

Attachment 6: Use of EIV Reports

USE OF EIV REPORTS					
REPORT	*UPDATE		REPORT USE	FILE DOCUMENTATION	RETENTION
	TSP	P&P			
<p>Summary Report</p> <p>Summary of household information from the current, active certification in the TRACS file at the time of the income match.</p> <p>Provides Identity Verification Status by identifying tenants whose personal identifiers:</p> <ul style="list-style-type: none"> • Match the SSA database - “Verified” • Does not match the SSA database – “Failed” • Have not been sent by HUD to SSA for validation or have not yet been matched by SSA for validation – “Not Verified” • SSA’s records indicate the person is deceased – “Deceased” <p>See Section VII.A.1</p>		X	<p>Must be used at recertification (annual and interim)</p> <ul style="list-style-type: none"> • To validate a tenant’s SSN • To review and resolve discrepant or invalid personal identifiers of tenants with a “failed” or “deceased” status <p>Note: Nothing has to be done at the time of recertification with those tenants with an Identity Verification Status of “Not Verified”. However, the Failed SSA Identity Test report must be checked monthly as a change in the Identity Verification Status may occur.</p>	<p>Summary Report(s) as verification of the SSN for all household members whose Identity Verification Status is “Verified”.</p> <p>Correspondence or documentation received to resolve a tenant’s “Failed” or “Deceased” status.</p> <p>Documentation for household members identified as exempt from disclosing and providing verification of a SSN:</p> <ul style="list-style-type: none"> • Tenants who were 62 years of age or older as of January 31, 2010 and whose initial determination of eligibility was begun before January 31, 2010; and • Individuals who do not contend eligible immigration status <p>If the Summary Report in the tenant file shows an Identity Verification Status of “Verified” for all household members required to have a SSN, the Owner does not have to continue to print out the Summary Report at recertification unless there is a change in household composition or in a household member’s identity verification status</p>	<p>Tenant file</p> <p>Summary Report and supporting documentation must be retained in the tenant’s file for term of tenancy plus 3 years.</p> <p>Note: O/As may remove and destroy copies of verification documentation received from the tenant to verify their SSN once the Identity Verification Status shows “Verified”. O/As are encouraged to minimize the number of tenant records that contain documents that display the full nine-digit SSN.</p>

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INCOME REPORTS					
Note: A current, signed form HUD-9887 must be on file to view and/or use the income reports.					
A current, signed form HUD-9887-A must be on file to obtain written third party verification of income.					
<p>Income Report</p> <p>Provides employment and income reported by HHS and SSA for each household member that passes the SSA identity test.</p> <p>Identifies tenants who:</p> <ul style="list-style-type: none"> • May not have reported complete and accurate income information • May be receiving multiple subsidies <p>See Section VII.A.2</p>		X	<p>Mandatory use at Recertification - Annual and Interim</p> <p>May be used at other times as indicated in O/A's policies and procedures.</p> <ul style="list-style-type: none"> • Serves as third party verification of employment and income. <p>New Admissions:</p> <ul style="list-style-type: none"> • Review new admissions within 90 days after the move-in information is transmitted to TRACS to confirm/validate the income reported by the household. <p>Resolve discrepancies in reported income with the family within 30 days of the EIV Income Report date.</p>	<p>No Dispute of EIV Information:</p> <ul style="list-style-type: none"> • EIV Income Report • Current, acceptable tenant provided documents • Third party verification from the source, if necessary <p>Disputed EIV Information:</p> <ul style="list-style-type: none"> • EIV Income Report • Third party verification from the source for the disputed information <p>Tenant-reported income not verified through the EIV system:</p> <ul style="list-style-type: none"> • EIV Income Report • Current, acceptable tenant-provided documents, and/or • Third party verification from the source <p>Any correspondence with/from tenant relating to disputes of the employment or income reported in EIV.</p> <p>Form HUD-50059(s)</p>	<p>Tenant File</p> <p>Retain copy of Income Report and supporting documentation with applicable form HUD-50059 for term of tenancy plus 3 years.</p> <p>Note: The O/A must make copies of any tenant provided documents and return the originals to the tenant.</p>

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INCOME REPORTS Cont'd.					
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A current, signed form HUD-9887-A must be on file to obtain written third party verification of income.					
<p>Income Discrepancy Report</p> <p>Identifies households where there is a difference of \$2,400 or more in the wage, unemployment and SSA benefit information reported in EIV and wage, unemployment and SSA benefit information reported in TRACS for the period of income used for discrepancy analysis.</p> <p>The report serves as a tool to alert O/As that there may be a discrepancy in the income reported by the tenant during the period of income used for the discrepancy analysis.</p> <p>See Section VII.A.3</p>		X	<p>Mandatory use at Recertification - Annual and Interim</p> <p>Report may be used at other times as indicated in O/A's policies and procedures.</p> <p>Must print the report at the same time the Income Report is printed.</p> <p>Discrepancies must be reviewed and resolved at the time of recertification or within 30 days of the EIV Income Report date.</p> <p>Review data in TRACS to make sure agrees with the form HUD-50059 data. Correct any discrepant data in the TRACS database.</p>	<p>All correspondence to/from the tenant regarding the income discrepancy.</p> <p>Documentation received to resolve the discrepancy, including written third party verification of income, if applicable.</p> <p>The file must be documented regardless of whether the O/A determines the discrepancy to be valid or invalid.</p> <p>Corrected form HUD-50059(s), if applicable.</p> <p>Repayment Agreement, if applicable.</p>	<p>Tenant file</p> <p>Retain copy of Income Discrepancy Report and any documentation related to the resolution of the discrepancy, including any repayment agreements for term of tenancy plus 3 years.</p>

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Note: A current, signed form HUD-9887 must be on file to view and/or use the income reports.					
A current, signed form HUD-9887-A must be on file to obtain written third party verification of income.					
<p>No Income Report</p> <p>Identifies tenants who passed the SSA identity test but no income was reported by HHS or SSA.</p> <p>This does not mean that the tenant does not have any income. O/A must obtain written third party verification of any income reported by the tenant.</p> <p>Recommend "zero" income tenants be required to disclose and O/A re-verify income at least quarterly. These are tenants who report no income at all.</p> <p>See Section VII.A.4</p>		X	<p>As identified in O/A's policies and procedures. Interview tenants, asking the right questions to provide the tenant the opportunity to disclose any income.</p>	<p>Third party verification from income sources of other income reported by tenant, if applicable.</p> <p>Correspondence/documents received for re-verification of zero income tenants.</p>	<p>Tenant file</p> <p>Any documentation or third party verifications for other income reported by the tenant for term of tenancy plus 3 years.</p>

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Note: A current, signed form HUD-9887 must be on file to view and/or use the income reports.					
A current, signed form HUD-9887-A must be on file to obtain written third party verification of income.					
<p>New Hires Report</p> <p>Identifies tenants who have new employment within the last 6 months. Report is updated monthly.</p> <p>See Section VII.A.5</p>		X	<p>At least quarterly</p> <p>Contact tenant regarding new employment</p> <p>Confirm new employment with tenant. Request tenant provided documents to support current income and/or third party verification from employer, as applicable.</p> <p>Process Interim Recertification to include new income, if applicable.</p>	<p>New Hires Report with notation of action(s) taken.</p> <p>No Dispute of EIV Information:</p> <ul style="list-style-type: none"> EIV Income Report Current, acceptable tenant provided documents Third party verification from the source, if necessary. <p>Disputed EIV Information:</p> <ul style="list-style-type: none"> EIV Income Report Third party verification from the source for disputed information <p>Any correspondence with/from tenant relating to new employment and/or disputes of the employment or income reported in EIV.</p> <p>Form HUD-50059(s)</p>	<p>Master file Retain New Hires Summary Report in a master "New Hires Report" file for 3 years.</p> <p>Tenant file Retain New Hires Detail Report for the tenant along with any correspondence with tenant, third party verifications, form HUD-50059(s), etc., for term of tenancy plus 3 years.</p>

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VERIFICATION REPORTS					
Note: A form HUD-9887 is not required to view and/or use verification reports.					
<p>Existing Tenant Search</p> <p>Identifies applicants who may be receiving assistance at another Multifamily or PIH location.</p> <p>See Section VII.B.2.a</p>	X		<p>At the time of processing an applicant for admission</p> <p>Search each applicant and applicant household member to see if receiving assistance at another location.</p> <p>Discuss with tenant regarding circumstances relative to being assisted at another Multifamily or PIH property.</p> <p>Follow up with respective PHA or O/A to confirm the individual's program participation status before admission.</p> <p>Coordinate move-in/out dates with PHA or O/A.</p>	<p>Search results for each member of the household.</p> <p>Results of any contact with applicant must be recorded on and/or with the search results for affected household member.</p> <p>Results of any contact with PHA, owner, management agent where applicant is reported as receiving assistance must be recorded on and/or with the search results for affected household member.</p>	<p>Application file</p> <p>If not admitted – retain search results and any supporting documentation with the application for 3 years.</p> <p>Tenant file</p> <p>If admitted – retain search results and any supporting documentation with the application for term of tenancy plus 3 years.</p>

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Note: A form HUD-9887 is not required to view and/or use verification reports.					
<p>Multiple Subsidy Report</p> <p>Identifies tenants who may be receiving rental assistance at more than one location.</p> <p>See Section VII.B.2.b</p>		X	<p>At least quarterly</p> <p>Must search both queries:</p> <ul style="list-style-type: none"> • Search within MF • Search within PIH <p>Provide tenant opportunity to explain any circumstances relative to his/her being assisted at another location.</p> <p>Follow up with respective PHA or O/A, if necessary, to confirm tenant is being assisted at the other location. Depending on the results, may need to take action to terminate the assistance or tenancy and repay subsidy to HUD.</p>	<p>Search results</p> <p>Documentation supporting any contacts made or information obtained to determine if household and/or household member is receiving multiple subsidies.</p> <p>Documentation to support any action taken if household and/or household member is receiving multiple subsidies.</p> <p>Note: If a tenant's multiple subsidies were discussed and resolved at the time of recertification, this must be noted on the printed report and no further action is required.</p>	<p>Master file</p> <p>Retain Multiple Subsidy Summary Report and supporting documentation in a master "Multiple Subsidy Report" file for 3 years.</p> <p>Tenant file</p> <p>Retain a copy of the Multiple Subsidy Detail Report for the tenant along with any documentation of action taken for a household member for term of tenancy plus 3 years.</p>

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VERIFICATION REPORTS Cont'd.					
Note: A form HUD-9887 is not required to view and/or use verification reports.					
<p>Failed EIV Pre-screening Report</p> <p>Identifies tenants who have missing or invalid personal identifiers (last name, date of birth, SSN) in TRACS. These tenants will not be sent to SSA from EIV for the SSA identity test.</p> <p>Identifies tenants who need to disclose a SSN, e.g., replace TRACS generated id number.</p> <p>See Section VII.B.2.c.(1)</p>		X	<p>Monthly</p> <p>Follow up with tenants identified on the report where discrepant personal identifiers were not corrected at the time of recertification.</p> <p>Check accuracy of data entry, e.g., numbers not transposed in SSN.</p> <p>Contact tenant and confirm to verify discrepant personal identifiers</p> <p>Correct TRACS data within 30 days of the date of the report.</p>	<p>Failed EIV Pre-screening Report documented with action taken to resolve invalid or discrepant personal identifiers.</p> <p>Note: This report will include those persons who are exempt from the SSN disclosure and verification requirements. In these instances the O/A will note on the copy of the report retained in the "Failed EIV Pre-Screening Report" master file that tenant(s) is exempt from SSN requirements.</p> <p>Note: If a tenant's information was corrected at the time of recertification but the EIV data has not yet been updated, this must be noted on the printed report and no further action is required.</p>	<p>Master file Retain copy of report in a master "Failed EIV Pre-screening Report" file for 3 years.</p> <p>Tenant file Documentation to verify discrepant personal identifiers for term of tenancy plus 3 years.</p>
<p>Failed Verification Report (Failed SSA Identity Test)</p> <p>Identifies tenants whose personal identifiers (last name, date of birth, SSN) do not match the SSA database.</p> <p>See Section VII.B.2.c.(2)</p>		X	<p>Monthly</p> <p>Follow up with tenants identified on the report where discrepant personal identifiers were not corrected at the time of recertification.</p> <p>Check accuracy of data entry, e.g., numbers not transposed in SSN.</p> <p>Contact tenant and confirm to verify discrepant personal identifiers.</p> <p>Correct TRACS data within 30 days of the date of the report.</p>	<p>Failed Verification Report (Failed SSA Identity Test) report documented with action taken to resolve invalid or discrepant personal identifiers</p> <p>Note: If a tenant's information was corrected at the time of recertification but the EIV data has not yet been updated, this must be noted on the printed report and no further action is required.</p>	<p>Master file Retain copy of report in a mater "Failed EIV SSA Identity Test" file for 3 years.</p> <p>Tenant file Documentation to verify discrepant personal identifiers for term of tenancy plus 3 years.</p>

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VERIFICATION REPORTS Cont'd.					
Note: A form HUD-9887 is not required to view and/or use verification reports.					
Deceased Tenants Report Identifies tenants reported by SSA as being deceased. See Section VII.B.2.d		X	At least quarterly Confirm, in writing, with head of household, next of kin or contact person or entity provided by the tenant to determine whether or not the person is deceased. If deceased, within 30 days from date of report: <ul style="list-style-type: none"> Update family composition, and, if applicable, income and allowance, on the form HUD-50059. See Paragraph 7-13D of Handbook 4350.3 REV-1 for effective date. Single member of a household, process move-out using form HUD-50059-A. Effective date retroactive to earlier of 14 days after date of death or date unit vacated. Note: Overpayment of subsidy must be returned to HUD. Any discrepant data in TRACS must be updated within 30 days from the date of the report. Encourage tenant to contact SSA if SSA's data is incorrect.	Deceased Tenants Report Documentation obtained to resolve discrepancy. Form HUD-50059 with change of family composition. Form HUD-50059-A for move-out. Note: If action was taken to remove the deceased tenant from the household or to terminate tenancy of a deceased single member of a household at the time of recertification but the EIV data has not yet been updated, this must be noted on the printed report and no further action is required.	Master file Retain copy of report in a master "Deceased Tenants Report" file for 3 years. Tenant file Form HUD-50059 and/or form HUD-50059-A plus any other documentation received for a particular tenant must be retained for term of tenancy plus 3 years.

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Attachment 7: EIV Income Report Information

- a. TRACS certification information
- b. Personal Identifiers: name, date of birth and SSN
- c. Employment information
 - 1. New Hire Information (W-4)
 - (a) Date hired
 - (b) Employer name
 - 2. Employer name, address and employer identification number (current and past employers)
 - 3. Quarterly earnings
- d. Quarterly unemployment compensation
- e. Social Security benefit information
 - 1. Social Security benefits (SS)
 - (a) Payment status code
 - (b) Date of current entitlement
 - (c) Current net monthly benefit amount (if payable)
 - (d) Gross monthly benefit history (last 8 changes in benefit amount)
 - (e) Lump sum payment amount and date
 - (f) Payee name and address
 - 2. Dual Entitlement (Social Security benefits under another person's SSN)
 - 3. Supplemental Security Income (SSI)
 - (a) Payment status code
 - (b) Alien indicator
 - (c) Current net monthly benefit amount
 - (d) Current monthly state supplement benefit amount
 - (e) Gross monthly benefit history (last 8 changes in benefit amount)
 - (f) Payee name and address
 - 4. Medicare data
 - (a) Payee name and address
 - (b) Monthly hospital insurance premium amount, buy-in status and buy-in start and end dates
 - (c) Monthly supplemental medical insurance premium amount, buy-in status and buy-in start and end dates
 - 5. Disability status and onset date

All EIV Income Reports contain the date the report was generated and by whom and the date EIV received each type of information.

Attachment 8: MOR Findings for EIV Compliance (List is not all inclusive)

What is considered a Management and Occupancy Review (MOR) Finding? (Mandatory EIV Use)	
1.	O/A does not have access to EIV
2.	O/A is not using EIV for recertifications effective June 1, 2010
3.	Missing/incomplete EIV documents as listed on the Addendum C. (Email HUD Headquarters immediately to Terminate the coordinator's/user's access at the following address: mf_alert@hud.gov) <ul style="list-style-type: none"> • Name, property, MOR date and missing documentation • Advise O/A mitigate and contact CA to reinstate access
4.	Rules of Behavior for non-system users missing where applicable
5.	EIV data being shared with other entities, e.g., state officials monitoring tax credit projects, rural Housing staff monitoring Section 515 projects, or Service Coordinators
6.	EIV data not kept secure
7.	O/A has not updated Policies and Procedures to include EIV use
8.	O/A has not updated Tenant Selection Plan to include use of Existing Tenant Search
9.	EIV Income Reports are not in tenant files as third party verification
10.	Tenant files do not have documentation to support EIV income discrepancy resolution
11.	O/A is not using Existing Tenant Search
12.	O/A is not reviewing New Hires Report
13.	Unresolved Failed Verification (SSA Identity Test) and Pre-screening discrepancies
14.	Deceased Tenants Report has not been reviewed and/or errors corrected
15.	Multiple Subsidy Report has not been reviewed and/or errors corrected
16.	O/A is not following HUD's record retention requirements
17.	Missing/Incomplete form HUD-9887
18.	O/A is not providing tenants with the <i>EIV & You</i> brochure when selected from waiting list to move-in and at annual recertification
19.	Individuals having access to the EIV system or data had annual security training
20.	O/A is sharing access Ids and passwords