



The Connecticut Individual Development Account Initiative and Housing Trust Fund

Technical Policy Manual



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**DEPARTMENT OF LABOR
INDIVIDUAL DEVELOPMENT ACCOUNT PROGRAM
TECHNICAL POLICY MANUAL**

Date: 08-01-2012	12-01	Section: 1010
Topic: Introduction		

Introduction

This technical policy manual provides guidance to the Individual Development Account (IDA) program operators awarded grants by the Connecticut Department of Labor (DOL). It was developed by the DOL and the Clearinghouse liaison in response to technical questions generated from program operation and the answers to those questions.

This manual supplements, but does not replace, the Connecticut Individual Development Account Initiative Policies and Procedures Manual. However, due to the evolving nature of the IDA program, the need for additional policies or modifications to existing policies will occur. As these additions or modifications occur, this manual will be revised. This manual contains the most recent guidance on IDA policies.

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Topic: Mission, Goals, Objectives		

Mission

The Connecticut IDA Initiative intends to strengthen families and communities by facilitating self-sufficiency and economic stability through financial education and asset development.

Goals

1. To invest in communities by providing opportunities for community-based organizations to offer financial education and matched savings accounts as asset development tools for low-income and moderate-income families.
2. To invest in low-income and moderate-income families by providing grants for community-based organizations to prepare and assist families to purchase and maintain assets through six qualified purchases: Education or job training; Home ownership; Small business capitalization; Lease deposit on a primary residence; Vehicle purchase to obtain or maintain employment; Education or job training for a dependent child.

Objectives

1. To provide Individual Development Account opportunities for the purposes of:
 - a. Increasing home ownership opportunities for low- and moderate-income families.
 - b. Increasing access to post-secondary education and career training for low- and moderate-income families.
 - c. Developing micro-enterprise ownership opportunities for low- and moderate-income families.
 - d. Improving access to rental opportunities for low- and moderate-income families.
 - e. Supporting employment transportation for low- and moderate-income families.
2. To facilitate financial education opportunities that will provide participants with the knowledge necessary to build their assets and use these assets in the most effective way.
3. To develop life-long savings habits among participant families.
4. To encourage decision-making and long-range planning among participant families.
5. To familiarize IDA participants with financial institutions and increase their comfort level in doing business with those institutions.

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Topic: Authority and Purpose		

Authority and Purpose

Pursuant to State of Connecticut Public Act No. 00-192, DOL shall serve as the state administrator of the Connecticut Individual Development Account Initiative (“Connecticut IDA Initiative”). The purpose of the Connecticut IDA Initiative is to provide eligible individuals with opportunities to establish individual development accounts for matched earned income savings, through “Certified State IDA Programs.” The Connecticut IDA Initiative is subject to applicable Federal, State or local government laws and regulations concerning the establishment, administration and delivery of IDA programs; including but not necessarily limited to banking practices and standards.

DOL implemented the Connecticut IDA Initiative through adoption of IDA regulations and competitive procurement of Certified State IDA Programs for local areas. DOL established and administers a non-lapsing, Central Individual Development Account Reserve Fund (IDA Reserve Fund) for the Initiative; and an IDA Clearinghouse for information on Certified State IDA Program funding, establishment, local administration and delivery, and best practices. DOL performs oversight, monitoring, and evaluation functions as the state administrator of the Connecticut IDA Initiatives.

Individuals eligible to participate in state-funded Certified IDA Programs are members of a household located in Connecticut, have earned income, and whose adjusted gross income does not exceed 80% of the Area Median Income as derived for Connecticut towns by DOL per USDHUD Area Median Income figures and formulas. The earned income requirement does not apply to Qualified Disabled Individuals. Program operators must make every good effort to ensure that at least 30% of the IDA accountholders in any state-funded Certified IDA Program have earned income at or below 200% of the Federal Poverty Level.

Eligible bidders for Certified State IDA Programs are community-based organizations (CBOs), i.e. organizations exempt from taxation pursuant to Sec. 501(c)(3) of the Internal Revenue Code of 1986 or any subsequent corresponding IRS code of the U.S as amended. DOL has the discretion to adopt additional eligibility criteria for Certified State IDA program bidders/providers through IDA regulations.

DOL adopted regulations for the Connecticut IDA Initiative in concert with the Office of the Treasurer (OTT). DOL releases Request for Proposals (RFP) to solicit, review, accept, or reject proposals from community-based organizations seeking to operate “Certified” State IDA programs on a not-for-profit basis. The regulations adopted by DOL contain the processes and requirements for: the competitive procurement

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process; the establishment of IDA reserve funds; the establishment of the IDA Clearinghouse; the criteria for “certification” of IDA Programs; and other aspects of the Connecticut IDA Initiative, pursuant to CT PA 00-192 Section 9.

Amounts appropriated by the State for the Connecticut IDA Initiative will be deposited in the Central IDA Reserve Fund administered by DOL. The Central IDA Reserve Fund will hold grants, donations, contributions, and other sources of revenue received for the IDA Initiative.

DOL uses amounts from the Central IDA Reserve Fund for the following: to provide grants to CBOs to operate Certified State IDA Programs; to assist organizations to provide training, counseling, and case management for program participants; and for program administration purposes at the state and local levels. DOL will provide grant funds for the preceding purposes from the DOL Central IDA Reserve Fund for deposit into local reserve funds established and managed by the CBOs that are awarded grants by DOL to provide local Certified IDA Program services. CBOs will establish and maintain local reserve funds, trust or custodial accounts for participants’ IDAs, and parallel accounts for individual matching contributions through partnering agreements with insured financial institutions.

Certified State IDA Programs provide IDA services that include but are not necessarily limited to the following: outreach; uniform application procedures and approved Savings Plan development; case management and financial counseling; financial education training; training and counseling specific to the approved expenses for which IDA participants are saving; crisis intervention services to prevent premature or emergency withdrawals of IDA savings; and follow-up after approved expense purchase.

DOL monitors and evaluates Certified State IDA Programs established through DOL contracts to ensure ongoing compliance, to track performance, and to measure the extent to which asset-based policy affects civic, social, and economic improvement and stability for families and communities.

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Topic: Definitions		

Definitions

Account Holder means a participant in a certified state IDA program.

Adjusted Gross Income (AGI) means the adjusted gross income of a natural person with respect to any taxable year, as determined for federal income tax purposes and as properly reported on such person's federal income tax return.

Approved Plan means a plan (Savings Plan Agreement) prepared jointly by the account holder and the community-based organization that defines savings goals, program requirements and permissible uses of the individual development account and its matching funds pursuant to sections 31-51xx to 31-51aaa, inclusive, and regulations adopted pursuant to section 31-51ddd. The approved plan shall be a contract between the account holder and the community-based organization.

Area Median Income (AMI) means area median household income as determined from time to time by the United States Department of Housing and Urban Development.

Certified State IDA Program means a program of matched savings accounts that has been certified by the department in accordance with regulations adopted pursuant to section 31-51ddd.

Clearinghouse means a service to provide organizations interested in establishing, or which have established, individual development account programs with literature on federal, state and other sources of funding, guidelines for best practices and program standards, and information regarding the establishment and maintenance of certified state IDA programs.

Community-Based Organization means an organization exempt from taxation pursuant to section 501(c)(3) of the Internal Revenue Code of 1986 or any subsequent corresponding internal revenue code of the United States, as from time to time amended, which meets the requirements set forth in regulations pursuant to section 31-51ddd.

Department means the Connecticut Labor Department.

Dependent Child means the account holder's natural child, adopted child, stepchild, or legal ward who, at the commencement of the account holder's participation in a certified state IDA program is: (a) under twenty-one (21) years of age and wholly or mainly

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Definitions continued

supported by the account holder; or (b) mentally or physically impaired and, because of such impairment, wholly or mainly supported by the account holder.

Earned Income means any compensation payable by an employer to an employee, including but not limited to wages, salaries, commissions, bonuses, and tips, earnings from self-employment or contractual agreements, and Earned Income Tax Credit refunds.

Education means (A) a post-secondary program of instruction provided by a college, university, community college, area vocational-technical school, professional institution or specialized college or school legally authorized to grant degrees, or (B) any related educational program approved by the community-based organization and the department.

Vocational-technical education - The Perkins Act defines vocational-technical education as organized educational programs offering sequences of courses directly related to preparing individuals for paid or unpaid employment in current or emerging occupations requiring other than a baccalaureate or advanced degree. Programs include competency-based applied learning which contributes to an individual's academic knowledge, higher-order reasoning, problem solving skills, and the occupational-specific skills necessary for economic independence as a productive and contributing member of society. For more information on the Carl D. Perkins Act, go to:
<http://www2.ed.gov/offices/OVAE/CTE/perkins.html>

Emergency Withdrawal means a withdrawal, by an account holder from those funds deposited by the account holder in his/her individual development account, due to a personal crisis, including but not limited to, illness, eviction, potential foreclosure, or job loss.

Entrepreneurial Activity means the purchase of or investment in a small business, as defined in subsection (a) of section 4-168a, in Connecticut in which, upon such purchase or investment, the account holder will be a principal.

Small Business ((a) of section 4-168a) - means a business entity, including its affiliates, that (A) is independently owned and operated and (B) employs fewer than seventy-five full-time employees or has gross annual sales of less than five

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million dollars, provided that an agency, in adopting regulations in accordance with the provisions of this chapter, may define small business to include a greater number of full-time employees, not to exceed applicable federal standards or five hundred, whichever is less, if necessary to meet the needs and address specific problems of small businesses.

Federal Poverty Level (FPL) means the most recent poverty income guidelines published by the United States Department of Health and Human Services.

Financial Institution means a financial institution, as defined in section 36a-330:

Financial Institution (36a-330) - means a bank, Connecticut credit union, federal credit union or an out-of-state bank that maintains in this state a branch as defined in section 36a-410;

Branch (36a-410) - means a domestic branch as defined in 12 USC Section 1813, as from time to time amended, except that branch includes any branch bank, branch office, branch agency, additional office, or any branch place of business at which fiduciary or trust powers are exercised.

Household means all individuals who share use of a dwelling unit as primary quarters for living and eating separate from other individuals. (Federal Assets for Independence Act, P.L. 105-23)

Individual Development Account (IDA) means a savings account, maintained in a program that is established pursuant to section 31-51xx that is held in a financial institution, for the sole purpose of holding the funds of the account holder for one of the purposes described in subsection (a) of section 31-51xx.

Individual Development Account Reserve Fund means a non-lapsing fund administered by the department for the purposes of providing matching funds for individual development accounts in certified state IDA programs, and for funding costs incurred by community-based organizations in the operation and administration of such programs and the department's administrative costs for the Connecticut IDA Initiative.

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Topic: Definitions		

Definitions continued

Job Training means a program for job entrance or skill development approved by the community-based organization and the department.

Qualified Disabled Individual means a disabled individual eligible for assistance to the disabled pursuant to chapter 319mm.

Persons With Disabilities (Chapter 319mm) shall mean persons having disabilities which (1) are attributable to a mental or physical impairment or a combination of mental and physical impairments; (2) are likely to continue indefinitely; (3) result in functional limitations in one or more of the following areas of major life

activity: Self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living or economic self-sufficiency; and (4) reflect the person's need for a combination and sequence of special, interdisciplinary or generic care, treatment or other services which are of lifelong or extended duration and individually planned and coordinated. (Sec. 17b-608)

Qualified Disabled Individual means:

- The individual is receiving Supplemental Security Income or Social Security Disability; or
- The individual is receiving Medicaid on the basis of a disability; or
- The individual is participating in rehabilitation services under Chapter 319mm of the Connecticut General Statutes; or
- The individual provides confirmation by the Bureau of Rehabilitative Services that such individual is eligible for assistance pursuant to Chapter 319mm of the Connecticut General Statutes; or
- The individual provides confirmation by any other agency deemed comparable by DOL of the individual's disability.

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Section: 1110

Topic: SSI, SSDI, and PASS Plans

Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI)

Supplemental Security Income (SSI) is a Federal needs-based program administered by the Social Security Administration (SSA). It pays a cash benefit to individuals who are aged, blind, or have disabilities and who have limited income and assets.

Social Security Disability Insurance (SSDI) is a federally-funded benefits program that provides aid to people who are unable to achieve gainful employment due to a permanent disabling condition.

Plan for Achieving Self-Support (PASS)

A Plan for Achieving Self-Support or PASS plan is a work incentive for people on SSI. Including a non-federal IDA (such as those provided under a CT IDA Program) into a PASS plan is currently the only way a person receiving SSI can participate in an IDA without reaching the asset limits.

Since issues of SSI/SSDI and asset limits are complicated and can change, be sure to contact the Connect to Work Benefits Specialist (800-773-4636) and/or the Social Security Administration in your area for assistance to avoid conflicts that could adversely impact an individual's benefits.

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Date: 08-01-2012	12-01	Section: 1205
Topic: Using IDA Funds to Reconstruct a Home		

Using IDA Funds to Reconstruct a Home

An account holder may use his/her IDA for the costs of acquiring, constructing or reconstructing a residence (not for renovation of an existing home). Reconstruction refers to very serious repairs on the house and not refurbishment or renovations of any kind. The law is interpreted to mean that participants may use their IDA savings and match to do any fix-up that is needed to make a participant's newly-purchased home livable, (e.g. new roof, new windows, new carpeting, new water heater, new furnace, etc.) not to purchase furnishings or appliances. The reconstruction would have to happen after the closing, since we do not want to encourage anyone to fix up a house they do not own. Reconstruction must be done in the context of the purchase of a new home; that is, a payment to make the home livable at (or near) the time of purchase. A good rule of thumb is that if the building inspection raises an issue concerning a repair that needs to be done, then that would be allowed under the definition of "reconstruction." IDA program operators are required to discuss a participant's request to use IDA savings and matching funds for reconstruction with DOL before approving funds to be used in this way. DOL always recommends spending IDA funds on costs that are clearly allowable, such as down payment or closing costs.

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Date: 08-01-2012	12-01	Section: 1210
Topic: Mobile (Manufactured) Homes		

Mobile (Manufactured) Homes

The following items need to be taken into consideration if an IDA participant wants to purchase a manufactured home:

- A manufactured home must be well-built and installed on a proper foundation.
- The financing must be fair and affordable (mobile home financing can sometimes be predatory and is often subprime).
- Homeowners must own the land underneath the home.

Grantees must use good judgment when counseling project participants. It is anticipated that grantees will help their participants make wise investment choices – for example, to purchase a home that is in good shape, that will serve their needs, and that is likely to appreciate in value. Asset counseling needs to compare a new mobile home purchase with a comparable home, showing appreciation vs. depreciation over time. DOL strongly discourages grantees from counseling their participants to purchase a low-quality home, whether it is “manufactured” or other. Many lenders will NOT finance a used mobile home or a home in a park. DOL prohibits the purchase of a home that is not permanently affixed to land that the participant owns.

For IDA programs in rural areas, most IDA homebuyers will be eligible for USDA Rural Development (RD) subsidized mortgages. However, RD will only finance new mobile homes permanently affixed to owned land. Mobile home financing can sometimes be predatory and is often subprime, so asset counselors also need to talk with buyers about what predatory lending is, what to look for, and what to avoid. IDA participants should be strongly encouraged to opt for a stick built or modular home.

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Date: 08-01-2012	12-01	Section: 1215
Topic: IRS Ruling on IDA Homebuyer Assistance Programs		

The IRS Ruling 2006-27 on IDA Homebuyer Assistance Programs

First, the ruling finds that most traditional IDA homebuyer assistance programs (as well as certain builders and developers of low-income housing also offering down payment assistance) qualify as 501(c)(3) tax-exempt. Second, the ruling holds that organizations merely passing through seller-financed purchase assistance to buyers do not qualify as 501(c)(3) tax-exempt. Finally, the ruling also finds that traditional IDA down payment assistance funds qualify as gifts under IRC section 102 and as cost basis in the home under section 1012. The IRS ruling: <http://www.irs.gov/pub/irs-drop/rr-06-27.pdf>

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Date: 08-01-2012

12-01

Section: 1220

Topic: Home Asset Purchase with a Person Who is Not an IDA Participant

Home Asset Purchase with a Person who is Not an IDA Participant

An IDA participant may request to purchase a home with a non-IDA participant as the co-owner. This is allowable; however, the sustainability of the purchase for the IDA participant is the primary concern for the integrity of the IDA program. Therefore, the following procedure must be followed:

- Ensure that the non-IDA participant attends financial education classes and asset-specific classes with the IDA participant.
- Inform the bank/mortgage company and attorney that the individuals are not related family members to ensure that the correct mortgage instrument is used.
- Ensure that the IDA participant is listed on both the mortgage and the deed.
- Ensure that the IDA participant has enough income to carry the whole mortgage in the event that the non-IDA participant is no longer providing his/her share of the mortgage payment. Call the DOL technical assistance provider for assistance with this and other unusual circumstances.

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Date: 08-01-2012	12-01	Section: 1725
Topic: Education - Computer Purchase		

Computer Purchase

Grantees may allow participants to purchase supplies and equipment required by a school, however, the IDA funds can only be used for expenses paid directly to an eligible educational institution.

If the school sells computers or can special order computers through its campus bookstore, then your participant could use his/her IDA savings to make that purchase. If the school's bookstore does not sell computers, research whether some other department in the school sells computers or works through a computer vendor (or other supplier). If the school has a special vendor agreement to buy its own equipment, perhaps it will allow the student to order a computer through that agreement. If none of these options are available, there may be other eligible educational institutions in the area that do sell computers. If so, explore whether the participant could purchase the equipment from that school.

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Date: 08-01-2012	12-01	Section: 1730
Topic: Education - 529 Plans		

529 Plans

A 529 Plan is a tax-advantaged investment plan designed to encourage saving for the future higher education expenses of a designated beneficiary (in this case, the dependent child of an IDA account holder). The Plans are named after Section 529 of the Internal Revenue Code and are administered by state agencies and organizations.

529s were designed to help families contribute funds for future college costs by offering special tax benefits to Plan participants. Any earnings are federally tax deferred and if used for qualified expenses are free of federal and state income tax.

Most states offer 529 Plans and many allow people from other states to invest in their plan. The following website www.collegesavings.org, provides each state's 529 plan by features (such as state tax benefits, fees, etc.).

Often, the home state's 529 Plan has advantages for in-state residents. In Connecticut the 529 Plan is called the Connecticut Higher Education Trust (CHET). Connecticut residents who enroll in CHET may claim a Connecticut state income tax deduction for their contributions to the Plan. To find more information about CHET go to: www.aboutchet.org.

Asset Specific Training:

There is important information that must be shared with IDA participants who are saving for this asset:

- What is a 529 Plan?
- Is a 529 Plan right for you?
- Choosing the right 529 Plan
- How to decide what investment options are right for you.
- How to enroll in a 529 Plan.

Information on these topics can be found at www.collegesavings.org and www.aboutchet.org. Questions about CHET can be answered by calling the toll free number: (888)799-CHET.

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Date: 08-01-2012	12-01	Section: 1300
Topic: IDA Program Certification		

IDA Program Certification

Agencies operating a DOL IDA programs are already certified. A community-based organization seeking certification of its existing or proposed IDA program (not part of the CT IDA Initiative) should submit its request and appropriate documentation to the Department of Labor.

The State certification process applies to all existing IDA programs -- Federal, State and private programs. Certification is similar to a license that guarantees the program operates consistent with certain minimal quality standards. Ideally, such certification should make a program more competitive when applying for funds (public or private). Please note that programs are certified, not the agency that operates them. Therefore, each program within an agency would need to apply for separate certification.

DOL implemented the certification process and published the application process on our web site (www.ctdol.state.ct.us/ida/dir/idaprogdertif.html). A CBO seeking certification of its existing or proposed IDA program needs to submit its request to DOL. The Department will review each request for certification and notify the community-based organization whether the organization's request for certification has been approved or disapproved.

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Appendix A

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2017	80% HUD Area Annual Median Income based on a Family Size of...							
Town	1	2	3	4	5	6	7	8
Andover	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Ansonia	52360	59840	67320	74800	80784	86768	92752	98736
Ashford	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Avon	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Barkhamsted	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Beacon Falls	52360	59840	67320	74800	80784	86768	92752	98736
Berlin	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Bethany	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Bethel	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Bethlehem	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Bloomfield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Bolton	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Bozrah	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Branford	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Bridgeport	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Bridgewater	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Bristol	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Brookfield	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Brooklyn	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Burlington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Canaan	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Canterbury	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Canton	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Chaplin	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Cheshire	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Chester	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Clinton	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2
Colchester	61432	70208	78984	87760	94780.8	101801.6	108822.4	115843.2
Colebrook	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Columbia	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Cornwall	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Coventry	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Cromwell	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Danbury	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Darien	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Deep River	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2
Derby	52360	59840	67320	74800	80784	86768	92752	98736
Durham	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
East Granby	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
East Haddam	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
East Hampton	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
East Hartford	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
East Haven	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
East Lyme	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
East Windsor	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Eastford	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Easton	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Ellington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Enfield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Essex	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2

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Fairfield	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Farmington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Franklin	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Glastonbury	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Goshen	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Granby	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Greenwich	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Griswold	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Groton	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Guilford	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Haddam	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Hamden	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Hampton	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Hartford	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Hartland	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Harwinton	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Hebron	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Kent	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Killingly	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Killingworth	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2
Lebanon	61432	70208	78984	87760	94780.8	101801.6	108822.4	115843.2
Ledyard	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Lisbon	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Litchfield	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Lyme	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Madison	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Manchester	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Mansfield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Marlborough	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Meriden	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Middlebury	35280	40320	45360	50400	54432	58464	62496	66528
Middlefield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Middletown	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Milford	52360	59840	67320	74800	80784	86768	92752	98736
Monroe	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Montville	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Morris	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Naugatuck	35280	40320	45360	50400	54432	58464	62496	66528
New Britain	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
New Canaan	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
New Fairfield	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
New Hartford	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
New Haven	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
New London	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
New Milford	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Newington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Newtown	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Norfolk	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
North Branford	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
North Canaan	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
North Haven	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
North Stonington	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Norwalk	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8

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Norwich	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Old Lyme	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Old Saybrook	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2
Orange	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Oxford	52360	59840	67320	74800	80784	86768	92752	98736
Plainfield	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Plainville	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Plymouth	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Pomfret	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Portland	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Preston	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Prospect	35280	40320	45360	50400	54432	58464	62496	66528
Putnam	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Redding	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Ridgefield	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Rocky Hill	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Roxbury	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Salem	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Salisbury	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Scotland	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Seymour	52360	59840	67320	74800	80784	86768	92752	98736
Sharon	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Shelton	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Sherman	64232	73408	82584	91760	99100.8	106441.6	113782.4	121123.2
Simsbury	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Somers	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
South Windsor	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Southbury	35280	40320	45360	50400	54432	58464	62496	66528
Southington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Sprague	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Stafford	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Stamford	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Sterling	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Stonington	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Stratford	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Suffield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Thomaston	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Thompson	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Tolland	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Torrington	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Trumbull	48328	55232	62136	69040	74563.2	80086.4	85609.6	91132.8
Union	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Vernon	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Voluntown	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Wallingford	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Warren	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Washington	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Waterbury	35280	40320	45360	50400	54432	58464	62496	66528
Waterford	45976	52544	59112	65680	70934.4	76188.8	81443.2	86697.6
Watertown	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
West Hartford	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
West Haven	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Westbrook	59472	67968	76464	84960	91756.8	98553.6	105350.4	112147.2

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Weston	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Westport	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Wethersfield	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Willington	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Wilton	79968	91392	102816	114240	123379.2	132518.4	141657.6	150796.8
Winchester	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Windham	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4
Windsor	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Windsor Locks	50232	57408	64584	71760	77500.8	83241.6	88982.4	94723.2
Wolcott	35280	40320	45360	50400	54432	58464	62496	66528
Woodbridge	49336	56384	63432	70480	76118.4	81756.8	87395.2	93033.6
Woodbury	51352	58688	66024	73360	79228.8	85097.6	90966.4	96835.2
Woodstock	40824	46656	52488	58320	62985.6	67651.2	72316.8	76982.4

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Appendix B

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2017 Poverty Guidelines

The following figures are the 2017 HHS poverty guidelines which are scheduled to be published in the *Federal Register* on January 31, 2017.

2017 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA	
Persons in family/household	Poverty guideline
1	\$12,060
2	16,240
3	20,420
4	24,600
5	28,780
6	32,960
7	37,140
8	41,320
For families/households with more than 8 persons, add \$4,180 for each additional person.	

Source: <http://aspe.hhs.gov/poverty/15poverty.cfm>

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Appendix C

**POLICY FOR TRANSFERRING PARTICIPANTS AMONG
CONNECTICUT INDIVIDUAL DEVELOPMENT ACCOUNT (IDA) PROGRAMS
Effective 6/5/2012**

DEFINITIONS

- Grantee – An organization that receives funding from the Connecticut Department of Labor to operate an IDA Program.
- CT IDA Program – An IDA Program supported by a grant from the DOL. This can be either an IDA Initiative Program or a Housing Trust Fund (HTF) IDA Program.
- Project Participant – An individual who is enrolled in either a CT IDA Initiative Program or a CT Housing Trust Fund IDA Program.

BACKGROUND

On certain occasions, there may be a justification for moving an IDA participant from one Department of Labor Individual Development Account Program to another. This could be from one CTIDA Initiative Program to another CTIDA Initiative Program, from one CT Housing Trust Fund IDA Program to another CT Housing Trust Fund IDA Program, or between a CTIDA Initiative Program and a CT Housing Trust Fund IDA Program. Possible reasons for a transfer might be:

- To give a participant more time to save.
- To allow a participant to purchase an asset not allowed by the original program in which they were enrolled.
- To transfer a participant nearing completion of the program to an older existing grant with open slots so that a slot can be opened up in a newer grant.

POLICY GUIDANCE

NOTE: No grantee is allowed to transfer participants between IDA programs without first getting approval from the Connecticut Department of Labor (leslie.white@ct.gov)

The request for transfer must be sent to DOL in writing and must include:

- The reason for requesting the transfer (see above list of possible reasons)
- The name of the participant to be transferred
- The grants between which you are requesting to transfer the participant
- Amount of savings in the participant's IDA at the time of the transfer
- Amount of "matching funds" retained in the original Program's Reserve Account as a result of the transfer.

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With DOL permission, grantees may allow an eligible IDA participant to be transferred from one IDA Program to another administered by that grantee without requiring the participant to re-enroll in financial literacy courses or other training, except for additional asset-specific training if the participant has changed his/her savings goal. Grantees may choose to require participants to attend additional training, if needed. A transferred participant may withdraw funds for allowable uses from an IDA started under the new CT IDA program after the participant has been enrolled (i.e. account opened) in either of the CT IDA Programs for at least a combined total of six months.

Limitations:

Every effort must be made to ensure the participant is initially screened and enrolled in the most appropriate IDA grant to maximize success and minimize the need to transfer the participant to another grant as a “back-up” strategy.

- The participant is in good standing with the IDA Program and is eligible for transfer.
- The participant is current with the financial literacy training requirements.
- The participant has a consistent record of saving according to the Savings Plan Agreement.
- The participant is abiding with other program requirements. (The grantee may establish specific criteria for determining when a participant is in good standing.)
- The participant has been enrolled (i.e. account opened) in either of the CT IDA Programs for at least a combined total of six months.
- The participant understands that he/she can only be transferred once.
- The participant has not withdrawn any funds for emergency expenses or for qualified purchases from his or her IDA. A participant may not be transferred after withdrawing funds.

REQUIRED PROCEDURES

A grantee must do the following when a participant is transferred from one IDA Program to another:

- 1) Retain “matching” funds that had been set aside for the participant in the original project’s Reserve Account.
- 2) Allocate “matching” funds in the new project’s Reserve Account for the transferred participant. (These funds must be available before the grantee may transfer a participant.)
- 3) Update participant Savings Plan Agreement (Grant, Savings Goal, etc.).
- 4) Record details of the transfer in both project files and program narratives for review by program officials, evaluators, auditors, and others:
 - a) Date of the transfer;
 - b) Participant’s or grantee’s reason for requesting the transfer;

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- c) Amount of savings in the participant's IDA at the time of the transfer;
 - d) Amount of "matching funds" retained in the original Program's Reserve Account as a result of the transfer.
- 4) Record the transferred account as "Transferred/Closed" in the original project file.
 - 5) Record the transferred account as "Transferred/Opened" in the new project file.
 - 6) Report details about the transfer, as noted in #4 above, on the yearly Narrative Report of both the original and the new IDA Program.