



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

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TO: Monitoring Agents, Sponsors and Property Managers of DHCD-Assisted Projects
FROM: Department of Housing and Community Development, Division of Housing Development (DHCD)
SUBJECT: Exclusion of income derived from temporary 2020 Census Bureau work
DATE: February 5, 2020

This memorandum provides monitoring agents, sponsors and property managers of certain DHCD-assisted projects with guidance regarding the treatment of income derived from temporary 2020 Census Bureau employment. This memorandum is applicable to the following DHCD programs:

- National Housing Trust Fund (HTF)
- Low-Income Housing Tax Credits (LIHTC)
- HOME Investment Partnerships Program (HOME)
- Affordable Housing Trust Fund (AHTF)
- Commercial Area Transit Node Housing Program (CATNHP)
- Capital Improvement Preservation Fund (CIPF)
- Community Based Housing (CBH)
- Facilities Consolidation Fund (FCF)
- Housing Innovations Fund (HIF)
- Housing Stabilization Fund (HSF)
- Local Initiative Program (LIP)
- Homeownership Opportunity Program (HOP)

Temporary Census Bureau Income Exclusion

The U.S. Census Bureau is temporarily employing thousands of people, many of whom are low or moderate income earners, to begin temporary work for the nationwide Decennial Census in the spring of 2020.

On March 7, 2017, the U.S. Department of Housing and Urban Development Office of Public and Indian Housing issued [Notice PIH 2017-05 \(HA\)](#) to clarify that, pursuant to Section 24 CFR 5.609(c)(9), temporary, nonrecurring and sporadic income is not included when public housing agencies are determining a household's annual income. The Notice provides that, under this exclusion, temporary income payments from the U.S. Census Bureau, defined as employment lasting no longer than 180 days per year and not culminating in permanent employment, are to be excluded from a household's annual income. The Notice further provides that other HUD grantees subject to the definition of annual income in 24 CFR 5.609 should also exclude these temporary income payments when calculating a household's annual income. As administered by DHCD, 24 CFR 5.609 is used to calculate household annual income for the federal programs listed above: HTF, HOME, and LIHTC.¹

DHCD is pleased to announce that, **effective immediately, income derived from temporary 2020 Census Bureau employment is to be excluded from households' countable income calculations for projects that involve any of**

¹ For HOME, please see 24 CFR 92.203(b)(1). For LIHTC, please see 26 USC 42(g)(4). For HTF, please see 24 CFR 93.151(b)(i).

the DHCD-assisted programs listed above. This instruction to exclude temporary 2020 Census Bureau employment income also applies to DHCD-assisted projects that involve any of the programs listed above for which 24 CFR 5.609(c)(9) is not used to determine household annual income so long as they remain in compliance with any other applicable state or federal requirements by doing so.

When a household reports U.S. Census Bureau earnings, please inquire whether the employment is expected to be temporary or permanent. In general, temporary 2020 Census Bureau employment is nonrecurring, for a limited period of time, and may last a few weeks to several months. Typical positions are expected to last about four to eight weeks and hours are expected to range between 20 and 35 hours/week. However, hours of work may be reduced if there is a lack of available work. The employment is not expected to lead to permanent positions and may end at any time. Temporary 2020 Census Bureau employees are paid weekly either through direct deposit or a paycheck mailed to the person employed. Income for any household members that have permanent or non-temporary U.S. Census Bureau employment should be counted in calculating a household's income.

Questions

If after reading this memorandum you have questions, please contact Matthew Seadale at 617-573-1317.