Housing Division Notice

Date: November 25, 2014

This applicable legislation/policy is to be implemented by the Housing Provider(s) under the following programs:

Please note if your program is **not checked**, this change is **not applicable** to your project.

- [ ] Federal Non-Profit Housing Program
- [ ] Rent Supplement (including former OCHAP/CSHP)
- [ ] Private Non-Profit Housing Program
- [ ] Co-operative Non-Profit Housing Program
- [ ] Municipal Non-Profit Housing Program (Pre-1986)
- [ ] Local Housing Corporation (London & Middlesex Housing Corporation)
- [ ] Housing Access Centre

Subject: **FLUCTUATING INCOME POLICY**

i. **PURPOSE:**
To inform social Housing Providers with delegated responsibility for rent-geared-to-income (RGI) administration of the background and compliance standard, local policy and required action for determining the average monthly income and amount of RGI rent payable for RGI households that have source(s) of income that fluctuate.

ii. **BACKGROUND AND COMPLIANCE STANDARD:**
Many tenants/members have fluctuating incomes due to intermittent or part time employment where the numbers of hours worked in any month could vary substantially. This could result in sharp spikes in rent/housing charges and no opportunity for households to predict the rent/housing charge payable when RGI assistance is calculated each month.
Housing Providers in the City of London and County of Middlesex perform RGI calculations on behalf of the Service Manager. The average family income is being determined in different ways resulting in discrepancies in RGI calculations for households with fluctuating income. The calculation of RGI rent/housing charge each month also results in higher administration costs. A local standards and directives are required to ensure that RGI calculations are performed consistently across the London & Middlesex service area.

The Housing Services Act, 2011 (HSA) and associated regulations do not have specific rules for calculating RGI rent for households with fluctuating income. However, Subsection 50(13) of Ontario Regulation 298/01, allows the Service Manager to develop standard procedures and timeframes for averaging fluctuating income in order to determine the RGI assistance for all households in a consistent and equitable fashion.

Definitions
For the purpose of this policy, fluctuating income is defined as income that:
- is unpredictable, irregular and changes from month to month;
- is generally hourly paid wages where the number of hours worked varies daily or weekly;
- is received from one or more employer(s) during the same month.

Examples of fluctuating income may include, but are not limited to the following:
- Salaried employees who receive frequent bonuses or gratuities
- Temporary employment through an employment agency or regular work with the same or different employers
- Bus or taxi driver
- Home-care provider (i.e. to help people live independently)
- Piece work
- Commission sales

Note: Under this policy, income from Ontario Works (OW) or Ontario Disability Support Program (ODSP), fixed income (e.g., Old Age Security, CPP, or private pension) or seasonal income is not considered fluctuating income. Income for households receiving social assistance or fixed incomes will continue to be reviewed annually. Total earnings from the previous year for households with seasonal earnings will be used to determine average monthly income.

Income of the members of the household is the sum of all payments of any nature (including income derived from a household’s assets) made to, on behalf of, or for the benefit of, the members other than payments excluded under the Housing Services Act, 2011 and associate regulations as amended or any successive legislation that may be enacted for the purpose of calculating rent-gearied-to-income rent.

Average Monthly Income is the total of all payments received during the quarterly reporting period divided by the number of weeks in the period multiplied by 4.333.

iii. LOCAL RULE:

i. Quarterly Reporting Reviews are required for all RGI households with fluctuating earnings. Designated households are required to report income every three months. The Housing Provider will use this information to determine average monthly income and to recalculate the amount of RGI assistance as required. Quarterly Reporting Reviews do not replace the requirement for Annual Reviews of RGI eligibility.
ii. Calculation of rent-geared-to-income (RGI) and verification for households with fluctuating income:

   a) When calculating the rent/housing charge the Housing Provider will determine if the tenant/member has fluctuating income.

   b) Housing Providers will estimate earnings for the first quarterly reporting period for households who already have fluctuating income. Estimates should be based on actual verified earnings and reflect the earnings that are likely to be received by the household over the next three months.

   c) Households who start to earn fluctuating incomes are required to report their income monthly for the first three months. Household rent/housing charge is calculated each month based on the past month.

   d) Households are required to report and verify their income quarterly for the second, third and fourth quarters. Rent/housing charges are recalculated every three months based on the average monthly income from the preceding three months.

   e) If there is a change in the source of income or the income decreases substantially to due extenuating circumstances (e.g., job loss, illness), the rent may be recalculated more frequently than every three months.

   f) If a household member’s income changes from fluctuating to non-fluctuating, the household’s rent/housing charges will be recalculated. RGI will be based on the non-fluctuating income and remain in place until the next annual review or the income changes.

   g) If the household’s income fluctuates for 12 months and the source of the income doesn’t change, the rent for the next year is to be based on the last year’s average income.

   h) If rent/housing charge is increased, the increase will take effect on the first day of the second month following the change in income.

   i) If rent/housing charge is decreased the decrease will take effect on the first day of the month following the change.

   j) An unresolved dispute resulting from a fluctuating rent calculation is subject to both an internal and final review.

   k) Where the pattern of fluctuating income for a household is not clear, Housing Providers have the option of continuing with monthly calculations until the fluctuating income pattern can be established.

   l) Rent/housing charge notice of change, must be in writing and must include the Rent/housing charge amount, Date due, Instructions as to when verification of income is next required, A reminder that if income changes from fluctuating to non-fluctuating, the household composition changes or the source of income changes, the tenant/ member must inform the Housing Provider and Instructions for an Internal Review if the household wishes to dispute the calculation.
iii. **ACTION:**

That Housing Providers implement the new Fluctuating Income Policy based on their annual review process and in accordance with their legislated service target level. The policy, procedures and Service Manager requirements in this Housing Division Notice are to be implemented by all Housing Providers in the City of London and County of Middlesex included under the provisions of the Housing Services Act, 2011, its associated Regulations and Signed Service/Operating Agreements, if applicable.

The Housing Division will review the Housing Provider’s implementation of this policy during the Operational Review process to ensure compliance with legislation and this HDN.

iv. **AUTHORIZED:**

*Original signed by*

[Signature]

Louise Stevens  
Director, Municipal Housing  

**Date:** Nov 25, 2014

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APPENDIX A – Procedures to Determine Average Monthly Employment Income  
APPENDIX B – Sample Letter for RGI Households with Fluctuating Income  
APPENDIX C – Quarterly Reporting Statement (QRS), Information Sheet, Questions & Answers
APPENDIX A – Procedures to Determine Average Monthly Employment Income

Quarterly Reporting Reviews are required for all RGI households with fluctuating earnings. Designated households are required to report income every three months. The Housing Provider will use this information to determine average monthly income and to recalculate the rent as required.

Quarterly Reporting Reviews are a means of both reporting income and determining a monthly average for fluctuating income. They replace all current methods used by Housing Providers to average income. Households with fluctuating earnings must be notified of their responsibility to report their income every three months. Once the household provides this information, the Housing Provider will verify the income, re-determine the average amount of earnings and recalculate rent as required.

Quarterly reporting periods may be different for each household with fluctuating earnings depending on when the household's earnings started or when Quarterly Reporting Reviews were first introduced by the Housing Provider.

Households with Quarterly Reporting Reviews
Only households with fluctuating earnings will be required to complete Quarterly Reporting Reviews.

This includes, but not limited to, households with:
- Employees who are paid at an hourly rate and who do not work the same number of hours from week to week
- Salaried employees who receive frequent bonuses or gratuities
- Temporary employees that work regularly with the same or different employers

It is anticipated that most households with employment earnings will be required to complete Quarterly Reporting Reviews.

Quarterly Reporting Reviews are not required for:
- Households with only fixed income (e.g. Old Age Security)
- Ontario Works or ODSP households with non-benefit income that is below the income threshold
- Seasonal employees that do not have earnings in the off season
- Self-employed households members

Income for these households will continue to be reviewed annually. Income from the previous year for seasonal earnings and self-employment income is averaged over the entire year to determine a monthly amount.

Initial Monthly Estimate of Earnings
Once the Housing Provider has determined that a household is subject to Quarterly Reporting Reviews (after the initial 3 month period), it will estimate the monthly earnings that will be used for the calculation of RGI during the first quarter. The initial estimate should reflect the monthly earnings that are likely to be received by the household over the next three months. Extra payments, such as vacation pay, are not to be included in determining this initial estimate.

Wherever possible the Housing Provider should base the initial estimate of earnings on actual earnings. All income used in determining the initial monthly estimate must be verified. Earnings are only estimated for the first quarterly reporting period.
Quarterly Reporting Statement (QRS)
The household shall submit income information from all sources every three months. It is the household's responsibility to complete, sign and submit the QRS by the required deadline with the appropriate income verification attached.

The Housing Provider shall ensure that a QRS is completed and/or reviewed and signed by all household members with fluctuating income over the age of 16. The QRS is used to determine the average monthly income for the calculation of RGI rent. The QRS is provided in Appendix C and an electronic version can also be requested from the Housing Division.

Quarterly reporting periods will begin on the first day of the month and end on the last day of the third month. Households with fluctuating earnings must submit verification of actual income received during this period.

The QRS and verification of income are due on the first day of the month following the end of the quarterly reporting period. For example, a household will submit verification of income received between January 1 and March 31 on April 1.

If the household does not submit the QRS and income verification by the 16th of the month, the Housing Provider will notify the household that:
1. The QRS is overdue; and
2. Failure to provide the QRS by the last day of the current month may result in ineligibility for RGI assistance

If the QRS is not returned by month end, the Housing Provider will notify the household that it is ineligible for RGI assistance and is responsible for the full market rent upon 90 days’ notice. The household may request an Internal Review of a decision of ineligibility within 10 days. The decision of ineligibility may be reversed by the Housing Provider in the event that the QRS and related verification is received.

Verification of Income
Once the QRS is returned, the Housing Provider will verify the earnings that were declared. The Housing Provider is not required to re-verify or re-assess fixed income or assets at the time of the Quarterly Reporting Review. This will be done at the time of the Annual Review.

Acceptable forms of earnings verification include:
- Pay stubs; or
- A signed letter from an employer that includes:
  a. Name of employer
  b. Gross amount of each payment received for the period
  c. Dates of payments
  d. Total gross year-to-date payments received
  e. A contact name and telephone number

Averaging Earnings
Housing Providers will average the earnings declared on the QRS. In determining average earnings, the Housing Provider will:
1. Total all gross earnings and payments received during the quarterly reporting period
2. Divide by the number of weeks in the period
3. Multiply by 4.333
Recalculation of RGI (Rent)
Housing Providers will use the average monthly earnings to re-calculate RGI. Fixed income, imputed income and interest income amounts will not change. RGI changes as a result of a Quarterly Reporting Review will be implemented as follows:

- All RGI decreases will take effect on the first day of the month following the due date for the QRS
- RGI increases of $10 or more will take effect on the first day of the second month following the due date for the QRS
- RGI increases of less than $10 will not be implemented

Housing Providers will give households written notice of any RGI changes within 7 business days of making such decisions. Notice must include the household’s right to request an Internal Review of the RGI change per Housing Division Notice 2013-194 Notices and Reviews of Decisions.

The Housing Provider should also send the household a new QRS for the household to complete for the next quarterly reporting period at this time. Whenever possible, Housing Providers are to use 12 consecutive weeks of gross employment income to determine the average monthly income for households with income that fluctuates.

Other Changes
Households with fluctuating earnings will not normally have their rent re-calculated midway through the quarterly reporting period. Income is expected to fluctuate during this period and is averaged accordingly. Temporary shifts in the number of hours worked do not warrant adjustments outside of the regular Quarterly Reporting Reviews.

Where there has been a change to a fixed income source, the RGI may be re-calculated using the new fixed income amount and the existing average earnings amount. The existing average earnings are not adjusted until the end of the next quarterly period despite the change to the fixed income amount. The Housing Provider is only required to verify the change to the fixed income amount.

Adjustments can be made for tenants who have significant and permanent changes to their earnings part way through the quarterly reporting period. Significant and permanent changes may include:

- A new employment source that significantly changes the monthly average earnings
- Ending of employment
- A permanent move from part-time to full-time hours or vice versa that significantly changes the monthly average earnings

Annual Review of RGI Eligibility
Housing Providers should make all attempts to synchronize the Annual Review of RGI Eligibility with the nearest quarterly reporting change. This will avoid multiple changes within a short time frame and reduce administration.
The following table describes how Housing Providers are to calculate the average monthly employment income when households have employment income that fluctuates from month to month, depending on when the calculation is occurring.

<table>
<thead>
<tr>
<th>If average monthly employment income is being determined in the...</th>
<th>Then rent is calculated ...</th>
<th>And rent is calculated using ...</th>
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| **first month** (and for the first time before 12 consecutive weeks of gross income is available) | in the first month | income verification available at the time such as:  
• paystubs (may be only one or two weeks); or  
• a letter from the employer confirming rate of pay and estimating number of hours per week/month |
| **first year of fluctuating income with the same employer/s** | every three months | **If possible, 12 consecutive weeks of pay stubs from the previous 3 months** |
| **second year (after the first 12 consecutive months of fluctuating income)** | annually | the average monthly income from the previous 12 month period to determine rent for the next 12 months |
| **third and future years** | annually | **Notice of Assessment** from the previous year’s income tax return to determine the average gross monthly income for the next 12 months. |
APPENDIX B – Sample Letter for RGI Households with Fluctuating Income

Insert Date

Insert Address

Dear Mr/Mrs Insert Last Name:

In accordance with the City of London’s Local Rule regarding fluctuating income for households receiving rent-geared-to-income (RGI) subsidy, your average income will now be used to calculate your RGI rent every quarter rather than monthly.

Based on the information you have provided, your rent/housing charge for the next 3 months starting insert date will be $*:00.

In order to continue to be eligible to receive RGI subsidy, you are required to report your income once every three months, rather than monthly. It is your responsibility to complete, sign and submit a Quarterly Reporting Statement (QRS) by the required deadline with the appropriate income verification attached. Your next QRS is due on insert date.

After one year, provided that your income pattern and source of income remain the same, the next year’s rent will be based on the past year’s income. If you get a new job or your job changes from part-time to full-time, and/or the number of people in your household changes, you must notify us within 30 days. This may result in a change to how your rent/housing charge is calculated.

If you have any questions regarding how your new rent was calculated, please contact our office directly at insert phone number.

Should you still disagree with the way your rent is set, you have the right to request an Internal Review of this decision within 10 business days by replying in writing:

Housing Provider
Name and Address

Include, in detail, the reasons why you are requesting an Internal Review. An Internal Review will be conducted in accordance with Housing Division Notice 2013-196, Notices and Reviews of Decision which requires the Internal Review to be completed with 10 days of receiving the request by someone who did not participate in making the original decision and that a notice of decision sent within 5 days of a decision being made.

Sincerely,

Insert Provider name
Housing Division Notice 2014 – 207
Fluctuating Income Policy
Appendix C

Quarterly Reporting Statement (QRS)
Quarterly Reporting Statement (QRS)

### Name of Person with earnings:

<table>
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<tr>
<th>Employer</th>
<th>Payment Date:</th>
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**Total**

Check all other types of income that your household receives:

- [ ] None
- [ ] Support
- [ ] Employment Insurance Benefits
- [ ] ODSP
- [ ] WSIB
- [ ] Old Age Security / GIS / GAINS
- [ ] Ontario Works
- [ ] Pensions
- [ ] Other:

Has there been any change to the amount of this income?  
- [ ] No
- [ ] Yes, provide details:

Has anyone in your unit moved out?  
- [ ] Yes
- [ ] No

Has anyone new moved into your unit?  
- [ ] Yes
- [ ] No

If Yes, provide details: (NOTE that these changes should be reported to the Housing Provider within 30 days)

**ATTACH PROOF OF ALL EARNINGS YOU RECEIVED DURING THE REPORTING PERIOD. YOUR RENT CANNOT BE RECALCULATED WITHOUT THIS.**

I declare this information to be complete and accurate, and I will advise my Housing Provider of any changes.

Name of applicant/tenant/member  
Signature  
Date

Name of spouse/same-sex partner  
Signature  
Date

Names of dependant (16 years of age and older)  
Signature  
Date

Names of dependant (16 years of age and older)  
Signature  
Date

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Personal information contained on this form or in attachments is collected, pursuant to the Housing Services Act (2011) or the Municipal Freedom of Information and Protection of Privacy Act, (R.S.O. 1990, c M.56) by Housing Providers on behalf of the City of London as Servicer Manager. This information will be used to determine suitability and continued eligibility for rent-geared-to-income (RGI) housing and the appropriate rent scale and RGI rent. Personal information may be disclosed to housing providers, other municipal or provincial departments and agencies that assist in the provision of social housing and social agencies providing social assistance to the household. All household members hereby consent to the verification, disclosure and the transfer of information given on this form and attachments by or to any of the above entities. Household members are required to provide supporting income verification/documentation for the purpose of calculating RGI rent. Failure to submit this form with the required verification may result in ineligibility for RGI assistance and loss of subsidy.
Instructions and Additional Information to help you complete this form….

What is a Quarterly Reporting Statement or QRS?

The Quarterly Reporting Statement (or QRS) is completed by social housing tenants. As a social housing tenant, your rent is geared to your income. This rent-geared-to-income (or RGI) calculation is governed under Ontario provincial laws. See details below.

The QRS provides the City of London Housing Division with the information that it needs to make sure your rent is accurate, based on your income and tenants.

This information is reported quarterly (every 3 months) and averaged to determine your rent calculation.

How will completing this form change my rent?

If your income sources are fixed and do not change (e.g. if you are on a pension or government income benefit or have consistent earnings), and your family composition remains the same, then the amount of rent that you pay should also stay relatively the same.

If your income or earnings changes and fluctuates up and down or if your family composition or number of people in your household changes, then the updated QRS may result in a change to your rent?

What if I need help to fill out this form?

If you require assistance filling out this form or have any questions, please contact your Housing Provider.

My information hasn't changed but will soon...What do I do? (eg. Getting a job, someone coming or going)

It is important the your household information is current and up-to-date as this may affect your rent calculation. All known changes should be reported to your Housing Provider in a timely basis. You have 30 days to report any changes to your household and income.

Where to mail it/send it?

Your completed QRS and support documentation should be mailed or hand-delivered to your Housing Provider by the date provided on the form.

Short Legislative Reference

Subsection 50(13) of Ontario Regulation 298/01 of the Housing Services Act, the Service Manager may determine and use average monthly income in the calculation of rent-geared-to-income (RGI) assistance.
Quarterly Reporting Reviews for Staff of Housing Providers

1) In accordance with subsection 50(13) of Ontario Regulation 298/01 of the Housing Services Act, the service manager may determine and use average monthly income in the calculation of rent-geared-to-income (RGI) assistance.

2) The City of London is introducing Quarterly Reporting Reviews to standardize income averaging and to ensure that RGI calculations are performed consistently by all housing providers.

3) Quarterly Reporting Reviews are a means of both reporting income and determining a monthly average for fluctuating income. These reviews replace all current methods used by housing providers to average income.

RGI households with regular but fluctuating earnings are required to report fluctuating earnings every three months by means of a Quarterly Reporting Statement (QRS). These households may include:
   a. Employees who are paid at an hourly rate and who do not work the same number of hours from week to week
   b. Salaried employees who receive frequent bonuses or gratuities
   c. Temporary employees that work regularly with the same or different employer

4) Households with only fixed income (e.g. Old Age Security, Ontario Works/ODSP) with non-benefit income below the threshold, and seasonal employees that do not have earnings in the off season are not required to complete Quarterly Reporting Reviews.

5) Quarterly reporting periods will begin on the first day of the month and end on the last day of the third month. The QRS and verification of earnings received during this period are due on the first day of the month following the end of the quarterly reporting period.

6) Housing providers will estimate earnings for the first quarterly reporting period. Estimates will generally be based on actual verified earnings and should reflect the earnings that are likely to be received by the household over the next three months.

7) Each quarter, the housing provider will review the QRS, verify the income, re-determine the average amount of earnings and recalculate RGI as required.
   a. All payments must be verified
   b. Average earnings are determined by totaling all payments received during the quarterly reporting period, dividing by the number of weeks in the period, and multiplying by 4.333
   c. Fixed income, imputed income and interest income amounts are not adjusted

8) RGI changes as a result of a Quarterly Reporting Review are implemented as follows:
   a. All RGI decreases take effect on the first day of the month following the due date for the QRS
   b. RGI increases of $10 or more take effect on the first day of the second month following the due date for the QRS
   c. RGI increases of less than $10 are not implemented

9) Households with fluctuating earnings will not normally have their rent re-calculated midway through the quarterly reporting period unless there has been:
   a. A change to a fixed income source; or
   b. A significant and permanent change to the fluctuating earnings part way through the quarterly reporting period

10) If RGI is adjusted mid-way through the quarterly reporting period because of a change to a fixed income source, the average earnings are not adjusted.

11) In order to avoid multiple changes, housing providers will make all attempts to synchronize changes as a result of the annual review with the nearest quarterly reporting change.
Frequently Asked Questions (FAQ)

Quarterly Reporting Reviews For Staff of Housing Providers

Q. What are Quarterly Reporting Reviews?

A. Quarterly Reporting Reviews are a means of both reporting income and determining a monthly average for fluctuating income. The household declares earnings every three months, and the housing provider averages the earnings in order to re-calculate rent-geared-to-income (RGI) assistance. Quarterly Reporting Reviews replace all current methods used by housing providers to average income.

Q. Why are Quarterly Reporting Reviews being introduced?

A. Currently, housing providers average earnings in a number of different ways. This results in discrepancies in the way that RGI is calculated across the City of London and County of Middlesex. Quarterly Reporting Reviews standardize the way in which earnings are averaged making calculations more consistent.

Q. Do all households need to report income quarterly?

A. No. Only households with regular but fluctuating earnings are required to report income every three months. These households include:
- Employees who are paid at an hourly rate and who do not work the same number of hours from week to week
- Salaried employees who receive frequent bonuses or gratuities
- Temporary employees that work regularly

Q. What is the QRS and how is it completed?

A. The QRS, or Quarterly Reporting Statement, is a form that is used by the household to declare fluctuating earnings over a specified three month period - called the quarterly reporting period. The household enters the gross amounts of all payments received during this period. The QRS must be completed in full and signed by all members of the household over the age of 18 and/or 16 if they have income and are not attending school full time. Verification of all payments received during the quarterly reporting period must also be attached to the QRS when it is returned to the housing provider.

Q. Does the housing provider need to verify the earnings declared on the QRS?

A. Yes. The Housing Provider must verify all payments received during the quarterly reporting period. Earnings are normally verified by pay stubs; however, if the household does not receive pay stubs or has lost some pay stubs, they may submit a signed letter from their employer stating:
- Name of employer
- Gross amount of each payment received for the period
- Dates of payments
- Total gross year-to-date payments received
- A contact name and telephone number

Q. I have a household that has fixed income and fluctuating earnings. Do I need to verify the fixed income for the Quarterly Reporting Review?

A. No. The fixed income only needs to be verified once a year at the time of the Annual Review of RGI Eligibility. This amount will not normally be adjusted for the Quarterly Reporting Review, and does not need to be re-verified.

Q. Why is an Annual Review of RGI Eligibility still required for households that complete Quarterly Reporting Reviews?

A. Quarterly Reporting Reviews are not a full review of RGI eligibility. Their purpose is to verify fluctuating earnings and determine if the average monthly amount used in RGI calculations is accurate. At the Annual Review of RGI Eligibility, the housing provider must verify and review all household income, assets and eligibility requirements including occupancy standards. This is not normally done at the time of the Quarterly Reporting Reviews. However, housing providers are encouraged to synchronize changes as a result if the annual review with the nearest quarterly reporting change.
Q. Once the QRS is received, how are the earnings averaged?
A. In order to determine the average monthly earnings, the housing provider will:
- Total all payments declared on the QRS as having been received during the quarterly reporting period.
- Divide the total by the number of weeks in the period.
- Multiply this amount by 4.333

Q. How is RGI re-calculated during a Quarterly Reporting Review?
A. Once you have determined the average earnings, this new amount is used in the RGI calculations. During Quarterly Reporting Reviews, there is no need to review or adjust fixed income or imputed income amounts that are also used in the RGI calculation.

Q. Do I need to adjust imputed income during the Quarterly Reporting Review?
A. No. Imputed income is only reviewed and adjusted at the time of the Annual Update of RGI Eligibility.

Q. How are RGI changes implemented?
A. If the Quarterly Reporting Review results in an RGI change, the change is implemented as follows:
- All RGI decreases take effect on the first day of the month following the due date for the QRS
- RGI increases of $10 or more take effect on the first day of the second month following the due date for the QRS
- RGI increases of less than $10 are not implemented

Q. Do I need to notify the tenant?
A. You only need to notify the tenant if there has been a change to the amount of the RGI. If the average earnings have changed, but the RGI amount remains the same (e.g. there is an increase of less than $10), the tenant is not notified. However, the tenant must be issued a new QRS to complete for the following quarterly reporting period.

Q. Can the tenant request an Internal Review of the RGI change?
A. Yes. The tenant may request an Internal Review of any change in the amount of their RGI. In accordance with Housing Division Notice 2013-194 Notices and Reviews of Decisions, the notice of decision must also advise that the tenant has the right to request an Internal Review.

Q. I have a tenant that lost their job at the end of the quarterly reporting period? Do they have to wait another three months before I can adjust RGI?
A. No, you can adjust the RGI right away because this is a significant and permanent change in earnings. Although the tenant may have had full earnings in the last quarter, you should adjust the RGI to reflect current zero earnings. The decrease in RGI would take effect on the first day of the month following the last date of pay. The cessation of earnings must also be verified.

Q. I have a tenant that just started a new job. How do I start Quarterly Reporting?
A. You will need to estimate the earnings for the first quarterly reporting period and notify the tenant of the new Quarterly Reporting requirements.
- Verify the earnings. This will likely be an employer letter outlining the anticipated gross amount of pay, frequency of pay, date of first payment and contact name and telephone number
- Determine when the tenant will receive their first pay. This month will be the first month of the quarterly reporting period
- Notify the tenant that they will need to submit a QRS and their pay stubs every 3 months. Give the tenant the QRS indicating the first quarterly reporting period and when the QRS is due
- Estimate the monthly average of earnings based on the verification letter
- Increase RGI to reflect average earnings effective the first day of the second month following the first date of pay
- Follow up for the first QRS and earnings verification when it is due
Q. I have a tenant that worked more overtime than usual in the period just prior to our introducing Quarterly Reporting. His last reported earnings are almost twice what they are normally. Should I use this amount as the average earnings for the first quarterly reporting period?

A. No. The ongoing average amount of earnings should approximate the amount that the tenant is likely to receive over the next quarter. You can adjust the estimate to exclude the unusual overtime amounts.

Q. I have a tenant who works as a school bus driver but has no earnings in the summer. Should I have her complete Quarterly Reporting Reviews?

A. No. School bus drivers are seasonal workers. Their income should be averaged over the full calendar year.

Q. I have a tenant whose source of income changes from Ontario Works to Earnings to Employment Insurance quite frequently. Should he report income quarterly?

A. No. These households should not declare income quarterly. You may want them to report more frequently so that you can determine a reasonable average of their income.