4.5 Income, Stipends, Pay and Benefits

OC28. Are the Economic Impact Payments (also known as stimulus payments) of up to $2400 to individuals authorized by Congress for COVID-19 relief considered annual income? (Updated 3-24-21)

A. No. Pursuant to 24 CFR 5.609(c)(9), annual income does not include temporary, nonrecurring or sporadic income. Any additional future one-time stimulus payments made directly to individuals and families would be excluded from annual income, as they are temporary, nonrecurring payments.

OC29. Should PHAs consider regular unemployment benefits as income and/or unemployment from the CARES Act? (Updated 3-24-21)

A. Regular unemployment benefits will continue to be considered income. The CARES Act had three provisions to strengthen and extend unemployment benefits; two of which will be included in the income calculation, and one will be excluded in the income calculation:

1. Section 2102: Pandemic Unemployment Assistance (PUA) expands the qualification of unemployment insurance (UI) for people that are self-employed, work part-time, or who would otherwise not qualify for regular UI – this benefit will be for 39 weeks. PHAs shall include PUA in the income calculation, as it mirrors the regular UI benefit, which is included in income under 24 CFR 5.609(b)(5).

2. Section 2104: Federal Pandemic Unemployment Compensation (FPUC) program is providing $600/week for 18 weeks as an enhanced unemployment benefit. PHAs shall exclude the $600 per week enhancement provided by the CARES Act because these payments are temporary and likely non-recurring.

3. Section 2107: Pandemic Emergency Unemployment Compensation (PEUC) program allows regular unemployment compensation to receive up to 13 weeks of additional benefits (this extends regular UI from 26 weeks to 39 weeks in total). PHAs shall include PEUC in the income calculation, as it is simply an extension of regular UI benefits.

HUD is aware of an unemployment extension in the 2021 Consolidated Appropriations Act and is evaluating the impact to income calculations. HUD will provide an updated guidance for income calculation soon.