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Comment Submitted by KIMBERLY ARMSTRONG

Posted by the Department of Housing and Urban Development on Jul 24, 2026

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Comment

Document Number: 2026-11891

RE: Public Comment on Proposed Information Collection Regarding Household Data and Eligibility Assessments

To Whom It May Concern,

I am submitting this comment to demand an immediate correction to how HUD collects applicant data, determines program eligibility, and instructs frontline housing staff. Currently, there is widespread systemic confusion among state compliance officers, private housing managers, and Public Housing Authorities (PHAs) regarding how to count foster youth and children in the process of adoption.

A destructive myth persists in the affordable housing industry: because a child's foster care or adoption stipend is excluded from the annual income calculation, the child themselves is excluded from the total household size. [1]

This misunderstanding directly triggers wrongful program disqualifications. Household size is the baseline metric used to find a family's correct income cap on the Area Median Income (AMI) charts. When a compliance officer refuses to count a foster-to-adopt child as a person on the intake forms simply because their stipend is non-taxable or excluded, the family is forced into a lower AMI bracket. This administrative error improperly shrinks the family's maximum allowable income tier, disqualifying stable resource and adoptive homes from getting or keeping assistance. [1, 2]

To fix this operational loophole, HUD must ensure its demographic and eligibility collection guidance mandates the following:

Explicit "Separation of Income and Person" Language: Eligibility documentation must feature a prominent,

clear directive stating: The exclusion of a household member's income or stipend does not exclude that member from the total household size count for AMI eligibility.

Universal Inclusion of Foster/Adoptive Youth: Intake materials must explicitly state that all foster youth—including those in temporary placements, pre-adoptive, or foster-to-adopt pipelines—must be fully counted as individuals in the household size calculation used to pull limits from AMI charts.

Mandatory Standardized Training and Paperwork: HUD must rewrite the standard eligibility verification forms to prevent local private and state housing managers from omitting children from the household headcount based on their legal foster status.

Data collection metrics must accurately capture the human reality of the home, not just the financial status. HUD must explicitly decouple income definitions from headcount metrics to end the wrongful exclusion of families caring for vulnerable children.

Thank you for your consideration.

Sincerely,

Kimberly Armstrong

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