

EIV



EIV

- ▶ Public Housing via PIC
- ▶ Multifamily via TRACS
- ▶ Social Security Administration
- ▶ National Directory of New Hires

Prepared by the Denver Office of Public Housing
for the 2010 Sustainable Homes and
Communities Practitioner Training



TRACS/SSA/NDNH



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EIV



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Mandatory use of EIV effective January 31, 2010.

- ▶ Owners and Agents must use EIV system in its entirety.
- ▶ All recertifications with an effective date of June 1, 2010 (annual and interim must reflect the use of EIV)
- ▶ Purpose to reduce administrative and subsidy payment errors in accordance with HUD administrative guidance.

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Reports

Summary Report

Income Report

Income Discrepancy Report

No Income Report

New Hires Report

Identity Verification Reports (Failed EIV Pre-Screening Report and Failed Verification Report)

Existing Tenant Search

Multiple Subsidy Report

Deceased Tenants Report

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Summary Report

- ▶ Must be used at recertification annual and interim.
- ▶ Provides identity verification status “verified” or “Failed”.



The Income Report

- ▶ The Income Report displays benefit and wage-related information
- ▶ Required in the file for all recertifications Annual and Interim.
- ▶ Review within 90 days after transmission of move-in 50059.
 - SS/SSI/Dual Entitlement benefit Information from SSA/Medicare premium information
 - Wage, unemployment compensation, and new hire (W-4) data

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Income Report Cont'd

- ▶ Medicare Premium Information
- ▶ When the Medicare Premium is being paid by the state or another entity
 - The amount of the premium should not be included in annual income or as a medical expense
 - There will be a “Y” in the buy-in column and the date when the 3rd party started paying the tenant's Medicare premiums.
- ▶ Supplemental Insurance (such as Secure Horizons not on EIV)

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Income Report Cont'd

- ▶ Medicare Premium Information
- ▶ When the tenant is paying their Medicare Premium the gross benefit and the net benefit will be different.
- ▶ The premium is being deducted from their social security.
- ▶ The premium is used as a medical expense.
- ▶ Medicare premium generally \$96.40 or \$110.50

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Income Report Cont'd

- ▶ Prescription drugs premiums or garnishments information is not in EIV.
- ▶ Owners and agents need to request a current Award Letter from SSA.

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Income Report Cont'd

- ▶ National Directory of New Hires (NDNH)
- ▶ W-4 data for new hires
- ▶ Quarterly wages (federal and non-federal)
- ▶ Quarterly unemployment compensation

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Income Report Cont'd

- ▶ Applicants
 - EIV only contains employment and income data for current tenants.
 - O/As must request third party verification directly from the employer or have the tenant request a current Award Letter from SSA to determine the applicant's income for eligibility and rent purposes

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Income Discrepancy Reports

- ▶ A tool
- ▶ O/A must investigate all discrepancies
- ▶ Determine if it is a valid discrepancy.
- ▶ Resolve within 30 days
- ▶ Print at the time the as reports may change.
- ▶ Retain the report along with details on the resolution of the reported discrepancy.



Income Discrepancy Reports

- ▶ Lists households whose income reported on EIV is \$2,400 or more than the income transmitted to TRACS.
- ▶ O/A will need to identify any unreporting or underreporting of income by the tenant on current or historical HUD-50059s. (back five years as stated in 9887)

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Income Discrepancy Reports

- ▶ **Period Of Income for Discrepancy Analysis**
- ▶ **EIV Reported Annual Wages and Benefits V effective date of the form HUD-50059**
- ▶ **Is it covering the same period of time?**



No Income Report

- ▶ Provides a list of tenants whose identity was verified but tenants did not receive or have never received SS/SSI benefits from SSA or wages or unemployment compensation insurance, as provided by HHS' NDNH database.

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New Hires Report

- ▶ Provides a list of households where at least one member has new hire (W-4) record that was received by EIV in the last 180 days.
- ▶ Shows employment information for tenants who have started new jobs.

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The Failed Verification Reports \ Pre-Screening and Failed Verification

- ▶ Provides information on family members in a household due for re-certification for whom SSA was unable to verify the SSN, Last Name, and DOB combination that was derived from TRACS.
- ▶ EIV does not display data (SSA benefits data or HHS' NDNH Income data) for tenants whose IDs could not be verified by SSA.

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Existing Tenant Search

- ▶ Option to search by SSN and show whether an individual is receiving housing subsidy in any Public Housing or Multifamily Housing Program
- ▶ Must be included in the Tenant Selection Plan that O/A will be using the Existing Tenant Search.

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Multiple Subsidy Report

- ▶ Option to search tenants who receive assistance in more than one subsidized program

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Deceased Tenants Reports

- ▶ Option to show information at the Project and Subsidy Contract level of the number and household/ member information of households with deceased household members.

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NDNH Income Information in EIV

- ▶ The NDNH income information in EIV is not to be used to calculate the tenant's income without obtaining acceptable documentation from the tenant to support the wage and unemployment income in EIV. (pay stubs, unemployment benefit information)
- ▶ Make copies of tenant provided documents.
- ▶ Retain the report and supporting documents.

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Social Security Benefits

- ▶ If the Social Security Benefit information in EIV agrees with the amount the tenant reports he/she receives, the O/A may use the EIV information as third party verification and for calculating the tenant's income

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Social Security Benefits

- ▶ If the information in EIV does not agree the O/A must request that the tenant obtain a current Award Letter from SSA.

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When 3rd Party is required

- ▶ The tenant disputes the EIV data
- ▶ The tenant is unable to provide O/A with acceptable and current income documentation
- ▶ There is incomplete EIV data for the tenant
- ▶ There is not EIV data for a tenant

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Repayment Agreements

- ▶ The tenant is required to reimburse the owner for the difference between the rent he/she should have paid and the rent he/she was charged.

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Repayment Agreements Cont'd

▶ Must

- Include the total retroactive rent amount owed, the amount of the lump sum paid, and the monthly payment amount.
- Reference the paragraphs in the lease whereby the tenant is in non-compliance and may be subject to termination of their lease.
- Contain a clause whereby the terms of the agreement will be renegotiated if there is a decrease or increase in family income.
- Include the statement on 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 default of the repayment agreement and may result in termination of assistance and/or tenancy.
- Be signed and dated by the tenant and the O/A
- O/A's must not apply the a tenant's monthly rent payment towards the repayment amount owed that would result in accumulation of late payments.

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Investigating and Resolving Income Discrepancies

- ▶ Must investigate discrepancies of \$2,400 or more.
- ▶ Must investigate all possible errors that may result in underpayment or overpayment of subsidies.
- ▶ O/As may not suspend, terminate, reduce, make final denial of rental assistance or take any other adverse action against an individual based on EIV data.
- ▶ When the employment income data in EIV is not the same as reported by the tenant, or when the tenant disputes the EIV data O/A must independently verify any information by obtaining 3rd party verification or current Award Letter from SSA.

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Investigating and Resolving Income Discrepancies cont'd

- ▶ Request the tenant may come in within 10 days to discuss the results.
- ▶ Follow guidance in Chapter 8 for termination. If it applies.
- ▶ When fraud is suspected contact Office of Inspector General.



Investigating and Resolving Income Discrepancies cont'd

- ▶ The O/A must notify the tenant of the results of the third party verification and request the tenant come into the office to discuss the results
- ▶ If the O/A determines that the tenant had unreported income: go back to the point in time the unreporting or under reporting not to exceed five years and calculate the amount the tenant owes.
- ▶ A record of this calculation should be provided to the tenant and retained in the tenant's file.

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Completing MOR Report

MOR Findings

1. O/A does not have access to EIV
2. O/A is not using EIV for recertifications (annual and interim) effective June 1, 2010.
3. Missing/incomplete EIV documents
 - a) EIV Coordinator Access Authorization Form(s) (signed original copy and current copy)
 - b) EIV User Access Authorization Form(s) (signed original copy and current copy) for each user
 - c) EIV Owner Approval Letter(s)
 - d) EIV Rules of Behavior (for individuals without access to the EIV system)
 - e) EMAIL HUD Headquarters immediately Terminate use
4. Rules of Behavior for non-system users missing where applicable.

Completing MOR Report

MOR Findings cont'd

- 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
 - a) review the secure environment of the office
 - b) Printers
 - c) Cabinets
 - d) Doors



Completing MOR Report

MOR Findings cont'd

- 7) **O/A has not updated Policies and Procedures to include EIV use**
- Safeguards (Physical, Technical)
 - Administrative Safeguards (rights, roles, etc)
 - Handling of EIV data
 - Disposal of EIV data
 - Training
 - Notification requirements and timeframes for tenants who turn 18 between annual recertifications to sign the HUD-9887/9887-A Consent Forms

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Completing MOR Report

MOR Findings cont'd

7). O/A has not updated Policies and Procedures to include EIV use Cont'd

- Use of all other EIV reports must be addressed in the O/A's policies and procedures Policies and procedures must be established to govern the use of the EIV system.



Completing MOR Report

MOR Findings cont'd

- 8) O/A has not updated Tenant Selection Plan to include use of Existing Tenant Search
- 9) EIV Income Reports are not in tenant files as third party verification (annual and interim recertifications)
- 10) Tenant files do not have documentation to support EIV income discrepancy resolution
- 11) O/A is not using Existing Tenant Search Report (for applicants)

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Completing MOR Report

MOR Findings cont'd

- 12) O/A is not reviewing New Hires Report. (no less than quarterly)
- 13) Unresolved Identity verification Reports SSA identity test(no less than Monthly)
- 14) Deceased tenant report is not being reviewed and errors corrected. (no less than quarterly)
- 15) Multiple Subsidy Report has not been reviewed and errors corrected (no less than quarterly)
- 16) O/A is not following HUD's record retention requirements (term of tenancy plus 3 years)

Completing MOR Report

MOR Findings cont'd

- 17) Missing/Incomplete for HUD 9887
- 18) O/A is not providing the EIV & You brochure at move-in stage and recertification
- 19) Individuals with access to EIV system or EIV date have not completed annual Security Awareness Training
- 20) Owners/Agents sharing access IDs and passwords



Penalties for not having access/or not using the system

- ▶ If the O/A did not receive access by Jan 31, 2010.
 - 5% decrease in voucher payment
 - Flag in APPS
 - If the O/A does not cure within 30 days of the report date
 - Flag will be removed when finding is cured
 - CA must monitor to ensure voucher adjustment is made
 - Once Owner Agent Cures finding the O/A must make an adjustment to recoup the penalty
 - The 5% deduction is only for the month following the date the violation was found. This deduction is to be returned after the violation is cured, even if the finding is not cured within 30 days.



Helpful Links

- • Multifamily Housing EIV web site:
http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/eivh_ome.cfm
- • Enterprise Income Verification (EIV 8.0) System User Manual for Multifamily Housing Program Users
http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/user_manual.pdf
- • Rental Housing Integrity Improvement Project (RHIP) website
http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/eivh_ome.cfm
- • Resolving Income Discrepancies Between Enterprise Income Verification (EIV) System Data and Tenant-Provided Income Information”
http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/eivh_ome.cfm
- • Handbook 4350.3 REV-1, *Occupancy Requirements of Subsidized Multifamily Housing Programs*
http://www.hud.gov/offices/hsg/mfh//rhiip/eiv/eivh_ome.cfm

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Helpful Links

- EIV Multifamily Help Desk, Telephone: 202-708-7588
- Email: Mf_Eiv@hud.gov
- EIV Training conducted on June 27 and June 28, 2007
<http://www.hud.gov/webcasts/archives/multifamily.cfm>
- EIV Training provided to HUD RHIP Help Desk Representatives and Contract Administrators on March 22, 2008 and April 20, 2008
<http://www.hud.gov/offices/hsg/mfh//rhiip/mfhrhiip.cfm>
- Slide Show EIV Training
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivtraining.cfm>

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