

NAHRO Presents

HOTMA

Sections

102, 103, 104

Sept. 14, 2023



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building communities together

TODAY'S PRESENTERS

Eric Oberdorfer

Director, Policy and Program
Development

NAHRO

AGENDA

1. Background
2. Section 102: Income Reviews
3. Section 104: Asset Limits
4. Section 103: Income Limits in Public Housing



Background

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT”

- The Housing Opportunity Through Modernization Act (HOTMA) of 2016
 - Signed into law by President Obama in July 2016
- HUD responsible for implementation of the law
- Includes HUD’s Offices of Community Planning and Development (CPD) and Public and Indian Housing (PIH) among other offices

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT”

- Self-Implementing Provisions (*Federal Register* Notice)
- Limited Operating Fund and Capital Fund Fungibility
- Inspections of Dwelling Units – Notice PIH 2017-20 (HA)
- Units Owned by a PHA – Notice PIH 2017-21 (HA)
- Project-Owned Voucher – Notice PIH 2017-21 (HA)
- “Housing Opportunity Through Modernization Act of 2016 – Housing Choice Voucher (HCV) and Project-Based Voucher Implementation; Additional Streamlining Changes” Proposed Rule (Oct. 2020)

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT: IMPLEMENTATION OF SECTIONS 102, 103, AND 104 PROPOSED RULE”

- In September 2019, HUD released a proposed rule on implementing certain provisions of HOTMA
- The proposed rule focused specifically on 3 sections of HOTMA
 - Section 102 – Income Reviews
 - Section 103 – Over-Income Tenants of Public Housing (in effect)
 - Section 104 – Asset Limitations

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT: IMPLEMENTATION OF SECTIONS 102, 103, AND 104 PROPOSED RULE”

- The proposed rule also included certain provisions related to program changes in HUD’s Office of Community Planning and Development (CPD)
 - Housing Opportunities for Persons with AIDS (HOPWA)
 - The HOME Investment Partnerships Program (HOME)
 - Housing Trust Fund (HTF)

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT: IMPLEMENTATION OF SECTIONS 102, 103, AND 104 PROPOSED RULE”

- NAHRO submitted comments on the proposed rule in November 2019
- HUD publicly previewed the final rule on January 31, 2023

“HOUSING OPPORTUNITY THROUGH MODERNIZATION ACT”

- HUD Published final rule implementing Sections 102, 103, and 104 of HOTMA
- Overincome Households in Public Housing – Section 103
- Income Reviews – Section 102
- Asset Limits – Section 104
- ACOPs to be updated by **Jan. 1, 2024** (except 103)*
- Compliance with Sections 102 and 104 by **January 1, 2025**

INCOME REVISIONS REGULATIONS

- Earned Income – 5.100
- Annual Income Definition – 5.609(a)
- Annual Income Exclusions – 5.609(b)
- Annual Income Calculation & Reexaminations – 5.609(c)
- Adjusted Income Mandatory Deductions – 5.611(a)
- Adjusted Income Annual Deductions – 5.611(b)
- Adjusted Income Financial Hardship Exemptions – 5.611(c)
- Income reexaminations – 5.657
- Enterprise Income Verification System – 5.233
- Net Family Assets Definition – 5.603
- Asset restriction – 5.618



SECTION 102: INCOME REVIEWS

CALCULATION OF FAMILY INCOME

Income Reviews

- Current year income at initial eligibility
- Current year at interim reexamination
- Prior year income after initial eligibility
 - PHAs may adjust income as needed
 - Either due to reexam, or changes in income not accounted for in reexam

CALCULATION OF FAMILY INCOME

Income Definition

- All amounts, not specifically excluded, received from all sources by each household member who is:
 - 18 years of age or older
 - The head of household or spouse of the head of household (any age)
 - Unearned income by or on behalf of each minor dependent
 - Actual income from assets
 - Imputed return on assets over \$50,000

CALCULATION OF FAMILY INCOME

Earned Income Definition

- Wages, tips, salaries, other employee compensation, and net income from self-employment
- This includes independent contractors, day laborers, and seasonal workers

CALCULATION OF FAMILY INCOME

- **Independent contractor:** An individual who qualifies as an independent contractor, instead of an employee, under IRS federal income tax requirements and whose earnings are subject to the self-employment tax
- **Day Laborer:** An individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future
- **Seasonal Worker:** An individual who is hired for a short-term position where employment begins about the same time each year. Typically, they are hired to address seasonal demands

CALCULATION OF FAMILY INCOME

Income from Assets

- Income from assets is generally considered income
- If possible to calculate actual returns from an asset, PHAs must use that amount
- If not possible to calculate an actual return on an asset and:
 - The net family assets are \$50,000 or less (adjusted for inflation), the imputed income from the asset is excluded
 - The net family assets are over \$50,000 (adjusted for inflation), the PHA must impute income for the asset (based on current passbook savings rate)¹⁷

CALCULATION OF FAMILY INCOME

Income from Assets

- Certain exclusions apply: covered in Section 104 of HOTMA
- Households may self-certify if assets under \$50,000 (adjusted for inflation)

CALCULATION OF FAMILY INCOME

The following are not considered earned income

- Any pension or annuity
- Transfer payments – payments or income received where no goods or services were offered
 - Welfare
 - Social Security
 - Government subsidies for certain benefits
- Any cash or in-kind benefits

CALCULATION OF FAMILY INCOME

Income Reviews

- PHAs can use TANF, Medicaid, SNAP, LIHTC, WIC, SSI, Earned Income Tax Credit data
 - Possibly additional data sources through a *Federal Register* Notice
 - Families may dispute the determination and agency would need to provide normal income review
- PHAs may identify additional data-sharing opportunities at the state and local level

CALCULATION OF FAMILY INCOME

Verification:

- Verification must obtain the determination using the appropriate third-party verification
 - Verification must indicate family size, composition, and annual income, and be within the appropriate time frame (additional guidance needed)
 - May come from established data sharing agreements, directly from program administrations, or third-party document of a determination provided by the family
 - If the PHA cannot obtain the verification or if the family disputes the determination, the PHA must use another method

INCOME EXCLUSIONS

- Updates the list of income exclusions to mirror HOTMA and eliminates certain non-statutory discretionary exclusions.
 - Removes:
 - Inheritances (considered lumpsums)
 - Capital gains
 - Realized capital gains count as annual income
 - Unrealized capital gains count toward net family assets
 - Gifts (considered lumpsums)

INCOME EXCLUSIONS

- All other exclusions remain
 - HUD has revised some of the language associated with existing exclusions for clarity
 - Final rule includes nonrecurring income and gifts, which proposed rule removed
 - Adds clarity to what **does not** count as nonrecurring income: day laborer, independent contractor, seasonal work

INCOME EXCLUSIONS

- “Non-recurring” income that is excluded:
 - Payments from the U.S. Census Bureau for employment lasting no longer than 180 days
 - Direct federal or state payments for economic stimulus or recovery
 - State or federal refundable tax credits or tax refunds
 - Gifts for holidays, birthdays, or other significant life event or milestones
 - Non-monetary, in-kind donations, such as food, clothing, or toiletries
 - Lump-sum additions to net family assets, including but not limited to lottery winnings

INCOME EXCLUSIONS

- Adds certain new exclusions
 - Income from foster adults
 - Tribal kinship/guardianship care payments
 - Loan payments (student loans, car loans, etc)
 - Payments received by Native American individuals relating to claims of mismanagement of assets held by the U.S. government
 - Annual income replacement “gap” payments that offset rent and utility costs to families that are displaced from one federally subsidized unit to another

INCOME EXCLUSIONS

- Two categories of excluded student financial assistance
 - Any assistance that section 479B of the Higher Education Act of 1965, as amended
 - Including Bureau of Indian Affairs/Education student assistance programs.
 - Amounts in excess of tuition and required fees are **not** excluded for head of household, co-heads, or their spouses, 23 or under, who do not have dependent children
 - Grant-in-aid or scholarship money used by full time students for the cost of tuition, books, room and board, supplies and other fees
 - Does not include “excess” student loans

INCOME EXCLUSIONS

- The student financial exclusion applies to **both part-time and full-time students**
- With both part- and full-time students:
 - Student financial assistance assists the family with the actual education expenses
 - Assistance is limited to costs required and charged to the student by the school
 - Does not include “excess” fees

INCOME EXCLUSIONS

- Adds certain new exclusions
 - Any income received from a retirement account recognized by the IRS
 - Except for periodic payments before the age of 59 ½
- Incorporates other exclusions existing prior to HOTMA in different regulations and statutes

INCOME EXCLUSIONS

- Changes to certain payments to allow individuals with disabilities to live at home
 - No change if the family already received such payment that was excluded from income
 - Eliminates the requirement that these payments offset the cost of services or equipment
 - Exclusion now covers all payments by state Medicaid-managed care system, other state agency, or authorized entity, for caregiving services to enable a family member with a disability to live in the assisted unit

EARNED INCOME DISALLOWANCE

- Removes the Earned Income Disallowance (EID)
 - Earned Income Disallowance prohibited rent increases of certain public housing residents or recipients of Section 8 assistance as a result of increased income due to employment during a 12-month period beginning on the date which the employment started
 - HOTMA removes EID
 - The rule would allow families who currently receive the EID benefit as of the effective date of a final rule to continue receiving the benefits until the allowed time frame expires
 - Within 2 year of a final rule, no families would receive EID

ADJUSTED INCOME

Deductions

- \$525 for elderly and disabled families, adjusted annually for inflation
 - HUD will update annually
- \$480 deduction for families per dependent, adjusted annually for inflation
 - Under 18 years of age
 - Attending school or vocational training on a full-time basis
 - 18 years of age or older and is a person with disabilities
 - HUD will update annually
- Reasonable childcare expenses

ADJUSTED INCOME

Deductions

- Deduction is the sum of the following, to the extent the amount that exceeds 10 percent of annual income
 - Unreimbursed medical and health expenses for elderly/disabled households for amounts over 10 percent of annual income
 - Unreimbursed attended care or auxiliary apparatuses needed by disabled families for purposes of employment for amounts over 10 percent of annual income
- Reasonable child-care expenses needed to enable a family member to be employed or further education, or look for work

ADJUSTED INCOME

- Provides hardships for families who are affected due to the increased threshold of health and medical/attendant care and auxiliary apparatus expense deductions
 - Family must be made aware of changes to health and medical expense deductions before implementation
 - Proposed rule would require PHA to phase in increase to 10 percent
 - Year 1 – deduct expenses exceeding 5 percent
 - Year 2 – deduct expenses exceeding 7.5 percent
 - Year 3 – deduct expenses exceeding 10 percent
- Not available for families that enter the program after Jan. 1, 2024

ADJUSTED INCOME

- A family may also qualify for hardship exemptions for health and medical care expenses/attendant care and auxiliary apparatus expenses if family's costs increased or financial hardship results from changed circumstances
 - Relief ends when the circumstances that made the family eligible for relief are no longer applicable OR after 90-days
 - May extend exemptions for additional 90-day periods at PHA discretion
- Families that received relief via phased-in approach may request hardship under this section

ADJUSTED INCOME

- Provides hardships for families to maintain childcare deduction if the family no longer has a member that is employed or furthering their education
 - Family would have to demonstrate they are unable to pay their rent because of the loss of the childcare expense deduction
 - Childcare is still necessary even though the family member is no longer employed furthering education
 - Hardship provision would expire after 90-days
 - PHA could extend for additional 90-day periods at its discretion

ADJUSTED INCOME

- PHAs must have an established policy for determining a family's inability to pay the rent if they request a childcare hardship
- The family must receive prompt notification in writing of the change in adjusted income and the rent due to the childcare exemption, and date for when the hardship exemption will begin and end

ADJUSTED INCOME

- PHAs can continue to adopt additional deductions from annual income
 - Those deductions cannot materially increase Federal expenditures
 - PHAs that adopt permissive deductions would not be eligible to receive any program funding to cover the increased cost to the impacted program
 - The PHA would have to identify the additional cost of the deduction to HUD and cover the cost
 - Only PHAs, not owners that happen to be PHAs, may adopt additional deductions

INCOME REEXAMINATIONS

- Changes how PHAs are required to review incomes for interims
 - Families may request interim income reviews
 - PHAs may decline interim reviews when it is estimated that a change in income or a deduction will result in a decrease of less than 10 percent in annual adjusted income (standard threshold)
 - PHAs may still process a family request for a smaller decrease, if the PHA has established a more generous standard (a decrease of less than 10 percent of annual adjusted income)
 - PHAs may not establish a less generous standard (a decrease in more than 10 percent of annual adjusted income)

INCOME REEXAMINATIONS

- Changes how PHAs are required to review incomes
 - PHAs **must** conduct an interim review when the family's adjusted income is estimated to have increased by 10 percent or more (**excludes earned income**)
 - Reasonable reexamination processing time should be based on the time it takes to verify information, but generally should not be longer than 30 days

INCOME REEXAMINATIONS

- PHAs cannot consider earned income when estimating whether annual adjusted income has increased
 - Unless increases correspond to a reexam that occurred during the cert. period
 - Earned income: wages, tips, salaries, other employee compensation, and net income from self-employment
 - Earned income does not include any pension or annuity, transfer payment, or any cash and in-kind payment
 - Transfer payments mean payments made or income received in which no goods or services are being paid for, such as welfare, social security, and government subsidies for certain benefits
- Not required if change occurs 3 months before annual review

INCOME REEXAMINATIONS

- WHEN TO DO AN INCOME REEXAMINATION
 - Family requests reexamination
 - Income decreases by 10% (or more generous threshold)
 - Unearned income increases by 10% (unless within last three months of certification period)
 - Earned income increases by 10% AND family had an interim reduction during the certification period (unless within last three months of certification period)

INCOME REEXAMINATIONS

- WHEN NOT TO DO AN INCOME REEXAMINATION
 - Income decreases by less than 10% (or more generous threshold)
 - Earned income increases by 10%
 - Unless family had interim reduction during the certification and annual examination is more than 3 months away
 - Must be based on PHA's written policy

INCOME REEXAMINATIONS

- The Final Rule adds language regarding the effective date of any changes in rent due to an interim reexamination
 - If the tenant complies with interim reporting requirements, the tenant is provided 30 days advance notice of rent increase
 - Rent will be effective the first of the month commencing after the end of the 30-day period
 - If the tenant complies and the rent decreases, the change in rent is effective the first day of the month after the interim certification

INCOME REEXAMINATIONS

- If the tenant does not comply with interim reporting requirements and the tenant has failed to report changes as required:
 - If rent increases – retroactively to the first of the month following when the interim should have occurred
 - PHAs must initiate an interim reexamination and implement any rent increase retroactive to the first of the month following the date of action

INCOME REEXAMINATIONS

- If the tenant does not comply with interim reporting requirements and the tenant has failed to report changes as required:
 - If rent decreases – no later than the effective date of the first rent period following the completion of the reexam
 - Retroactive rent decreases may not be applied by the owner prior to the later of the first of the month following:
 - The date of the change leading to interim reexam
 - Effective date of the family's most recent previous interim or annual reexam
 - Policy may be conditional upon certain circumstances such as not reporting due to a natural disaster

INCOME REEXAMINATIONS

- **Policies:** PHAs must adopt policies consistent with the rule detailing when and under what conditions the family must report a change in family income or composition
- **Retroactive Reexaminations**
 - Any interim reexamination conducted under this final rule may not be applied retroactively to before the effective date of the final rule
 - HUD plans to issue additional guidance on retroactively applying interim reexaminations

DE MINIMIS ERRORS

- PHAs will remain in compliance with income review procedures and calculations if errors made by the agency are within \$30 or less per month
 - \$360 in annual adjusted income per family
 - Final rule changes proposed rule threshold of 5%
 - Allows PHAs to determine de minimis errors on a family-by-family basis more easily
 - Makes errors easier to calculate
- Families not held liable for underpayment
- PHA must reimburse families for overpayment



SECTION 104: ASSET LIMITS

ASSETS RESTRICTIONS

- Two ways to be ineligible for public housing or Section 8 assistance
 - Families with net assets over \$100,000
 - Adjusted each year for inflation (CPI-W) starting in 2025
 - Families would be ineligible for assistance if they have real property suitable for occupancy that the family has ownership interest, legal right to reside in, and authority to sell

NET FAMILY ASSETS

- Net family assets includes:
 - The value of all assets, except those specifically excluded in HQTMA
 - Reasonable costs in disposing some assets may be deducted

NET FAMILY ASSETS

- Revises the definition of “net family assets” to include certain exclusions

NET FAMILY ASSETS

- Exclusions:
 - Property receiving assistance under the homeownership option of the assistance for rental of manufactured housing provided under Section 8
 - Victims of domestic violence
 - Persons selling their house
 - Inaccessible trust funds
 - Retirement accounts
 - Real property that has no legal authority to be sold
 - Educational savings accounts
 - Amounts received from civil action of negligence, malpractice, or other breach of duty that results in a disability

NET FAMILY ASSETS

- Net family assets do not include the value of personal property, except for items of “significant value”
 - Final rule considers items over \$50,000 (excluding “significant items”) to be those of “significant value”
 - Examples of “significant items” include: a car the family relies on for transportation, medical equipment, etc.

REAL PROPERTY

- Families would be ineligible for assistance if they have real property suitable for occupancy that the family has ownership interest, legal right to reside in, and authority to sell
 - If family has property, they must demonstrate that they do not have a present ownership interest in, legal right to reside in, or the legal authority to sell the property
 - Ability to sell is based on the State and local laws of the property's jurisdiction

REAL PROPERTY

- Real property does not include property jointly owned by a member of the family and another individual who would not reside with the family but lives in the jointly owned property
 - Can also apply to instances where a family members owns a fraction of the property among others

REAL PROPERTY

- Final rule provides that a property is not suitable for occupancy if the property:
 - Does not meet the disability-related needs of the family
 - Disability-need for additional bathrooms, physical accessibility requirements, etc.
 - Is not sufficient for the size of the family
 - Provides a geographic 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
 - That it is not safe to reside in because of its physical condition

REAL PROPERTY

- Final rule includes certain exclusion:
 - A manufactured home for which the family is receiving Section 8 assistance
 - Families that receive homeownership assistance from the PHA
 - Persons who are victims of domestic violence
 - As defined by VAWA
 - Families that are offering the property for sale

REAL PROPERTY

- If the family owns property that cannot be legally occupied as a residence, such as a commercial establishment (e.g., convenience store or retail establishment):
 - Considered unsuitable for occupancy
 - However – the real property’s value under HOTMA is the net cash value of the real property after deducting reasonable costs that would be incurred in disposing of the family’s real property:
 - Repayment of mortgage debt or other monetary liens on the real property
 - This amount would be considered annual income and in determining if the family has assets over \$100,000

DELAYED ENFORCEMENT OF ASSET RESTRICTION

- The PHA cannot waive the asset requirements but can delay starting eviction/termination of assistance proceeding for up to 6 months and may allow the family come into compliance during that time:
 - Based on a written PHA policy
 - Only for families going through reexamination (no flexibility for new applicants)
 - Based on eligibility criteria for any reason *without violating fair housing laws*
 - Example: exceptions based on age, disability, income, the ability of the family to find suitable alternative housing, and whether supportive services and being provided

SELF-CERTIFICATION OF ASSETS

- Self-certification for assets less than \$50,000 (adjusted for inflation)
- Families can also self-certify that they do not have any present ownership interest in any real property

FORM HUD-9889 – AUTHORIZATION FOR THE RELEASE OF INFORMATION

- HUD will issue a new version of Form HUD-9886 to be used for reexaminations effective on or after 1/1/24
- After implementation, once an applicant or participation has signed and submitted the form, they will not need to sign and submit subsequent consent forms except when:
 - Anyone 18 years or older becomes a member of the family
 - When a member of the family turns 18
 - As required by HUD or the PHA in the administrative instructions

AUTHORIZATION FOR FINANCIAL DISCLOSURES

- Amends regulations to allow PHAs to obtain financial records from financial institutions and states that a consent form must contain a statement that the authorization to release the information remain effective until the earliest of
 - The rendering of a final adverse decision for an assistance applicant;
 - The cessation of a participant's eligibility for assistance from HUD and the PHA; or
 - The express written revocation by the assistance applicant or recipient of the authorization.

AUTHORIZATION FOR FINANCIAL DISCLOSURES

- PHAs have the discretion to determine whether applicant or recipients are ineligible for benefits if they, or their family members, revoke the authorization to obtain financial records
- Families are still required to provide consent to obtain financial records at the next reexamination
- The PHA may establish an admission and occupancy policy that revocation of consent to access financial records will result in denial or termination of assistance or admission.



SECTION 103: INCOME LIMITS IN PUBLIC HOUSING

OVER-INCOME FAMILIES

- Implements HOTMA's provisions on over-income families in public housing
 - Income limitation on public housing tenancies for families that earn 120 percent of the area median income (AMI) for twenty-four consecutive months
 - HOTMA provides two options for PHAs for over-income families

OVER-INCOME FAMILIES

- PIH Notice 2023-03 (Published March 13, 2023)
 - Provides guidance on how to implement the new income limit
- Over-income provisions became effective **March 16, 2023**
- PHAs must update their ACOP to implement changes and must update the over-income limits in their ACOP no later than **June 14, 2023**

HUD'S CALCULATION OF OVER-INCOME FAMILIES

- Uses calculation of very low-income (VLI) to determine income limits
 - VLIs are 50% of area median family income
 - Includes adjustments:
 - High housing costs
 - Low housing costs
 - State and non-metro median family income adjustments
 - Ceilings and floors for changes

HUD'S DEFINITION OF OVER-INCOME FAMILIES

If a tenant has an income of 240 percent of the VLI threshold for 2 consecutive years



Charge either FMR or monthly subsidy, whichever is greater

-or-

Terminate tenancy within 6 months

CALCULATING MONTHLY SUBSIDY

- Monthly Subsidy provided for the unit:
 - Capital Fund: per unit Capital Fund assistance provided to the PHA for the development in which the family resides for the most recent year Capital Funds were allocated
 - Operating Fund: per unit Operating Funds provided to the public housing development in which the resident resides for the most recent year Operating Funds were allocated
- HUD will publish such funding amounts no later than 12/31 each year in Per Unit Subsidy Report (for 2023, the report will be published “soon.”)

DETERMINATION OF OVER-INCOME LIMIT

- Over-income (OI) Limit must be compared to the family's annual income (**not adjusted income**)
- Includes all families in public housing, including FSS families and families receiving EID (before phase-out)
- PHAs must update income limits no later than 60 days each year after HUD publishes new income limits

OVER-INCOME FAMILIES – FIRST NOTICE

- PHA must document over-income households if the PHA discovers the household is over-income at annual or interim reexamination
- PHA must provide notice to household not more than 30 days after this income determination
- Notice must state:
 - Household has exceeded OI limit
 - Continuing to exceed OI limit for 24 consecutive months will result in the PHA following its OI policy

OVER-INCOME FAMILIES – SECOND & THIRD NOTICE

- PHA must conduct second examination 12 months after interim reexamination if over-income (or 12 months after annual reexam)
- 12 months after second consecutive over-income finding, if still over-income, then PHA must provide written notice no later than 30 days after the PHA's income examination

OVER-INCOME FAMILIES - DOCUMENTATION

- Families not permitted to stay must have their tenancy terminated no later than six months after the second over-income finding
- Before termination, family will still be able to pay income-based, flat rent, or prorated rent for mixed families
 - PHA will need to do reexam during this six-month period (will not impact eligibility)

OVER-INCOME FAMILIES - DOCUMENTATION

- Over-income families that remain in public housing **must sign a new lease with the PHA**
 - Provisions that must be included in the lease are in 24 CFR 960.509

WAITLIST PREFERENCE

- PHAs may adopt a preference for admission of NPHOI families paying the alternative rent and are on a NPHOI lease who become eligible for public housing
 - This allows households to remain in their unit and go back to a PH lease

COMPLIANCE

- PHAs must now report:
 - Total number of OI families residing in PH (through IMS/PIC and soon HIP); and
 - Total number of families on waiting lists for admission to PH (**reporting requirement begins Jan. 1, 2024**) (through Operating Fund Web Portal)
 - Submissions will be due March 31st of each year and should be current as of Dec. 31 of the previous year
 - HUD will publish a report with both data points every April 30th

NAHRO POLICY TEAM CONTACT INFORMATION

- **Eric Oberdorfer**

- Director of Policy and Program Development
- eoberdorfer@nahro.org

- **Steven Molinari**

- Policy Analyst
- smolinari@nahro.org

www.nahroblog.org

- **Tushar Gurjal**

- Senior Policy Advisor
- tgurjal@nahro.org

- **Andrew Van Horn**

- Policy Analyst
- avanhorn@nahro.org

www.nahro.org

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