

The EIV Master Files

In July 2010, HUD released HUD Notice 10-10 as a guide for owner/agents using HUD's Enterprise Income Verification System.

In addition to assisting with the employment and verification process, EIV can be used to monitor compliance of existing residents. Owner/agents are required to periodically view certain reports. This "Master File" must include the following Reports:

- Identity Verification Reports – Monthly
- Deceased Tenant – At least quarterly and as indicated in the property's EIV policies
- New Hires Report – At least quarterly and as indicated in the property's EIV policies
- Multiple Occupancy Report – At least quarterly and as indicated in the property's EIV policies

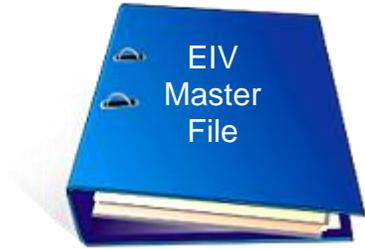
Regular review of these reports helps reduce "assistance paid in error". Owner/agents are required to make sure that:

1. Data recorded in TRACS is correct
2. Information provided by residents is correct
3. Residents are complying with reporting requirements

In our opinion, it is good practice to produce these during the first 10 days of the month corresponding with the TRACS file transmission, but owner/agents must establish their own policies. The EIV Master File can be set up as an actual file or in a binder or set of binders. There is a standard process for maintaining the property EIV Master File. First, decide how you will run the reports. When you set up the Master File, have a tab or file for each report.

The Master File must be kept secure in the same manner that resident files are kept secure. The EIV Master File must be maintained for three years. Owner/agents must document the file when EIV records are destroyed

It is important to understand what information is maintained in the Master File and what information is maintained in the resident file. the Master File is not intended to serve as a resource for documenting detailed actions. EIV Master Files should provide a tool to ensure that resident compliance is reviewed periodically. The owner/agent should make notes on the reports in the master file, but copies of notices, verification documents, new certifications, etc. are maintained in the resident files.



EIV MASTER FILES

Identity Verification Reports

The Identity Verification Report includes summary information about residents living in the community. Discrepancies are indicated on one of two reports 1)The Failed Pre-Screening Report and 2) The Failed Verification Report. Both of these reports must be reviewed every month.

Failed Pre-Screening Report

Failed Pre-Screening Reports must be run every month and the report must be maintained in the property's EIV Master File for three years. This report displays residents whose SSA information provided on HUD Form 50059 failed some level of edit.

Usually, these errors are caused by data entry errors or situations that you already know about.

Documenting the EIV Master File & the Resident File – Failed Pre-Screening

The EIV Master File Pre-Screening Report is maintained as follows:

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| ✓ | If the error has already been reviewed and a correction certification has been submitted to TRACS, check TRACS to make sure that the correction has been received. This must be noted. |
| ✓ | If the error is created because the household member is exempt from providing a Social Security Number, that must be noted |
| ✓ | If the error is returned as a result of a “previously known” situation, such as a previously identified error with the Social Security Administration, that must be noted |
| ✓ | If there is a discrepancy that cannot be readily explained by reviewing the resident file, that must be noted and the resident must be contacted |

If the owner/agent must contact the resident based on information discovered when reviewing the EIV Failed Pre-Screening Report, **the resident file** contains

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| ✓ | A copy of the Failed Pre-Screening Report reflecting the discrepancy (The resident file may only include information about members of that household) |
| ✓ | If the error was caused by a data entry error, the signed corrected certification must be in the resident file |
| ✓ | All correspondence with the resident |
| ✓ | If the data in EIV is incorrect, notify the resident that he/she should contact SSA |
| ✓ | If the resident provided incorrect information <ul style="list-style-type: none">• Notice of Material Lease Violation• Correction certification• New Verification (if appropriate)• Repayment agreement (if appropriate)• Notice of termination of tenancy (if appropriate) |

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EIV MASTER FILES

The Failed Verification Report

The personal identifiers are matched against SSA's records for each active resident in TRACS. For those residents that **fail** the identity match against SSA's records:

- No employment or income information will be provided by SSA or HHS
- SSA will provide information on why the verification failed

In many cases, failed pre-screening and failed verification discrepancies are caused by data entry errors.

Documenting the EIV Master File & the Resident File – Failed Verification

The EIV Master File Failed Verification Report is maintained as follows:

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| ✓ If the error has already been reviewed and a correction certification has been submitted to TRACS, check TRACS to make sure that the correction has been received. This must be noted. |
| ✓ If the error is created because the household member is exempt from providing a Social Security Number, that must be noted |
| ✓ If the error is returned as a result of a "previously known" situation, such as a previously identified error with the Social Security Administration, that must be noted |
| ✓ If there is a discrepancy that cannot be readily explained by reviewing the resident file, that must be noted and the resident must be contacted |

If the owner/agent must contact the resident based on information discovered when reviewing the EIV Failed Verification Report, **the resident file** contains:

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| ✓ A copy of the Failed Verification Report reflecting the discrepancy (The resident file may only include information about members of that household) |
| ✓ If the error was caused by a data entry error, the signed corrected certification must be in the resident file |
| ✓ All correspondence with the resident |
| ✓ If the data in EIV is incorrect, notify the resident that he/she should contact SSA |
| ✓ If the resident provided incorrect information <ul style="list-style-type: none">• Notice of Material Lease Violation• Correction certification• New Verification (if appropriate)• Repayment agreement (if appropriate)• Notice of termination of tenancy (if appropriate) |

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EIV MASTER FILES

Deceased Tenant Report

This report identifies residents who are currently reflected in TRACS as existing/active residents and who have been identified by SSA as deceased. The Deceased Tenants Report is updated every weekend.

Owner/agents are required to review this report at least quarterly. This report must be maintained in the EIV Master File for 3 years.

After the April 2011 release, this report should not display information for a resident who has passed away when the move out or interim certification has been successfully recorded in TRACS.

In most cases, there is a timing issue. If the MO or IR has been sent to TRACS, check TRACS to make sure the transaction has been recorded correctly. If the transaction has been recorded in TRACS, make a note in the EIV Master File. If a family failed to notify you about the death of your resident, you will need to verify the date of death and recalculated the assistance.

Documenting the EIV Master File & the Resident File – Deceased Tenant Report

The EIV Master File Deceased Tenant Report is maintained as follows:

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| ✓ | If the error has already been reviewed and a correction certification has been submitted to TRACS, check TRACS to make sure that the correction has been received. This must be noted. |
| ✓ | If the error has already been reviewed the MO or IR has been submitted to TRACS, check TRACS to make sure that the MO/IR has been received. If so, that must be noted |
| ✓ | If the error is returned as a result of a “false hit” or a “previously known” situation, such as a previously identified error with the Social Security Administration, that must be noted |
| ✓ | If there is a discrepancy that cannot be readily explained by reviewing the resident file, that must be noted and the resident must be contacted |

If the owner/agent must contact the resident based on information discovered when reviewing the EIV Deceased Tenant Report, **the resident file** contains

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| ✓ | A copy of the Deceased Tenant Report reflecting the discrepancy (The resident file may only include information about members of that household) |
| ✓ | If the error was caused by a data entry error, the signed corrected certification must be in the resident file |
| ✓ | All correspondence with the resident |
| ✓ | If the data in EIV is incorrect, notify the resident that he/she should contact SSA |
| ✓ | If SSA benefits have been suspended, may need to implement hardship exemption to reduce rent. Corresponding verification and certification must be included in the file. |
| ✓ | Once situations is resolved, create IR to reinstate the appropriate assistance. |
| ✓ | If the resident provided incorrect information <ul style="list-style-type: none">• Notice of Material Lease Violation• Correction certification• New Verification (if appropriate)• Repayment agreement (if appropriate)• Notice of termination of tenancy (if appropriate) |

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EIV MASTER FILES

Multiple Occupancy Report



This report identifies residents who live on your property who appear to be receiving HUD assistance in multiple places. Owner/agents must review the Multiple Subsidy Report at least quarterly and must be retained for 3 years. When reviewing this report, owner/agents must perform both of the search options to determine if possible multiple subsidies exist.

- Multi-Family
- Public & Indian Housing (vouchers)

Documenting the EIV Master File & the Resident File – Multiple Occupancy Report

The EIV Master File Multiple Occupancy Report is maintained as follows:

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| ✓ If the error has already been reviewed and a correction certification has been submitted to TRACS, check TRACS to make sure that the correction has been received. This must be noted. |
| ✓ If the error is caused by a situation where dual subsidy is acceptable (minor in a joint custody arrangement or a household “split”) that must be noted |
| ✓ If the error is returned as a result of a “false hit” or “previously known” situation, such as a problem with the previous owner/agent’s MO transaction, that must be noted |
| ✓ If there is a discrepancy that cannot be readily explained by reviewing the resident file, that must be noted and the resident must be contacted |

If the owner/agent must contact the resident based on information discovered when reviewing the EIV Multiple Occupancy Report, **the resident file** contains

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| ✓ A copy of the Multiple Occupancy Report reflecting the discrepancy (The resident file may only include information about members of that household) |
| ✓ If the error was caused by a data entry error, the signed corrected certification must be in the resident file |
| ✓ All correspondence with the resident |
| ✓ If the resident claims the data in EIV is incorrect <ul style="list-style-type: none">• Verify the information with the owner/agent noted in EIV. If the former landlord will not respond<ul style="list-style-type: none">○ Note the file explaining why third party verification was not obtained○ Attempt review of documents○ Accept notarized self-certification• Notify the resident that he/she should contact the former landlord, the CA (if applicable) or HUD• Notify the resident to protect him/herself from identity theft |
| ✓ If the resident provided incorrect information or is living in another HUD property <ul style="list-style-type: none">• Notice of Material Lease Violation• Verification• Correction certification if appropriate (Termination/IC)• Repayment agreement (if appropriate)• Notice of termination of tenancy (if appropriate) |

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EIV MASTER FILES

New Hires Report

This report provides employment information for residents who may have started new jobs within the last 180 days. The information in this report is updated monthly. This report **MUST** be reviewed at least quarterly and maintained in the EIV Master File. Discrepancies must be investigated and resolved if possible.

Documenting the EIV Master File & the Resident File – New Hires Report

The EIV Master File New Hires Report is maintained as follows:

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| ✓ | If the error has already been reviewed and a correction certification has been submitted to TRACS, check TRACS to make sure that the correction has been received. This must be noted. |
| ✓ | If the resident reported the new job and no new certification is required, that must be noted |
| ✓ | If the error is returned as a result of a “previously known” situation, such as a problem with the employer’s records that has already been investigated, that must be noted |
| ✓ | If there is a discrepancy that cannot be readily explained by reviewing the resident file, that must be noted and the resident must be contacted by Notice in accordance with HH 4350.3 Revision 1, Change 3, Paragraph 7-12 |

If the owner/agent must contact the resident based on information discovered when reviewing the EIV Multiple Occupancy Report, **the resident file** contains

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| ✓ | A copy of the New Hires Report reflecting the undisclosed new job (The resident file may only include information about members of that household) |
| ✓ | All correspondence with the resident |
| ✓ | <ul style="list-style-type: none">✓ If the resident claims the data in EIV is incorrect<ul style="list-style-type: none">• Verify the information with the employer noted in EIV. If the employer will not respond<ul style="list-style-type: none">○ Note the file explaining why third party verification was not obtained○ Attempt review of documents○ Accept notarized self-certification• Notify the resident that he/she should contact the employer listed in EIV and obtain a copy of such correspondence if possible• Notify the resident to protect him/herself from identity theft |
| ✓ | <ul style="list-style-type: none">✓ If the resident provided incorrect information or failed to notify the owner/agent of a change<ul style="list-style-type: none">• Notice of Material Lease Violation• If the resident agrees with new employment information, obtain documents to determine income (pay stubs)• If the resident does not agree with new employment information Verify the information with the employer noted in EIV If the employer will not respond<ul style="list-style-type: none">○ Note the file explaining why third party verification was not obtained○ Attempt review of documents○ Accept notarized self-certification• Correction certification if appropriate or new certification if appropriate• Repayment agreement (if appropriate)• Notice of termination of tenancy (if appropriate) |

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