

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Special Attention of:

Multifamily Hub Directors
Multifamily Program Center Directors
Supervisory Housing Project Managers
Rural Housing Services (RHS) Directors
Housing Project Managers
Contract Administrators
Owners and Management Agents Administering
Multifamily Housing Assistance Programs

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SUBJECT: Enterprise Income Verification (EIV) System

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I. PURPOSE.

The purpose of this Notice is to provide updated instructions to owners and management agents (O/As) administering Multifamily Housing's rental assistance programs listed in Section II, Applicability. Instructions are provided on using the data in EIV for verifying, at the time of recertification, the employment and income of individuals participating in one of these rental assistance programs and for using reports and data available in EIV. In addition to use by O/As, EIV reports may also be used by Contract Administrators (CAs) (Performance Based Contract Administrators (PBCAs), Traditional Contract Administrators (TCAs) and HUD staff) for monitoring the O/A's compliance with the recertification process; independent public auditors (IPAs) auditing an owner's compliance with verifying income and the accuracy of rent/subsidy determinations; and, the Office of Inspector General (IG) for auditing purposes. See Section IX, Security of EIV Data, for more information on official use of EIV data.

Although using the EIV system for upfront income verification (UIV) is not mandatory at this time, it is anticipated that use of the system will become mandatory on January 31, 2010. Using the data in EIV will assist HUD in meeting the Rental Housing Integrity Improvement Project's (RHIIIP's) goal of ensuring that the *right benefits go to the right* persons by reducing errors in determining a tenant's income, thereby reducing the number of improper payments in Multifamily Housing's rental assistance programs.

For information on obtaining access to EIV go to the Multifamily EIV website at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>.

II. APPLICABILITY.

This notice applies to administrators of the following programs:

- A. Project-based Section 8
 - 1. New Construction
 - 2. State Agency Financed
 - 3. Substantial Rehabilitation
 - 4. Section 202/8
 - 5. Rural Housing Services (RHS) Section 515/8
 - 6. Loan Management Set-Aside (LMSA)
 - 7. Property Disposition Set-Aside (PDSA)
- B. Section 101 Rent Supplement
- C. Section 202/162 Project Assistance Contract (PAC)
- D. Section 202 Project Rental Assistance Contract (PRAC)
- E. Section 811 PRAC
- F. Section 236
- G. Section 236 Rental Assistance Payments (RAP)
- H. Section 221(d)(3) Below Market Interest Rate (BMIR)

NOTE: This Notice does not apply to the Low Income Housing Tax Credit (LIHTC) program for O/A's completion of the LIHTC certification or for LIHTC compliance monitoring by state officials. It also does not apply to the RHS Section 515 program for certification of tenants who do not receive Section 8 assistance or for compliance monitoring by RHS staff for tenants receiving Section 8 assistance. See Section IX, Security of EIV Data, for information on why this Notice is not applicable to these programs.

III. BACKGROUND.

In 2001, OMB released the President's Management Agenda which established the reduction of erroneous payments as a key government-wide priority, evidenced by the *Eliminating Improper Payments* initiative, which requires agencies to measure improper payments annually, develop improvement targets and corrective actions, and track results. At this time, HUD established the RHIIP to address the causes of errors and improper payments in HUD's assisted housing programs and to ensure that *the right benefits go to the right persons*. HUD also established a goal to reduce the estimated dollar amount of improper rent subsidies by 50 percent from fiscal year (FY) 2000, when the baseline was established, to FY 2005. This goal was surpassed with a 67 percent reduction in net subsidy overpayments reported.

In 2004, to assist in meeting the RHIIP initiative goals, HUD developed and began implementation of the Upfront Income Verification (UIV) system, now known as the EIV system. The EIV system serves as a central repository and source for income and benefit data, securely accessible over the internet, for use by Public Housing Authorities (PHAs) and O/As to improve the accuracy of rent and income determinations.

The UIV system was originally only available to PHAs and provided them with income information on wages and unemployment benefits provided through matching agreements with individual states. In 2004, HUD received statutory authority to negotiate a matching agreement with the Department of Health and Human Services (HHS) to conduct computer matching with National Directory of New Hires (NDNH) data. While the first matching agreement between HUD and HHS only made the NDNH data available to PHAs, a subsequent agreement was reached in FY 2007 making the information available to Multifamily Housing's O/As. The subsequent agreement allows HUD to disclose the NDNH information to O/As for use in verifying, at the time of recertification, the employment and income of tenants participating in one of Multifamily Housing's rental assistance programs, to CAs for monitoring the O/A's compliance with the recertification process and to the IG for auditing purposes. HHS later approved disclosure of NDNH information to IPAs hired by an owner to conduct the financial audit of their property for use by the IPA in determining the owner's compliance with income verification and accuracy of rent/subsidy determinations (see Section IX, Security of EIV Data, for restrictions on disclosure of NDNH information to IPAs).

In addition to the NDNH data, the data received from the Social Security Administration (SSA), formerly available for use by O/As through the Tenant Assessment Subsystem (TASS), was made available through the EIV system.

IV. EMPLOYMENT AND INCOME DATA AVAILABLE IN EIV.

A. Social Security Administration (SSA).

1. Social Security (SS) benefits
2. Supplemental Security Income (SSI) benefits
3. Dual Entitlement benefits
4. Medicare premium information
5. Disability status

B. National Directory of New Hires (NDNH).

1. New hires (W-4)
2. Quarterly wages for federal and non-federal employees
3. Quarterly unemployment compensation benefits

V. SCHEDULE FOR UPDATING EIV DATA.

A. Tenant Rental Assistance Certification Subsystem (TRACS) File.

Tenant information in EIV is data from the most recent, active form HUD-50059, Owner's Certification of Compliance with HUD's Tenant Eligibility and Rent Procedures, in TRACS.

At the time Multifamily Housing began using EIV, baseline data was provided to EIV from TRACS consisting of the latest data on all active tenants in Multifamily Housing's rental assistance programs.

Currently, a daily update is provided each morning from TRACS of tenants participating in Multifamily Housing's rental assistance programs. This data is uploaded into the EIV system the following evening. Therefore, there is a time lag of one day between the tenant data in TRACS and when it appears in EIV.

NOTE: Only tenants where there is an active certification in TRACS will be included in the TRACS file sent to EIV.

Household members coded as a live-in aide in TRACS are excluded from the TRACS file since their income is excluded from annual income. (See Chapter 5, Figure 5-2 and Exhibit 5-1 of Handbook 4350.3 REV-1, *Occupancy Requirements of Subsidized Multifamily Housing Programs*).

B. Pre-screening of Personal Identifiers in TRACS.

A pre-screening of the personal identifiers (social security number (SSN), last name and date of birth (DOB)) of tenants participating in Multifamily Housing's rental assistance programs contained in the TRACS file is conducted prior to sending the file to SSA for the identity match described in C, below. Tenants who do not pass this pre-screening because of a missing or invalid personal identifier are not sent to SSA for the identity match.

O/As must use the Failed EIV Pre-Screening Report described in Section VI.B.2.c monthly to identify those tenants who did not pass the pre-screening test and the reason(s) they did not pass and make any necessary corrections in the data transmitted to TRACS. Once the corrected information is transmitted to TRACS, the tenant information is included in the SSA identity match the following month.

See Attachment 1 for the EIV Error Codes for the EIV SSA Pre-Screening Test.

C. SSA Verification of Personal Identifiers.

The personal identifiers (SSN, last name, DOB) for each tenant participating in one of Multifamily Housing's rental assistance programs that passes the pre-screening test are matched against SSA's records.

1. For those tenants who pass the identity match against SSA's records, the following information is provided in EIV, if available:
 - a. SS, SSI and dual entitlement benefits, Medicare premium data, and disability status contained in the SSA database.
 - b. New Hires (W-4), wage and unemployment compensation benefits contained in the NDNH database.
2. Although a tenant passes the identity match against SSA's records it does not guarantee there will be NDNH or SSA data in the EIV system. If the employer or state unemployment agency does not provide the information to the state or if the state or the SSA district offices do not update their records and forward the information to the NDNH or SSA master files, EIV will not have employment or income information for a tenant.

It could also be a case where the tenant does not have any employment income, unemployment insurance income or is not receiving any social security benefits, whereby the tenant will show up on the No Income Report in EIV. However, this does not mean that the tenant does not have any income. See Section VI.B.1.c for more information on the No Income Report.

3. For those tenants that fail the identity match against SSA's records:
 - a. No employment or income information will be provided by SSA or HHS.
 - b. SSA will provide information on why the verification failed.
See Attachment 2, List of Error Messages on the Failed Verification Report. Refer to Section VI.B.2.c.(2) for instructions on following up with tenants and for correcting invalid information.

D. Social Security Benefits.

1. EIV uses the data from TRACS for tenants who pass the SSA identity match to perform a quarterly SS/SSI/dual entitlement income match with the SSA. Each quarter the entire tenant population is matched with SSA. Each month during a quarter, a group of tenants are matched based on their next recertification month.
2. Records that are new or that have been significantly updated are matched in the next monthly SSA matching cycle month.
3. The SSA match process begins at the beginning of each month with all of the data being loaded into EIV by the second week of the month.
4. The SSA cost of living adjustments (COLAs) are not available from SSA for uploading into EIV until the end of the calendar year. When processing recertifications effective January 1, February 1, March 1, and April 1, in order to complete the Recertification Steps outlined in Figure 7-3 of Handbook 4350.3 REV-1 and provide the tenant with the required 30-day notice of any increase in rent, the O/A may:
 - a. Use the benefit information reported in EIV that does not include the COLA as third party verification as long as the income data in EIV agrees with the income the tenant reports he/she is receiving.

O/As are not required to verify discrepant amounts reported in EIV that are less than \$2,400 per year unless the tenant disputes the EIV information. Since COLAs would generally be less than \$2,400 per year, the O/A must not recertify these tenants (recertifications effective January 1, February 1, March 1 or April 1) when the benefit data in EIV becomes available that includes the COLA amount, unless the tenant reports, as required by their lease, that the household's income has cumulatively increased by \$200 or more per month (\$2,400 per year). In cases where the tenant reports that the household's income has cumulatively increased by \$200 or more per month, the O/A must complete an interim recertification in accordance with the requirements in Chapter 7, Section 2 of Handbook 4350.3 REV-1.

- b. Use the benefit or award letter provided by the tenant if the tenant has received his/her benefit or award letter that includes the COLA adjustment and the letter is dated within the last 120 days of receipt by the owner. (See Paragraph 5-17.B.1 of Handbook 4350.3 REV-1 for Effective Term of Verifications.)
 - c. Determine the tenant's income by applying the COLA increase percentage to the current verified benefit amount and document the tenant file with how the income was determined, e.g., copy of the EIV Income Report or the SSA benefit or award letter and applying the COLA percentage to arrive at the tenant's annual income.
 - d. Request third party verification directly from SSA when the income in EIV does not agree with the income the tenant reports he/she is receiving, or the tenant disputes the EIV data. (See Section VI.B.1.a.(1)(b).)
5. All recertifications effective after April 1 must reflect the SSA benefit that includes the COLA.
 6. EIV retains the last eight actions processed by SSA for a tenant.

NOTE: The SSA has published notification that there will be no COLA increases for 2010.

E. NDNH (New Hires (W-4), Wage and Unemployment Compensation).

1. Tenants who pass the identity match with SSA are matched with the new hires (W-4), wage and unemployment benefit data contained in the NDNH.
2. There are two types of matches that are conducted against the NDNH data:
 - a. The first is a Monthly match – In this type of match, the entire eligible tenant base is matched with the new hires (W-4) database and only the newly admitted tenants are matched with the wage and unemployment benefit data.
 - b. The second is a Quarterly match – In this type of match, the entire eligible tenant base is matched with the new hires (W-4), wage and unemployment benefit data.

Month	Type of Match
January	Monthly
February	Quarterly
March	Monthly
April	Monthly
May	Quarterly
June	Monthly
July	Monthly
August	Quarterly
September	Monthly
October	Monthly
November	Quarterly
December	Monthly

3. The new hires (W-4), wage and unemployment benefit data is loaded into EIV by the 20th of each month.
4. EIV retains NDNH employment and income data for a tenant for two years (8 quarters).

VI. USING EIV DATA AND REPORTS.

A. Requirements for Using EIV Data.

1. Updating O/A Requirements.

a. Tenant Selection Plan.

O/As using the Existing Tenant Search in EIV as part of their screening criteria for new tenants must include written policies for using the search in their Tenant Selection Plan.

b. Policies and Procedures.

O/As using EIV must have written policies and procedures for using the EIV employment and income data and EIV verification reports at the time of recertification. In addition, O/As who elect to use any of the reports at times other than at recertification, e.g., the Income Discrepancy Report and/or the New Hires Report, must also include in their policies and procedures information for staff to follow for using the reports and data.

Following written policies and procedures will ensure that applicants and tenants are treated fairly and are not being discriminated against.

2. Consent for the Release of Information.

a. Applicants.

O/As do not need a form HUD-9887, *Notice and Consent for the Release of Information*, signed by the applicant or applicant family members on file in order to use the Existing Tenant Search in EIV. See Section VI.B.2.a, below, for a discussion on the Existing Tenant Search.

b. Tenants.

- (1) A form HUD-9887 must be on file before accessing the income reports in EIV for an individual. However, the form HUD-9887 is not required for accessing the verification reports (see Section VI.B covering the Income Reports and Verification Reports).
- (2) Before accessing the employment or income data contained in EIV for a tenant, the O/A must make sure there is a current form HUD-9887 on file. The form must be signed and dated by:
 - Each adult member of a household regardless of whether he or she has income.
 - The head of household, spouse, co-head and each family member who is at least 18 years of age must sign and date the form at move-in, at initial (when tenant begins receiving a subsidized rent, e.g., Section 236 tenant begins receiving Section 8) and annual recertification.
 - A family member when he/she turns 18.

The form is valid for 15 months from the date of signature.

- (3) The form HUD-9887 authorizes HUD and the O/A to use data obtained through computer matching with another agency for verifying the individual's income used for establishing the eligibility for and level of benefits under HUD's assisted housing programs. The form also authorizes HUD and the O/A to seek wage, new hire (W-4) and unemployment claim information from current or former employers to verify information obtained through computer matching.
- (4) In addition to the form HUD-9887, the O/A must make sure a signed and dated form HUD-9887-A, *Applicant's/Tenant's Consent to the Release of Information*, is on file. This form authorizes the O/A to request information about the tenant from a third party source.

- (5) Both forms HUD-9887 and HUD-9987-A limit the O/A from requesting information about a tenant to “within the last 5 years when the tenant received assistance”.

See Paragraphs 5-15 and 5-21 of HUD Handbook 4350.3 REV-1 for more information on the HUD-9887 and HUD-9887-A forms.

c. Disclosing an Individual’s Information to Another Person or Entity.

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, unless the individual has provided written consent to disclose such information. However, the O/A is not prohibited from discussing with the head of household (HOH) and showing the HOH how the household’s income and rent were determined based on the total income reported and verified.

3. Tenant Notification of Recertification.

O/As are required to provide reminder notices to tenants informing them of their responsibility to provide the O/A with information about changes in family income or composition that are necessary to properly complete an annual recertification. The notification must be in writing and must include a list of information that tenants are required to bring with them to their recertification interview. This list must include documentation needed to support the income they are receiving as well as documentation to support any deductions they may be eligible to receive. For example, elderly and disabled tenants should be requested to bring in information related to social security benefits, e.g., benefit letter from SSA, and medical expenses and tenants who are working should be requested to bring in documentation, e.g. check stubs, to support the income they are currently receiving.

Having the necessary documentation available at the time of the recertification interview will save time in completing the recertification process. In addition, asking the right questions at the time of the interview will ensure that the correct information has been provided and will assist in reducing errors in income and rent determinations.

See Chapter 7, Paragraph 7-7 and Exhibits 7-1, 7-2, 7-3 and 7-4 of Handbook 4350.3 REV-1 for additional information on the recertification notification requirements and the *Guide to Interviewing for Owners of HUD Subsidized Multifamily Housing Projects* posted on the Multifamily RHIIP website at <http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm> for guidance on asking the right questions during the recertification interview.

When the employment and income information in EIV is the same as what the tenant reports he/she is receiving, the O/A can use the EIV Income Report for third party verification and tenant provided documents for income calculation purposes. This new process of accepting tenant provided documentation in conjunction with the EIV data replaces the more time-consuming, costly and less accurate third party verification process currently used by O/As.

4. Employment and Income Information.

The employment and income information contained in EIV may be used by O/As at the time of recertification only for verifying the employment and income of tenants currently being assisted under one of Multifamily Housing's rental assistance programs listed in Section II. See Attachment 5, Using EIV Data Flow Chart.

5. Independent Third Party Verification.

- a. O/As must obtain independent third party verification which is used to complement EIV data when:
 - (1) The tenant disputes the EIV data;
 - (2) The tenant is unable to provide the O/A with acceptable and current income documentation;
 - (3) There is incomplete EIV data for a tenant; or
 - (4) There is no EIV data for a tenant.

See Section VI.B.1.a.(1)(b) for obtaining *Proof of Income Letter*, from SSA. Also, see Chapter 5, Paragraph 5-13 of Handbook 4350.3 REV-1 for information on acceptable verification methods.

- b. When the O/A is unable to obtain third party verification, e.g., the third party does not respond, the tenant file must be documented why third party verification was not available. See Chapter 5, Paragraph 5-19.E of Handbook 4350.3 REV-1.
- c. O/As always have the discretion to obtain additional third party verification of income or verification of other EIV data based on circumstances encountered during the recertification process.

B. Using EIV Reports.

At the time of recertification, O/As must use the EIV reports to verify the employment and income of tenants participating in one of Multifamily Housing's

rental assistance programs. Reports such as the New Hires Report, Income Discrepancy Report, etc. may be used other than at recertification as addressed in the O/A's policies and procedures (see Section VI.A.1.b). In addition to detailed reports that provide employment and income information for individual tenants, EIV contains verification reports that O/As may access for each of their projects or contracts.

O/As should refer to the EIV User Manual for Multifamily Housing Program Users for information on accessing the reports and for further descriptions of the reports. The manual is posted at:
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>

1. Income Reports.

a. Income Report.

O/As must use the Income Report at the time of recertification and at other times as indicated in their policies and procedures (see Section VI.A.1.b). This report provides O/As with employment and income information on tenants participating in one of Multifamily Housing's rental assistance programs. The report provides information on tenants who have started new employment within the past few months, quarterly wage information for past or current employment, unemployment insurance benefits, social security benefits, Medicare premiums, and SSA disability status.

O/As must print and retain a copy of the Income Report(s) in the tenant's file. In most cases, the printed report will serve as third party verification. If the tenant disputes the information on the Income Report, the O/A should note this on the report and the tenant file must include verification obtained directly from the third party source.

For additional information on determining income and calculating rent, see Chapter 5 of Handbook 4350.3 REV-1.

(1) Social Security Benefits

- (a) If the tenant agrees with the social security benefit information reported in EIV, the O/A will use the EIV Income Report as third party verification and the gross benefit amount reported for calculating the tenant's income. If applicable, the Medicare premium paid by the tenant will also be included in the medical expense deduction calculation.

Example One:

EIV shows the tenant is receiving a gross social security benefit of \$980.40 per month, net social security benefit of \$884, and the Medicare premium of \$96.40 is being paid by the tenant and the tenant agrees that this information is accurate. The O/A will use the EIV Income Report as the third party verification that the tenant is receiving SS benefits and the gross benefit amount from the Income Report for calculating the tenant's income.

The data used for rent calculations would be:

Gross annual income \$11,764.80 ($\980.40×12)

Medical expense \$1,156.80 ($\96.40×12)

Example Two:

EIV shows the tenant is receiving a gross social security benefit of \$701 per month, net social security benefit of \$701, and the Medicare premium of \$96.40 is being paid by the state or another entity and the tenant agrees that this information is correct. The O/A will use the EIV Income Report as the third party verification that the tenant is receiving SS benefits and the gross benefit amount for calculating the tenant's income.

The data used for rent calculations is:

Gross annual income \$8,412 ($\701×12)

Medical expense – None

Since the Medicare premium is being paid by the state or another entity, the Medicare premium is not included as a medical expense.

When the Medicare premium is being paid by the state or another entity, there is a "Y" in the buy-in column and the date when the third party started paying the tenant's Medicare premium is included in the "Buy-in Start" column of the Medicare Data section of the Income Report.

- (b) If the SSA information in EIV does not agree with the amount the tenant reports he/she receives, when the tenant disputes the EIV data, or when there is no SSA information in EIV, the O/A must obtain third party verification by asking the tenant to provide a copy of their benefit letter, dated within the last 120 days of receipt by the owner. The O/A should not send the tenant to the SSA office if they do not have this information. Instead, the O/A should

ask the tenant to request benefit information from SSA using SSA's web site, the preferred method, or using SSA's toll-free number.

- (i) The O/A may assist the tenant in requesting benefit information using SSA's website at www.ssa.gov. To request a *Proof of Income Letter*, go to: <https://secure.ssa.gov/apps6z/BEVE/main.html> and follow the instructions.
 - (ii) To request a *Proof of Income Letter* from SSA's toll-free number call 1- 800-772-1213.
 - (iii) This information is free and the tenant should receive the letter in the mail within 10 days. The tenant will provide the Proof of Income Letter to the O/A for use in calculating their income. A copy of the letter will be retained in the tenant's file and the original returned to the tenant for their records.
- (c) While the SSA provides information on Medicare premiums it does not provide as part of the computer matching, information on additional deductions such as Medicare Part D (prescription drugs) premiums or garnishments. Therefore, O/As need to request that tenants disclose any deductions they may have from their SSA benefits. For example, if the tenant is paying his/her Medicare premium and the difference between the gross and net SS benefits exceeds the amount of the Medicare premium, the O/A must discuss this with the tenant, determine the reason for the difference and, if applicable, obtain additional third party verification to support any of the deductions that may affect the tenant's income or allowable expenses.
- (d) The disability status information received from SSA is not 100 percent accurate and should not be used for determining whether or not a tenant qualifies as disabled for eligibility for a HUD program or for the elderly household allowance. However, receipt of social security disability benefits is adequate verification of an individual's disability for some of HUD's programs. See Paragraph 3-28.B and Appendix 3, Acceptable Forms of Verification, of Handbook 4350.3 REV-1, for further guidance on verifying a disability.
- (e) If an O/A discovers there is an error in the data provided by SSA, e.g., the tenant is being reported by SSA as being deceased when he/she is still living, the O/A should advise the tenant of the discrepant information. It is the tenant's responsibility to contact

the SSA to get the information corrected. HUD cannot remove or correct the information in EIV reported by the SSA.

- (f) If the O/A finds it necessary to use some other alternative form of verification, e.g., bank statements, it may be necessary to use more than one document as third party verification. Documents such as bank statements only disclose the net amount of social security received and not the gross amount used for determining the tenant's annual income. This information will not support allowing inclusion of the Medicare premium as a medical expense if the tenant claims he/she is paying the Medicare premium. When alternative forms of verification are used, the O/A must document the tenant's file why third party verification was not obtained. See Appendix 3, Acceptable Forms of Verification, and Paragraph 5-19.E, Documenting Why Third-Party Verification is Not Available, of Handbook 4350.3 REV-1.

(2) NDNH (New Hires (W-4), Wage and Unemployment Compensation)

- (a) The NDNH employment and unemployment income information in EIV may only be used as third party verification of the tenant's employment and is **not** to be used to calculate the tenant's income. O/As will use documentation provided by the tenant, e.g., pay stubs, unemployment benefit information, etc., to calculate the tenant's income unless circumstances require the O/A to obtain third party verification directly from the employer or unemployment agency.
- (b) If the information in EIV agrees with the employment and income the tenant reports he/she receives, the O/A will use the EIV income report as third party verification of the tenant's employment and request the tenant to provide documentation, e.g., check stubs, that will support his/her current income being received. The O/A will then use the documentation provided by the tenant for determining the tenant's income. The O/A will annualize the tenant's income using the current income projected forward for the next 12-months. O/As will make copies of any tenant provided documents and return originals to the tenant.

Example:

EIV shows that the tenant is working at Jack's Restaurant and the tenant has reported he/she works at Jack's Restaurant. The tenant has brought in his/her four most current, consecutive check stubs (see Paragraph 5-13.C.3.b of Handbook 4350.3 REV-1). The O/A will use the Income Report in EIV as third party verification that

the tenant is employed at Jack's Restaurant and use the gross pay shown on the check stubs provided by the tenant for determining the tenant's income.

Check stubs – gross pay 1) \$120; 2) \$145; 3) \$125; 4) \$130
 $\$120 + \$145 + \$125 + \$130 = \$520$
 $\$520 / 4 = \130 average gross pay per week

$\$130 \times 52 = \$6,760$ gross annual income

- (c) If the information in EIV does not agree with the employment and income that the tenant reports, or if the tenant disputes the EIV data, the O/A must obtain third party verification directly from the employer for use in determining the tenant's income.
- (d) When no employment or income information is available in EIV and the tenant reports he/she is working, the O/A must request third party verification directly from the employer.
- (e) There may also be times when the O/A will need to request third party verification directly from the source in order to have all of the information needed to determine the tenant's income. For example, employers are not required to report the "Hire Date" when submitting their data to the state; therefore, the O/A may need to obtain third party verification for new employment reported for a tenant in order to obtain this information. (See Attachment 3 for data elements that are optional for employers to report to the state.)
- (f) If an O/A discovers that the income reported for wages or unemployment compensation does not belong to his/her tenant, the O/A should advise the tenant. It is the tenant's responsibility to contact the employer or state unemployment agency to get the information corrected. HUD cannot remove the information reported for the tenant from EIV. The O/A must:
- Attempt to obtain written third party verification from the employer to verify the EIV information.
 - Have the tenant certify that the employer and employment information displayed in EIV is invalid and has been wrongly attributed to his or her personal identifiers.
 - Advise the tenant to contact the third party income source, and if unsuccessful, the State Wage Agency in his or her state to request the information be removed from his or her record.

- Keep documentation on the above in the tenant file.

If identity theft is suspected, the O/A should refer the tenant to SSA’s website at www.ssa.gov for information on reporting identity theft or to local agencies who may assist the tenant in getting the matter resolved.

(3) Applicants

Since EIV only contains employment and income data for tenants participating in Multifamily Housing’s rental assistance programs, the O/A must request third party verification directly from the income source for determining the applicant’s income for eligibility and rent calculation purposes.

b. Income Discrepancy Report.

- (1) At the time of recertification, O/As are to review and resolve any discrepancies in income reported on the Income Discrepancy Report. O/As must identify any unreporting or underreporting of income by the tenant and reported on current or historical form HUD-50059s.
- (2) This report lists households whose wage, unemployment or social security benefits income reported in EIV is \$2,400 or more than the wage, unemployment or social security benefit income reported by the family and transmitted to TRACS.

NOTE: Wage, unemployment and social security income in TRACS includes:

<u>Income Code</u>	<u>Type of Income</u>
B	Business
F	Federal Wage
M	Military Pay
W	Nonfederal Wage
U	Unemployment
SS	Social Security
SI	Supplemental Security Income (SSI)

- (3) Since the income discrepancies reported in EIV are determined by comparing the wage, unemployment and social security benefits income reported by NDNH or SSA with the wage, unemployment and social security benefits income reported by the family and transmitted to TRACS, it is the O/A’s responsibility to make sure the information in TRACS agrees with the information on the form HUD-50059 in the

tenant's file. The O/A must correct any discrepant information in the TRACS database.

- (4) It is important that the O/A print the Income Discrepancy Report at the time of recertification, if applicable, as each week a completely new report is generated based on the current information in the system for a tenant. The old report is overwritten with the current data.
- (5) The O/A must retain a printed copy of the Income Discrepancy Report along with detailed information on the resolution of the reported discrepancy in the tenant file. This includes information on resolution of the discrepancy regardless of whether the discrepancy was found to be valid or invalid.
- (6) The O/A will follow the guidance in Chapter 8, Paragraph 8-17, Procedures for Addressing Discrepancies and Errors, of Handbook 4350.3 REV-1.

See Attachment 4 for detailed information on the Income Discrepancy Report and a sample discrepancy. In addition to the information provided in Attachment 4, O/As should refer to the instructions in the document "Resolving Income Discrepancies Between Enterprise Income Verification (EIV) System Data and Tenant-Provided Income Information" posted on the Multifamily EIV website at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/reqnguide.cfm>

O/As are also encouraged to view the latest EIV webcast for further information on how to use the report for resolving discrepancies. The webcast is posted at: <http://www.hud.gov/webcasts/archives/multifamily.cfm>

O/As can apply for access to TRACS at: https://hudapps.hud.gov/public/wass/public/participant/partreg_page.jsp

c. No Income Report.

This report is a listing of tenants who passed the identity match against SSA's records but no employment or income information was received from the match against either the SSA or NDNH records. Because no income was reported as a result of the match against SSA or NDNH records does not mean that the tenant(s) does not have income. The O/A must make sure that the right questions are asked at the interview conducted with the tenant(s) at the time of recertification so that the tenant(s) is given the opportunity to disclose any income they receive.

It is recommended that O/As have a policy to re-verify the status of tenants reporting zero income at least quarterly. As part of the procedures for implementing the policy, the O/A should use EIV to determine if the tenant, or any family members, have income reported by HHS or SSA.

d. New Hires Report.

It is recommended that O/As use this report no less than quarterly. This report provides employment information on tenants who have started new jobs within the last six months. The information in this report is updated monthly.

Because tenants participating in one of Multifamily Housing's rental assistance programs are required to report changes in income when the household's income cumulatively increases by \$200 or more per month, O/As may be proactive in outreaching to their tenants to report the income changes so that rent adjustments can be made in a timely manner, thus eliminating/reducing the amount of retroactive rent repayments. O/As choosing to use the New Hires Report at times other than at recertification must address use of the report in their Policies and Procedures (see Section VI.A.1.b).

See Paragraph 7-10.A and the HUD Model Leases in Appendix 4 of Handbook 4350.3 REV-1 for change in income reporting requirements.

2. Verification Reports.

a. Existing Tenant Search.

O/As should use this report at the time they are processing an application to determine if the applicant or any applicant household members are currently residing at another Multifamily Housing or Public and Indian Housing (PIH) location.. EIV gives the O/A the option to query both the TRACS and Public and Indian Housing's (PIH's) Information Center (PIC) databases.

If the applicant or a member of the applicant's household is residing at another location, the O/A should discuss this with the applicant, giving the applicant the opportunity to explain any circumstances relative to his/her being assisted at another location. This may be a case where the applicant wants to move from his/her existing location or where two assisted families share custody of a minor child.

Depending on the outcome of the discussion with the applicant, the O/A may need to follow-up with the respective PHA or O/A to confirm the individual's program participation status before admission. The report

gives the O/A the ability to coordinate move-out and move-in dates with the PHA or O/A of the property at the other location.

b. **Multiple Subsidy Report.**

It is recommended that O/As use the Multiple Subsidy Report no less than quarterly. This report allows the O/A to search within the TRACS and PIH's PIC databases to identify individuals who may be receiving multiple rental subsidies. The O/A can search by:

- All household members
- Only adult household members
- Only household members under the age of 18

If the report shows that a tenant is being assisted at another location, the O/A should discuss this with the tenant, giving the tenant the opportunity to explain any circumstances relative to his/her being assisted at another location.

The O/A may also need to follow-up with the respective PHA or O/A to confirm that the tenant is being assisted at the other location. Depending on the results of this investigation, the O/A may need to take action to terminate the tenant's assistance or tenancy. (See Chapter 8, Section 1 and 2 of Handbook 4350.3 REV-1 for procedures for terminating assistance and/or tenancy.)

NOTE: HUD does not prohibit owners of partially subsidized projects from housing tenants who are receiving assistance through the Housing Choice Voucher program. While these tenants may appear on the Multiple Subsidy Report, HUD does not consider them as receiving double subsidy. (See Paragraph 3-21 of Handbook 4350.3 REV-1 for a discussion on Applicants with Housing Choice Vouchers.) In these instances, O/As should print out a copy of the Multiple Subsidy Report and note that the tenant has a Housing Choice Voucher and is not receiving double subsidy, e.g., tenant is residing in a Section 236 unit and receiving rental assistance through the Housing Choice Voucher program.

c. **Identity Verification Report.**

There are two reports that can be accessed from the Identity Verification Report. O/As must use both of these reports monthly to clear up any invalid, discrepant or missing information in the TRACS database.

(1) Failed EIV Pre-Screening Report.

This report provides a listing of tenants who fail the EIV pre-screening test because of invalid or missing personal identifiers (SSN, last name or DOB). The tenants on this list will not be sent to SSA from EIV for the SSA identity match.

O/As must:

- (a) Use this report to identify those tenants that did not pass the pre-screening test and the reason(s) they did not pass so that the errors can be corrected.
- (b) Confirm with the affected tenant their SSN, DOB and/or last name.
- (c) Obtain third party verification or documentation to support the tenant's personal identifiers and the accuracy of the information on the form HUD-50059 in the tenant's file and in TRACS.
- (d) Correct any discrepant information in the TRACS system so that the tenant will be included in the TRACS file provided to EIV for inclusion in the SSA identity match.

See Attachment 1 for the EIV Error Codes for the EIV SSA Pre-Screening Test.

(2) Failed Verification Report (Failed the SSA Identity Test).

This report identifies household members who failed the SSA identity match due to invalid personal identifiers (SSN, last name or DOB), as well as, identifies deceased household members. (See Attachment 2 for a List of Error Messages on the Failed Verification Report).

O/As must:

- (a) Use this report to identify those tenants that did not pass the SSA identity verification match and the reason(s) they did not pass so that the errors can be corrected.
- (b) Confirm with the affected tenant their SSN, DOB and/or last name.
- (c) Obtain third party verification or documentation to support the tenant's personal identifiers and the accuracy of the form HUD-50059 and TRACS data.

- (d) Correct any discrepant information in the TRACS system so that the tenant will be included in the match against SSA and NDNH data.
- (e) Encourage the tenant to contact the SSA to correct any inaccurate data in their databases if the personal identifiers on the form HUD-50059 and in TRACS are accurate. The tenant can request SSA to correct his/her record by completing and submitting form SS-5, *Application for a Social Security Card*, to the local SSA office.

See the Deceased Tenant Report in (d) below for more information on tenants reported by SSA as deceased.

d. Deceased Tenant Report.

It is recommended that O/As use this report no less than quarterly. This report identifies tenants who are participating in one of Multifamily Housing's rental assistance programs who are reported by SSA as being deceased.

O/As will:

- (1) Confirm with the head-of-household, next of kin or emergency contact person whether or not the person is deceased.
- (2) Update the family composition on the form HUD-50059 if the person is deceased, or in the case of a deceased single member of a household, process a form HUD-50059 to terminate tenancy.
- (3) Correct any discrepant information in the TRACS system.
- (4) Encourage the tenant to contact the SSA to correct any inaccurate data in their databases if the person shown as being deceased in the SSA database is not deceased.

VII. INVESTIGATING AND RESOLVING INCOME DISCREPANCIES.

A. Investigating Discrepancies.

- 1. O/As must investigate and confirm possible discrepancies and errors. O/As may not suspend, terminate, reduce, make a final denial of rental assistance, or take any other adverse action against an individual based solely on the data in EIV.
- 2. When the employment and income data in EIV is not the same as reported by the tenant, or when the tenant disputes the EIV data, O/As must

independently verify any information by obtaining third party verification directly from the third party source.

3. The O/A must notify the tenant of the results of the third party verification and request the tenant come into the office, within 10 days of notification, to discuss the results (see Chapter 8, Paragraph 8-17 of Handbook 4350.3 REV-1). The tenant may contest the findings in the same manner as applies to other information and findings relating to eligibility factors.
4. If the O/A determines that the tenant is in non-compliance with his/her lease because he/she knowingly provided incomplete or inaccurate information, the O/A must follow the guidance in Chapter 8, Section 3 of Handbook 4350.3 REV-1, for terminating the tenant's tenancy and Chapter 8, Paragraph 8-18 for the requirements on filing a civil action against the tenant to recover improper subsidy payments.
5. Where fraud is suspected, the O/A should report this to the HUD OIG Office of Investigation in the District that has jurisdiction in the state the project is located.

B. Unreporting or Underreporting of Income.

If the O/A determines the tenant unreported or underreported his/her income, the O/A must go back to the time the unreported or underreporting of income started, not to exceed the 5-year limitation that the tenant was receiving assistance discussed on forms HUD-9887 and HUD-9887-A, and calculate the difference between the amount of rent the tenant should have paid and the amount of rent the tenant was charged. A record of this calculation must be provided to the tenant and also retained in the tenant's file.

The O/A must have the form HUD-50059(s) on file that was in effect during the period(s) that the tenant had unreported or underreported income, along with any supporting documentation, in order to calculate the amount the tenant must reimburse to the owner. The form HUD-50059(s) is the document whereby the tenant(s) certifies to the accuracy of the income included on the form. If the O/A does not have this historical information, the O/A cannot go back to the tenant for unreported or underreported income.

C. Tenant Repayment of Unreported or Underreported Income.

1. Tenant's Obligation to Reimburse.

Tenants are obligated to reimburse the O/A if they are charged less rent than required by HUD's rent formula due to underreporting or failure to report income. The tenant is required to reimburse the O/A for the difference between the rent that should have been paid and the rent that was charged.

(See Paragraph 18 of the HUD Model Lease for Subsidized Programs, Paragraph 14 of the Section 202/8 and 202/162 PAC lease and Paragraph 12 of the Section 202 and Section 811 PRAC leases found in Appendix 4 and Paragraph 8-13.A.5 of Handbook 4350.3 REV-1.).

2. Repayment Options.

a. Tenants can repay amounts due:

- (1) In a lump sum payment; or
- (2) By entering into a repayment agreement with the O/A; or
- (3) A combination of (1) and (2), above.

For example, a tenant may owe \$1,000, make a lump sum payment of \$300 and enter into a repayment agreement for the remaining \$700.

b. Tenants who do not agree to repay amounts due in accordance with 2.a, above, will be in non-compliance with their lease agreement and may be subject to termination of tenancy. (See Paragraph 8-13.A.5 of Handbook 4350.3 REV-1.)

c. Tenants may also be required to repay funds to the O/A due to a:

- (1) Civil action taken by the O/A, or
- (2) Court action as a result of an IG investigation.

3. Repayment Agreements.

a. The tenant and O/A must both agree on the terms of the repayment agreement.

The tenant may wish to consult with HUD's Housing Counseling Agency in their area to assist them in working with the O/A to reach agreeable terms for the repayment agreement. See the Housing Counseling Agency website for a listing of agencies for each state at <http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm>

(1) Monthly Payment.

The tenant's monthly payment must be what the tenant can afford to pay based on the family's income.

The monthly payment plus the amount of rent the tenant/family pays at the time the repayment agreement is executed should not exceed 40 percent of the family's monthly adjusted income.

Example:

- Family's monthly adjusted income is \$1,230.
- Family's monthly rent payment is \$369 (30% of the family's monthly adjusted income).
- 40% of the family's monthly adjusted income is \$492.
- The monthly payment for the repayment agreement should not exceed \$123 per month ($\$492 - \$369 = \123)
($\$369$ monthly rent + $\$123$ repayment = $\$492$, 40% of the family's monthly adjusted income.)

(2) Repayment Time Period.

The time period for repayment by the tenant of the amount owed.

Example : The tenant agrees to repay \$1,000, and agrees to monthly payments of \$25. $\$1,000/\$25 = 40$ months (time period).

- b. The repayment agreement must reference the paragraphs in the lease whereby the tenant is in non-compliance and may be subject to termination of their lease.
- c. The repayment agreement should contain a clause whereby the terms of the agreement can be renegotiated if there is a decrease or increase in the family's income.
- d. The repayment agreement must be signed and dated by the tenant and the O/A.
- e. O/As must not apply a tenant's monthly rent payment towards the repayment amount owed that would result in an accumulation of late rent payments. The monthly payment due on the repayment agreement is in addition to the tenant's monthly rent payment.
- f. Tenants are not required to reimburse the O/A for undercharges caused solely by the O/A's failure to follow HUD's procedures for computing rent or assistance payments. (See Chapter 8, Paragraph 8-20.B.2, of Handbook 4350.3 REV-1 addressing the O/A's obligation to reimburse HUD for overpayments of assistance due to the owner's failure to follow HUD's procedures.)

4. Disposition of Funds Received by O/A.

a. O/As are required to reimburse funds collected from the tenant to HUD in accordance with the requirements in Chapter 8, Paragraph 20 of Handbook 4350.3 REV-1.

(1) O/As should be familiar with their software's capability that allows for adding Miscellaneous Accounting Requests to the housing assistance payments (HAP) voucher (form HUD-52670) as the procedures vary from software to software. O/As should consult their software documentation or software provider if assistance is required.

(2) After verifying the tenant's income, the O/A must complete corrections to a prior certification(s) affected by the income change. O/As must not fail to correct the prior certification(s) in an attempt to avoid having large negative adjustments appear on the HAP voucher.

(3) Voucher adjustments:

(a) If the tenant is able to pay the entire amount due in one lump sum payment, no Miscellaneous Accounting Request is needed.

(b) If the tenant pays a lump sum payment and enters into a repayment agreement for the remaining amount due, the O/A must first reverse the adjustment created by correcting the prior certification(s) less the lump sum payment by adding an O/A initiated accounting adjustment (OARQ) Miscellaneous Accounting Request to the voucher.

Example: If the total adjustment is -\$1,240 (indicating that \$1,240 in subsidy is being returned to HUD) and the tenant pays \$480 in a lump sum, the OARQ request is for \$760 (\$1,240 - \$480). The comment field must be completed describing the transaction, e.g. "Reversal of adjustments subject to repayment – Unit 1023, John Smith."

(c) Adjustments for payments received from the tenant per the repayment agreement are made as addressed in (e), below.

NOTE: The comment field allows for 78 characters to describe the transaction.

(d) If the tenant is subject to a repayment agreement, the O/A must first reverse the full amount of the voucher adjustment created by correcting the prior certification(s).

Example: If the total of the adjustments is -\$1,240 (indicating that \$1,240 in subsidy is being returned to HUD), the OARQ request will be for \$1,240. This leaves the voucher unaffected by the retroactive corrections to a recertification(s). The comment field must be completed describing the transaction, e.g., “Reversal of adjustments subject to repayment – Unit 1023, John Smith.”

- (e) As the tenant makes payments per the repayment agreement, the O/A must enter them as negative amounts on the voucher as OARQ Miscellaneous Accounting Requests.

Example: The tenant pays \$50, the OARQ will be for -\$50. The comment field must be completed describing the transaction, e.g., “Repayment – Unit 1023- John Smith.”

If the O/A is deducting his/her costs from the payment received from the tenant, the OARQ Miscellaneous Account Request will be for the amount collected from the tenant less the O/A’s costs.

Example: The tenant pays \$50 and the O/A’s costs are \$8, the OARQ would be for -\$42. The comment field must be completed describing the transaction, e.g., “Repayment – Unit 1023 – John Smith - \$50 collected less costs of \$8.”

- (f) O/As should consult the TRACS Monthly Activity Transmission (MAT) User’s Guide to obtain updated instructions on Miscellaneous Account Requests.

- b. O/As may retain a portion of the repayments they actually collect from the tenants who have improperly reported their income at the time of certification or recertification to help defray the cost of pursuing these cases (this is not limited to cases where the O/A has determined fraud). O/As may only retain an amount to cover their actual costs, which is the lesser of:

- (1) their actual costs, or
- (2) 20 percent of the amount received from the tenant.

- c. Amounts retained by O/As must be deposited into the project’s operating account to offset the expenses incurred for these cases.
- d. As with all income and expenses of the project, O/As must keep records of the receipt and disbursement of all amounts collected from the tenant for audit purposes. At a minimum, the owner must record:

(1) Date and amount(s) received from the tenant;

(2) Expenses incurred;

Examples of types of expenses incurred include staff time for verifying the unreported income; meeting with tenant; drafting repayment agreements; generating and sending monthly invoices to tenant; generating manual voucher adjustments; collection agency fees, if applicable; and, meeting state requirements.

(3) Amount(s) retained; and

(4) Voucher date(s) and amount(s) of reimbursement made to HUD.

D. Tenant Income Previously Over-reported.

1. Tenants are responsible for reporting decreases in income (see Paragraph 16.b of the HUD Model Lease for Subsidized Programs, Paragraph 23.b for the Section 202/8 and Section 202/162 PAC lease and Paragraph 24.b for the Section 202 PRAC and Section 811 PRAC leases).
2. If, however, the O/A finds at the time of recertification that the annual income reported in EIV for the previous year(s) is less than what was reported on the form HUD-50059(s), the O/A should discuss this with the tenant. If the tenant agrees with the reduced income and reports a reason for the reduction, e.g., worked fewer hours, got laid-off, no longer receives SSI, etc., the O/A must take action to verify the income directly with the third party source.
 - (a) After verifying the tenant's income, the O/A must complete corrections to the prior certification(s) affected by the income change. Once the corrections have been made, the O/A will determine the difference between the amount of rent the tenant paid and the rent that the tenant should have paid.
 - (b) The O/A must reimburse the tenant the amount of overpayment of rent in accordance with Chapter 8, Paragraph 8-21 of Handbook 4350.3 REV-1.
3. If, during their review of the tenant file, the O/A or the CA determines that an error was made in the income calculation based on the income verifications on file, the O/A must make the necessary adjustments to the tenant's rent for the period the error occurred as discussed in 2, above.

VIII. RETENTION OF EIV INCOME DATA.

A. O/As must retain:

1. The social security benefit reports and the new hires (W-4), wage and unemployment income reports obtained from EIV that are used as third party verification for the term of tenancy plus three years after tenancy is terminated.
 2. Any tenant provided documentation, or other third party verification of income, received to supplement the SSA or NDNH data for the term of tenancy plus three years after tenancy is terminated.
- B. Once the retention period has expired, O/As must dispose of the data in a manner that will prevent any unauthorized access to personal information, e.g., burn, pulverize, shred, etc.

IX. SECURITY OF EIV DATA.

The data in EIV contains personal information on individual tenants that is covered by the Privacy Act. The information in EIV may only be used for limited official purposes:

A. Official Purpose Includes.

1. O/As, in connection with the administration of Multifamily Housing programs, for verifying the employment and income at the time of recertification.
2. CAs (PBCAs and TCAs) and HUD staff for monitoring and oversight of the tenant recertification process. (See the Rent and Income Determination Quality Control Monitoring Guide for Multifamily Housing Programs and the most recent EIV webcast for EIV monitoring requirements.)
3. 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.

Restrictions on disclosure requirements for IPAs:

- (a) Can only access EIV income information within hard copy files and only within the offices of the owner or management agent;
- (b) Cannot transmit or transport EIV income information in any form;
- (c) Cannot enter EIV income information on any portable media;
- (d) Must sign non-disclosure oaths (Rules of Behavior) that the EIV income information will be used only for the purpose of the audit; and

(e) 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.

4. OIG investigators for auditing purposes.

B. Official Purpose Does NOT Include.

1. Sharing the information with governmental entities not involved in the recertification process used for HUD's assisted housing programs, e.g., the LIHTC program and RHS Section 515 program.

As previously stated in the Note in Section II, this Notice does not apply to the LIHTC program for O/A's completion of the LIHTC certification or for LIHTC compliance monitoring by state officials. It also does not apply to the RHS Section 515 program for certification of tenants who do not receive Section 8 assistance or for compliance monitoring by RHS staff for tenants receiving Section 8 assistance.

Disclosing the EIV information to O/As for use under the LIHTC and RHS Section 515 programs is not allowed since neither the Internal Revenue Service (IRS) nor RHS are a party to the computer matching agreements with HHS and SSA. The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs does not then permit that federal agency to use or view information in the EIV system that is covered by the computer matching agreements. The computer matching agreements are governed by the Privacy Act and the Social Security Act. For example, Sections 453(j)(7)(E)(ii) and (iv) of the Social Security Act limit disclosure of the data matched between HUD and HHS' NDNH to public housing agencies, the IG, the Attorney General, private owners, management agents and CAs. HHS subsequently approved disclosure of NDNH information to IPAs hired by an owner to conduct the financial audit of their property.

2. Disclosure of the EIV information to Service Coordinators even though the tenant signs a release of information consent form authorizing the Service Coordinator to have access to their file. The statute authorizing the computer matching identifies those parties to whom the information can be disclosed and the statute does not include Service Coordinators.

C. Penalties for Willful Disclosure or Inspection of EIV Data.

1. **Unauthorized Disclosure** – felony conviction and fine up to \$5,000 or imprisonment up to five (5) years, as well as civil damages.

2. **Unauthorized Inspection** – misdemeanor penalty of up to \$1,000 and/or one (1) year imprisonment, as well as civil damages.

D. Rules of Behavior (ROB).

1. Users With EIV System Access.

All EIV users who have access to the EIV system must adhere to the EIV ROB signed at the time of requesting access to the EIV system. EIV access authorization forms are posted on the Multifamily EIV website at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/coordinatoraccess.pdf> and

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/useraccess.pdf>

The signed initial and current access authorization forms containing the ROB must be kept on file. Upon request, the signed forms must be made available to the entity monitoring EIV compliance.

2. Users Without EIV System Access.

- a. O/A staff, service bureau staff and CA staff who do not have access to the EIV system but who view or use EIV data/reports provided by authorized EIV coordinators or users in order to perform their job functions, must adhere to the EIV ROB posted on the Multifamily EIV website at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>

The ROB must be signed and kept on file. Upon request, the signed ROB must be made available to the entity monitoring EIV compliance.

- b. IPAs hired by the owner to perform a financial audit must adhere to the Rules of Behavior posted on the Multifamily EIV website at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>

The ROB must be signed by the IPA and kept on file. Upon request, the signed ROB must be made available to the entity monitoring EIV compliance.

E. Security Training.

1. EIV users are required to have security training annually. EIV users authorized by owners to have access to the EIV data must complete the applicable online Security Awareness Training Questionnaire for Multifamily Housing Programs upon initial access to the system and annually thereafter.
2. EIV users should review Section 4 on Security contained in the Multifamily EIV User Manual for Multifamily Housing Program Users posted at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf>

3. EIV users should also view the Security training provided during the most recent EIV webcast, posted at:
<http://www.hud.gov/webcasts/archives/multifamily.cfm>

X. TOOLS AND RESOURCES.

- Multifamily Housing EIV web site:
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>
- EIV Multifamily Help Desk
Telephone: 202-708-7588
Email: Mf_Eiv@hud.gov
- Enterprise Income Verification (EIV 9.1) System User Manual for Multifamily Housing Program Users
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf>
- Rental Housing Integrity Improvement Project (RHIP) website:
<http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>
- Resolving Income Discrepancies Between Enterprise Income Verification (EIV) System Data and Tenant-Provided Income Information”
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/reqnguide.cfm>
- Handbook 4350.3 REV-1, *Occupancy Requirements of Subsidized Multifamily Housing Programs*
<http://www.hud.gov/offices/adm/hudclips/handbooks/hsg/4350.3/index.cfm>
- EIV webcast
<http://www.hud.gov/webcasts/archives/multifamily.cfm>
- EIV training provided to HUD RHIP Help Desk Representatives and Contract Administrators.
<http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>
- A Guide to Interviewing for Owners of HUD Subsidized Multifamily Housing Projects
<http://www.hud.gov/offices/hsg/mfh/rhiip/interviewguide.pdf>
- Rent and Income Determination Quality Control Monitoring Guide for Multifamily Housing Programs
<http://www.hud.gov/offices/hsg/mfh/rhiip/qcguide.pdf>

If you have questions regarding this Notice or need more information on the EIV system, please contact your local Contract Administrator or local HUD field office.

XI. PAPERWORK REDUCTION.

The information collection requirements contained in this notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3520) and assigned OMB Control Number 2502-0204. In

accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

David H. Stevens
Assistant Secretary for Housing -
Federal Housing Commissioner

- Attachment 1 – EIV Error Codes for the EIV SSA Pre-screening Test
- Attachment 2 – Appendix A from the EIV User Manual for Multifamily Housing Program Users (EIV 9.1) – List of Error Messages on the Failed Verification Report
- Attachment 3 – NDNH data elements
- Attachment 4 – Income Discrepancy Report
- Attachment 5 – Using EIV Data Flow Chart

Attachment 1: EIV Error Codes for the EIV SSA Pre-Screening Test

Error Code	Error Short Description	Error Long Description
1	Failed effective date check	The effective date of action is more than 15 months old
2	Failed DOB check	The date of birth is blank or null
3	Failed last name check	The last name is blank or null
4	Failed SSN check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE(_00%) or LIKE (%0000)
5	Failed DOB and effective date check	The date of birth is blank or null and the effective date of action is more than 15 months old
6	Failed last name and effective date check	The last name is blank of null and the effective date of action is more than 15 months old
7	Failed last name and DOB check	The last name is blank or null and the date of birth is blank or null
8	Failed SSN and effective date check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (\$0000) and the effective date of action is more than 15 months old
9	Failed SSN and DOB check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (999%) and the date of birth is blank or null
10	Failed SSN and last name check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE %0000) and the last name is blank or null
11	Failed last name and DOB and effective date check	The last name is blank or null and the date of birth is blank and the effective date of action is more than 15 months old
12	Failed SSN and DOB and effective date check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (%0000) and the date of birth is blank or null and the effective date of action is more than 15 months old
13	Failed SSN and last name and effective date check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (%0000) and the last name is blank or null and the effective date of action is more than 15 months old
14	Failed SSN and last name and DOB check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (%0000) and the last name is blank or null and the date of birth is blank or null
15	Failed SSN and last name and DOB and effective date check	The SSN is not numeric or all 9s or LIKE (000%) or LIKE (_00%) or LIKE (%0000) and the last name is blank or null and the date of birth is blank or null and the effective date of action is more than 15 months old

Attachment 2: List of Error Messages on the Failed Verification Report

Error Description	Explanation
Member SSN not sent to SSA – Invalid SSN	The tenant's record was not sent to the SSA because the SSN failed the preliminary validation checks conducted by EIV.
Member SSN not sent to SSA – Live-in aide	The tenant's record was not sent to the SSA because the relationship code indicated that the individual was a live-in aide. The income of a live-in aide is not to be included in eligibility and rent calculations.
Verification failed – SSN not found in SSA records	The tenant's SSN is not a valid number issued by the SSA. Note: The message also includes the SSN reported in SSA.
Verification failed – SSN was not verified by SSA	The tenant's SSN is not a valid number issued by the SSA.
Verification failed – Surname matched, but date of birth did not match with SSA records	The tenant's identity was not verified because while the Surname matched with SSA records, the Date of Birth did not match. However, based on the SSN/Last Name combination, SSA has indicated that the tenant <u>does not receive SS/SSI</u> benefits.
Verification failed – Date of birth matched, but surname did not match with SSA records	The tenant's identity was not verified because while the Date of Birth matched with SSA records, the Surname did not match. However, based on the SSN/Date of Birth combination, SSA has indicated that the tenant <u>does not receive SS/SSI</u> benefits.
Verification failed – SS benefits cannot be disclosed due to discrepancy in date of birth	The tenant's identity was verified by SSA based on the SSN/Last Name combination and the tenant <u>is receiving SS</u> benefits. However, due to the discrepancy in the Date of Birth, the benefit information cannot be disclosed.
Verification failed – SS benefits cannot be disclosed due to discrepancy in name	The tenant's identity was verified by SSA based on the SSN/Date of Birth combination and the tenant <u>is receiving SS</u> benefits. However, due to the discrepancy in the Last Name, the benefit information cannot be disclosed.

Error Description	Explanation
Verification failed – SSI benefits cannot be disclosed due to discrepancy in date of birth	The tenant’s identity was verified by SSA based on the SSN/Last Name combination and the tenant <u>is receiving SSI benefits</u> . However, due to the discrepancy in the Date of Birth, the benefit information cannot be disclosed.
Verification failed - SSI benefits cannot be disclosed due to discrepancy in name	The tenant’s record was not sent to the SSA because the relationship code indicated that the individual was a live-in aide. The income of a live-in aide is not to be included in eligibility and rent calculations.
Verification failed - SS and SSI benefits cannot be disclosed due to discrepancy in date of birth	The tenant’s identity was verified by SSA based on the SSN/Last Name combination and the tenant <u>is receiving both SS and SSI benefits</u> . However, due to the discrepancy in the Date of Birth, the benefit information cannot be disclosed.
Verification failed – SS and SSI benefits cannot be disclosed due to discrepancy in name	The tenant’s identity was verified by SSA based on the SSN/Date of Birth combination and the tenant <u>is receiving both SS and SSI benefits</u> . However, due to the discrepancy in the Last Name, the benefit information cannot be disclosed.

NOTE: If the SSA’s records are wrong, only the tenant can request SSA to correct his/her record by completing and submitting form SS-5, *Application for a Social Security Card*, to the local SSA office.

Attachment 3: National Directory of New Hires (NDNH) Data Elements

The following data elements are requested by HUD from the NDNH database. The following provides information on those data elements that are optional for employers to provide to the various states. All of these data elements may not be elements normally displayed in EIV. For those data elements that are displayed in EIV, information may not be made available because the employer is not required to report the data to the state, therefore, no information is available in the NDNH database.

Quarterly Wage File

- Employee SSN
- Employee Name
- Employer Name
- Employer Address
- Quarterly employee wage amount
- Date quarterly wage record processed by NDNH
- Federal Employee Identification Number (EIN) (optional for an employer to report)
- State EIN (optional for an employer to report)
- Department of Defense indicator, if any

New Hire File

- Employee SSN
- Employee Last Name
- Employee First Name
- Employee Address (optional for an employer to report)
- Employer Name
- Employer Address
- Employee Date of Hire (optional for an employer to report)
- Employee State of Hire (optional for an employer to report)
- Employer Federal EIN (optional for an employer to report)
- Employer State EIN (optional for an employer to report)
- Employer's Second Address, if any (optional for an employer to report)
- Department of Defense indicator, if any
- Date New Hire Record processed by NDNH

Unemployment Insurance File

- Claimant SSN
- Claimant Last Name
- Claimant First Name
- Claimant's Address (optional for an employer to report)
- Benefit Amount
- Unemployment reporting period

Attachment 4: Income Discrepancy Report

The Income Discrepancy Report compares the tenant's projected **next year's** income as reported in TRACS to the actual income data compiled by EIV.

1. Identifying the Period of Income (PI) for Discrepancy Analysis

The period of income provides the timeline reference governing the collection of the data used to determine whether or not a discrepancy exists between projected household income (as reported in TRACS) and actual income (EIV income data that was available at the time the projection was made). This period of income is determined in order to gather the actual income data needed to make a comparison to the projected income and determine whether a discrepancy exists.

The period of income uses the following timeline of events to assist in determining the specific time span that is taken into consideration when collecting and calculating income data.

- **Effective Date of Action** – This value represents the effective date appearing on the form HUD-50059 reported in TRACS for the identified tenant. It is used to calculate the Period of Income Start and End Date values selected for the Period of Income for Discrepancy Analysis.
- **Period of Income Start Date** – This date represents the starting point for the income period. It is calculated by EIV based on the effective date associated with the form HUD-50059 reported in TRACS for the tenant. It is assumed that the Period of Income Start date is 15 months prior to the effective date on the form HUD-50059 reported in TRACS.
- **Period of Income End Date** – This date represents the end of the period of income and is assumed to be 3 months prior to the effective date on the form HUD-50059 reported in TRACS. (This is the approximate time frame for the tenant interview.) The Period of Income End Date is 12 months from the Period of Income Start Date.

2. Identifying Projected Income

Projected income information is used as the baseline for discrepancy calculations. It is derived from the form HUD-50059 records stored in the TRACS database. The income projected information is used to determine whether or not a given household should have an Income Discrepancy Report. The determination is made using the following evaluation criteria.

- Selected form HUD-50059 records will come directly from the current TRACS database. There is no need to access the TRACS database to obtain projected household income information.
- EIV will review the current TRACS database to locate the most current form HUD-50059 record for a household that falls in the timeline of 3 to 15 months.

- Prior to the Effective Date of Action. The most recent record falling within that timeline is used as the source for projected income information.
- Form HUD-50059 records in TRACS with an effective date that falls within the specified 3 to 15 months timeline, and includes an action type of MI, AR, IR or IC, is included in the Income Discrepancy Report calculations.

Action Types – Included in the Income Discrepancy Report Calculations	Definition
MI	Move In
AR	Annual Recertification
IR	Interim Recertification
IC	Initial Certification

- Data from households that lack SSA verification or that fails the SSA verification will not be included in the calculations.
- If a form HUD-50059 record in TRACS does not meet the qualification criteria, the household is excluded from the Income Discrepancy Report.

3. Identifying the Actual Income reported during the Period of Income

Actual income information is used to evaluate the accuracy of an income projection. It is compared to the projected income value stored on the form HUD-50059 in TRACS associated with the household. These values are:

Income Code	Type of Income
B	Business
F	Federal Wage
M	Military Pay
W	Nonfederal Wage
U	Unemployment
SS	Social Security
SI	Supplemental Security Income

EIV income information is not considered to be conclusive proof if a tenant challenges that it is not current or complete. One factor is time lag in the collection of SSA and NDNH data. In such cases, the employment information, including the “new hires” information will help the O/A research the tenant’s income.

4. Prorating Actual Income

When the period of income includes a Period of Income Start Date that coincides with income reporting quarters, the income is simply added for those quarters. In those cases

where an income record overlaps the start or end of the period of consideration, the income is prorated, based on the following calculation.

- First Quarter income = (quarter income value / period of time) x length of time in period. For example, if the income is within the period of consideration for 2 or 3 months, the calculation would be (quarter income value / 3 months) x 2 months.
- Sum the quarter income that occurs within the period of consideration. This should be 3 quarters of data.
- Add the final quarter of income data. Quarter income = (quarter income value / period of time) x (length of time considered).

5. Calculating Income Discrepancies

Once projected and actual income data has been captured, the discrepancy evaluation process begins. EIV conducts two separate evaluations during the Income Discrepancy Report generation process. The outcome determines whether or not the results should be included in the Income Discrepancy Report.

Income discrepancies are calculated in the following manner:

Discrepancy 1 – Entire period of consideration versus income projected is calculated as follows:

(Projected Annual Wages and Benefits from form HUD-50059 data in TRACS) –
(Reported Annual Wages and Benefits as derived from EIV data.)

Discrepancy 2 – Last quarter of period of consideration annualized against projection is calculated as follows:

- ❖ Actual EIV Income = final quarter income data (prorated as first and final quarter income in calculating total income for period of income against projection) x 4 quarters.
- ❖ Projected Annual Wages and Benefits from form HUD-50059 data in TRACS – Actual EIV Income

6. Discrepancy Analysis

Once the income discrepancy calculations are completed, EIV analyzes the results to determine whether an Income Discrepancy Report should be generated. The analysis compares the results to a pre-defined EIV system value – Discrepancy Cutoff.

The Discrepancy Cutoff variable establishes the monetary value that the calculated discrepancy must exceed in order for the household to be included on the Income Discrepancy Report. By default, this value is set to \$2,400. This means that the discrepancy between the actual annual income value and the projected income must be at least \$2,400 or greater in order for a discrepancy report to be generated. (The \$2,400 is

based on the requirement that tenants must report to the O/A when the family's income cumulatively increases by \$200 or more per month – see Paragraph 7-10.A and the HUD Model Leases in Appendix 4 of Handbook 4350.3 REV-1.)

For example, if the projected income for a household was \$10,000 but the actual income was \$14,000, the difference of \$4,000 is greater than the established cutoff value of \$2,400, qualifying it to appear on the report. Conversely, if the projected income for a household was \$10,000 but the actual income was \$12,000, the difference of \$2,000 is less than that of the established cutoff value of \$2,400, disqualifying it from appearing on the report.

The Discrepancy Analysis section of the Income Discrepancy Report provides results of the income analysis process. It provides actual and annualized last quarter data. There is a column for each type of date – Actual and Annualized Last Quarter Data.

- **Reported Annual Wages and Benefits from EIV Data** – This field identifies the actual income reported to EIV for the designated period of Income for Discrepancy Analysis.
- **Amount of Annual Income Discrepancy** – This field identifies the value of the discrepancy in the annual income that caused the household to be included in the report data. Negative currency values are represented in parentheses. For example, -\$800 is represented as (\$800). When this value caused the household to be included on the report, it appears in a bold typeface.
- **Amount of Monthly Income Discrepancy** – This field identifies the value of the discrepancy in the monthly income that caused the household to be included in the report data. Negative currency values are represented in parentheses. For example, -\$800 is represented as (\$800). When this value causes the household to be included on the report, it appears in a bold typeface.
- **Percentage of Income Discrepancy** – This field identifies the percentage by which the threshold cutoff value has been exceeded for this household. Negative percentage values are represented in parentheses. For example, -75% is represented as (75%).

7. Report Generation

The Income Discrepancy Report data gathering and calculations are computed automatically on a weekly basis. The data is collected, analyzed, and stored in the EIV database according to the previously specified criteria. The obsolete data set is overwritten with the current data. Users relying on data from a particular Income Discrepancy Report are advised to print that report before it is overwritten.

*Saunders Example

Household Information:

Head of Household – Sandra L Saunders
Child – John Saunders

TRACS/form HUD-50059 Information:

Move-in certification effective 9/8/05

Income:
\$7,098 non-Federal wage
Total Tenant Payment/Tenant Rent \$166

Interim recertification effective 7/1/06

Income:
\$3,690 child support
Total Tenant Payment/Tenant Rent \$80

Interim recertification effective 9/1/06

Income:
\$3,690 child support
Total Tenant Payment/Tenant Rent \$80

Annual Recertification effective 9/1/07

Income:
\$3,105 child support
\$299 other non-wage source
Total Tenant Payment/Tenant Rent \$73

1. An Income Discrepancy Report was generated by EIV informing the owner/management agent (O/A) that this household possibly has unreported or underreported income that exceeds \$2,400 per year.

\$2,400 is used as the threshold for determining whether or not EIV will generate an Income Discrepancy Report. This is based on the reporting requirement whereby a tenant is to report changes in income when the family's income cumulatively increases by \$200 or more per month ($\$200 \times 12 = \$2,400$).

2. The O/A will obtain the form HUD-50059(s) in effect during the Period of Income for Discrepancy Analysis to determine the source of income, amount and type (wage, unemployment, SS, SSI) of income reported by the family.

In this example, the form HUD-50059(s) in effect would be for the period 6/1/06 through 5/31/07. During the first month of this period, the form HUD-50059 shows this tenant had wages, however, for the remainder of the period no wages were reported by the tenant.

3. The O/A will then obtain the income information reported from NDNH or SSA and compare it with what was reported in TRACS and on the form HUD-50059(s) and used as income for the period 6/1/06 through 5/31/07.

In this example, the NDNH data shows wage income from two sources that were not reported by the tenant.

4. The O/A must discuss this with the tenant, following the guidance in Chapter 8, Paragraph 8-18 of Handbook 4350.3 REV-1.
5. If the information for the related form HUD-50059(s) in the tenant file does not agree with the information transmitted to TRACS, the O/A must transmit, or the CA on behalf of the O/A, the information need to correct the TRACS database.

NOTE: The O/A should also refer to the guidance in the document “Resolving Income Discrepancies between Enterprise Income Verification (EIV) System Data and Tenant-Provided Income Information” posted on the Multifamily EIV website at:
<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>

* All information used in this example is fictional. This includes tenant names, company names, social security numbers, federal employer identification numbers (FEIN), project name, contract number, etc.

Summary Report

Head of Household Identifiers

Name:	SANDRA L SAUNDERS
Social Security Number:	***_**-0000
Date of Birth (mm/dd/yyyy):	XX/XX/1984
Contract Number:	LA06XXX4001
Project Number:	
Project:	JACKS APTS
Unit Address:	630 N 10 TH AVE APT 201 SHREVEPORT LL 536XX
Next Re-certification Date:	09/01/2008
Tenant Data from Form 50059 as of:	09/11/2007
Most Recent Type of Action:	AR-Annual Recertification
Effective Date:	09/01/2007

Family Members

Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
***_**-0000	SANDRA	SAUNDERS	XX/XX/1984	24	Head of Household	Verified
***_**-0001	JOHN	SAUNDERS	XX/XX/2005	2	Child	Verified

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

Bottom of Form

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

Income Discrepancy Report

Head of Household Information		
Name:	SANDRA L SAUNDERS	
Social Security Number:	000-00-0000	
Contract Number:	LA06XXX4001	
Project Number:		
Project:	JACKS APTS	
Effective Date of Action:	09/01/2007	
Next Re-certification Date:	09/01/2008	
Projected Annual Wages and Benefits from Form HUD-50059:	\$3,404.00	
Period Of Income for Discrepancy Analysis	06/01/2006 - 05/31/2007	
Discrepancy Analysis	Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$14,042.79	\$17,055.64
Amount of Annual Income Discrepancy:	(\$10,638.79)	(\$13,651.64)
Amount of Monthly Income Discrepancy:	(\$886.57)	(\$1,137.64)
Percentage of Income Discrepancy:	(75.76%)	(80.04%)
<p>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.</p>		
<p>Confidential. Privacy Act Data. Civil and criminal penalties apply to misuse of this data.</p>		

INCOME REPORT

Wage and Benefit Report for Household of SANDRA L SAUNDERS

Contract Number: LA06XXX4001 **Subsidy Type** Section 8
Project: JACKS APTS **Project Number:**
Next Re-certification Date: 09/01/2008 **Form 50059 as of:** 09/11/2007
Address: 630 N 10TH AVE APT 201 01 0201 SHREVEPORT LL 536XX
Most Recent Type of Action: AR-Annual Recertification **Effective Date:** 09/01/2007

Head of Household: SANDRA L SAUNDERS

Social Security Number: ***-**-0000 **Date of Birth:** XX/XX/1984

* The difference between the gross and net benefit may include the Medicare premium and/or additional deductions, such as garnishments, which are not listed on this report.

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

Family Member: SANDRA L SAUNDERS **SSN:** ***-**-0000
Date of Birth: XX/XX/1984 **Relationship:** Head of Household

Employment Information

Hire Date	Hire State	FEIN	Employer Name and Address	Date Received by EIV
01/16/2007	IA	42-0000000	KKC LC 64 WESTOWN PKWY, W SHREVEPORT LL 522XX-7709	01/18/2008
06/08/2006	IA	42-0000001	ADXXX CO AUDITOR 10 BENTON AVE E, PO BOX 8, SHREVEPORT LL 522XX-0000	01/18/2008

Wages

Pay Period	Amount	FEIN	Employer Name and Address	Date Received by EIV
Q3 of 2007	\$629.00	42-0000002	"KKC LC PO BOX 283, SAINT LOUIS MD 631XX-0283	02/16/2008
Q3 of 2007	\$3,508.00	42-0000001	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LL 522XX-0008	02/16/2008

Q2 of 2007	\$525.00	42-0000002	KKC & SEE LC PO BOX 283, SAINT LOUIS MD 631XX-0283	01/18/2008
Q2 of 2007	\$4,076.00	42-0000000	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LI 522XX-0008	01/18/2008
Q1 of 2007	\$801.00	42-0000002	KKC & SEE LC PO BOX 283, SAINT LOUIS MD 631XX-0283	01/18/2008
Q1 of 2007	\$2,624.00	42-0000000	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LL 522XX-0008	01/18/2008
Q4 of 2006	\$3,664.00	42-0000000	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LL 522XX-0008	01/18/2008
Q3 of 2006	\$3,324.00	42-0000000	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LL 522XX-0008	01/18/2008
Q2 of 2006	\$1,207.00	42-0000003	J SHARE INC 2723 PLEASANT ST, PLEASANT LL 522XX-2137	01/18/2008
Q2 of 2006	\$448.00	42-0000000	ADXXX CO AUDITOR PO BOX 8, SHREVEPORT LL 522XX-0008	01/18/2008
Q1 of 2006	\$2,999.00	42-0000003	J SHARE INC 2723 PLEASANT ST, PLEASANT LL 522XX-2137	01/18/2008
Q4 of 2005	\$2,148.00	42-0000003	J SHARE INC 2723 PLEASANT ST, PLEASANT LL 522XX-2137	01/18/2008

Unemployment Benefits

EIV received no benefit data.

Social Security Benefits

EIV received no benefit data.

Dual Entitlement

EIV received no benefit data.

Medicare Data

EIV received no benefit data.

Supplemental Security Benefits

EIV received no benefit data.

Attachment 5: Using EIV Data Flow Chart

