Office of Public & Indian Housing

Rental Housing Integrity Improvement Project (RHIIP) Training

UPFRONT INCOME VERIFICATION (UIV):

Streamlining the Income Verification Process within Public Housing & Section 8 Rental Assistance Programs

Using HUD's Enterprise Income Verification (EIV) System to Detect & Prevent Fraud

July 17, 2007

Agenda

- Welcome
- EIV System Overview
- What's New in EIV 7.0
  - What's Coming in EIV 8.0 & 9.0
- Using EIV to Streamline the Income Verification Process
  - HUD's Proposed Rule to Mandate Use of EIV
- EIV System Basics
  - Getting Access
  - Accessing Income Data
- Using EIV to Detect & Prevent Fraud
  - Income Discrepancy Report
  - New Hires Report
  - Multi-subsidy Report
  - Failed Verification Report
- Questions & Answers Session

Training Objectives

- At the end of this training you will know how to:
  - Use the EIV System to streamline the income verification process
  - Effectively use EIV reports before, during and after mandatory reexaminations of income
  - Use the EIV System to detect and deter fraud within the Public Housing and Section 8 programs
  - Identify participants who have started a new job
  - Identify participants who may already be receiving rental assistance
  - Correct erroneous participant personal identifiers
  - Identify deceased participants and take appropriate action
  - Resolve potential income discrepancies

EIV System Overview

- Upfront income verification (UIV) tool provided by HUD to PHAs that administer the Public Housing and/or Section 8 program
- HUD does not charge a fee to use
- Web-based application which provides income information of current tenants
  - Employment information (employer name, address, FEIN)
  - Quarterly wages (including Federal wages)
  - New Hire information (W-4)
  - Quarterly unemployment benefits
  - Monthly Social Security benefits
- EIV data sources
  - National Directory of New Hires
  - Social Security Administration

What's New in EIV 7.0

- Income Information
  - New column added to list the relationship of each household member in the member list table under the summary report tab
  - Ability to generate reports by project number (for public housing)
- Income Discrepancy Report
  - Download capability added
  - Ability to generate report by project number (for public housing)
- Verification Reports
  - Ability to generate report by project number (for public housing)
  - Existing Tenant Search is a new feature that gives the user the ability to search by a SSN and identify possible receipt of multiple subsidies

What's Coming in EIV 8.0 (Release Date – November 2007)

- Deceased Tenants Report
  - Identify household members that are deceased
  - Provide statistical information on deceased tenants
- User Termination Report
  - Identify terminated users
  - Record of reason user was terminated

What's Coming in EIV 9.0 (Release Date - 2008+)

- PHA/Tenant certification
- EIV for applicants
- Other suggestions? Please contact PIH staff:

  - Nicole Faison (202) 708-0744 or
    - email: Nicole.Faison@hud.gov
  - Linda Scott (202) 402-4028 or
    - Email: Linda.Scott@hud.gov

Streamlining the Income Verification Process

Using HUD's EIV System

What is Upfront Income Verification (UIV)?

Upfront Income Verification:

the verification of income, before or during a family reexamination, through an independent source that systemically and uniformly maintains income information in computerized form for a large number of individuals.

"Automated Written 3rd Party Verification"

Simplifying The Income Verification Process

- The ***old*** way of doing business:
  - Tenant reports income & provides documents
  - PHA requests written 3rd party verification of tenant-reported income from source
  - PHA uses written 3rd party verification to calculate anticipated annual income

Simplifying The Income Verification Process - Continued

- The ***new*** way of doing business:
  - Tenant reports income
  - Tenant provides PHA with **current** documentation
  - PHA consults EIV system & prints income details report (include in tenant file folder – except PHAs in Florida)
  - If additional information is not needed, PHA uses current tenant provided documents to calculate anticipated annual income (If additional information is needed, PHA will request written 3rd party verification)

Simplifying The Income Verification Process - Continued

- Written 3rd party verification is required only if:
  - The tenant disputes the UIV data
  - Additional information is required, such as
    - Effective dates of employment
    - Pay rate, number of hours worked, pay frequency for new jobs
    - Confirmation of change in circumstances (reduced hours, reduced rate of pay, etc.)
- The PHA will use current tenant provided documents or most current information to calculate anticipated annual income

Simplifying The Income Verification Process (Continued)

File Documentation -

- **<u>Acceptable Verifications:</u>**
  - UIV**+**Current tenant provided documents; or
  - UIV**+**Current tenant provided documents+Written 3rd party verification *[Required when tenant disputes UIV data or PHA requires additional information]*

<u>Note:</u> Tenant-provided documents should be dated within the last **60** days of the reexamination interview date. Pay stubs should be current and consecutive!

Tenant Obligation To Supply PHA/HUD With Information

- **24 CFR 960.259 & 982.551**
  - The family ***must*** supply any information that the PHA or HUD determines is necessary in the administration of the program…
  - The family ***must*** supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements

HUD's Proposed Rule

Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs [72 FR 33844 - June 19, 2007]

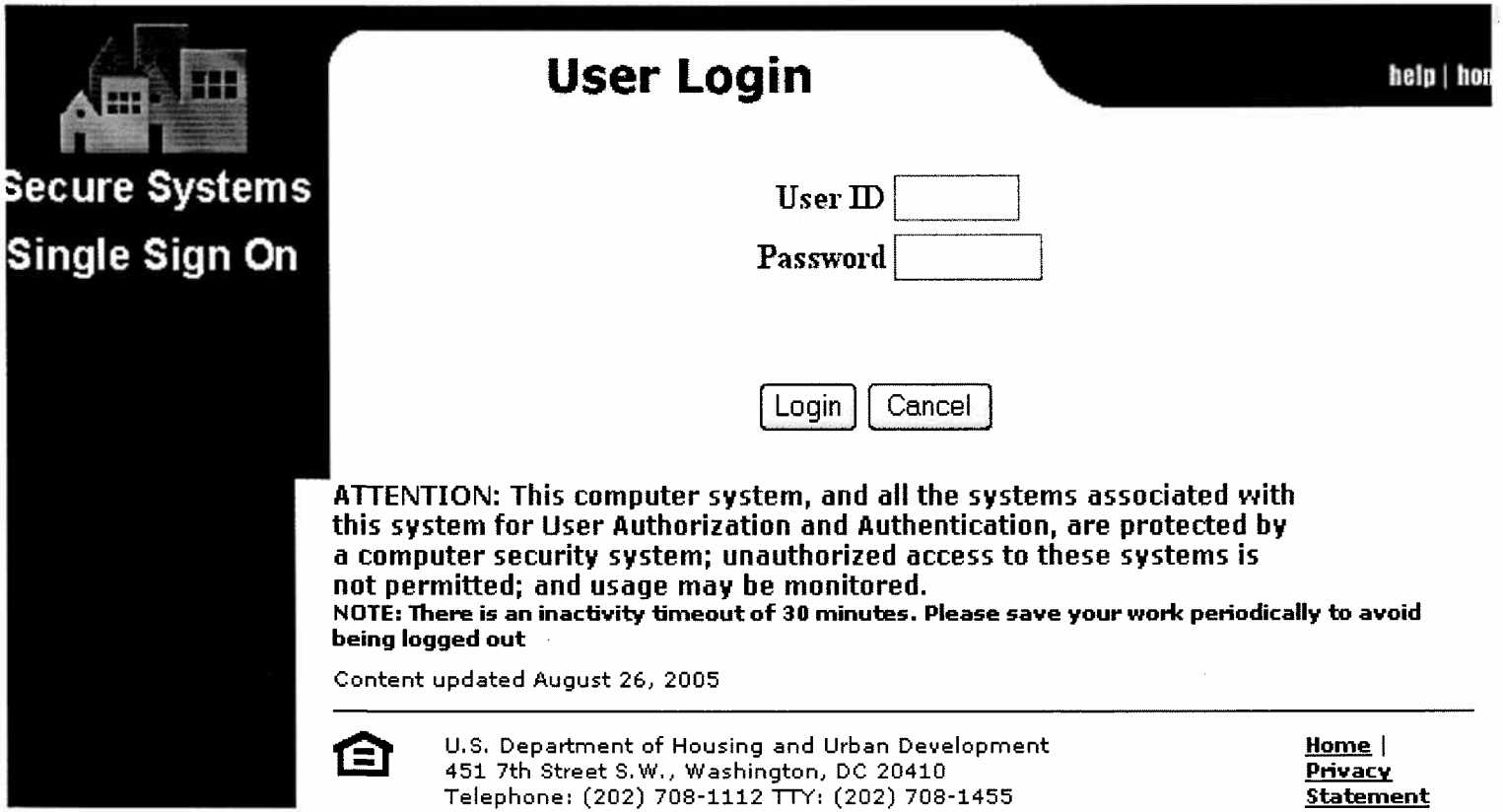
- Comments to HUD on this rule due 08/20/07
- Mandate the use of UIV techniques
- Require SSN for all household members (elimination of age 6 threshold)
- Change definition of annual income at 24 CFR 5.609
  - Use of actual (past) annual income in determining family's eligibility;
  - However, if more current verified income data exists, it must be used and annualized to determine annual income

Getting Access to PIH-EIV

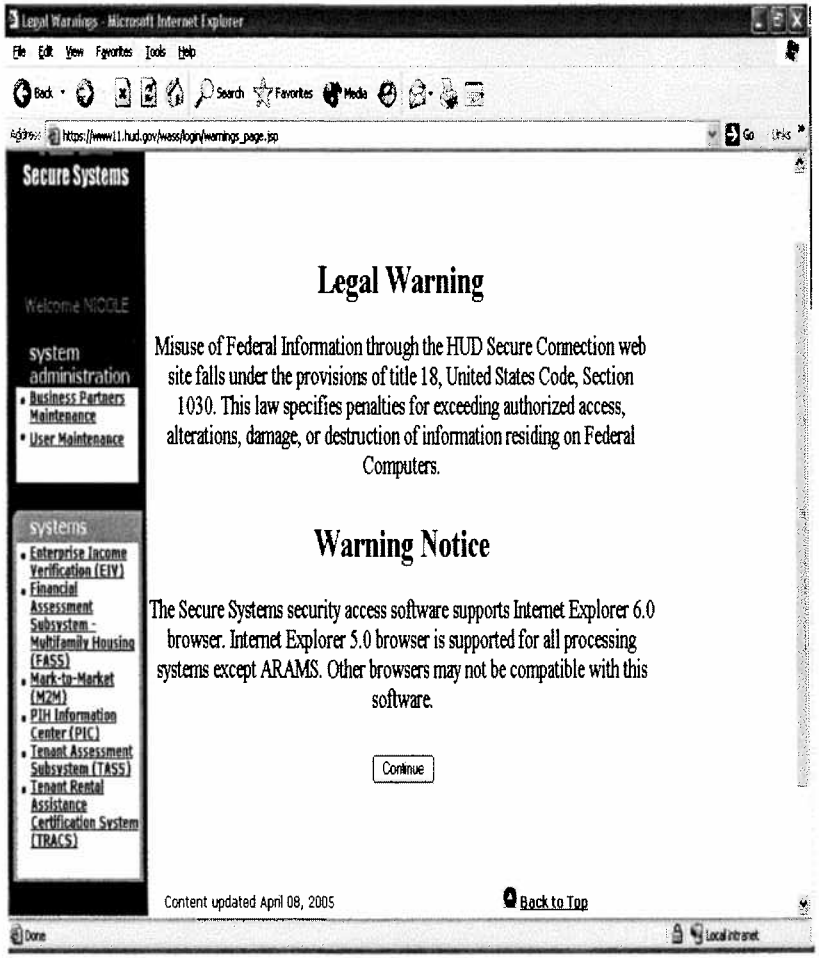
- Complete User Access Authorization Form
- Obtain supervisor's approval
- Submit access request to local HUD office
- HUD field office will grant access and send e-mail confirmation
- HUD-PIH staff can not grant access to EIV for MFH users.
  - For MFH EIV Access - Call (202) 708-3000; or
  - See MFH website for more information http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm

** All EIV users must have a WASS ID with active PIC & EIV access rights

Logging On To EIV

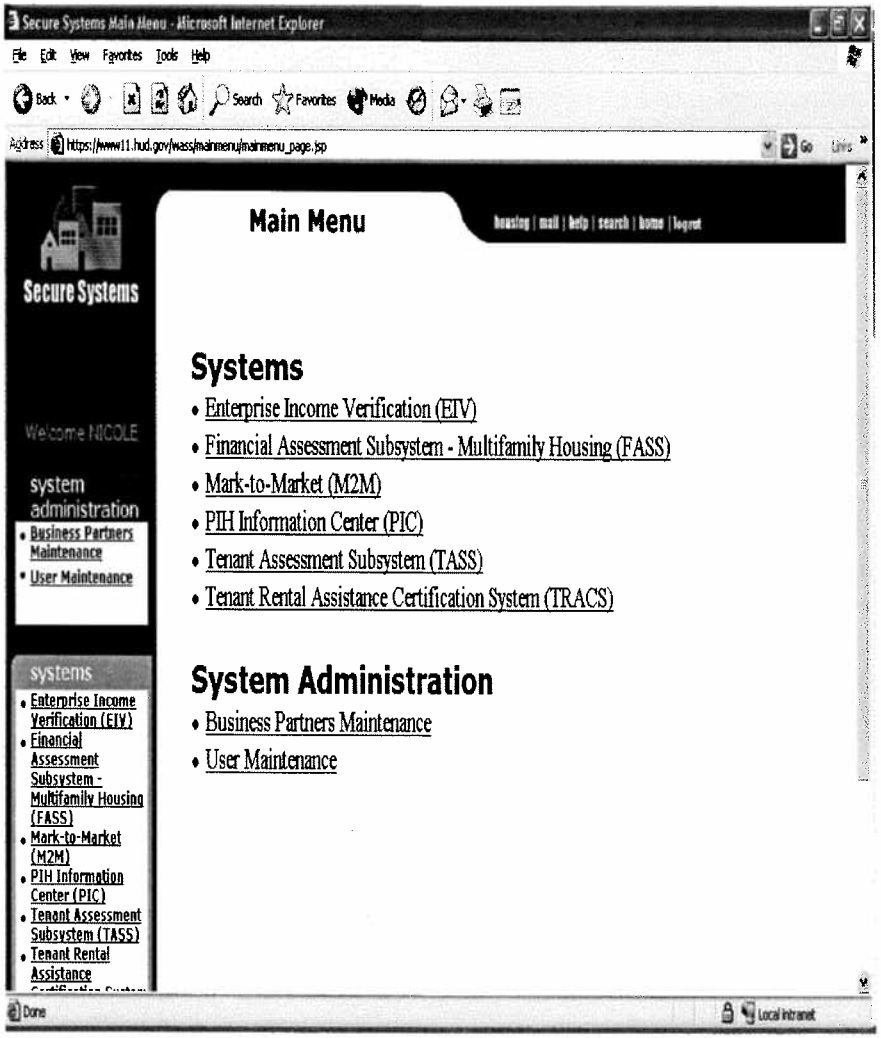


Logging On To EIV (Continued)



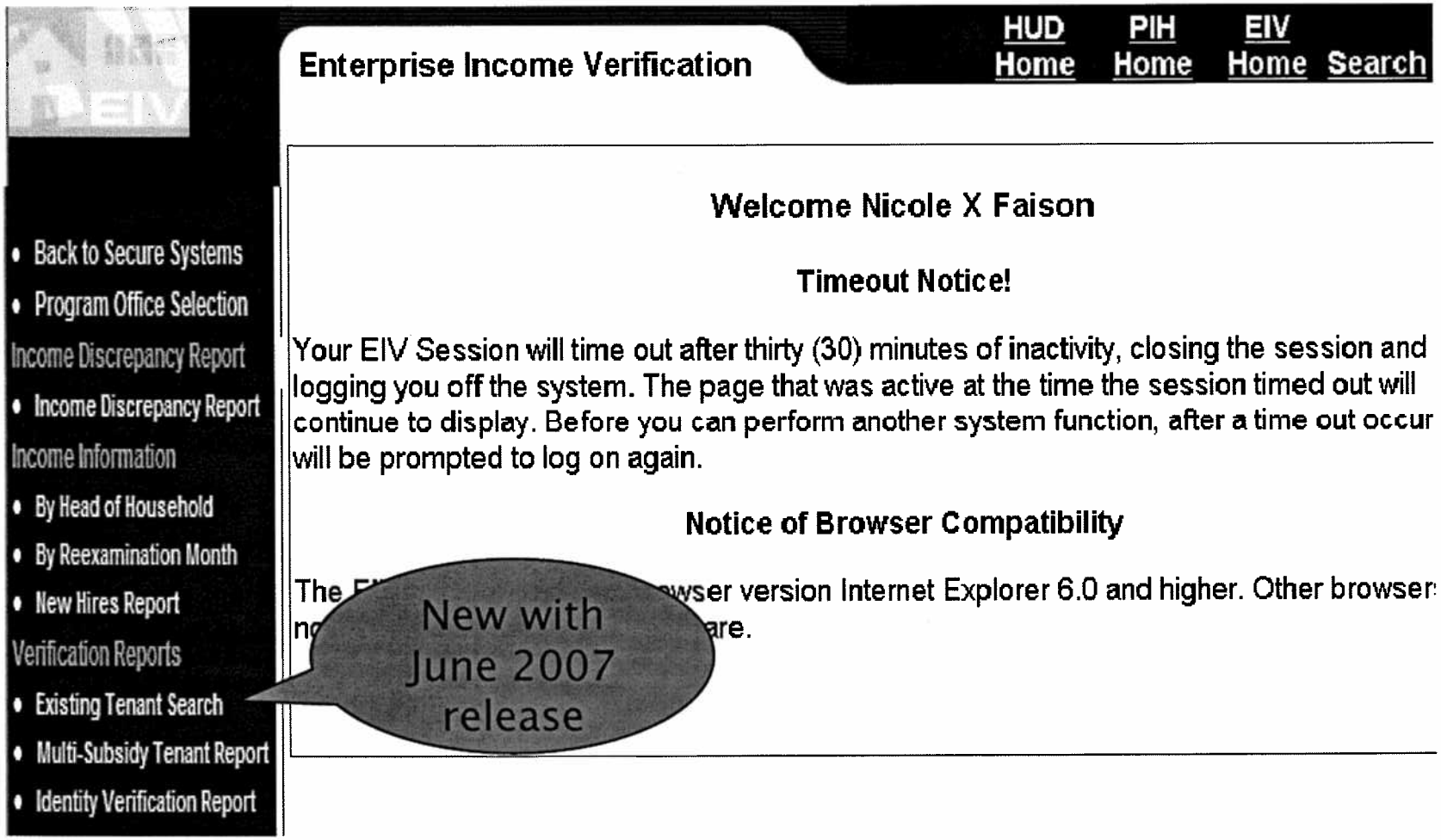
- Click continue at the Legal Warning & Warning Notice screen
- There are penalties for misuse and/or unauthorized use of data contained in Federal systems

Logging On To EIV (Continued)



- Click on the Enterprise Income Verification (EIV) link to access the system
- Note: If user does not see EIV link make sure WASS ID has PIC and EIV access rights assigned to it **and** user ID has not expired!

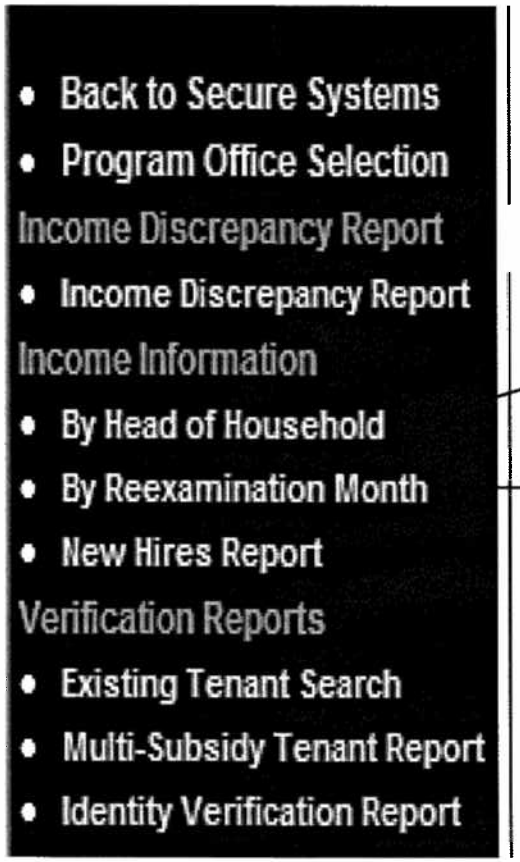
Getting Started in EIV



Viewing UIV Data For a Household

- Ability to view household summary, income details or income discrepancy information within one click
- Click on the Income Report tab to view household income details
  - Available employment and income information is displayed for each household member
  - Detailed error messages as to why a household member's identity verification failed
  - Date household member died is displayed for any household member whose identity verification status is "deceased"

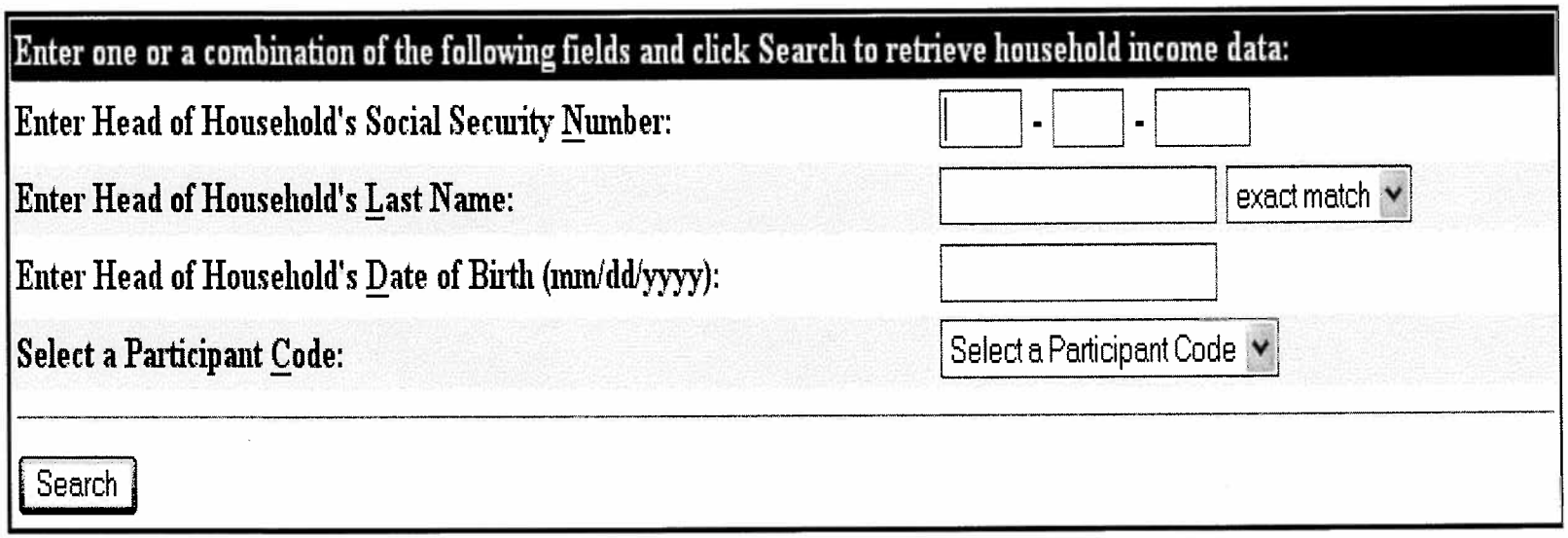
Obtaining Household Income Information



- Users can search for income records by multiple criteria:
  - HOH SSN; and/or
  - HOH last name; and/or
  - HOH date of birth; or
  - Reexamination month and program type
    - All, PH, S8
- Click on either link to begin search

Searching For Income Information By Head of Household SSN

Income Information >> By Head of Household



Viewing UIV Data For a Household - Summary Report

Summary Report | Income Report | Income Discrepancy Report

Head of Household Identifiers

Name:	[redacted]
Social Security Number:	***-**-6[redacted]
Date of Birth (mm/dd/yyyy):	XX/XX/1972
Program Type:	Public Housing
Project:	UPTOWN APARTMENTS
Unit Address:	[redacted] altimore MD 21217
Participant Code:	MD002
Annual Reexamination Date:	01/01/2007
Tenant Data from Form 50058 as of:	08/17/2006
Most Recent Type of Action:	2-Annual Reexamination
Effective Date:	07/01/2006

Family Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Identity Verification Status
***-**-6[redacted]5	[redacted]	[redacted]	XX/XX/1972	34	Verified
***-**-2[redacted]1			XX/XX/1994	12	Verified
***-**-3[redacted]0			XX/XX/1999	7	Verified

The month and day values in the Date of Birth field have been masked for security reasons.

Provide ICN

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

Viewing UIV Data For a Household - Income Report

Printer-Friendly Version

Summary Report | Income Report | Income Discrepancy Report

Wage and Benefit Report for Household of TIRANIA SWANN

PHA Code:	MD002	**Program Type:**	Public Housing
PHA Name:	Baltimore City Housing Authority	**Project:**	UPTOWN APARTMENTS
Annual Reexamination Date:	01/01/2007	**Form 50058 as of:**	08/17/2006
Address:	Baltimore MD 21217		
Most Recent Type of Action:	2-Annual Reexamination	**Effective Date:**	07/01/2006

Head of Household:

Social Security Number: ***-**-6455 **Date of Birth:** XX/XX/1972

Family Member: **SSN:** ***-**-6455 **Date of Birth:** XX/XX/1972

Employment Information

EIV received no Employment (W4) data.

Wages

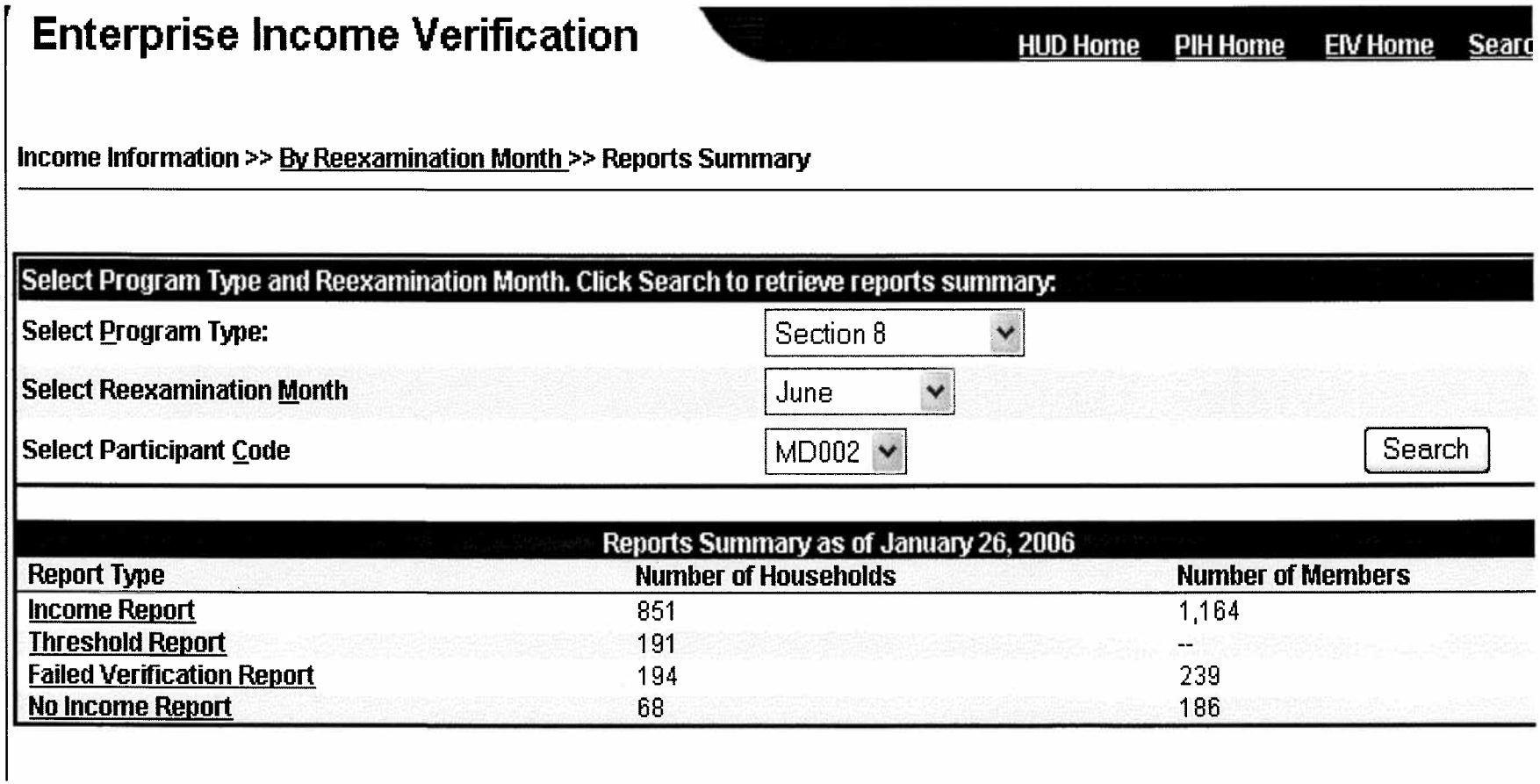
Pay Period	Amount	FEIN	Employer Name and Address	Date Received by EIV
Q3 of 2006	$25,934.00	52-0270070	VERIZON MARYLAND INC PO BOX 182523, COLUMBUS OH 43218-2523	03/14/2007

VERIZON MARYLAND INC

Viewing UIV Data
For a Household – Income Details

Family Member:		SSN: ***-**-6455	Date of Birth: XX/XX/1972	
Employment Information				
EIV received no Employment (W4) data.				
Wages				
Pay Period	**Amount**	**FEIN**	**Employer Name and Address**	**Date Received by EIV**
Q3 of 2006	$25,934.00	52-0270070	VERIZON MARYLAND INC PO BOX 182523, COLUMBUS OH 43218-2523	03/14/2007
Q2 of 2006	$28,693.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	11/28/2006
Q1 of 2006	$23,641.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	09/21/2006
Q4 of 2005	$23,316.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	09/21/2006
Q3 of 2005	$26,350.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	09/21/2006
Q2 of 2005	$20,235.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	09/21/2006
Q4 of 2004	$18,140.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH 43218-2523	09/21/2006
Q3 of 2004	$14,839.00	52-0270070	VERIZON MARYLAND INC C/O JON-JAY ASSOCS, P O BOX 182523, COLUMBUS OH	09/21/2006

Searching For Income Information By Reexamination Month – Reports Summary



Enterprise Income Verification

HUD Home | PIH Home | EIV Home | Searc

Income Information >> By Reexamination Month >> Reports Summary

Select Program Type and Reexamination Month. Click Search to retrieve reports summary:

Select Program Type: Section 8

Select Reexamination Month: June

Select Participant Code: MD002

Search

Reports Summary as of January 26, 2006

Report Type	Number of Households	Number of Members
Income Report	851	1,164
Threshold Report	191	--
Failed Verification Report	194	239
No Income Report	68	186

Searching For Income Records By Reexamination Month – Failed Verification Report

Income Information >> By Reexamination Month >> Reports Summary >> Failed Verification Report

Failed Verification Report

Participant Code:	MD002 Baltimore City Housing Authority
Program Type:	All PIH Programs
Reexamination Month:	July
Households that Failed Verification:	392

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1 2 3 4 5 6 7 8

51 - 100 of 392 Households

HH SSN		HH Name	BROWN	HH DOB 06/03/1979	Project MD002003 PERKINS HOMES
Member SSN	**Member Name**	**Member DOB**	**Failed Verification Description**		
		06/03/1979	Verification failed - SSN not found in SSA records		
		07/02/2000	Verification failed - SSN not found in SSA records		
HH SSN		**HH Name**	**WILLIAMS**	**HH DOB 12/29/1930**	**Project MD002044 WYMAN HOUSE**
Member SSN	**Member Name**	**Member DOB**	**Failed Verification Description**		
		12/29/1930	SSN is verified; individual is deceased 04/23/2002		
HH SSN		**HH Name**	**WILSON**	**HH DOB 05/11/1931**	**Project MD002059 VACANT HOUSE**
Member SSN	**Member Name**	**Member DOB**	**Failed Verification Description**		
		05/11/1931	SSN is verified; individual is deceased 10/17/2004		

Use of EIV to Detect & Deter Fraud

- New Hires Report
  - Identify tenants who may have started a new job
- Existing Tenant Search
  - Check applicants' to identify (possible) participation in a HUD rental assistance program
- Multi-subsidy Report
  - Identify tenants who may be receiving multiple rental assistance
- Failed Verification Report
  - Identify deceased program participants
  - Identity incorrect personal identifiers
- Income Discrepancy Report
  - Identify tenants who may not have disclosed all income

Accessing the New Hires Report

Use this report to identify families that **may** have started a new job

New Hires Report – Summary Reports

Income Information >> New Hires Report >> Report Selection >> PHA Statistics

New Hires Summary Report	
Participant Code:	DC001 D.C Housing Authority
Program Type:	All PIH Programs
Reexamination Month:	All
Period Reviewed:	01/08/2007 - 07/07/2007
Households With New Hires:	21
Members With New Hires:	21

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1 - 21 of 21 Households

Summary Reports | **Detail Reports**

HOH SSN	HOH First Name	HOH Last Name	HOH DOB	Member Name	Program Type	Project	Unit Code	Unit Address
			09/22/1973		Sec.8 Mod Rehab			WASHINGTON DC 20032
			02/08/1967		Tenant-Based Assistance			WASHINGTON DC 20019-

New Hires Report – Detail Reports

Summary Reports | Detail Reports | Printer Friendly Versic

New Hires Report for Household of CHRISTINE P ABRAHAMSON

PHA Code:	AK001	**Program Type:**	Public Housing
PHA Name:	AK001 AHFC	**Project:**	AK001013 ETOLIN HEIGHTS
Annual Reexamination Date:	06/01/2008	**Form 50058 as of:**	07/05/2007
Address:		AK 99929	
Most Recent Type of Action:	2-Annual Reexamination	**Effective Date:**	06/01/2007

Head of Household:

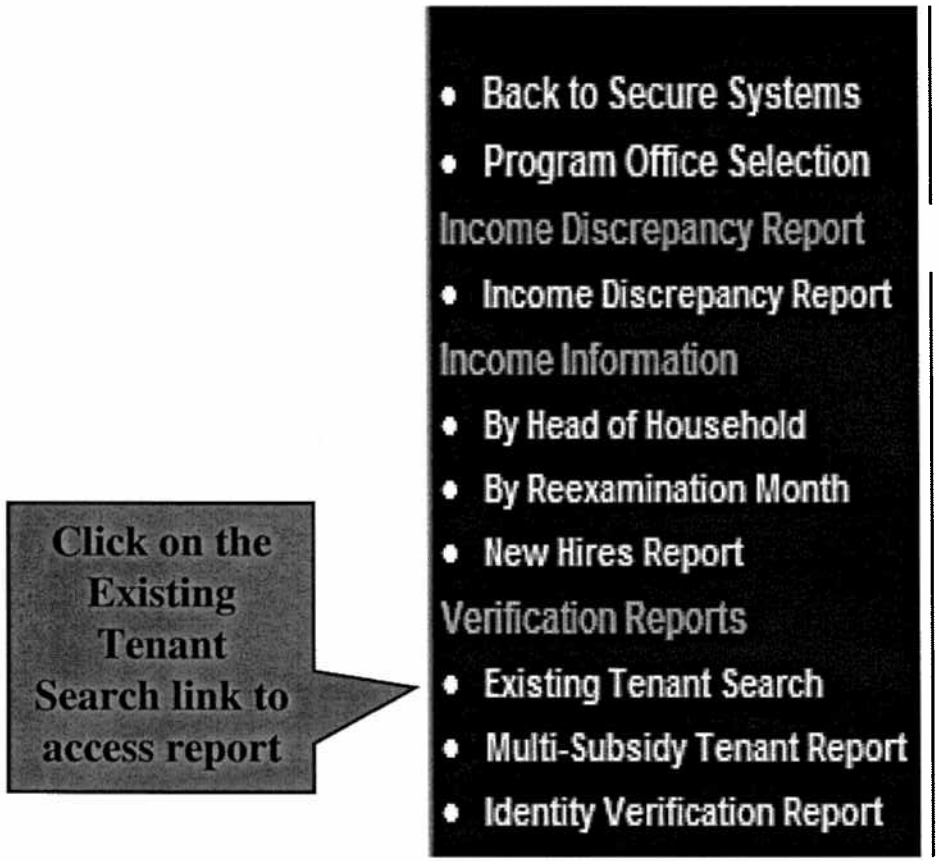
Social Security Number: ***-**-9978 **Date of Birth:** XX/XX/1975

Family Member: CHRISTINE P ABRAHAMSON **SSN:** ***-**-9978 **Date of Birth:** XX/XX/1975

Employment Information

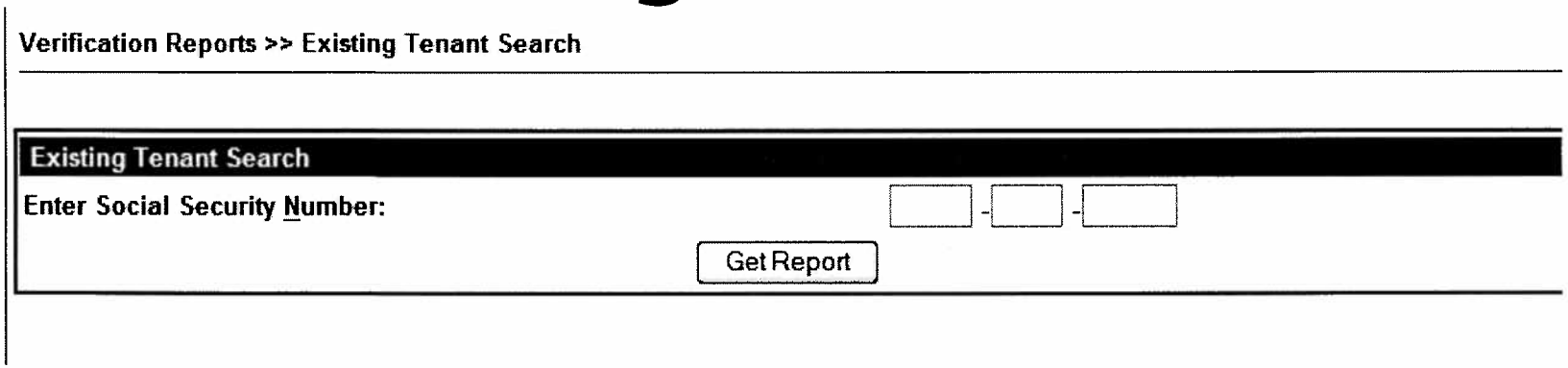
Hire Date	Hire State	FEIN	Employer Name and Address	Date Received by EIV
02/27/2006	AK	92-0129543	WRANGELL COMMUNITY SERVICES PO BOX 1231, WRANGELL AK 99929	03/16/2007
01/10/2006	AK	92-0129543	WRANGELL COMMUNITY SERVICES PO BOX 1231, WRANGELL AK 99929	03/16/2007
11/07/2005	AK	92-0036505	CENTRAL COUN TLINGIT & HAIDA 9097 GLACIER HWY, JUNEAU AK 99801	03/16/2007

Accessing the Existing Tenant Search Report

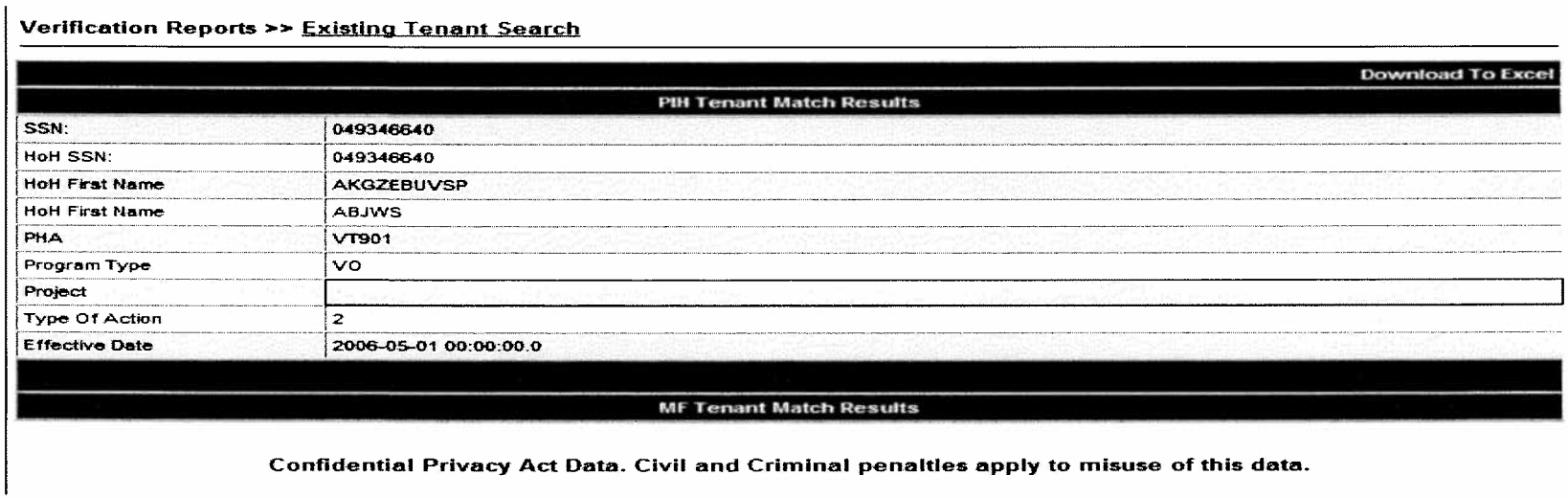


Find out if an applicant is already receiving rental assistance before admission

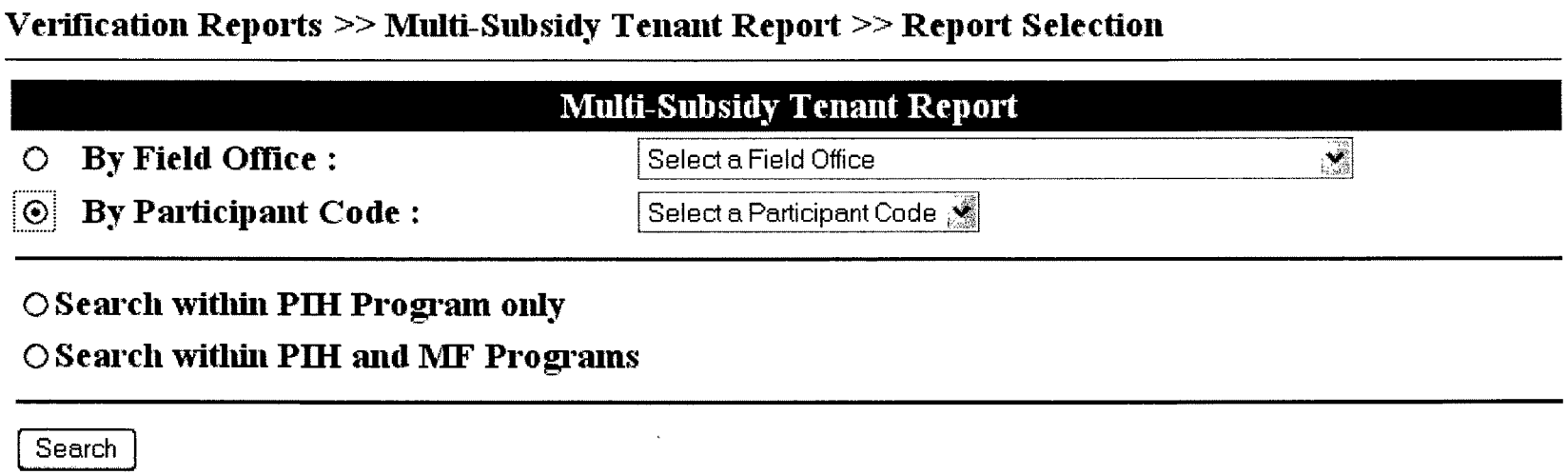
Existing Tenant Search



- Simply type in SSN and click get report
- Report displays information on current tenancy

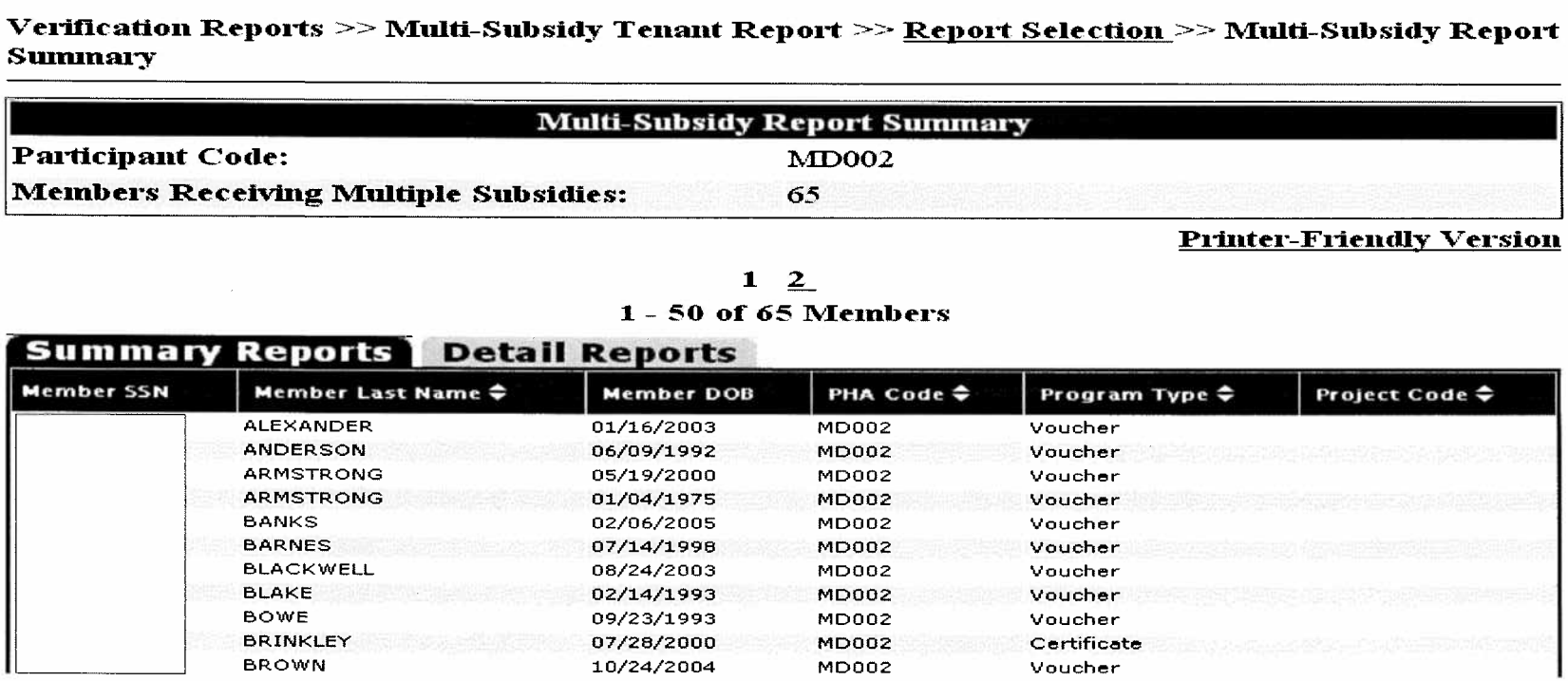


Multi-Subsidy Tenant Report



- Allows user to search within PIH and MFH programs to identify individuals that may be receiving multiple rental subsidy

Multi-Subsidy Tenant Report Summary Reports



Verification Reports >> Multi-Subsidy Tenant Report >> Report Selection >> Multi-Subsidy Report Summary

Multi-Subsidy Report Summary

Participant Code:	MD002
Members Receiving Multiple Subsidies:	65

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1 2

1 - 50 of 65 Members

Summary Reports | Detail Reports

Member SSN	Member Last Name	Member DOB	PHA Code	Program Type	Project Code
	ALEXANDER	01/16/2003	MD002	Voucher	
	ANDERSON	06/09/1992	MD002	Voucher	
	ARMSTRONG	05/19/2000	MD002	Voucher	
	ARMSTRONG	01/04/1975	MD002	Voucher	
	BANKS	02/06/2005	MD002	Voucher	
	BARNES	07/14/1998	MD002	Voucher	
	BLACKWELL	08/24/2003	MD002	Voucher	
	BLAKE	02/14/1993	MD002	Voucher	
	BOWE	09/23/1993	MD002	Voucher	
	BRINKLEY	07/28/2000	MD002	Certificate	
	BROWN	10/24/2004	MD002	Voucher	

- Lists individuals that may be receiving multiple rental subsidy

Multi-Subsidy Tenant Report Detail Reports

Summary Reports | Detail Reports

Member Information

Member SSN	
Member Last Name	ALEXANDER
Member DOB	01/16/2003
PHA Code	MD002
Program Type	Voucher
Project Code	
50058 Effective Date	08/24/2006
Type of Action	7-Other Change of Unit

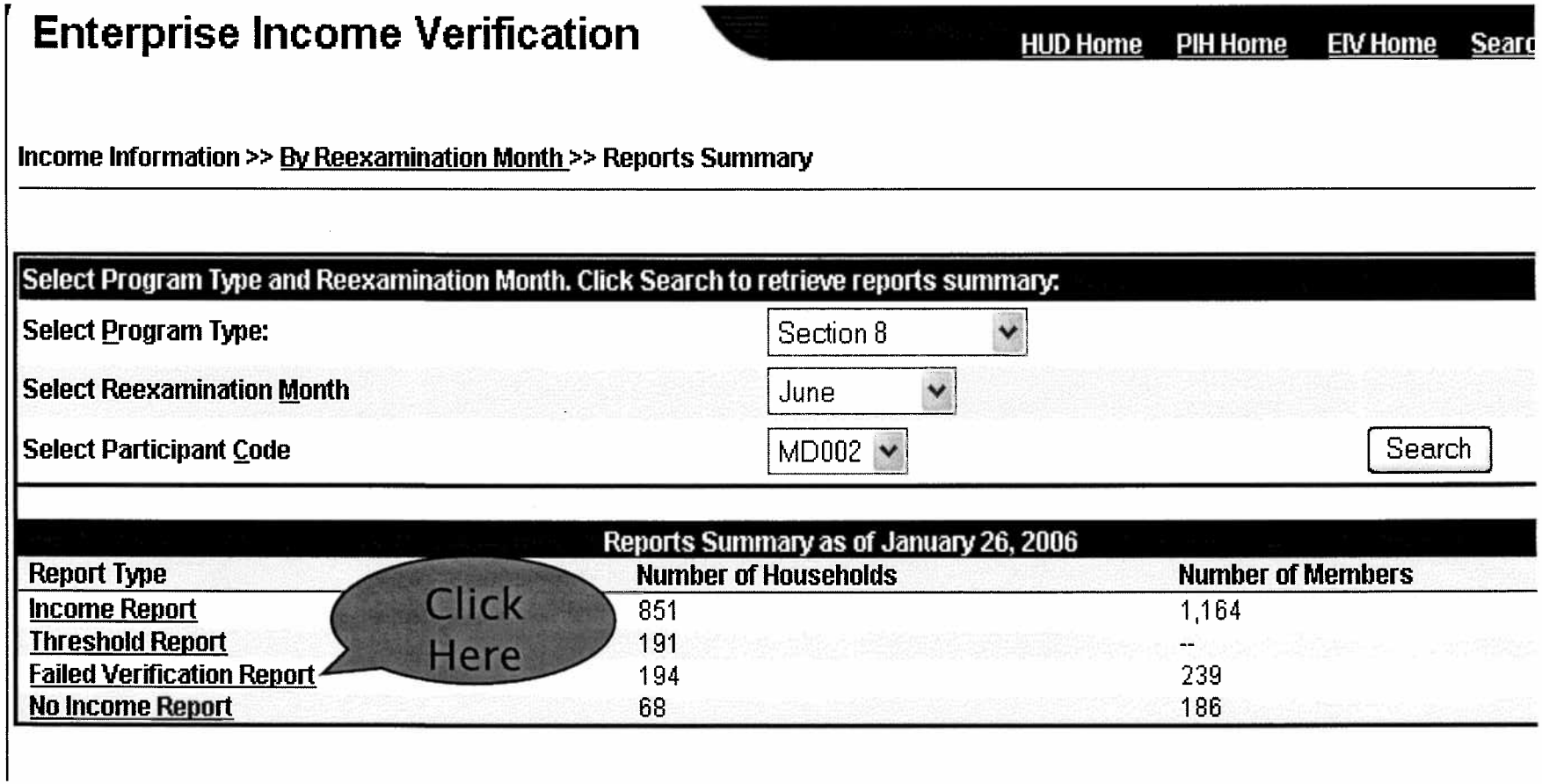
Household Information of Households Where ALEXANDER Receives Subsidy

HOH SSN	
HOH Last Name	Jackson
Program Type	Voucher
Relationship for the Member	Other youth under 18
PHA Code	MD002
Project Code	
Unit Address	, Baltimore , MD , 21216

HOH SSN	
HOH Last Name	ADAMS
Subsidy Type	
Relationship for the Member	
Contract Number	MD06H020056
Project Number	05235338
Unit Address	BALTIMORE , MD , 21230

Minor child, Alexander Diamond appears in HCV & MFH S8 household; Detail Report provides HOH SSN and unit address

Accessing the Failed Verification Report



Failed Verification Report

Income Information >> By Reexamination Month >> Reports Summary >> Failed Verification Report

Failed Verification Report

Participant Code:	MD002 Baltimore City Housing Authority
Program Type:	All PIH Programs
Reexamination Month:	July
Households that Failed Verification:	392

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1 2 3 4 5 6 7 8

51 - 100 of 392 Households

HH SSN	HH Name	HH DOB	Project
	BROWN	06/03/1979	MD002003 PERKINS HOMES

Member SSN	Member Name	Member DOB	Failed Verification Description
		06/03/1979	Verification failed - SSN not found in SSA records
		07/02/2000	Verification failed - SSN not found in SSA records

HH SSN	HH Name	HH DOB	Project
	WILLIAMS	12/29/1930	MD002044 WYMAN HOUSE

Member SSN	Member Name	Member DOB	Failed Verification Description
		12/29/1930	SSN is verified; individual is deceased 04/23/2002

HH SSN	HH Name	HH DOB	Project
	WILSON	05/11/1931	MD002059 VACANT HOUSE

Member SSN	Member Name	Member DOB	Failed Verification Description
		05/11/1931	SSN is verified; individual is deceased 10/17/2004

Accessing the Identity Verification Report

Use this report to see PHA statistics on tenant identity verification:

- Number & Percentage of tenants who failed/passed verification/not verified/
- Number of deceased tenants

Identity Verification Report

Verification Reports >> Identity Verification Report >> Report Selection

Identity Verification Report	
Program Type	All
Reexamination Month	All
Region	HQ

Identity Verification Report Statistics	
Number of households (excluding EOP)	3,079,713
Number of households with all members verified (Verified or Deceased)	2,729,167
Percentage of verified households	88.62%
Number of households where one or more members are Not-Verified or Failed	350,546
• Number of households Not-Verified (verification in process)	64,714
• Percentage of households Not-Verified	02.10%
• Number of households Failed	285,832
• Failed EIV Pre-screening	170,852
• Failed the SSA Identity Test	114,980
• Percentage of households Failed	09.28%
Number of household members	7,432,784
Total number of deceased members	12,770
Percentage of household members who are Not-Verified	02.00%
Percentage of household members who are Failed	05.92%

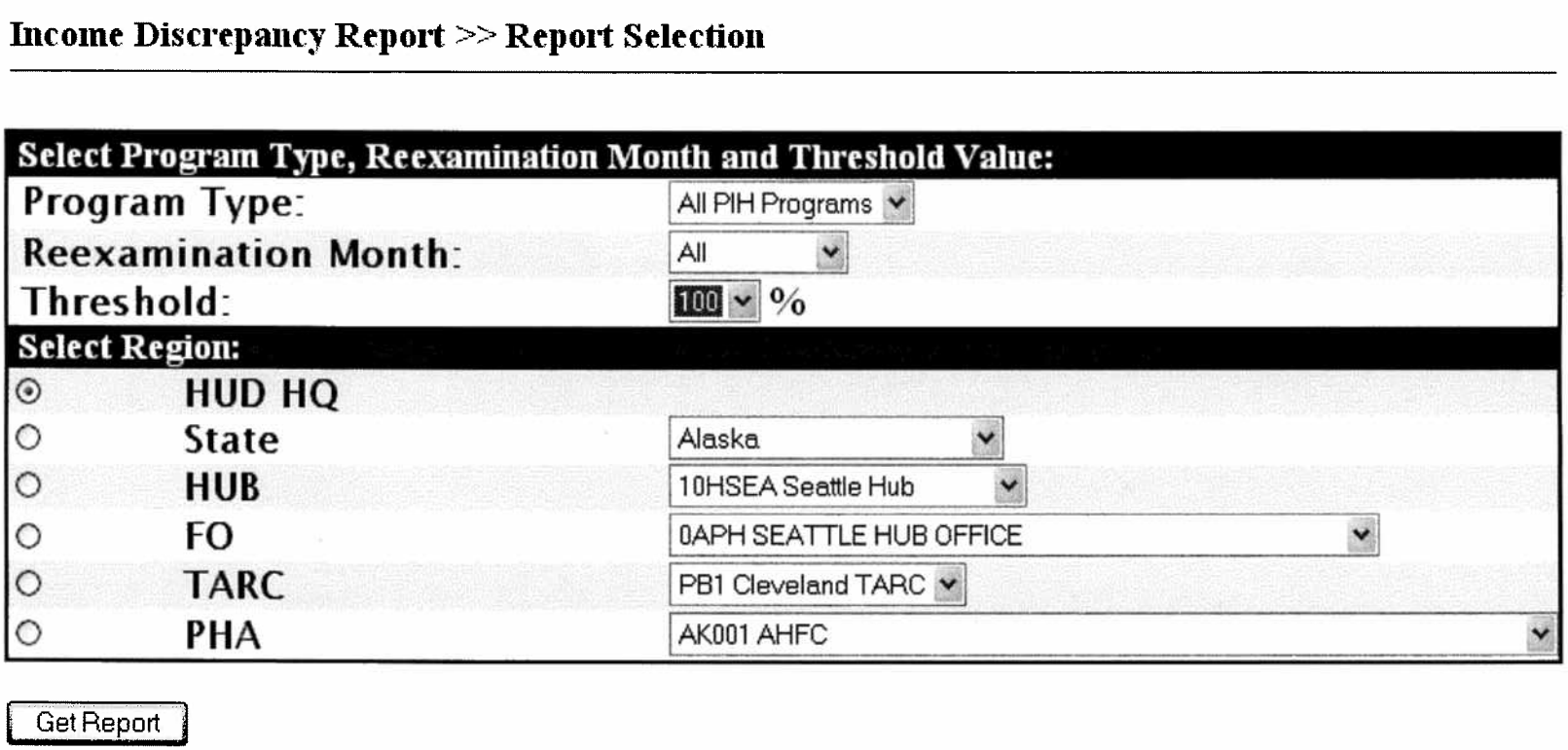
- New statistics category for number of deceased individuals (as of June 2007)

Accessing the Income Discrepancy Report

Use this report to identify families that **may** have substantially under reported household income

*Substantial: $2,400 annually

Income Discrepancy Report – Report Selection



Tip: Users should use 100% threshold level. The income discrepancy is most likely a valid income discrepancy at the highest (and higher) threshold levels!

Income Discrepancy Report
PHA Statistics

Income Discrepancy Report >> **Report Selection** >> **PHA Statistics**

PHA Statistics as of Jul 14, 2007			
PHA	MD002 Baltimore City Housing Authority		
Threshold Percentage	100 %		
Reexamination Month	July		
Program Type	**ALL**	**Public Housing**	**Section 8**
Total Number of Households Evaluated	0	0	0
Households that Exceed Threshold	93	10	83
Percentage of households exceeding threshold	00.00%	00.00%	00.00%
Outliers (Threshold * 2)	0	0	0
Percentage of households exceeding threshold that are outliers	00.00%	00.00%	00.00%
Net Annual Income Discrepancy (Actual)	($1,179,487.64)	($102,830.88)	($1,076,656.76)
Net Annual Income Discrepancy (Annualized Last Quarter)	($1,206,064.51)	($98,927.39)	($1,107,137.12)

Income Discrepancy Report Search by Project

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Project All Go

Select Project

Sorted By: **Annual Income Discrepancy (actual)** [Descending]
($24,972.41) - ($2,024.52)

1 to 10 of 10 Households

Income Discrepancy Report Summary

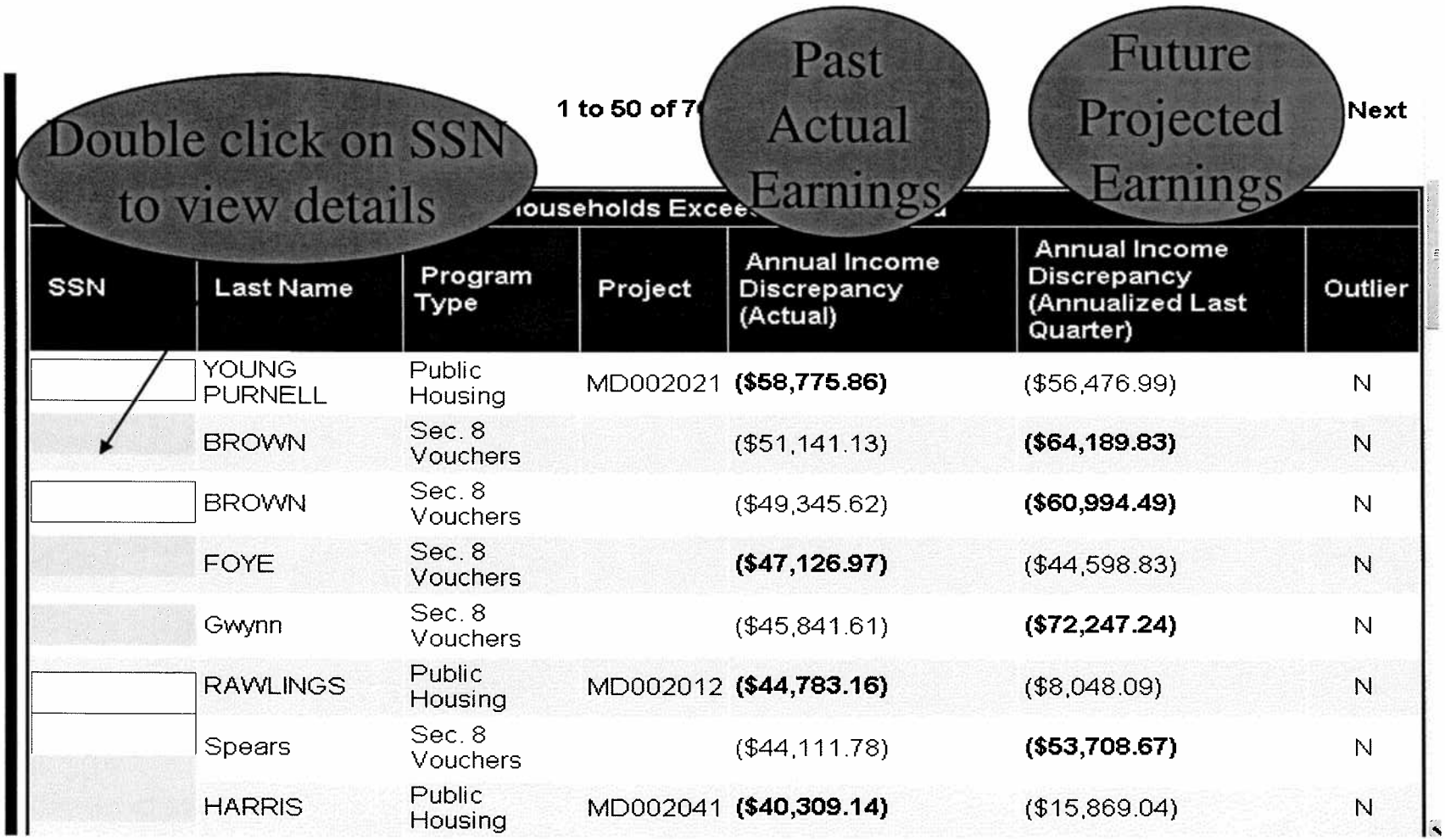
SSN	Last Name	Project	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Outlier
	YEARGIN	MD002009	**($24,972.41)**	($5,253.65)	N
	EVANS	MD002011	**($17,744.12)**	($7,374.77)	N
	HUNTER	MD002009	($13,332.43)	**($16,975.51)**	N
	BROOKS	MD002009	**($10,656.64)**	($9,230.56)	N
	JOHNSON	MD002001	($10,218.82)	**($10,609.49)**	N
	WALTON	MD002009	($9,134.14)	**($20,474.17)**	N
	MCCOWAN	MD002009	($8,060.43)	**($10,428.56)**	N
	THOMPSON	MD002006	($3,589.79)	**($9,536.31)**	N
	MOSLEY	MD002042	**($3,097.57)**	($1,658.28)	N
	PETERSON	MD002009	($2,024.52)	**($7,386.09)**	N

1 to 10 of 10 Households

Note: Income Discrepancy Report contains household discrepancies only for household members that successfully pass SSA Identity Verification test. These households may have potentially under-reported household incomes.

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

Income Discrepancy Report – Listing of Discrepant Households



SSN	Last Name	Program Type	Project	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Outlier
	YOUNG PURNELL	Public Housing	MD002021	**($58,775.86)**	($56,476.99)	N
	BROWN	Sec. 8 Vouchers		($51,141.13)	**($64,189.83)**	N
	BROWN	Sec. 8 Vouchers		($49,345.62)	**($60,994.49)**	N
	FOYE	Sec. 8 Vouchers		**($47,126.97)**	($44,598.83)	N
	Gwynn	Sec. 8 Vouchers		($45,841.61)	**($72,247.24)**	N
	RAWLINGS	Public Housing	MD002012	**($44,783.16)**	($8,048.09)	N
	Spears	Sec. 8 Vouchers		($44,111.78)	**($53,708.67)**	N
	HARRIS	Public Housing	MD002041	**($40,309.14)**	($15,869.04)	N

Tip: User may use this report to contact families who may have not reported all income as required

Income Discrepancy Report – Detail Household Report (Example)

Printer-Friendly Version

Summary Report | Income Report | Income Discrepancy Report

Head of Household Information		
Name:		
Social Security Number:		
Program Type:	Public Housing	
Project:	UPTOWN APARTMENTS	
Effective Date of Action:	07/01/2006	
Annual Reexamination Date:	01/01/2007	
Projected Annual Wages and Benefits from Form HUD-50058:	$0.00	
Period Of Income for Discrepancy Analysis	04/01/2005 - 03/30/2006	
Discrepancy Analysis	**Actuals**	**Annualized Last Quarter**
Reported Annual Wages and Benefits from EIV Data:	$93,857.31	$95,825.23
Amount of Annual Income Discrepancy:	($93,857.31)	**($95,825.23)**
Amount of Monthly Income Discrepancy:	($7,821.44)	($7,985.44)
Percentage of Income Discrepancy:	(100%)	(100%)

Note:Negative numbers represent potential under reporting of income. Please discuss this income discrepancy with the tenant. Positive numbers represent potential decrease in tenant income.

Confidential. Privacy Act Data. Civil and criminal penalties apply to misuse of this data.

UIV Income Discrepancy Analysis

$$\frac{\text{PIC} - \text{UIV}}{\text{UIV}} \quad \text{Example:} \quad \frac{\$0 - \$20{,}000}{\$20{,}000} = \mathbf{100\%}$$

Discrepancy amount = (**$20,000)**

- Current 50058 income data is analyzed weekly
- Compares PIC and UIV reported wages, unemployment benefits and social security benefits only
- Two discrepancy analysis calculated: actual & annualized last quarter (larger discrepancy in **bold**)
- Discrepancy must meet selected % threshold & $2,400+ (annual discrepancy amount) to be included on report

UIV Income Discrepancy Analysis (Continued)

- **Period of income for discrepancy analysis**
  - Identifies 12 month period of income considered for discrepancy calculation
- **Actual annual income discrepancy (<u>Past</u> actual earnings)**
  - Compares PIC *projected* wages and benefits to *actual* UIV data for a 12-month period (which ends 3 months prior to effective date of current 50058)
- **Annual income discrepancy: annualized last data quarter (<u>Future</u> projected earnings)**
  - Compares PIC *projected* wages and benefits to *projected* UIV annualized last quarter data (last quarter data X 4 to annualize) [Projection of income for 12 months which ends 9 months after effective date of current 50058]

Income Discrepancy Resolution

Federal Privacy Act
5 U.S.C 552a

- "In order to protect any individual whose records are used in a matching program, no recipient agency, non-Federal agency, or source agency may suspend, terminate, reduce or make a final denial of any financial assistance or payment under a Federal benefit program to such individual, or take other adverse action against such individual, as a result of information produced by such matching program, until the agency has independently verified the information."

Income Discrepancy Resolution

- Identify under reported income and/or unreported income sources
- **No** adverse action make be taken based ***solely*** on UIV data
- Review current and historical 50058s
- Verify effective dates of new and terminated income sources
- Discuss the income discrepancy with the tenant
- View past and current interim and annual reexamination documents in tenant file
- Obtain additional documents from tenant and/or third party (if necessary)
- Obtain Social Security Earnings Statement (SSA Form 7004) for historical wage earnings (Form available on HUD's website) for retroactive rent calculations

Is the Discrepancy Valid or Invalid?

- What was the effective date of the unreported income?
  - If effective date is prior to reexamination interview date and no interim increase policy – the discrepancy is valid
  - If interim increase policy and tenant did not report – the discrepancy is valid
- Does the PHA have an interim increase policy?
  - If yes, look at annualized last quarter income discrepancy amount
  - If no, look at actual income discrepancy amount

Valid Income Discrepancies
Tenant Misrepresentation of Income

- **<u>Valid Income Discrepancies:</u>** are those discrepancies where:
  - the tenant failed to disclose an income source and/or under reported the amount of income that was effective as of the interview date of a mandatory reexamination of income; **and/or**
  - the tenant failed to report a change or increase in an income source and/or income amount as required by PHA's interim reexamination policy.

<u>Note:</u> *These income discrepancies result in tenant rent underpayments and HUD subsidy overpayments*

Valid Income Discrepancies
PHA Error

- **Valid Income Discrepancy Due to PHA Error:**
  The PHA calculated household income based on the best available third party written verification, third party oral verification, and/or tenant provided documentation at the time of the reexamination interview. If the PHA had had access to UIV tools, the PHA would have made a more accurate income determination
    - ***Retroactive rent repayment agreement not required***
- In cases where the PHA obtains additional income information via the EIV system (and verifies the UIV data with the tenant and/or 3rd party source) that would result in a more accurate income determination and the PHA policy allows for increases in rent (in between annual reexaminations), the PHA should adjust the rent accordingly to reduce the occurrence and amount of improper subsidy payments

Note: *These errors result in HUD subsidy overpayments*

Invalid Income Discrepancies

- **<u>Invalid Income Discrepancies:</u>** are those discrepancies that are not a result of tenant error. These discrepancies may occur as a result of:
  - PHA error
  - Administrative circumstances
  - Incorrect UIV data

Examples of Invalid Income Discrepancies

- **PHA Errors:**

50058 Reporting Errors on Section 7:

- Income amount reported incorrectly
- Income source reported incorrectly
- Earned Income Disallowance (EID) reported incorrectly
- Omitted income

Examples of Invalid Income Discrepancies

- **Administrative Circumstances:**
  - No interim increase policy (income effective after reexam interview/processing date; tenant **not** required to report increase in income)
  - Recent decrease in income, verified by PHA

Examples of Invalid Income Discrepancies (Continued)

UIV Data Errors:

- There has been an incident of identity theft and someone else is using the tenant's SSN – ***only the employer can correct this error***
- The income reported under a social security number is incorrectly listed under the tenant's SSN (example, employer error) – ***only the employer can correct this error***
- The tenant has willingly allowed someone else to use his/her SSN – ***only the employer and tenant can correct this error***

Visit HUD's Web Page For More Information on UIV

www.hud.gov/offices/pih/programs/ph/rhiip/uiv.cfm

For Help with the EIV System

REAC_TAC HUD.GOV
Or Call (888) 245-4860

PHA EIV Access – contact the UIV Coordinator at your local HUD Field Office

HUD Staff & OIG Special Assistance:
Nicole Faison: (202) 708-0744
Email: Nicole.Faison@HUD.GOV

Linda Scott: (202) 402-4028
Email: Linda.Scott@HUD.GOV

Question & Answer Session with Subject Matter Expert

Nicole Faison, Director

Office of Public Housing Programs

Thank You For Watching This EIV Training Session!

U.S. Department of Housing & Urban Development

Office of Public and Indian Housing

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