

Enterprise Income Verification (EIV)

Easier Than You think!

Welcome Everyone!



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Topics that will be discussed today

- ▶ EIV Reports & Use
- ▶ Master Log vs. Tenant File
- ▶ Identifying discrepancies & resolving



EIV Reference

- ▶ EIV Multifamily Help Desk: 1-800-767-7588 or mfeiv@hud.gov
- ▶ Chapter 9 in the HUD Handbook 4350.3 REV-1 Change 4 released in December 2013.
- ▶ EIV analysis is limited to Social Security income including SSI but not SSP income, employment and unemployment income.

Where EIV information comes from:

- ▶ Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS), for all tenants with valid personal identifying information (name, date of birth (DOB), and Social Security Number (SSN) reported on the form HUD 50059.

Rules of Behavior (ROB)

- ▶ If you are an EIV User or Coordinator, your ROB is included in the initial and current online (unsigned) access authorization forms.
- ▶ If you do not have access to the EIV system but you view or use EIV data or reports you must sign the ROB form (one page) that can be found on website <http://portal.hud.gov/hudportal/HUD?src=/programoffices/housing/mfh/rhiip/eiv/eivapps>
- ▶ The ROB must be signed and kept in the file. Upon request this documentation must be made available to the compliance monitoring entity.

Security Training

- ▶ EIV Coordinators/Users/Persons who view EIV reports without access, are required to complete online security training annually. EIV users must complete the online Cyber-Awareness Challenge and at the end of the training you must print and maintain the Certificate of Completion. (one hour long) The training can be found at https://iatraining.disa.mil/eta/disa_cac2018/launchpage.htm and select Department of defense employee.
- ▶ This training must be taken annually.

Certifications

- ▶ EIV Coordinators need to have owner approval to be coordinator.
- ▶ EIV Coordinators have to be certified initially (approx 8 pages) and annually (online - 1page)
- ▶ EIV Users have to be certified initially (approx 8 pages) and bi-annually (online - 1 page)
- ▶ All of this documentation must be kept on site for review by the compliance monitoring entity.

Penalties associated with EIV failures

- ▶ Owners who do not have access to or are not using the EIV system in its entirety will receive a finding on the Management and Occupancy Review (MOR) report and will incur a penalty of a 5% decrease in the voucher payment for the month following the date of the violation was found and each month after until the violation is cured.
- ▶ When there is a change in ownership or management of a property, the new owner or agent must obtain access to and begin using the EIV system within 90 days from the date the owner takes possession of the property. Failure to do so may result in the 5% penalty.

REPORTS TO BE MAINTAINED IN THE MASTER LOG

- ▶ No Income Report
 - ▶ Identifies tenants that have no income reported by HHS or SSA but does NOT mean the tenant does not have any income.
- ▶ Multiple Subsidy Report
 - ▶ Identifies tenants who may be receiving rental assistance at more than one location.
 - ▶ Run at least quarterly.



- ▶ **Failed EIV Pre-Screening Report**

- ▶ Identifies tenants who have missing or invalid personal identifiers such as last name, date of birth, or SSN in TRACS.
- ▶ Run monthly.

- ▶ **Failed Verification Report**

- ▶ Identifies tenants whose personal identifiers (last name, DOB, SSN) do not match the SSA database.
- ▶ Run monthly.



- ▶ **Deceased Tenants Report**

- ▶ Identifies tenants reported by SSA as being deceased.
- ▶ Run at least quarterly.

- ▶ **New Hire Summary Report**

- ▶ Identifies tenants who have new employment within the last 6 months.
- ▶ Run at least quarterly.
- ▶ The New Hire Summary report goes in the master log. (See New Hire Detail Report further in presentation)

REPORTS TO BE MAINTAINED IN THE TENANT FILE

▶ Summary Report

- ▶ Summary of household information from the current, active certification in TRACS.
- ▶ All household members must be “verified”.
- ▶ When all household members required to have a SSN, have a “verified” status, O/A does not have to continue to print out the Summary Report at recertification unless there is a change in household composition or in a household member’s identity verification status. (Depending on your CA and state, you may be required to do this report annually. Check with your CA.)

▶ Income Report

- ▶ Provides employment and income reported by HHS and SSA for each household member.

▶ Income Report Continued

- ▶ The employment income is only used to advise that the tenant has employment income. O/A must verify the amount of income with 4-6 paystubs or third party verification.
- ▶ This report is used for the SS and SSI income in dollar amount and Medicare amount.
- ▶ This report will also show if the tenant is or has received unemployment income. The dollar amount must be third party verified as the dollar amount on the income report is not to be used as the amount on the 50059.

▶ 90 Day Income Report

- ▶ This must be run on new admissions within 90 days after the move-in information is transmitted to TRACS to confirm/validate the income reported by the household at move-in.

▶ Income Discrepancy Report

- ▶ Identifies households where there is a difference of \$2,400 or more in the wage, unemployment, and SSA benefit information reported in EIV and wage, unemployment and SSA benefit information reported in TRACS for the period of income used for discrepancy analysis.
- ▶ This report serves as a tool to alert the O/A that there may be a discrepancy in the income reported by the tenant during the period of income used for the discrepancy analysis.
- ▶ This report is to be run at Annual and Interim Recertification.



▶ **New Hire Detail Report**

- ▶ Each individual tenant's report is to be printed separately and place in their file.
- ▶ The detail report along with any correspondence with tenant, third party verifications, and HUD 50059 should be kept together in the tenant file.
- ▶ This report is printed when tenants show up on the New Hire Summary Report, which is printed at least quarterly.

Existing Tenant Search

- ▶ This report identifies applicants who may be receiving assistance at another Multifamily or PIH location. This is the first EIV report to be run for an applicant.
- ▶ This report is to be run at the time of processing the application.
- ▶ Run this report on **ALL** household members including children.
- ▶ A copy of this report is to retained in the TENANT FILE.
- ▶ If there is an Alert you must follow up with the applicant's current landlord to confirm the individual's program participation status before admission and coordinate move-in/out dates.

Medicare Premiums

- ▶ On the Income Report
 - ▶ If the Medicare premium is being paid by the tenant, the amount of the premium is listed under “premium” and an “N” is in the “Buy-in” column on the Section regarding Medicare.
 - ▶ When Medicare is being paid by the state or another entity, there should be a “Y” in the “Buy-in” column. Under the “Buy-in Start” column will be the date the third party started paying it.
 - ▶ When the third party no longer pays the Medicare there will be a date it was no longer paid in the “Buy-in Stop” column. However, the “Y” and dates are not always accurate as this information is provided by the SSA. If the tenant disputes, have them provide current documentation or verification.

Income Discrepancy Report

- ▶ There will only be an Income Discrepancy Report when there is a difference of \$2,400 (\$200 or more a month) or more annually in income.
- ▶ The report shows both under and over reporting of income. If there is a negative number on the report it may mean the tenant under reported income. A positive number represents that there may be a decrease in the tenant's income. In either case, the owner must investigate all discrepancies identified to determine if they are valid or not.
- ▶ The owner/agent is not expected to reconcile dollar amounts to the penny when resolving discrepancies.

► Owners Must:

- Print the Income Discrepancy Report at the same time you print the Income Report (annual and interim recertification.)
 - Keep in mind the report is over-written with current data weekly.
- Discrepancies should be reviewed and discussed with the household at the time of recertification or within 30 days of the EIV Income Report date.
- Keep the Income Discrepancy Report and all supporting documentation on the resolution in the tenant file.

- ▶ Make sure the information in TRACS agrees with the information on the HUD 50059 in the tenant file. If the information in TRACS is different, retransmit the current 50059 to correct the TRACS database.
- ▶ When unreported or underreported income is discovered, the owner must go back to the time of non or under reported income, but not to exceed the 5 year limitation that the tenant received assistance.

Reasons there may be a discrepancy

- ▶ EIV only has access to employment, unemployment, and SS/SSI income.
- ▶ Therefore, if someone is receiving a pension, welfare, child support, alimony, or VA benefits this will cause an income discrepancy to show up.
- ▶ SSP income comes from the Department of Welfare. HUD does not have an agreement with the Department of Welfare; therefore, it did not include this income in the total. That gives you an income discrepancy.
- ▶

- ▶ If someone is receiving SS type income but based on someone else's (ex:spouse) SSN, this too will give an income discrepancy on the report.
- ▶ Not all states participate in the Data Share Agreement with HUD and Social Security. Federal SSI income that will be in the EIV system is only reflected in 33 states. This may cause a discrepancy if they are receiving from a state not included in the 33.
 - ▶ Sue Smith receives \$275/mo from Federal SSI
She also receives \$300/mo from the state. Sue lives in one of the states not included in the 33 states. This will cause a discrepancy due to the state amount of \$300 mo which is over the \$200 mo/\$2,400 annually.

Knowing the Income Discrepancy Report

▶ Head of Household (HOH) Information Section

- ▶ Effective Date of Action: This is the effective date of the most current 50059 in TRACS.
- ▶ Projected Annual Wages and Benefits from HUD 50059: (this would be employment, unemployment, and SS income).
- ▶ Period of Income for Discrepancy Analysis: this is the timeframe of the discrepancy.

▶ **Discrepancy Analysis Section**

▶ The columns to the right on this section:

- ▶ Actuals are what was reported in HHS
- ▶ Annualized Last Quarter is what is listed on the 50059

How to dissect an Income Discrepancy

- ▶ First - check the Period of Income (POI) for Discrepancy Analysis
 - ▶ Period of Income Start Date: This date represents the starting point for the income period. The period of income start date is 15 months prior to the effective date on the HUD 50059.
 - ▶ Period of Income End Date: This date represents the end of the period of income and is 3 months prior to the effective date on the HUD 50059.
 - ▶ Easiest example:
 - ▶ Move in date: 9/1/16
 - ▶ POI: 9/1/15 - 8/31/16
 - ▶ The answer would be: The discrepancy happened prior to move-in. This is what you would write on the report.

▶ Example:

▶ 50059 income includes

▶ \$695/month SS = \$8,340

▶ \$1050 /month Employment = \$12,600

▶ \$200 /month VA Disability = \$2,400

▶ Total income on 50059 = \$23,340

▶ Keep in mind, EIV only knows \$20,940 to be this tenant's income

▶ EIV does not know the \$2,400 VA benefit income. HUD does not have an agreement with the VA; therefore, it did not include this income in the total. That gives you an income discrepancy.

▶ Write on the report: Tenant has VA income that is not counted in EIV.

Examples cont.

- ▶ If you have a tenant that gets a job, quits a job, gets a job, quits a job you will always get an income discrepancy on this tenant. Remember we always project for the next year on a 50059. Write on the report: This tenant had a job then quit then got another job and quit. All jobs were verified and corrected 50059s are in the tenant file.
- ▶ You have a tenant that is coming up with an income discrepancy that has employment history. Look at the income report for the listing of the employers. Check with the tenant file to ensure that you have a verification for all employers listed. If there are 4 employers listed on the income report and there are only 3 employer verifications in the file. There is an employment that is missing which will cause an income discrepancy. Management will need to verify and complete an Interim if warranted.

- ▶ Using the POI discrepancy analysis of 2/1/16 through 1/31/17
 - ▶ The tenant moved in September 2015.
 - ▶ The move-in 50059 runs from September 5, 2015 to August 31, 2016.
 - ▶ September 2016 AR. Runs 9/1/16 to 8/31/17
 - ▶ Then IR effective 11/1/16. (quit job) runs 11/1/16 to 10/30/17.

- ▶ You know there is a discrepancy so now you have to investigate.
- ▶ You will use the income report to figure out the EIV income.
- ▶ Because the POI starts 2/1/16 - you have to take the first quarter income listed on the income report.
- ▶ We will use the amount of \$2,384.00. You have to take \$2,384 divide by 3 = \$794.66/mo.
- ▶ The second quarter income listed on EIV is \$3,458 divide by 3 = \$1152.66/mo.
- ▶ The third quarter income listed is \$1,987 divide by 3 = \$662.33/mo.
- ▶ Fourth quarter income listed is \$798 divide by 3 = \$266/mo.

▶ EIV chart would look like this:

▶ 2016

▶ Feb - \$ 794.66

▶ Mar - \$ 794.66

▶ Apr - \$1152.66

▶ May - \$1152.66

▶ June - \$1152.66

▶ July - \$662.33

▶ Aug - \$662.33

▶ Sept - \$662.33

▶ Oct - \$266.00

▶ Nov - \$266.00

▶ Dec - \$266.00

▶ _____

▶ Total EIV \$7,832

Move-in 50059 looks like this

2016

Feb - \$652.66

Mar - \$652.66

Apr - \$652.66

May - \$652.66

June - \$652.66

Jul - \$652.66

Aug - \$652.66

Sep - \$652.66

Oct - \$652.66

Nov - \$652.66

Dec - \$652.66

MI income on 50059 \$7,832

- ▶ You continue to break it out in that manner through all the certifications in the file for the POI timeframe for the 50059s and quarterly income listed on the income report.
- ▶ If you find a true discrepancy, then management would complete an IR 50059 and charge the tenant the back rent due to non reporting.



▶ **QUESTIONS??**



