

Topic 6  
Seasonal Workers/Temp Agency

Roles: Tenant - Saleemah  
Manager - Wendy

Issue: A tenant comes in to the office to report they have a change in their income. Based on the documentation received and the employment verification you realize their job is through a temp agency.

Tenant: Hi Wendy I called the office last week to report a change in my income.

Manager: Thanks for stopping by Mrs. Williams. Did you bring your pay stubs down with you?

Tenant: Yes.

Manager: I'll make copies for your tenant file. I also asked your employer to complete an employment verification, which he did.

Tenant: That's fine.

Manager: According to the verification, I see you are working through a temp agency.

Tenant: That's correct.

Manager: How often does your job change?

Tenant: It depends on the length of an assignment and if there's another job at the time one assignment ends and the next one would begin.

Mattie

The Big Question: Several questions come up since this tenant is regularly going to see a difference in their income.

1. At what point is the manager required to file a recert?  
Every Month? Yes/No  
Quarterly? Yes/No  
Semi-Annually? Yes/No  
At annual recert time? Yes/No
2. Does the change in income need to be for a certain length of time before the manager is required to file a recert? Yes/No
3. Does the income need to change by a certain dollar amount before the manager is required to file a recert? Yes/No
4. If the tenant has a history of their income changing and that can be demonstrated, can it be averaged on their annual recert to avoid repeatedly processing the interims? Yes/No

Solution: If a tenant's income changes frequently, their obligation is to report for an interim if their income increases by \$200 or more dollars a month for the household. As a manager, you can refuse to do an interim for a change that lasts less than a month. If a pattern of income fluctuation is a common occurrence and can be documented in the tenant's history, HUD gives you the option of using an average calculation of their yearly income, which would eliminate the constant interim recertifications, as long as the tenant does not dispute the

calculation and current tenant provided documents or third-party verifications do not suggest a higher income level in the next twelve months.

#### HUD Handbook Reference

Chapter 7	Paragraph 7-10, A,4 & 7-11, D,2	Pages 7-22 & 7-24
Chapter 5	Paragraph 5-5A, C	Pages 5-3 to 5-6

24 CFR Part 5 – “Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs (eff. 9/30/09)