

Purpose

The Enterprise Income Verification (EIV) systems 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, minimized 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 instructions and information on acceptable use, disposition, and storage of data obtained through the EIV System.

Statement

CCH Management's use of EIV reports reduces the overall burden of verification of income claimed by residents participating in HUD programs. These reports are only to be used as described in this policy and under no circumstances available for use as a tool to verify or monitor compliance for other programs such as Low-Income Housing Tax Credits (Section 42) or Rural Development (515).

Objective

To identify the reporting functions, proper timelines, and staff procedures when gaining access and routine use in EIV to reduce errors and omissions in calculating rents while ensuring all applicants and residents are treated fairly and are not being discriminated against.

Penalties

CCH will incur penalties for not accessing or using the EIV system in its entirety:

- Findings on the Management and Occupancy Review (MOR) report, but can be identified at times other than at the time of MOR; or
- When a change in ownership/management, new owner/manager must obtain access and begin using the EIV system within 90 days from the date the owner takes possession or the effective date of the management agreement with owner.
 - Five (5) percent decrease in voucher payments on the month following the date of violation and each subsequent month until cured.
 - Adjustment must be made on the next voucher to adjust for the decrease.
 - Will be monitored by the Contract Administrator to ensure adjustment is made.
 - Thirty (30) days to cure violation



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

Purpose	1
Statement	1
Objective	1
Penalties	1
Resources	4
Part I - Security	5
EIV Security Introduction	5
EIV Safeguards	6
Technical Safeguards	6
Administrative Safeguards	6
Physical Safeguards	7
Security Awareness Training	9
Access to EIV	11
EIV System Coordinators	11
EIV Users	11
EIV Rules of Behavior	11
Computer System Security Requirements	12
User Names, Passwords, and Password Changes	12
Disclosure of EIV Information	13
Use and Handling of EIV Data	15
EIV Printouts – Staff with EIV Access	15
EIV Printouts – Staff without EIV Access	15
EIV Printouts – Auditors	16
EIV Printouts – Residents	16
Electronic Storage of EIV Information	17
Disposal of EIV Information	17
Reporting Improper Disclosures	17
Part II – General Use	18
General EIV Administration	18
Required Consent for Release of Information	18
Responsible Parties	18
EIV Reports	19
Table of EIV Reports	19
REPORT CAUTION	19
Retention of EIV Data and Reports	20
Security Binder/File	20
Master Reports Binder/File	20
EIV Discrepancy Log	20
Applicants	21
Existing Tenant Search (ETS)	21
Resident Income Reports	23
Summary (S)	23
Income (I)	26
Income Discrepancy (ID)	31



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

Repayment Options _____	37
Resident Other Reports _____	38
New Hires (NH) _____	38
Multiple Subsidy (MS) _____	41
Identity Verification (IV) _____	46
Deceased Tenants (DT) _____	50
Reports Not Ran by CCH Management _____	53
No Income Reported by HHS or SSA Report _____	53
No Income Reported on the 50059 _____	53

EXHIBIT A

Acknowledgement of Security and Privacy Policies

EXHIBIT B

Privacy Policy for Auditors

EXHIBIT C

HUD Secure Systems Access Guide

EXHIBIT D

EIV Security Binder, Checklist, & Configuration

EXHIBIT E

Discrepancy Log

EXHIBIT F

Document Destruction Log

Resources

Current resources include, but are not limited to:

1. EIV Websites:

- HUD's EIV Website for the Multifamily Housing Industry:
https://www.hud.gov/program_offices/housing/mfh/rhiip/eiv/eivapps
- HUD's EIV Training Outreach Website:
https://www.hud.gov/program_offices/housing/mfh/rhiip/eiv/eivtraining
- HUD's Rental Housing Integrity Improvement Website:
https://www.hud.gov/program_offices/housing/mfh/rhiip/mfhrhiip

2. EIV Guidance

- HUD Handbook 4350.3:
<https://www.hud.gov/sites/documents/43503HSGH.PDF>
- Rent and Income Quality Control Monitoring Guide:
https://www.hud.gov/sites/documents/DOC_20477.pdf
- EIV User Access Authorization Form:
<https://www.hud.gov/sites/documents/90012.pdf>
- EIV and You Brochure:
https://www.hud.gov/sites/documents/DOC_7877.pdf

Part I - Security

EIV Security Introduction

The EIV Database is part of HUD's Secure Systems Database. Individual users must use their own user name (WASS ID) and password to access the Secure Systems database. The CCH Secure Systems Coordinators are Director of Compliance and Associate Director of Asset Management and the CCH EIV Coordinators are the Director and Associate Director of Compliance.

The Director of Compliance will have the responsibility of ensuring compliance with the security policies and procedures outlined in this document. These responsibilities include:

- CCH Secure Systems Coordinator
- Maintaining and enforcing the security procedures
- Keeping records and monitoring security issues
- Communicating security information and requirements to appropriate personnel including coordinating and/or conducting security awareness training sessions.
- Conducting reviews of all User IDs issued to determine if the users still have a valid need to access EIV data and taking necessary steps to ensure that access rights are revoked or modified as appropriate.
- Reporting any evidence of unauthorized access or known security breaches to appropriate parties including Contract Administrators and/or HUD.

EIV Safeguards

Technical Safeguards

In order to comply with Technical Safeguards:

- Each coordinator/user must have a valid WASS ID and password
- Passwords must not be shared.
- No one may access the system using another user's identity
- Each user must provide an application access authorization form (UAAF or CAAF).
- Access to data is restricted based on EIV role (Coordinator or User)
- Access is limited based on need to know
- Users understand that access and activity are monitored and audited

Administrative Safeguards

In order to comply with Administrative Safeguards:

- The owner/agent has established standard operating procedures for use of data
- Employment and income data are used for certification and compliance purposes only
- Users may not share data with others who do not have a need to know
- Users will check to see if applicant/tenant is receiving assistance under another program at a difference location
- CCH EIV Coordinator will monitor access:
 - Obtain and retain owner approval letters
 - Approved/current signed access authorization forms
 - Conduct periodic reviews to see if users still have valid need to access
 - Assign, modify, or revoke rights as appropriate
 - Ensure access rights and responsibilities are appropriate
- Ensure that a signed copy of forms HUD-9887 and HUD-9887-A are on file for all adults living in the unit.
- Destroy EIV information when it is no longer needed.
- Ensure all EIV users receive security training at time of implementation and at least annually thereafter
- Communicate security information: Posters, Security bulletins, discussion groups, distribution of EIV manuals.

- Detect, deter, and report improper disclosures, unauthorized access, or security breaches to the CCH Secure Systems Coordinators and CCH EIV Coordinators who will report as necessary to:
 - HUD's Multifamily Help Desk at 800-767-7588, TDD 800-927-2589, or Mf_EIV@huduser.gov
 - HUD's Security Officer
 - TRACS/EIV mailbox: MFTRACSSecurity@hud.gov
 - Mail to: Department of Housing and Urban Development Office of Multifamily Housing
 - Notify the Office of Inspector General (IG), email at Hotline@hudoig.gov

Physical Safeguards

In order to comply with Physical Safeguards:

- Designation of secure areas
- Restricted use of printers, copiers, facsimile machines, etc.
- Controlled access to areas containing EIV information
- Securing computer systems and output by:
 - Converted EIV data to an electronic format must be encrypted
 - Emails containing EIV data must be encrypted
 - Soring downloaded EIV data must be in separate restricted access location
 - Label auxiliary and secondary storage containing EIV data "confidential" or "For Office Use Only"
 - Lock in secure place
- Users must retrieve all computer print outs as soon as they are generated so that EIV data is not left unattended, and
 - Keep printouts locked up
 - Printouts should not be transported from premises
- Avoid leaving a computer unattended with EIV data displayed on screen
- Lock computer/log off/exit the system when not present or finished for the day (EIV will time-out after 30 minutes of inactivity).
- Use a password-protected screensaver
- Secure disposal of EIV information:
 - Destroy as soon as it has served its purpose or as prescribed by HUD's policies and procedures



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

- Burn/Shred
- Keep log of destroyed data that contains dates, method, and person of destruction.

CCH will only place resident files containing EIV data in “restricted areas.” Restricted areas will contain locked metal file cabinets either within a locked file room or within the community manager or assistant community manager’s office. Only staff with permission to print and/or view EIV data will have access to the filing cabinet keys. Filing cabinets will be kept locked when not in use. Restricted areas will be clearly identified by posted signs or other indicators. For example, a sign reading “Employees Only” posted on the door to the locked file room or manager office. Restricted areas will be separated from non-restricted areas by physical barriers that control access and/or will have limited points of entry.

DRAFT FOR COMMENT

Security Awareness Training

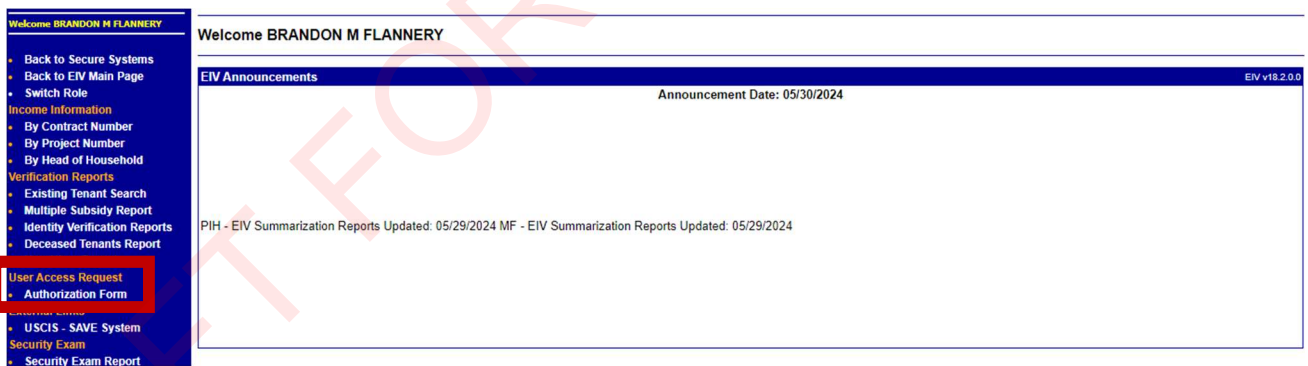
Security Awareness Training is a crucial aspect of ensuring the security of the EIV System and Data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation. Before granting access to the EIV information, each person must be trained in EIV Security Policies and Procedures and obtain a Cyber Security Awareness Challenge Certificate.

All CCH employees having access to EIV data are required to complete the online HUD Cyber Awareness Training, print out the Certificate, print name, sign, scan and submit to the CCH EIV Coordinators, and store original in the property's EIV Security Binder/File. Additionally, all CCH employees are required to attend a quarterly EIV training where HUD's Cyber Awareness Training is presented to the group.

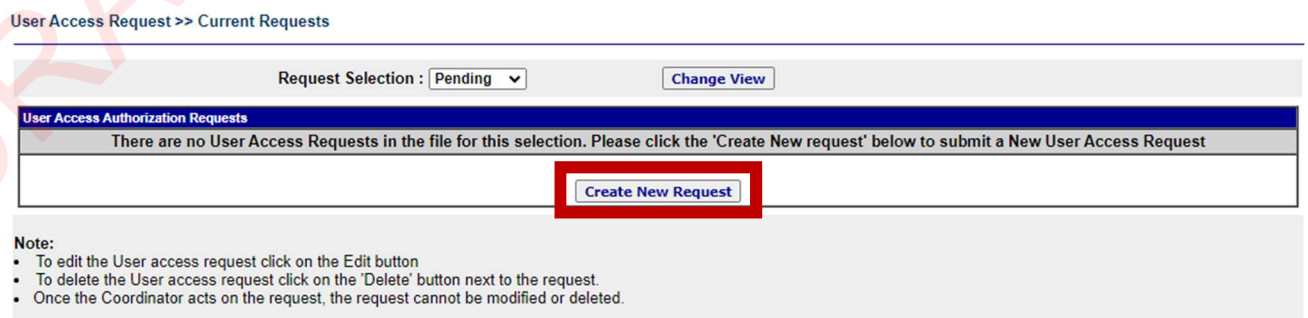
After initial setup, coordinators must certify annually and users must certify semi-annually. This is done electronically, through EIV. Copies of the CAAF (coordinators) and UAAF (users) must be printed and placed in the property's EIV Security Binder/File and available for review during the Management & Occupancy Review (MOR).

To complete the certification:

1. Log into EIV
2. Click on Authorization Form from the menu on the left side



3. Click the button to Create New Request



User Access Request >> Current Requests

Request Selection : Pending

User Access Authorization Requests

There are no User Access Requests in the file for this selection. Please click the 'Create New request' below to submit a New User Access Request

Note:


- To edit the User access request click on the Edit button
- To delete the User access request click on the 'Delete' button next to the request.
- Once the Coordinator acts on the request, the request cannot be modified or deleted.

4. Fill in all fields indicated with an asterisk, acknowledge, and submit request.

User Access Request >> User Access Authorization Form (UAAF)

Enterprise Income Verification (EIV) System User Access Authorization Form

Date of Request:	05/30/2024
User ID:	
User Role:	HSU
User Name:	
Phone Number:	
Fax Number:	
Email Address:	*****@*****.org <small>(***** email address is valid in WASS.)</small>
Type of Action Request:	Select one... <input type="button" value="Select"/>
Contract / Project Number:	
Position Title:	*
Type of Work Which Involves the Use of Upfront Income Verification (UIV) Data that is Contained in the EIV System:	<input type="radio"/> Property Owner <input type="radio"/> Management Agent <input type="radio"/> Service Bureau <input type="radio"/> Contract Administrator
User Affiliation:	
Required Fields	
<input type="checkbox"/> Acknowledgement:	
I understand and agree to follow all HUD standards, policies, and procedures.	
<input type="button" value="Submit Request"/> <input type="button" value="Cancel Request"/>	



Access to EIV

EIV System Coordinators

Before accessing EIV, CCH Secure Systems Coordinators will obtain a letter/memo from each property owner indicating that the owner gives permission for the CCH EIV Coordinator to act as the EIV Coordinator. Once that permission is obtained, the Coordinator will:

1. Review the EIV training material provided by HUD
2. Participate in EIV Security Training from the online Cyber-Awareness Challenge training program
3. Read and sign the CCH EIV Use and Security Policies and Procedures

Upon completion of these tasks, the EIV Coordinator will submit to HUD, the appropriate Coordinator Access Authorization Forms. Upon receipt of HUD approval, the EIV Coordinator will complete the EIV Coordinator setup process.

EIV Users

Before request a WASS ID and EIV user access, future EIV Users will:

1. Participate in EIV Security Training from the online Cyber-Awareness Challenge training program.
2. Read and sign the CCH EIV Use and Security Policies and Procedures

Upon completion of these tasks, staff will request a WASS ID, then submit, to the EIV Coordinator, the appropriate User Access Authorization Form. The CCH EIV Coordinator will complete the appropriate steps to provide EIV access to the user. In accordance with HUD requirements, the user's need for access will be reviewed on a semiannual basis.

At least once every twelve months, staff with EIV access will be required to participate in training through the online Cyber-Awareness Challenge training program.

EIV Rules of Behavior

All EIV users and coordinators who have access to the EIV system must adhere to the EIV Rules of Behavior (ROB) signed at the time of request access to the EIV system.

1. Instructions for requesting access to the EIV system for both internal HUD users and external users are posted on the Multifamily EIV website at:

https://www.hud.gov/program_offices/housing/mfh/rhiip/eiv/eivapps

2. The signed initial and current online (unsigned) access authorization forms containing the ROB must be kept on file along with the owner approval letters in the property's EIV Security Binder/File. Upon request the forms must be made available to entity monitoring EIV system compliance.
3. Users without EIV system access but view EIV reports for their job function are required to sign the ROB and keep a copy for their records and on file in the property's EIV Security Binder/File.

Computer System Security Requirements

All computer systems and computers will have password restricted access with the following criteria:

- No fewer than 8 characters
- Contain at least one lower case letter
- Contain at least one upper case letter
- Contain at least one number
- Contain at least one special character (such as dash or exclamation point)

CCH will also use Antivirus software to limit data destruction or unintended transmission via virus, worms, Trojan horses, or other malicious means. Remote access by other computers other than those specifically authorized is prohibited.

Authorized users of EIV data are directed to avoid leaving EIV data displayed on their computer screens where unauthorized users may view it. A computer will not be left unattended while the user is "logged in" to Secure Systems. If an authorized user is viewing EIV data and an unauthorized user approaches the work area, the authorized user will lessen the chance of inadvertent disclosure of EIV data by logging out of Secure Systems or minimizing or closing out the screen on which the EIV data is being displayed.

EIV data may be converted to an electronic format only if the information is stored in a special, password restricted, password protected directory, and only if the data is encrypted using an NIST compliant vendor as approved by CCH. All emails that contain EIV data must be encrypted. EIV data converted to an electronic format must be destroyed in accordance with HUD's recordkeeping requirements and HUD's data share agreement with HHS and SSA.

User Names, Passwords, and Password Changes

Many systems require frequent change to passwords. Secure Systems/EIV passwords will be changed in accordance with HUD Secure System requirements. Users will not share passwords with any other employee or with anyone outside the organization. EIV access granted to an employee or authorized user will be revoked when access is no longer required or prior to termination of that employee or user to ensure data safety.

Termination of EIV access and un-assigning property access through Property Assignment Maintenance is required. The CCH EIV Security Binder/File will be documented to indicate when user access was terminated by the CCH EIV Coordinator.

Disclosure of EIV Information

The EIV Social Security (SS), Supplemental Security Income (SSI), new hires (W-4), wage, and unemployment compensation information contained in the EIV systems may only be used for limited official purposes:

- By Owner/Agent's authorized EIV users for verifying the employment and income at the time of recertification and for reducing administrative and subsidy payment errors.
- By Contract Administrators (PBCAs and TCAs) and HUD staff for monitoring and oversight of the resident recertification process.
- By IPAs, when hired by an owner to perform the financial audit of the project, for use in determining the accuracy for the rent and subsidy calculations.
- By the Office of the Inspector General (OIG) for investigative purpose.
- Disclosure of EIV information to individuals who are assisting in the recertification process and who are present during the recertification interview and process.

EIV data may be disclosed to:

- Private owners
- Management Agents
- Service bureaus
- Contract Administrators
- HUD Staff
- HUD Office of Inspector General (OIG) for investigative purposes
- Individuals to whom the record pertains

Under no circumstances may users or coordinators share EIV data by providing access to the EIV system by sharing user name and password combination to others. CCH's authorized EIV users and coordinators must not disclose data in any way that would violate the privacy of the individuals.

The Federal Privacy Act (5 USC 552a, as amended) prohibits the disclosure of an individual's information to another person without the written consent of such individual. 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 recertification process, unless the individual has provided written consent to disclose such information. The Tenant Consent to Disclose EIV Income Information has been developed for this purpose. Users are not prohibited from discussing with the head of household and showing the head of household how the household's income and rent were determined based on the total income presorted and verified.



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EIV data must not be disclosed (or re-disclosed) to any third parties such as the local Welfare office, DFCS, etc. Willful disclosure or inspection of EIV data can result in civil and criminal penalties:

- Unauthorized disclosure – felony conviction and fine up to \$5,000 or imprisonment up to five (5) years, as well as civil damages.
- Unauthorized inspection – misdemeanor penalty of up to \$1,000 and/or one (1) year imprisonment, as well as civil damages.

Official use does not include:

- Using or sharing the EIV information for certifying resident under the Low-Income Housing Tax Credit (LIHTC) or Rural Housing Services (RHS) Section 515 programs. Neither the Internal Revenue Service (IRS) nor RHS are a party to the computer matching agreements UD has with the Department of Health and Human Services (HHS) and with the Social Security Administration (SSA).
- Disclosure of the EIV information to Service Coordinators even through tenant signature of release of information consent from authorizing the Service Coordinator to have access to their file is not allowed unless the Service Coordinator is present during the recertification interview and assisting the tenant with the recertification process. The status authorizing the computer matching identifies those parties to whom the information can be disclosed, and the statute does not include Service Coordinators.
- Disclosure of EIV information to consultants hired by the community or management company to audit tenant files and company procedures. The statute authorizing the computer matching identifies those parties to whom the information can be disclosed, and the statute does not include outside consultants not involved in the recertification process.

The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs does not permit that federal agency to use or view information from the EIV system for certifying resident for their programs or for monitoring purposes.

Use and Handling of EIV Data

EIV Data serves two purposes: (1) Verification of specific income information provided by the resident and (2) Monitoring resident and staff compliance. EIV Data will be used only to administer HUD programs and not used to assist with eligibility determination or compliance monitoring for any other programs, including those administered by the IRS (Tax credit) or Rural Development (515).

EIV Printouts – Staff with EIV Access

Reports available through EIV will not be printed to a shared printer unless the EIV user plans to immediately retrieve the data and it is preferred that all EIV printouts are sent to the user's personal printer, when possible. EIV printouts will be stored in the resident file for the term of tenancy and for three year after tenancy ends.

When the property also participates in other housing assistance programs, CCH users and coordinators will take special precautions to ensure the security of the EIV printouts. EIV printouts will be maintained in the resident file, but kept in a separate section that will be removed if the file is to be audited or reviewed by any authorized party for purposes other than those defined by HUD.

EIV Printouts – Staff without EIV Access

CCH staff members are approved to view EIV information if they are involved in the resident certification process; however, restrictions on disclosure requirements are:

- Use EIV information only in the performance of official HUD business
- Protect copies of sensitive data and destroy system-related records in accordance with HUD established requirements to prevent reconstruction of contents.
- Not disclose (willfully or otherwise) EIV information in any way that would violate the privacy of individuals.
- Ensure there are signed and valid forms HUD-9887 and HUD-9887-A (Notice and Consent for the release of Information) on file before reviewing an individual's confidential EIV income information.
- Report incidents or suspected incidents which involve breach of EIV information to the HUD National Help Desk at 1-888-297-8689.
- Only access EIV income information within hard copy files and only within the property offices or CCH Management offices.
- Not enter EIV income information on any portable media.
- Sign non-disclosure oaths (Rules of Behavior) that the EIV income information will be used only for the purpose of the audit.
- Sign the CCH Use and Security Policies and Procedures



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

- Not duplicate EIV income information or re-disclose EIV income information to any user not authorized by Section 435(j)(7) of the Social Security Act to have access to EIV income data.

EIV Printouts – Auditors

Independent public auditors (IPAs) are approved to view EIV information, when hired by an owner to perform the financial audit of the project, for use in determining the owner's compliance with verifying income and determining the accuracy of the rent and subsidy calculations; however, restrictions on disclosure requirements are:

- Only access EIV income information within hard copy files and only within the offices of the CCH Management
- No transmit or transport EIV income information in any form
- Not enter EIV income information on any portable media
- Sign non-disclosure oaths (Rules of Behavior for Non-System Users) that the EIV income information will be used only for the purpose of the audit
- Sign the CCH Use and Security Policies and Procedures
- Not duplicate EIV income information or re-disclose EIV income information to any user not authorized by Section 435(j)(7) of the Social Security Act to have access to the EIV income data.

NOTE: IPA means a Certified Public Accountant or a licensed or registered public accountant, having no business relationship with the private owner except for the performance of audit, systems work, and tax preparation. If not certified, the IPA must have been licensed or registered by a regulatory authority of a State or other political subdivision of the United States on or before December 31, 1970. In states that do not regulate the use of the title "public accountant," only certified public accountants may be used.

EIV Printouts – Residents

If residents request copies of their own EIV printout, a copy will be produced and the staff person providing the copy will note that the printout is a copy provided to the resident upon request. The note will be stamped with the following:

THIS IS NOT AN ORIGINAL
 COPY TO: _____
 ON _____, _____
 BY _____
 Resident Initials _____



POLICIES AND PROCEDURES HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

Electronic Storage of EIV Information

In some cases, there may be a need to end or store EIV information electronically. In these cases, all electronic versions of EIV information will be encrypted. If there is need to store the information on a hard drive, a specific folder will be created and the folder will be password protected to prevent unauthorized access. Information in the folder will be purged periodically to comply with HUD's EIV file retention policies. If EIV information is copied to portable media, that portable media will be destroyed appropriately upon completion of the intended use and documentation of the destruction will be maintained in the EIV Security Binder/File.

Disposal of EIV Information

EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices, or as prescribed by the CCH EIV Use and Security Policies and Procedures.

Reporting Improper Disclosures

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and sharing of passwords.

Upon the discovery of a possible improper disclosure of EIV information or other security violation by an employee or any other person, the individual making the observation or receiving the information will contact the CCH EIV Coordinator and the CCY Secure Systems Coordinators who will document all improper disclosures in writing providing details including who was involved, what was disclosed, how the disclosure occurred, and where and when it occurred. The CCH EIV Coordinators will immediately review the report of improper disclosure, and if appropriate, the EIV Coordinator will remove EIV access.

ALL EMPLOYEES MUST CAREFULLY REVIEW THE EIV ACCESS AUTHORIZATION FORM OR THE RULES OF BEHAVIOR TO UNDERSTAND THE PENALTIES FOR IMPROPER DISCLOSURE OF EIV DATA.

Part II – General Use

General EIV Administration

Required Consent for Release of Information

Under no circumstances can an EIV Income Report be reviewed or printed without a signed Authorization for the Release of Information (Form HUD-9887 and HUD-9887-A). Effective January 1, 2024, per HOTMA final rule, all applicants must sign the consent form at admission, and participants must sign the consent form no later than their next interim or regularly scheduled income reexamination and they do not need to sign and submit subsequent consent forms at the next interim or regularly scheduled income examination except under the following circumstances:

- When any person 18 years or older becomes a member of the family
- When a member of the family turns 18 years of age (signed at their next regularly scheduled reexamination)
- As required by HUD or the MFH Owner administrative instructions (see Resident selection Criteria)
- Revocation of Consent for Release of Information

Revocation of Consent for Release of Information will prohibit CCH from requesting and accessing income information and financial records, including pulling EIV reports and using EIV data to verify income (although the data matches between HUD and other agencies will continue to occur automatically if the family is not terminated from the program). Revocation of Consent for Release of Information will result in the termination of assistance or denial of admission, per CCH discretion, see Resident Selection Criteria for more information.

Responsible Parties

EIV reports will be produced according to the schedule attached and reviewed by the property staff member responsible for (1) HUD eligibility determination and/or (2) HUD discrepancy analysis.

Reports will be produced, secured, and maintained in accordance with CCH EIV Use and Security Policies and Procedures and reviewed by Compliance Department staff to ensure that this policy is being followed.

When information in EIV indicates potential errors in the eligibility determination or assistance calculation, documentation of the investigations of such errors will be maintained in the resident/applicant file and EIV Discrepancy Log.

EIV Reports

Table of EIV Reports

#	Report Name	Purpose	Frequency
ETS	Existing Tenant Search	Identifies active/ existing assistance	At Admission/ Application Processing
S	Summary	Provides identity verification	Monthly ARs and every IC and IR
I	Income	Provides employment income	Monthly ARs and every IC and IR
ID	Income Discrepancy	Identifies discrepancy in wage, unemployment and SSA benefit information	Monthly
NH	New Hires	Identifies new employment	Monthly
MS	Multiple Subsidy	Identifies multiple assistance	Monthly
IV	Identity Verification Failed Prescreening/ Verification	Identifies missing or invalid personal identifiers pre and post matching with SSA database.	Monthly
DT	Deceased Tenants	Identifies deceased individuals reported by SSA	Monthly
XIS	No Income by HHS or SSA	Identifies no income via HHS/SSA	Not ran by CCH
XI5	No Income on 50059	Identifies no income on 50059	Not ran by CCH

REPORT 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, CCH Staff must separate the reports by household.



POLICIES AND PROCEDURES HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

Retention of EIV Data and Reports

Copies of all reports, notes, investigations, clarification, and verifications must be maintained in the resident files throughout tenancy plus three years and destroyed at the time the tenant file is destroyed by shredding, burning, or pulverizing.

EIV printouts kept in the Master Binder files will be destroyed by burning, shredding, or pulverizing after three years; as each new report is added to a Master Binder file, any report that is older than three years will be removed and destroyed.

EIV Existing Tenant Search reports for applicants who did not move-in will be retained for three years and then be destroyed by burning, shredding, or pulverizing.

Security Binder/File

Copies of all Owner Approval Letters, Coordinator Access Authorization Forms, CCH's EIV Use and Security Policies and Procedures, User Access Authorization Forms, Certificate for Cyber Security Awareness, CCH EIV Privacy Policy, and HUD Rules of Behavior must be kept in the CCH Security Binder. Staff should use the EIV Security Document Checklist – **See Exhibit D.**

Master Reports Binder/File

Copies of all Reports must be kept in the Property's Master Reports Binder, by month and year, for the current year plus two prior years, and in the following order: (1) EIV Discrepancy Log (**See Exhibit E**), (2) Multiple Subsidy, (3) Failed EIV Pre-Screening, (4) Failed Verification Report, (5) Deceased Tenants, (6) New Hires, (7) Income (summaries and discrepancies), and (8) EIV Document Destruction Log (**See Exhibit F**)

EIV Discrepancy Log

EIV Discrepancy Logs are used to monitor the monthly reports and record responses to unresolved EIV discrepancies throughout the year. Since all EIV errors are not the result of errors in TRACS or resident non-compliance, it is helpful to maintain a record of response to errors in one place. EIV Discrepancy Logs will be maintained by each calendar year and month, retained for five years and then destroyed.

Information tracked on the EIV Discrepancy Log includes: HOH Name, Unit Number, Name of Member with Discrepancy, Brief Description of Discrepancy, Date Notice Sent, Date Meeting Scheduled, Resolution, Close Date, and Miscellaneous Notes – **See Exhibit E.** More detailed information is maintained in the resident file.



Applicants

Existing Tenant Search (ETS)

REPORT USE

The ETS is the only EIV report available that provides information about applicants. As part of the application process, all applicants **MUST** disclose if they are currently receiving HUD housing assistance on the community application. CCH Management will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted unit.

Nothing prohibits a HUD housing assistance recipient from applying to our properties; however, the applicant must move-out of the current property and/or forfeit any HUD voucher before HUD assistance at a CCH Property will begin. Special considerations apply to minor children where both parents share 50% custody, to applicants who are part of a “split” household, and to applicants for housing in a property that is not 100% subsidized.

REPORT PROCEDURE

CCH requires that all communities run the EIV Existing Tenant Search for all adult household members as part of the verification process prior to approval of the applicant household.

If the applicant or a member of the applicant's household is residing at another subsidized location, property staff must discuss this with the applicant and give the applicant the opportunity to explain any circumstances relative to the situation. This may be a case where the applicant wants to move from their existing location or where two assisted families share custody of a minor child.

If it is determined that the applicant is moving from another subsidized apartment, community staff must request documentation showing that the applicant has notified their landlord that they are moving to your property, and on day of move-in, the applicant must provide proper documentation which shows that he move-out date for the former residence is the day before the move-in date at your property.

Without proper documentation, the applicant must not be allowed to sign their leasing documents and move-in. Proper documentation includes but is not limited to:

- Move-Out Inspection Form
- Move-Out HUD-50059A
- Written correspondence from former landlord

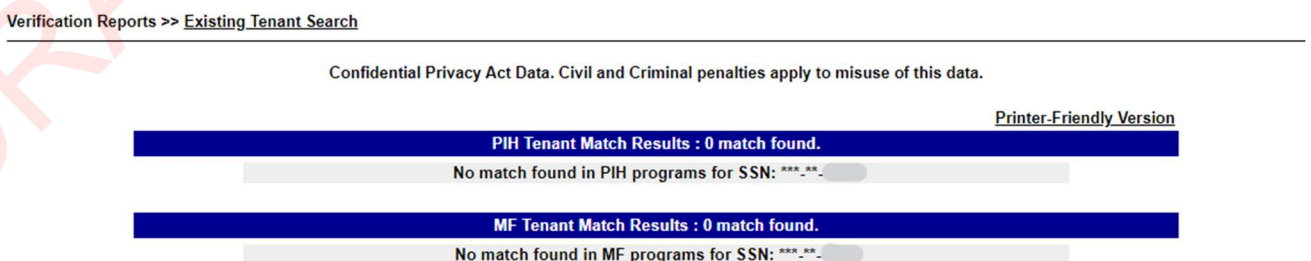
HUD Guidance states that when a resident move-out prior to 12:00 PM, the move-out date should be entered as the previous day and if after 12:00 PM, the moveout date will be the actual date of move-out. It is important to note that the move-out and move-in dates cannot be the same day. In the case where the move-out occurred after 12:00 PM, the move-in will be processed for the following day.

REPORT SCREENSHOTS

1. Click on Existing Tenant Search under the Verification Reports



2. Enter the Social Security Number and click on Get Report



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

Resident Income Reports

Summary (S)

REPORT USE

The Summary report will be used to provide Identity Verification Status for each household member and there are four verification statuses identified:

1. Verified – personal identifiers (last name, DOB, SSSN) match the SSA database
2. Failed – personal identifiers do not match SSA database
3. Not Verified – personal identifiers have not yet been sent by HUD to SSA for validation or the validation is in process by SSA
4. Deceased – SSA's records indicate the person is deceased

REPORT PROCEDURE

1. For new admissions, this report will be printed within 90 days of the date of the date of Move-In or Initial Certification was transmitted to TRACS. Any necessary action, as described below will be taken.
 - If the report is not available, the property will continue to check availability each month until the report is retrieved.
 - If for any reason the 90-day timeframe has passed, the property will print the report to document that it was retrieved.
2. The report will be visually checked when other income reports are printed and if the report on file shows all household members as Verified, and there have been no changes in the household composition or Identity Verification Status, no new report is required to be filed.
3. When any household member shows a status of Failed or Deceased:
 - The tenant's identifiers will be checked, and
 - Invalid data will be fixed by submitting a Correction or Interim Certification with the correct information.
 - When the Identify Verification Status changes, a new Summary will be printed to replace the obsolete Summary.
4. Household member who are exempt from having SSNs will have the reason for the exemption, along with any appropriate documentation, noted in the tenant file.
 - If there have been such changes, an updated report will be printed to replace the obsolete Summary report in the tenant file and appropriate action will be taken to correct Failed or Deceased identity statuses.



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

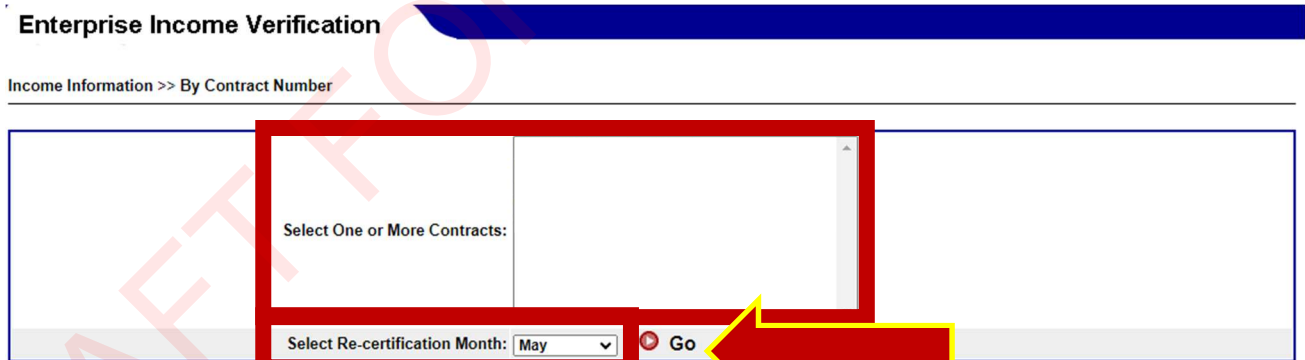
- The following persons are exempt from SSN disclosure and verification requirements:
 - Residents who were 62 years of age or older as of January 31, 2010, and whose initial determination of eligibility was before January 31, 2010.
 - The exception status for these individuals is retained even if there is a break in his or her participation in a HUD assisted program.
 - When determining the eligibility of an individual who meets the except requirements for SSN disclosure and verification, documentation must be obtained that verifies the applicant's exemption status and retained in the tenant file. (Tenant Certifications are not acceptable forms of verification of the exemption status)
 - Individuals who do not content eligible immigration status.
 - For Section 202 PRAC properties, the restriction on providing assistance to noncitizens does not apply. At these properties, individuals who do not content eligible immigration status must sign a certification to that effect. The certification will support the individual not being subject to the requirement to disclose or provide verification of a SSN. The certification must be retained in the tenant file.

REPORT SCREENSHOTS

1. Click on either "By Contract Number" or "By Project Number" under Income Information



2. Select your property's contract or project number and the Recertification Month



3. Click on Go and you will have the Monthly Report Summary

Monthly Report Summary		
Contract(s)		
Re-certification Month	May	
Report Type	Number of Households	Number of Members
Income Report	1	1
Income Discrepancy Report	1	
No Income Reported on 50059	0	0
No Income Reported by HHS or SSA	0	0
New Hires Report	0	0

Income (I)

REPORT USE

The Income report will be used to verify certain income/employment information and is the Level 6, the highest rank and preferred third-party verification method. Income reports will be generated by property staff monthly to ensure that approximately 90 days after the transmission to TRACS of the Move-In or Initial Certification (placing the resident on a new subsidy program) to confirm/validate the income reported by the household. If Income reports are not available, staff will retain proof of running the report in the resident file and continue running the report monthly until the Income report is available.

REPORT PROCEDURE

1. Social Security Benefits

- **General Info** – EIV retains the last eight actions processed by SSA for a resident and includes SSA, SSI, Dual Entitlement, Medicare Part B Premium, and Disability Onset.
- **EIV as 3rd Party** – If the Social Security benefit information in EIV agrees with the amount that the resident reports, knowing we must use the highest level of verification, the EIV printout, a Level 6/highest, will be used, printed, maintained in the resident file, and no additional verification is required.
- **Medicare Part B Deduction** – The Medicare Part B premium will be used as part of the medical expense deduction only when an “N” is indicated in the “Buy-in” column. When the Medicare premium is being paid by the state or another entity, there will be a “Y” in the “Buy-in” column with a corresponding “Buy-in Date” and will not be used to calculate the medical expense.
- **Cost of Living Adjustment (COLA)** – The SSA cost of living adjustments (COLAs) are announced in October and included in EIV the following January. Effective the day after SSA has announced the COLA, CCH must factor the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations of family income that (1) have not yet been completed and (2) will be effective January 1 or later of the upcoming year.
- **Addressing Unexplained Deductions** – While SSA provides information on Medicare premiums, it does not provide information on additional deductions such as Medicare Part D (prescription drugs) premiums, repayment agreement information or garnishments. If there is an unexplained difference between the gross benefit and the net payment, CCH requires the resident to disclose any deductions they may have from their benefits and, when necessary, obtain a current Award letter to verify the amounts.
 - For example, if the resident is paying their Medicare premium and the difference between the gross and net benefit exceeds the amount of the

Medicare premium, property staff must (1) discuss with the resident, (2) determine the reason for the difference, and (3) obtain additional third-party verification to support any of the deductions that may affect the resident's income or allowable expenses.

- **Alternative/Additional Verification** – If the information in EIV *does not agree* with the amount that the resident reports they receive, when the *resident disputes* the EIV data, or there is *no information* in EIV, property staff must request that the resident obtain a current Award Letter.
 - Residents who need to request a current Award Letter may contact SSA by calling 1-800-772-1213 (TTY 1-800-325-0778) or by requesting it over the internet at <https://www.ssa.gov/>
 - SSA Form 7004 may be used by Property staff to request a resident's Social Security Earnings Statement which provides a record of the resident's SS earnings history, year-by-year, and provides an estimate of benefit payments that the resident and the resident's household may qualify for now or in the future. The resident may have the benefits statement mailed directly to the Property staff to satisfy the independent third-party verification requirement. For more information visit <https://www.ssa.gov/myaccount/>

2. NDNH – Wage Compensation

- **General Info** – EIV contains wage and unemployment benefit data from the National Director of New Hires (NDNH maintained by the Department of Health and Human Services (HHS) and retains employment and income data for two years for active adults who (1) are at least 18 years of age, (2) pass the SSA identity test, and (3) Are not listed as a live-in aide on the HUD-50059.
- **EIV as 3rd Party** – If information provided by the resident matches the employment information on the Income report, this is considered and used as 3rd party electronic verification of employment.
- **EIV Data Timing** – Since the EIV System does not provide “real-time” information, it is important to note the delay between the time income is earned and the time income is reflected in EIV is five (5) months after each quarters end. Therefore, EIV is not to be used to determine the resident's projected income and Property staff must obtain additional, more current, verification documentation from the resident.
- **Procedural Summary** – Employment and employment income verification using data provided by EIV is always done as follows:
 - Resident reports employment and employment income on Certification Questionnaire
 - Property staff checks EIV and finds that employment matches residents' information.
 - Property staff requests last four to six paystubs and project/calculate income.
 - If the resident does not dispute the income, verification is complete

- If the resident disputes the income or is unable to provide the last four to six paystubs, 3rd Party verification must be conducted

3. NDNH – Unemployment Compensation

- **General Info** – Unemployment income is generally reported in EIV after the benefit has stopped, therefore EIV Unemployment Income will not be used to project income for the next 12 months; however, information will be compared to the previous HUD-50059s to monitor resident reporting.
- **Procedural Summary** – Employment and employment income verification using data provided by EIV is always done as follows:
 - Resident reports unemployment compensation on Certification Questionnaire
 - Property staff checks EIV and finds that employment matches residents' information.
 - Property staff requests last unemployment benefit award letter.
 - If the resident does not dispute the income, verification is complete
 - If the resident disputes the income or is unable to provide the last unemployment benefit award letter, 3rd Party verification must be conducted

4. Irregular Income

- **General Info** – Some circumstances present more than the usual challenges to estimating anticipated income, like sporadic, seasonal, or self-employment work. In each instance, CCH is expected to make a reasonable judgment as to the most reliable approach to estimating what the tenant will receive during the year and mid-year or interim reexaminations may be required to reflect changing circumstances.
- **EIV as 3rd Party** – the EIV Income report will be used as a tool to identify past income and verify past employment, which may be used as electronic 3rd party verification, if the resident agrees with the information provided.
- **Procedural Summary** – Irregular income using data by EIV is always done as follows:
 - Resident reports income on Certification Questionnaire
 - Property staff checks EIV and finds that irregular income matches residents' information and the resident does not dispute, verification is complete.
 - If complete information is unavailable or the resident claims that the information does not accurately reflect future income, the resident will be asked to produce alternative verification documents such as tax returns, bank statements, or other acceptable documents and a notarized statement which details the anticipated income for the coming 12 months.



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

REPORT SCREENSHOTS

1. After running the Income Information by Contract Number or Project Number (see screenshots for Summary report), click on the underlined Income Report.

Monthly Report Summary		
Contract(s)		
Re-certification Month	All	
Report Type	Number of Households	Number of Members
<u>Income Report</u>	362	497
<u>Income Discrepancy Report</u>	35	
No Income Reported on 50059	0	0
No Income Reported by HHS or SSA	0	0
<u>New Hires Report</u>	1	1

2. You will be taken to a different screen that will show you two tabs: (1) Summary Reports of the individuals and (2) Detailed Reports for each individual

- a. You can download the Summary Report Tab in Excel

Income Information >> By Contract Number >> Report Summary >> Income Report Summary

Income Report Summary	
Contracts :	
Re-certification Month:	All
Households With Income:	362

Next Group 1 - 50 of 362 Households [Last Page](#)

[Download in Excel](#)

Summary Reports | Detail Reports

HOH DOB	Contract Number	Project Number	Unit Address
Wage and Benefit Report for Household of EDUARD BUKHMAN			

Income Information >> By Contract Number >> Report Summary >> Income Detail Report

Income Report Detail	
Contracts:	
Re-certification Month:	All
Households With Income:	362

Next Group 1 - 50 of 362 Households [Last Page](#)

[Printer-Friendly Version](#)

- i. You will have to separate for each household; OR



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

- ii. On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of their Summary, Income, and Income Discrepancy Report and Certification Page tabs for printing to PDF.

Summary Report				Income Report		Income Discrepancy Report		Certification Page		<input type="button" value="Print"/>
Confirmation of Third Party Verification										
Contract Number				Subsidy Type				Section 8		
Project:				Project Number						
Next Re-certification Date				05/01/2025		Form 50059 as of:		04/19/2024		
Address:										
Most Recent Type of Action:				AR-Annual Recertification		Effective Date:		05/01/2024		
Head of Household:										
Social Security Number:						Date of Birth:				
Household Member Name			Household Member SSN			Date of Birth		Relationship		
								Head of Household		
								Spouse		

Income Discrepancy (ID)

REPORT USE

Income Discrepancy reports must be printed at the same time as the Income report and Property staff must review and resolve any discrepancies at the time of printing. Reviewing Income Discrepancy reports on an annual basis provides property staff with information necessary to monitor and, if necessary, re-calculate rent and assistance. The report helps monitor compliance by providing information about residents who may have failed to report changes and/or sources of income such as Social Security benefits, past or current employment and employment income, or unemployment benefits.

Income Discrepancies are generated when household have wages, unemployment, or social security benefits income reported in EIV which is \$2400 or more than the wages, unemployment or social security benefit income reported and transmitted through TRACS.

REPORT PROCEDURE

1. **General Procedures** – Between 120 and 60 days prior to Annual Recertifications, 90 days after the transmission to TRACS of the Move-In or Initial Certification, and at time of processing Interim Recertifications, Property staff will print any Income Discrepancy Reports available in EIV.
 - When the Income Discrepancy report is generated, property staff must immediately print out each report as new reports are generated weekly and overwrite with new data.
 - Property staff must compare the SS, SSI, wage, and unemployment compensation information reported on the previous HUD-50059 and, if applicable third-party verifications, with the employment and income information reported in EIV to determine whether or not there is a valid discrepancy.
 - Property staff should ensure that the current certification reported on the Income Discrepancy report is in fact the current HUD-50059 in the user's compliance software.
 - Property staff will not suspend, terminate, reduce, or make a final denial of any financial assistance or payment under a federal benefit program against an individual, or take other adverse action against such individual, as a result of information produced by the EIV system without meeting with the resident and properly verifying the information and notifying the resident in writing of any adverse findings in the same manner as applies to other information findings related to eligibility factors.
 - Property staff will obtain independent verification of disputed EIV data such as that provided by SSA and HHS' NDNH, in accordance with Procedures for termination, denial, suspension, or reduction of assistance based on information obtained from a SWICA or Federal Agency (24 CFR 5.236).

- If a resident fails to report, as required, they must be provided a notice.
 - Property staff must log comments on the resolution on the Certification Income report which is used to record responses to unresolved EIV discrepancies throughout the year.
 - Since all EIV errors are not the result of errors in TRACS or resident non-compliance, it is necessary to maintain a record of response to errors in one place and be maintained by calendar year.
2. **Effective Dates** – In accordance with HUD policy and CCH Resident Selection Criteria,
- If the resident complies with the interim reporting requirements by reporting changes in a timely manner:
 - Increases in rent will be effective the first of the month following a 30-day notice of rent increase.
 - Decreases in rent will be effective the first of the month following the date of action that caused the decrease.
 - If the resident does not comply with the interim reporting requirements by not reporting changes in a timely manner:
 - Increases will be effective the first of the month following the date of action that caused the increase; a 30-day notice will not be provided or required.
 - Decreases will be effective the first of the month following the completion of the interim reexamination; adjustments may not be retroactive.
 - If it is discovered that residents have not disclosed all of their income information and non-disclosure goes back for a number of years, Property staff will limit investigation of unreported income to income received by the resident within the last five (5) years (assuming they have received assistance at the property for those five (5) years).
3. **Investigating Discrepancies** – Property staff will review income discrepancies and compare the information in EIV with information included in the resident file and because the EIV information is historical and resident calculations are generally “projected” the file may already include documentation that explains the discrepancy.
4. **Addressing Data Entry Errors** – Property staff will review the resident file to determine if a simple data entry error caused the discrepancy and if a data entry error is discovered, the corresponding 50059 must be corrected within 30 days and the new corrected signed 50059 must be transmitted to HUD and/or the Contract Administrator.
- If the correction generates a rent increase/assistance decrease, Property staff will correct the certification and any subsequent certifications using the original certification effective date, provide a 30-day notice of rent increase to the household to be effective the first of the month following the 30-day notice.
 - If the correction generates a rent decrease/assistance increase, Property staff will correct the certification and any subsequent certifications using the original

certification effective date, notify the resident of the rent change, and make that change retroactive to the effective date of the certification.

- The rent credit will be returned to the resident and they can choose if they want the entire rent credit in one lump sum or if the recredit should be applied to future rent.

5. Addressing Valid Income Discrepancies

- If review of the Income Discrepancy report and review of the supporting Income report indicate that the resident has failed to disclose an income decrease, property staff must notify the resident.
- If review of the Income Discrepancy report and review of the supporting Income report indicate that the resident has failed to disclose new income or increases in income, Property staff must notify the resident who will have 10 calendar days to participate in a meeting with Property staff to discuss the discrepancy.
 - Failure to respond to the notice will result in termination of assistance and/or resident the first of the month following the 10-day notice.
 - During the meeting, the resident will be asked if the information in EIV is accurate and
 - If the information is accurate, the resident must sign appropriate documentation that determines assistance was paid in error.
 - Based on the information verified, an Interim Recertification will be created and the resident will be required to return any “assistance paid in error” to HUD by either (1) one lump sum, (2) executed repayment agreement, or (3) combination of lump sum and executed repayment agreement.
 - The monthly repayment amount plus the amount of the tenant’s total payment (TTP) must not exceed 40 percent of the family’s monthly adjusted income at time of execution and may only exceed 40 percent if the family agrees to the higher amount in the executed agreement.
 - If the resident refuses to sign documents or attempts to refuse to return “assistance paid in error,” Property staff will take appropriate action up to and including termination of assistance and/or tenancy and pursuing fraud.
- **Procedural Summary** – The following procedure should be followed to resolve valid income discrepancies:
 - Notify and discuss any discrepancy with the resident
 - Request current document from the resident
 - Perform verification for any income source that the resident disputes

- Confirm effective date of unreported income
- Provide the resident the right to contest findings
- Create an Interim Recertification to adjust the rent
 - Return overpayment of rent to the resident or
 - Determine the amount of “assistance paid in error” to be returned to HUD
- If necessary, execute a repayment agreement when the resident is unable to pay the amount due in full
- Reimburse to HUD any “assistance paid in error”

6. **Invalid Data in EIV**

- If the resident claims that the information provided in EIV is invalid, Property staff will send verifications to the employer listed in EIV to confirm the information provided by the resident.
 - There could be several valid reasons for errors that would preclude any action like (1) Human error, (2) System Error (SSA/SSI/EIV/HHS), or (3) Identity Theft

7. **EIV Income Not Belonging to Tenant** – There may be times when the source or originator of EIV information makes an error when submitting or reporting information about tenants and it is important to know that HUD cannot correct data in the EIV system, only the originator of the data can correct the information. When data is corrected by the source or the originator, HUD will obtain the updated information with its next computer matching process. Below are the procedures to follow regarding incorrect EIV information:

- **TRACS** data reported in EIV originates from the property and once data is corrected in the property's compliance software, the corrected data must be transmitted to TRACS.
- **Employment and wage information** reported in EIV originates from the employer who reports this information to the local State Workforce Agency (SWA), who in turn, reports the information to HHS' NDNH database.
 - If the tenant disputes the accuracy of the information in EIV that was provided by the employer and after third-party verification is obtained by CCH, it is determined that the information is not accurate, the tenant should contact the employer directly, in writing, to dispute the employment and/or wage information and request that the employer correct erroneous information. The tenant should provide CCH with a copy of this written correspondence to maintain in the tenant file.
- **Unemployment benefit information reported in EIV originates from the local SWA.**
 - If the tenant disputes the accuracy of the information in EIV that was provided by SWA and after third-party verification is obtained by CCH, it is determined that the information is not accurate, the tenant should contact the SWA directly, in

writing, to dispute the unemployment benefit information, and request that SWA correct erroneous information. The tenant should provide CCH with a copy of this written correspondence to maintain in the tenant file.

- **SS and SSI benefit information** reported in EIV originates from the SSA.
 - If the tenant disputes the accuracy of the information provided in EIV that was provided by SSA and after third-party verification is obtained by CCH, it is determined that the information is not accurate, the tenant should contact the SSA at (800) 772-1213 or visit the local SSA office and request that the erroneous information be corrected. SSA office information is available in the government pages of the local directories or online at <https://www.ssa.gov/>
- **Identity Theft** may be signaled by incorrect information in EIV. Sometimes someone else may use an individual's SSN, either on purpose or by accident. The SSA does not require an individual to report a lost or stolen SSN card and reporting will not prevent the misuse of an individual's SSN. A person using an individual's SSN can get other personal information about that individual and apply for credit in that individual's name.
 - If the tenant suspects someone is using their SSN, they should:
 - Check their Social Security records to ensure their records are correct by calling SSA at 1-800-772-1213
 - File an identity theft complaint with the Federal Trade Commission by calling FTC at 1-877-438-4338 or visiting their website at <https://consumer.ftc.gov/features/identity-theft>
 - Monitor their credit reports and/or request their credit report and place a fraud alert with the three national credit reporting agencies (Equifax, TransUnion, and Experian).
 - Equifax Credit Information Services, Inc
PO BOX 740241 www.equifax.com
Atlanta, GA 30374 (800) 685 – 1111
 - Experian
PO BOX 2104 www.experian.com
Allen, TX 75013 (888) 397-3742
 - TransUnion
PO BOX 6790 www.transunion.com
Fullerton, CA 92834 (800) 680-7289 or (800) 888-4213



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

REPORT SCREENSHOTS

1. After running the Income Information by Contract Number or Project Number (see screenshots for Summary report), click on the underlined Income Discrepancy Report.

Monthly Report Summary		
Contract(s)		
Re-certification Month	All	
Report Type	Number of Households	Number of Members
<u>Income Discrepancy Report</u>	362	497
No Income Reported by HHS or SSA	0	0
<u>New Hires Report</u>	1	1

2. You will be taken to a different screen that will show you two tabs: (1) Summary Reports of the individuals and (2) Detailed Reports for each individual
 - a. On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of their Income Discrepancy Report for printing to PDF.

Print

Summary Report	Income Report	Income Discrepancy Report	Certification Page
Head of Household Information			
Name:			
Social Security Number:			
Contract Number			
Project Number			
Project:			
Effective Date of Action: 01/01/2024			
Next Re-certification Date: 01/01/2025			
Projected Annual Wages and Benefits from Form HUD-50059: \$105,869.00 Note			
Period Of Income for Discrepancy Analysis: 10/01/2022 - 09/30/2023			
Discrepancy Analysis		Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:		\$123,866.60	\$130,382.70
Amount of Annual Income Discrepancy:		(\$17,997.60)	(\$24,513.70)
Amount of Monthly Income Discrepancy:		(\$1,499.80)	(\$2,042.81)
Percentage of Income Discrepancy:		(14.53%)	(18.8%)
<small>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.</small>			
<small>Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.</small>			
<small>Report Generated By - MDPXXX BRANDON M FLANNERY</small>			

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

CCH will repay any funds collected from the tenant to HUD and has the option of collecting the lesser of actual cost or twenty (20) percent of the amount received from the tenant and depositing this amount in the operating account for the property to offset the expenses incurred.

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

Resident Other Reports

New Hires (NH)

REPORT USE

The New Hires report provides employment information for residents who may have started new jobs and the information in this report is updated on a monthly basis. Since most employers' report information on new hires to their state within thirty (30) days of the hire date, the information should appear on this report within 90 days of when a resident has started a new job. To ensure timely rent adjustments, the New Hires report must be run on a monthly basis with the Recertification Month selected as "All." Property staff must run this report each month when printing Income reports.

REPORT PROCEDURE

1. CCH will not deny, suspend, or reduce any benefits of a resident until HUD, or the owner has taken appropriate steps to independently verification information relating to: (1) the amount of wages, other earnings or income, or unemployment compensation involved; (2) whether such resident actually has (or had) access to wages, other earnings or income, or benefits for their own use; and (3) the period (or periods) when, or with respect to which, the resident actually received such wages, other earnings or income, or benefits.
2. When a resident appears on the New Hires Report, the following procedure will be followed:
 - Property staff must contact the resident regarding their new employment.
 - Confirm with the resident that they have a new job and that the employment information in the EIV system is correct.
 - If the resident agrees that the employment information in the EIV systems is correct:
 - request the resident provide documents (for example, four current, consecutive pay stubs, employment confirmation letter specifying rate of pay, number of hours worked each week, pay frequency, etc.) for use in determining the resident's income and, if necessary request third party verification from the employer.
 - Process a recertification (if applicable) in accordance with program requirements that includes the employment income.
 - Determine the amount the resident will be required to return to HUD for any assistance paid in error by (1) one lump sum, (2) execute repayment agreement, or (3) a combination of both lump sum and repayment agreement.

- Monthly repayment plus the amount of the tenant's Total Tenant Payment (TTP) at the time the repayment agreement is executed should not exceed 40% of the family's monthly adjusted income.
- If the resident refused to execute a repayment agreement, revokes forms HUD-9887 and HUD-9887-A, or refuses to return assistance paid in error, property staff will take appropriate action up to and including notify of material lease violation (based on CCH's policy and procedure regarding material lease violations), termination of assistance, tenancy, and pursuing fraud.
- If the resident claims that the information is invalid:
 - Property staff will contact the employer listed in the EIV to verify the information as there can be several valid causes for errors that would preclude any action like Human Error, System Error, or Identify Theft.
 - There may be cases where attempts to verify the EIV data is unsuccessful and, in these cases, the resident must certify that the employer and employment information displayed in EIV is invalid and has been wrongly attributed to his or her personal identifiers.
 - Residents will be advised to contact the third-party income sources, and if unsuccessful, contact the State Workforce Agency (SWA) to have that employer or agency remove the invalid income information from their records while CCH uses tenant provided documentation to verify tenant income.



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

REPORT SCREENSHOTS

1. After running the Income Information by Contract Number or Project Number (see screenshots for Summary report), click on the underlined New Hires Report.

Monthly Report Summary		
Contract(s)		
Re-certification Month	All	
Report Type	Number of Households	Number of Members
<u>Income Report</u>	362	497
<u>Income Discrepancy Report</u>	35	
No Income Reported on 50059	0	0
by HHS or SSA	0	0
New Hires Report	1	1

2. You will be taken to a different screen that will show you two tabs: (1) Summary Reports of the individuals and (2) Detailed Reports for each individual

Income Information >> By Contract Number >> Report Summary >> New Hires Report Summary

New Hires Report Summary	
Contracts :	
Re-certification Month:	All
Period Reviewed:	11/25/2023 - 05/25/2024
Households with New Hires:	1
Members With New Hires:	1

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1 - 1 of 1 Households

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Summary Reports	Detail Reports							
****	****							
Full Last Name	Full First Name	HOH DOB	Member First Name	Member Last Name	Property Id	Contract Number	Project Number	Unit Address

- a. On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of their Income Discrepancy Report for printing to PDF.
- b. You can download the Summary Report Tab in Excel
- c. You can print to PDF the Detail Reports tab
 - i. You will have to separate for each household; OR
 - ii. On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of the New Hire Report for printing to PDF.

[Print](#)

New Hire Report			
Wage and Benefit Report for Household of FOR			
Contract Number	Subsidy Type	Section 8	
Project:	Project Number		
Property Id	Property:		
Next Re-certification Date	05/01/2025	Form 50059 as of:	04/19/2024
Address:			
Most Recent Type of Action:	AR-Annual Recertification	Effective Date:	05/01/2024
Head of Household:			
Social Security Number:	Date of Birth:		
Print Member Information			
Household Member:	SSN:		
Date of Birth:	Relationship:	Head of Household	

Multiple Subsidy (MS)

REPORT USE

The Multiple Subsidy report will be reviewed on a monthly basis with the Recertification Month selected as "All." And must be run for both MF and PIH. If any household member received or attempted to receive assistance in another HUD assisted unit while receiving assistance on a CCH property, the household member will be required to reimburse HUD for assistance paid in error and is considered a material lease violation and may result in penalties up to and including eviction and pursuit of fraud charges.

REPORT PROCEDURE

1. There are situations where a dual assistance is allowed as a minor may reside in two different HUD assisted units if two parents/guardians live in separate units and share 50% custody of the minor.
2. When households split, meaning one household member remains in a unit and other household members move to a new unit, there may be a required notification period that prevents staff from removing a resident until the notice has been executed.
3. In addition, a resident receiving a housing assistance that does not include subsidy, such as a 236 property, may also benefit from HUD's Housing Choice Voucher Program.
4. If a resident appears on the Multiple Subsidy Report and the resident appears to be violating HUD's rules regarding dual subsidy or multiple residences, the household will be sent an appropriate notice and be required to meet with property staff or face termination and/or eviction as appropriate.
 - During the meeting, the resident will be asked if the information in EIV is accurate.
 - If the resident claims the information is invalid, then the resident's signed forms HUD-9887 and HUD-9887-A allow property staff to contact the other landlord to verify, or if necessary, determine the extent of the violation.
 - If the resident revokes forms HUD-9887 and HUD-9887-A, property staff will take appropriate action up to an including termination of assistance, tenancy, pursuit of fraud, and notice of material lease violation. Action will be taken based on CCH's policy and procedures regarding material lease violations.
 - Property staff in conjunction with the Portfolio Manager will determine appropriate action including termination of assistance, termination of tenancy, requirement to return assistance paid in error to HUD and pursuit of fraud after verification is complete.



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

- There can be several valid causes for errors that would preclude any action, like Human Error, System Error, or Identify Theft.
- There may be cases where attempts to verify the EIV data is unsuccessful which will require the resident to certify that the resident information displayed in EIV is invalid and has been wrongly attributed to their personal identifiers.

DRAFT FOR COMMENT

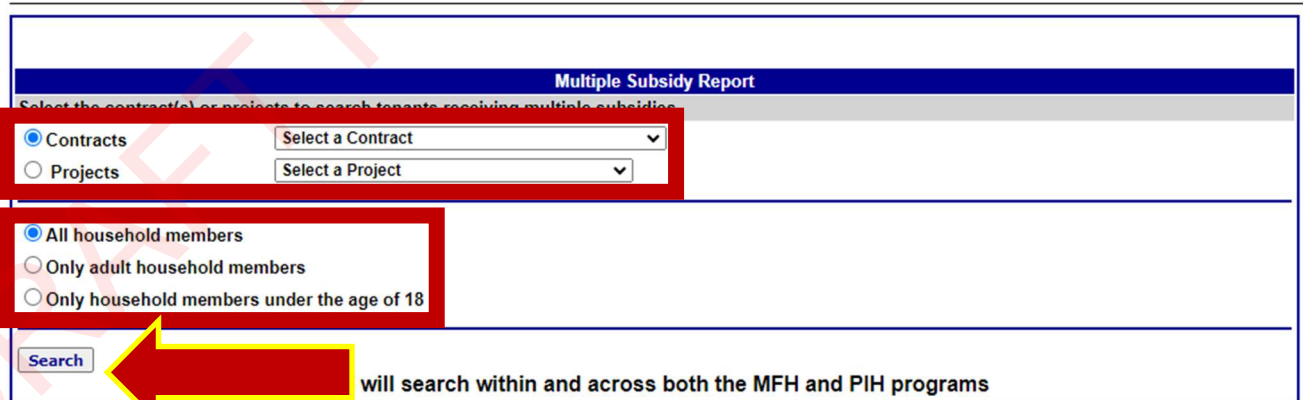
REPORT SCREENSHOTS

1. Click on Multiple Subsidy Report under the Verification Reports



2. Select the Contract or Project from the drop-down and if you want (1) All household members, (2) Only adult household members, or (3) Only household members under the age of 18, then click Search

Verification Reports >> Multiple Subsidy Report >> Report Selection



3. You will get a Multiple Subsidy Report Summary if no data

CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

- If there are found data, you will be taken to a different screen that will show you two tabs: (1) Summary Reports of the individuals and (2) Detailed Reports for each individual

Verification Reports >> Multiple Subsidy Report >> Report Selection >> Multiple Subsidy Report Summary

Multiple Subsidy Report Summary	
Contract Number:	
Members Receiving Multiple Subsidies:	1
Search Criteria:	Within PIH and MF Programs
Search Criteria:	All household members

[Printer-Friendly Version](#)
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1 - 1 of 1 Members

Summary Reports	Detail Reports
***_**	2

- On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of their Income Discrepancy Report for printing to PDF.
 - You can download the Summary Report Tab in Excel
 - You can print to PDF the Detail Reports tab
 - You will have to separate for each household; OR



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

- ii. On the Summary Report Tab, you can click on the underlined SSN to get the individual's pop-up window of the PIH/MF Tenant Match Results for printing to PDF.



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

PIH Tenant Match Results : 1 match found.

SSN:	
HOH SSN:	
HOH First Name	
HOH Last Name	
Program Type	
50058 Type Of Action	
50058 Effective Date	
PHA	
PHA Address	
PHA Telephone Numbers	

ALERT! This individual may be currently assisted.

Follow-up with respective PHA/Owner/Agent to confirm individual's program participation status before admission into program.

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

Report Generated By - MDPXXX BRANDON M FLANNERY

MF Tenant Match Results : 1 match found.

SSN:	
HOH SSN:	
HOH First Name	
HOH Last Name	
Property ID	
Contract Number	
Project Number	
Subsidy Type	Section 8
Owner/Management Agent name	
Owner/Management Agent Telephone	
50059 Type Of Action	Annual Recertification
50059 Effective Date	03/01/2024

Identity Verification (IV)

REPORT USE

There are two reports that can be accessed from the Identity Verification report, must be reviewed on a monthly basis with the Recertification Month selected as "All," and discrepancies addressed as quickly as possible to ensure that EIV Income matches are completed.

Failed Pre-Screening

The Failed Pre-Screening report indicates that SSA information provided on form HUD-50059 failed the pre-screening test due to invalid or missing personal identifiers (last name, date of birth, or social security number). The tenants identified in this report will not be sent to SSA for SSA identity test until the personal identifier information is corrected in TRACS. Common errors include empty fields or fields requiring letters or numbers filled with other characters.

Failed Verification

The Failed Verification report identifies household members who failed the SSA identity test because their personal identifiers (last name, date of birth, social security number) do not match SSA's records. Usually, Failed Verification reports are returned when there are data entry errors, such as transposed numbers; however, other factors can create errors.

REPORT PROCEDURE

1. Property staff will review the resident file to determine if a simple data entry error caused this discrepancy.
 - If the discrepancy is determined to be a data entry error, the corresponding 50059 must be corrected within 30 days.
 - The corrected certification must be signed by all adult household members and the new corrected, signed 50059 must be transmitted to the Contract Administrator and/or HUD.
2. If the reason for the discrepancy cannot be identified after a simple file review, property staff will contact the affected resident and notify them that their social security number, date of birth, and/or last name is producing discrepancies.
 - The resident will have 10 business days to respond to the notice and failure to respond will result in termination of assistance and/or tenancy as appropriate.
 - During the meeting, property staff will discuss the discrepancy with the resident and in some cases, additional verification of the information may be necessary.
 - IF the resident claims that the information provided by EIV is inaccurate, the resident must sign appropriate verification release forms and assist property staff in efforts to obtain verification of the information provided.

- Property staff will encourage the resident to contact the Social Security Administration to correct any inaccurate data in their databases.
 - The resident can request SSA to correct their record by completing and submitting form SS-5, Application for a Social Security Card, to the local office.
- 3. If the information provided by the resident was inaccurate and it is determined to be a fraudulent action, the resident will receive a notice of “material lease violation” and the property staff will begin the process to terminate assistance and/or tenancy as appropriate.
 - Unintentional errors that do not cause preferential treatment will not be used as a basis to terminate assistance and/or tenancy.
- 4. Effective January 31, 2010, providing a valid social security number for all household members is required and if it is determined that the social security number provided was incorrect, HUD requires that we attempt to recover subsidy paid in error.
 - In these cases, property staff will:
 - Create/correct appropriate certifications; and
 - Request all “assistance paid in error” is returned to HUD in one lump sum, or
 - Require that all “assistance paid in error” is returned to HUD as scheduled in an executed repayment agreement
 - If a resident refuses to sign the verification documents or attempts to refuse to return assistance paid in error, CCH will take appropriate action up to and including termination of assistance and/or tenancy and pursuit of fraud.

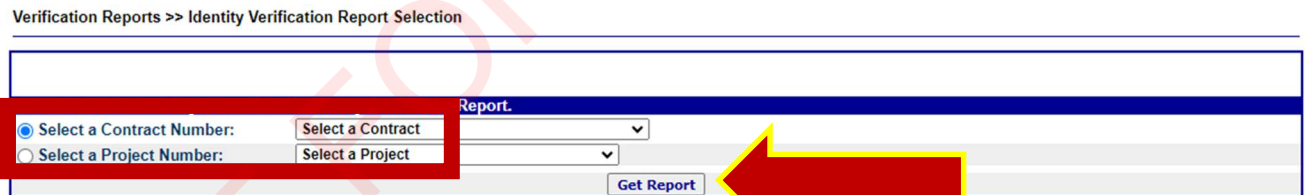
REPORT SCREENSHOTS

1. Click on Existing Tenant Search under the Verification Reports



2. Select the Contract or Project from the drop-down then click Get Report

Verification Reports >> Identity Verification Report Selection



3. You will be taken to a screen that will show (1) Number of households Not-Verified (verification in process), (2) Failed EIV Pre-Screening, and (3) Failed Verification Report (failed the SSA Identity Test).

Verification Reports >> Identity Verification Report Selection >> Identity Verification Reports

Identity Verification Reports as of MAY 25, 2024	
Contract Number	
Re-Certification Month	All

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• Number of households Not-Verified (verification in process)	1
• Failed EIV Pre-screening	0
• Failed Verification Report (Failed the SSA Identity Test)	0



POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



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4. You can click on any of the underlined items to be taken to details for printing to PDF

Verification Reports >> [Identity Verification Report Selection](#) >> [Identity Verification Report](#) >> Pending Verification Report

Pending Verification Report by Contract as of MAY 25, 2024	
Contract	
Re-certification Month	All
Households pending verification	1

[Printer Friendly Version](#)

1 - 1 of 1 Households

Pending Verification Report for Contract				
HOH SSN:	HOH Name:	Project Number: -	Property ID:	Effective Date: 04/02/2024
Member SSN	Member Name			Member DOB

1 - 1 of 1 Households

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.
 Report Generated By - MDPXXX BRANDON M FLANNERY

Deceased Tenants (DT)

REPORT USE

The Deceased Tenants report identifies residents who are currently reflected in TRACS as existing/active residents and who have been identified by SSA as deceased and property staff will run this report monthly with the Recertification Month selected as "All." If a resident is listed on the Deceased Tenants report, Property staff will contact the head of household, next of kin, or emergency contact person, in writing, to confirm whether or not the resident is deceased; and if so, create an Interim Recertification to update the household composition and recalculate assistance.

REPORT PROCEDURE

The DT report will be printed monthly with the Recertification Month selected as "all."

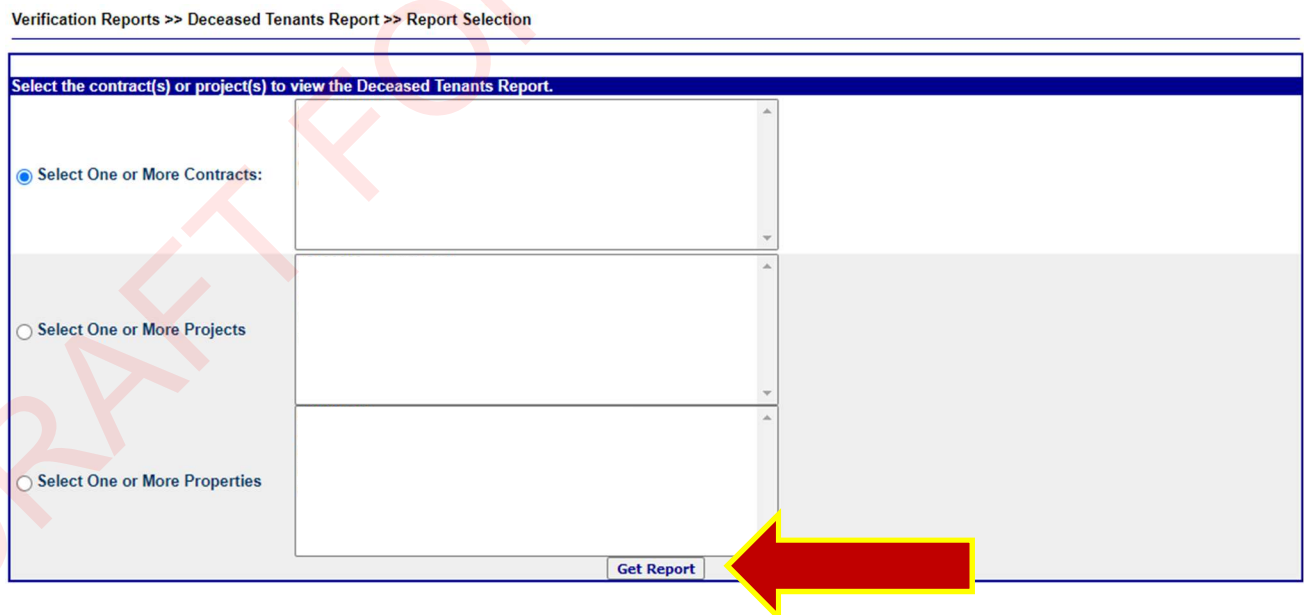
1. In cases where deceased status was unknown and proper move-outs or recertifications have not already been transmitted to TRACS, written confirmation as to whether the person is deceased or not will be obtained from the individual, head of household, next-of-kin, or if none of these persons exist, another appropriate contact.
2. If the tenant is not deceased, they will be advised to contact the Social Security Administration to correct the error/get the discrepancy resolved. In some cases, the property staff may opt to waive minimum rent if financial assistance is temporarily terminated.
3. If the deceased tenant was already removed from subsidy via a Move-Out or Interim Reexamination, the report will be documented. Management will visually check the Tenant Certification Query to see whether the Move-Out or Interim Reexamination is in the TRACS database.
 - If so, no further action will be taken.
 - If not, management will retransmit and recheck the Query to ensure that the action/certification appears in the TRACS database.
4. If appropriate removal from subsidy has not yet occurred, a Move-Out or Interim, effective on the appropriate retroactive date, will be transmitted within 30 days of the Report date and overpaid subsidy will be returned to HUD. CCH staff will ensure processes are in accordance with HUD Handbook and MAT Guide.

REPORT SCREENSHOTS

1. Click on Existing Tenant Search under the Verification Reports



2. Select the Contract, Project, or Property from the selections then click Get Report





POLICIES AND PROCEDURES
HUD EIV USE AND SECURITY



CCH USE AND SECURITY OF HUD'S ENTERPRISE INCOME VERIFICATION SYSTEM

3. You will be taken to a report that can be printed to PDF

Verification Reports >> Report Selection >> Deceased Tenants Report

Deceased Tenants Report by Contract for Reexamination Month - All															
Contract(s)															
Total number of households evaluated	Total number of household members evaluated	Households with deceased members	% of households with deceased members	# of single member deceased households	% of single member deceased households	Deceased Members	Members deceased less than 90 days ago		Members deceased less than 1 year and more than 90 days ago		Members deceased more than 1 year		Members deceased with no deceased date		
							#	%	#	%	#	%	#	%	
186	253	0	00.00%	0	00.00%	0	0	00.00%	0	00.00%	0	0	00.00%	0	00.00%

Printer Friendly Version

DRAFT FOR COMMENT



Reports Not Ran by CCH Management

Per HUD Handbook, CCH is not required to retain copies of this report and CCH's population mostly consists of elderly household, CCH policy is to not run these reports.

No Income Reported by HHS or SSA Report

The No Income Reported by HHS or SSA report lists resident who passed the identity match against the SSA database, but no employment or benefit information was received through the match with SSA and HHS; however, does not mean that the resident does not have income. It is possible that the resident is receiving income through a source which isn't reported in EIV.

No Income Reported on the 50059

The No Income Reported on the 50059 identifies those residents who have report zero income on the most recent 50059; however, HUD no longer require that residents who report nominal income of less than \$100 a month complete the Income Questionnaire on a quarterly basis; however, CCH requires that resident complete a Zero Income Questionnaire or Certification to coincide with their reexamination(s).



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

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POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT A

Acknowledgement of Security and Privacy Policies

DRAFT FOR COMMENTS



Employee Name: _____
Property Name: _____

WASS ID: _____
Date: _____

ACKNOWLEDGEMENT

1 By signing this form, I acknowledge that I have read and understand CCH Use and Security Policies and Procedures and received actual copies or links to information of the following (if checked):

- 2 Checklist:
- CCH EIV Use and Security Policies and Procedures
 - EIV Websites and Guidance
 - EIV Website for MF Housing
 - EIV Training Outreach
 - RHII Website
 - HUD Handbook 4350.3
 - Rent and Income Quality Control Guide
 - EIV User Access Authorization Form
 - EIV and You Brochure
 - HUD Secure Systems Access Guide
 - EIV Security Binder, Checklist, & Configuration
 - EIV Rules of Behavior
 - EIV Security Awareness Training

3 Signatures:

_____	_____	_____
User/Staff (Print Name)	Signature	Date
_____	_____	_____
Supervisor (Print Name)	Signature	Date
_____	_____	_____
EIV Coordinator (Print Name)	Signature	Date
_____	_____	_____
WASS Coordinator (Print Name)	Signature	Date



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT B

Privacy Policy for Auditors

DRAFT FOR COMMENTS



Full Name: _____
Employer: _____

Date: _____
Phone: _____

EIV PRIVACY POLICY FOR AUDITORS/NON-EIV USERS

A You are required to review and acknowledge the information in this document because you are being provided with access to an area that contains confidential resident information. Unauthorized access or disclosure of information is a federal offense punishable by substantial fines and/or incarceration.

B It is the policy of the owner/agent to guard the privacy of applicants and residents conferred by the Federal Privacy Act of 1974 and the Health Insurance Portability & Accountability Act of 1996 (HIPAA) to ensure the protection of such individuals' records maintained by the owner/agent. Therefore, the owner/agent shall not disclose personal information contained in its records to any outside person or agency unless the individual about whom information is requested shall give written consent to such disclosure.

NOTE: This does not include persons responsible for eligibility determination or compliance monitoring such as HUD or HUD's agents. Information is provided to HUD and HUD's agents on a regular basis in order to assure compliance and timely payment of housing assistance payments. In addition, in cases of suspected fraud, information may be provided to the Office of the Inspector General or others as directed by subpoena or court order.

C This Privacy Policy in no way limits the owner/agent's ability to collect such information, as it may need, to determine eligibility, compute rent, or determine an applicant's eligibility or suitability for tenancy. Consistent with the intent of Section 504 of the Rehabilitation Act of 1973, any information obtained regarding a person's disability will be treated in a confidential manner.

D We are dedicated to protecting the privacy of personal information that was used to determine eligibility for rental assistance based on HUD regulations, including Social Security, other governmental identification numbers and any other required information. We have adopted a privacy policy to help ensure that information is kept secure.

EIV PRIVACY POLICY FOR AUDITORS/NON-EIV USERS

E Keeping applicant and resident information confidential is one of our most important responsibilities. We maintain physical, electronic and procedural safeguards to protect information. We are bound by a code of ethics that requires confidential treatment of eligibility information and are subject to disciplinary action if this code is not followed.

Please feel free to contact the CCH management team at any time to discuss our Privacy Policy or anything else that will help ensure our residents continued enjoyment in their home with us.

F **Technical Safeguards:** Only HUD or HUD's agents and authorized staff have access rights to information based on their role in the company. These roles are monitored on a regular basis through inspections and reviews. Authorization procedures for staff and auditors will:

1. Reduce the risk of a security violation related to the EIV system's software, network, or applications
2. Identify and authenticate all users seeking to use the EIV data
3. Deter and detect attempts to access without authorization
4. Monitor the user activity on the EIV system

G **Administrative Safeguards:** Staff is trained based on federal and state laws regarding privacy. Written policies and procedures include but are not limited to making sure that the required HUD forms 9887, 9887A, and consents are updated and in place. File audits completed internally as well as HUD reviews help to ensure compliance with these policies. These administrative procedures will:

1. Ensure that access rights, roles, and responsibilities are appropriately and adequately assigned
2. Protect copies of sensitive data and destroy system-related records to prevent reconstruction of the contents
3. Ensure authorized release of tenant information consent form is included in all family files, before accessing and using data
4. Maintain, communicate, & enforce policies to securing EIV data
5. Train staff on security measures and awareness, preventing the unauthorized accessibility and use of data

EIV PRIVACY POLICY FOR AUDITORS/NON-EIV USERS

H Physical Safeguards:

The owner/agent will document all persons who have access to resident data or who have permission to enter areas where resident data is stored. Such persons are required to review and acknowledge the Privacy Act Requirements and must agree to comply with these requirements. Staff is required to notify Coordinators/Security Administrators of system breaches and penetration by unauthorized users. There are written policies which include all personal information to be kept in a locked file cabinet, certain printer/fax/electronic equipment designated to receive confidential information and system security to prevent security breaches. These physical safeguards will:

1. Establish barriers between unauthorized persons and documents or computer media containing private data.
2. Clearly identify restricted areas by prominent signs/other indicators.
3. Develop a list of authorized users who can access restricted areas-e.g., contractors, maintenance, and janitorial/cleaning staff.
4. Prevent undetected entry into protected areas and/or documents with posted signage that reads "authorized personnel only".

I Disposal of Information:

In accordance with the FTC "Disposal of Consumer Report Information and Record", any applicant or resident files that are destroyed based on the Records and Retention Policy will be disposed properly. A "proper" disposal of this information is one that is reasonable and appropriate to prevent any unauthorized access to personal information such as the items listed above. Approved disposal methods include:

- Burn, pulverize, or shred papers containing consumer report information so that the information cannot be read or reconstructed;
- Destroy or erase electronic files or media containing consumer report information so that the information cannot be read or reconstructed;
- Conduct due diligence and hire a document destruction contractor to dispose of material specifically identified as consumer report information consistent with the Rule.



EIV PRIVACY POLICY FOR AUDITORS/NON-EIV USERS

Access to EIV data is limited. IPAs, when hired by an owner to perform the financial audit of the project, for use in determining the owner's compliance with verifying income and determining the accuracy of the rent and subsidy calculations are allowed to be given access to EIV data. HUD's restrictions on disclosure requirements for IPAs are as follows:

- J • Can only access EIV income information within hard copy files and only within the offices of the owner or management agent;
- Cannot transmit or transport EIV income information in any form;
- Cannot enter EIV income information on any portable media;
- Must sign non-disclosure oaths (Rules of Behavior) that the EIV income information will be used only for the purpose of the audit; and
- Cannot duplicate EIV income information or re-disclose EIV income information to any user not authorized by Section 435(j)(7) of the Social Security Act to have access to the EIV income data.

K By signing below, you certify that you have read and understand the EIV Privacy Policy for Auditors, the EIV Rules of Behavior, and agree to comply, under penalty of law.

Signatures:

User/Staff (Print Name)

Signature

Date

Supervisor (Print Name)

Signature

Date

EIV Coordinator (Print Name)

Signature

Date

WASS Coordinator (Print Name)

Signature

Date



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT C

HUD Secure Systems Access Guide

DRAFT FOR COMMENTS



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT D

EIV Security Binder, Checklist, & Configuration

DRAFT FOR COMMENTS

SECURITY BINDER SETUP & CHECKLIST

A The following documents must be made available to a HUD or Contract Administrator upon request. CCH requires that each Property retain the following documents, in the following order, in their EIV Security Binder (separate from the EIV Master Binder).

**EIV
NON-
USER
TAB**

- CCH EIV Privacy Policy for Auditors
 - Copies of the signed CCH EIV Privacy Policy for Auditors/Non-Users given within the past 36 months.
- Rules of Behavior (ROB)
 - Copies of the EIV User's signed Rules of Behavior for each EIV User at the Property
- CCH EIV Use and Security Policy Acknowledgement
 - Copies of the signed Acknowledgement of CCH's EIV Use and Security Policies and Procedures for each EIV User at the Property.

**EIV
USER
TAB**

- User Access Authorization Forms (UAAF)
 - Copies of the original and current UAAF for each EIV User at the Property
- Rules of Behavior (ROB)
 - Copies of the EIV User's signed Rules of Behavior for each EIV User at the Property
- Security Awareness Certificates
 - Copies of the Certificate of Completion for the Cyber Security Awareness trainings, must contain one per EIV User at the Property within the past 12 months
- CCH EIV Use and Security Policy Acknowledgement
 - Copies of the signed Acknowledgement of CCH's EIV Use and Security Policies and Procedures for each EIV User at the Property.

B

**EIV
COORD.
TAB**

- Owner Approval Letter
 - Copies of Owner Letters granting EIV Coordinator Access
- Coordinator Access Authorization Forms (CAAF)
 - Copies of the original and current UAAF for each EIV User at the Property
- Rules of Behavior (ROB)
 - Copies of the EIV User's signed Rules of Behavior for each EIV User at the Property
- Security Awareness Certificates
 - Copies of the Certificate of Completion for the Cyber Security Awareness trainings, must contain one per EIV User at the Property within the past 12 months
- CCH EIV Use and Security Policy Acknowledgement
 - Copies of the signed Acknowledgement of CCH's EIV Use and Security Policies and Procedures for each EIV User at the Property.



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT E

Discrepancy Log

DRAFT FOR COMMENTS



OPERATIONS

CCH EIV DISCREPANCY LOG

CCH USE AND SECURITY ACKNOWLEDGEMENT OF EIV SYSTEM



DISCREPANCY LOG

Discrepancy Month	Unit #	HOH Last Name Member Name	Determination	Brief Description	Dates			Resolution
					Notice	Meeting	Resolved	
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		N: / /			
		FN		M: / /				
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		R: / /			
		FN		N: / /				
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		M: / /			
		FN		R: / /				
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		N: / /			
		FN		M: / /				
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		R: / /			
		FN		N: / /				
		HOH	<input type="checkbox"/> Valid <input type="checkbox"/> Invalid <input type="radio"/> O/A <input type="radio"/> EIV		M: / /			
		FN		R: / /				

Our quality affordable housing properties in caring communities do not discriminate on the basis of race, color, religion, sex, disability, familial status, national origin, marital status, ancestry, source of income, age, medical condition (cancer/genetic characteristics), creed, Acquired Immune Deficiency Syndrome (AIDS), or AIDS related conditions (ARC), sexual orientation, gender, gender identity, gender expression, genetic information, citizenship, immigration status, primary language spoken, any arbitrary basis or any other basis protected by federal state or local law. A 504 Coordinator has been designated to coordinate compliance with the non-discrimination requirements contained in the Department of Housing and Urban Development's regulations and can be contacted at 1855 Olympic Boulevard, Suite 200; Walnut Creek, CA 94596 (510) 632-6712, TTY: 711, Cal DRE #473345 PAGE 1 OF 1



POLICY AND PROCEDURES
HUD EIV USE AND SECURITY



CCH Use and Security of HUD's Enterprise Income Verification System

EXHIBIT F

Document Destruction Log

DRAFT FOR COMMENTS

DESTRUCTION LOG			
Date	Documents Destroyed	Destruction Method	Employee Name/ WASS ID
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	
		<input type="checkbox"/> Shred <input type="checkbox"/> Burn <input type="checkbox"/> Pulverize	

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