

# **PAHMA** Sample Policy

## **EIV POLICY AND PROCEDURE**

**SAMPLE**

**ADOPTED BY PAHMA BOARD OF DIRECTORS**

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The Board of Directors of PAHMA provides the following sample as a service to aid owners and management agents in implementing and complying with HUD requirements. PAHMA is not advising that using this sample document will insulate the users from liability or assure compliance. Review or approval by HUD, the Pennsylvania Housing Finance Agency (PHFA) or other contract administrator or regulatory agency has not been obtained or requested. Owners and management agents may want to review the HUD regulations, HUD occupancy handbook, and this sample document, or have them reviewed by another party, prior to implementation. Owners and management agents are responsible for having policies that are specific to each property. PAHMA provides no warranties.

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## Purpose

The Enterprise Income Verification (EIV) system serves as a central repository and source for income and benefit data, securely accessible over the internet to improve the accuracy of rent and income determinations. The EIV system streamlines the verification process, minimizes the need for third-party verification to reduce errors in determining a tenant's income, thereby reducing the number of improper payments in Multifamily Housing's rental assistance programs. This policy provides instruction and information on the acceptable use, disposition, and storage of data obtained through the EIV System. Effective January 31, 2010, Owners and Management Agents (O/As) must use HUD's EIV system in its entirety.

## Policy

The EIV system can be used to identify the following:

- Applicants currently receiving HUD assistance
- Quarterly Earned Income, Social Security Benefits, and Unemployment Compensation benefit amounts
- New employment
- Multiple subsidy for household members in Public and Multifamily housing
- Deceased household members

Standard third-party verifications will be used when necessary, i.e., to verify income if the EIV system is not available, if EIV data does not match tenant reported amounts, if no information is available in the EIV system, and to verify data not included in the EIV system.

EIV information is confidential and will only be used for the intended purpose of verifying employment and income by O/As and agents, monitoring and oversight by HUD staff and Contract Administrators, for determining compliance by Independent Public Accountants, by OIG investigators for auditing purposes, and by individuals who are assisting in the recertification process and for whom the tenant has signed a release of information consent form authorizing disclosure, and with written tenant consent for Service Coordinators only if they are assisting in the recertification process and are present during the recertification interview.

EIV data will not be shared with governmental entities not involved in the recertification process for HUD's assisted housing programs, e.g., the Low Income Housing Tax Credit Program (LIHTC) and Rural Housing Section 515 program. To prevent disclosure, EIV data will not be kept in files for tax credit or rural housing projects, but will be kept in a separate file.

The EIV data is subject to the provisions of the Federal Privacy Act of 1974 and the associated penalties. As such, the 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 re-certification process, unless the individual has provided written consent to disclose such information. Penalties for willful unauthorized disclosure are a felony conviction and a fine up to \$5,000 or imprisonment up to five (5) years as well as civil penalties. Willful unauthorized

inspection is a misdemeanor penalty of up to \$1,000 and/or one (1) year imprisonment, as well as civil penalties.

## **Consent for the Release of Information**

A current form HUD-9887, Notice and Consent for the Release of Information, and HUD-9887a, will be signed by all applicants and tenants of the household 18 years and older, and on file before accessing information on the EIV System. Any tenant under the age of 18 in between annual re-certifications, will be required to sign the HUD-9887/9887a within 30 days of turning 18 years of age.

## **Assuring Tenant Privacy**

Whenever O/A requests information about a tenant, the following procedures are required:

1. The income data is only used for verification of tenant income to determine the level of assistance that they are entitled to receive.
2. Information is not disclosed in any way that would violate the privacy of the individual represented in the system or another adult household member.
3. Information is only disclosed to O/As administering the program, Contract Administrators and HUD Staff for monitoring and oversight, IPA hired by the O/A to perform a financial audit, OIG Investigators for auditing purposes, and individuals such as translators/interpreters, persons assisting an elderly individual or a person with a disability, guardians or Power of Attorney having written consent to be present during the recertification process, and Service Coordinators with tenant consent, only if they are present at, and assisting the tenant with the recertification process.
4. EIV data of an adult household member will not be shared with another adult household member nor will it be shared with a person assisting another household member with the recertification process unless the individual has provided written consent to disclose such information. However, the head of the household will not be prohibited from being shown how, or from participating in discussions pertaining to how, the household's income and rent were determined based on the total income reported and verified. See HUD Notice H 2011-21, Attachment 10 and HUD Handbook 4350.3 REV-1, Change 4, Chapter 9, Exhibit 9-4. – "Sample Tenant Consent to Disclose EIV Income Information."
5. The tenant is notified of the following:
  - a. HUD or O/A's authorization and purpose for collecting the information,
  - b. the uses that may be made of the data collected, and
  - c. the consequences to the individual for failing to provide the information.
6. Upon request in writing, the tenant is provided access to records pertaining to them and an opportunity to correct or challenge the contents of the records.
7. Information will not be shared with government entities not involved in the recertification process for HUD's assisted housing programs.

## Roles

Owner: Appoints the EIV Coordinator, may also be the Coordinator, and must provide a written approval letter for the EIV Coordinator and users, which is maintained at each property/site for which the EIV Coordinator is responsible.

Coordinators must:

- complete a Coordinator Access Authorization Form (CAAF) and be certified at initial access and annually thereafter
- participate in security training and complete the Security Awareness Training Questionnaire upon initial access and annually as described in HUD Notice H 2011-21
- provide each proposed user a HUD User Access Authorization form (UAAF), the Rules of Behavior, and User Agreement/Security Awareness Training Questionnaire
- after approval of user, assigns properties/contracts
- maintain a log of all authorized users updated on a quarterly or more frequent basis
- monitor Coordinator Certification Report to notify all EIV users of time to certify
- Certify all EIV users at the time of initial access to EIV and bi-annually, thereafter
- conduct staff training and maintain a log of all personnel who have attended
- perform a review of the EIV security procedures on a regular basis but not less than annually
- distribute user guides and security procedures to personnel using the EIV system data
- ensure that all authorized users are utilizing and safeguarding the EIV information, including but not limited to confidentiality of information displayed on monitors/CRTs, printed EIV reports, file storage, and disposal of EIV information
- remove a user's access when they are no longer employed by O/A or no longer require access
- record and report improper disclosure

EIV External Users must:

- be a staff member of the O/A, approved by the Owner, and authorized to access EIV
- have a WASS User ID and password for accessing the EIV data
- update their passwords in accordance with HUD EIV requirements
- never share user ID or password with another individual
- complete the User Access Authorization Form (UAAF), including the Rules of Behavior
- be certified by the Coordinator at initial access and bi-annually thereafter
- participate in security training and complete the Security Awareness Training Questionnaire upon initial access and annually thereafter as described in HUD Notice H 2011-21

Users without Access must:

- sign EIV Rules of Behavior
- receive security training annually as described in HUD Notice H 2011-21

IPA's must:

- only access EIV income information within hard copy files and only within the offices of the O/A
- not transmit or transport EIV income information in any form
- not enter EIV income information on any portable media
- sign Rules of Behavior for non-system Users agreeing that EIV information will only be used for the purpose of the audit
- not duplicate EIV income information or disclose to any user not authorized to have access to the EIV income data

Internal Users must: (HUD/Contract Administrators/IG Staff)

- be provided access for monitoring, oversight and/or auditing purposes

## **Documentation to be Maintained**

The following documents related to EIV access, authorizations or security must be maintained at each property and available for audit purposes:

- EIV Coordinator Access Authorization Form(s) (signed original copy and current copy)
- EIV User Access Authorization Form(s) (signed original copy and current copy)
- EIV Owner Approval letter(s)
- EIV Security Awareness Training Questionnaire for all users
- Rules of Behavior for staff, service bureau staff (if applicable), and IPAs.

The following documents related to EIV access, authorizations or security must be maintained at each property in a Master File and available for audit purposes:

- No Income Report (not required, however recommended), New Hires Summary Report, Multiple Subsidy Report, Failed EIV Pre-screening Report, Failed Verification SSA Identity Test Report, and Deceased Tenant Report

## **Disclosure of EIV System to Tenant**

At move-in and thereafter at each certification, O/A will disclose at the tenant briefing to the prospective resident or housed resident its intent to use the EIV system. This will include the following:

1. distribution of the HUD EIV and You Brochure
2. an explanation of EIV procedure
3. an explanation of how income discrepancies are identified, their effect on rent calculations, and the penalties for committing fraud by not disclosing accurate income information
4. an explanation of how discrepancies can be resolved

5. what remedies O/A may seek after determining that income has been unreported or underreported
6. that prior to obtaining income reports, tenant must authorize by signing the consent form HUD-9887/9887a; retain properly executed HUD-9887/9887a forms in tenant file
7. that to protect privacy, all EIV data will be kept in a secure environment and will be disposed of by burning or shredding as specified in the disposal section of this policy

## Security

EIV data will be safeguarded at all times as follows:

Electronic Data:

- will be stored in a restricted access directory
- will be labeled and encrypted using a NIST compliant vendor if placed on portable media
- will not include the full nine-digit SSN for a tenant
- on monitors or CRT's will only be active when the EIV data is in use and only when no unauthorized person is within viewing distance. EIV User must exit the Secure Systems if they need to walk away from their computer during the use of the system
- included in emails will be encrypted using a NIST compliant vendor, printed and then deleted from the recipients e-mail box

Printed and Faxed Reports with EIV information will:

- be promptly removed from printer trays, if possible use a restricted printer, copier or fax machine
- not be left unattended, ensure there is someone waiting and ready to receive the fax as it is received or printed
- when mailing EIV data, the data must be sent to an office of the O/A. EIV data must not be mailed to Independent Public Auditor offices
- not be left within viewing distance of unauthorized personnel or visitors
- be properly filed in a secure filing cabinet
- be properly disposed of through shredding or burning

Filing - EIV Reports will be kept in locked cabinets and may be filed in:

- EIV master file(s)
- tenant files *with the exception of Tax Credit and Rural Development*, which will not contain EIV data

Discussing EIV Information:

- EIV information is protected at the individual level; and
  - EIV information will only be discussed with others on a “need-to-know” basis.
8. Specific EIV data pertaining to an adult family member will not be shared, or a copy provided or displayed to another adult household member or to a person or family members assisting the tenant with the re-certification process unless the individual has provided a written consent to disclose this information. Service Coordinators with tenant consent must be present at, and assisting the tenant with, the recertification process.

Disclosure of the EIV information to these parties must be income information pertaining to the tenant who provided the release, and not another household member's information. See HUD Notice H 2011-21, Attachment 10 and HUD Handbook 4350.3 REV-1, Change 4, Chapter 9, Exhibit 9-4. "Sample Tenant Consent to Disclose EIV Income Information."

- The head of household will be shown how the household's income and rent were calculated based on the total reported/verified family income.
- All Tenant Privacy requirements above must be followed.

**Disposal:**

- EIV data will be disposed of by either crosscut shredding or burning.
- EIV data from tenant files will be disposed of three years after move-out.
- EIV data attached to applications will be disposed of three years after rejection.
- The Master File will be documented with the type of record destroyed, name of employee that destroyed the record, method used to destroy, and time and date it was destroyed.

**Use of EIV Reports** – *Effective January 31, 2010, it is mandatory that O/As use the following EIV Reports:*

**Income Reports:** When selecting the Income Report for an individual tenant, there are three reports that must be used at the time of re-certification (annual and interim), Summary Report, Income Report, and Income Discrepancy Report.

1. **Summary Report** – This report provides a summary of information taken from the current, active certifications contained in the TRACS file at the time of the income match. The Summary Report is required to be printed and a copy must be retained in the tenant file. The O/A must also document the tenant file for any household members not required to disclose and provide verification of a SSN as per Notice 10-10, Section VII.A.1.c(3). The O/A must use this report:
  - at the time of re-certification to review and resolve the status of any household member(s) with a "failed" or "deceased" status. O/As do not have to do anything at the time of re-certification when the status is "Not Verified." However, the O/A must check the Failed SSA Identity Test report monthly as changes in the Identity Verification Status may occur. If the status is "failed" or "deceased" O/A must take all necessary actions to resolve this discrepancy and correspondence or documentation received will be maintained in the tenant file.
  - as verification that a tenant's SSN has been "Verified" by SSA as being a valid SSN. If the Summary Report shows an Identity Verification Status of "Verified" for all household members required to have an SSN, the report does not have to be printed at subsequent re-certifications unless there is a change in the household or identity verification status.
2. **Income Report** is used at Annual and Interim recertification and within 90 days after transmission of move-in certification to TRACS to confirm/validate income reported by

the household. The report contains Social Security benefits, Supplemental Security Income benefits, Dual Entitlement benefits, Medicare premium information, and Disability status from Social Security Administration (SSA) and new hires (W-4), quarterly wages, and quarterly unemployment compensation benefits from the National Directory of New Hires (NDNH). Data will not be accessed until after execution of form HUD-9887 and HUD-9887a by the O/A and each household member age 18 and over.

For Social Security benefits: A copy of the printed report will be placed in the tenant file as third-party verification of gross benefit and if applicable, the Medicare premium paid by the tenant will be included in the medical expense deduction. The income report will be used to calculate the tenants Social Security, SSI and SSA income and Medicare expense.

O/A will request that the tenant provide the benefit letter as third-party verification:

- if the tenant disputes the amount of benefits, or
- the benefits data does not agree with what the tenant reported, or
- the data is not included in EIV

If the tenant does not have the letter or it is not dated within 120 days of recertification, the preferred method to obtain the Proof of Benefit Income Letter is to request the information using SSA's web site. O/A may assist the tenant by going to the SSA website: <https://secure.ssa.gov/apps6z/BEVE/main.html> or a request for Proof of Income Letter can be made by calling the SSA's toll-free number 1- 800-772-1213. If there are any errors in the EIV data, O/A will advise the tenant and inform them that it is their responsibility to contact the SSA to get the information corrected.

For New Hire, Wage and Unemployment Compensation: The employment and unemployment income information will be used ONLY as third-party verification of employment and will **not** be used to calculate income. If the EIV information agrees with the information provided by the tenant (four current consecutive pay stubs to annualize employment income or an official benefit letter from the unemployment office):

- it will be used for third-party verification of employment and a copy placed in the tenant file; and
- O/A will request that the tenant provide documentation to support their current income amount.

Third-party verification will be requested directly from the employer:

- if the EIV data does not agree with what the tenant reports, or
- the tenant disputes the data, or
- the information is incomplete (such as no start date), or
- no employment or income information is available in EIV but the tenant reports they are working.

If it is determined that the EIV data does not belong to the tenant:

- the O/A will advise the tenant
- attempt third-party verification from the employer
- have the tenant certify that the data is invalid and has been wrongly attributed to them
- advise the tenant to contact the third-party who provided the information and if unsuccessful, the State Workforce Agency to have that employer or agency remove the invalid income information from the records

Tenant files will include the EIV income report, supporting documents to verify current income received, and the efforts to verify disputed income information, the signed tenant certification when income is disputed, and tenant notification to contact third-parties and State Workforce Agency.

**3. Income Discrepancy Report** – This report shows differences between EIV and reported income when that amount exceeds \$2,400. O/A will run this report at the same time as the Income report (as the data is updated and overwritten weekly) at the time of annual or interim recertification to resolve any discrepancies. O/A will follow-up on every reported income discrepancy included in this report at the time of recertification or within 30 days of printing the Income Report date. The tenant file will be documented with the EIV report and verification documentation along with detailed information on the resolution of the reported discrepancy, regardless of whether the discrepancy was found to be valid or invalid. O/A will determine whether the income appearing on the EIV Income Discrepancy Report should be included as income and does not meet one of the income exclusions represented in Exhibit 5-1 of HUD Handbook 4350.3 REV-1, Change 4. While O/A investigates and confirms possible discrepancies and errors, no adverse action will be taken based solely on the data in EIV.

If it is determined that the information in TRACS differs from the information found on the tenant's current HUD-50059, the O/A will retransmit the current HUD-50059 to correct the TRACS database.

When the data in EIV is disputed by the tenant or does not match the information provided by the tenant, information will be obtained independently directly from the third-party source. O/A will provide the tenant with results and request a meeting within 10 days of notification to discuss. If it is determined that the tenant is in non-compliance with the lease for knowingly providing incomplete or inaccurate information, the guidance in Chapter 8, Section 3 of the Occupancy Handbook HUD-4350.3 REV-1 will be followed to begin actions to terminate tenancy. Where fraud is suspected, the owner may report this to the HUD OIG Office of Investigation.

If the tenant has unreported or underreported income, O/A will go back to the time the unreported or underreporting of income started not to exceed 5 years. A calculation of rent/subsidy adjustment will be made comparing the actual third-party verified information against the executed 50059s in the tenant file. O/A will not collect for unreported or underreported income without historical information (50059s). A record of the calculation of what the tenant should have paid and the amount of rent the tenant was charged will be provided

to the tenant and retained in the tenant's file. Tenants may also be required to repay funds to the O/A due to a civil action taken by the O/A, or Court action as a result of an OIG audit.

**Repayment Options:** Tenants who do not agree to repay amounts due are in non-compliance with their lease and subject to termination of tenancy. Tenants can repay in a lump sum, or enter into a repayment agreement, or a combination of both. The repayment agreement must include the following:

- terms must be agreed upon by both tenant and O/A
- will not require a monthly repayment amount plus the tenant rent amount that exceeds 40% of the family's monthly adjusted income, unless the tenant chooses to repay at a higher rate. If the tenant chooses to repay at a higher rate, the file must be documented that the tenant chose to pay at a higher rate, and the amount is stated in the repayment agreement
- will include the time period for repayment by the tenant of the amount owed
- will include the total retroactive rent amount owed, the amount of the lump sum paid at the time of execution of the agreement, if applicable, and the monthly payment amount
- will 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 missing payments constitute default of the repayment agreement and may result in termination of assistance and/or tenancy
- will reference the paragraphs in the lease where the tenant is in non-compliance and may be subject to termination of their lease
- will be signed and dated by O/A, the Head of Household and, if applicable, the family member who had the unreported or underreported income
- will include a clause regarding adjusting the payment for an increase or decrease in the family's income of \$200 or more per month
- will include a statement that O/A will not apply a tenant's monthly rent payment toward the repayment amount as that would result in an accumulation of late rent payments, if applicable

O/A will repay any funds collected from the tenant to HUD in accordance with the requirements of Chapter 8, Paragraph 21 of Handbook 4350.3 REV-1, Change 4 and HUD Notice: H-2011-21, issued July 1, 2010. O/A has the option of collecting the lesser of actual cost or 20% of the amount received from the tenant and depositing this amount in the operating account for the property to offset the expenses incurred.

If O/A finds at the time of recertification that the previous year's income for a family was less than what was used to calculate rent, O/A will discuss with tenant. If the tenant agrees, O/A will verify the amount through third-party verification. If the income is verified as having been less than the amount used to calculate rent, O/A will complete a correction to the prior certification and refund any overpaid rent.

## Other EIV Reports:

**No income report** – This report shows any current tenant who passed the identity match who has no income reported in the SSA or NDNH records. O/A must run this report no less than quarterly. When running the report, the O/A must select recertification month “All”. O/A will follow established procedures for zero-income tenants. While this report shows no income was found in the available databases, it is never used as documentation of zero income. O/A will document that tenant was asked about income during the interview and given the opportunity to disclose any income they receive.

**New Hires Report** – Provides employment information for tenants who have started new jobs within the last six months. O/A must run this report no less than quarterly. When running the report, the O/A must select recertification month “All”. After discussion with tenant, O/A will follow-up on any current tenant who has obtained employment since last certification. If the tenant agrees with the employment information, O/A will request documentation (four current, consecutive pay stubs, etc.) to determine income or if necessary will request third-party verification from the employer. If the tenant disputes the employment information, O/A will obtain verification directly from the third-party and will make appropriate rent/subsidy and effective date corrections. If the data is erroneous, O/A will recommend that the tenant contact the third-party who provided the information to make corrections to the system. O/A will follow the guidance in HUD Handbook 4350.3 REV-1, Change 4, Chapter 8, Paragraph 8-19, if fraud is suspected. In addition to repayment of overpaid subsidy, eviction may be necessary. Tenant file will be documented with the new hire detail report and all correspondence related to the investigation, including third-party verifications. The New Hires Summary Report along with notations as to outcome will be filed in the master file.

**Existing Tenant Search** – shows whether an applicant and any member of the applicant’s family is currently receiving HUD housing assistance. As noted in the Tenant Selection Plan, this search will be done during application processing and prior to occupancy. Subsidy will not be paid for the same family in two locations so this report will be used to coordinate with another location the move-out and move-in dates. The report results and any documentation obtained as a result of contacts with the applicant and other locations will be retained with the application. *Note: an executed 9887 – Notice of Consent is not required prior to running this report.*

**Multiple Subsidy Report** – This report is used to search within TRACS and Public and Indian Housing to identify individuals who may be receiving multiple subsidies. O/A must run this report no less than quarterly. O/A will discuss this with the tenant giving them the opportunity to explain any circumstances that created the multiple subsidies. If necessary, an investigation will be made for a current tenant who appears to be receiving multiple subsidies. Depending on the results of the investigation, O/A may need to take action to terminate a tenant’s assistance or tenancy. The Multiple Subsidy Summary Report will be filed in the master file along with notations as to the outcome of contact with the tenant and/or PHA or owner. If the multiple subsidy was resolved at the time of recertification, the summary report will be so noted and no further action is required. The Multiple Subsidy Detail Report will be filed in the

tenant file along with documentation of action taken. *Note: an executed 9887 – Notice of Consent is not required prior to running this report.*

**Failed EIV Pre-Screening Report** – This report shows any tenant who failed the identity match and the reason they failed. O/A must correct the error before the Social Security Administration (SSA) can match and transmit tenant information. This report will be run monthly. When running the report, the O/A must select recertification month “All”. O/A will verify and correct information on every tenant listed as having failed the pre-screening. A copy will be placed in the tenant file and the master file along with documentation of action taken to resolve invalid or discrepant personal identifiers. Since this report includes persons who are exempt from SSN disclosure, it will be so noted on the file copy and no further action is required. (Exempt from SSN disclosure: tenants age 62 or older as of 1/31/2010 whose initial determination of eligibility was begun before 1/31/2010 and persons who do not contend eligible immigration status.)

**Failed Verification Report** – This report shows family members with incorrect Social Security Numbers, date of birth, last name, as well as deceased household members. This report will be run monthly. When running the report, the O/A must select recertification month “All”. O/A will verify that the documentation in the tenant file matches the tenant’s personal identifiers. If an error has occurred, O/A will make the appropriate correction to the most recent certification. If there are inaccuracies, O/A will encourage the tenant to contact the Social Security Office to correct the information. A copy will be placed in the tenant file and the master file along with documentation of any action taken to resolve invalid or discrepant personal identifiers.

**Deceased Tenant Report** – This report provides information of any current tenant who is listed as deceased with the Social Security Administration. The report must be run no less than quarterly. When running the report, the O/A must select recertification month “All”. O/A will confirm in writing whether or not the person is deceased. Upon verification of death of existing tenant, O/A will remove the tenant from the household effective the first of the month following death. If deceased tenant is the only member of the household, tenancy will be terminated effective 14 days following death or when the family has removed all of tenant’s belongings and returned the keys, whichever date is earlier. Discrepant information must be corrected in TRACS within 30 days of the date of the report. If an error has occurred and tenant is living, O/A will encourage tenant to contact SSA to correct the error. The printed Deceased Tenants Report will be filed in the master file along with documentation of action taken to resolve discrepancies. All correspondence and/or action taken for a particular tenant must be retained in the tenant file.

**Caution-** Any detail report retained in a tenant’s file must contain information for members of the tenant’s household only. Many of the reports do not have page breaks between households, therefore, O/A will need to separate the reports by household.

## Penalties for Failure to Have Access and/or Use EIV

O/As will incur penalties for not accessing the EIV system by January 31, 2010, not submitting a CAAF to the MF Help Desk by December 15, 2009, not completing property assignment by January 15, 2009, not using EIV as of January 31, 2010, or are not using EIV at the time of the MOR.

### Penalties:

- will receive a finding on the MOR report
- will incur a penalty of 5% decrease in the voucher payment for the month following the date the violation was found and each subsequent voucher payment until the MOR finding is cured. See HUD Notice H 2011-21, Attachment 9, "Assessing the Five Percent Decrease in Voucher Payment." O/A must make the decrease adjustment on the voucher and the CA will ensure the adjustment is made. O/A has 30 days to cure. If not cured, the O/A will be flagged in HUD's Active Partners Performance System.

When there is a change in ownership or management, the new Owner/Agent must obtain access and begin using EIV within ninety days of possession. Failure to do so may result in the above penalties.

## Definitions

**Coordinator** – O/A's employee designated by the Owner who is responsible for authorizing access to WASS and designated to monitor and ensure Users' EIV compliance.

**Improper Disclosure** – The viewing or removal of EIV data by an unauthorized individual.

**Need-To-Know** – Criterion used in security procedures that requires the custodians of secure information to establish that the intended recipient must have access to the information to perform his or her official duties.

**Proper Disposal** – Disposal of EIV information by either burning or cross shredding.

**Secure System WASS User ID** – A secure ID issued to a user, enabling access to the system.

**User** – O/A's employee who Needs-To-Know the information and has been given WASS access.

**User without Access** – O/A's employee without WASS access who Needs-To-Know the information, HUD Staff and CAs for monitoring and oversight, IPAs when performing the financial audit to determine owner's compliance with verifying income and determining accuracy of rent/subsidy calculations and, OIG investigators for auditing purposes. NOTE: Some, but not all HUD staff/CAs are users.

**WASS** – HUD's Web Access Security System (secure connection/secure systems).

## References:

- HUD Notice H 2011-21
- HUD Notice H 2011-21 – Attachment 9: “Assessing the Five Percent Decrease in Voucher Payment”
- HUD Notice H 2011-21 – Attachment 10: “Sample Tenant Consent to Disclose EIV Income Information”
- HUD Handbook 4350.3, REV-1, Change 4, Chapter 9: ENTERPRISE INCOME VERIFICATION (EIV)

to access the references online Ctrl+Click on the following link:

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