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Income Limits for Eligibility into the Inflation Reduction Act Rebates

If I understand it correctly, participation in the Inflation Reduction Act rebate programs is limited to people whose income does not exceed 150% of the person's Area Median Income (AMI). I have questions and comments on both the income definition and the AMI.

Regarding the income issue, I am retired and my income is from a pension, Social Security, and some withdrawals from my standard Individual Retirement Account (IRA). I also transferred some funds from my standard IRA to my Roth IRA, and those transferred funds are also considered a part of my total income, even though the transferred funds are not usable at this time. I request that a person's total income definition be adjusted to delete income from IRA withdrawals or transfers, in order to determine eligibility for the Inflation Reduction Act rebate program.

Regarding the AMI limit, I believe the value is based on a regional average. I live in Redondo Beach in Los Angeles County and there is considerable variation in income levels within the regions of Los Angeles County. The FY2021 AMI for my region (Los Angeles-Long Beach-Glendale, CA HUD Metro FMR Area) is \$87,600. The FY2021 AMI for my city Redondo Beach is \$123,900. The eligibility for the Inflation Reduction Act rebate program is based on not exceeding 150% of the AMI. Since I reside in Redondo Beach with a higher AMI, I request that a person may use their local AMI value instead of the regional AMI value for eligibility determination.

Thank you for your consideration of my request on income exception for IRA withdrawals/transfers, and allowing the use of local AMI values to determine income limits.