

Swansea Housing Authority
EIV Policies and Procedures
As they Relate to Federal Family Housing

Earned Income Verification (EIV) and all of its reports must be used in accordance with HUD's most recent Housing Notice.

The Swansea Housing Authority shall implement the EIV Income Report as a third party verification of employment and income. Likewise, other EIV reports such as, but not limited to, Income Discrepancy Reports and Verification Reports shall be used in timely fashions as directed by HUD in conducting annual re-certifications and any interim certifications as deemed necessary. They may also be used as a means of clarification of income or family composition if the need arises.

The following reports shall be run by the Dartmouth Housing Authority:

- Income Discrepancy
- New Hire
- No Income
- Multiple Subsidy Identity Verification
- Failed Verification
- Deceased Tenant

INCOME DISCREPANCY REPORT: Identifies households where there is a difference of \$2,400 or more annually in the wages, unemployment compensation and/or Social Security benefit income reported by NDNH and SSA and the wages, unemployment compensation and/or Social Security benefit reported in TRACS.

- SHA must print the IDR at the same time they print the Income Report, at annual and interim recertification or at any other time necessary.
- SHA must review and resolve any discrepancies with the household at the time of recertification or within 30 days of the EIV Income Report date.
- SHA must retain the IDR along with the detailed information on the resolution in the tenant file.

NEW HIRE REPORT: Identifies tenants who have started new jobs within the last six months.

- SHA must use this report at least quarterly to determine if any tenant has started new employment and if they have reported a change in income.

NO INCOME: Identifies 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.

- SHA must use this report only as identified and must run it quarterly.

MULTIPLE SUBSIDY IDENTITY VERIFICATION: Identifies individuals who may be receiving multiple rental subsidies.

- SHA must use the MSR at least quarterly to identify any tenants who are being assisted at another location.

FAILED VERIFICATION: Identifies household members who failed the SSA identity test because their personal identifiers do not match SSA's records.

- SHA must use this report monthly to identify those tenants that did not pass the SSA identity verification test and the reason why so that the errors can be corrected.

DECEASED TENANT REPORT: Identifies tenants who are participating in a rental assistance program who are reported by SSA as being deceased.

- SHA must use this report at least quarterly to identify those tenants reported as being deceased and confirm in writing whether the information is correct or not.

The Income Reports in **EIV** contain the SSNs, full days of birth, first and last names, and physical address of tenant families. This is all very personal information that **must not** be handled carelessly. Therefore, *the Swansea Housing Authority* realizes that it must be careful not to share this information with anyone who is not authorized to have it.

Privacy Act of 1974 ...552a (a) Definitions for purposes of this section— (1) the term “agency” means agency as defined in section 552(f) of this title; (2) the term “individual” means citizen of the United States or an alien lawfully admitted for residence; (3) the term “maintain” includes maintain, collect, use or disseminate; (4) the term “record” means any item, collection or grouping of information.

EIV Data may only be disclosed to:

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

EIV Unauthorized Disclosure

- Must not disclose data in any way that would violate the privacy of the individuals
- EIV Data must not be disclosed (or re-disclosed) to any third parties

Sanctions

- Willful disclosure or inspection of EIV Data can result in civil and criminal penalties

Unauthorized disclosure – felony conviction and fine up to \$5000.00 and/or imprisonment up to five (5) years, as well as civil damages

Unauthorized inspection – misdemeanor penalty of up to \$1000.00 and/or imprisonment, as well as civil damages

Tenant’s Right to Dispute EIV Data

- You must permit individual to have access to information pertaining to them and to request information be amended
- You must independently verify disputed information
 1. Tenant must be notified of findings
 2. Management cannot suspend, terminate, reduce or make a final denial of assistance or tenancy until tenant has opportunity to dispute and discuss

EIV COORDINATOR AND USERS

All staff using or having access to any portions of the EIV System shall adhere to the Rules of Behavior and shall take part in security training on an annual basis.

Before accessing the **EIV System**, all employee users must acknowledge, each time that they sign on, that they understand:

- The conditions of the of the Privacy Act
- They may have access to EIV for official purposes only
- They are subject to civil and/or criminal penalties under the Privacy Act of misuse of information
- There must be a signed consent form (HUD 9887 & 9887A) on file before viewing income data from the individual (every family member 18 or older, whether they have income or not must sign these forms)
- The signed HUD 9887 & 9887A must not be older than 15 months

When signing the CAAF (Coordinator Access Authorization Form) or the UAAF (User Access Authorization Form), EIV users agree to:

1. The Rules of Behavior
 - Delineates responsibilities of, and expectations for, individuals with access to the EIV system, which hold users accountable for their actions and responsibilities
 - Enhances other HUD policies already in place

Safeguard Categories

- Technical
 1. Must have a valid WASS User ID and password
IDs and Passwords must not be shared;
Must not access system using another's ID!!!!
 2. Must provide Management with application access authorization form
*Access to data is restricted based on **EIV** role (Coordinator or User);*
Access limited based on need to know
 3. Access and activity will be monitored and audited by Management
***EIV** Coordinators must be certified annually;*
***EIV** Users must be certified quarterly (if not certified within 30 days after the end of the current quarter, access to **EIV** is terminated)*

- **Administrative Safeguards**
 1. These are the standard operating procedures for use of data from **EIV**
Use employment and income data for processing HUD 50059s only;
***Do Not** share data with others who do not have a "need to know";*
Check to see if the applicant/tenant is receiving assistance under another program at a different location;
Owner approval letters must be on file for each "Coordinator" or "User" and be current;
*Periodically (quarterly) review the list of "Users" at each site to see if "User" still has a valid need to access the **EIV** data for that site or project;*
Modify or revoke rights as appropriate;
 2. Assign Access to ensure that access rights and responsibilities are appropriate

3. Tenant Consent Form on file
4. Destroy EIV information that is no longer needed in accordance with HUD Handbook 4350.3 requirements – shred, burn or pulverize

Social Security Benefit (SSA) Reports are to be kept for the term of the tenancy plus (3) three years after tenancy is terminated; NDNH Reports (National Directory of New Hires) from EIV (either electronic or paper) may only be retained for 2 years. Then the information must be destroyed if it contains new hire, wage or unemployment compensation benefit data however any tenant provided documentation, or other third party verification of income, received to supplement the NDNH data must be retained in the tenant file for the term of the tenancy plus three (3) years after tenancy terminated.;

If SSA & NDNH benefits are combined in a single report, the retention requirements for NDNH data reports apply;

Management will make a notation in the tenant file when NDNH data is destroyed. The notation should state that “the NDNH employment and income information obtained from the EIV system was used for verification of the employment source and, if applicable, for determining the tenant’s income from wages and/or unemployment compensation as well as the date the information was destroyed.

5. Conduct training to ensure that all EIV users receive security training at time of implementation or employment and at least annually thereafter and maintain a record of such training. Communicate security information through the use of posters, security bulletins, discussion groups and distribution of all current EIV information and memos.
6. Detect, deter and report improper disclosures, unauthorized access or security breaches to Supervisor and/or Management.

Physical Safeguards

1. Designate secure areas by restricting the use of printers, copiers, facsimile machines and maintain controlled access to the areas where they are kept.
2. Secure computer systems and output by storing downloaded **EIV** data in a separate, restricted directory, label CDs containing **EIV** data “confidential: or “For official use only”.
3. Lock in a secure place.
4. Make sure that the computer screen is not visible by any unauthorized persons.
5. Do not use a computer in the reception area for **EIV** reports. If you have to do this, reposition your desk or computer to keep the material confidential.
6. Retrieve all computer printouts as soon as they are generated, so that **EIV** data is not left unattended.
7. Printouts should not be removed from the premises to prevent any identity theft.
8. Avoid leaving a computer unattended with **EIV** data displayed on the screen. Lock your computer/Log off/Exit the system when you are leaving your desk or when finished for the day. **EIV** will time-out after 30 minutes of inactivity.
9. The fastest and safest way to log out or “close” **EIV** and WASS is to click on the “X” in the upper right corner of the screen while in **EIV**.

I, _____ agree to follow the above policy and procedures of Swansea Housing Authority in the use and access to the **EIV System**.

Employee’s Signature

Date

Supervisor/Owner’s Signature

Date