Showing EIV Compliance

The Current Guidance
HUD Handbook 4350.3 Chapter 9

- **Addresses the Following**
  - **Which Reports to run and when to run them**
  - **Use of the Reports**
  - **Documentation and storage of the reports**
  - **Required Policies and Procedures**
  - **Use of EIV as Third Party Verification**
  - **Security**

The Reports and When To Use (HUD 4350.3 Exhibit 9-1)

- EIV Income Reports (Section 9-11)
  - Summary Report
    - At time of recertification (Interim and Annual) unless all eligible household members show a status of Verified when last run
    - Retain in Resident File
  - Income Report
    - Within 90 days after transmission of the move-in certification to TRACS
    - At time of recertification (annual and interim) of family composition and income and at other times as indicated in their policies and procedures.
    - Retain in Resident File
  - Income Discrepancy Report
    - At time of recertification (annual and interim) of family composition and income and at other times as indicated in their policies and procedures.
    - Must run at the same time the Income Report is run.
    - Retain in Resident File

- Other Income Reports (Paragraph 9-11(D)
  - No Income Reported on 50059
    - Owners must use this report only as identified and described in their policies and procedures
    - Not required to retain
  - No Income Reported by HHS or SSA
    - Owners must use this report only as identified and described in their policies and procedures
    - Not required to retain
  - New Hires Report
    - At least Quarterly
    - Retain in EIV "Master" File

- EIV Verification Reports (Pargraph 9-12)
  - Existing Tenant Search
    - At time of Application Processing
    - Retain in Applicant File, move to Resident File if housed
  - Multiple Subsidy Report
    - At lease quarterly
    - Retain in EIV "Master" File
  - Identity Verification Report
    - Monthly
    - Retain in EIV "Master" File
  - Deceased Tenant Report
    - At least quarterly
    - Retain in EIV "Master" File

Existing Tenant Report

- Checks to see if Applicants are receiving HUD Assistance from another source
- Does not require a signed 9887
- Must be printed prior to a new move in for all household members
- Use must be addressed in Tenant Selection Plan
- Must be used as outlined in the Tenant Selection Plan

Existing Tenant Report
If you have a Match

- Confirm the existing tenancy with the Applicant
- Know your company policy for action if the tenancy was not disclosed
- Begin to make contact with the existing property to coordinate move out/move in
  - Do so in writing
  - Request Landlord Reference
- Confirm move out before allowing move in

Existing Tenant Report
Showing Compliance

- Access and Print the Report for each member of the Applicant Household
- If no match file reports in Applicant file
- If match document all steps taken to coordinate end of old beginning of new subsidy and avoid duplicate subsidy
  - On Report
  - Case Clarification
  - Company Created Form

Summary Report

- The first check done by EIV when a new household is submitted
- Compares Name, DOB & SSN of all Household members to SSA database
- No further matching will be done until the Household Member has a status of Verified
- Must access and print at Recertification (Interim and Annual) unless all eligible Household Members had status of Verified when last printed

Summary Report Troubleshooting

- If there is no Summary Report the household is not in TRACS
- Check Social Security Card and compare to number info on 50059
  - Number
  - Complete Name
- Check Birth Certificate
  - Date of Birth
  - Complete Name
- Call Resident in to discuss
- Refer Resident to SSA

Summary Report Showing Compliance

- Access and Print Report
- If all are verified file in Resident File
- If one or more household members fail verification document all steps taken to investigate and correct problem
  - On Report
  - Case Clarification
  - Company Created Form

Income Report

- Must access and print within 90 days of submission of the 50059 for Move In or Initial Certification and prior to completion of ANY and ALL Certifications and at other times as called for in your policies -Do not access at any other time
- Cannot be accessed unless there is a signed 9887 for ALL household members age 18 & over
- Shows last 5 New Hires that occurred within the past five years

- Shows last 10 Quarterly Wages reported within the past five years
- Shows last 5 quarterly unemployment benefits within the past five years
- Shows last 5 Social Security and SSI Transactions within the past five years
- Shows current MediCare Premium and Status
- Inconsistent with Dual Entitlement
- Cannot use SSA Disability Indicator to prove disability

Income Report
Reconciling the Report

- Make sure that all sources of income have been reported
- Compare the actual income to the income reported on the 50059 that was in affect at the time the income was received
- If there appears to be a discrepancy **MUST** confirm by source document provided by Resident or traditional Third Party Verification
- Document your efforts and findings

Income Report-New Hires

- Shows last five New Hires within the last five years
  - Hire Date
  - Employer Name and Address
  - Date Received by EIV
- Must only review and reconcile hires that were Received by EIV since report was last accessed
- If there is a New Hire that was not previously reported must request source documents from Resident or traditional third party verification

Income Report
Quarterly Wage Report

- Shows Wages reported from the State Wage agencies to EIV for the last three years from current EIV Quarter by Quarter and the Quarter they were received
  - Q1 =January-March
  - Q2=April-June;
  - Q3=July-September;
  - Q4=October-December
  - Current EIV Quarter is 6-9 months ago
- Shows employer (or agent) name and address
- Shows date the information was received by EIV

Quarterly Wage Reports
Tips for Reconciliation

- Determine the last time that EIV was reviewed for the Resident
- Determine if any new quarterly wage reports have been received by EIV since last reviewed.
  - At AR can also check all received for past year as a QC measure
- For new reports determine when the income was received and what certification was in effect at the time
- Determine based on file information if the income was received during the entire quarter, or for how many full months or weeks it was received

- If employed the entire quarter multiply the quarterly wage by 4 to get an annual wage
- If received for two months multiply by 6 to get an annual wage
- If received for one month multiply the quarterly wage by 12 to get an annual wage
- If not employed an even number of months divide the quarterly wage by the number of Weeks employed and multiply by 52 to get an annual wage

- If multiple jobs in a single quarter with a single certification add all quarterly wages together and multiply by 4 to reach annual
- If multiple full quarters under a single certification may add all quarters together and multiply appropriately to determine annual

- Deduct from the Annual wage on the 50059
- If the difference is <$2400 no further action is required
- If the difference is >$2400 a potential overpayment exists
- Document your actions

Quarterly Wage Reports
Other Things to Watch For

- Job Changes
- Large jumps in quarterly wage
- Fluctuations caused by 3rd paychecks for bi-weekly paid employees
- If the discrepancy is still present in the last quarter reported to EIV the problem may be on-going

Income Report
Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in Resident file

Income Discrepancy Report

- Must access and print prior to completion of ANY and ALL Certifications and at other times called for in your policies-Do not access at any other time
- Cannot be accessed unless there is a signed 9887 for ALL household members age 18 & over
- **MUST** access and print the corresponding Income Report at the same time

Income Discrepancy Report

- Compares certain income information from **current** 50059 to EIV information from a one year time period that 14-24 months ago
- Looks at 50059 Income Types that are reported to EIV plus Business and ignores all others
- Is only intended to alert you of a potential problem, not as proof that a Household is committing fraud

What to do if a Resident shows on the Discrepancy Report

- Put their furniture on the street and change the locks-just kidding
- Look at what changed between the Period of Discrepancy analysis and the certification it is being compared to
- **IGNORE THE INCOME AMOUNTS-DO NOT TRY TO MAKE THEM MATCH**
- Document your efforts and findings

Income Discrepancy Report Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in case file according to company policy

New Hires Report

- Must access, print and reconcile at lease quarterly for the entire property for all Recertification months
- Cannot be printed unless there is a signed 9887 for ALL household members age 18 & over
- Shows New Hires received by EIV during the six months prior to the report date

Reconciling the Reports

- Compare the Report to the Resident files to determine if the job has been reported
  - For New Admissions follow company policy
- If it has not been reported send Traditional Third Party verification or call in the Resident and request Source docs
- Determine if late or non reporting of a change resulting in an overpayment has occurred

New Hires Report
Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in "Master" EIV file
- File copy in Resident file if unreported New Hire is discovered

Multiple Subsidy Reports

- Must access, print and reconcile at least quarterly
- Shows if any Household Member is receiving subsidy from any source in addition to your property
- Remember-at certain times multiple subsidy is allowable

If a Resident is listed on the Multiple Subsidy Report

- Contact the Resident
- Contact the other property
- Determine if the Resident is/was entitled to subsidy at your property
- Determine if fraudulent activity took place

Multiple Subsidy Report Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in "Master" EIV file
- Copies should be filed in the Resident file if there is multiple subsidy reported

Identity Verification Reports

- Must access, print and reconcile **Monthly**
- Shows Households in Process, Failed EIV Pre Screening and Failed SSA Matching
  - Household members coded as Ineligible non citizens will always show as failed EIV prescreening

What if my Resident is on this Report?

- Compare the Social Security Card to the 50059 data
- Check other personal information on the 50059 for accuracy
- Contact the Resident to make sure info is still accurate
- Refer the Resident to SSA to have the data corrected and provide proof

Identity Verification Report
Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in "Master" EIV file
- File copy in Resident file if identity mismatch is discovered

Deceased Tenant Report

- Must print and reconcile at least quarterly for the entire property for all Recertification months
- Shows any Residents who have been reported to SSA as deceased
- HUD prohibits the payment of subsidy to dead people

What if my Resident is on this Report

- Does the Resident still live at your property?
- Knock on their door-if they answer they are probably not deceased
  - Refer to SSA to correct the info
- If unable to reach the Resident attempt to contact the Emergency or Alternative Contact
- If there is no Emergency or Alternative Contact you may need to proceed as if the unit is abandoned
- Document your efforts and findings

Deceased Tenant Report Showing Compliance

- Access and print as outlined
- Document steps taken to review, reconcile and resolve discrepancies
  - On Report
  - On Case Clarification
  - On Company Form
- File in "Master" EIV file
- File copy in Resident file if deceased tenant is reported

Q & A