

EIV Policies & Procedures

ABC Property Management

General EIV Administration

EIV reports will be produced and reviewed by staff responsible for:

- HUD eligibility determination
- HUD discrepancy analysis
- HUD compliance monitoring
- HUD compliance training

Reports will be produced, secured and maintained in accordance with the property's EIV Security Policy. 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 tenant/applicant file
- The EIV Discrepancy Log/Master File

EIV Discrepancy Log/Master File is divided into 6 categories:

1. EIV Periodic Reports Checklist and Destruction Logs
2. Employment/Income Discrepancy
3. Failed Identity Pre-Screening and Failed Verification Discrepancy
4. Multiple Subsidy/Existing Tenant Discrepancy
5. New Hire Discrepancy
6. Deceased Tenant Discrepancy

Information tracked in the EIV Discrepancy Log/Master File includes:

- Head of household name
- Unit number
- Name of member with discrepancy
- Brief description of discrepancy
- Date notice sent
- Date meeting scheduled
- Resolution
- Close Date
- Miscellaneous notes

Retention of EIV Reports

ABC Property Management will retain EIV reports as follows:

1. The Income Report, the Household Summary Report showing Identity Verification Status as "Verified" and the Income Discrepancy Report with supporting documentation will be retained in the tenant file for the term of tenancy plus three years.
2. Any tenant provided documentation, or other third party verification of income, received to supplement the SSA or NDNH data will be retained in the tenant file for the term of tenancy plus three years.

3. Results of the Existing Tenant Search will be retained with the application:
 - If applicant is not admitted, the application and search results will be retained for three Years.
 - If applicant is admitted, the application and search results will be retained in the tenant file for the term of tenancy plus three years.
4. The New Hires Report, Identity Verification Reports, Multiple Subsidy Report and Deceased Tenant Report kept in the master files for each property, will be retained for three years.

Existing Tenant and Applicant Notification

Existing tenants and applicants will be notified of the implementation of EIV through the Tenant Selection Plan and the HUD EIV and You pamphlet. Existing tenants have been provided the brochure no later than 1/31/2010 and will be offered the brochure again at least annually as part of the recertification process. Applicants will be provided the HUD EIV and You brochure before move-in.

Consent for the Release of EIV Information

A current form HUD-9887 will be on file before accessing the employment or income data contained in EIV for a tenant. This form will be signed and dated by each adult member of the household, the head of household, spouse or co-head, regardless of the age, and each family member who is 18 years of age or older.

Tenants are not required to report when a family member turns 18 years of age between annual recertifications. However, tenants must follow the requirements in their lease for reporting changes in the household income.

If the tenant, who turns 18, fails to sign the consent form(s) at the household's next recertification, the household will be in non-compliance with their lease and assistance to, and the tenancy of the household may be terminated in accordance with HUD guidelines.

Consent to Disclose an Individual's Information to another Person or Entity

The EIV data of an adult household member will 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.

With the written consent of the tenant, EIV may be shared with persons assisting the tenant with the recertification process. Parties to whom the tenant can provide written consent include:

- Service Coordinators (only if they are present at and assisting the tenant with the recertification process)
- Translators/Interpreters
- Individuals assisting an elderly individual or a person with a disability
- Guardians
- Powers of Attorney
- Other family members

Disclosure of EIV information to these parties will be employment or income information pertaining only to the tenant who has provided his/her consent. The signed consent form will be maintained in the tenant file.

Existing Tenant Report

Reports: Final eligibility review prior to Move In

Recordkeeping: Copies of the report will be maintained in the applicant/tenant file.

Policy: All applicants must disclose if they are currently receiving HUD housing assistance.

- **ABC Property Management** will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted unit.
- The Owner/Agent will use the Existing Tenant Report to determine if the applicant or any member of the applicant household may be receiving HUD assistance.
- **ABC Property Management** will follow-up with the respective PHA or Owner/Agent to confirm the individual's program participation status before admission.
- If the report indicates a possible double subsidy situation, **ABC Property Management** will discuss this with the applicant/tenant and if necessary the PHA or other O/A before admitting the applicant or recertifying the tenant.
- Failure to respond to requests for additional information and/or providing false or incomplete information will result in denial and removal from the waiting list in accordance with the property's current Tenant Selection Plan. Unintentional errors that do not cause preferential treatment will not be used as a basis to deny assistance.

Failed EIV Pre-Screening and Failed Verification Reports

Reports: Monthly

Recordkeeping: The Failed Pre-Screening and Failed Verification Reports will be printed monthly and retained in the EIV Master File for the corresponding property.

ABC Property Management will maintain detailed information about discrepancy investigation and resolution. This information will be maintained and documented in the EIV Discrepancy Log/Master File.

Policy: This report will be used to identify household members who failed the SSA identity match due to invalid personal identifiers, such as:

- Incorrect Social Security Number and/or
- Date of birth and/or
- Incorrect last name

ABC Property Management will review the tenant file to determine what type of error caused the discrepancy. If it is discovered that the error is a data entry error, the corresponding certification will be corrected within 30 days of the date on the report. The corrected 50059 will be signed by all adult household members and transmitted to TRACS. Notes regarding any corrective action(s) will be logged into the EIV Discrepancy Log/Master File for the corresponding property.

If the reason for the Failed Pre-Screening Report and/or Failed Verification Report discrepancy cannot be identified after a simple file review, **ABC Property Management** will issue a notice to the affected tenant and notify him/her that the Social Security Number, date of birth and/or the last name is causing a discrepancy. The tenant will have 10 business days to respond to the notice and schedule a meeting with **ABC Property Management**. Failure to respond to the notice will result in termination of assistance and/or tenancy pursuant to the HUD Handbook 4350.3 guidance.

During the meeting with the tenant, **ABC Property Management** will discuss the discrepancy and may request additional verification of the information provided. If the information provided by the tenant was inaccurate, **ABC Property Management** will issue a notice of material lease violation and begin the process to terminate assistance and/or tenancy as appropriate.

If **ABC Property Management** discovers that the Social Security Number provided was incorrect, we will attempt to recover subsidy paid in error. In these cases, **ABC Property Management** will:

- Create/correct appropriate certifications
- 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 the tenant refuses to sign the verification documents or attempts to refuse to return assistance paid in error, **ABC Property Management** will take appropriate action up to and including termination of assistance and/or tenancy and pursuit of fraud.

If the tenant claims that the information provided by EIV was inaccurate, a copy of the report and any supporting documentation provided by the tenant will be placed in the tenant file. The tenant must sign appropriate verification release forms and assist us in efforts to obtain verification of the information provided. In addition, the Failed Pre-Screening Report or Failed Verification Report will be printed and documented in the EIV Discrepancy Log/Master File noting when the discrepancy was reviewed and listing any verification documents used to support the information submitted on the tenant's 50059 certification.

Deceased Tenant Report

Reports: Quarterly

Recordkeeping: The Deceased Tenant Report will be printed and reviewed quarterly and retained in the EIV Discrepancy Log/Master File for each property. **ABC Property Management** will maintain detailed information about discrepancy investigation and resolution in the EIV Discrepancy Log/Master File.

Policy: If the report generates any discrepancies, **ABC Property Management** will confirm with the Head of Household, next of kin or emergency contact person to find out if the tenant has passed away. If necessary, an interim 50059 will be created to update the household composition and recalculate assistance. In the case where the deceased tenant is the sole member of a household, a move out HUD-50059A will be processed in accordance with the HUD Handbook.

If **ABC Property Management** verifies that the tenant is not deceased; we will encourage the tenant to contact the Social Security Administration to get the discrepancy resolved.

New Hires Report

Reports: Quarterly

Recordkeeping: The New Hires Summary will be printed quarterly and maintained in the EIV Discrepancy Log/Master File for each property. The New Hires Detail reports will be printed quarterly and maintained in the tenant file for the term of tenancy plus three years. Discrepancies will be documented in the EIV Discrepancy Log/Master File.

Policy: **ABC Property Management** will maintain the following detailed information regarding discrepancies in the tenant file:

- New Hire Detail Report
- Copy of notice to the tenant
- Copy of letters sent to 3rd party income source
- Copy of certification signed by the tenant disputing the employer and/or income
- All other correspondence, including documentation of verbal communication, in relation to resolution of the discrepancy

If a discrepancy is found, **ABC Property Management** will take all appropriate steps to verify through third party information relating to:

1. The amount of the wages, other earnings or income, or unemployment compensation involved
2. Whether the tenant actually has (or had) access to such wages, other earnings and income, or benefits for his or her own use
3. The period (or periods) when, or with respect to which, the tenant actually received such wages, other earnings and income, or benefits

ABC Property Management will not deny, suspend or reduce any benefits of a tenant until these steps have been taken.

When it is discovered that a tenant has an undisclosed new employment **ABC Property Management** will investigate the tenant's requirement to report. Tenants are currently required to report when:

1. An adult member of the household who was reported as unemployed on the most recent certification obtains employment;
2. The household income cumulatively increases by \$200 or more per month
3. There is a change in household composition

If a tenant fails to report as required, the household will be provided with a notice and will be required to meet with **ABC Property Management** within 10 days of the notice or face termination of subsidy. In these cases, **ABC Property Management** will:

- Request all assistance paid in error be returned to HUD in one lump sum
- Require that all assistance paid in error be returned to HUD as scheduled in an executed repayment agreement.

If the tenant refuses to sign the verification documents or attempts to refuse to return assistance paid in error, the tenant will be issued a notice of material lease violation and **ABC Property Management** will take appropriate action up to and including termination of assistance and/or tenancy and pursuit of fraud.

If the tenant claims that the information is invalid, the tenant must sign appropriate verification release forms. **ABC Property Management** will contact the employer listed in EIV to verify the information provided by the tenant. If all attempts to verify the EIV data are unsuccessful the tenant must certify that the employer and employment information displayed in EIV is invalid and has been wrongly attributed to his or her personal identifiers (SSN, Last Name and DOB). The tenant will be advised to contact the State Workforce Agency to have the employer or agency remove the invalid income information from his or her records.

Multiple Subsidy Report

Reports: Quarterly

Recordkeeping: The tenant file will be documented with

- Copy of the notice to the tenant
- Copy of letters sent to the landlord attempting to verify the EIV information

- Copy of the certification signed by the tenant disputing landlord's information reflected in EIV
- All other correspondence, including documentation of verbal communication, in relation to resolution of the discrepancy

In addition, ABC Property Management will maintain unresolved discrepancies in the EIV Discrepancy Log/Master File.

When the Multiple Subsidy Report is generated quarterly, even if the reports return no results, the report will be printed and retained in the EIV Discrepancy Log/Master File for each property.

Policy: If a discrepancy is found and the tenant appears to be in violation of HUD's rule regarding dual subsidy or multiple residences, the household will be sent an appropriate notice. The household will be required to meet with ABC Property Management or face termination and/or eviction as appropriate.

During the meeting, the tenant will be asked if the information in EIV is accurate. The tenant will sign appropriate verification release forms and ABC Property Management will contact the other landlord. We will determine the extent of the violation and 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.

If the tenant refuses to sign the verification documents or attempts to refuse to return assistance paid in error, the tenant will be provided with a notice of material lease violation and ABC Property Management will take appropriate action up to and including termination of assistance and/or tenancy and pursuit of fraud.

If the tenant claims that the information is invalid, the tenant must sign appropriate verification release forms. ABC Property Management will contact the landlord listed in EIV to verify the information provided by the tenant. If all attempts to verify the EIV data are unsuccessful the tenant must certify that the residence information displayed in EIV is invalid and has been wrongly attributed to his or her personal identifiers (SSN, Last Name and DOB). The tenant will be advised to contact the other landlord, and if unsuccessful, contact the local Contract Administrator or local HUD office to have the landlord or agency remove the invalid information from his or her records.

Household Summary Report

Reports: Within 90 Days after New Move-In or at next recertification.

Recordkeeping: The Household Summary Report(s) as SSN verification for all household members showing the Identity Verification Status as "Verified" will be printed within 90 days after new move in or at the next recertification. This report must be retained in the tenant file for no less than the term of tenancy plus three years.

Policy: ABC Property Management will use this report:

- a) At the time of recertification to review and resolve the status of any household member(s) with a "failed" or "deceased" status.
- b) As verification that a tenant's SSN has been "Verified" by SSA as being a valid SSN.

If the Summary Report in the tenant file shows an Identity Verification Status of "Verified" for all household members required to have a SSN, ABC Property Management will not continue to print out the Summary Report at recertification unless there is a change in household composition or in a household member's identity verification status. If the Summary Report does not show an Identity

Verification Status of “Verified”, ABC Property Management will continue to check the report monthly until the Identity Verification Status is “Verified”.

Income Reports

Reports: Initial, Annual and Interim Certifications and within 90 days after transmission of the move-in certification to TRACS. The Income Report must be printed *at the same time* as the Income Discrepancy Report.

Recordkeeping: Income reports used for verification will be printed and reviewed at each certification and within 90 days after transmission of the move-in certification to TRACS, and maintained in the resident file for no less than the term of tenancy plus three years.

Policy: In accordance with HUD guidelines, ABC Property Management will use the Income Report as the preferred 3rd party verification resource.

If the Social Security benefit information in EIV agrees with the amount the tenant reports, ABC Property Management will use the EIV printout as the 3rd party verification. If there are discrepancies between what EIV reports and the amount indicated by the tenant the tenant will be asked to disclose any deductions they may have from their SSA benefits and if necessary, to obtain a current award letter.

If the Income Report shows any Wage and/or Unemployment Compensation, ABC Property Management will obtain current verification documentation from the tenant in accordance with HUD regulations. Any income discrepancies found will be resolved within 30 days of the date on the Income Report.

Income Discrepancy Report

Reports: Initial, Annual and Interim Certifications and within 90 days after transmission of the move-in certification to TRACS. The Income Discrepancy Report must be printed *at the same time* as the Income Report.

Recordkeeping: Income reports used for verification will be printed and reviewed at each certification and within 90 days after transmission of the move-in certification to TRACS, and maintained in the resident file for no less than the term of tenancy plus three years.

ABC Property Management will maintain brief descriptions regarding income discrepancy investigation and resolution in the EIV Discrepancy Log/Master File. Detailed information regarding income discrepancy investigation and resolution will be maintained in the tenant file with the certification.

Policy: If a discrepancy is found, ABC Property Management will compare the SS, SSI, wage and unemployment compensation information reported on the HUD-50059 and any 3rd party verifications, with the employment and income information reported on EIV to determine whether or not there is a valid discrepancy. Any income discrepancies found will be resolved within 30 days of the date on the Income Report.

ABC Property Management will obtain independent verification of disputed EIV data. If a tenant fails to report as required, the household will be provided with a notice in accordance with HUD guidelines. If a discrepancy is found and if ABC Property Management determines that the tenant did not comply with the reporting requirements, an interim recertification will be created and rent changes will be

implemented as follows:

1. Rent increases: We will implement any resulting rent increase retroactive to the first of the month following the date that the action occurred
2. Rent decreases: Any resulting rent decrease will be implemented effective the 1st rent period following completion of the recertification.

No Income Report

Reports: Monthly

Recordkeeping: This report will be reviewed monthly and the EIV Discrepancy Log/Master File will be documented that the report has been reviewed. Tenant provided information regarding zero income will be maintained in the tenant file.

Policy: ABC Property Management will review this report and compare it with income information provided by the tenant. If a discrepancy is found, ABC Property Management will require the tenant to sign all appropriate verification forms to obtain correct income information. Any income discrepancies found will be resolved within 30 days of the date on the Income Report.

Tenants claiming Zero Income will recertify every 90 days. ABC Property Management will notify the household on a quarterly basis, with a 10 day interim notice, to attend an interview and provide verification and/or release verification forms. If an income change has occurred that requires a certification, ABC Property Management will process a certification, and a repayment agreement in accordance with HUD guidelines.

If a tenant reports a change resulting in zero income or marginal household income (less than \$100 month) ABC Property Management will require all adult households to complete a zero income questionnaire or monthly statement of income to identify all current and potential sources of income for the household.

ABC Property Management will review the zero income questionnaire submitted by the adult members for completeness and compare to reported income. If there is a discrepancy or potential unreported income the household will be asked for an explanation regarding the discrepancy.

If ABC Property Management finds reason to believe that the tenant is not properly reporting income, we will determine if the income should have been reported on the last annual, for an interim recertification, or if it will be considered at the next annual certification, based on the amount and source of income.

General EIV Security

EIV Coordinators Access & Security Training

- Each Coordinator will provide a Coordinator Access Authorization Form (CAAF).
- After initial setup, Coordinators will certify annually. Copies of the paper CAAF and the most recent, electronic CAAF will be retained and made available to the reviewer at the Management and Occupancy Review.
- Before granting access to the EIV information, the coordinator will ensure that each person will be trained in EIV Security policies & procedures.

- EIV Coordinators will be briefed at least annually on the security policy and procedures that require their awareness and compliance.
- Information about use access and training will be maintained in the property EIV file.
- EIV Coordinators will complete the appropriate EIV Security Awareness Training Questionnaire before requesting access. This questionnaire will be retained in the EIV periodic binder.

EIV Users Access & Security Training

- Each user will provide a User Access Authorization Form (UAAF).
- After initial setup. Users will certify semi-annually Copies of the paper UAAF and the most recent, electronic UAAF will be retained in the EIV periodic binder.
- EIV users will be briefed at least annually on the security policy and procedures that require their awareness and compliance. Information about use access and training will be maintained in the property EIV file.
- EIV Users will complete the appropriate EIV Security Awareness Training Questionnaire before requesting access. This questionnaire will be retained in the EIV periodic reporting binder.

Technical Safeguards

- Each coordinator/user will have a valid WASS User ID and password.
- WASS User IDs and passwords will not be shared.
- No one will access the system using another user's identity.
- Access to data is restricted based on UV role (EIV Coordinator or EIV user).
- EIV access and activity are regularly monitored and audited.

Administrative Safeguards

- Employment and income data is 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 different location.

The EIV coordinator for **ABC Property Management** will monitor access and:

- Obtain and retain owner approval letters
- Obtain and retain approved/current signed access authorization form
- Conduct periodic reviews to see if users have a valid need to access the EIV data
- Modify or revoke rights as appropriate
- Assign access and ensure access rights and responsibilities are appropriate
- Ensure that a signed copy of form HUD-9887 is on file for all adults living the unit
- Destroy EIV information in accordance with the property's EIV policy and HUD Requirements
- Ensure that all EIV users receive security training at time of implementation and at least annually thereafter
- Communicate Security information, such as:
 - Posters
 - Security Bulletins
 - Distribution of EIV manuals

- Detect, deter, and report improper disclosures, unauthorized access, or security breaches as necessary to:
 - HUD's Multifamily Help Desk
 - HUD's Security Officer
 - TRACS/EIV mailbox: MFTRACSSecurity@hud.gov
 - Mail To HUD
 - Notify the Office of Inspector General: email hotline@hudoig.gov.

Physical Safeguard Requirements

- EIV will be used only in designated secure areas.
- There will be controlled access to areas containing EIV information.
- The following physical safeguards will be used:
 - A. Storing & Transmitting of Electronic EIV Data
 - We do not allow any EIV data to be stored or transmitted electronically. However, if we do store or transmit EIV data electronically we will store it in a restricted access directory or, if placed on a portable media, labeled appropriately and encrypted using a NIST compliant vendor or if emailed it will be encrypted using a NIST compliant vendor.
 - B. Hardcopy EIV Data
 - Any EIV data that is printed out will not be left unattended. The EIV documents will be retrieved *as soon as* they are printed and when possible will be printed only at a restricted printer, copier or facsimile machine.
 - When faxing EIV data, we will ensure there is someone waiting and ready to retrieve the fax *as soon as* it is received & printed.
 - C. Computer Security
 - All Coordinators and Users of the EIV system access the system on computers that have a password protected screensaver. Users and Coordinators will lock their screens if they will be away from their computers and will not leave their computers unattended with EIV data displayed on the screen. In addition, if they are leaving their computer they will exit the ETV system using the "X" at the top right of the screen.
 - D. Destroying EIV Data
 - **ABC Property Management** will destroy all EIV information in accordance with the property's EIV policy and as prescribed by HUD's policies and procedures.
 - All EIV Data will be destroyed using HUD approved methods, such as burning, shredding or pulverizing.
 - **ABC Property Management** will keep a log of destroyed data including the date destroyed, how it was destroyed and by whom.

Rules of Behavior

Recordkeeping: Signed Rules of Behavior will be kept in the EIV Permanent Document file.

Policy: All **ABC Property Management** employees who are not EIV Coordinators or Users but who have access to tenant files will be required to read and sign the EIV Rules of Behavior.

EIV Printouts

EIV printouts will be maintained in the tenant file but 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 will be provided to the approved parties, when required, to facilitate compliance with HUD requirements.

EIV printouts to Auditors

Independent auditors (IPAs), hired by **ABC Property Management** to perform the financial audit of the project for use in determining our compliance with verifying income and determining the accuracy of the rent and subsidy calculations will be allowed to view EIV information with the following restrictions:

- Can only access EIV income information within hard copy files and only within the **ABC Property Management** offices.
- Must sign Rules of Behavior that the EIV income information will be used only for the purpose of the audit
- Cannot duplicate EIV Income Information or re-disclose EIV income information to any user not authorized by Section 435(D (7) of the Social Security Act to have access to the EIV income data.

EIV Printouts to Tenants

If a tenant requests a copy of their own EIV printout; a copy will be produced. The staff person providing the copy will note that the printout is a copy provided to the tenant upon request. This note will include the following information:

- **This is not an original, this is a copy provided to: Tenant Name**
- **Date**
- **Name of staff person providing the copy**
- **Tenant Initials**

ABC Property Management will make a note in the tenant file any time a copy of their EIV data is obtained by authorized persons. Under no circumstances will EIV information be provided to anyone other than those noted in this security policy.

Report	Frequency	Description	Where to find report
Failed Pre Screening Report Failed Verification Report	Monthly	Verification of personal identifiers such as SSN, Last Name or DOB submitted to TRACS. Invalid data on this report must be corrected and O/A must confirm data with tenants. If applicable, send a HUD-50059 to correct the discrepancy in the TRACS system.	Verification Reports; Identity Verification Reports, Verification Reports
Existing Tenant Report	Prior to Move In	Verification applicant/tenant is not receiving double subsidy. If report indicates a possible double subsidy situation the O/A should discuss findings with the applicant and if necessary the PHA or other O/A before admitting the applicant or recertifying the tenant.	Verification Reports; Existing Tenant Search
Multiple Subsidy Report	Quarterly and at all recertification's	Verification applicant/tenant is not receiving double subsidy. If report indicates a possible double subsidy situation the O/A should discuss findings with the applicant and if necessary the PHA or other O/A before admitting the applicant or recertifying the tenant.	Verification Reports; Multiple Subsidy Report
Deceased Tenant Report	Quarterly and at all recertification's	Identifies Household members who SSA records matched against EIV show that person is deceased O/A must confirm death in writing with remaining household members, next of kin or emergency contact person. If deceased, the O/A must update the HUD-50059; if a single member household is identified as deceased, O/A should terminate tenancy and process move-out using form HUD-50059-A.	Verification Reports; Deceased Tenant Search
Income Report	Initial, Annual, Interim Certifications and within 90 days after transmission of the move-in certification to TRACS.	Used to verify the employment and income of tenants. The income report serves as 3 rd party verification of employment, unless the tenant disputes the employment or income information reported. If tenant disputes this information, O/A must note this on the report and follow established guidelines for obtaining 3 rd party verification directly from the reporting source. Note: EIV data does not serve as 3 rd party verification of amount of <i>income</i> for employment. Other 2nd party documents must be obtained for this purpose.	Income Information, Select Contract; income report
Income Discrepancy Report	Initial, Annual, Interim Certifications and within 90 days after transmission of the move-in certification to TRACS.	The income discrepancy report identifies tenants whose income reported on TRACS differs by more than \$2400 a year from the actual income reported by SSA and HHS. O/A's must investigate, document and resolve any discrepancies in income on this report within 30 days of the date on the report.	Income Information; Select Contract; Income Discrepancy Report
No Income Report	Initial, Annual, Interim Certifications and within 90 days after transmission of the move-in certification to TRACS.	Shows tenants whose identity was verified by SSA but that do not show income in EV from sources matched in EIV. O/A's must have a policy to re-verify tenants reporting \$0 income at least quarterly and to use EIV to determine if any income has been reported since the last certification	Income Information; Select Contract; No Income Report
New Hires Report	Quarterly	Provides new employment information from W-4's entered by employers for tenants who <i>may</i> have started new jobs within the last 6 months. O/A's must investigate, document and resolve discrepant information within 30 days of the date on the report.	Income Information; Select Contract; New Hires Report