

ENTERPRISE INCOME VERIFICATION (EIV) SECURITY AWARENESS TRAINING QUESTIONNAIRES FOR MULTIFAMILY HOUSING PROGRAMS

Background

EIV contains personal information that is covered by the Privacy Act such as Social Security Numbers (SSNs), Social Security (SS)/Supplemental Security Income (SSI) benefit, wage, unemployment compensation, and new hire (W-4) information concerning persons participating in HUD-subsidized programs. Therefore, the Department strongly encourages new and existing EIV users to have security awareness training, at least annually, as a crucial aspect of ensuring the security of the EIV system and the data contained in the system. The Department's Office of Multifamily Housing Programs provided security awareness training in June 2007 and intends to provide another such training in July 2008 via satellite broadcast (See EIV Training and Outreach for Multifamily Housing Programs web page). This Office has also developed security awareness training questionnaires for EIV user applicants: one for EIV User applicants and one for EIV Coordinator applicants. To reinforce the importance of respecting the privacy of data, users are strongly encouraged to also conduct security awareness training, onsite, at least annually.

Instructions

A. <u>Complete and sign</u>.

The appropriate questionnaire should be completed by all <u>new</u> EIV user applicants (Coordinators and Users) applying for initial access, meaning the applicant is requesting EIV access for the first time and does not have access to EIV for any contract(s) and/or property(ies) in his or her portfolio in Web Access Secure Systems (WASS), and at least annually by <u>existing</u> EIV user applicants applying for re-certification of EIV access, meaning the applicant has a contract(s) or property(ies) that is currently "Certified" in EIV, but needs to be re-certified in EIV by a certain date to avoid expiration.

Please note that completion of the appropriate questionnaire is completely voluntary. However, HUD's Multifamily Helpdesk cannot approve EIV Coordinator applicants, whether for new or re-certification of existing access, who do not complete and sign the appropriate security awareness training questionnaire; and, approved EIV Coordinators cannot approve EIV User applicants, whether for new or re-certification of existing access, who do not complete and sign the appropriate questionnaire.

B. <u>Certify</u>.

As confirmation of completion, <u>new</u> applicants for EIV Coordinator access must certify on the Coordinator Access Authorization Form (CAAF) to the completion of the **Security Awareness Training Questionnaire for EIV Coordinators**. In the case of <u>new</u> applicants for EIV User access, these applicants must certify on the User Access Authorization Form (UAAF) to the completion of the **Security Awareness Training Questionnaire for EIV Users**. EIV Coordinator and User applicants applying for re-certification of <u>existing</u> EIV access are asked to certify, within EIV, to the completion of the applicable questionnaire in order to be re-certified for EIV access.

<u>Please note that certification to the completion of the appropriate questionnaire</u> is completely voluntary. However, HUD's Multifamily Helpdesk cannot approve EIV <u>Coordinator applicants</u>, whether for new or re-certification of existing access, who do not certify to the completion of the appropriate security awareness training questionnaire; and, approved EIV Coordinators cannot approve EIV User applicants, whether for new or re-certification of existing access, who do not certify to the completion of the appropriate questionnaire.

C. <u>Maintain for Review</u>.

Whether approved for <u>new</u> or re-certification of <u>existing</u> access, EIV Coordinators and Users must maintain the appropriate questionnaire on file and make it available for review, upon request, during a Management and Occupancy Review (MOR) or audit. If not presented upon request, the EIV Coordinator's and/or User's access will be terminated until such time as the appropriate completed and signed questionnaire can be presented to the reviewer or auditor.

Thank you, in advance, for your cooperation in helping HUD to ensure the integrity of HUD's EIV data and secure system. Following are the subject questionnaires for completion.



Security Awareness Training Questionnaire for EIV Coordinators

Please print clearly. For items with an asterisk (*), complete the one that applies to you.

Name:	Date:
* Name of Owner of Multifamily Housing Property	
* Name of Management Agent	
* Name of Contract Administrator	
* Name of Service Bureau	
Position Title	
Telephone Number	_

Advisory: For existing EIV Coordinator applicants, the Security Awareness Training Questionnaire for EIV Coordinators needs to be completed annually; for new EIV Coordinator applicants, the Security Awareness Training Questionnaire for EIV Coordinators needs to be completed at the time of application for EIV access and annually thereafter at the time of application for recertification. The questionnaire must be maintained on file, along with the Coordinator's approved Coordinator Access Authorization Form (CAAF) and owner and/or authorizing CA letter(s) of approval. These documents must be made available for HUD or CA review during an annual Management and Occupancy Review (MOR) or audit.

	Security Awareness Training Questionnaire for EIV Coordinators	
	QUESTION	Answer
1	Is a Management Agent's or Service Bureau's authorization to represent the owner as Web Access Secure System (WASS) Coordinator sufficient authorization for EIV access? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf</u>	Yes or No?
2	Are Management Agents and Service Bureaus permitted to submit a CAAF to HUD's Multifamily Helpdesk for approval <u>prior</u> to receiving written EIV-specific approval from the Owner? See Instructions for Applying for EIV Access for Multifamily Housing Programs at:	Yes or No?

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	http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	
3	Are approved EIV Coordinators allowed to assign EIV Coordinator access authorization rights to other persons, onsite or otherwise, in need of EIV Coordinator access authorization? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	Yes or No?
4	Can multiple users share one WASS ID for the agency or property? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	Yes or No?
5	If the answer to the above question is "No," are there any circumstances under which multiple users are permitted to share one WASS ID for the agency or property? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	If "Yes," please explain; Otherwise, state "No"
6	Can the income data contained in EIV be shared with staff at other government agencies, for example, State agencies that administer the Temporary Assistance for Needy Families (TANF)? See page 10 of the Security EIV Training presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u>	Yes or No?
7	For what purpose(s) can the EIV data be used? See page 9 of the EIV Security Training presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u>	
8	Can Owners and Agents (O/As) view the data in EIV without having a valid form HUD-9887 on file for the tenant? If not applicable, indicate "N/A." See Legal Warning Page in EIV, page 15 of the EIV Security Training Presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u> , or page 5-5 of the EIV User Manual for 8.1 at: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf</u> .	Yes, No, or N/A?
9	Must Contract Administrators (CAs) verify during an MOR that the O/A has a valid from HUD-9887 on file for tenants? If not applicable, indicate "N/A." See Legal Warning Page in EIV, page 10 of the EIV Security Training Presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u> , or page 5-5 of the EIV User Manual for 8.1 at: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf</u>	Yes, No, or N/A?
10	What are the penalties for unauthorized disclosure and unauthorized inspection of EIV data? See CAAF, page 12 of the EIV Security Training Presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u> , or Legal Warning page in EIV.	

11	What are the three minimum safeguards that should be taken to protect the data contained in EIV? See the EIV System Security Measures web page at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/security.cfm	
12	Should EIV income reports be left in an Office or on a desk in open view and/or unattended at any time? See CAAF or page 6 of the EIV Security Training Presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u> .	Yes or No?

EIV Coordinator Applicant

Signature

Date



Security Awareness Training Questionnaire for EIV Users

Please print clearly. For stared items with an asterisk (*(, complete the one that applies to you.

Name (First, Last):	Date:	
* Name of Owner of Multifamily Housing Property _		
* Name of Management Agent		
* Name of Contract Administrator		
* Name of Service Bureau		
Position Title		
Telephone Number		

Advisory: For existing EIV User applicants, the Security Awareness Training Questionnaire for EIV Users needs to be completed annually; for new EIV User applicants, the Security Awareness Training Questionnaire for EIV Users needs to be completed at the time of application for EIV access and annually thereafter. The questionnaire must be maintained on file, along with the User's approved User Access Authorization Form (UAAF). These documents must be made available for HUD or CA review during an annual Management and Occupancy Review (MOR) or audit.

	Security Awareness Training Questionnaire for EIV Users	
	Question	Answer
1	Can multiple users share one WASS ID for the agency or property? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	Yes or No?
2	If the answer to the above question is "No," are there any circumstances under which multiple users are permitted to share one WASS ID for the agency or property? See Instructions for Applying for EIV Access for Multifamily Housing Programs at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/applyforeivaccess.pdf	If "Yes," please explain; Otherwise, state "No"

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3	Under what circumstance(s) can a user reveal or allow use of his or her password by another person? See User Agreement in the UAAF.	
4	Can the income data contained in EIV be shared with staff at other government agencies, for example, State agencies that administer the Temporary Assistance for Needy Families (TANF)? See page 10 of the Security EIV Training presentation: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf	Yes or No?
5	For what purpose(s) can the EIV data be used? See page 9 of the EIV Security Training presentation: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf	
6	Can Owners and Agents (O/As) view the data in EIV without having a valid form HUD-9887 on file for the tenant? If not applicable, indicate "N/A." See Legal Warning Page in EIV, page 15 of the EIV Security Training Presentation: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf, or page 5-5 of the EIV User Manual for 8.0 at: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf.	Yes, No, or N/A?
8	Must Contract Administrators (CAs) verify during an MOR that the O/A has a valid from HUD-9887 on file for tenants? If not applicable, indicate "N/A." See Legal Warning Page in EIV, page 10 of the EIV Security Training Presentation: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf</u> , or page 5- 5 of the EIV User Manual for 8.0 at: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf</u>	Yes, No, or N/A?
8	What are the penalties for unauthorized disclosure and unauthorized inspection of EIV data? See CAAF, page 12 of the EIV Security Training Presentation: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf, or Legal Warning page in EIV.	
9	What are the three minimum safeguards that should be taken to protect the data contained in EIV? See the EIV System Security Measures web page at: <u>http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/security.cfm</u>	
10	Should EIV income reports be left in an Office or on a desk in open view and/or unattended at any time? See UAAF or page 6 of the EIV Security Training Presentation: http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/wc/security.pdf.	Yes or No?

11	Who will be held accountable for his or her (or their) actions while accessing the system? See Rules of Behavior in the UAAF.	

EIV User Applicant

Signature

Date