Multifamily EIV for Users

05/14/2015

Heather Staggs, AHM, CPO, FHC

Copyright 2015 S.T.A.R. Momentum Training and Consulting, LLC in Partnership with Piltch and Associates

Not for duplication or distribution without prior consent
Before We Begin...

- Feel Free to Ask Questions as We Go
- Follow Company Policies
- DO NOT IMPLEMENT ANYTHING YOU HEAR TODAY WITHOUT APPROVAL
- Refer Housing Notice 2013-6 or the HUD Handbook

BACKGROUND
History of EIV

• 2001: OMB released the President’s Management Agenda which established the reduction of erroneous payments as a key government-wide priority, evidenced by the *Eliminating Improper Payments* initiative, which requires agencies to measure improper payments annually, develop improvement targets and corrective actions, and track results

• HUD established the RHIIP initiative to address the causes of errors and improper payments in HUD’s assisted housing programs and to ensure that the right benefits go to the right persons

History of EIV

• To assist in meeting the RHIIP initiative goals, HUD developed and began implementation of the Upfront Income Verification (UIV) system, now known as the EIV system

• The UIV system was originally only available to PHAs

• Provided income information on wages and unemployment benefits provided through matching agreements with individual states
History of EIV

• 2004: HUD received statutory authority to negotiate a matching agreement with the Department of Health and Human Services (HHS) to conduct computer matching with National Directory of New Hires (NDNH) data
• While the first matching agreement between HUD and HHS only made the NDNH data available to PHAs, a subsequent agreement was reached in FY 2007 making the information available to Multifamily Housing’s O/As, CAs and the OIG

HHS later approved disclosure of NDNH information to Independent Public Auditors (IPAs)
• In addition to the NDNH data, the data received from the Social Security Administration (SSA), formerly available for use by O/As through the Tenant Assessment Subsystem (TASS), was also made available through the EIV system
History of EIV

- On December 29, 2009, the Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification System – Amendments; Final Rule was published in the Federal Register
- This made the use of the entire EIV system mandatory by PHAs and O/As, effective January 31, 2010

Subsequent Guidance

- Housing Notice 2013-06
- Change 4 of the HUD Occupancy Handbook 4350.3, REV-1
  - which was issued by HUD on August 7, 2013, is to provide updated instructions for using EIV by HUD Multifamily Owners and Agents (O/As).
KEY TERMS

Key Terms

• EIV = Enterprise Income Verification
• UIV = Upfront Income Verification
• SSA = Social Security Administration
• SSI = Supplemental Social Security
• HHS = Health and Human Services
• NDNH = National Directory of New Hires
• SWICA = State Wage Income Collection Agency
• IPA = Independent Public Auditor
HUD Terminology

- The Department of Housing and Urban Development (HUD):
  - **Must**: You are required to take the action specified.
  - **Cannot/Must Not**: The action is strictly prohibited.
  - **May**: You may choose to take action or not, must be consistent though
  - **Should**: The action is recommended.
  - **Can**: You have permission to take the action.

Key Players

- HUD
- O/A = Owner/Agent
- Tenant = Resident
- Head of Household = HOH
Run, Review and Follow-Up on the 7 EIV Reports Available

1. Existing Tenant Search;
2. Income Reports (Summary Report, Income Report and Income Discrepancy Report);
3. New Hires Report;
4. No Income Reports (No Income Reported on 50059 and No Income Reported by HHS or SSA);
5. Multiple Subsidy Report;
6. Identity Verification Reports {Not Verified (verification in process), Failed EIV Pre-screening Report and Failed Verification Report (Failed the SSA Identity Test)}; and

Applicability of the EIV System

The EIV System applies to the following programs:

- Project-based Section 8
  - New Construction
  - State Agency Financed
  - Substantial Rehabilitation
  - Section 202/8
  - Rural Housing Services (RHS) Section 515/8
  - Loan Management Set-Aside (LMSA)
  - Property Disposition Set-Aside (PDSA)
- Section 202/162 Project Assistance Contract (PAC)
- Section 202 Project Rental Assistance Contract (PRAC)
- Section 811 Project Rental Assistance Contract (PRAC)
- Section 811 Project Rental Assistance Demonstration units under a Rental Assistance Contract
- Section 236
- Section 236 Rental Assistance Payment (RAP)
- Section 221(d)(3) Below Market Interest Rate (BMIR)
- Section 101 Rent Supplement
Requirements for Using EIV Data – Existing Tenant Search and Other EIV Reports

O/As **must**:  
- Use the Existing Tenant Search in EIV as part of their screening criteria to determine if any applicant member is receiving subsidy at another location.  
  - Include written policies for using the search in their Tenant Selection Plan; and  
- Have written policies and procedures for staff to follow for using the other EIV Reports, including the Income Report as third party verification of employment and income.

Required HUD Forms:  
Form HUD-9887 and Form HUD-9887-A

Forms HUD 9887, Notice and Consent to the Release of Information, and HUD 9887-A, Applicant’s/Tenant’s Consent to the Release of Information, are valid for 15 months from date of signature. They **must** be signed **AND** dated by:  
- The head of household, spouse or co-head, regardless of age  
- Family members 18 and older; and family members upon turning 18.

In Order to Conduct:  
- Move-ins;  
- Initials (when a household begins receiving subsidized rent, e.g., when a Section 236 household begins receiving Section 8); and  
- Annual recertifications.

**NOTE:** The EIV Notice states tenants must sign the HUD-9887 on or immediately after their 18th birthday.
HUD-9887 Requirement for Using EIV System and EIV Data

Signed **AND** dated HUD-9887:

For Applicants:
• Does not need to be on file in order to use the Existing Tenant Search in EIV at the time of application processing and tenant screening.

For Residents:
• **Must** be on file before O/A can access EIV reports that contain employment or income data for a tenant.

Good Business Practice: Although the form HUD-9887-A is not required to be signed at the time a tenant turns 18, it is illogical to not have them sign and date this document when they sign and date form HUD-9887.

Consent to Disclose an Individual’s EIV Information to Another Person or Entity

• “The Federal Privacy Act (5 USC 552a, as amended) prohibits the disclosure of an individual’s EIV information to another person without the written consent of such individual…”

• O/As are not prohibited from discussing with the head of household how the household’s income and rent were determined based on the total income that was reported and verified.

  ▪ **NOTE:** The Handbook does not state that the head of household has permission to review other members actual EIV Report without written consent.

  ▪ Exhibit 9-4 of the Handbook, Sample Tenant Consent to Disclose EIV Income Information, can be used by the O/A to obtain written tenant consent.
Resident/Applicant Notification of EIV –“EIV & You” Brochure

O/As **must** provide the “EIV & You” brochure to:

Applicants:
- Who have been selected from the waiting list for screening and final application processing; and

Tenants:
- At the time of annual recertification.

Storage of EIV Data: Master File(s)

- Specific EIV Reports that must be maintained in a Master File include:
  1. New Hires Summary Report
  2. Multiple Subsidy Summary Report
  3. Failed EIV Pre-screening Report
  4. Failed Verification Report (Failed the SSA Identity Test)
  5. Deceased Tenant Report

- The Master File may be maintained as an individual file by report title or as a Master Reports Binder separated by report title.

- The Master File must be kept in a locked, secured location.

- Each EIV Report must be maintained in the Master File for 3 years.
Storage of EIV Data: Master File(s)

**Good Business Practices:**

- Maintain a Master File Binder organized first by month and then report title.

- Print and store the Income Information Summary Page (screen shot from EIV system), No Income Reported on 50059, No Income Reported by HHS or SSA and Not Verified (verification in process) in the Master File Binder.

- Maintain a Monthly Summary Log to document resolutions of discrepant information.

Storage of EIV Data: Resident File Folder

- Tenant File Folder **must:**
  - Contain the Detail portion of the following EIV Reports, and documentation of resolution as applicable for the term of tenancy, plus 3 years:
    1. Existing Tenant Search
    3. New Hires Detail Report
    4. Multiple Subsidy Detail Report

Be kept in a locked, secured location
## Storage of EIV Data: Resident File Folder

### Good Business Practice:
- To print and store the following reports in the Resident File Folder:
  - No Income Reported on 50059
  - No Income Reported by HHS or SSA
  - Not Verified (verification in process)
  - Failed EIV Pre-screening Report
  - Failed Verification Report (Failed the SSA Identity Test)
  - Deceased Tenant Report

### NOTE:
“Black-out” or cut all data regarding other households that may be listed on a report before filing in each resident’s file.

<table>
<thead>
<tr>
<th>EIV Report</th>
<th>Reporting Requirement / Frequency of Reports</th>
<th>File Retention Location / Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Existing Tenant Search</strong></td>
<td>For each applicant household member regardless of age at time of application processing</td>
<td>Application File Not admitted: Retain with the application for 3 years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenant File Admitted: Retain with the application for term of tenancy, plus 3 years</td>
</tr>
<tr>
<td><strong>Income Information</strong></td>
<td></td>
<td>Tenant File / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td>Summary Report</td>
<td></td>
<td>(Good Business Practice: Income Information By Contract/Project Number) Summary Sheet: Master File</td>
</tr>
<tr>
<td>Income Report</td>
<td></td>
<td>Tenant File / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td>Income Discrepancy Report</td>
<td></td>
<td>Tenant File / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td><strong>No Income Reports</strong></td>
<td>Recommended By HUD At least Quarterly (Select “All” Months)</td>
<td>Not Required * (Good Business Practice: Master File / Term of Tenancy, plus 3 years)</td>
</tr>
<tr>
<td>No Income Reported on 50059</td>
<td></td>
<td>Tenant File New Hires Summary Report for 3 years</td>
</tr>
<tr>
<td>No Income Reported by HHS or SSA</td>
<td></td>
<td>Tenant File New Hires Detail Report for each tenant / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td><strong>New Hires Report</strong></td>
<td>At least Quarterly (Select “All” Months)</td>
<td>Tenant File New Hires Summary Report for 3 years</td>
</tr>
<tr>
<td><strong>Multiple Subsidy Report</strong></td>
<td>At least Quarterly (Select &quot;All household members&quot;)</td>
<td>Tenant File Multiple Subsidy Summary Report for 3 years</td>
</tr>
<tr>
<td><strong>Identity Verification Report</strong></td>
<td>Monthly (Select “All” Months)</td>
<td>Tenant File Multiple Subsidy Detail Report for each tenant / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td>Not Verified (verification in process)</td>
<td></td>
<td>(Good Business Practice: Run and File Not Verified Report same as both Failed Reports)</td>
</tr>
<tr>
<td>Failed EIV Pre-screening Report</td>
<td></td>
<td>Master File Failed EIV Pre-screening Report / Failed Verification Report for 3 years</td>
</tr>
<tr>
<td>Failed Verification Report (Failed the SSA Identity Test)</td>
<td></td>
<td>Tenant File Documentation to verify discrepant personal identifiers / Term of Tenancy, plus 3 years</td>
</tr>
<tr>
<td><strong>Deceased Tenant Report</strong></td>
<td>At least Quarterly (Select “All” Months)</td>
<td>Tenant File Deceased Tenants Report for 3 years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tenant File Documentation and/or correspondence to verify / Term of Tenancy, plus 3 years</td>
</tr>
</tbody>
</table>
Existing Tenant Search – Purpose

O/As must:

- Run the Existing Tenant Search for each applicant household member, regardless of age.

- Review the report to determine if any applicant household member is currently being assisted at any Multifamily Housing (Multifamily) or Public and Indian Housing (PIH) location.

Chapter 9, Paragraph 9-12.A

EIV Training: Section 2A - Reports

Existing Tenant Search – Required Follow-Up, As Applicable

O/As must:

- Discuss with the applicant if the report identifies that the applicant or any household member is residing at another Multifamily or PIH location; and

- Follow up with the respective O/A or PHA to confirm the individual’s program participation status before admission.

  - Good Business Practices:
    - Coordinate move-out/move-in dates with the applicant’s existing O/A or PHA.
    - Create a subsidy termination form to be sent to and be completed by the applicant’s existing landlord.

Chapter 9, Paragraph 9-12.A

EIV Training: Section 2A - Reports
Existing Tenant Search – Accessing by “Verification Reports”

Enter the SSN for applicant - Click “Get Report.” Repeat for each applicant household member, regardless of age.
Existing Tenant Search Example – No Match Found

O/As must print this report and place with applicant’s file. If applicant is admitted/moves in, application and Existing Tenant Search must be filed in the Tenant File for term of tenancy plus 3 years. If applicant is not admitted, Existing Tenant Search must be retained for 3 years.

EIV Training: Section 2A - Reports

Existing Tenant Search Example – Match Found

O/As must print this report and place with applicant’s file. If applicant is admitted/moves in, application and Existing Tenant Search must be filed in the Tenant File for term of tenancy plus 3 years. If applicant is not admitted, Existing Tenant Search must be retained for 3 years.

EIV Training: Section 2A - Reports

Good Business Practices: Document follow up with the Multifamily O/A and/or PHA at the other location confirming applicant is receiving rental assistance. If confirmed, send a “Subsidy Termination” verification form to them to coordinate move-out/move-in dates.

EIV Training: Section 2A - Reports
Summary Report – Use and Retention Requirements

O/As must:

- Run and review the Summary Report for all household members at time of recertification (annual and interim) or within 90 days after MI/IC transmission to TRACS.

- Retain in Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.A

EIV Training: Section 2A - Reports

Summary Report – Purpose

- Used to confirm the Identity Verification Status for each household member. Statuses include:
  - Verified
  - Not Verified
  - Failed
  - Deceased

- This report includes, but is not limited to, the personal identifiers (Last Name, DOB and SSN) of each household member from the current, active form HUD-50059 (aka ‘59) in TRACS at the time of the income match.

Chapter 9, Paragraph 9-11.A.1

EIV Training: Section 2A - Reports
Summary Report – Accessing by “By Head of Household” Under “Income Information” Heading

The Summary Report is to be printed ONCE, so long as all members of the household have been “Verified,” AND there have been no changes to the household composition.

EIV Training: Section 2A - Reports

Summary Report Example #1 – “Verified” Identity Verification Status

Verified – Personal identifiers (Last Name, DOB and SSN) match the SSA database.

- If all household members have a “Verified” Identity Verification Status, the Summary Report will only need to be printed ONCE, so long as there have been no changes to the household composition.

- Retain in Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.A

EIV Training: Section 2A - Reports
Summary Report Example #2 – “Not Verified” Identity Verification Status

**Not Verified** – Personal identifiers have not yet been sent by HUD to SSA for validation or the validation is in process by SSA.

<table>
<thead>
<tr>
<th>Member SSN</th>
<th>Member First Name</th>
<th>Member Last Name</th>
<th>Date of Birth</th>
<th>Age</th>
<th>Relationship</th>
<th>Identity Verification Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>***.1111</td>
<td>JANE</td>
<td>SMITH</td>
<td>X/XX/1976</td>
<td>45</td>
<td>Head of Household</td>
<td>Not Verified</td>
</tr>
</tbody>
</table>

- O/As do not have to do anything at the time of recertification when the status is “Not Verified.”
- However, the O/A **must** check the Identity Verification Report monthly to ensure that household member’s status has not changed to “Failed,” at which point further action is required.
- Retain in Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.A  
RHIIP Listserv #272

EIV Training: Section 2A - Reports

Summary Report Example #3 – “Failed” Identity Verification Status

**Failed** – Personal identifiers do not match the SSA database.

<table>
<thead>
<tr>
<th>Member SSN</th>
<th>Member First Name</th>
<th>Member Last Name</th>
<th>Date of Birth</th>
<th>Age</th>
<th>Relationship</th>
<th>Identity Verification Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>***.1111</td>
<td>JANE</td>
<td>SMITH</td>
<td>X/XX/1976</td>
<td>45</td>
<td>Head of Household</td>
<td>Failed</td>
</tr>
</tbody>
</table>

- O/As **must** review and resolve “Failed” household member(s).
- Topic will be detailed during review of Identity Verification Report.
- Retain with Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.A

EIV Training: Section 2A - Reports
Summary Report Example #4 – “Deceased” Identity Verification Status

Deceased – SSA’s records indicate the person is deceased.

<table>
<thead>
<tr>
<th>Member SSN</th>
<th>Member First Name</th>
<th>Member Last Name</th>
<th>Date of Birth</th>
<th>Age</th>
<th>Relationship</th>
<th>Identity Verification Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1111</td>
<td>JANE</td>
<td>SMITH</td>
<td>XXXX/1976</td>
<td>37</td>
<td>Head of Household</td>
<td>Deceased</td>
</tr>
</tbody>
</table>

- O/As must review and resolve “Deceased” household member(s).
- Topic will be detailed during review of Deceased Tenant Report.
- Retain with Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.A

EIV Training: Section 2A - Reports

Summary Report – SSN Disclosure Exemptions

Two (2) Exemptions to SSN Disclosure and Verification Requirements:

- Tenants who were 62 years of age or older as of January 31, 2010, and whose initial determination of eligibility began before January 31, 2010; and

- Individuals who do not contend eligible immigration status.

These individuals will continue to have a TRACS generated identification number in the SSN field. No employment or income information will be provided in EIV for these individuals; therefore, third party verification from the income source must be obtained.

Chapter 9, Paragraph 9-11.A.3.d

EIV Training: Section 2A - Reports
Income Report –
Use and Retention Requirements

O/As must:

- Run and review the Income Report for all household members at time of recertification (annual and interim) or within 90 days after MI/IC transmission to TRACS.

  Good Business Practices: Discuss this report (and others) during the recertification interview. Have each adult household member sign and date an affidavit of agreement or disagreement with the content of the report. This can also be done on a printed copy of the Certification Page screen shot (this will be discussed in detail later in the training).

- Retain in Tenant File for Term of Tenancy, plus 3 years.

  Chapter 9, Paragraph 9-11.B

Income Report – Use of the Content from National Directory of New Hires (NDNH)

The Income Report displays employment information, wages and unemployment compensation data reportable in the EIV system for all household members. This data is obtained from the NDNH database through the Department of Health and Human Services (HHS). The information from this section of the report:

- **Must** be used as third party verification of the tenant’s employment status *unless disputed by the tenant; but*

- **Must not** be used to calculate the tenant’s income and rent, regardless of whether it is confirmed or disputed by the tenant.

  Chapter 9, Paragraph 9-11.B.3

EIV Training: Section 2B - Reports
The Income Report also displays SS, SSI, Dual Entitlement, Medicare Data and SSA disability status data reportable in the EIV system for all household members. This information is obtained from the SSA's database. The information from this section of the report:

- **Must** be used as third party verification of the tenant’s income *unless disputed by the tenant*; and

- **Must** be used to calculate the tenant’s income and rent *unless disputed by the tenant*.

Chapter 9, Paragraph 9-11.B.4

---

The Income Report does not include other income the household may receive, from sources that are not reportable in the EIV system, such as:

- Welfare/TANF Benefits
- SSP (State Supplement Program) Payments, as applicable
- Child Support and/or Alimony
- Recurring Gifts
- Wages not contained in the NDNH database
- Most Pensions

NOTE: Pensions received from State Street, General Electric (GE) and others may be listed as “wages” on the Income Report because that is how they are reflected in the NDNH database; however these must be listed in form HUD-50059 as “pensions” even though it may result in recurring Income Discrepancy Reports.

Chapter 9, Paragraph 9-11.B.2
Income Report – Documentation Requirements (No Dispute vs. Disputed)

The following documentation is **required** to be in the tenant file to demonstrate compliance with mandated use of the EIV system:

**No Dispute of EIV Information by Tenant:**
- EIV Income Report;
- Current acceptable tenant-provided documentation (4 current, consecutive paystubs); and
- If necessary as determined by the O/A, third party verification from the source.

**Disputed EIV Information by Tenant:**
- EIV Income Report; and
- Third party verification from the source.

*Chapter 9, Paragraph 9-9.A&B*

EIV Training: Section 2B - Reports

---

Income Report – Documentation Requirements
Tenant-Reported Income Not Verified in EIV System

The following documentation is **required** to be in the tenant file to demonstrate compliance with mandated use of the EIV system:

**Tenant-reported income not verified through (but otherwise reportable in) the EIV system:**

- EIV Income Report;
- Current acceptable tenant-provided documentation and/or
- Third party verification from the source.

*Chapter 9, Paragraph 9-9.C*

EIV Training: Section 2B - Reports
Income Report - Accessing “By Contract Number” Under “Income Information” Heading

Once you have selected the property & recertification month, this report will populate.

Good Business Practice: Print and place in the Master File or Binder.

The results show that for the selected “Contract,” there are a total of 7 households with Income Reports for December.

EIV Training: Section 2B - Reports

Income Report – Accessing by Income Report Summary Screen

Good Business Practice: Cross reference EIV Household listing against a master recertification listing to ensure that all households have been accounted for. If any household is missing, search “By Head of Household”, print report AND run “Identity Verification Report” to determine if further action is needed. Print the “Income Report Summary” screen and place in the Master File or Binder.

EIV Training: Section 2B - Reports
To view the "Income Report" for a specific household, click on the HOH’s SSN.

Displays the most recent employment information (W-4) by Tenant, per the State’s Wage Information Collection Agencies (SWICAs) reported to Department of Health and Human Services’ (HHS) National Directory of New Hires (NDNH) Database.
Income Report Example - Michael John
Gross & Net SS Benefits Match

Note: There is no Difference between Gross & Net Social Security Benefits Amounts. Detail To Follow.

Income Report Example - Michael John
Gross & Net SSA Benefits Do Not Match


Note the Difference between Gross & Net SS benefits amounts.
Income Report Example:
Dual Entitlement Benefits for Michael John

Dual entitlement benefits occur when: Two or more benefits are awarded at the same time, but not necessarily with the same date of entitlement; or, an auxiliary or survivor benefit is awarded after a primary award to the same person.

Displays "Dual Entitlement" benefits.

Income Report Example - Jane Smith
Supplemental Security Income (SSI) Benefits

Displays Federal & State (if any) Supplemental Security Benefits. Both amounts are counted in the determination of income.
Income Report Example – Jane Smith
SSA Disability Status

Not always accurate; AND Must Not be used to verify tenant's eligibility as an elderly/disabled household for purposes of the $400 allowance.

### Supplemental Security Income Benefits

<table>
<thead>
<tr>
<th>Verification Data</th>
<th>Payment History of Net Benefits Paid</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Federal Amount</td>
</tr>
<tr>
<td></td>
<td>Amount</td>
</tr>
<tr>
<td>2/23/2014 01</td>
<td>000.00</td>
</tr>
<tr>
<td>2/23/2014 02</td>
<td>000.00</td>
</tr>
<tr>
<td>2/23/2014 03</td>
<td>000.00</td>
</tr>
</tbody>
</table>

Chapter 9, Paragraph 9-11.B.4.h

EIV Training: Section 2B - Reports

### Income Report Use for New Admissions

(New Move-ins & Households with IC)

- Income Report must be reviewed within 90 days after transmission of each Move-In (MI) 50059 and Initial Certification (IC) 50059 to TRACS.

  **Good Business Practice:** Re-run and review the Income Report every 30 days until this report populates.

- Income Discrepancies must be resolved within 30 days of the print date of the report.

- Retain printed report(s) and documentation of discrepancy resolution in Tenant File for Term of Tenancy, plus 3 years.

Chapter 9, Paragraph 9-11.B.5

EIV Training: Section 2B - Reports
No Income Reports – Use and Retention Requirements

- Reports Not Required; however HUD recommends running these reports at least Quarterly.
  
  **Good Business Practice:** Include these reports in your site’s EIV policy and run them on a quarterly basis.

- Retention Not Required; reference your site’s EIV policy and procedures and follow the retention requirements set forth therein.
  
  **Good Business Practice:** Retain in Tenant File for Term of Tenancy, plus 3 years.

  Chapter 9, Paragraph 9-11.D

EIV Training: Section 2B - Reports

No Income Reported on 50059 - Purpose

- The No Income Reported on 50059 report provides a list of households that reported zero income on their most recent certification.

  **Good Business Practice:** Use this report as a tool for complying with your company’s Zero Income Policy. Require any adult who reports zero income to complete a detailed self-certification documenting how they pay for daily living expenses (at least quarterly).

  Chapter 9, Paragraph 9-11.D.1.a

EIV Training: Section 2B - Reports
No Income Reported by HHS or SSA - Purpose

- The No Income Reported by HHS or SSA (formerly No Income Report) lists tenants who passed the identity match but no employment or other income information was reported to the EIV system from NDNH or SSA records.

- Even though no income was reported to the EIV system as a result of the match against NDNH and SSA records, this does not mean that the tenant(s) does not have income.

- Tenant(s) could have welfare/public assistance, SSP, child support, alimony, recurring gifts, assistance, and/or pensions or other income not included in the EIV system.

Chapter 9, Paragraph 9-11.D.1.b

EIV Training: Section 2B - Reports

No Income Reports – Use Requirements When Part of Site EIV Policies & Procedures

O/As must:

- Use these two reports only as identified and described in their policies and procedures.

- Select recertification month as “All” when running the reports.

- Make sure that, at the time of recertification interviews, the right questions are asked so that the tenants are given the opportunity to disclose any and all income they receive.

Good Business Practice: Require any adult who reports zero income to complete a detailed self-certification documenting how they pay for daily living expenses (at least quarterly).

Chapter 9, Paragraph 9-11.D.1.a&b

EIV Training: Section 2B - Reports
No Income Reports – Accessing “By Contract Number” Under “Income Information”

The report generated after selecting “All” recertification months for a specific contract will identify all households who reported zero income on their most recent certification (No Income Reported on 50059) or who passed the identity match against SSA’s records, but no employment or income information was received from the match against either the NDNH or SSA databases (No Income Reported by HHS or SSA).

“By Contract Number” – These reports are automatically generated by contract number.

Good Business Practice: Review and print with First Reminder Notices when preparing for AR, along with the Income Report.

No Income Reports – “Monthly Report Summary” Page

Once you have selected the property & for “All” Recertification months, these two reports will populate.

Good Business Practice: Print and place in your Master File or Binder.

The results show that for the selected “Contract,” there is a total of 5 households with No Income Reported on 50059 and 1 household with No Income Reported by HHS or SSA for “All” Months.
No Income Reported on 50059 – Example for Contract # MA610000

Once the "No Income Reported on 50059" link is clicked, you will be able to view the households that reported zero income on their most recent certification.

Good Business Practice: Print this report and place in the Master File or Binder, and place a copy in each specific resident’s file. If more than one household is listed, O/A will need to “black-out” or cut all other tenant’s information and place each in their own specific tenant file.

No Income Reported by HHS or SSA – Example for Contract # MA610000

Once the “No Income Reported by HHS or SSA” link is clicked, you will be able to view the households that does not have employment or other income information reported in the EIV system from NDNH or SSA databases.

Good Business Practice: Print this report and place in the Master File or Binder, and place a copy in each specific resident’s file. If more than one household is listed, O/A will need to “black-out” or cut all other tenant’s information and place each in their own specific tenant file.
New Hires Report – Use and Retention Requirements

O/As **must:**

- Run the New Hires Report at least Quarterly for “All” recertification months.

- Retain New Hires **Summary** Report, along with notations as to the outcome of the contact with tenant, in Master File or Binder for 3 years.

- Retain New Hires **Detail** Report, along with any correspondence with tenant and any 3rd party verifications, in Tenant File for Term of Tenancy, plus 3 years.

  *Chapter 9, Paragraph 9-11.D.1.c*

EIV Training: Section 2B - Reports
New Hires Report - Purpose

This report identifies tenants who have started new jobs within the last six months. The information on this report contained in the EIV system is updated monthly.

O/As must use this report to determine:

- If any tenant started new employment and has not reported a change in income between recertifications; and
- If any tenant failed to report new employment at the time of recertification.

Chapter 9, Paragraph 9-11.D.1.c.1

EIV Training: Section 2B - Reports

New Hires Report – Required Follow Up

O/As must:

- Contact tenant to review the accuracy of the New Hires Report:
  - If the tenant confirms the information, O/As must request that the tenant provide documents for use in determining the tenant’s income (e.g. four current, consecutive pay stubs); or if necessary request 3rd party verification from the employer.
  - If the tenant disputes the information, O/As must obtain 3rd party verification from the employer and take action accordingly.
- Process a recertification to include the employment income, if necessary, in accordance with program requirements.

Chapter 9, Paragraph 9-11.D.1.c.3.b&c

EIV Training: Section 2B - Reports
New Hires Report – Accessing “By Contract Number” Under “Income Information”

This report can be accessed one of 4 ways: “New Hires Report”, “By Contract Number”, “By Project Number” or “By Head of Household”.

Good Business Practice: Click “New Hires Report”, select Contract(s) (recertification month defaults to “All”) and click “Get Report”.

Use this report to identify households who have members that may have started a new job within last 6 months.

This report must be run and reviewed for “All” recertification months on at least a quarterly basis.

New Hires Summary Report – Example for Contract # MA610000

The “New Hires Report Summary” lists all household members that have a “New Hires Detail Report”. O/As must print the “New Hires Summary Report” and place in the Master File or Binder.
New Hires Detail Report - Example for the Jane Smith Household

Once you click on the “Detail Reports” tab you will be able to view the “New Hires Detail Report” which includes employment information for each household listed in the “New Hires Summary Report”. O/A must print the “New Hires Detail Report” and place it, as well as all documentation of investigation and resolution, in the applicable Tenant File.

EIV Training: Section 2B - Reports

Income Report – Example for Jane Smith Household

• The Income Report populates when O/A clicks on the “HOH SSN” red hyperlink when viewing the “New Hires Summary Report” screen.

• It appears that this resident used to be or is currently employed by “Tri State Employment Services”.

• Contact tenant to review the validity of the report and follow up with third party as necessary.

EIV Training: Section 2B - Reports
Multiple Subsidy Report – Use and Retention Requirements

O/As **must:**

- Run the Multiple Subsidy Report at least Quarterly.
- Retain the Multiple Subsidy **Summary** Report, along with notations as to the outcome of contacts with the tenant and/or PHA or Multifamily O/A, in the Master File or Binder for 3 years.
- Retain the Multiple Subsidy **Detail** Report, along with all supporting documentation, in the Tenant File for Term of Tenancy, plus 3 years.

_Chapter 9, Paragraph 9-12.B_

EIV Training: Section 2C - Reports

Multiple Subsidy Report – Purpose and Required Follow Up

O/As **must:**

- Run this report to determine if a tenant is receiving subsidy assistance at another PIH or Multifamily (Multifamily) location.
- Discuss with tenant any results that show receipt of subsidy; and follow up with the respective PHA or Multifamily O/A, if necessary, to confirm that the tenant is being assisted at the property listed on the report.
- O/As may need to terminate the tenant’s assistance and/or tenancy based on the results of the investigation.

**Good Business Practice:** Review against the verification of subsidy termination that was done during application processing, if applicable.

_Chapter 9, Paragraph 9-12.B_

EIV Training: Section 2C - Reports
Multiple Subsidy Report – When Receipt of Multiple Subsidies is Not Prohibited

- HUD does not prohibit owners of partially subsidized projects from housing tenants who are receiving assistance through the Housing Choice Voucher program.

- While these tenants may appear on the Multiple Subsidy Report, HUD does not consider them as having double subsidy.

Example: A tenant that is residing in a Section 236 unit and receiving rental assistance through the Housing Choice Voucher program.

Chapter 9, Paragraph 9-12.B.NOTE

EIV Training: Section 2C - Reports

Multiple Subsidy Report – Accessing by “Verification Reports”

Select the “Contract” or “Project”. Click on “All household members”. Click “Search.”

EIV Training: Section 2C - Reports
Multiple Subsidy Summary Report Example – No Records Found

O/As must print and place the “Multiple Subsidy Summary Report” in the Master File or Binder.

EIV Training: Section 2C - Reports

Multiple Subsidy Summary Report Example – Records Found

O/As must print and place “Multiple Subsidy Detail Report”, documentation of investigation and documentation of resolution in the Tenant File.

EIV Training: Section 2C - Reports
Multiple Subsidy Detail Report
Example – Records Found

O/A must print and place the "Multiple Subsidy Detail Report" in the Tenant File.

EIV Training: Section 2C - Reports

Identity Verification Reports (Not Verified, Failed EIV Pre-screening Report & Failed Verification Report/Failed the SSA Identity Test): Use and Retention Requirements

O/A must:

- Run Monthly for “All” recertification months.
- Retain the Failed EIV Pre-screening Report and Failed Verification Report (Failed the SSA Identity Test), along with notations, in the Master File or Binder for 3 years.
- Retain documentation obtained to verify discrepant personal identifiers in the Tenant File for Term of Tenancy, plus 3 years.

Good Business Practice: Retain copies of all Identity Verification Reports (including the Not Verified (verification in process) Report) in the Tenant File as well.

Chapter 9, Paragraph 9-12.C

EIV Training: Section 2C - Reports
Identity Verification Reports (Not Verified, Failed EIV Pre-screening Report & Failed Verification Report/Failed the SSA Identity Test): Purpose

These three reports are used to clear up any invalid, discrepant or missing information in the TRACS database that was not identified and corrected at the time of recertification to ensure that all tenants’ employment and income information is matched.

- **Not Verified** (verification in process) – Identifies tenants whose personal identifiers have not yet been sent by HUD to SSA for validation or the validation is in process by SSA.
- **Failed EIV Pre-screening Report** – Identifies tenants who have not been sent to SSA for an identity match because they failed the EIV pre-screening test due to invalid or missing personal identifiers (Last name, DOB and SSN).
- **Failed Verification Report** (Failed the SSA Identity Test) – Identifies tenants who have failed the test because their personal identifiers do not match SSA’s records, as well as tenants who are deceased.

**Chapter 9, Paragraph 9-12.C**

EIV Training: Section 2C - Reports

---

Not Verified, Failed EIV Pre-screening Report & Failed Verification Report/Failed the SSA Identity Test: Required Follow Up

O/As **must:**

- Follow up with tenants identified on either of the three Identity Verification Reports (after confirming the accuracy of the data in TRACS).
- Confirm with the tenant Last Name, DOB and/or SSN.
- Obtain documentation from the tenant to verify any discrepant personal identifiers.
- Correct any discrepancies in TRACS within 30 days from the date of the report(s).
- Conduct 3rd party verifications of employment & income data.
- Encourage tenant to contact SSA to correct any inaccuracies in the SSA database.

**Chapter 9, Paragraph 9-12.C**

EIV Training: Section 2C - Reports
Exempt from SSN disclosure and verification requirements:

- Residents who were 62 years of age or older as of January 31, 2010, and whose initial determination of eligibility began before January 31, 2010; and,

- Individuals who do not contend eligible immigration status.

Chapter 9, Paragraph 9-12.C.1.NOTE

Identity Verification Reports – Accessing by “Verification Reports”
Identity Verification Summary Report – Example

Click on red hyperlink to determine which household has “Failed the SSA Identity Test.”

Identity Verification Detail Report – Example

As discussed previously, O/A must confirm, verify and follow-up on personal identifiers (Last Name, DOB and SSN) in TRACS, with the tenant and via 3rd party, if necessary. Third-party must be obtained for this household’s recertification.

O/A must print and place a copy of the Failed Verification Report in the Master File or Binder. Good Business Practice: Print and place a copy in the Tenant File. If more than one household is listed, O/A will need to “black-out” or cut all other tenant’s information and place each in their own specific tenant file.
Deceased Tenants Report - Use and Retention Requirements

O/As must:

- Run the Deceased Tenants Report at least Quarterly for “All” recertification months.

- Retain the Deceased Tenant Report in the Master File or Binder for 3 years.

- Retain any documentation and/or correspondence used to resolve the discrepancy in the Tenant File for the Term of Tenancy, plus 3 years.

  Chapter 9, Paragraph 9-12.D

EIV Training: Section 2C - Reports

Deceased Tenants Report – Purpose and Required Follow Up

The Deceased Tenants Report identifies tenants who are reported by the SSA as being deceased. O/As must:

- Confirm, in writing, with HOH, next of kin or emergency contact person (or entity) provided by the tenant whether or not the person is deceased.

- Update family composition (and income and allowances, if applicable) on the 50059, if the deceased person is not the sole household member.

- Process a Move-out 50059-A if the deceased person is a sole household member. (Effective date will be retroactive to the earlier of 14 days after the tenant’s death or the date the unit was vacated per Chapter 9, Paragraph 9-12.D of the Handbook.)

- Repay any overpayment of subsidy to HUD that was paid on behalf of the deceased tenant.

- Correct discrepant information in the TRACS system within 30 days from the date of the report.

  Chapter 9, Paragraph 9-12.D

  EIV Training: Section 2C - Reports
Deceased Tenants Report – Accessing by “Verification Reports”

Select the “Contract”, “Project” or “Property, select “All” Recertification Months. Click “Get Report.”

Deceased Tenants Report
Example – No Records Found

O/As must print the “Deceased Tenants Report” and place in the Master File or Binder.
Deceased Tenants Report
Example – Records Found

---

### Medicare Premiums

**Medicare premium paid by tenant:**
- Buy-in column is listed as “N”
- Include in the medical expense deduction

### Medicare premium paid by State or other entity:
- Buy-in column is listed as “Y”
- Do not include in the medical expense deduction

#### NOTE:
There will be a date in the “Buy-in Stop” column when State or other entity ceases payment of Medicare.

---

O/As **must** print and place in the Master File or Binder. O/A will need to “black-out” or cut all other tenant’s information and place each in their own specific tenant file.

---

<table>
<thead>
<tr>
<th>Premium</th>
<th>Buy-in</th>
<th>Buy-in Start</th>
<th>Buy-in Stop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hospital Insurance</td>
<td>$0.00</td>
<td>Not Available</td>
<td>Not Available</td>
</tr>
<tr>
<td>Supp. Med. Insurance</td>
<td>$110.50</td>
<td>Not Available</td>
<td>Not Available</td>
</tr>
</tbody>
</table>

---

EIV Training: Section 2C - Reports
Income Report – Medicare Data: Buy-in “N” Include Medical Expense Deduction on ’59

<table>
<thead>
<tr>
<th>Payment Status Code</th>
<th>Verification Data</th>
<th>Unemployment Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>C</td>
<td></td>
<td>$535.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Social Security Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Current Entitlement: 12/02/2012</td>
</tr>
<tr>
<td>Net Monthly Benefit if Payable: $535.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Income Report – Medicare Data: Buy-in “N” Include Medical Expense Deduction on ’59</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicare Data</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Date Received by EV: 11-SEP-12</td>
</tr>
</tbody>
</table>

Income Report - Medicare Data: Buy-in “Y” Do Not Include Medical Expense Deduction on ’59

<table>
<thead>
<tr>
<th>Social Security Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Current Entitlement: 12/02/2012</td>
</tr>
<tr>
<td>Net Monthly Benefit if Payable: $535.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Income Report – Medicare Data: Buy-in “N” Include Medical Expense Deduction on ’59</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicare Data</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Date Received by EV: 11-SEP-12</td>
</tr>
</tbody>
</table>

Income Report - Medicare Data: Buy-in “Y” Do Not Include Medical Expense Deduction on ’59

<table>
<thead>
<tr>
<th>Social Security Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Current Entitlement: 12/02/2012</td>
</tr>
<tr>
<td>Net Monthly Benefit if Payable: $535.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Income Report – Medicare Data: Buy-in “N” Include Medical Expense Deduction on ’59</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicare Data</td>
</tr>
<tr>
<td>----------------</td>
</tr>
<tr>
<td>Date Received by EV: 11-SEP-12</td>
</tr>
</tbody>
</table>
Social Security Deductions & Garnishments
Not Reportable in the EIV System

The following SSA deductions are not included in the Income Report:

- Garnishments (such as child support, alimony, unpaid federal taxes etc.);
- Medicare Part D premiums for prescription drugs.

O/As must request that tenant(s) disclose(s) any deduction(s) he/she may have from their SSA benefits.

NOTE: The tenant may contact the SSA with the owner present at 1.800.772.1213 or access the SSA website at: http://www.socialsecurity.gov.

---

Income Report Example – Jane Smith
SSA Disability Status

Not always accurate; AND Must Not be used to verify tenant’s eligibility as an elderly/disabled household for purposes of the $400 allowance.
Income Report Use for New Admissions (New Move-ins & Households with IC)

- Income Report **must** be reviewed within 90 days after transmission of each Move-In (MI) 50059 and Initial Certification (IC) 50059 to TRACS.
  - Good Business Practice: Re-run and review the Income Report every 30 days until this report populates.

- Income Discrepancies **must** be resolved within 30 days of the print date of the report.

- Retain printed report(s) and documentation of discrepancy resolution in Tenant File for Term of Tenancy, plus 3 years.

Record Retention

- Owners must maintain documentation of all verification efforts throughout the term of each tenancy and for at least three years after the resident moves out.

- Denied applications must be kept for at least three years after the denial.

- The resident’s file should be available for review by the resident upon request or by a third party who provides signed authorization for access from the resident.
Disposal of Files

- Owners must dispose of tenant files and records in a manner that will prevent any unauthorized access to personal information.
HEATHER STAGGS
720-943-8603

Questions?
heather@star-momentum.com

More Information?
www.star-momentum.com