List of Policies to Implement HOTMA Final Rule

Programs Affected by the Final Rule: Public Housing (PH), Housing Choice Voucher (HCV/Section 8), and Multifamily Housing (MFH)

This chart is intended to outline the policies the Pinellas County Housing Authority (PCHA) will adopt in the PH Admissions and Continued Occupancy Policy (ACOP), MFH Tenant Selection Plan (TSP), and HCV Administration Plan (Admin Plan) effective with HUD's mandatory compliance date of **January 1, 2025** (or any later compliance date issued by HUD).

Note: The PCHA must continue to follow its existing ACOP, TSP, and Admin Plan until the PCHA's software is compliant with HUD's new Housing Information Portal (HIP) and Tenant Rental Assistance Certification System (TRACS)203A.

Disclaimer: The information contained in this document is sourced from HUD Notice H 2023-10/Notice PIH 2023-27. While every effort has been made to ensure accuracy, this document is not an official publication of HUD (U.S. Department of Housing and Urban Development). Readers are advised to refer to the original notice or consult with HUD directly for authoritative guidance.

HOTMA PROVISION / REGULATION / NOTICE H 2023-10 REFERENCE	PCHA POLICY
<u>De Minimis Errors in Income Determinations</u> (24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); 882.808(i)(5)) Reference: Notice PIH 2023-27/ Attachment B **De minimis errors occur when a PHAs determination of a family's income deviates from the correct income determination by no more than $30 per month in monthly adjusted income (or $360 in annual adjusted income).**	The PCHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.

<u>Asset Limitation for New Admissions </u>**(24 CFR § 5.618)** Reference: Notice PIH 2023-27/ Attachment A **Asset limitations restricts families from receiving housing benefits if their net family assets exceed $100,000 or if the family owns real property deemed suitable for the family to live in.**	There are two circumstances under which a family is ineligible for the program based on asset ownership. First, assistance may not be provided to any family if the family's net assets exceed $100,000 (adjusted annually by HUD). Second, the family has real property that is suitable for occupancy by the family as a residence and the family has: • A present ownership interest in the real property; • A legal right to reside in the real property; and • The effective legal authority to sell (based on state or local laws of the jurisdiction where the property is located) the real property. The PHA does not have the discretion not to enforce or provide limited enforcement of the asset restriction at admission. However, the real property restriction does not apply in the following circumstances: • Any property for which the family is receiving assistance for a manufactured home under 24 CFR 982.620 or under the HCV Homeownership program; • Any property that is jointly owned by a member of the family and at least one non-household member who does not live with the family, if the non-household member resides at the jointly owned property; • Any family that is offering the property for sale; or • Any person who is a victim of domestic violence, dating violence, sexual assault, or stalking. - When a family asks for an exception because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA must comply with all the confidentiality requirements under VAWA. The PHA must accept a self-certification from the family member, and the restrictions on requesting documentation under VAWA apply. A property is considered *suitable for occupancy* unless the family demonstrates that it: • Does not meet the disability-related needs for all members of the family (e.g., physical accessibility requirements, disability-related need for additional bedrooms, proximity to accessible transportation, etc.); • Is not sufficient for the size of the family; • Is geographically located so as to be a hardship for the family (e.g., the distance or commuting time between the property and the family's place of work or school would be a hardship to the family, as determined by the PHA or owner); • Is not safe to reside in because of the physical condition of the property (e.g., property's physical condition poses a risk to the family's health and safety and the condition of the property cannot be easily remedied); or • Is not a property that a family may reside in under the State or local laws of the jurisdiction where the property is located. If a family meets one of the above exceptions, the real property is not automatically excluded from the calculation of net family assets. Unless the real property is specifically excluded from net family assets as described in 24 CFR 5.603, it will be included in net family assets. If the value of that real property brings the net family assets above $100,000 (as adjusted for inflation), the family is out of compliance with the asset limitation.

<u>Asset Limitation at Annual and Interim Reexaminations</u> (24 CFR § 5.618) Reference: Notice PIH 2023-27/ Attachment A **Asset limitations restricts families from receiving housing benefits if their net family assets exceed $100,000 or if the family owns real property deemed suitable for the family to live in.**	The PCHA has adopted a policy of **total enforcement** of the asset limitation for all residents. Families who are found to be out of compliance with the asset limitation at reexamination (annual or interim), the PCHA must initiate termination or eviction proceedings within six months of the income examination that determined the family was out of compliance. PCHA may delay the initiation of termination or eviction proceedings for noncompliant families for up to but no longer than six months. No family will be given an opportunity to cure noncompliance. Within 10 days of completing the family's recertification in which the family becomes noncompliant with the asset limitation, the PCHA will provide the family with written notice stating the family is out of compliance with the asset limitation, and PCHA policy calls for termination of assistance within six months. The notice will include the date the family's assistance will be terminated and/or eviction proceedings will begin.
<u>Self-Certification of Net Family Assets Equal to or Less Than $50,000 (adjusted annually for inflation) (</u>24 CFR §§ 5.603; 5.609; 5.618; 882.515(a); 882.808(i)(1); 960.259(c)(2); 982.516(a)(3)) Reference: Notice PIH 2023-27/ Attachment F/ Appendix **Net family assets threshold changed from $5,000 to $50,000.**	For families with net assets totaling $50,000 or less, the PCHA will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PCHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years. When verification is required, in determining the value of checking or savings accounts, the PCHA will use the current balance. In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the PCHA will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

<u>Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – General Relief</u> (24 CFR § 5.611(c)(2)) Reference: Notice PIH 2023-27/ Attachment C **The sum of unreimbursed health and medical care and reasonable attendant care and auxiliary expenses that exceed 10 percent of the family's annual income can be deducted from annual income. Prior to January 1, 2024, the threshold was 3 percent of the family's annual income.**	To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) or that the family's financial hardship is a result of a change in circumstances. The PCHA defines *a change in circumstances* as a decrease in income or increase in other expenses that has resulted in the family's financial hardship but does not, on its own, trigger an interim reexam in accordance with PCHA policies. Examples of circumstances constituting a financial hardship may include the following situations: • The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits; • The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster; or • Other circumstances as determined by the PCHA. The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PCHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period. The PCHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination. • If the PCHA denies the hardship exemption request, the PCHA notice will also state that if the family does not agree with the PCHA determination, the family may request a hearing. • If the family qualifies for an exemption, the PCHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances. The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PCHA will extend relief for an additional 90-days if the family demonstrates to the PCHA's satisfaction that the family continues to qualify for the hardship exemption based on circumstances described above. The PCHA will require updated verification based on the family's current circumstances. Additional extension(s) may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PCHA may terminate the hardship exemption if the PCHA determines that the family no longer qualifies for the exemption.

<u>Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – Phased- In Relief</u> (24 CFR § 5.611(c)(1)) Reference: Notice PIH 2023-27/ Attachment C **The sum of unreimbursed health and medical care and reasonable attendant care and auxiliary expenses that exceed 10 percent of the family's annual income can be deducted from annual income. Prior to January 1, 2024, the threshold was 3 percent of the family's annual income.**	This hardship exemption is applicable to all families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review. The family must receive phased-in relief if they are determined to be eligible. These families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first. For these families, the threshold amount is phased-in as follows: • The family is eligible for a deduction totaling the sum of expenses that exceeds 5 percent of annual income for the first 12 months. • At the conclusion of 12 months, the family is eligible for a deduction totaling the sum of their expenses that exceed 7.5 percent of annual income for another 12 months. • At the conclusion of 24 months, the standard threshold amount of 10 percent would be used, unless the family qualifies for relief under the general hardship relief category. o When an eligible family's phased-in relief begins at an interim reexamination, the PCHA will process another transaction one year later to move the family along to the next phase. The transaction can be either an interim reexamination if triggered, or a non-interim reexamination transaction. Prior to the end of the 24-month period, the family may request a general hardship exemption as described above. If the family is found eligible under the general relief category, the hardship exemption under the phased-in category ends, and the family's hardship is administered in accordance with the requirements listed above. Once a family requests general relief, the family may no longer receive phased-in relief. The PCHA will not continue the phased-in relief for families who move from a different program (e.g., the family moves from the HCV program to public housing). These families will be treated as new admissions and the sum of expenses that exceeds 10 percent of annual income will be used to calculate their adjusted income.

<u>Hardship Exemption to Continue Child Care Expense Hardship</u> (24 CFR § 5.611(d)) Reference: Notice PIH 2023-27/ Attachment C **A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue the deduction.**	For a family to qualify, they must demonstrate that their inability to pay rent would be as a result of the loss of this deduction. The PCHA defines this hardship as a potential decrease in income or increase in other expenses that would result from the loss of the child care expense and such loss would impact the family's ability to pay their rent. Some factors to consider when determining if the family is unable to pay rent may include determining that the rent, utility payment, and applicable expenses (child care expenses or health and medical expenses) are more than 40 percent of the family's adjusted income, or verifying whether the family has experienced unanticipated expenses, such as large medical bills, that have affected their ability to pay their rent. The family must also demonstrate that the child care expense is still necessary even though the family member is no longer employed or furthering their education. The PCHA will consider qualification under this criterion on a case-by case basis (for example, if the family member who was employed has left their job in order to provide uncompensated care to an elderly friend or family member who is severely ill and lives across town). The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PCHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period. The PCHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination. If the PCHA denies the hardship exemption request, the PCHA notice will also state that if the family does not agree with the PCHA determination, the family may request a grievance hearing. If the family qualifies for an exemption, the PCHA will all required information listed above as well as information on how to request a 90-day extension based on family circumstances. The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PCHA will extend relief for an additional 90-days if the family demonstrates to the PCHA's satisfaction that the family continues to qualify for the hardship exemption. The PCHA will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PCHA may terminate the hardship exemption if the PCHA determines that the family no longer qualifies for the exemption.

<u>**Interim Reexaminations - Decreases in Adjusted Income (24 CFR §§ 960.257(b)(2); 982.516(c)(2); 882.515(b)(2); 891.410)**</u> <u>Reference: Notice PIH 2023-27/ Attachment I</u> **An interim reexamination must be conducted when a family's adjusted income decreases by 10% or more or if a family member permanently moves out of the unit.**	The PCHA will only conduct an interim when the family's adjusted income has decreased by an amount that is 10 percent or more of the family's adjusted income. When determining the 10 percent threshold, the PCHA will round calculated percentages up or down to the next nearest unit as applicable (e.g., a calculated decrease of 9.5 percent will be rounded to 10 percent). However, the PCHA will perform an interim reexamination for a decrease in adjusted income of any amount in two circumstances: • When there is a decrease in family size attributed to the death of a family member; or • When a family member permanently moves out of the assisted unit during the period since the family's last reexamination.
<u>**Interim Reexaminations - Increases in Adjusted Income**</u> **(24 CFR §§ 960.257(b)(3); 982.516(c)(3); 882.515(b)(3))** Reference: Notice PIH 2023-27/ Attachment I **An interim reexamination must be conducted when a family's adjusted income increases by 10% or more.**	Provided a family's increase meets the 10 percent threshold, the PCHA will conduct an interim recertification when the family experiences an increase in <u>**earned**</u> income <u>**and**</u> the family previously had an interim recertification performed for a decrease in adjusted income (whether for earned income, unearned income, or a combination of the two) since their last annual recertification. The PCHA will also process an interim recertification for any other increases in <u>**unearned**</u> income (i.e. Pension, SSI, SSA, etc.) that meet the 10 percent threshold. The PCHA will not perform an interim recertification when a family reports an increase in income **(whether earned or unearned income)** within three months of their annual recertification effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases.

<u>Interim Reexaminations - Reporting Changes & Effective Date</u> **(24 CFR §§ 960.257(b)(4); 982.516(d); 882.515(b)(1) - (4);** 882.808(i)(4); 891.410) Reference: Notice PIH 2023-27/ Attachment I **Families must report all changes in income and household composition, and staff will subsequently determine if the change requires an interim reexamination.**	The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report all changes in income within 10 business days of the date the change takes effect. The family may notify the PCHA either electronically on the PCHA website or in writing. Within 10 business days of the family reporting the change, the PCHA will determine whether the change will require an interim recertification. If the change will not result in an interim recertification, the PCHA will note the information in the tenant file but will not conduct an interim recertification. The PCHA will send the family a written and/or electronic notification within 10 business days of making this determination informing the family that the PCHA will not conduct an interim recertification. If the change will result in an interim recertification, the PCHA will determine the documentation the family will be required to submit based on the type of change reported. The PCHA will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request from the PCHA. This time frame may be extended for good cause with PCHA approval. The PCHA will accept required documentation by mail, email, fax, the PCHA website, or in person. The PCHA will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information. **Changes Reported Timely** If the family reports a change in family income, composition, or other circumstances affecting adjusted income timely in accordance with PCHA policies: • For rent increases, the PCHA must provide the family with 30 days advance written notice. The rent increase is effective the first of the month after the end of that 30-day notice period. • Rent decreases are effective on the first of the month after the date of the actual change leading to the interim recertification of family income. This means the decrease will be applied retroactively. **Changes Not Reported Timely** If the family failed to report a change in family income, composition, or other circumstances affecting adjusted income timely in accordance with PCHA policies: • For rent increases, the PCHA must implement any resulting rent increases retroactively to the first of the month following the date of the change leading to the interim recertification of family income. • For rent decreases, the PCHA must implement the change no later than the first rent period following completion of the interim recertification.

<u>Revocation of Consent Form HUD-9886-A</u> (24 CFR §§ 5.230(c)(5)(iii); 24 CFR 5.232(c); 891.105; 891.410(g)(3)(ii); and 891.610(g)(3)(ii) Notice PIH 2023-27/ Attachment J **The executed consent form will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to the PHA to revoke consent. PHAs must explain to families the consequences, if any, of revoking their consent.**	The PCHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with PCHA policy. In order for a family to revoke their consent, the family must provide written notice to the PCHA. Within 10 business days of the date the family provides written notice, the PCHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the PCHA will notify their local HUD office.
<u>Enterprise Income Verification (EIV) Usage</u> (24 CFR § 5.233) Reference: Notice PIH 2023-27 / Attachment J **PHAs must use HUD's EIV system in its entirety, in accordance with 24 CFR 5.233. PHAs must update their EIV policies and procedures to reflect their discretionary use of EIV reports (e.g., Income Report, zero income reports, New Hires Report, etc.) under HOTMA.**	The PCHA will use HUD's EIV system in its entirety, in accordance with 24 CFR 5.233. The PCHA has updated their EIV Use and Security Policy to reflect mandatory and discretionary use of EIV reports under HOTMA. Report Name and Frequency: • **Debts Owed to Public Housing Authorities & Terminations Report** -– At time of screening for program admission and/or any prospective new household members, also to report any debts owed to PCHA or program terminations with adverse actions • **Existing Tenant Report** – At time of screening for program admission and/or any prospective new household members • **Identity Verification Reports** – Once a month for all residents • **Deceased Tenant Report**– Once a month for all residents • **New Hires Report** – Quarterly for all residents • **Multiple Subsidy Report**– Once a month for all residents • **No Income Reported By Health And Human Services (HHS) or Social Security Administration (SSA)** – Quarterly for all residents • **Immigration Report**– Once a month for all residents • **Summary Report** – Within 120 days of move-in and/or annual recertification effective date • **Income Report** – Within 120 days of annual recertification effective date • **Income Validation Tool (IVT) Report** – Within 120 days of annual recertification effective date. Income Reports will only be used for interim recertifications as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.

<u>Streamlined Income Determinations</u> (24 CFR § 960.257(c)) Reference: Notice PIH 2023-27 / Attachment I **HOTMA did not update or otherwise change the streamlined income determination provision codified in the FAST Act[13] and in HUD's regulations found in 24 CFR §§ 5.657(d), 960.257(c), and 982.516(b); however, PHAs should be aware that the adjustments of non-fixed income sources at annual reexamination using third-party verification must follow the HOTMA income calculation rules.**	The PCHA will use streamlined income determinations where applicable. **If 90 percent or more of a family's unadjusted income is from fixed income sources:** The PCHA will streamline the annual recertification process by applying the verified COLA/inflationary adjustment factor to fixed-income sources. The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year. The PCHA will document in the file how the determination that a source of income was fixed was made. If the family's sources of fixed income have changed from the previous year, the PCHA will obtain third-party verification of any new sources of fixed income. If the family has other non-fixed income, the PCHA will carry over the calculation of non-fixed income from the first year to years two and three. If the family's sources of non-fixed income have changed from the previous year, the PCHA will obtain third-party verification of any new sources of non-fixed income. **When less than 90 percent of a family's unadjusted income consist of fixed income:** The PCHA will apply the verified COLA/inflationary adjustment factor to fixed income sources. All other non-fixed income will be verified using third-party verification as outlined in Notice H 2023-10. **In the following circumstances, regardless of the percentage of income received from fixed sources, the PCHA will obtain third-party verification, as applicable:** Of all assets when net family assets exceed $50,000; Of all deductions and allowances from annual income; If a family member with a fixed source of income is added; If verification of the COLA or rate of interest is not available; During move-in and at least once every three years thereafter.

<u>Income Definitions</u> (24 CFR § 5.609(a); 5.609 (b)(9)) Reference: Notice PIH 2023-27 / Attachment F **Income is now defined broadly with an expanded and clarified list on income exclusion (24 CFR 5.609 (b)). Annual income includes all amounts received from all sources by each adult family member 18 years or older or the head of household or their spouses, plus unearned income by or on behalf of each dependent under 18 years, plus income from assets. Certain financial aid for both full and part time students are excluded from income (24 CFR 5.609 (b)(9)).**	PCHA will comply with mandatory regulation.
<u>Mandatory Deductions</u> (24 CFR § 5.611(a)(1) - (a)(2)) Reference: Notice PIH 2023-27 / Attachment C **1. Dependent Deduction - The dependent deduction amount is currently $480. This amount will be adjusted annually for inflation.** **2. Elderly/Disabled Family Deduction - The elderly/disabled deduction increases from $400 to $525. This amount will be adjusted annually for inflation.** **PHAs will apply the new deduction amount to a family's next annual or interim reexamination, whichever is sooner, following the date on which the PHA implements HOTMA regulations.**	PCHA will comply with mandatory regulation.
<u>Health and Medical Expense Deduction</u> (24 CFR § 5.611(a)(3)) Reference: Notice PIH 2023-27 / Attachment C **Increases the threshold for the deduction of unreimbursed health and medical care expenses plus unreimbursed reasonable attendant care and auxiliary apparatus expenses that enable employment from 3% to 10% of annual income.**	PCHA will comply with mandatory regulation.

<u>Exclusion from Income</u> (24 CFR § 5.609 (b)) Reference: Notice PIH 2023-27 / Attachment G **There are new exclusions from income outlined in 24 CFR § 5.609 (b).**	PCHA will comply with mandatory regulation.
<u>Student Financial Assistance</u> (24 CFR § 5.609 (b)(9)) Reference: Notice PIH 2023-27 / Attachment G **There are now two categories of student financial aid. The first category, is any assistance that section 479B of the Higher Education Act of 1965 (Title IV HEA Assistance), as amended, requires to be excluded from a family's income. The second category is any other grant-in -aid, scholarship, or other assistance amounts an individual receives for the actual covered cost charged by the institute of higher education. The treatment of student financial assistance depends on HUD program, student/household characteristics, and the type of financial assistance received by the student. The student financial assistance rules apply to both full-time and part-time students.**	PCHA will comply with mandatory regulation.
<u>Income from Assets</u> (24 CFR § 5.609(a)) Reference: Notice PIH 2023-27 / Attachment F **Income from assets is considered income. If it is possible to calculate actual returns from an asset, the PHA should use that amount. If it is not possible to calculate an actual return from an asset, the PHA must impute income from assets based on the current passbook savings rate as determined by HUD when the family has net assets over $50,000 (adjusted annually for inflation).**	PCHA will comply with mandatory regulation.

<u>Exclusion from Assets</u> (24 CFR § 5.603(b)(3)) Reference: Notice PIH 2023-27 / Attachment F **There are new exclusions from assets, including related to necessary items of personal property, non-necessary items of personal property when the total value does not exceed $50,000 (adjusted annually for inflation), and real property that the family does not have the legal authority to sell.**	PCHA will comply with mandatory regulation.
<u>Calculation of Income</u> (24 CFR § 5.609(c)) Reference: Notice PIH 2023-27 / Attachment B **For initial occupancy/assistance and interim reexaminations, the PHA must estimate the family income for the upcoming 12-month period using current income. For all annual reexaminations, the PHA must determine the family income for the previous 12-months unless using a streamlined income determination, taking into account any redetermination from an interim reexamination and any unaccounted for income changes.** **Note: PHA must obtain at least two current and consecutive paystubs and a minimum of one statement that reflects the current balance of banking/financial accounts.**	PCHA will comply with mandatory regulation.
<u>Elimination of the Earned Income Disregard</u> (24 CFR § 5.611) Reference: Notice PIH 2023-27 / Attachment G **The Earned Income Disregard (EID) will not apply to any family who is not eligible for and already participating in the disallowance as of December 31, 2023. Families receiving the benefit as of December 31, 2023 may continue to receive the full benefit until the remaining timeframe for an individual family's EID expires. Because the EID Last up to 24 consecutive months. no family will still be receiving the EID benefit after December 31, 2025.**	PCHA will comply with mandatory regulation.