

# Social Security Numbers, EIV, and Tenant File Reviews During MORs

North Tampa Housing Development Corporation

**July 20, 2010**  
**Owner/Agent Workshop**  
**Tampa, FL**



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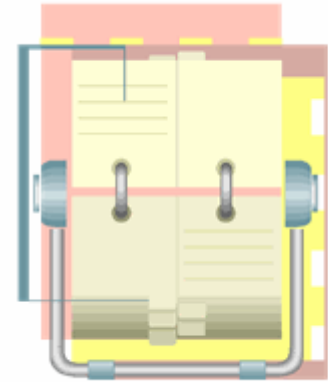
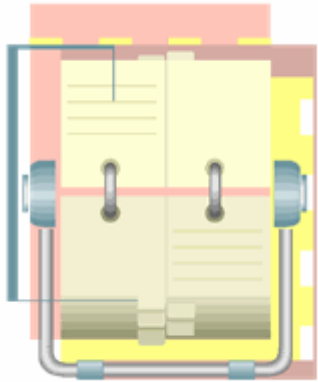
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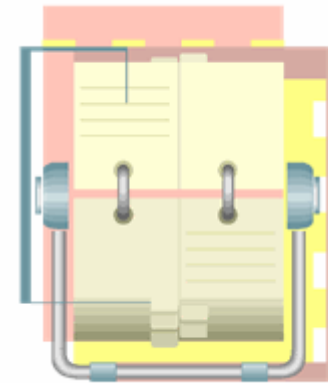
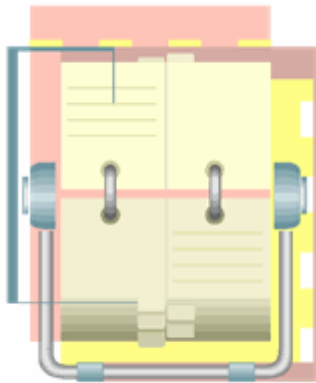
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# Session Agenda

## **Social Security Numbers during MORs**

- Revised Regulations Overview
- What Will be Reviewed During an MOR



# Session Agenda

## EIV Review During MORs

- EIV Requirements Overview
- What Will be Reviewed During an MOR
- Possible EIV Findings
- Penalties for Not Using EIV



# Session Agenda

## Tenant File Reviews During MORs

- Section E-19 of the Form HUD-9834
- Addendum A of the Form HUD-9834
- What are we looking for in the tenant file



# Social Security Numbers

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# Revised Regulation Overview

## **New Social Security Number Requirements Became Effective on 1/31/2010**

- Federal Register, Final Rule on Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification System—Amendments
  - Revised 24 CFR 5.216 and 24 CFR 5.218
  - Available at:  
<http://edocket.access.gpo.gov/2009/pdf/E9-30720.pdf>





# Revised Regulation Overview

- HUD Notice H 2010-08 dated 4/13/2010
  - Provides additional guidance on the new requirements
  - Available at:  
[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)
- 4/14/2010 webcast regarding the implementation of the Final Rule
  - Provides additional guidance on the new requirements
  - Available at:  
<http://portal.hud.gov/portal/page/portal/HUD/webcasts/archives/multifamily>



# What Will Be Reviewed During MOR

## Tenant Selection Plan

- SSN requirements must be updated to incorporate the revised regulations
- Looking for:
  - Requirements to be changed from 6 and older to ALL members must provide SSN prior to move in
  - The 2 exceptions to this requirement to be listed
  - Waiting list procedures to be updated to include process of “skipping” applicants and removing them 90 days after the 1<sup>st</sup> offer of a unit if unable to provide SSN documentation for all non-exempt members

# What Will Be Reviewed During MOR

## Waiting List

- Revised waiting list procedures to be implemented
- Looking for:
  - Applicants to be placed on the waiting list
  - Applicants to be skipped if needed and proper notations made on the waiting list
  - Applicants to be provided 90 days after the 1<sup>st</sup> offer of a unit to provide SSN documentation for all non-exempt members or be are being removed (with proper written notice)
  - Exceptions to be correctly applied



# What Will Be Reviewed During MOR

## Tenant Files

- **Move-ins Since 1/31/2010**
- Looking for:
  - Verification of SSN for all non-exempt members regardless of age
  - Verification/Documentation that any exempt members meet the criteria to be exempt
  - SSN for each non-exempt member to be correctly listed on the 50059



# What Will Be Reviewed During MOR

## Tenant Files

- **Move-ins Prior to 1/31/2010**
- Looking for:
  - Verification of SSN at the next IR or AR that occurred after 1/31/10 for any existing non-exempt member that:
    - Has not previously disclosed a SSN (regardless of age)
    - Has previously disclosed a SSN that HUD or the SSA determined was invalid (management must notify tenant)
    - Has been issued a new SSN



# What Will Be Reviewed During MOR

- Verification/Documentation that all exempt members meet the criteria to be exempt at the next IR or AR that occurred after 1/31/10
- Documentation that tenants were properly notified of the SSN requirements
- SSN for each non-exempt member to be correctly listed on the 50059
- Documentation terminations of tenancy have been initiated for any household that failed to provide required documentation by the required deadlines
- Documentation that when 90 day deferrals were granted they were only given for appropriate situations



# What Will Be Reviewed During MOR

## Tenant Files

- **New Additions to the Household After 1/31/2010**
- Looking for:
  - Verification of SSN for all new non-exempt members over the age of 6; and for new members under the age of 6 that already have a SSN
  - Verification/Documentation that any exempt members added meet the criteria to be exempt
  - SSN for each non-exempt member to be correctly listed on the IR 50059 processed to add the member



# What Will Be Reviewed During MOR

- Documentation in the file for any new member added under the age of 6 without a SSN that:
  - Household has been notified they have 90 days in which to provide verification of a SSN for the child
  - Household has been notified additional 90-day period was granted after 1<sup>st</sup> 90 days only if failure to provide documentation of a SSN was due to circumstances that are outside their control
  - Child is included as part of the household receiving benefits of the program including the dependent deduction during grace periods





# What Will Be Reviewed During MOR

- Documentation terminations of tenancy have been initiated if household failed to provide required documentation by the required deadlines
- Documentation that when 90 day deferrals were granted they were only given for appropriate situations
- IR 50059 was processed to include the correct SSN for the under age 6 member once verification was received



# EIV

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# EIV Requirements Overview

## **EIV Became Mandatory on 1/31/2010**

- Federal Register, Final Rule on Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification System—Amendments
  - Requires EIV be implemented in its entirety
  - Available at:  
<http://edocket.access.gpo.gov/2009/pdf/E9-30720.pdf>



# EIV Requirements Overview

## **Owner/Agents are required to:**

- Have access to EIV
- Maintain all required EIV forms documents
- Use all income & verification reports available in EIV
- Update Policies and Procedures to include the use & frequency of reports in EIV
- Establish Policies and Procedures to maintain and continue to maintain EIV data in accordance with the security safeguards of Privacy Act Data within EIV



# What Will Be Reviewed During MOR

## **LCS Conducting the MOR Will Review:**

- Owner/Agent Access to EIV
- EIV Forms and Documents
- EIV Policies and Procedures
- Tenant Selection Plan
- Tenant Files
- EIV Income and Verification Reports and All Discrepancy Follow Up Documentation
- Secured Environment of EIV Data



# What Will Be Reviewed During MOR

## Owner/Agent Access to EIV

- Has the Owner/Agent established access
- Who has access to EIV
  - Who are the Users
  - Who is the Coordinator
  - Who is not a User or Coordinator but has access to the EIV data



# What Will Be Reviewed During MOR

## EIV Forms and Documents

**\*IMPORTANT NOTE:** EIV Forms must be available for review during the MOR. If one or more forms are not available for review during the MOR, HUD **must** be notified and EIV access will be terminated until the required forms are provided\*



# What Will Be Reviewed During MOR

## EIV Forms and Documents

- Owner Approval Letter(s)
- CAAF(s)- Coordinator Access Authorization Form
  - Initial hardcopy Approved (HUD signed) CAAF
  - Current CAAF

**\* IMPORTANT NOTE: Must have the initial approved (HUD signed) CAAF.** Any Coordinator that does not have the original HUD signed approved CAAF form needs to contact the EIV helpdesk and request a copy of it regardless of when the initial form was approved.\*



# What Will Be Reviewed During MOR

- UAAF(s)-User Access Authorization Form
  - Initial hardcopy Approved (signed) UAAF
  - Current form
- Rules Of Behavior Forms
  - For all individuals without access to the EIV system but access to the EIV data. This includes service bureaus and IPA's.

**\* Important Note:** Owner/Agents do not obtain a Rules of Behavior Form from MOR reviewers. PBCA's were required to have their employees sign this form and are responsible for maintaining it.



# What Will Be Reviewed During MOR

## EIV Policies and Procedures

Written Procedures must include:

- How to use EIV employment and income data and EIV verification reports at the time of each AR, IR and IC
  - Running reports; following up on discrepancies; how/where to maintain the data
- How and when to use each of the Income Reports and each of the Verification Reports
  - Running reports; following up on discrepancies; how/where to maintain the data
  - The frequency for each report must be outlined
    - (Monthly, Quarterly etc...)



# What Will be Reviewed During MOR

- Security Procedures that will maintain safeguards designed to prevent unauthorized use of the EIV information and protect the confidentiality of that information
- Information on Security can be found at:
  - EIV System Security Measures posted at:  
<http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/security.cfm>
  - Section XII of HUD Notice H2010-10 posted at:  
[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)



# What Will be Reviewed During MOR

## Tenant Selection Plan

- Must be updated to include:
  - Use of the EIV Existing Tenant Search as a part of the applicant screening process



# What Will be Reviewed During MOR

## Tenant Files

- 9887/9887A for each adult household member
- EIV and You Brochure during screening process and at each AR
- Income Reports for each AR, IR, and IC
- Discrepancy Reports for each AR, IR and IC
- Documentation of follow up on all unreported/underreported income and supporting documentation of all discrepancy resolutions
- Documentation of termination and/or steps taken for fraud



# What Will be Reviewed During MOR

## **EIV Income and Verification Reports & All Discrepancy Follow Up Documentation**

- LCS will be looking to ensure that each of the EIV Income Reports and Verification Reports available in EIV are being generated at the required times, printed, reviewed, discrepancies followed up on and resolved, and documentation maintained in accordance with both HUD regulations and Owner/Agent established written procedures.



# What Will be Reviewed During MOR

- Summary; Income; and Discrepancy Reports
  - Required to be printed, reviewed, followed up on, and maintained for each AR, IR, and IC; and at times other than recertification if so outlined in the policies and procedures
  - Looking for:
    - Documentation they are printed, reviewed, and followed up on at the frequency outlined in the policies and procedures
    - Reports and all follow up documentation to be maintained in tenant files for term of tenancy and 3 years after MO



# What Will be Reviewed During MOR

Follow up documentation (if discrepancy and/or unreported/underreported income is found) includes:

- Notice to the tenant and all related correspondence
- 3<sup>rd</sup> party verifications
- Additional tenant provided documents
- File notes
- Documentation of resolution even if there is no discrepancy or unreported/underreported income
  - Corrected 50059s and/or additional retroactive 50059 as necessary
  - Documentation of tenant repayment or copy of repayment agreement
  - Voucher adjustments
  - Additional file notes





# What Will be Reviewed During MOR

## No Income Report

- Required to be reviewed and followed up on as outlined in the owner/agent policies and procedures (HUD recommends using this report quarterly for all no income tenants)
  - Looking for:
    - Documentation they are reviewed and followed up on at the frequency outlined in the policies and procedures by having applicable follow up documentation maintained in tenant files for term of tenancy and 3 years after MO



# What Will be Reviewed During MOR

## New Hire; Multiple Subsidy; and Deceased Tenant Reports

- Required to be printed, reviewed, and followed up on no less than quarterly
  - Looking for:
    - Documentation they are printed, reviewed, and followed up on at the frequency outlined in the policies and procedures
    - Summary Reports to be maintained in a Master file for 3 years
    - Detail Reports and all follow up documentation to be maintained in tenant files for term of tenancy and 3 years after MO



# What Will be Reviewed During MOR

## Identity Reports (Failed EIV Pre-screening & Failed Verification Reports)

- Required to be printed, reviewed, and followed up on Monthly
  - Looking for:
    - Documentation they are printed, reviewed, and followed up on Monthly
    - Reports to be maintained in a Master file for 3 years
    - All follow up documentation to be maintained in tenant files for term of tenancy and 3 years after MO



# What Will be Reviewed During MOR

## Existing Tenant Search Report

- Required to be printed, reviewed, and followed up on for each household member during the application process
  - Looking for:
    - Documentation they are printed, reviewed, and followed prior to move-in
    - Reports and all follow up documentation to be maintained in tenant files for term of tenancy and 3 years after MO; or with the application for 3 years after removal from waiting list





# What Will be Reviewed During MOR

## Secured Environment of EIV Data

Looking for:

- File storage area to see if the area is secure with access limited to only authorized staff
  - Do filing cabinets lock
  - Does door to filing area lock
  - Who has keys
- Evidence that security procedures, retention policies, and disposal methods followed consistently
  - How EIV reports are generated/printed and how/where they are maintained

# What Will be Reviewed During MOR

- Who is accessing EIV system and from where
- Are staff sharing access IDs and passwords
- Is EIV data being shared with other entities not authorized to view EIV data (e.g., state officials monitoring tax credit projects, Rural Housing staff monitoring Section 515 projects, or Service Coordinators)

**NOTE:** Disclosure of EIV data to Service Coordinators even though the tenant signs a release of information consent form authorizing them to have access to their file is not allowed unless the Service Coordinator is present during the interview and assisting the tenant with the recertification process.



# What Will be Reviewed During MOR

## Preparing for your MOR

EIV is now mandatory so all Owner/Agents should already have access in EIV for each property with current approved coordinators and users; be using EIV in its entirety (using all of the EIV reports); have written procedures in place; and should have provided training for staff on how to use EIV and maintain the security of the data. If you have not done one or more of these items, take the necessary steps to do so immediately prior to your next MOR.



# Possible EIV Findings

1. O/A does not have access to EIV
2. O/A is not using EIV for recertification
3. Missing/incomplete EIV documents as listed on the Addendum C. (must also email HUD Headquarters immediately to terminate the coordinator's/ user's 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





# Possible EIV Findings

8. O/A has not updated Tenant Selection Plan to include of Existing Tenant Report
9. EIV Income Reports are not in tenant files
10. Tenant files that do not have documentation to support EIV discrepancy resolution
11. Not Using the Existing Tenant Search Report
12. Not reviewing New Hires Report
13. Unresolved Failed Verification and Pre-screening Discrepancies
14. Deceased Tenant Report has not been reviewed and/or errors corrected
15. Multiple Subsidy Report has not been reviewed and/or errors corrected

# Possible EIV Findings

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 EIV & You brochure when selected from the waiting list for move in and at AR
19. Not completing Annual Security Awareness Training
20. O/A is sharing access IDs and passwords

# Penalties For Not Using EIV

If during an MOR it is determined Owner/ Agent:

- Does not have access to EIV or is not using EIV
- Did not submit its CAAF to the Multifamily Help Desk by December 15, 2009; and/or
- Did not complete the property assignment process by January 15, 2010
  - A 5% voucher penalty will will be required
  - Owner/Agent must make an adjustment on its next scheduled voucher to adjust for the 5% decrease
  - NTHDC must monitor the Owner/Agent to ensure the adjustment is made



# EIV Guidance

EIV HUD NOTICE: H 2010-10 Issued 7/1/2010 is available at:  
[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)

December 2009 HUD EIV webcast 12/29/2009 is available at:  
<http://portal.hud.gov/portal/page/portal/HUD/webcasts/archives/multifamily>

EIV: Instructional Course for Multifamily Housing Programs, February 25, 2010 is available at:  
<http://portal.hud.gov/portal/page/portal/HUD/webcasts/archives/multifamily>

EIV User Manual for Multifamily Housing Program Users is available at:  
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf>



# EIV Guidance

Multifamily Housing EIV web site:

<http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/eivhome.cfm>

EIV Multifamily Help Desk Telephone: 202-708-7588

Email: [Mf\\_Eiv@hud.gov](mailto:Mf_Eiv@hud.gov)

**Questions should be sent via email to:**

[mf\\_eiv\\_comments@hud.gov](mailto:mf_eiv_comments@hud.gov)

Resolving Income Discrepancies Between Enterprise Income Verification (EIV) System Data and Tenant-Provided Income Information”

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/reqnguide.cfm>



# EIV Guidance

Rent and Income Determination Quality Control Monitoring Guide for Multifamily Housing Programs

<http://www.hud.gov/offices/hsg/mfh/rhiip/qcguide.pdf>

EIV & and You Brochure HUD NOTICE: H 2010-02 Issued 1/11/2010 is available at:

[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)

New EIV & You Brochure is available at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eivbrochure.pdf>

New Rules of Behavior Acknowledgement form is available at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>



# EIV Guidance

Tenants who need to request a current Award Letter may request a new letter from SSA by calling 1-800-772-1213 (TTY 1-800-325-0778) or by requesting it over the internet at: <https://secure.ssa.gov/apps6z/iss/main.html>.

**NOTE:** On 4/14/2010 HUD conducted a webcast regarding the implementation of the Final Rule and also released a Notice regarding implementation EIV HUD NOTICE: H 2010-08 dated 4/13/2010 is available at:

[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)

And this webcast is available at:

<http://portal.hud.gov/portal/page/portal/HUD/webcasts/archives/multifamily>



# Tenant File Review

North Tampa Housing Development Corporation





# Section E-19 of the Form HUD-9834

## Section E-19 of the Form HUD-9834

- Form HUD-9834 is the form used to conduct MORs
- Section E is the Leasing and Occupancy section of the Form HUD-9834
- 19 is the Summary of Tenant File Review part of Section E
- E-19 is completed after the file reviews are conducted using the Addendum A
- Form HUD-9834 is available at:

<http://www.hud.gov/offices/adm/hudclips/forms/hud9a.cfm#group4>



# Section E-19 of the Form HUD-9834

## Section E-19

- E-19 consists of 8 parts (a. – h.)
  - a. Tenant Files and Records
  - b. Application/Tenant Selection
  - c. Lease
  - d. Certification/Re-Certification Activities
  - e. Voucher Billing
  - f. Move-In Files
  - g. Move-Out Files
  - h. Application Rejection Files



# Section E-19 of the Form HUD-9834

<b>19. Summary of Tenant File Review</b>	
<p>This section applies only to subsidized projects and should be completed after the tenant file reviews (See Addendum A.) <b>The minimum file sample should include review of files for new move-ins, recertifications, at least one Reject Applicant file, and at least one Terminated/Move-out Tenant file.</b> In order to review specific functions (utility reimbursement, pet rules/deposits, minimum rents, etc.) it may be necessary to target a portion of the files reviewed to specific tenant families. The reviewer should adjust the tenant file sample to meet the needs of the review.</p>	
<i>Number of Units</i>	<i>Minimum File Sample</i>
100 or fewer	5 files plus 1 for each 10 units over 50
101-600	10 files plus 1 for each 50 units or part of 50 over 100
601-2000	20 files plus 1 for each 100 units or part of 100 over 600
Over 2000	34 files plus 1 for each 200 units or part of 200 over 2,200
<p>For each question, only answer "Yes" if the files reviewed are acceptable. Answer "No" if the files are not acceptable and note the number of files with deficiencies utilizing the tenant file worksheet, Addendum A</p> <p><b>(Please note: There is no maximum number of files to be sampled)</b></p>	<p><b>Number of Files Reviewed =</b> <input style="width: 50px; height: 20px;" type="text"/></p>



# Section E-19 of the Form HUD-9834

## a. Tenant Files and Records

- i. Are the tenant files organized and properly maintained?
- ii. Do the files contain all documentation as required in Handbook 4350.3 REV-1? (At right, indicate the documents missing in the file.)



# Section E-19 of the Form HUD-9834

## **b. Application/Tenant Selection**

- i. Were the applications in the files signed and dated by applicant?
- ii. Was screening conducted in accordance with the Tenant Selection Plan?
- iii. Were the unit sizes appropriate for household composition at the time of this tenant file review?
- iv. If a household was ineligible at move in, were exceptions granted?



# Section E-19 of the Form HUD-9834

## c. Lease

- i. Were the correct model leases used?
- ii. Were the leases signed and dated by all required parties?
- iii. Were the applicable attachments attached to the lease?
- iv. Were security deposits collected in the correct amount for the program?
- v. Were pet deposits within acceptable range and payment installments allowed?



# Section E-19 of the Form HUD-9834

## **d. Certification/Re-Certification Activities**

- i. Were re-certification notices issued in accordance with HUD requirements?
- ii. Were certifications completed on time?
- iii. Were all necessary verifications completed and properly documented?
- iv. Were income and deductions calculated correctly prior to data entry?
- v. Did income information on the tenant certifications agree with verified file information?



# Section E-19 of the Form HUD-9834

- vi. If tenants were granted a hardship exemption as part of the minimum rent, was the exemption applied correctly?
- vii. Were notices provided to tenants when their portion of rent increased in accordance with HUD tenant notification requirements?
- viii. Were the correct contract rents used for determining subsidy paid on behalf of tenants?



# Section E-19 of the Form HUD-9834

- ix. If tenants are paying their own utilities, were the current certifications reflecting the correct utility allowances?
- x. Were utility reimbursement checks distributed within 5 business days of receipt of the housing assistance payments?

# Section E-19 of the Form HUD-9834

## e. Voucher Billing

- i. Were there any deficiencies noted in the tenant file review that resulted in over payment or under payment of subsidy?
- ii. For the move-in/ move-out tenant file review, did the owner/agent make the appropriate voucher adjustments?



# Section E-19 of the Form HUD-9834

## f. Move-In Files

- i. Were proper income limits used for determining eligibility at move-in?
- ii. Did the files contain move-in inspections?
- iii. If the files contained move-in inspections, did the owner/agent and tenant sign and date?



# Section E-19 of the Form HUD-9834

## **g. Move-Out Files**

- i. Did tenants provide written notice of intent to vacate in accordance with the HUD model lease?
- ii. Were move-out inspections conducted?
- iii. Were security deposits refunded in 30 days or less if required by state law?
- iv. Were tenants provided an itemized listing of charges against the security deposits?
- v. If charges exceeded the security deposits, were the tenants billed for the balances?



# Section E-19 of the Form HUD-9834

## **h. Application Rejection Files**

- i. Were applicants denied admittance in accordance with the Tenant Selection Plan?
- ii. Did rejection letters provide applicants the right to appeal?
- iii. If applicants appealed application rejections, were appeals reviewed by someone other than person who made the original decision?
- iv. Were appeals processed and applicants notified of appeal decision within 5 days of meeting?



# Addendum A of the Form HUD-9834

## Addendum A

- Addendum A is an attachment to the Form HUD-9834
- Addendum A is a checklist that is used when conducting the tenant file review on site
- 1 Addendum A is filled out for each certification (MI, MO, IR, IC) reviewed as well as for each application rejection reviewed.



**Tenant File Review Worksheet**

**Instructions:** Review the appropriate number of tenant files and complete this worksheet for each file reviewed. Indicate the initial move-in date in the appropriate box. Indicate by marking the appropriate box (Yes, No, or N/A) for each document available in the tenant file. For move-out and applicant rejections files, reviewer should only complete the pertinent sections.

Name of Reviewer: \_\_\_\_\_

Type of Review:  
 Applicant Rejection    Tenant Move-In    Tenant Move-Out    Certification/Recertification

Effective date of certification(s) reviewed: \_\_\_\_\_

If Certification/Recertification, indicate certification type:  
 Certification Type:    Initial    Annual    Interim    Other

Family Name: _____	Unit Number: _____	Move-in Date: _____
Bedroom Size: <input type="checkbox"/> 0 Bedroom <input type="checkbox"/> 1 Bedroom <input type="checkbox"/> 2 Bedroom <input type="checkbox"/> 3 Bedroom <input type="checkbox"/> 4 Bedroom <input type="checkbox"/> 5 or more Bedrooms		

A. HOUSEHOLD INFORMATION		
1. Is the application complete, including the date and time received by the owner/agent?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
2. Are the household members identified correctly? (head, spouse, dependent, co-head, other adult(s), live-in aide)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
3. Is the unit size appropriate for household?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
4. Was household income eligible at move-in? (This question applies only to a tenant file move-in review.)	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____  Over income? <input type="checkbox"/> Low income? <input type="checkbox"/> Very low income? <input type="checkbox"/> Extremely low income? <input type="checkbox"/>
5. If household was not income eligible at move-in, was an exception granted?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
6. Is the lead-based paint acknowledgement in the file?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments: _____
7. Does the file contain the ethnicity and racial Data Certification as provided to the owner/agent?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
8. Have the HUD-9887/9887-A Consent Forms been signed by head, spouse, co-head regardless of age and family members at least 18 years of age?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
9. Was the HUD-9887 Fact Sheet provided to the tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____
10. Does the file contain the Resident Rights and Responsibilities acknowledgement?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments: _____



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<b>B. VERIFICATION</b>		
Have the following items been properly verified and documented?		
1. Social security numbers for all family members at least 6 years of age and older or certification, if no SSN	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
2. Eligible immigrant status or citizenship	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
3. Criminal and drug screening; sex offender registration	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
4. Other screening as disclosed in Tenant Selection Plan	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
5. Disability	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
6. Student status	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
7. Age	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
8. Did the household certify whether or not they disposed of assets during the past two years?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
<b>C. LEASE</b>		
1. Is the correct HUD modal lease used?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
2. Is the original lease and subsequent leases or addendums signed by the owner/agent, head, spouse, co-head, and all other adult members of the household?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
3. Are applicable attachments attached to the lease, e.g., house rules, pet rules, unit inspection report?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
4. If security deposit is required, was it correct? If required, enter amount here:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
5. If pet deposit required, was it correct? If required, enter amount here:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
6. If pet deposit was paid in installments, was payment in accordance with the pet regulations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
7. Is the move-in inspection dated and signed by tenant and owner/agent?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
8. Are Annual inspections documented in file?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
<b>D. CERTIFICATION/RECERTIFICATION ACTIVITIES</b>		
1. Were recertification notices provided within the required timeframes?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
2. Were recertifications completed on time?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
3. Is the certification signed and dated by the appropriate parties?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:





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All reported income and deductions verified and calculated correctly?	3 <sup>rd</sup> Party Verification?	Amount Reported on 50059	Did income information on the 50059 agree with verified file information? If no, comment on discrepancies identified
4. Wages	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
5. Social Security Benefits	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
6. Welfare/Public Assistance/TANF	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
7. Other income	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
8. Actual Income from Assets	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
9. Imputed income when assets are greater than \$5,000	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
10. Dependent Allowance	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
11. Medical Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
12. Disability Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
13. Childcare Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
14. Elderly/disabled household allowance	Yes <input type="checkbox"/> No <input type="checkbox"/>	\$	
15. Are all expenses/allowances claimed eligible under the HUD Handbook 4350.3 REV-1?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:	
16. Was the correct unit rent used for rent determination?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:	
<b>Enter the reviewer verified amounts for the following:</b>	<b>Amount Reported on the 50059</b>	<b>Did income information on the 50059 agree with verified file information? If no, comment on Discrepancies Identified.</b>	
17. Total Tenant Payment \$	\$	Comments:	
18. Tenant Rent \$	\$	Comments:	
19. Utility Reimbursement \$	\$	Comments:	
20. Assistance Payment \$	\$	Comments:	
21. Is the tenant paying minimum rent?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:	
22. Has a hardship exception been granted for paying minimum rent?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:	
23. Was a 30-day rent increase notice provided to tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:	
24. If applicable, has tenant entered into a written payment plan for monies due to the project?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:	



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E. BILLING		
1. Does the assistance payment requested on the monthly billing (HUD-52670-A, Part 1) agree with the assistance payment on the 50059 data requirements?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
2. If required, have adjustments been made to the monthly billing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
F. MOVE-OUT FILE REVIEW ONLY		
1. Was there a move-out notice from tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
2. Was there a move-out inspection?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
3. If there is a move-out inspection, is it dated?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
4. Was the security deposit refunded to tenant within 30 days or in accordance with state/local laws whichever is shorter?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
5. Was an itemized list of the damages and charges provided to the tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
6. Were any additional charges paid by tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
7. Does the tenant move-out date on voucher match the date the tenant vacated unit?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
G. APPLICANT REJECTION REVIEW ONLY		
1. Was the reason the applicant was denied submission in accordance with the Tenant Selection Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
2. Did the rejection letter provide the applicant the right to appeal?	Yes <input type="checkbox"/> No <input type="checkbox"/>	Comments:
3. If the applicant appealed, was the appeal reviewed by someone other than the person who made the original decision?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:
4. Was the appeal processed and applicant notified of appeal decision within five days of the meeting?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Comments:



# What Are We Looking For in the File?

## Section A: Household Information

### Application

- Date and Time application taken (if handwritten did management initial)
- Management Signature
- Tenant Signature
- Is application completely filled out

# What Are We Looking For in the File?

- Is there sufficient information to determine eligibility
- Supplemental Information to Application Form



# What are we looking for in the file?

Required Documents (forms should be completely filled out and the most current version)

- Declaration of Citizenship
- Race/Ethnicity Form
- Rights and Responsibilities
- EIV and You Brochure



# What Are We Looking For in the File?

- Rent Fact Sheet: How your Rent is Determined
- 9887/9887-A Consent Form
  - Top boxes completed
  - Executed prior to verifications being completed
- Owner Created consent forms



# What Are We Looking For in the File?

- Owner's Summary of Family (to be completed by management)
- Family Summary Sheet (to be completed by the tenant)
- Lead Based Paint Disclosure Acknowledgement (if applicable)



# What Are We Looking For in the File?

## Section B: Verification

- Social Security Number Documentation
- Eligible Immigrant Status or Citizenship
- Disability Verification (if applicable)
  - Sufficient verification for the type of property





# What Are We Looking For in the File?

- Student Verification (if applicable)
- Age Verification (if applicable)
- Assets Disposed of for Less than Fair Market Value in the last two years
- Is there documentation in the file showing that all screening was done in accordance with the Tenant Selection Plan



# What Are We Looking For in the File?

## Section C: Lease

- Correct HUD Model Lease (or HUD approved lease – if applicable)
- Management Signature and date
- Tenant Signature and date
- All Lease Addendums (House Rules, Pet Rules, VAWA, etc)



# What Are We Looking For in the File?

- Lease properly completed
  - Property/Tenant Information
  - Rent amount
  - Lease Terms
  - Recertification Dates
  - Security Deposit amount



# What Are We Looking For in the File?

- Correct Security Deposit amount taken
  - If installments, are they taken in proper intervals
  - Security Deposits maintained in the correct type of bank account
- Correct Pet Deposit amount



# What Are We Looking For in the File?

- Move in Inspection Form (including Unit Transfers)
  - Decent, Safe and Sanitary Statement
  - Management Signature and date before occupancy
  - Tenant Signature and date before occupancy
- Annual Inspection



# What Are We Looking For in the File?

## Section D: Certification/ Recertification Activities

- Recertification notices in file (Initial, 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>)
  - Sent in the proper intervals
  - Contain all required language



# What Are We Looking For in the File?

- Recertification completed on time
- 50059 signed and dated by Tenant
- 50059 signed and dated by Management
- Are income limits correctly listed on the 50059
- Does the eligibility code match tenant's citizenship status



# What Are We Looking For in the File?

- Household Members properly identified
- Correct Unit Size (over/under housed)
- Income Eligibility
- Correct income information (matches application/recertification questionnaire and verifications)





# What Are We Looking For in the File?

- Correct asset information (matches application/recertification questionnaire and verifications)
- Correct expenses/deductions (matches applications/recertification questionnaire and verifications)
- Was 30 day notice of rent increase provided



# What Are We Looking For in the File?

- 50059 fields contain correct information
- Are tenants paying minimum rent
  - Documentation that a hardship exemption been granted
- Is Gross Rent 50059 in file



# What Are We Looking For in the File?

## Section E: Billing

- Correct Gross Rent, Contract Rent, and Utility Allowance
- Correct Tenant Rent, Total Tenant Payment, Utility Reimbursement and Assistance Payment
- Does amount of Assistance Payment requested match the voucher



# What Are We Looking For in the File?

## Section F: Move-out

- Move out notice from tenant
- Move out inspection
- Check Number of Security Deposit Refund and when it was sent (was it within 30 days)
- Does move out date in file match the voucher



# What Are We Looking For in the File?

- Security Deposit Disposition Letter sent to tenant and documentation of when it was sent
  - Was it sent within 30 days
  - Were any deductions itemized
  - Were damage charges based on actual cost of materials and labor and is documentation in file



# What Are We Looking For in the File?

## Section G: Applicant Rejection

- Was Applicant Rejection Letter sent to applicant
  - Does letter state reason for rejection
  - Does letter have the appeal process
  - Does letter have reasonable accommodation language



# What Are We Looking For in the File?

- Was applicant rejected for a reason listed in the Tenant Selection Plan
- Was applicant notified of appeal decision within five days of meeting with the tenant
- Was the appeal reviewed by someone other than the person who made the original decision



# Questions???

