



CATCH Neighborhood Housing

Modification To Tenant Selection Plan

This Modification to Tenant Selection Plan (the “Modification”), effective as of 5/31/2024, modifies the Tenant Selection Plan (the “Plan”), for all CATCH Neighborhood Housing Developments (the “Development”), dated as of 12/15/2020, as prepared by Alliance Asset Management (the “Agent”), as the management agent for CATCH Neighborhood Housing (the “Owner”), as follows:

1. Add to the Plan, as Attachment A, the “Additional List of Required and Discretionary Policies” annexed hereto. This Modification is intended to incorporate requirements of sections 102 and 104 of the Housing Opportunity through Modernization Act of 2016 (HOTMA), which includes changes to income calculation, net family assets, and income reviews. To the extent this attachment conflicts with any part of the Plan this Modification shall prevail.





Attachment
Additional Rules and Discretionary Policies – Tenant Eligibility
Sections 102 and 104 of Housing Opportunity through
Modernization Act of 2016

Pursuant to Sections 102 and 104 of the Housing Opportunity through Modernization Act of 2016, (“HOTMA”), in the determination of eligibility for tenancy, the Agent shall comply with the additional rules and policies set forth in this attachment.

Capitalized terms not otherwise defined within this attachment shall have the meaning ascribed to them in the Plan.

This change is effective May 31, 2024. However, the Owner/Agent must continue to follow the existing Plan and EIV policies & procedures until the Agent’s software is compliant with TRACS 203A.

Applicable Programs (check as applicable):

- Housing Choice Voucher (HCV);
- Section 8 Moderate Rehabilitation (Mod Rehab);
- Section 8 Moderate Rehabilitation Single Room Occupancy (SRO);
- Section 8 Project-Based Rental Assistance (PBRA);
- Section 202/8;
- Section 202/811 Capital Advance with Project Rental Assistance Contracts (202/811 PRAC);
- Section 811 Project Rental Assistance (811 PRA);
- Senior Preservation Rental Assistance Contracts (SPRAC);
- Low Income Housing Tax Credits; and
- Other:

[Note: The applicability of the additional rules and discretionary policies within this modification are subject to the program(s) selected above.]





List of Additional Rules and Policies

1. Asset Limitation

- A. New Admissions
 - B. Annual and Interim Reexaminations
 - i. Enforcement Options
 - ii. Exception Policies
-

2. Calculating Income

- A. De Minimis Error in Income Determinations

3. Deductions and Expenses

- A. Hardship Exemptions for Health/ Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses
 - B. Hardship Exemptions for Health/ Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses
 - Phased-In Relief
 - C. General Relief
 - D. Hardship Exemption to Continue Childcare Expense Hardship
-

4. Income

- A. Self-Certification of Net Family Assets Equal to or Less than \$50,000
-

5. Interim Reexaminations

- A. Interim Reexaminations – Decreases in Adjusted Income
 - B. Interim Reexaminations – Increases in Adjusted Income
 - C. Interim Reexaminations – Reporting Changes & Effective Date
-



6. Verification

- A. Revocation of Consent Form (Form HUD-9887)
- B. Enterprise Income Verification (EIV) Usage

1. Asset Limitation

Regulations: 24 CFR § 5.618

Applicable programs: **Section 8 (Project Based Rental Assistance) and Section 202/8 only.**

Per requirements in Section 104 of HOTMA, 24 CFR 5.618 creates a restriction on the eligibility of a family to receive assistance if the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$100,000, as adjusted annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers.

A. New Admissions

Required HOTMA Rule

Agent must deny admission of an applicant family for the following:

1. Net family assets that exceed \$100,000 (adjusted annually for inflation); and/or
2. The family has a present ownership interest in, a legal right to reside in, and the effective legal authority to sell the real property (based on laws of the state or locality in which the property is located) that is suitable for occupancy by the family as a residence.

In addition, the Agent must enforce the asset limitation at initial certification for families who lost their assistance because they failed to recertify timely or began to pay market rent, remained in the unit, and then lost income, once again requiring assistance.

Agent's Discretionary Policy

No discretion.

B. Annual and Interim Reexaminations

(i) Enforcement Options



Required HOTMA Rule

Agent has discretion at annual and interim reexamination in enforcing the asset limitation on eligibility for assistance.

Agent's Discretionary Policy

Agent has selected the following enforcement option at annual and interim reexaminations (*check as applicable*):

Total Enforcement - Agent has elected to fully enforce the asset limitation as written in the statute (i.e., the real property requirement and the \$100,000 net family assets requirement). Agent must initiate termination of assistance proceedings within six months of the income examination that determined the family was out of compliance.

Total Non-Enforcement - Agent has elected not to enforce the asset limitation for all families at annual and interim reexamination. This means that the Agent will not initiate termination of assistance proceedings for a family for non-compliance with the asset limitation. Agent is still required to calculate net family assets in the manner required by § 5.603, as part of the process of calculating annual income in accordance with § 5.609.

Limited Enforcement: Option to Cure – Agent has established a written policy to not enforce the asset limitation for all families, for up to six months after the effective date of a family's annual or interim reexamination. Families are given the opportunity to cure noncompliance with the asset limitation during this period. *If checked, include policy below.*

Regardless of the policy adopted above, Agent must comply with federal fair housing and civil rights requirements, including reasonable accommodation requirements.

(ii) Exception Policies

Required HOTMA Rule

The Agent may establish exceptions to the asset limitation during reexamination so that families in specified exception categories will receive either total non-enforcement or limited enforcement, depending on the exception policy adopted. Families in the specified exception categories would either (a) not be subject to termination of assistance proceedings due to non-compliance with the asset limitation at a reexamination, or (b) they would be provided an opportunity, up to but no longer than six months, to come back into compliance, after which point the asset limitation would be enforced. An exception policy may be combined with a limited enforcement policy for all other families not in the exception categories, as described below.



Agent’s Discretionary Policy

The Agent has chosen total non-enforcement of asset limitation at annual and interim reexamination.

2. Calculating Income

A. De Minimis Errors in Income Determinations

Regulations: 24 CFR § 5.609(c)(4); 5.657(f); 891.105; 891.410(g); and 891.610(g)

Required HOTMA Rule

Pursuant to 24 CFR §5.609(c)(4), the Agent must take corrective action to credit or repay a family if the family was overcharged tenant rent because of de minimis errors in calculating family income. De minimis errors occur when an Agent’s determination of a family’s income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (or \$360 in annual adjusted income). HUD may revise the threshold amount that constitutes a “de minimis error” through rulemaking.

Families will not be required to repay the Agent in instances where the Agent miscalculated income resulting in a family being undercharged for rent. The Agent is obligated to correct the error(s) retroactive to the effective date of the action the error was made regardless of the dollar amount associated with the error.

Agent’s Discretionary Policy – Refund or Credit for Tenant Overcharge

Overcharged tenant rent will be *(check as applicable)*:

- Refunded to the tenant
- Credited to the tenant
- Allow tenant to decide whether they want a refund or a credit

Once the Agent becomes aware of the existence of an income calculation error, the error(s) will be corrected retroactive to the effective date of the action resulting in an error regardless of the dollar amount associated with the error.

Families will not be required to repay the Agent in instances where the Agent miscalculated income resulting in a family being undercharged for rent. Once the Agent becomes aware of the error the family will be provided with a 30-day notice of the increase to their rent portion.





The Agent will take corrective action to credit a family if the family was overcharged tenant rent, including di minimis errors, in the income determination.

3. Deductions and Expenses

A. Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses

Regulations: 24 CFR § 5.611(c)(2)

Required HOTMA Rule

The Agent must provide hardship relief to a family that demonstrates its eligible unreimbursed health and medical care expenses, or reasonable attendant care and auxiliary apparatus expenses exceed 5 percent of the family's annual income. To meet the requirements for the health and medical care expense hardship exemption, the family must have expenses that meet the definition of health and medical care expenses as provided by 24 CFR 5.603(b). To meet the requirements for the reasonable attendant care and auxiliary apparatus expenses hardship exemption, the family must have expenses that meet the definition of reasonable attendant care and auxiliary apparatus expenses at 24 CFR 5.603(b).

Families may be eligible for relief under one of two categories; phased-in relief or general relief. A family receiving phased-in relief may request to receive general relief instead; once a family chooses to obtain general relief, a family may no longer receive the phased-in relief and their expense threshold will increase to 10% once general relief ends.

B. Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – Phased-In Relief

Regulations: 24 CFR § 5.611(c)(1)

Required HOTMA Rule

Families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first on or after the date the Agent implements the phased-in relief.

Families who receive phased-in relief will have eligible expenses deducted that exceed 5 percent of annual income for 12 months. Twelve months after the 5 percent phase-in began, families will have eligible expenses deducted that exceed 7.5 percent of annual income for the immediately following 12 months. After the family has completed the 24





months phase-in at the lower thresholds, as described above, the family will remain at the 10 percent threshold, unless the family qualifies for relief under the general hardship relief provision.

Agent's Discretionary Policy

Agent will not phase-in relief for a new admission who was receiving the phased-in relief at their prior assisted housing.

C. General Relief

Required HOTMA Rule

To receive general relief, a family must demonstrate that the family's unreimbursed health and medical care expenses or unreimbursed reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination.

Relief is available regardless of whether the family previously received an unreimbursed health and medical care expense deduction, unreimbursed reasonable attendant care and auxiliary apparatus expense deduction, are currently receiving phased-in hardship relief, or were previously eligible for either this general relief or the phased-in relief.

If the Agent determines that a family is eligible for general relief, the family will receive a deduction for the sum of the eligible expenses that exceed 5 percent of annual income. The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever comes earlier.

The Agent must promptly notify families in writing of the change in the determination of adjusted income and the family's rent resulting from the application of the hardship exemption. The written notice must also inform the family of the dates that the hardship exemption will begin and expire and the requirement for the family to report to the Agent if the circumstances that made the family eligible for relief are no longer applicable. The notice must also state that the family's adjusted income and tenant rent will be recalculated upon expiration of the hardship exemption. The Agent must provide families 30 days' notice of any increase in rent.

The Agent must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. The notification must specifically state the reason for the denial. In addition, the Agent must notify the family if the hardship exemption is no longer necessary and will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.

Agent's Discretionary Policy

What constitutes a hardship, which includes the family's inability to pay rent, for the purposes of the general hardship exemption is as follows:

- Total rent, utility payment, childcare expenses or health and medical expenses is more than 45 percent of the family's adjusted income.
- The family has experienced unanticipated expenses, such as large medical bills, that have affected their ability to pay their rent.
- The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits.
- The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster.
- Other: Agent has not established any additional hardship criteria.

It is the policy of Agent to offer general hardship relief for the regular health and medical expenses deduction and the child care deduction. Hardship includes the following situations:

Child care:

- A death has occurred in the family. In order to qualify under this provision, a family must describe how the death has created a need for child care
- A health/ medical issue in the family which has created the need for child care. In order to qualify under this provision, a family must describe how the health or medical issues have created a need for child care.

A family is considered to have a hardship when:

- The household's family share of total housing costs exceeds 35 percent of adjusted household income.
- Or when the family would be evicted because it is unable to pay the tenant portion of the rent. Family health and medical expenses
- A change in circumstances includes the need for new, qualifying, health / medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income.



- For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost.
- For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.
- The family may receive a deduction of all eligible expenses exceeding 5% of their annual income.
- The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier.

The Agent will grant a one-time 90 day extension, if the circumstance still exist after first exemption has been granted.

D. Hardship Exemption to Continue Child Care Expense Hardship

Regulation: 24 CFR § 5.611(d)

Required HOTMA Rule

Reasonable child-care expenses are expenses for the care of children (including foster children if the unreimbursed child-care expenses are paid from the family's annual income and not from another source, such as stipend from the child welfare agency), under 13 years of age, when all the following statements are true:

- The care is necessary to enable a family member to be employed or to further his or her education (e.g., work, look for work, or further their education (academic or vocational)); and
- The expense is not reimbursed by an agency or individual outside the household; and
- The amount deducted must not exceed the amount of employment income that is included in annual income.

A family whose eligibility for the child-care expense deduction is ending may receive a hardship exemption to continue receiving a child-care expense deduction in certain circumstances when the family no longer has a member that is working, looking for work, or seeking to further their education, and the deduction is necessary because the family is unable to pay their rent.

When a family requests a hardship exemption to continue receiving a child-care expense deduction that is ending and satisfies the conditions for hardship as defined in the Agent's policy below, the Agent must recalculate the family's adjusted income and continue the





child-care deduction if the family demonstrates to the Agent's satisfaction that the family is unable to pay their rent because of loss of the child-care expense deduction and the child-care expense is still necessary even though the family member is no longer working, looking for work, or furthering their education. The hardship exemption and the resulting alternative adjusted income calculation must remain in place for a period of up to 90 days. The Agent, at their discretion, may extend such hardship exemptions for additional 90-day periods based on family circumstances.

The Agent must promptly notify families in writing of the change in the determination of adjusted income and the family's rent resulting from the application of the hardship exemption. The written notice must also inform the family of the dates that the hardship exemption will begin and expire and the requirement for the family to report to the Agent if the circumstances that made the family eligible for relief are no longer applicable. The notice must also state that the family's adjusted income and tenant rent will be recalculated upon expiration of the hardship exemption. The Agent must provide families 30 days' notice of any increase in rent.

The Agent must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. The notification must specifically state the reason for the denial. In addition, the Agent must notify the family if the hardship exemption is no longer necessary and will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.

Agent's Policy – Hardship Exemption to Continue Childcare Expense

In evaluating requests for a hardship exemption, it is the Agent's policy that any one or more of the following shall constitute a hardship:

- Gross rent, utility payment, childcare expenses or health and medical expenses is more than 45 percent of the family's adjusted income.
- The family has experienced unanticipated expenses, such as large medical bills, that have affected their ability to pay their rent.
- The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster.
- Inability to pay rent.

Agent's Discretionary Policy

It is the policy of the AGENT to extend the child care expense deduction for additional 90-day periods if the family demonstrates that they are unable to pay their rent because of loss of the child care expense deduction, and the child care expense is still necessary





even though the family member is no longer employed, looking for work, or furthering his or her education.

- THE AGENT may extend the hardship exemption for additional 90-day periods based on family circumstances
- THE AGENT may terminate the hardship exemption if it is determined that the family no longer needs the exemption
- The child care deduction may continue to be necessary when the family has a hardship so that they continue to need child care.

4. Income

A. Self-Certification of Net Family Assets Equal to or Less Than \$50,000 (adjusted annually for inflation): Applicable to the 202 Program; all others must follow LIHTC and HOME rules regarding Assets.

Regulations: 24 CFR §§ 5.603; 5.609; 5.618; 5.659; 891.105; and 891.415(a)(2)

Required HOTMA Rule

The Agent must determine Net Family Assets and income from Net Family Assets at admission and at reexamination.

1. For purposes of determining net family assets, the Agent may (but is not required to) adopt a policy to allow for self-certification of net family assets for families with net family assets that are equal to or below \$50,000, adjusted annually for inflation.
2. If the Agent elects to accept self-certification of net family assets at admission and at reexamination, the Agent must fully verify (i.e. by third-party verification) the family's assets every three years.
3. Agents who choose not to accept self-certifications of assets must fully verify (i.e. by third-party verification) net family assets on an annual basis.
4. Third-party verification of assets is required when net family assets exceed \$50,000, adjusted annually by HUD.

Agent's Discretionary Policy

The Agent will accept a family's self-certification of net family assets equal to or less than \$50,000 upon admission and re-examination. The Agent will fully verify by third-party verification the family's assets every three years.

5. Interim Reexaminations





A. Interim Reexaminations - Decreases in Adjusted Income

Regulations: 24 CFR §§ 5.657(c)(2); 891.105; 891.410(g); and 891.610(g)

Required HOTMA Rule

Applicable programs: **Section 8 (Project Based Rental Assistance), Section 202/8, Section 202/811 PRAC, Section 811 PRA, SPRAC**

A family may request an interim determination of family income for any change since the last determination. However, the Agent may decline to conduct an interim reexamination of family income if the Agent estimates that the family's adjusted income will decrease by an amount that is less than 10 percent of the family's annual adjusted income.

The Agent must conduct an interim reexamination of family income when the Agent becomes aware that a family's annual adjusted income has changed by an amount that the Agent estimates will result in a decrease of 10 percent or more in annual adjusted income or a lower threshold set by HUD or by an Agent. In addition to decreases in family income, increases in deductions may produce a sufficient decrease in adjusted income to support an interim reexamination.

The Agent is required by HUD to process interim reexaminations for all decreases in adjusted income as a result of a decrease in family size attributed to the death or permanent move-out of a household member from the assisted unit.

Agent's Discretionary Policy

An interim reexamination will be conducted when the Agent becomes aware that the family's adjusted income has changed by an amount that is estimated to result in a decrease of at least 10% of the family's annual adjusted income.

B. Interim Reexaminations - Increases in Adjusted Income

Regulations: 24 CFR §§ 5.657(c)(3); 891.105; 891.410(g)(2); and 891.610(g)(2)

Required HOTMA Rule

The Agent must conduct an interim reexamination of family income when the Agent becomes aware that the family's adjusted income has changed by an amount that the Agent estimates will result in an increase of 10 percent or more in annual adjusted income or another amount established through a HUD notice, with the following exceptions:



- The Agent may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle; and
- The Agent may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

The Agent must not process interim reexaminations for income increases that result in less than a 10-percent increase in annual adjusted income. When the family previously received an interim reexamination for a decrease to annual adjusted income during the same annual cycle, an Agent has the discretion to consider or ignore a subsequent increase in earned income for the purposes of conducting an interim reexamination. If an Agent has a policy of considering increases in earned income after an interim conducted for a decrease in income, and the family's adjusted income has increased by 10 percent or more, the Agent must conduct an interim reexamination in accordance with local policies.

Conversely, the Agent that adopt local policies to never consider increases in earned income must not perform an interim reexamination.

A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point the Agent must conduct an interim reexamination. When an increase of any size is reported by a family, it is a recommended best practice for the Agent to note the reported increase in the tenant file.

The Agent must conduct an interim reexamination of family income when they become aware that the family's annual adjusted income has changed by an amount that would result in an estimated increase of ten percent or more in annual adjusted income or another amount established through a HUD notice, except the Agent may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle. The Agent may not establish a different threshold to conduct interim reexaminations for increases in adjusted income.

Agent's Discretionary Policy

The Agent will not consider any increases in **earned income** when estimating or calculating whether the family's adjusted income has increased, regardless of whether the family had an interim decrease in income since the last annual reexamination.

All families are required to report any changes in family income that will result in an increase of 10% or more in annual adjusted income, with the exception that families are not required to report any increase in income during the last 3 months before their regular annual examination.



No interim reexaminations will be conducted due to **increases** in annual adjusted income in the 3 months before the next regular annual examination.

C. Interim Reexaminations - Reporting Changes & Effective Date

Regulations: 24 CFR §§ 5.657(c)(4); 891.410(g)(2); and 891.610(g)(2)

Required HOTMA Rule

Families must report household composition changes and changes to adjusted income consistent with HOTMA's requirements; however, the Agent shall establish a policy to determine the timeframe in which reporting must occur to be considered "timely."

The Agent may adopt a policy to apply rent decreases retroactively for circumstances in which families fail to report changes in a timely manner. A retroactive rent decrease may not be applied prior to the later of either the first of the month following the date of the actual decrease in income, or the first of the month following the most recent previous income examination. The Agent may establish additional criteria to describe the conditions under which retroactive decreases will be applied (e.g., the kinds of extenuating circumstances that may inhibit timely reporting).

Agent's Policy - Reporting Conditions - Changes in Household Composition/Adjusted Income

It is the Agent's policy that families must report changes in household composition and adjusted income consistent with HUD's requirements for processing an interim reexamination or other non-interim reexamination transaction in the manner specified below.

Agent's Discretionary Policy

Families must report all changes in family income or composition within 30 calendar days from the effective date of the change to be considered "timely."

- Timely reporting related to an increase in rent: When a family reports a change in family income or composition that will result in an increase in tenant rent, the family must be provided a minimum of 30 calendar days' notice of the rent increase. The rent increase will be effective on the first of the month following the end of the 30-day notice.
- Timely reporting related to a decrease in rent: Families that report changes in family income or composition within 15 calendar days from the effective date of the change that results in a decrease in tenant rent, the decrease will be effective the first day of the month after the date of the actual change leading to the interim reexamination of family



6. Verification

A. Revocation of Consent Form (Form HUD-9887)

Regulations: 24 CFR §§ 5.230(c)(5)(iii); 24 CFR 5.232(c); 891.105; 891.410(g)(3)(ii); and 891.610(g)(3)(ii)

Required HOTMA Rule

On or after January 1, 2024, after all applicants and participants have signed and submitted a consent form (Form HUD-9887), family members do not need to sign and submit subsequent consent forms except new family members aged 18 or older, existing family members turns 18 or as directed by HUD or the PHA in administrative instructions.

The executed consent form will remain effective until the family is denied assistance, the assistance is terminated, or the family (or a family member) provides written notification to the Agent to revoke consent.

Families (or family members) have the right to revoke consent by notice to the Agent. Unless the Agent has established a policy below such that revocation of consent will result in termination of assistance (except for PRAC-assisted units where it can result in termination of tenancy), participant families will be required to sign a new consent form by the next regularly scheduled reexamination or interim reexamination, whichever occurs first.

The Agent must notify their local HUD office when an applicant or participant family member revokes their consent.

Agent's Discretionary Policy – Consent Form Revocation

The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the PHA to revoke consent.

Families have the right to revoke consent by notice to the Agent, however, revoking consent will result in termination or denial of assistance. Those who are in PRAC-assisted units the result is termination of tenancy.



B. Enterprise Income Verification (EIV) Usage

Regulations: 24 CFR § 5.233

Required HOTMA Rule

The Agent must update their EIV policies and procedures to reflect their discretionary use of EIV reports (e.g., Income Report, zero income reports, New Hires Report, etc.) under HOTMA. ***Effective date of change is 5/31/2024***

Agent's Discretionary Policy – EIV During reexamination

The Agent will not use the EIV system during interim reexaminations.

