

SEATTLE INCENTIVE PROGRAMS INCOME CERTIFICATION PROCESS

The following guidance is intended for the City of Seattle Affordable Housing Incentive Programs: Multifamily Tax Exemption (MFTE); Incentive Zoning (IZ); and Mandatory Housing Affordability (MHA). In the event of a conflict between this guidance and Seattle Municipal Code (SMC), or passages specific to a property's affordable housing covenant, SMC and/or the covenant will take precedence. Links are intended for convenience only and Owners are expected to reference the correct legal requirements regardless. Direction is not intended for affordable housing obligations administered by entities other than the City of Seattle. This chapter is effective 6/17/2019 and supersedes any prior direction on the income certification process for Seattle's Incentive Programs.

A. INCOME CERTIFICATION- OVERVIEW

It is the Owner's responsibility to rent Designated Units to income eligible occupants. Designated Units are income and rent restricted units required to meet the affordability obligations outlined in the recorded affordable housing agreement for the Incentive Program(s). Income eligible occupants have a total household annual income from all sources at or below the maximum allowable household income restriction for the unit. A household's income must be certified using source documentation to verify all amounts anticipated to be earned over the income projection period. The income projection period is the 12 months following the initial lease start date. The initial lease start date is also referred to as the **certification effective date**. Current income amounts will be projected forward over the 12-month period unless there is verifiable evidence of an anticipated change, such as a raise, change in position, cost of living adjustment, etc. If there is a history of receiving income (bonuses, tips, commissions), this will be projected forward if it could reasonably be anticipated, even if the employer cannot guarantee it will be received. Lapses in income resulting from voluntary leave, medical leave, or a voluntary reduction in hours will not be taken into consideration in the income calculation- income will be annualized as if it will be received.

All households applying to the Incentive Program(s) must be certified as income eligible prior to signing a lease for a Designated Unit. Income certifications must be conducted no more than 120 days prior to the certification effective date (the start date of the initial lease) to be considered valid. Certifications occurring more than 120 days in advance of the lease start date are no longer considered valid projections and will not be accepted. Households may not sign a lease for a Designated Unit based on a partial or preliminary income certification. Properties that complete income certifications after signing a lease, or that base eligibility on a certification older than 120 days, will receive compliance findings and may jeopardize their participation in the program.

In most cases, additions or changes to the adult household members after move-in require that a new certification be completed. A change may not be made to the adult household members without first determining the new household's eligibility, except under limited circumstances. Transfers in the same building to another Designated Unit that result in a change in the unit's %AMI restriction or # of

bedrooms will also require a new certification. If the income certification determines that the household is now ineligible, the next available unit must be designated in the household’s place. Once this occurs, the property may provide the required notice to the ineligible household and revert their unit to market rate.

The requirement for households to complete **annual income recertifications** is dependent on program participation and therefore applies to some properties and not others. The below table shows the move-in and annual recertification requirement by program.

	MFTE P3	MFTE P4	MFTE P5	MHA	IZ
Move-in certification	Yes	Yes	Yes	Yes	Yes
Annual income recertification	No	No	Yes	Yes	See Covenant

MOVE-IN INCOME CERTIFICATION PROCESS

Move-in income certifications for each of the Incentive Programs (MFTE/IZ/MHA) follow the same process:

- 1.) Income Disclosure-** Adult applicants disclose all income and assets anticipated to be available to the household for 12 months following the lease start date.
- 2.) Income and Asset Verification-** Property obtains income and asset documentation to verify all sources disclosed by applicants on the REA.
- 3.) Income Calculation-** Property calculates total household income based on verified documentation (and not applicant’s self-disclosed amounts)
- 4.) Eligibility Determination-** Property compares total household income to income cap for household/unit and makes eligibility determination.

Each of the above steps is described in detail below.

1.) Income Disclosure- Owner will obtain a Resident Eligibility Application (REA) for applicant, to be completed by each adult household member. The REA is the applicant disclosure of all anticipated incomes sources and assets available to the household over the twelve months following the certification effective date (initial lease start). The REA must be completed even if no income sources are anticipated to be available to an applicant. To be accepted, the property must ensure the following:

- The REA must be completed in full to be considered a valid disclosure. Each income and asset source must have a “Yes” or “No” response. If a “Yes” response, the associated gross annual income or asset value must be entered.
 - If an applicant has an asset with a current value of \$0, applicant should answer “Yes” and enter \$0 for the value. It is not acceptable to leave field blank.

- Gross annual income (before taxes) will be reported in all instances except for self-employment income where the net earned from the business will be used.
 - Applicants may not omit information on bonuses, tips and commissions on account of them not being “guaranteed” by employer. If there is a history of receiving income from any of these sources, they must be disclosed.
- The Owner is responsible for ensuring the REA provides the requested information. For example, if the applicant enters “\$15.00” as the gross annual income from employment, a clarification should be requested. It should not be assumed that \$15.00 is the hourly wage or that employment is full-time.
- The property and the applicant(s) will sign the REA prior to collecting any income or asset documentation. Once complete and signed, move on to step 2.)

2.) **Income and Asset Verification- Owner will request documentation to support all amounts disclosed on the applicant’s REA.** Each income source disclosed by the applicant must be supported by documentation. The documentation will be the basis for the final household income calculation.

- Employment income must be verified by the property Owner using an **Employment Verification Form** sent directly to the employer and returned to the property directly by the employer. The Office of Housing recommends obtaining at least one current paystub to supplement the information provided by the employer. When returned incomplete, a written clarification must be requested of the employer.
 - Once two or more **documented** attempts have been made to obtain an Employment Verification Form from the applicant’s employer with no success, Owners may instead verify income based on the six most recent consecutive paystubs. If paystubs are not available due to the applicant having recently started the position, management may then document income through an employment offer letter.
- All forms of unearned income (Social Security, child support, alimony, unemployment benefits, etc.) must be verified.
- All assets must be verified. Only the income earned from assets in the form of interest, dividends, or other recurring distributions will count as income, not the value of the asset (e.g., the interest on a savings account would count as income, not the current account balance or withdrawals). Once all income for all income sources is available, move on to step 3.)
 - **The Office of Housing is no longer accepting the Under \$5,000 in Household Assets Certification Form for the Affordable Housing Incentive Programs.**

3.) **Income Calculation and Eligibility Determination-** Owner will calculate the total gross household income based on the verified income documentation and enter information into the Household Eligibility Certification (HEC).

- Move-in household income is always based upon current income, annualized and projected forward for the next 12 months after the initial lease start date.
 - Any verifiable anticipated changes, such as raises, cost of living adjustments, bonuses, etc. must be incorporated into the 12-month projection.
- When calculating the total household gross income, add all income (regardless of earned, unearned or from assets) in exact amount down to the cent, then **round only the final gross amount**. If 49 cents and below, round down, if 50 cents and above round up to next dollar.
- All income calculations will be documented by the Owner and retained on file for review during audit. Owners may choose whether they use City of Seattle published income calculators or their own (calculator tape, management company calculation sheets, etc.) however, the inputs must be shown, and the formulas must be identical to those required by the Office of Housing. Once the HEC is complete with all documentation and calculations supporting a final household income figure, move on to step 4.)

4.) **Eligibility Determination-** If the total household income calculated in the HEC is at or below the maximum income for the unit, the household is eligible for the program. All information will be entered by the property into the **Household Eligibility Certification (HEC)**. The applicants and property must sign the HEC for it to be effective. Only once the HEC has been completed in full, demonstrates eligibility and has been signed by both parties may the applicant sign a lease for a Designated Unit.

B. INCOME INELIGIBLE HOUSEHOLDS AT MOVE-IN

When an Owner denies an over-income applicant to a Designated Unit participating in one or more of the Affordable Housing Incentive Programs, notice of the determination should be provided to the applicant and all income certification documentation collected to date should be retained on file. An Owner should:

- Provide written notice of adverse action ([RCW 59.18.257](#)) to the applicant of why they were determined ineligible for the unit
- Provide the final income calculations from the Household Eligibility Certification to the applicant and explain the calculations if requested
 - It is not appropriate to send the applicant to the Office of Housing to explain the calculation conducted by the property. If there is an area of contention, the Owner should contact the Office of Housing directly with a specific compliance-based question.
- Establish basic grievance procedures allowing applicants to clarify income or otherwise provide context that they believe may impact their ineligibility determination.
 - Grievances must be based on a clarification of an applicant's income that may impact the eligibility determination. Clarifications should never be understood as allowing an exception to established program rules. The AHIP Programs **do**

not allow for exceptions to the income eligibility criteria or methods under any circumstance, including but not limited to financial hardship, medical expenses, wage garnishments, need for emergency housing, provided notice to current landlord, etc.

Example. Owner determines that applicant is income ineligible based on full-time employment income entered into the Employment Verification form by an employer. Upon reviewing HEC, applicant notes that they only work part-time, not full-time, and the employer made a mistake. To resolve, Owner requests written clarification from employer as to future amounts anticipated and may request further support for part-time hours by obtaining paystubs and/or employment offer letter. Applicant is confirmed to work part-time and is determined income eligible based on documented clarifications under existing program rules that clearly establish the need for a correction to original calculation.

C. ANNUAL INCOME RECERTIFICATION PROCESS

Properties participating in MFTE program 5, MHA, and some IZ properties (refer to Housing Bonus Covenant) are required to annually income recertify participating households for the duration of the affordable compliance period. Tenants must meet the program recertification criteria annually to continue receiving a rent restriction on their unit. Properties participating in MFTE program 3 and 4 are not required to complete annual tenant income recertifications.

The **annual income recertification** process for MFTE Program 5, MHA performance units and select Incentive Zoning units is as follows:

- 1.) **Determine the Recertification Effective Date-** Owner may income recertify households at any point within the 120-day period prior to the recertification effective date for that household
- 2.) **Determine Income Ineligibility Cap-** Once the household's annual income exceeds a program-specific Income Ineligibility Cap upon annual income recertification, the household is no longer eligible for the respective program
- 3.) **Complete Income Certification-** A full income certification will be completed for the household based on income anticipated to be received in the 12-month period following the recertification effective date. (Please note that the incentive programs are not allowing self-certifications at this time.)
- 4.) **Eligibility Determination-** If the total household income calculated in the HEC is at or below the income ineligibility cap for the unit, the household is eligible for the program. All information will be entered by the property into the **Household Eligibility Certification (HEC)**. The applicants and property must sign the HEC prior to signing a lease for it to be effective.

Each of the above steps is described in detail below:

1.) **Determine the Recertification Effective Date-** The **recertification effective date** is the anniversary of the initial lease start date for the remainder of that household's tenancy up to the end of the affordability period.

- The certification can be completed at any point in the 120 days prior to the recertification effective date and is an income projection of the 12 months after the recertification effective date.
- At the Owner's option, the recertification effective date may be pushed back to the 1st of that month.
- The recertification effective date determines when the recertification is required to be completed each year. **The end of a lease term does not dictate when an annual recertification is required.**

Example: If the initial lease commenced on 8/25/2019, the 1st recertification effective date is 8/25/2020. The Owner could opt to use 8/1/2020 as the recertification effective date instead, but not 9/1/2020. The income recertification could be completed at any point in the 120-day period prior to either 8/25/2020 or 8/1/2020.

2.) **Determine Ineligibility Cap-** Tenants are determined to be **income ineligible** for the program(s) if the household annual income calculated at annual recertification exceeds the ineligibility cap established by the program the unit participates in. The income ineligibility caps for the Affordable Housing Incentive Programs are as follows:

- **MFTE Program 5-**Tenants in designated units at properties participating in MFTE Program 5 are income ineligible when their household income exceeds 1.5x the income limit applicable to the unit on the recertification effective date, taking into account the %AMI of the unit and the household size upon the recertification effective date.

Code Reference: [SMC 5.73.020](#)

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- **Mandatory Housing Affordability Performance Program-**Tenants in designated units at properties that elected the MHA Performance option are determined income ineligible dependent on the recertification %AMI (see below), which is based on the square footage of the unit:
 - For units with net unit area of 400 square feet or less with initial income restriction at 40%AMI, household is ineligible once income exceeds the 60%AMI limit effective upon annual recertification.
 - For units with net unit area greater than 400 square feet with initial income restriction at 60%AMI, household is ineligible once income exceeds the 80%AMI limit effective upon annual recertification.

The max income figure is determined by the recertification %AMI and household size upon the recertification effective date. Note that **the rent limit never adjusts to 60%AMI and**

80%AMI respectively upon recertification- the adjusted %AMI listed above refers to the income ineligibility cap on recertification only. The units will remain at their initial 40%AMI or 60%AMI designation for the purpose of determining rents for the remainder of the affordability period.

Code Reference: [SMC 23.58C.050.C.3.](#)

- **Incentive Zoning Program-** Tenants in designated units at properties that participate in the Incentive Zoning program may or may not have an annual recertification requirement. Owners should review the Housing Bonus Covenant for requirements specific to the property. When an annual recertification requirement is mentioned, the ineligibility cap should be interpreted as 1.5x the income limit applicable to the unit on the recertification effective date, taking into account the %AMI of the unit and the household size upon the recertification effective date.

Reference: Housing Bonus Covenant, publicly available through an online record search of the King County Recorder's Office [website](#), or the Office of Housing.

3.) Complete Income Recertification- Annual income recertifications are required to be completed in full, using steps 1-3 of the move-in income certification found above on pages 2-4. The income recertification is valid only if completed within the 120 days prior to the recertification effective date and is intended to capture income anticipated to be earned over the 12 months after the recertification effective date.

- The annual income recertification requires a new and current REA income disclosure, new and current income and asset documentation and an updated HEC based on the newly obtained information. Prior income verification documentation (employment verifications, bank statements, etc.) cannot be reused, even if the income sources are the same.
- It is recommended that the income recertification process be started at least 2-3 weeks before the recertification effective date to avoid issues.
- Tenants that do not respond to written requests by the Owner to obtain recertification documents requests may be determined ineligible if the property is unable to complete an effective date (anniversary of initial lease commencement). **This assumes that the Owner has provided adequate notice to the tenant of the need to certify.** In such a case, retain all communications with the tenant.

4.) Eligibility Determination- The annual recertification will always lead to one of two outcomes based on the recertified household's total anticipated income in relation to the program specific Income Ineligibility Cap:

The household's total annual income at recertification is at or below the ineligibility cap- The household will remain in the program and continue to receive the rent

restriction on their unit until they fail an income recertification, or the end of the affordability period, whichever comes first.

Or:

The household's total annual income at recertification exceeds the ineligibility cap- The next available comparable unit will be designated for the program, at which point the now ineligible household will no longer be considered a designated unit for the program(s). See Available Unit Rule section below (page 8) for more detail on this process.

Please note that an income ineligibility determination for any of the incentive affordable housing programs does not provide justification for an eviction and does not necessitate transferring the household to another unit. An ineligibility determination does not confer a right to the property to increase the rent during a fixed term lease and all periods of written notification must be followed when the Owner intends to increase the rent.

D. AVAILABLE UNIT RULE

The Available Unit Rule takes effect when a household in a Designated Unit is determined to be **income ineligible** upon an annual income recertification.

When a household is determined to be ineligible upon recertification, the Owner is required to designate the next available comparable market rate unit as income/rent restricted and lease to an income eligible occupant. The previously market rate unit effectively replaces the now ineligible household's unit as one of the required Designated Units.

The ineligible household will continue to pay the program determined restricted rent until the next available unit is designated and available to be occupied by an income eligible household.

Once the next available comparable market rate unit is designated as rent/income restricted for the respective program, effectively replacing the now ineligible household's unit, the ineligible household is no longer considered a Designated Unit. They can now be leased to at the market rate.

The Owner can only increase the ineligible household's rent to market rate if the building is in compliance with its original required Designated Unit mix. Rent increases may not occur during a fixed-term lease. Owners must provide required written notice of a rent increase as follows:

- **MFTE Program 5 and Incentive Zoning units that require recertification-** Follow standard notification periods for rent increases in the City of Seattle. Thirty (30) days written notice ([RCW 59.18.140](#)) or 60 days' written notice for an increase in periodic or monthly rental rate to the same tenant for the same unit and services of >10% in a 12-month period ([SMC 7.24.030](#)).

- **MHA-Performance Option-** Upon the transfer of the affordability restriction to a new unit (i.e. the day it becomes vacant or is leased to a new income eligible occupant), the Owner shall give the ineligible household six months’ notice prior to any rent increase (SMC [23.58C.050.C.6.f.](#))

The MHA program and Incentive Zoning Program require review and approval prior to designating a different unit for the program. Please contact Office of Housing compliance staff.

- **Incentive Zoning-** Housing Bonus Covenants typically allow the Owner to substitute, “For any Designated Unit that is vacant or occupied by a family that is no longer a Low-Income Household, another vacant Unit in the project of at least equal floor area and number of bedrooms, after prior written notice to OH, provided that the Unit becoming a Designated Unit complies fully with the terms of this Agreement, including its occupancy and Rent.” See Housing Bonus Covenant, Paragraph 2.
- **MHA-Performance Option-** If, based on any certification, a previously eligible household occupying a unit designated for MHA performance is determined to be ineligible due to exceeding the maximum income limits, the unit substituted is required to be reviewed by the Seattle Department of Construction and Inspections in consultation with the Office of Housing. See also [SMC 23.58C.030A.6.](#) and SMC [23.58C.050.C.6.f.](#)

Code Reference:

- **MFTE Program 5-** [SMC 5.73.105.D](#)

MFTE Program 5 Ineligibility Example: *Tenant A is a 1-person household applying for a 75%AMI 1-bedroom unit at a building participating in MFTE Program 5. The lease will commence on 7/15/2017, so the move-in maximum income is \$50,400 (2017 Schedule). The household income certifies at \$45,000, is deemed income eligible at move-in and signs a lease. The first annual income recertification must be completed no later than the **recertification effective date** of 7/15/2018. The property management can bump the date back to the first of the month at their option, so in this example 7/1/2018. The annual income recertification can then take place at any point in the 120 days prior to the adjusted recertification effective date of 7/1/2018.*

The 2018 75%AMI 1-person income maximum applicable at the time of the annual income recertification is \$52,650. The income ineligibility cap for annual recertification is 1.5x that amount, for \$78,975.

If the applicant got a new job since move-in and is determined to have an anticipated household annual income of \$70,000 upon recertification, they are still eligible. However, if the income earned was \$80,000 on recert, the household is now ineligible due to exceeding 1.5x the income limit effective upon recertification. If the tenant is ineligible, the next available comparable unit (a 1-bedroom in this case) would have to be designated immediately. Once this occurred, Tenant A would revert to market rate at the next available opportunity (lease renewal or month-to-month status) once the required written notice of a rent increase was provided (30 or 60 days depending on whether a $\geq 10\%$ increase in housing costs).

MHA Performance Option Ineligibility Example: *Tenant B is a 1-person household applying for a 385 square foot studio designated for the MHA performance program. The unit is rent/income restricted at 40% because it is less than 400 square feet in net area. Based on a lease commencement date of*

6/25/2017, the 2017 income and rent schedule applies and the move-in maximum income is \$26,880. The household income certifies at \$25,000 so is deemed income eligible and allowed to sign a lease. The first annual income recertification must be complete no later than the **recertification effective date of 6/25/2018**. The property management can bump the date back to the first of the month at their option and does so in this example to 6/1/2018. The income recertification can then take place at any point in the 120 days prior to the adjusted **recertification effective date** of 6/1/2018.

In MHA, ineligibility limits at recertification are based on the unit %AMI restriction. A 40%AMI unit will have a 60%AMI ineligibility restriction and a 60%AMI unit will have an 80%AMI ineligibility restriction. As this example is an annual recertification, the 2018 60%AMI 1-person income maximum of \$42,150 is applicable.

If the applicant obtained different employment since move-in and earns \$38,000 upon recertification, the household is still eligible. However, if the income earned was \$45,000 on recert, the household is now ineligible. If the tenant is ineligible, the property must contact the Office of Housing for approval of the next available comparable unit (a studio in this case), which would be designated immediately upon vacancy. Once this occurred, Tenant B would revert to market rate at the next available opportunity (lease renewal or month-to-month status) once the required written notice of a rent increase was provided. MHA requires a 6-month notification period once the affordability designation has transferred before a rent increase can take effect.

E. CIRCUMSTANCES AFTER MOVE-IN THAT REQUIRE INCOME CERTIFICATIONS

The above section covers annual income recertifications required by properties participating primarily in MFTE Program 5 and MHA. Income certifications are also required in Designated Units at all properties in situations where there is a change in the adult household composition or a unit transfer that results in change of the %AMI restriction or a change in the # of bedrooms. Income certifications due to these changes do not use the income recertification cap under any circumstances (such as 1.5x current cap for MFTE Program 5), but instead use the current cap for the unit, just as if the household is a new move-in.

Unless an exception applies (see below), Owners must complete income certifications for households in designated units **prior** to changes being made. The income maximum will be based on the schedule effective the date the change is anticipated to be made, adjusting for the new household size if applicable. The date of the change will be the household's new income certification effective date. If the Owner is required to complete annual income recertifications, the first recertification will be due on the anniversary of this date.

Example: Household AB is determined to be income eligible and moves in on 4/1/2019. A intends to add household member C on 10/1/2019. Owner will complete an income certification for ABC based on the 3-person income limit effective 10/1/2019 and only makes the change if the household is eligible. The new recertification effective date will be 10/1 each year going forward.

If the income certification verifies that the household is now income ineligible, the change can be made if the property otherwise approves and the Owner commits to designating next available comparable unit for the respective program. Once this occurs, the ineligible household will then revert to market rate at the next opportunity.

The Office of Housing (OH) does not approve changes of household members or transfers- OH only establishes when income certifications are required to determine continued program eligibility. Income Eligible Occupants that do not report household changes (including additions, changes, subleases, use of unit or room for AirBnB, etc.) to Owners will be removed from the program at the next available opportunity. References to prior program rules, or unfamiliarity with the current program rules, will not be the basis for an exception in this regard.

F. CHANGE TO ADULT HOUSEHOLD MEMBERS- CERTIFICATION REQUIRED

Income Certifications are required in the following circumstances prior to making a change to the adult household composition:

- Household requests an **addition of an adult household member**
 - **Example:** *Income eligible household member A requests the addition of new household member B. An income certification of household AB at the current income maximum for unit is required prior to making the change.*
- Household requests **change of a current adult household member** for a new household member
 - **Example:** *Income Eligible household AB wants to release B from the lease, adding adult household member C. An income certification of household AC at the current income maximum for unit is required prior to making the change.*
- Household requests the **removal of an adult household member <12 months** after the initial lease start date (move-in):
 - **Example:** *Household AB requests that B be removed from the lease 4 months after move-in. An income certification of the remaining household member is required prior to making the change.*
 - The income certification is required when it is documented that a resident is no longer living in the unit and/or has established residency elsewhere. Residents that do not report a change in the household composition to the Owner may be removed from the program regardless of any later determination of income eligibility.
 - If the removal of an adult household member occurs ≥ 12 months after the initial lease commencement, an income certification is not required. However, any addition of a new adult household member will require an income certification.

G. CHANGE TO ADULT HOUSEHOLD MEMBERS- NO CERTIFICATION REQUIRED

The Programs **do not** require an income certification within the 12 months after the initial certification effective date due to a change in adult household composition stemming from:

- A restraining order, stalking or domestic violence situation involving household member
- Death, illness, or disability of a household member
- Call of household member to military service
- Divorce or legal separation

Changes or additions to minor household members after move-in, whether through pregnancy, adoption, or required by a parenting plan do not trigger an income certification.

H. UNIT TRANSFERS- CERTIFICATION REQUIRED

Income Certifications are required in the following circumstances when a unit transfer results in changes to the unit type or affordability restrictions:

- Household requests a **transfer to a unit that is a different type (as determined by program)**
 - *Example: Household A requests a transfer from an 80%AMI studio to an 80%AMI 1-bedroom. An income certification is required prior to making the change.*
 - *Note the unit type is based on the Program's determination of the unit's bedroom size for purposes of determining rents. For example, if a household requests a transfer from a designated Studio to an Open 1-bedroom that is considered by the MFTE program to be a Studio for the purpose of rents, no certification is required. However, if the Open 1-bedroom was defined as a 1 bedroom, an income certification would be required in this example.*
- Household requests a **transfer to a unit with a higher or lower %AMI than the current unit**
 - *Example: Household AB requests a transfer from a 75%AMI unit to an 85%AMI unit, or a transfer from a 75%AMI unit to a 65%AMI unit. An income certification is required in both cases prior to making the change.*

For transfers between Designated Units that require an income certification, the household must be eligible in order to make the change.

I. UNIT TRANSFERS- NO CERTIFICATION REQUIRED

The Office of Housing **does not** require an income certification after move-in due to a unit transfer in the following situations:

- Household requests a **transfer to a unit that is the same %AMI restriction and same unit type (as determined by program)**
 - *Example: Household A requests a transfer from a 75%AMI 1-bedroom to a 75%AMI 1-bedroom. No income certification is required.*
- **Household requests a ADA reasonable accommodation** that is approved by Owner and would result in a unit transfer, and initial income at move-in would qualify under the %AMI cap for the unit.

The Office of Housing does not approve reasonable accommodation requests. OH only establishes that an income certification is not triggered due to a transfer when the Owner has granted a reasonable accommodation and the required Designated Unit mix continues to be met.