as earned income for some public benefit programs.¹

Many agencies exempt gifts from income calculations when determining benefits eligibility, meaning payments received through a guaranteed income program structured as a gift do not impact a recipient’s eligibility for these benefits.

Based on the success of these initial guaranteed income programs and strong advocacy, many states and municipalities have announced publicly-funded guaranteed income programs. These publicly-funded programs will need to be intentional about how they structure payments to provide the strongest benefit and protection to recipients. The Shriver Center on Poverty Law’s and Economic Security Project’s forthcoming States Lead the Way: Reimagining the social safety net through implementation of a guaranteed income is a helpful resource for publicly-funded guaranteed income programs.

Child Tax Credit & Earned Income Tax Credit

Federal tax credits, including the Child Tax Credit (CTC) and Earned Income Tax Credit (EITC), distributed periodically are explicitly exempt from being counted as income by statute by Internal Revenue Code 26 USC § 6409. However, this statute is silent on the treatment of state and local tax credits. Structuring payments at regular, recurring intervals versus as lump-sum payments may have implications for the “gift” consideration. Jain Family Institute noted this has come up in Michigan, with

¹Importantly, the IRS has not provided specific guidance on whether philanthropically-funded guaranteed income demonstration payments are “gifts.” In addition, federal, state, county, and local interpretation of what counts as “income” and its impact on receipt of public benefits may vary between agencies.
implementers worried that regular payments are not gifts, specifically for Medicaid income levels. In Georgia, officials have decided to lean into the temporary aspect of the payments, even if they are recurring. However, this depends on the specific state regulations.

Extending the exemption for federal tax credits to recurring state and local tax credits, would permit state and local guaranteed income programs to be structured as tax credits without fear of disrupting other social safety net benefits. As more programs use public funds, and as we build from short-term program to long-term policy, this change is worth aligning behind.

**Medicare, Medicaid, Affordable Care Act Subsidies, and Children’s Health Insurance Program**

Medicare has no income limit so guaranteed income payments do not impact eligibility. Guaranteed income payments will be treated as a gift for income-eligible (MAGI) Medicaid, Children’s Health Insurance Program (CHIP), and Affordable Care Act (ACA) subsidy recipients, but will be treated as income for categorically eligible individuals (non-MAGI).

Humanity Forward Foundation and the City of Philadelphia are jointly pursuing a State Plan Amendment with Pennsylvania Centers for Medicare and Medicaid Services (CMS) to waive guaranteed income for categorically eligible (non-MAGI) groups. In this case, participating in research cannot be mandatory because the payment needs to be a gift for MAGI recipients. Implementers have found that it is important to have separate organizations conduct research and distribute payments so that research is not conditional for the gift.

**Social Security Disability Insurance and Supplemental Security Income**

The Working Group did not extensively investigate Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) given existing knowledge in the field that protecting these benefits would be extraordinarily difficult given their expansive criteria when determining eligibility. The Working Group supports continued work on this topic to ensure people with disabilities and older adults are not excluded from participating in guaranteed income programs. Especially as programs work to generate evidence about the impact of guaranteed income, effectively excluding these populations from participation will hinder future efforts to advance equitable policies.

**Special Supplemental Nutrition Program for Women, Infants, and Children**

Based on policy developments in California, advocacy for protecting the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) needs to happen at the federal level. California WIC was going to handle each income supplement program on a case-by-case basis but decided to play it safe until they receive different guidance from USDA. This means all California guaranteed income programs have to start taking the payments received from a guaranteed income program into account for WIC eligibility.
Every five years, the Child Nutrition Reauthorization (CNR) provides Congress with an opportunity to improve and strengthen the child nutrition and school meal programs. The current law expired on September 30, 2015, but the programs continue to operate with extensions. Some policymakers are exploring potential ways to affirmatively exempt guaranteed income payments from determining WIC eligibility through the CNR, ideally in spring 2022.

**Supplemental Nutrition Assistance Program**

As a needs-based program, the Supplemental Nutrition Assistance Program (SNAP) examines an individual household’s budget and assumes the household has 30 percent of their net income for food. SNAP is an individual determination program with a very detailed look at household expenses, which is why Temporary Assistance for Needy Families (TANF) and the Earned Income Tax Credit (EITC) count as income. Changing this underlying ethos would require Congress to have a new understanding of what people need.

In the short-term, the easiest way to protect SNAP is through TANF. A state may use its option to extend the same income exclusions used to determine TANF eligibility or benefits to also determine eligibility and benefits for SNAP. A state agency that chooses to exclude income in this manner, referred to as categorical eligibility, must specify in its SNAP state plan that it has selected this option and describe the resources that are being excluded, subject to restrictions stipulated in 7 CFR § 273.9(c)(19). There are some restrictions to categorical eligibility through TANF, and it only applies if the funding comes from a private, non-governmental source. Additionally, this relies on state cooperation since TANF laws vary across states. For example, to use categorical eligibility New York’s TANF legislation requires that the dollars are not used to meet basic needs and California requires Institutional Review Board (IRB) approval. There is precedent for pursuing categorical eligibility for SNAP through TANF in Illinois, New York, and California.

In the medium-term, the GICP could approach the U.S. Department of Agriculture Food and Nutrition Service (FNS) about an option or mandate to exclude money received from a guaranteed income demonstration. The California Department of Social Services is currently pursuing this approach. In the long-term, the GICP could pursue regulatory change to the Code of Federal Regulations (CFR) or pursue a statutory change through the Farm Bill or a budget bill. Pursuing either of these strategies needs to be determined based on legality and political viability.

**U.S. Dept. of Housing and Urban Development Section 8: Public Housing and Housing Choice Vouchers**

A coalition of guaranteed income programs and supporters, including some members of the GICP Federal Benefits Protection Working Group, have approached the U.S. Department of Housing and Urban Development (HUD) about excluding income from “temporary direct cash pilots” when calculating recipients’ eligibility for Section 8 housing programs and rent. The coalition held an initial meeting with HUD in November 2021 and sent background information, a request for action, and proposed mechanisms for implementation to HUD in December 2021. A follow up meeting was scheduled in January 2022 to further discuss key personnel who should be involved in reviewing and implementing the request. In particular, the coalition is requesting that HUD add clarifying language to their regulations to ensure that money received as part of a guaranteed income demonstration is excluded from determining benefits. Key sections of the proposal sent to HUD are available in Appendix C: Materials for HUD.
Recommendations

- **Implementers of guaranteed income demonstrations must design programs to be transparent, provide recipients with sufficient information about which benefits may be impacted, and be intentional about supporting recipients as they navigate this aspect of program participation:** Program implementers should incorporate benefits counseling into their enrollment process to ensure recipients have full knowledge of how participating may impact their benefits. Program implementers should also create Hold Harmless funds to support recipients if they do lose access to benefits as a result of participating in the program. Program implementers should incorporate re-enrollment counseling into programs to engage participants at a set time before the end of the program to support re-enrolling in benefits if the participant is interested.

  **GICP next step:** Compile examples and materials to support best practices on benefits counseling, Hold Harmless funds, and re-enrollment strategies.

- **States should act now to protect benefits:** Guaranteed income demonstrations are launching at a fast and quickening pace across the country, partially due to support from state and local governments through their American Rescue Plan Act allocations. As more pilots emerge, states should pursue legislative and administrative action to protect these benefits. California (CA AB-1338), Illinois (IL Public Act 101-0415), and New York (NY Senate Bill S5759A) provide various models for how state legislatures can protect benefits for guaranteed income recipients.

  **GICP next step:** Publicize States Lead the Way: Reimagining the social safety net through implementation of a guaranteed income when available

- **Federal agencies with authority over specific benefits should issue affirmative guidance exempting guaranteed income from applicable income and asset levels:** Federal agencies have broad discretion over the income and asset limits associated with many public benefits. Issuing affirmative guidance that exempts or allows authorized entities to exempt money received through a guaranteed income demonstration from income and asset limits will provide clarity for implementers and states and promote equal benefits protection across jurisdictions. The absence of federal guidance creates inequity between people living in different states and between people who currently depend on existing public benefits and those who do not.

  **GICP next step:** As opportunities arise, provide support and materials for efforts to elevate this cause within federal agencies.

- **Federal legislation will provide the broadest and most stable protection, but requires strategic pushes to be successful:** While federal legislation will protect benefits for the largest number of people, it is not currently a high legislative priority. The GICP and other supporters should continue exploring avenues for elevating the need and potential for this change. Any pursuit of federal legislation must be thoughtfully coordinated to avoid disrupting existing waivers obtained in some states.

  **GICP next step:** To be determined - see Options for Moving Forward section
Options for Moving Forward

Based on its research and discussions, the Working Group has identified the following options for moving forward:

- To protect Supplemental Nutrition Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), determine the political and legal viability of:
  - approaching the U.S. Department of Agriculture Food and Nutrition Service about either a mandate or an option to exclude guaranteed income benefits from SNAP and WIC income levels;
  - changing SNAP and WIC income levels through the Farm Bill or a budget bill to exclude guaranteed income benefits from SNAP and WIC income levels; or
  - changing the Code of Federal Regulations (CFR) to exclude guaranteed income benefits from SNAP and WIC income levels.

- Determine the political and legal viability of excluding periodically distributed state and local tax credits from income and asset level thresholds.

- Investigate asset limits, and the potential for creating a protected escrow account through legislation to use for programs that run up against these limits.

- Explore advocating for Executive Action from the Biden administration to protect guaranteed income recipients.
Appendix

Appendix A: Meeting Materials

For more detailed information on the Working Group’s and sub-groups’ discussions, please see the below materials saved in the GICP Benefits Protection Working Group Google Drive folder.

Appendix B: Example Bills and Resources

The Working Group has compiled related or example bills and other resources throughout the course of their work that can support various work under the options for moving forward.

- **General resources**
  - IRS FAQs on Gift Taxes
  - The Benefits Cliff and Guaranteed Income (Guaranteed Income Community of Practice)
  - Protecting Benefits in Guaranteed Income Pilots: Lessons Learned from the Abundant Birth Project (San Francisco Office of Financial Empowerment, Bay Area Regional Health Inequities Initiative, Expecting Justice)
  - Mitigating loss of health insurance and means tested benefits in an unconditional cash transfer experiment: Implementation lessons from Stockton’s guaranteed income pilot (Amy Castro, Stacia Martin, Sukhi Samra and Meagan Cusack)
  - Building Back Better with Direct Cash Assistance: Federal Opportunity to Support Evidence-Based Policy (The City of Philadelphia)

- **Tools**
  - Guaranteed Income Dashboard (Federal Reserve Bank of Atlanta)
  - Benefit Cliffs Calculator (National Center for Children in Poverty)

- **Federal bills**
  - The Worker Relief and Credit Reform Act (the WRCR Act) - [description](#) and [language](#)

- **State bills**
  - CA AB-1338
  - IL Public Act 101-0415
  - NY Senate Bill S5759A
Appendix C: Materials for HUD

A coalition of guaranteed income programs and supporters, including some members of the GICP Federal Benefits Protection Working Group, have approached the U.S. Department of Housing and Urban Development (HUD) about excluding income from “temporary direct cash pilots” when calculating recipients’ eligibility for Section 8 housing programs and rent. The coalition held an initial meeting with HUD in November 2021 and sent background information, a request for action, and proposed mechanisms for implementation to HUD in December 2021. In particular, the coalition is requesting that HUD add clarifying language to their regulations to ensure that money received as part of a guaranteed income demonstration is excluded from determining benefits. Key sections of the proposal are included below:

**Requested Action:** Our coalition is concerned that if HUD does not take action to protect housing benefits for participants in temporary direct cash pilots, economically vulnerable individuals will be forced to opt out of these potentially life changing, anti-poverty initiatives due to concerns about housing stability and rent increases, placing these individuals at a further disadvantage.

We believe that action at the federal level is important to:

1. ensure the equal application of benefit protections for participants within and across temporary direct cash pilots;
2. clarify conflicting messaging about how payments from temporary direct cash pilots should be considered with regards to HUD housing benefits for PHAs and the pilot community;
3. maximize the impact of investment by pilots and support continued investment in this innovative anti-poverty initiative.

**Potential benefits to HUD:** The research outlined above demonstrates the powerful impacts that direct cash can have on alleviating poverty, increasing financial and housing stability, and asset building. Furthermore, these initiatives have shown to have the most positive impact on marginalized communities, particularly communities of color.

HUD beneficiaries participating in temporary direct cash pilots will have access to more flexible dollars to meet their immediate needs; this provides opportunities to 1) build assets 2) focus on activities that increase housing and financial stability in the long-term (employment, job training, etc.)

Research and evaluation performed by the temporary direct cash pilot community has the potential to provide HUD with valuable feedback about its policies and programs; facilitating the participation of HUD recipients in these pilots will promote the accuracy and relevancy of the results to HUD.

This requested action is not anticipated to require any cost expenditure from HUD.

**Possible Mechanisms for Implementation:** Based on our review of the regulations, we have identified two possible mechanisms for implementing a waiver of income received through temporary direct cash pilots:

1. Primary Recommendation: Modify or add clarifying language to the Temporary Income Exclusion 24 CFR § 5.609(c)(9) to extend this exclusion to temporary direct cash pilots.
   - 24 CFR § 5.609(c)(9) Annual income does not include the following: “Temporary, nonrecurring, or sporadic income (including gifts).” For example, amounts earned by temporary census employees whose terms of
employment do not exceed 180 days (Notice PIH 2000-1). A common factor in determining if income is truly sporadic or temporary is whether the family expects to receive income from this source again in the coming year. If the family does NOT expect to receive income from the source in the coming year, it may be considered temporary or sporadic and may be excluded from income. If the family expects to receive additional income from the source in the coming year, even if payments are made on an irregular basis, the anticipated income should be estimated and counted as income.”

- The above guidance outlining how to determine whether income is temporary limits the application of this exclusion to many temporary direct cash pilots. As the start of temporary direct cash pilot payments may not coincide with the start of a recipient’s housing benefit year, recipients may receive payments in more than one of their housing years, even though 1) the payments are time limited and 2) the time frame of receipt is established from the outset.

- Source: Income Determination see section 3.2, page 12.

- We believe this recommendation is the most simple, equitable, and efficient way to move forward. It ensures an equal application of the income exclusion within and across temporary direct cash pilots, provides clear guidance to local PHAs, and has minimal barriers to implementation on the local level. We believe the burden for local PHAs to implement this approach would be minimal.

2. Secondary Recommendation: Require or Allow PHAs to adopt Permissive Deductions 24 CFR § 5.611(b) to exclude income from temporary direct cash pilots.

- Permissive Deductions For the Public Housing Program: PHAs may adopt additional, or “permissive,” deductions from annual income only if the PHA establishes a written policy for such deductions. Permissive deductions may be used to incentivize or encourage self-sufficiency and economic mobility. A permissive deduction might include, for example, an amount of any family earned income, established at the discretion of the PHA, which may be based on— the amount earned by particular members of the family; the amount earned by families having certain characteristics; or the amount earned by families or members during certain periods or from certain sources.

- Source: Income Determination see section 6.6, page 33.

- Limitations of this approach:

  - Permissive Deductions only apply to the Public Housing Program. Temporary direct cash pilots serve individuals in Public Housing, the Housing Choice Voucher program, and Multifamily housing.

  - Many PHAs have opted not to use permissive deductions; additionally it is unclear to us whether HUD could require a PHA to adopt a permissive deduction for temporary direct cash pilots. If HUD cannot require this, then only PHAs interested in pursuing this action would likely move forward. We anticipate that this would result in an unequal application of this income exclusion within and across temporary direct cash pilots.

  - Requires the PHA to establish a written policy for such deductions, which adds burden and barriers to implementation at the local level. Furthermore, PHAs who are not interested in implementing this exclusion could delay this action by failing to establish a policy.