The Enterprise Income Verification (EIV) System

North Tampa Housing Development Corporation

March 7, 2013

Owner/Agent Workshop

Tampa

North Tampa Housing Development Corporation

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NORTH TAMPA HOUSING DEVELOPMENT CORPORATION

NTHDC EIV Training

Key EIV Notices

Using EIV Reports

Tenants Obligation to Repay

Other EIV Issues

Questions

EIV Notices

HUD Notice 2012-26 (Also issued as 11-25 and 10-02)

- ✓ EIV and You Brochure

HUD Notice 2010-08

- ✓ SSN Documentation and Verification Requirements

HUD Notice 2010-10 – Now outdated.

- ✓ Use of Reports

HUD Notice 2011-21

- ✓ Updated Use requirements for EIV (replaces 10-10)

NTHDC EIV Training

Key EIV Notices

Using EIV Reports

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Other EIV Issues

Questions

Employment and Income Data

Social Security Administration:

- Social Security Benefits (SS) benefits
- Supplement Security Income (SSI) benefits
- Dual Entitlement benefits
- Medicare premium information
- Disability status

National Directory of New Hires (NDNH)

- New hires (W-4)
- Quarterly wages for federal/non federal employees
- Quarterly unemployment compensation

Reports Available in EIV

Income Reports

- Summary
- Income
- Discrepancy
- No Income
- New Hires

Verification Reports

- Existing Tenant Search
- Identity Verification
  - Failed EIV Prescreening
  - Failed Verification
- Multiple Subsidy
- Deceased Tenant

Existing Tenant Search Report

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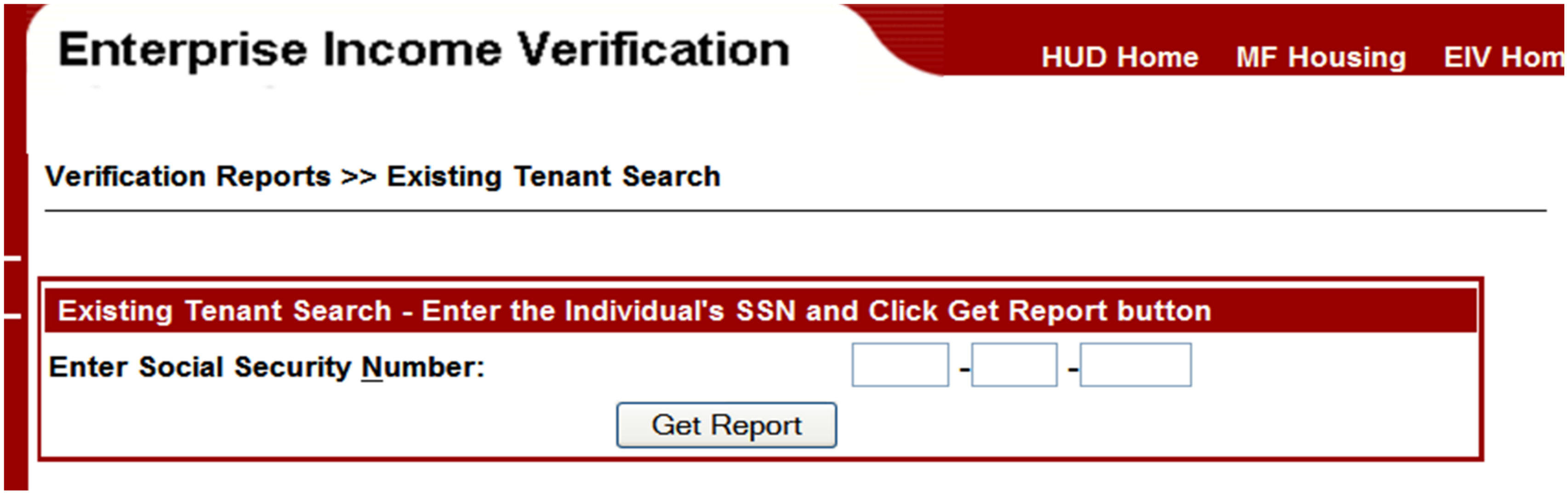
Existing Tenant Search

MUST generate this report prior to move-in

- System searches for a match based on SSN in both Public Housing and Multifamily Properties
- Identifies applicants that may be currently receiving subsidy to help avoid Double Subsidy problems
- Use of the report must be included in the Tenant Selection Plan

Existing Tenant Search



- Must be run for all household members including dependents – one at a time
- Print the result for each member and place them in the tenant file or with application
- Retain report for 3 years after move-out or with application if they do not move-in for 3 years

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Existing Tenant Search

Enterprise Income Verification

HUD Home MF Housing EIV Home Search Email

Verification Reports >> Existing Tenant Search

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

income.discrepancy.print.version

PIH Tenant Match Results : 0 match found.

No match found in PIH programs for SSN: ***-**-3654

MF Tenant Match Results : 0 match found.

No match found in MF programs for SSN: ***-**-3654

No Issues for this applicant!

Existing Tenant Search

Enterprise Income Verification

HUD Home MF Housing EIV Home

Verification Reports >> Existing Tenant Search

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

PIH Tenant Match Results : 0 match found.

No match found in PIH programs for SSN: *-**-4818**

MF Tenant Match Results : 1 match found.

SSN:	**Full SSN is printed**
HOH SSN:	***-**-4818
HOH First Name	SUSAN
HOH Last Name	SMITH
Contract Number	FL29T999999
Project Number	
Subsidy Type	Section 8
Owner/Management Agent name	NTHDC
50059 Type Of Action	Move-In Certification
50059 Effective Date	09/15/2009
Unit Address	-

ALERT! This individual *may be* currently assisted.

Follow-up with respective PHA/Owner/Agent to confirm individual's program participation status before admission into program.

Existing Tenant Search

If there is a household member that is listed in EIV as being an existing tenant:

1. Discuss the result with applicant
2. Contact the manager at the other property to verify the applicant is an existing tenant
3. Coordinate the move-out / move-in dates to avoid double subsidy problems
4. Maintain documentation of all follow up actions taken including contact with applicant and the other property

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Summary, Income, and Discrepancy Reports

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Income Reports

- Summary Report
- Income Report
  - *New admissions*
  - *Applicants*
- Income Discrepancy Report
- No Income Report
- New Hires Report

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Summary, Income, & Discrepancy Reports

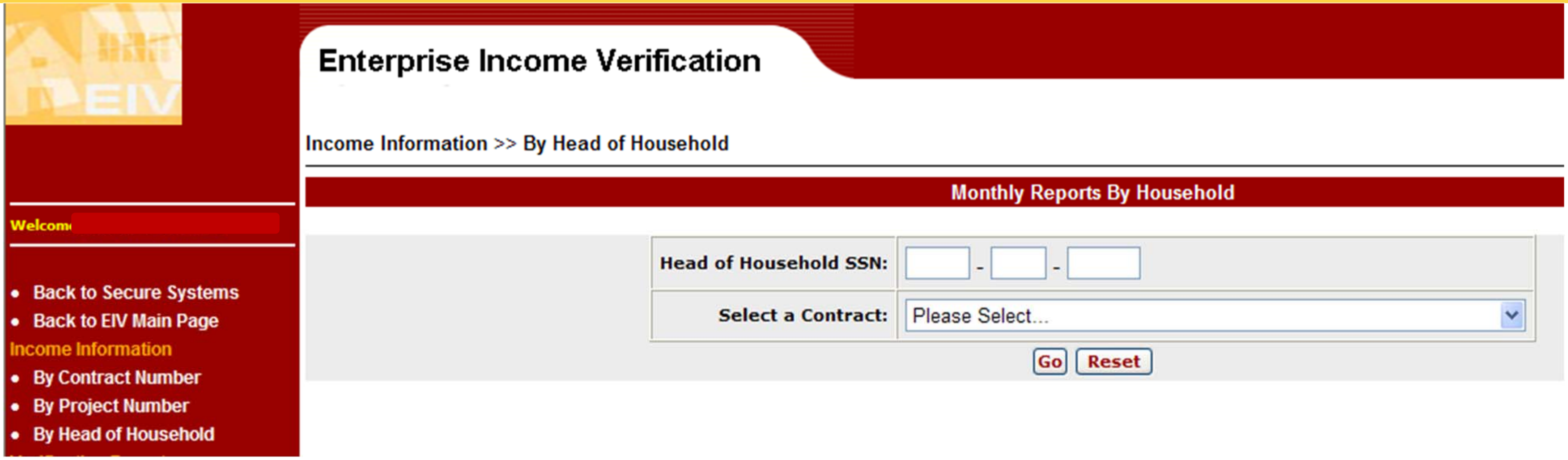
- All 3 reports are automatically generated each time the Income Report is run in EIV
- System searches for available personal identifiers and income data for each member and matches that data to information listed on the last 50059 submitted to TRACS
- **Must** generate these reports within **90 days after MI or IC 50059 submission** to TRACS
- Must generate these reports at each AR & IR (and other times if so outlined in O/A procedures)

Summary, Income, and Discrepancy Reports

There are 2 possible ways to generate these reports in EIV:

1. By SSN for Head of Household
   - Will only generate these reports for that individual's household
2. By Contract Number and specified recertification month
   - Will generate these reports for all households with an anniversary date for the specified month

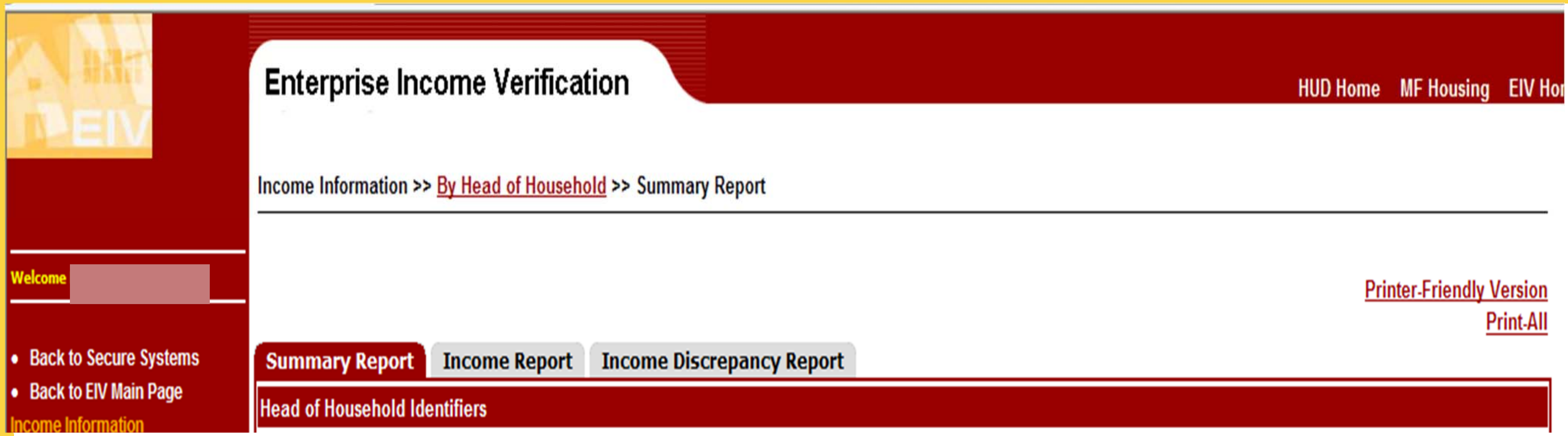
Summary, Income, and Discrepancy Reports



By SSN for Head of Household

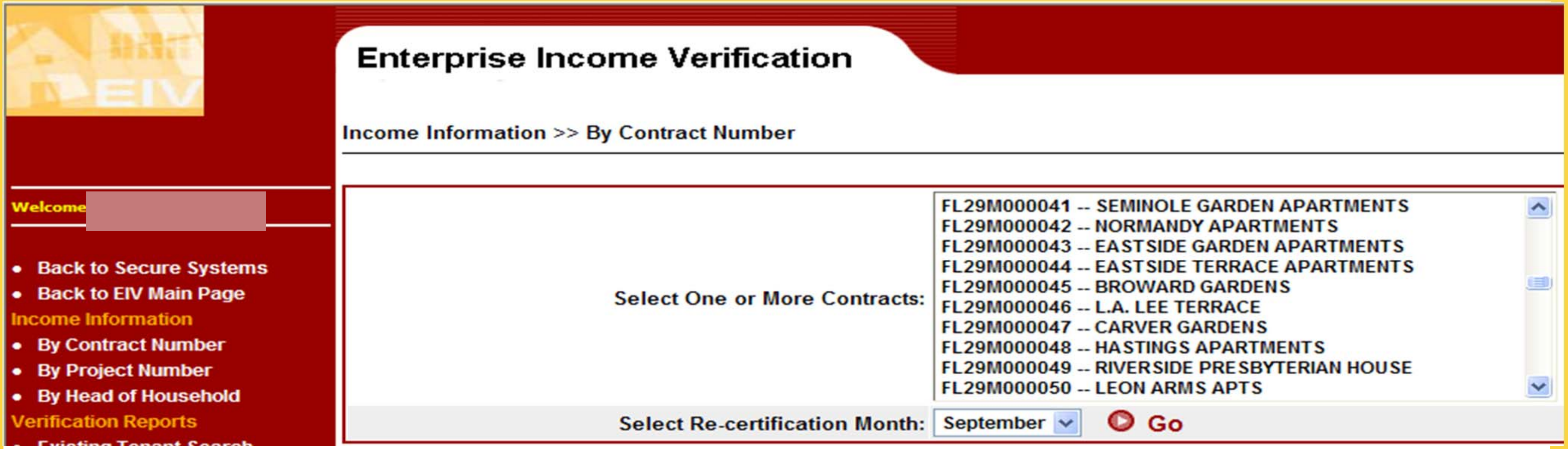
1. Click on “By Head of Household” on the left side of the EIV screen under Income Information
2. Enter Head’s SSN
3. Select Contract
4. Click Go

Summary, Income, and Discrepancy Reports



- Summary, Income, and Discrepancy Reports will appear for that household
- When you generate the reports in this way there is a **"Print-All"** feature in the top right of the EIV screen that will allow you to view and print all 3 reports at once for that household

Summary, Income, and Discrepancy Reports



By Contract Number and specified recertification month

1. Click on “By Contract Number”
2. Select Contract
3. Select Re-Certification Month
4. Click Go

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Summary, Income, and Discrepancy Reports

Monthly Report Summary		
Contract(s)	FL299999999	
Re-certification Month	April	

Report Type	Number of Households	Number of Members
Income Report	4	4
Income Discrepancy Report	1	
No Income Reported on 50059	2	2
No Income Reported by HHS or SSA	1	1
New Hires Report	0	0

- A Monthly Report Summary will appear
- Click on Income Report and a list of the households up for recertification in the specified month will appear, listed alphabetically by HOH
- Click on each name individually on the list to get to the reports for that household

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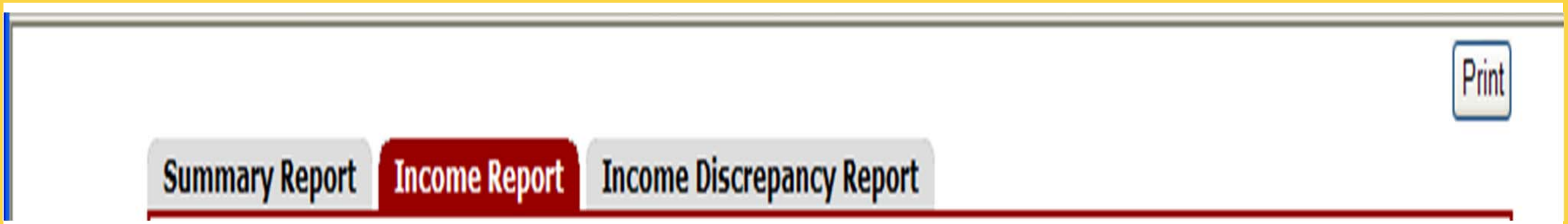
Summary, Income, and Discrepancy Reports



- Summary, Income, and Discrepancy Reports will appear for that household

- When you generate the reports in this way there is **<u>NOT</u>** a “Print-All” feature in the top right of the EIV screen; therefore you will have to click on each report tab and print each report separately for each household on the list

Summary Report

Summary Report

- Lists all members of the household with their personal identifiers and Identity Verification Status

- Their status will be either:
  1. Verified – info on 50059 matches SSA
  2. Failed – member info does not match
  3. Not Verified – member 50059 info has not been sent to EIV
  4. Deceased – member reported by SSA as deceased

NOTE: EIV will only have income info for tenants whose status is Verified.

Summary Report

Example 1: Individual(s) with an EIV Identity Verification Status of Verified

Household Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
***-**-0000	SANDRA	S	XX/XX/1984	24	Head of Household	Verified
***-**-0001	JOHN	S	XX/XX/2005	2	Child	Verified

Example 2: Individual(s) with an EIV Identity Verification Status of Failed

Household Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
***-**-0080	SERGIA		XX/XX/1956	53	Head	Failed

Example 3: Individual(s) with an EIV Identity Verification Status of Not Verified

Household Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
***-**-0001	JOHN	S	XX/XX/1986	22	Head of Household	Not Verified

Example 4: Individual(s) with an EIV Identity Verification Status of Deceased.

Household Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
***-**-0001	JOHN	S	XX/XX/1932	77	Head of	Deceased

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Summary Report

- The Summary Report MUST be printed and retained in the tenant file indicating the status for each household member

- This report is also used for verification of the SSN. The report only needs to be printed one time if all members are listed as Verified unless the family composition changes

- Once Verified, O/As may choose to destroy SSN verification, however, this is optional

Summary Report

- Must review the Summary Report each time the Income Report is generated
- Must continue to print and maintain in the tenant file all Summary Reports that do not list all members as Verified
- 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 Failed Verification report monthly as changes in the status for these tenants may occur

Summary Report

- Must resolve the status of any member with a Failed or Deceased status
  - Correct 50059 data entry errors and resubmit the 50059
  - Encourage tenant to contact SSA to correct incorrect data from SSA

- Must maintain file notes and documentation of all follow up action taken to resolve the status
  - Includes maintaining documentation of verified exemption for any member of the household that is exempt from providing a SSN

Income Report

Income Report

- Income Report includes information for each household member for:
  - Wages
  - Unemployment benefits
  - Social Security benefits
    - SS
    - SSI
    - Dual Entitlements
    - Medicare

Income Report

Wages

- Information is updated quarterly - approximately 1 to 2 months after the end of the calendar quarter

- The Income Report is 3rd party verification that tenant is employed; If the information on report matches tenant reported information no other 3rd party verification is necessary

- Wage information in EIV cannot be used to calculate income; 4 - 6 consecutive, recent paystubs must be obtained from the tenant to calculate income

Income Report - Wages

Employment Information				
Hire Date	Hire State	FEIN	Employer Name and Address	Date Received by EIV
Not Available	VA	03-0394176	HOLIDAY CVS L L C 500 S 11TH ST, LAKE WALES FL 33853-4901	01/18/2008

Wages				
Pay Period	Amount	FEIN	Employer Name and Address	Date Received by EIV
Q4 of 2009	$4,067.00	03-0394176	HOLIDAY CVS LLC 1 CVS DR, WOONSOCKET RI 02895-6146	03/23/2010
Q3 of 2009	$3,953.00	03-0394176	HOLIDAY CVS LLC 1 CVS DR, WOONSOCKET RI 02895-6146	11/19/2009
Q2 of 2009	$3,625.00	03-0394176	HOLIDAY CVS LLC 1 CVS DR, WOONSOCKET RI 02895-6146	08/19/2009
Q1 of 2009	$3,656.00	03-0394176	HOLIDAY CVS LLC 1 CVS DR, WOONSOCKET RI 02895-6146	05/26/2009
Q4 of 2008	$3,446.00	03-0394176	HOLIDAY CVS LLC 1 CVS DR, WOONSOCKET RI 02895-6146	02/25/2009

Income Report - Wages

Obtain traditional 3rd party verification of employment if:

- Tenant insists they are not employed but wage information is listed in EIV
- Tenant reports recently gaining or losing a job
- Tenant reports they are working but no wage information is in EIV
- Tenant disputes any of the information obtained

Unemployment Benefits

- Information is updated quarterly - approximately 1 - 2 months after the end of the calendar quarter
- EIV serves as 3rd party verification that tenant is receiving unemployment benefits
  - If information on report matches tenant reported information no other 3rd party verification is necessary
- Must obtain 4 - 6 consecutive benefit "paystubs" or benefit letter from tenant to calculate income
  - Information in EIV cannot be used to calculate income

Income Report – Unemployment Benefits

Obtain traditional 3rd party verification of Unemployment Benefits if:

- Tenant insists they are not receiving unemployment, but benefit information is listed in EIV
- Tenant reports they are receiving unemployment, but no benefit information is in EIV

Income Report – Social Security Benefits

Social Security Benefits

- EIV serves as third party verification and can be used to calculate annual income from SSA benefits as long as the tenant agrees with the information

Income Report – Social Security Benefits

SSA COLA is not available in EIV until the end of the calendar year.

For AR's effective 1/1 – 4/1, O/A must use 1 of 3 methods for determining the tenant's income

1. Use the undisputed gross income reported by EIV if tenant agrees that is the amount being received
2. Use an SSA letter inclusive of the COLA adjustment that is dated within 120 days
3. Apply the COLA increase to the verified current amount of income and document the file with how the tenant's income was determined

NOTE: Policies and Procedures should be updated to state what procedure the OA uses to ensure all tenants are treated uniformly

Income Report – Social Security Benefits

Obtain traditional 3rd party verification of SSA Benefits if:

- Tenant disagrees with information in EIV
- The difference between the gross benefit and the net benefit cannot be explained by Medicare Part A or Part B premiums
- Tenant reports they are paying for Medicare Part D (prescription drug coverage)

Income Report – Social Security Benefits

Medicare Data in EIV

- Tenant may be paying for Medicare or may have Medicare premiums paid for by the state
- EIV will not have information on Medicare Part D (prescription drug plan)
- If tenant reports paying for Part D, additional verification (SS award letter) is required

Income Report – Social Security Benefits

Social Security Benefits

Verification Data		Benefit History		
		Date	**Gross Benefit**	
Payment Status Code:	C - Current payment status (except railroad payment)	12/2009	$702.00	Benefits paid
Date of Current Entitlement:	8/2007	12/2008	$702.00	Benefits paid
Net Monthly Benefit if Payable:	$702.00	12/2007	$664.00	Benefits paid
Payee Name and Address:		8/2007	$649.00	Benefits paid

Dual Entitlement

EIV received no benefit data.

Medicare Data

EIV received no benefit data.

- Gross benefit and net benefit are the same ($702) – tenant is not paying for Medicare

Income Report – Social Security Benefits

Social Security Benefits

Verification Data		Benefit History		
		Date	**Gross Benefit**	
Payment Status Code:	C - Current payment status (except railroad payment)	12/2009	$1,148.50	Benefits paid
Date of Current Entitlement:	3/1989	12/2008	$1,148.40	Benefits paid
Net Monthly Benefit if Payable:	$1,052.00	12/2007	$1,085.40	Benefits paid
		12/2006	$1,061.50	Benefits paid

Medicare Data

Verification Data		Premium	Buy-in	Buy-in Start	Buy-in Stop
Payee Name and Address:	**Hospital Insurance:**	$0.00	N	Not Available	Not Available
	Supp. Med. Insurance:	$96.50	N	Not Available	Not Available

Difference between Gross benefit and net benefit is $96.50 – tenant is paying for Medicare

Income Report – Social Security Benefits

Social Security Benefits

Verification Data		Benefit History		
Payment Status Code:	C - Current payment status (except railroad payment)	Date	Gross Benefit	
Date of Current Entitlement:	9/1986	5/2009	$1,505.40	Benefits paid
Net Monthly Benefit if Payable:	$1,373.90	1/2009	$1,505.00	Benefits paid
Payee Name and Address:		12/2008	$1,505.40	Benefits paid
		12/2007	$1,422.40	Benefits paid

Medicare Data

Verification Data		Premium	Buy-in	Buy-in Start	Buy-in Stop
Payee Name and Address:	Hospital Insurance:	$0.00	N	Not Available	Not Available
	Supp. Med. Insurance:	$96.40	Y	02/01/2009	05/01/2009

Date Received by EIV: 03/02/2010

Difference between Gross and Net is $131.50; Medicare is $96.40; further verification is needed

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Income Report

- The Social Security benefit letter often includes cents $1080.50. The EIV report does not include the cents $1080
- Which do we use?
  - Tenant does not dispute EIV - Use $1080. Award letter is not needed for income
  - Tenant disputes EIV – get and use the award letter

Income Report

- Must review the Income Report at each AR, IR, and 90 days after MI or IC 50059 submission as well as at other times as specified in Owner/Agent's policies and procedures

- Must print and retain the Income Report in tenant file for term of tenancy and 3 years after move-out

- Must resolve possible instances of unreported or underreported income

- Must maintain all required supporting documentation

Income Report

Income Report Results Scenarios:

- Tenant agrees with EIV: Use paystubs from tenant for wages or unemployment. Use SS amounts from EIV. Obtain third party verification if EIV does not explain Medicare deductions
- Tenant Disputes EIV: Obtain and use third party verification of the disputed information
- Income unable to be verified through the EIV System: Obtain and use third party verification
- Possible unreported/underreported income: Notate the file: notification and contact with tenant, verifications, corrected/ additional 50059s, repayment agreement etc…

What about applicants and new MI's?

EIV only contains employment and income information for existing tenants participating in Multifamily Housing's Rental Assistance programs.

Income Discrepancy Report

Income Discrepancy Report

- EIV compares the income from the 50059 with income reported from NDNH and SSA
- Income from sources such as child support, family contributions, and income from assets is not included in the comparison
- An Income Discrepancy will be reported if the annual income in TRACS is different from the actual or annualized income in EIV by more than $2400 per year (higher or lower) for the period of income (POI) listed on the report

Income Discrepancy Report

- Period of Income (POI) will be a 12 month period beginning 15 months prior to the effective date of the last 50059 in TRACS
  - The 50059 income is compared to:
    1. The actual EIV reported income for the POI
    2. The annualized amount from the last quarter of the POI
- All discrepancies identified on the report must be investigated by the O/A to determine whether or not the discrepancy is valid

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Income Discrepancy Report

Head of Household Information		
Name:	CHARLES SMITH	
Social Security Number:	***-**-9999	
Contract Number	FL290099999	
Project Number		
Project:		
Effective Date of Action:	08/07/2009	
Next Re-certification Date:	08/01/2010	
Projected Annual Wages and Benefits from Form HUD-50059:	$5,860.00	
Period Of Income for Discrepancy Analysis	05/07/2008 - 05/06/2009	
Discrepancy Analysis	**Actuals**	**Annualized Last Quarter**
Reported Annual Wages and Benefits from EIV Data:	$8,182.18	$8,275.77
Amount of Annual Income Discrepancy:	($2,322.18)	**($2,415.77)**
Amount of Monthly Income Discrepancy:	($193.52)	($201.31)
Percentage of Income Discrepancy:	(28.38%)	(29.19%)

Note: Negative numbers represent potential under reporting of income. Please discuss this income discrepancy with the tenant. Positive numbers represent potential decrease in tenant income.

Income Discrepancy Report

An Income Discrepancy may be caused by:

- Tenant did not report income
- Tenant did not report a change in income of more than $200 per month (increase or decrease)
- Owner/Agent made an error in calculation of annual income or in data entry on the 50059
- A false alarm – there really is no discrepancy

Income Discrepancy Report

Examples of Owner/Agent errors that may cause a discrepancy:

- Tenant's wages are paid every 2 weeks, but Owner/Agent multiplied wages by 52 instead of by 26
- Tenant has income from child support, but on the 50059 it is recorded as income from wages

Income Discrepancy Report

Examples of a false alarm:

- Tenant had their hours worked reduced shortly before certification
- Tenant lost job or became employed shortly before certification

Effective Date of Action:	08/07/2009	
Next Re-certification Date:	08/01/2010	
Projected Annual Wages and Benefits from Form HUD-50059:	$5,860.00	
Period Of Income for Discrepancy Analysis	05/07/2008 - 05/06/2009	
Discrepancy Analysis	**Actuals**	**Annualized Last Quarter**
Reported Annual Wages and Benefits from EIV Data:	$8,182.18	$8,275.77

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Income Discrepancy Report

If a tenant has a discrepancy listed on the Income Discrepancy Report:

Within 30 days from the date of the report review and resolve the discrepancy

- Determine if O/A error, tenant error (unreported/underreported), or false alarm
- Review the file, verifications, and 50059(s)
- Check for verification, miscalculation, or data entry errors
- If necessary, send notice to tenant and discuss the possible discrepancy with them
- If necessary, obtain 3rd party verification - required if unreported/underreported income

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Income Discrepancy Report

If <u>Owner/Agent error</u>:

- Process a corrected 50059 retroactive for all 50059s affected by the error (MI, IR, GR, etc…)
- Make the necessary voucher adjustments
- For decreases due to O/A error, refund the tenant for over-payment in rent for the entire affected period
- For increases due to solely to O/A error (there was no unreported or underreported income by the tenant), the tenant can not be charged back rent

Income Discrepancy Report

If <u>tenant error (unreported/underreported)</u>:

- Process a corrected 50059 retroactive for all 50059s affected by the error (MI, IR, GR, etc…)
- Send notice to the tenant
- Require repayment of total overpayment in assistance for the affected period
  - Must allow tenant to enter into a repayment agreement if unable to pay in full
- If warranted, terminate tenancy, file civil action and notify HUD OIG Office of suspected fraud

Income Discrepancy Report

If false alarm:

- Make clear and complete file notations fully describing why it is a false alarm and maintain all supporting documentation collected

Income Discrepancy Report

- Must maintain Income Discrepancy Report in the tenant file with documentation of all follow up action taken to resolve possible unreported or underreported income including file notes, contact with tenant, verifications, corrected/additional 50059s, repayment agreement etc…

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Property-Wide Reports

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Identity Verification Report

- Identifies members that have discrepancies with personal identifiers (name, DOB, SSN)
- Consists of 2 parts:
  - Failed EIV Prescreening Report
  - Failed Verification Report
- MUST generate both reports monthly
- Generate these reports by selecting a Contract Number and Recertification Month = All

Identity Verification Report

Identity Verification Reports as of	
Contract Number	FL299999999
Re-Certification Month	All

Printer Friendly Version

Identity Verification Reports	
• Number of households Not-Verified (verification in process)	3
• Failed EIV Pre-Screening	2
• Failed Verification Report (Failed the SSA Identity Test)	3

- Click on each report individually to view/print each report
- If 0 households listed for one or both of the reports, print this screen as your monthly report

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Failed EIV Prescreening Report

- Identifies household members with invalid or missing SSN, Last Name, or Date of Birth in TRACS (information will not be sent to SSA from EIV)
- EIV will not have any income data for any tenant listed on the Failed EIV Prescreening Report
  - *Income report will state Income information cannot be displayed as the tenant identity has not been verified.*
- Most common error – SSN on 50059 is a temporary number

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Failed EIV Prescreening Report

Failed EIV Pre-Screening Report for Contract: FL29009999		
HOH SSN: XXx-xx-xxxx |	HOH Name: FREDRICKA SMITH |	Project Number: -
Member SSN	Member Name	Error Description
T74-93-9999	CODRIANA SMITH	Failed SSN check.

- Report will indicate what personal identifier did not pass the prescreening

Failed EIV Prescreening Report

If a tenant is listed on Failed EIV Prescreening:

- Within 30 days resolve the issue
  - Check information in tenant file against the info on the 50059
    - Correct all 50059 data that was incorrectly entered and submit the corrected 50059 to TRACS
  - If necessary follow up with the tenant to confirm the personal identifier listed on the report and obtain additional info/documentation of the correct info
    - Correct all 50059 data that was incorrect and submit the corrected 50059

Failed EIV Prescreening Report

- Notate on the report or in the Master Report file:
- if corrections for a household member has already been made and EIV data has not yet been updated
- if a SSN is missing and the member is a verified exempt member (not required to provide SSN)
- Maintain documentation of all follow up actions taken including file notes, contact with tenant, corrected 50059

Failed EIV Prescreening Report

- Must print and retain the report even if 0 results are found
  - Failed EIV Prescreening Report <u>with notations of follow up action taken</u> in the Master file for Failed EIV Prescreening Reports for 3 years from date of report
  - Corrected 50059s and other documentation of follow up <u>in the tenant file</u> for term of tenancy plus 3 years

Failed Verification Report

- Identifies household members with SSN, Last Name, or Date of Birth that does not match the info reported by SSA for that member
- EIV will not have any income data for any tenant listed on the Failed Verification Report
  - *Income report will state Verification failed – and provide the reason why the verification failed.*

Failed Verification Report

Failed Verification Report		
HOH SSN: XXX-XX-XXXX | HOH Name: DORTHY SMITH | Project Number: - |		
Member SSN	Member Name	Error Description
XXX-XX-XXXX	MITCHELL SMITH	Verification failed - Date of birth matched, but surname did not match with SSA records

- The report will indicate what personal identifier did not pass the verification with SSA records.

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Failed Verification Report

If a tenant is listed on Failed Verification Report:

- Within 30 days resolve the issue
  - Check information in tenant file against the info on the 50059
  - If necessary follow up with the tenant to confirm the personal identifier listed on the report and obtain additional info/documentation of the correct info
  - Correct all 50059 data that was incorrect and submit the corrected 50059
  - Require tenant to contact SSA to correct incorrect data from SSA

Failed Verification Report

- Notate on the report or in the Master Report file if corrections for a listed member have already been made and EIV data has not yet been updated

- Maintain documentation of all follow up actions taken including file notes, contact with tenant, corrected 50059

Failed Verification Report

- Must print and retain the report even if 0 results are found
  - Failed Verification Report with notations of follow up action taken in the Master file for Failed EIV Verification Reports for 3 years from date of report
  - Corrected 50059s and other documentation of follow up in the tenant file for term of tenancy plus 3 years

New Hires Report

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New Hires Report

- Identifies tenants who have started a job in the last 6 months

- MUST generate this report at least quarterly (or more frequently as outlined in the Owner/Agent's EIV procedures)

- Generate the report by clicking on New Hires Report on the Left Menu
- Then Select a Contract Number and Recertification Month = All

New Hires Report

Select a Contract Number, Select "All", click on Get Report

New Hires Report

Printer-Friendly Version

Summary Reports | **Detail Reports**

HOH SSN	HOH Last Name	HOH First Name	HOH DOB	Member First Name	Member Last Name	Contract Number	Project Number	Unit Address
***-**-9999	AHERN	HARRY	XX/XX/1903	JOHN	AHERN	FL999999999		
***-**-9998	TIBBS	SHERRY	XX/XX/1902	SHERRY	TIBBS	FL999999999		

- A New Hires Summary Report will be generated
- Click on the Detail Reports tab to get detailed information (hire date, name of employer) for each household and each member listed on the Summary Report

New Hires Report

Summary Reports | Detail Reports | Printer-Fri Ve

New Hires Report for Household of HARRY AHERN

Contract Number	FL999999999	**Subsidy Type:**	Section 8
Project Number		**Project:**	APARTMENTS
Next Re-certification Date:	09/01/2013	**Form 50059 as of:**	11/08/2012
Address:			
Most Recent Type of Action:	AR-Annual Recertification	**Effective Date:**	09/01/2012

Head of Household: HARRY AHERN

Social Security Number:	***-**-9999	**Date of Birth:**	XX/XX/1903

Family Member: JOHN R AHERN SSN: *-**-8888 Date of Birth: XX/XX/1980**

Employment Information

Hire Date	Hire State	FEIN	Employer Name and Address	Date Received by EIV
07/31/2012	FL	99-999898	KMART CORPORATION Tampa, FL	09/29/2012
10/13/2010	FL	99-999899	Tampa Market Tampa, FL	11/18/2010

New Hires Detail Report Example

New Hires Report

If any tenants are listed on the New Hires Report:

- Determine if tenant has reported the change
- Contact the tenant and confirm the employment

- If tenant confirms the info is correct:
  - Obtain check stubs, employer letter, or 3rd party verification to calculate income
  - Process an IR 50059 if increase in income is more than $200 per month
    - Retroactive effective date for unreported income
  - Require tenant to payback any subsidy overpayment
    - Allow repayment agreement if needed

New Hires Report

- **If tenant disputes the info:**
  - Obtain 3rd party verification from the employer
  - If 3rd party confirms there is in fact unreported income over $200 per month:
    - Process an IR 50059
      - Retroactive effective date
      - Require tenant to payback any overpayment
    - Allow repayment agreement if needed

NORTH TAMPA HOUSING DEVELOPMENT CORPORATION

New Hires Report

- Maintain documentation of all follow up actions taken including file notes, contact with tenant, verifications, IR 50059, repayment agreement…
- Must print and retain report even if 0 results are found
- Summary Report tab for New Hires Report <u>with notations of follow up action taken</u> in the Master file for New Hires Reports for 3 years from date of report
- Detail Report tab for New Hires Report <u>in the tenant file</u> with the follow up documentation for term of tenancy plus 3 years

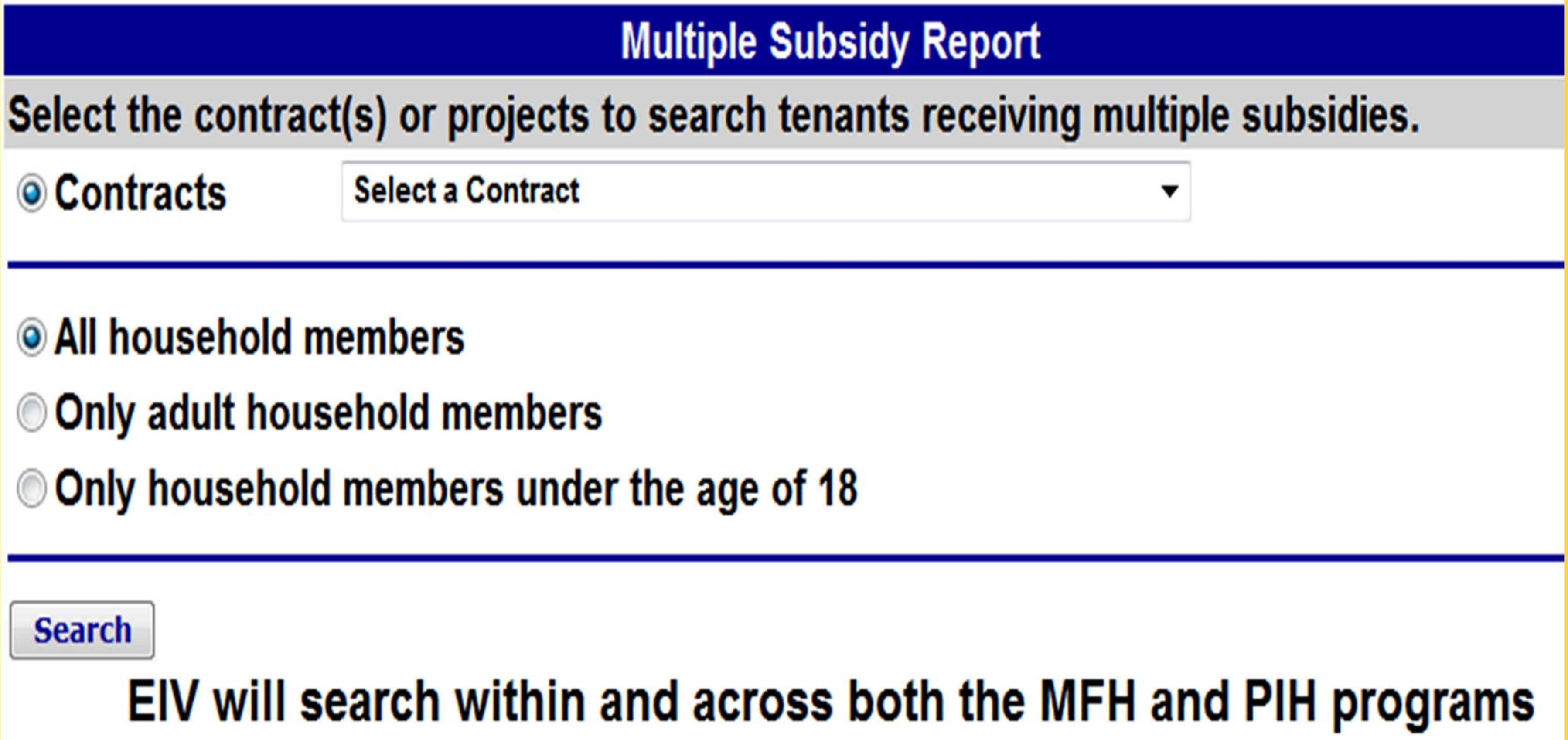
Multiple Subsidy Report

North Tampa Housing Development Corporation

Multiple Subsidy Report

- Identifies tenants who <u>may</u> be receiving assistance at another property
- <u>MUST</u> generate this report at least quarterly (or more frequently as outlined in the Owner/Agent's EIV procedures)
- Generate this report by Contract Number and All household members

Multiple Subsidy Report



Select all household members when running this report for quarterly requirements

Multiple Subsidy Report

Multiple Subsidy Report Summary	
Contract Number:	FL999999999
Members Receiving Multiple Subsidies:	0
Search Criteria:	Within PIH and MF Programs
Search Criteria:	All household members

No Deficiencies Exist

Multiple Subsidy Report

Summary Reports | **Detail Reports**

Member SSN	Member Name	Member DOB	Member Subsidy Count
***-**-9999	EARL CHASE	XX/XX/1969	2
***-**-9998	KAREN CHASE	XX/XX/1999	2
***-**-9988	SUSAN CHASE	XX/XX/2002	2

When there are members who may be receiving multiple subsidy, a summary report will list their SSN, Name and DOB

Multiple Subsidy Report

Detail Reports

Member Information	
Member SSN	99
Member Name	AUDRA SMITH
Member DOB	XX/XX/1973
Count of Subsidies	2

Household Information of Households Where AUDRA SMITH Receives Subsidy	
HOH SSN	***-**-9999
HOH Name	SALLY BELL
Relationship to HOH	Other family Member
Subsidy Type	Section 8
Contract Number	FL290099999
Project Number	
Owner/Management Agent name	NTHDC
50059 Effective Date	03/01/2009
Certification Type	Interim Recertification
Unit Address	, , ,
HOH SSN	***-**-9999
HOH Name	SMITH
Relationship to HOH	Head of Household
Subsidy Type	Section 8
Contract Number	FL29
Project Number	
Owner/Management Agent name	NTHDC
50059 Effective Date	02/01/2010
Certification Type	Annual Recertification
Unit Address	, , ,

Multiple Subsidy Report

If any tenants are listed on the Multiple Subsidy Report:

1. Discuss the result with the tenant
2. Contact the manager at the other property to verify tenant is receiving assistance there
3. Owner/Agents at both properties must determine at which property subsidy should be terminated
4. Maintain documentation of all follow up actions taken including file notes, contact with tenant and other property, and termination of assistance (if applicable)

Multiple Subsidy Report

- Must print and retain the reports generated even if 0 results are found
  - Summary Report tab for Multiple Subsidy Report <u>with notations of follow up action taken</u> in the Master file for Multiple Subsidy Reports for 3 years from date of report
  - Detail Report tab for Multiple Subsidy Report <u>in the tenant file</u> with the follow up documentation for term of tenancy plus 3 years

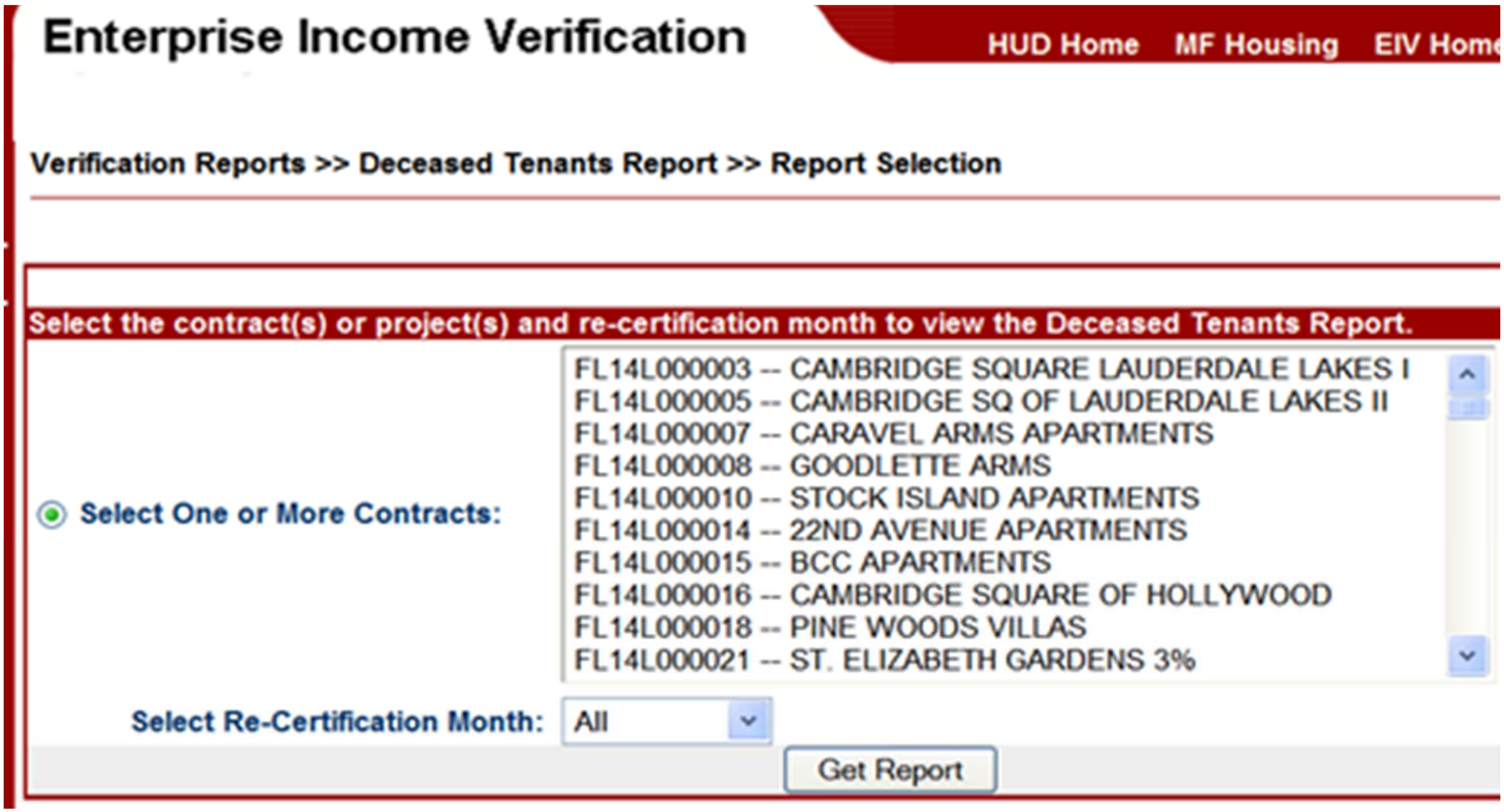
Deceased Tenant Report

North Tampa Housing Development Corporation

Deceased Tenant Report

- Identifies tenants who may be deceased at your property (reported as deceased by SSA)
- MUST generate this report at least quarterly (or more frequently as outlined in the Owner/Agent's EIV procedures)
- Generate this report by Contract Number and recertification month = All

Deceased Tenant Report



Deceased Tenant Report

Deceased Tenants Report by Contract for Reexamination Month - All						
Contract(s)	FL290099999					
Total number of households evaluated	**Total number of household members evaluated**	**Households with deceased members**	**% of households with deceased members**	**# of single member deceased households**	**% of single member deceased households**	**Deceased Members**
241	254	0	00.00%	0	00.00%	0

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There are no records for the selection criteria.

Deceased Tenant Report

Deceased Tenants Report By Contract FL290099999				
HOH SSN: *-**-9999 | HOH Name: JEFF ADAMS |**			**HOH DOB: XX/XX/1944 |**	
Member SSN	Member Name	Member DOB	Member Deceased Date	Date Received by EIV
***-**-9999	JEFF ADAMS	XX/XX/1944	11/26/2009	03/04/2010

- When there are members listed on the report as deceased, an additional list will appear listing personal identifiers of the member and the date they are reported as becoming deceased

Deceased Tenant Report

If any tenants are listed on the Deceased Tenant Report:

1. Confirm in writing the member is deceased
   - HOH, next of kin, emergency contact etc…
2. Within 30 days resolve the issue
   - If member is deceased, process a:
     - MO 50059 for single household
     - IR 50059 to remove the deceased member
   - If member is not deceased:
     - Correct any incorrect data in TRACS
     - Encourage tenant to contact SSA to correct incorrect data from SSA

Deceased Tenant Report

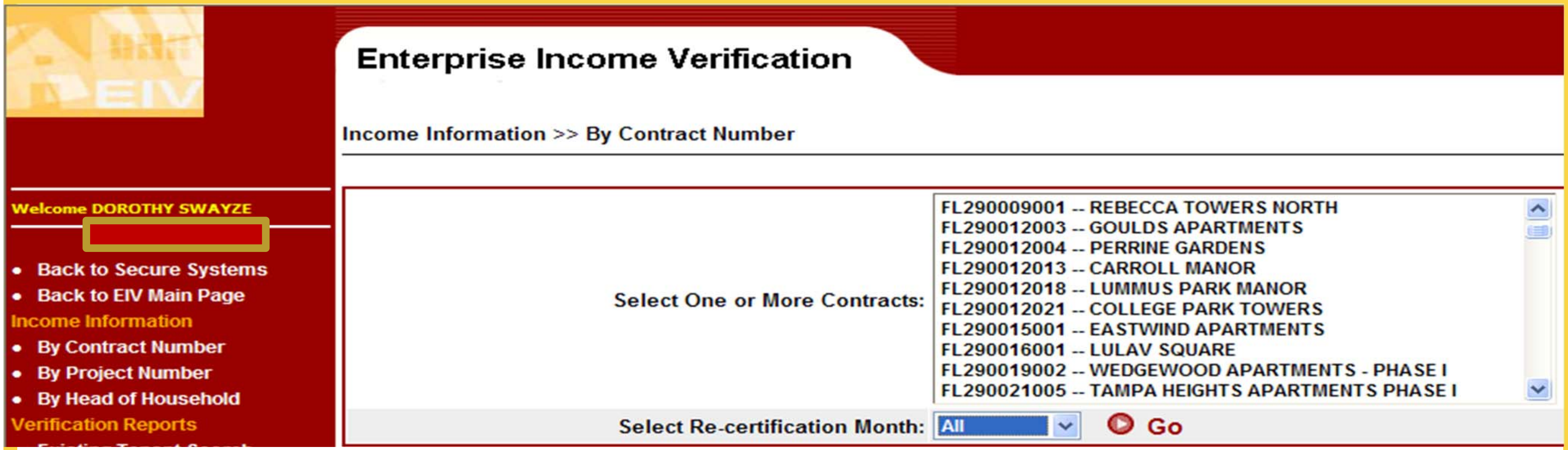
3. Maintain documentation of all follow up actions taken including file notes, contact with HOH, next of kin, emergency contact, etc.. and IR or MO 50059
   - Must print and retain the report even if 0 results are found
   - Deceased Tenant Report <u>with notations of follow up action taken</u> in the Master file for Deceased Tenant Reports for 3 years from date of report
   - 50059s other documentation of follow up <u>in the tenant file</u> for term of tenancy plus 3 years

No Income Report

North Tampa Housing Development Corporation

north tampa housing development corporation

No Income Report



- There is not an individual tab on the left side of the EIV screen for the No Income Report
  - Generate this report by generating the Income Information by Contract Number and Select Recertification Month of “All”

No Income Report

Monthly Report Summary		
Contract(s)	**FL299999999**	
Re-certification Month	**All**	

Report Type	Number of Households	Number of Members
Income Report	85	126
Income Discrepancy Report	18	
No Income Reported on 50059	1	168
No Income Reported by HHS or SSA	10	17
New Hires Report	6	6

- No Income Reported by HHS or SSA – tenants have other sources of income reported on 50059.

No Income Report

- No Income Reported on 50059 identifies tenants with zero income

- HUD Recommends Owner/Agents have a policy to re-verify the status of tenants reporting zero income at least quarterly

- Owner/Agents must use the No Income Report only as identified and described in their policies and procedures

NTHDC EIV Training

Key EIV Notices

Using EIV Reports

Tenants Obligation to Repay

Other EIV Issues

Questions

Valid Discrepancy

The EIV Discrepancy Report shows that there is an income discrepancy in the amount of $15,000. *After* further inquiry the EIV Income report shows that Mr. White has income from a job with ACME Inc., which is consistent with the $15,000 discrepancy.

Investigate:
The O/A must investigate this to determine if the tenant actually did not report the income.

Confirm:
Contact Mr. White requesting an interview. During the interview, ask Mr. White for pay stubs (4-6) from a position with ACME Inc. If paystubs are consistent with EIV, third party verification is not necessary.

Valid Discrepancy

Obtain Verification:

The 3rd party verification shows Mr. White was in fact working

Notify the tenant:

Meet again with Mr. White to discuss the outcome of your investigation and the results of the verification obtained.

Take Action:

Mr. White will now have to enter into a repayment agreement for Subsidy reimbursement to HUD.

How to Calculate the Difference

Original

AR HUD 50059 (7/1/11)

- Income: $12,000

- 12,000/12
- Adjusted x30% = 300
- Gross x10% = 100

- TTP = $300
- Gross Rent = $890
- Subsidy = $590

Corrected

AR HUD 50059 (7/1/11)

- Income: $12,000 and $15,000

- 27,000/12
- Adjusted x30% = 675
- Grossx10%= 225

- TTP = $675
- Gross Rent = $890
- Subsidy = $215

Difference = $375

Tenant's Obligation to Reimburse

- The O/A must go back to the time the unreported or underreporting of income started
- The time should not exceed the 5 year limitation that the tenant was receiving the assistance
- O/A has to calculate the difference in the amount of rent the tenant should have paid from what was actually paid
- A record of this calculation must be provided to the tenant and retained in the tenant's file

Repayment Agreements

- The tenant is required to reimburse the O/A for the difference in the amount of tenant rent that should have been paid and the amount of rent charged
- The tenant may enter into a Repayment Agreement with the O/A for the amount owed if they cannot pay the full amount due

Tenant's Obligation to Reimburse

$375 x 12 months = $4500

Family's monthly TTP = $675

40% of monthly income = $900

Re-payment ***should*** not exceed = $225 / mo.

Can the repayment exceed $225? Yes, if the tenant agrees to pay more.

Repayment Options

Tenants may repay:

1. In a lump sum payment

2. Enter into a repayment agreement

3. A combination of both

Example: Mr. White now owes $4500 and agrees to monthly payments of $125. $4500/125 = 36 Months (time period).

NORTH TAMPA HOUSING DEVELOPMENT CORPORATION

Repayment Agreement

- O/A and tenant must both agree to:
  - Monthly payments *(not to exceed 40%)*
  - Repayment Time Period

- Repayment agreement must:
- Be signed by both the tenant and the O/A. HUD recommends it be signed by HOH and the person whose income was not reported

- Include the total retroactive amount owed, amount of lump sum paid, if applicable, and the monthly payment amount

Repayment Agreement

Repayment Agreement musts (continued):

- Reference the paragraphs of the lease whereby the tenant is in non compliance and may be subject to termination
- Contain a clause whereby terms of the agreement will be renegotiated if there is a change of $200 or more per month
- Include a statement that the monthly retroactive rent repayment amount is in addition to the family's monthly rent payment and is payable to the O/A
- Late and missed payments constitute a default of the repayment agreement and may result in termination of assistance or tenancy or both

Repayment Agreement

- The O/A may retain a portion of the repayments they actually collect from the tenants to help defray the cost of pursuing these cases
- The O/A may only retain an amount to cover their actual costs up to 20% of the amount collected from the tenant
- The O/A must keep records of all costs incurred and provide them if requested by HUD/CA
- Funds retained by the O/A must be deposited in the property's operating account

Incorrect 3rd Party Verification

- What happens if in the process of obtaining 3rd party verification of income, the employer provides incorrect information?

Voucher Reporting

- The O/A must process corrected 50059's and submit electronically through IMAX
- The O/A should have a negative adjustment on the HAP for the amount owed back to HUD
- The HAP should also have a miscellaneous adjustment for a positive amount to offset the amount taken back

Voucher Reporting

- The negative adjustment in the retro adjustment section of the HAP should match the positive adjustment created in the miscellaneous section unless there is a notation explaining the difference
- The miscellaneous adjustment should include the tenant's name, unit number and reason for adjustment
  - Ex. Reversal of adjustment due to repayment agreement

Voucher Reporting

<u>Common reasons the positive and negative adjustments do not match:</u>

- There is a certification missing that needs to be submitted
- The adjustment period may be different and may not include all the certifications submitted
- The Tenant may have a credit on their account and so the positive adjustment may be less than the negative

Voucher Reporting

- As the tenant makes monthly payments per the Repayment Agreement, the O/A must enter them as a negative (OARQ) miscellaneous accounting adjustment on the HAP to pay back the money to HUD
- If the O/A is deducting his/her costs from the payment received from the tenant, the OARQ Miscellaneous Account Request will be for the amount collected from the tenant less the O/A's costs
- O/A must include a comment indicating amount retained by the O/A

Unreported Income Question

We find that tenants are working, but didn't notify the site.

- What happens if, after the site approaches them on their employment status, they move?
- What are the responsibilities of the site?
- Is there some way the site can let other HUD properties know this?

NTHDC EIV Training

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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
- When there is a change in Owner or Agent: O/A has 90 days to obtain access and begin using EIV

EIV Requirements Overview

Owner/Agents are required to:

- Have and maintain full access to EIV
- Maintain all required EIV forms and 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

What Documents are Required?

- Authorization letter from project owner for individuals to access EIV on the owner's behalf.
- EIV Coordinator Access Authorization Forms
- EIV User Access Authorization Forms
- Rules of Behavior - signed by each person who does not have access to the EIV system but has access to the information obtained from the system
- Documents to support annual Security Awareness Training has been completed

What Documents are Required?

Policies and Procedures to include:

- How to use EIV employment and income data as 3rd party verification at the time of each AR and IR, and within 90 days after MI or IC 50059 submission
- How and when to use each of the Income Reports and each of the Verification Reports available in EIV
  - Running each of the EIV reports; following up on discrepancies; how/where to maintain the data
  - The frequency at which each report is to be run must be outlined
- Notification requirements and timeframes for members who turn 18 to sign the 9887/9887A

What Documents are Required?

Policies and Procedures to include:

- Security Policies and Procedures to maintain EIV data in accordance with the Privacy Act
  - EIV Security Procedures must include:
    - (1) Authorized use of the EIV system
    - (2) How to handle security breaches
    - (3) Destruction of EIV data

Note: Once required retention period expires, O/A must dispose of the EIV data

- Master File reports 3 years after the date of the report
- tenant file reports 3 years after termination of tenancy

Security Awareness Training

To complete online Security Awareness Training:

- http://iase.disa.mil/eta/index.html#onlinetraining
- Click on **CyberAwareness Challenge (for DoD and Federal Personnel)** icon on the IA Education, Training and Awareness screen
- Click on Launch **CyberAwareness Challenge Federal Version** to proceed with the training

Note: The Security Awareness Training described above is the same training required for those individuals who transmit TRACS files. If the training has been completed to satisfy TRACS security training requirements, this will also satisfy EIV security training requirements as well provided the completion date represented on the *Certificate of Completion is not older than one year.*

Consent for the Release of Information

Tenants

- EIV data of an adult household member may not be shared (or a copy provided or displayed) with another adult household member or to a person assisting the tenant with the recertification process, unless the individual has provided written consent to disclose such information

Consent for the Release of Information

Disclosure to Persons Assisting Tenants with the Recertification Process

- With the written consent of the tenant, EIV data may be shared with persons assisting the tenant with the recertification process

- Tenants who require assistance during the recertification process may have someone present to assist them in the recertification process; this includes review and explanation of the written third party income verifications…

Consent for the Release of Information

Disclosure to Persons Assisting Tenants with the Recertification Process

- Disclosure of EIV information to these parties must be employment or income information pertaining only to the tenant who has provided his/her consent
- These parties must not have access to EIV information for any other household members

Consent for the Release of Information

Parties to whom the tenant can provide written consent include:

- Service coordinators (only if they are present at and assisting the tenant with the recertification process)
- Translators/Interpreters
- Individuals assisting an elderly individual or a person with a disability
- Guardians
- Powers of Attorney
- Other Family Members

Retention of EIV Reports

Reports used for third party verification such as:

- SS Benefit Reports
- New Hires Detail Reports
- Wage and unemployment Income Reports

Must be retained in the tenant file for tenancy and three years after. This also applies also to any documentation gathered in any EIV discrepancy report, multiple subsidy report etc.

Retention of EIV Reports

To be retained in a master file:

- New Hires Summary Report
- Identity Verification Reports
- Multiple Subsidy Report
- Deceased Tenant Report

Once the retention period has expired,
dispose of the data in a manner that will prevent any unauthorized information e.g., burn, shred etc.

Questions???