

Exhibit 3-4 Policy Overview

Old Policy	New Policy
Exhibit 3-4 Up-front Verification	Enterprise Income Verification – this includes parts of former Exhibit 3-8
A. Verification of Eligible Noncitizens	In Exhibit 2-3
B. Alaska Permanent Fund Dividends	In the Administrative Desk Manual
C. The Work Number for Everyone	--
D. Social Security	In Exhibit 3-5
E. EIS/DOL	In the Administrative Desk Manual
F. Military Pay	In Exhibit 3-1
G. Sex Offender Database	In the Administrative Desk Manual
H. Alaska Community Database	In the Administrative Desk Manual
I. Child Care Deductions	In Exhibit 3-2
J. Ingens Instructions	In the Administrative Desk Manual
--	Trial Court instructions, in the Administrative Desk Manual

Forms

HUD-9886 Authorization for the Release of Information/Privacy Act Notice
 HUD-9887 Authorization for the Release of Information/Privacy Act Notice
 VF200EIV Authorization for the Release of Information/Privacy Act Notice

Administrative Desk Manual

Alaska Permanent Fund Dividend – Verification of Receipt
 Alaska Trial Court Records
 EIV for Applicants
 Enterprise Income Verification (EIV) - Registration, Training, Monitoring Resources
 Sex Offender Registry Checks

Exhibit 3-4

Enterprise Income Verification

The U.S. Department of Housing and Urban Development (HUD) gathers data from electronically submitted 50058 and 50059 forms from each housing authority. That data is placed into HUD's Enterprise Income Verification (EIV) System. When a family signs a HUD-9886, HUD-9887, or VF200EIV, the family agrees to allow HUD to match income data from their 50058 against the following national databases:

- The Social Security Administration (SSA)
- The U.S. Department of Health and Human Services (HHS)

Data from these systems is used as follows:

- SSA provides HUD with death, Social Security (SS) and Supplemental Security Income (SSI) information.
- HHS provides HUD with wage and employment information as reported by employers and unemployment compensation information as reported by the State Workforce Agency (SWA).

3-4.1 REGISTRATION AND TRAINING

See the Administrative Desk Manual, EIV Registration, Training, Monitoring, for monitoring requirements.

3-4.2 DATA MONITORING

To ensure that housing authorities are checking its data, HUD mandates the use of several reports (PIH Notice 2010-19). See the Administrative Desk Manual, EIV Registration, Training, Monitoring, for monitoring requirements.

3-4.3 CONFIDENTIALITY

Each individual's EIV information is confidential and may not be shared with other family members without their permission. Staff will only show an individual the EIV information pertaining to that individual. The head of household will receive the EIV information relating to any minors in the household.

3-4.4 WHEN TO PULL AN EIV

Any time staff performs an income examination, staff must pull an EIV report.

3-4.4.A New Admission

The EIV report is pulled after admission to the program. HUD requires that the report be pulled within 120 days of the 50058 new admission date. To ensure that staff meets this deadline, Central Office will send a reminder to staff when the 50058s have been submitted for each time period. Central Office will remind staff to begin checking for the new admission EIV.

See Discrepancies section below for discrepancies over \$2,400.

3-4.4.B Regular Examination

The EIV report is pulled prior to the examination due date to compare to the family's reported income. Utilizing the HUD hierarchy, staff will verify family income as follows:

- Staff will pull the EIV report.
- Staff will compare family hand-carried information to the EIV report.
- If family agrees with EIV report, staff will use the hand-carried information to compute annual income.

Example: Verification Scenarios

1. The EIV report lists wages that Tim Tam earned at Target. He agrees that he works at Target and submits pay stubs for the last six pay periods. Staff calculates anticipated wages using the pay stubs.
2. The EIV report shows that Tim Tam's elderly father receives \$600 per month from social security as of the previous October. Tim Tam submits his SSA letter showing that Tim Tam's father received an increase to \$620 as of January. Staff will accept the SSA letter and calculate annual income using the \$620 per month.
3. At the last examination, Tim Tam received TANF of \$100 per month. Staff will pull a report from EIS to verify monthly payments.

See Discrepancies section below for discrepancies over \$2,400.

3-4.4.C Interim Examination

The EIV report is pulled after the interim examination is completed. Although the client's most current income situation will not be reflected, it is reference to the client's past reporting.

See Discrepancies section below for discrepancies over \$2,400.

3-4.5 DISCREPANCIES

HUD characterizes a substantial difference as \$200 or more per month in income. Staff will address any discrepancies of \$2,400 or more per year. A resolution does not necessarily mean that a discrepancy will no longer appear on subsequent EIV reports; however, staff is required to identify and document how the discrepancy was handled.

1. Regular Examinations – Discrepancies must be resolved prior to the examination effective date.
2. New Admission or Interim Examination – Discrepancies must be resolved within 60 days of the EIV pull date.

Staff will compare the EIV report to a family's hand-carried documentation as the first step in the verification process.

Example: UIV Different from SSI/SSA Award Letter

In cases where the UIV reflects a difference from the SSI/SSA award letter, use the documentation brought by the family with a note explaining why.

1. A cost of living adjustment in January is not reflected on the EIV report when the family is interviewed in March.
2. A new family's income is not yet reflected in the EIV report.

3-4.5.A No Substantial Difference

In cases where UIV income data is not substantially different (under \$200 per month) than tenant reported income, follow the procedure below.

1. If UIV income data is less than current family-provided documentation, use the family-provided documents to calculate anticipated annual income.
2. If UIV income data is greater than family-provided documentation, use the UIV income data to calculate anticipated annual income unless the family provides documentation of a change in circumstance; i.e., change in employment, reduction in hours, etc.
3. If the family produces acceptable documentation of a change in circumstances, use the family-provided documents to calculate anticipated annual income.

3-4.5.B Substantial Difference

In cases where EIV/UIV income data is substantially different (\$200 or more per month) than tenant-reported income, follow the procedure below.

1. Request written, third-party verification from the discrepant income source, in accordance with 24 CFR 5.236 and this chapter.
2. Review historical income data for patterns of employment, paid benefits, and/or receipt of other income, when income cannot be readily anticipated, such as in cases of seasonal employment, unstable working hours, and suspected fraud.
3. The most current verified income data (including historical data if appropriate) is used to calculate anticipated income.
4. Assess all data (UIV, third-party verification, and other documents/ information provided by the family) and attempt to resolve the income discrepancy. Document in the file the type of verification used and the reason why it was selected over others.