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June 21, 2000

SENT VIA FACSIMILE AT (504)529-1008,  
WITH HARD COPY TO FOLLOW IN MAIL

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that your program adopt a policy for determining what constitutes a family unit in shared living situations. This policy should be part of your 1611.5 guidelines for determining the eligibility of potential clients. Client files should indicate when a special determination of family unit size is made (i.e. whenever the size of the family unit is determined to be different than the number of people sharing living space.) You may want to consult with Pat Hanrahan, Program Counsel for your area, if you have further questions about this. The Office of Legal Affairs can review any situation that presents a difficult question.

For further guidance, the following table lists prior OLA/OGC opinions on this question:

DATE	OLA DETERMINATION
May 12, 1993	Disabled adult is a separate family unit from her mother and step father with whom she lives because the parents resources are not available to her.
January 8, 1991	Adult renting a room from her uncle at a reduced rate is a separate family unit from him, although rent reduction might be imputed income to the client.