

Sample Forms/Instructions Packet

EIV Training April 14, 2009

1. Sample Initial Letter
2. Sample EIV Owners Certification*
3. EIV Discrepancy Resolution Suggestions* (contains sample verbiage for use policy)
4. Sample EIV Security Policy*
5. Sample Privacy Policy*
6. Sample EIV Security Monitoring Checklist
7. Sample EIV Security Checklist
8. Sample EIV File Checklist*
9. EIV Income Discrepancy Checklist
10. Sample Documentation of EIV Information*
11. EIV Quick Start Guide*
12. User Re-Certification Instructions*
13. EIV Notice to Residents*

Coordinator Access Authorization Form

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

User Access Authorization Form

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

HUD Security Awareness Training Questionnaire

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

**Thank you to Mary Ross of Ross Business Development for allowing us to use her sample forms and guidance. www.rbdnow.com*

<Date>

<Owner>

<Address>

<Address>>

RE: SECTION 8 MANAGEMENT & FHEO REVIEW
<Development Name/Number>

<Contact>:

The Compliance Department of Idaho Housing and Finance Association (IHFA) will be conducting a Management and Occupancy Review (MOR) of <Development> on <Date>, 2009. The review team, Norma Requist, Sara Dotson and Michele Baldwin will be at <Office/Development> at approximately <time> a.m. Please ensure that auditors have adequate workspace that will provide an appropriate level of confidentiality. An exit interview will be conducted at the end of the review.

The review will focus on the following areas:

- General Appearance and Security
- Follow-up and Monitoring of Project Inspections
- Maintenance and Standard Operating Procedures
- Leasing and Occupancy
- Tenant/Management Relations
- General Management Practices

Enclosed with a copy of this letter to the management company, is Addendum B, Part A, Sections I, II, and III for your review and completion. This information is used for HUD monitoring of compliance with Title VI, Subtitle D of the Housing and Community Development Act of 1992 and data collection for HUD's Multifamily Inventory of Units for the Elderly and Persons with Disabilities. Therefore, the information provided in these sections must be accurate and complete, including the owner's signature and certification.

Addendum B, Part A, Section I, II, and II must be completed in its entirety. (*Document must be signed by the owner.*) The form may not contain blanks; therefore a response is required for each question/section. More specifically, Section II must contain a number and may not be left blank. If the number in any column is zero, a zero must be entered.

Failure to complete the form in its entirety (including signatures) may result in a determination of noncompliance with HUD's fair housing and civil rights nondiscrimination requirements. Noncompliance with HUD's fair housing and civil rights nondiscrimination requirements may result in a referral to HUD's Office of Fair Housing and Equal Opportunity for enforcement action and a flag entered into the Active Partners Performance System.

Please complete this form and return it with the documents listed in the first portion of the attached checklist by <10 days prior to MOR>. Documents in the second portion of the attached checklist must be available on-site for our review. Your assistance in providing the requested items is greatly appreciated.

A random sampling of occupied units with level 2 and 3 findings from the last REAC inspection (if applicable) will be conducted. Please provide your tenants with the required notice.

We look forward to meeting with you. Should you have any questions, please contact me at (208) 331-
<ext>.

Sincerely,

<Auditor>
Housing Compliance Auditor

cc: <Management Agent>

IHFA Management Review Documentation Checklist

Please send copies of the following documents with the Completed Addendum B, Part A to HUD-9834

- _____ Wait List(s) for the last 12 months
- _____ Current application packet
- _____ Current Lease, Addendums/Attachments, House Rules, and Pet Policy
- _____ Application rejection letter
- _____ Copy of the Income Targeting Tracking Log
- _____ Affirmative Fair Housing Marketing Plan with current supporting documentation (*copies of most recent advertising and brochures, etc*) and 5 year review documentation (if applicable)
- _____ Tenant Selection Plan (Resident Selection Policy)
- _____ Copy of a police activity report for the property for the previous 12 months
- _____ Tenant Security Deposit Ledger
- _____ A listing of all staff billed to the development, including title, hours worked per month, salary/wage (*Note if an apartment is included as part of the compensation package, the size of the unit, insurance costs and/or other benefits*).

Please have the following items available for review on-site:

- _____ HUD Handbooks, Development Policies and Procedures Manuals
- _____ Current move-out files
- _____ Applications – current and rejected/removed
- _____ Work Order Journals/Logs
- _____ Copy of Inventory/Equipment Lists
- _____ Utility Allowance reimbursement documentation
- _____ Other: EIV Application Approval Documents (*Only applicable to developments with EIV access*)
 1. EIV Coordinator Access Authorization Form (*copy of signed initial CAAF and most current CAAF*)
 2. EIV User Access Authorization Form(s) (*copy of signed initial UAAF and most current UAAF*)
 3. EIV Owner Approval Letter(s)
 4. Security Awareness Training Questionnaire(s) (*for all users*)

EIV Coordinator Access Authorization from Owner

To The Departments of Housing & Urban Development

Date: _____ / _____ / _____

Re: Secure Systems Coordinator Access

I, _____ (the owner) am the owner of the properties listed below. I

authorize _____ (the coordinator) to act as the EIV Coordinator for the following contracts.

Property Name	Contract Number	TIN

PENALTIES FOR MISUSING THIS FORM

Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making false or fraudulent statements to any department of the United States Government, HUD, the PHA and any owner (or any employee of HUD, the PHA or the owner) may be subject to penalties for unauthorized disclosures or improper uses of information collected based on the consent form. Use of the information collected based on this verification form is restricted to the purposes cited above. Any person who knowingly or willfully requests, obtains or discloses any information under false pretenses concerning an applicant or participant may be subject to a misdemeanor and fined not more than \$5,000. Any applicant or participant affected by negligent disclosure of information may bring civil action for damages, and seek other relief, as may be appropriate, against the officer or employee of HUD, the PHA or the owner responsible for the unauthorized disclosure or improper use. Penalty provisions for misusing the social security number are contained in the Social Security Act at 208 (a) (6), (7) and (8). Violation of these provisions are cited as violations of 42 U.S.C. 408 (a) (6), (7) and (8).

Authorized Signature: _____

Print Name _____

Date Signed _____



File this letter with the HUD executed Enterprise Income Verification (EIV) System Coordinator Access Authorization Form and make sure it is available for review by HUD or your Contract Administrator.

Revised 3/1/2008

The Enterprise Income Verification System

How to Handle Discrepancies



Since Social Security and Income Discrepancies are no longer returned through the TRACS System, owner/agents are challenged with developing policies to address Discrepancies in HUD's Enterprise Income Verification System. The following are suggestions for establishing an "EIV Discrepancy Handling Policy".

No Information in EIV

If EIV does not provide income reports for a particular household, there are three potential reasons:

1. There is no match between Social Security and information in TRACS
2. The household failed the EIV verification
3. The household's last certification has not been recorded in TRACS

No Match Between Social Security and TRACS

In our experience, EIV provides information for about 70% to 80% of residents who are Social Security benefit recipients receiving HUD project-based assistance. This means that you will have to contact the Social Security Administration to obtain current benefit information.

If SSA will not provide you with the information, or charges fees that cannot be absorbed by the property, then you should ask your resident to request a recent copy of their benefit letter. Residents can request this information using the Social Security web site (www.ssa.gov) or by calling the Social Security Administration 800 number.

Household failed EIV verification

The first step in EIV verification is to match household members' Social Security Number, Last Name and Birth Date. If any of these items fails to be "verified", EIV will not retrieve income information. The household information will appear in the "Failed Verification Report". Managers should monitor the Failed Verification Report to make sure that residents are providing accurate information and that the information is entered correctly on the 50059.

Example

Property Manger creates Move-in 50059 for a new household – Davey Jones. The head of household name is inadvertently keyed in as Davey Jonas. The last name Jonas will not match Davey Jones' Social Security Number or Birth Date. This will result in Failed Verification.

The property manager must correct the Move-in 50059, obtain new resident signatures, and submit the corrected certification to TRACS. ("Former HOH" fields should be completed to ensure TRACS accuracy) When TRACS receives the correction and EIV edits the 50059, there will be a match of the Last Name, Social Security Number, and Birth Date.

EIV will then provide relevant reports.

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The Enterprise Income Verification System

How to Handle Discrepancies



Last Certification Not Recorded In TRACS

Household information must be successfully recorded in TRACS in order for EIV to edit information on the 50059. EIV only returns information for active households.

If the household information is not included in the EIV income reports, and the household is not listed in the "Failed Verification" report, the next step is to check TRACS to make sure the last 50059 has been recorded.

If TRACS returned a FATAL message for the last 50059 submitted, that certification was not recorded in TRACS and, subsequently, the household information was not forwarded to EIV for edits. Property managers must correct all FATAL errors immediately.

In some cases, the 50059 was not recorded and there is no FATAL error in your TRACS Mailbox. You must determine what happened to the 50059 and make sure it is recorded in the TRACS query. If you are a Section 8 property manager and you have a Contract Administrator (CA), you must work with your CA to resolve the problem. If you do not have a CA, you must become familiar with the TRACS database to ensure that all transactions are recorded correctly.

Income Discrepancies

Owner/Agents should develop policies to check for income discrepancies **at least once a month**. EIV edits information when new certifications are submitted to TRACS (Move-in, annual, interim, initial and corrections to these). EIV also re-checks resident information every 90 days.

The reason EIV checks resident information every 90 days is to help owner/agents discover unreported changes in income that exceed \$2400 per year (\$200 per month). If household income increases by \$2400 or more, than EIV will list the household in the Income Discrepancy Report and owner/agents should investigate the difference by reviewing the income report for the household. Compare the information on the current 50059 with the information on the EIV Income report.

Income discrepancies can be caused when the resident:

- Receives an increase in Social Security Benefits of \$200 or more per month (for example resident starts receiving SSI)
- Becomes employed and household income increases by \$200 or more per month
- Obtains a new job and household income increases by \$200 or more per month or more
- Starts receiving unemployment insurance and household income increases by \$200 or more per month

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The Enterprise Income Verification System How to Handle Discrepancies

It is important that you follow HUD's guidance if an income discrepancy report indicates that a resident is receiving unreported income. You should notify the resident that HUD's systems have returned information that indicates that the resident has failed to report income. This should be done in compliance with HUD handbook 4350.3 Revision 1, Change 2, Paragraph 7-12-B

- B. "Owners must take the following steps upon learning that a tenant failed to report a change in income or family composition, as stated in the lease.
1. Tenant notification. *When owners learn that a tenant has experienced a change in family income or composition listed in paragraph 7-11 A, they must immediately notify the tenant in writing of his or her responsibility to provide information about such changes. The owner's notice must:*
 - a. *Refer the tenant to the lease clause that requires the interim recertification;*
 - b. *Give the tenant 10 calendar days to respond to the notice; and*
 - c. *Inform the tenant that his or her rent may be raised to the market rent if the 10-day deadline is not met."*

During the meeting, the owner/agent must obtain signatures on the documents required to verify the information provided by EIV. If appropriate, the owner/agent must submit a new certification reflecting the income difference. In some cases, the owner/agent will correct the existing certification. In other cases, an interim certification may be required. Effective dates of interim certifications should be determined using the guidance provided in HUD Handbook 4350.3 Revision 1, Change 2, Paragraphs 8-20 and 7-13 C & D

A. Tenant's Obligation to Repay

1. *The tenant must reimburse the owner for the difference between the rent the tenant should have paid and the rent he/she was actually charged, if the tenant:*
 - a. *Fails to provide the owner with interim changes in income or other factors;*
 - b. *Submits incorrect information on any application, certification, or recertification; and*
 - c. *As a result, is charged a rent less than the amount required by HUD's rent formulas.*
2. *The tenant acknowledges his/her obligation to make such reimbursements:*
 - a. *In paragraph 18 of the Model Lease for Subsidized Programs;*
 - b. *In paragraph 14 of the Model Lease for Section 202/8 or Section 202 PAC; and*
 - c. *In paragraph 12 of the Model Leases for Section 202 PRAC and Section 811 PRAC.*
3. *If the tenant does not pay in full, an owner should enter into a repayment plan with the tenant to collect these funds over a specific period of time.*
4. *The tenant is not required to reimburse the owner for undercharges caused solely by the owner's failure to follow HUD's procedures for computing rent or assistance payments.*
5. *A tenant must reimburse the owner for the total overpayment back to the date of admission if the following occurs:*
 - a. *The applicant submits information on income and family composition as the basis for the owner to make a determination that the applicant is eligible;*
 - b. *The applicant is admitted as a tenant; and*

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