

Finding HCV17a

EIV Standard Operating Procedure

In this finding, please find the following:

- a. EIV standard operating procedure
 - i. DCHA has established and implemented EIV Standard Operating Procedures.



REFERENCE DOCUMENT FOR EIV POLICY AND PROCEDURE

Regulatory Reference: 24 CFR 5.233

DCMR: Chapter 14– 54

The EIV system is a web-based application which provides DCHA with employment, wage, unemployment compensation and Social Security benefit information for all Housing Choice Voucher Program (HCVP) participants (federal only). Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS) for all program participants with valid personal identifying information (name, date of birth (DOB), and social security numbers (SSN)) reported on the form HUD-50058. Information in the EIV system is used by DCHA to verify employment and income at the time of recertification and to reduce errors in subsidy payments.

It is mandatory that DCHA uses the EIV system during the application process and at every interim/biennial/triennial recertification.

EIV POLICY STANDARD OPERATION PROCEDURE

**PROCESS: NEW USER REGISTRATION
POSITION: HCVP NEW HIRES**

Step 1: Registration

1. As a new hire without prior EIV access, staff must complete the PHA User Registration form accessible from HUD's website below:
https://hudapps.hud.gov/public/wass/public/pha/phareg_page.jsp
2. Staff must review the EIV training webcasts videos located below:
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/uivsystem/piheivwebcasts
3. Staff must complete the online Security Awareness Training, receive the certificate, print/sign the certificate and email a copy to the ITD office.
https://www.hud.gov/sites/dfiles/PIH/documents/EIV_Annual_Security_Awareness_Training.pdf
4. Staff must complete the Enterprise Income Verification (EIV) System User Access Authorization Form and Rules of Behavior and User Agreement form to include the HUD account information received in Step 1.



***On an annual basis, all EIV users must complete the online Security Awareness Training, print/sign the certificate and forward a copy to ITD.

PROCESS: ELIGIBILITY

POSITION: ELIGIBILITY SPECIALIST

Step 1: Generate Existing and Former Tenant Search

For all applicants in eligibility, staff must generate an existing AND former tenant search in EIV for ALL household members.

- 1.1. The Eligibility specialist must use the household member's social security number to generate both existing and former tenant search. If search results in no data file, print the results and scan with application file.
- 1.2. If the existing search results in a data match, the eligibility specialist must notify the applicant to coordinate with the other location a move out date. The specialist must notate the file that there is an existing tenant match.
- 1.3. If the former tenant search results in a debt owed, the specialist must notify the applicant and request verification of the debt cleared or move forward with the denial of assistance process. Any other adverse results must be reviewed.

PROCESS: RECERTIFICATIONS

POSITION: HOUSING PROGRAM SPECIALIST (HPS)

Step 1: Generate EIV report

An EIV report must be generated for all federal recertifications including interims, biennial and triennial recertifications.

- 1.1 Upon receipt of a recertification packet, the Housing Program Specialist (HPS) must generate an EIV report for review of income. The verification hierarchy must be updated in Yardi for each income type that exists in the household.
- 1.2 If there is an income discrepancy report, the HPS must review and resolve the discrepancy with the household within 30 days of the report date. Any verification documentation to support the discrepancy whether valid or invalid must be maintained with the file.
- 1.3 If the discrepancy is VALID and supporting documentation is verified, the HPS must submit a repayment agreement request to the Quality Assurance Division.

PROCESS: OTHER EIV REPORTS

POSITION: QUALITY ASSURANCE/HOUSING PROGRAMS SUPERVISORS

Step 1: Generate other EIV reports



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On a monthly basis, the QA Housing Program Coordinator will generate the other EIV reports by the 1st business day of the month. The other EIV reports include Multiple Subsidy, Deceased Tenant, Immigration Report, SSA Deficiencies, New Hires, and New Admissions (not in EIV).

- 1.1 The QA HPC must generate all available EIV reports to be compiled into one spreadsheet by the 1st business day of each month. The QA HPC must generate a new admissions report from Yardi using the 60 day period prior to the month of the report (ex. For January's EIV report, generate a new admission for the period November 1-30).
- 1.2 The QA HPC must forward the compiled report to the QA Manager.
- 1.3 The QA manager will forward the monthly EIV report to the Housing Programs Supervisors with a due date in 15 business days.

Step 2: Review of monthly EIV reports

Multiple Subsidy- this report is used to identify individuals who may be receiving multiple subsidies.

1. Staff must review each entry to determine if a multiple subsidy exists.
2. Generate a multiple subsidy notice to be mailed to the head of household to address the discrepancy by providing verification that the multiple subsidies do not exist.
3. If needed, process the appropriate 50058 action to resolve the discrepancy.
4. If needed, the HPS may need to request a recommendation for termination if the household does not provide verification to clear the discrepancy.

Deceased Tenant- this report provides information of any current participant who is listed as deceased with the Social Security Administration.

1. Staff must review each entry of the deceased tenant report. Generate an EIV report to confirm the date of death if available.
2. For single member households, contact the landlord to confirm if the landlord is aware of the deceased tenant.
3. Process an End of Participation (EOP) 50058 effective the end of the month the HOH was deceased. Process the move out in Yardi.
4. Generate a contract termination notice and mail/email to the landlord.
5. Add notes to the participant file.
6. For deceased members that are not the HOH, generate a deceased with remaining household members notice to be sent to the HOH requesting the completion of an interim for household composition change.
7. Upon receipt of the interim, verify any additional changes. Remove the deceased member and process the interim. All required notices must be sent to the HOH and landlord.
8. For deceased HOH with remaining household members, generate the applicable deceased noticed to be mailed to the household and the landlord.



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9. Within 30 days, if no response has been received, process an EOP 50058 effective the end of the month following the date of the notice. Process the move out in Yardi.
10. Generate a contract termination notice and mail/email to the landlord.
11. Add notes to the participant file.

SSA Deficiencies/Failed Verification- this report shows household members with incorrect Social Security Numbers, date of birth, last name, as well as deceased household members.

1. Review the failed verification description provided on the report.
2. Review the permanent records in the participation file to verify the correct information applicable.
3. Make all required corrections in Yardi to the participants file. Process a correction to the most recent 50058 action that included the incorrect attribute.
4. Add notes to the participant file in reference to the correction(s) made.

New Hires- this report provides employment information for participants who have started new jobs within the last six months.

1. Staff should review each entry on the report and compare the report to the most recent recertification to processed to determine if the new hire information occurred within the most recertification period.
2. If a discrepancy in client reported information is identified, staff must contact the participant to confirm and request documentation.
3. If the participant disputes the new hire information, staff must request 3rd party income verifications. If the data is erroneous, staff should recommend that the participant contact the 3rd party who provided the information to make corrections to the system.
4. If the participant agrees with the new hire information that should have been reported with the most recent recertification, staff must notify the participant of the requirement to adjust the income information and enter into a repayment agreement.
5. Staff must document the participants Yardi record and add notes to the file.

New Admissions EIV- For each new admission 50058 action type, an EIV report must be generated and reviewed for income accuracy.

1. For each participant, staff must generate an EIV report.
2. Review the income report to confirm family reported income (if income is applicable to the report)
3. Print and maintain a copy of the EIV report in the participant file
4. Any income discrepancy must be resolved within 60 days of the EIV report date.
5. If the EIV report results in "no record found", staff must contact the QA HPC to confirm if a PIC error existed for the new admission 50058. The error must be resolved immediately.



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PROCESS: QUALITY CONTROL REVIEW

POSITION: QUALITY ASSURANCE

Upon receipt of the final report from the Housing Programs Supervisor, QA will randomly assign 2 reports to the Quality Control Coordinators to ensure that proper action has been completed by the Housing Programs staff. Any discrepancies in actions processed will be forwarded to the Housing Programs Manager for follow up.



**Office of Public and Indian Housing (PIH)
Enterprise Income Verification (EIV) System
User Access Authorization Form and
Rules of Behavior and User Agreement**

Paperwork Reduction Notice: 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(s) 2577-0267. 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. Public reporting burden for this collection of information is estimated to average 1.0 hour for initial responses and 0.25 hours for modified responses. This includes the time for collecting, reviewing, and reporting the data. The Federal Privacy Act (5 USC 552a) requires that HUD account for all individuals who will have access to a system containing personally identifiable information. The information is being collected to ensure only authorized users have access to HUD's EIV system and that those users are aware of their responsibility to safeguard sensitive data.

Purpose of this form: To request, modify, or terminate access to the PIH EIV system. To review and acknowledge Rules of Behavior and signify compliance with User Agreement.

Send completed forms: To the designated HUD EIV Coordinator at the local HUD office as listed in the instructions. **Note:** Individuals who will not access the EIV system, but will view and/or handle printed or electronic EIV information, are not required to send this completed form to the HUD EIV Coordinator.

PART I. ACCESS AUTHORIZATION

Check here if you will not have access to the EIV system and will only view or handle printed or electronic EIV information

A. Authorized User Details		
1. PHA Code: (e.g. DC451)	2. HUD Office, PHA, or Management Agent Name:	3. Address:
DC001	District of Columbia Housing Authority	1133 N. Capitol St NE Washington, DC 20002
4. Name (first name, middle initial, last name):		5. WASS User ID (C/H/M-ID):
6. Position Title:		7. Phone Number:
8. Email Address:		9. Fax Number:
10. Type of work which involves use of the EIV system or printed and/or electronic EIV information: 1 – Initial eligibility only 2 – Annual/interim reexams 3 – Security Administrator 4 – Request EIV access 5 – Certify EIV users 6 – Modify/terminate EIV access roles 7 – HUD Administrator 8 – Auditor 9 – Investigator/Program Compliance 10 – Enter/update/delete debts owed to PHAs & adverse termination information of former tenants 11 – Clerical/Administrative Support (Viewer or handler of EIV reports) – Do not complete sections BE.		

B. Type of Action Requested *(See instructions)*

- 1 – **Add Access** (Initial access request for new users)
- 2 – Reinstatement (Due to automatic system or other termination)
- 3 – **Modify Access** (Add/remove access roles for existing users)
- 4 – Terminate Access

C. PHA User Access Roles – External Users *(See instructions)*

1 – PHA Occupancy – Public Housing	5 – Program Administrator – Voucher (Section 8)
2 – PHA Occupancy – Voucher (Section 8)	6 – PHA User Administrator
3 – PHA Occupancy – Applications Processor	7 – PHA Security Administrator
4 – Program Administrator – Public Housing	8 – Other Prescribed by HUD

D. Public Housing Portfolio

Specify the Public Housing project numbers to which access will be limited.

Check here to grant access to all public housing projects

Project Number	Project Number	Project Number
1)	4)	7)
2)	5)	8)
3)	6)	9)

E. HUD User Access Roles – Internal Users *(See instructions)*

Select Region <i>(Check only one region)</i>	HHQ	HUB	FO	TARC
1 – Occupancy Specialist		5 – HQ PIH DHAP		
2 – Security Administrator		6 – HQ System Administrator		
3 – User Administrator		7 – HQ PIH Help Desk/TAC		
4 – HUD OIG		8 – Other Prescribed by HUD		

F. Authorization

As the Authorizing Official, I authorize the above-named person to have access to the EIV system or view printed or electronic EIV information, as indicated by my signature below. I further understand this form for each user must be maintained on-site by the PHA and may be subject to audit at any time.

Authorizing Official's Name
(Print Full Name)

Authorizing Official's Signature

Date

- Check here for **ELECTRONIC SIGNATURE** (Original signed document **must** be on file and is subject to inspection)

G. For HUD Use Only (Maintain a copy of this completed form in your files)

Date Application Received:

Date Application Processed:

HUD EIV Coordinator's Name:

Action taken: **Approved**
 Denied **Reason:**

PART II. RULES OF BEHAVIOR

A. Introduction

The U.S. Department of Housing and Urban Development (HUD) actively implements policies and procedures to keep its systems secure from unauthorized access and inappropriate use. In compliance with Federal laws and regulations, HUD's Office of Public and Indian Housing (PIH) created these Rules of Behavior for the Enterprise Income Verification (EIV) system to ensure that EIV system users (including those individuals who only view or handle printed or electronic EIV information) comply with HUD's security policies. In addition, this document ensures that system accounts are used in the appropriate manner.

Information contained in the EIV system is for official use only. HUD may grant limited system access to the following classes of individuals: HUD employees, HUD contractors, Public Housing Authority employees, and Public Housing Authority-hired management agents. As a condition of receiving access, all users are required to understand and abide by the HUD's system security policies and procedures.

All users must adhere to the Rules of Behavior outlined in this document. These rules delineate the responsibilities of and expectations for all individuals accessing EIV information. Failure to comply with these rules will result in sanctions. Sanctions may include temporary suspension of system access or permanent termination of all access rights. Additional civil or criminal penalties may result from a misuse of EIV information. (See Part III of this document for more information.)

B. Responsibilities

HUD-PIH, as the System Owner of EIV, is responsible for ensuring that appropriate technical, operational, and managerial security controls are implemented in the EIV system.

Users are responsible for the protection of passwords, information, equipment, systems, networks, and communication pathways to which they have access. All HUD computer resources, including hardware, software, programs, files, paper reports, and data are the sole property of HUD.

C. Other Policies and Procedures

The Rules of Behavior do not replace existing HUD security policies or procedures. These rules are intended to enhance and clarify the specific rules each user must follow while accessing the EIV system. These rules are consistent with the policies and procedures described in the following HUD document:

HUD Information Technology Security Policy. HUD Handbook 2400.25 Rev. 2, CHG 2, dated August 22, 2011, or as amended, establishes responsibilities, practices, and conditions that directly or indirectly promote security in the development, operation, maintenance, and support of all HUD information technology (IT) resources.

This handbook is available online at:

<http://www.hud.gov/offices/adm/hudclips/handbooks/admh/2400.25/index.cfm>. The HUD information security policies are based on recent federal laws, regulations, and guidance on information security (from National Institute of Standards and Technology (NIST)). In areas where federal guidelines are lacking or still evolving, the policy reflects established best security practices within the security community.

D. Application Rules

The Web Access Security System (WASS) user identification (user ID) and password issued to you is to be used solely in connection with the performance of your responsibilities in support of HUD's mission and administration of HUD rental assistance program, and may not be used for personal or private gain. You agree to be responsible for the confidentiality of the assigned information and accountable for all activity with your user ID. Furthermore, you agree that you will not provide this confidential user ID and password to another user during employment nor upon leaving the employment of the agency. Additional rules of the EIV system are as follows:

Required Training – EIV system users are required to participate in annual Security Awareness Training and HUD-sponsored initial and updated PIH-EIV System training. Individuals who will not access the EIV system, but will view and/or handle printed or electronic EIV information are required to participate in only the annual Security Awareness training. Free HUD-sponsored Security Awareness and EIV training is available online at <http://www.hud.gov/webcasts/archives/iv.cfm>. PIH-sponsored EIV training materials are located at <http://www.hud.gov/offices/pih/programs/ph/rhiip/training.cfm>. ***Users are not permitted to access the EIV system or view printed or electronic EIV information if they have not completed the required training.***

System Access (on-site only): Users are required to use only approved HUD software, software settings, and comply with vendor software license agreements. Users are allowed to access the system only using the mechanisms specified by HUD.

Unofficial use of government information: Users must be aware that personal use of information resources is prohibited. EIV data is personal information covered by the Federal Privacy Act (5 USC 552a), as amended, and penalties apply to the misuse of that data. State and local laws may also prohibit misuse of personal information and impose penalties for misuse of the data.

Information protection: Users must avoid leaving system output records or reports unattended or unsecured. Users should lock the computer or log out of the system when leaving work areas unattended. Users shall not violate the Federal Privacy Act (5 USC 552a), as amended, which requires confidentiality of personal data contained in government and contractor data files. Users should securely store EIV data in accordance with HUD policy.

Use of passwords: User passwords and user IDs are for your individual use only and are confidential HUD information. Users are required to change passwords every 30 days. Users are encouraged to avoid creating passwords that can be easily associated with you or your user ID.

System privileges: Users are given access to the system and EIV data based on a need to perform specific work related only to the administration of the following PIH programs: Public Housing, Housing Choice Voucher (HCV), Project-Based Voucher, Project-Based Certificate, and Disaster Housing Assistance programs. Users shall only access the information for which they are authorized.

Individual accountability: Users shall be held accountable for their actions while accessing the system or viewing printed or electronic EIV data. Be aware that all computer resources are monitored and audited.

Monitoring of EIV System Use: All users and agencies are subject to monitoring of their EIV system use and compliance with security requirements by HUD, HUD contractors or a third party. If it is determined that an agency or any of its users are not in compliance with security requirements or any provision of this document, HUD will immediately terminate one or all of an agency's users' EIV access. HUD will reinstate access upon the successful implementation of corrective action(s) to cure the deficiency.

Automatic EIV System Terminations: A user's EIV system access is automatically terminated if the user does not access HUD's Web Access Security Subsystem at least once every 90 days; or if the user is not certified by the respective EIV User Administrator.

Incident Response: Users should immediately contact their supervisor and the HUD Headquarters Security Officer at EIV help@HUD.GOV , with a copy to local HUD office, regarding any suspected violation or breach of system security.

PART III. USER AGREEMENT

I have read the above policy regarding system security awareness and practices when accessing HUD’s information technology resources. I understand the policies and procedures as set forth above, and I agree to comply with these requirements as a condition of being granted limited access to the EIV system and/or its data.

As an authorized user of the EIV system or viewer and/or handler of EIV data, I understand the information obtained may only be used for official HUD business. I understand that authorized users may access, disclose, inspect and use these data only within the scope of their official duties of administering a HUD rental assistance program. HUD employees are held to the highest level of responsibility and accountability for the protection of HUD data. HUD contractor firms will be expected to apply similar standards to their employees. Anyone who abuses EIV access privileges may be stripped of those and other access rights to HUD’s secure systems. Employees of an agency may be subject to personnel discipline consistent with applicable personnel rules. Contractor firms that do not assure that the Rules of Behavior are observed may be subject to remedies under the terms of their contract.

I also understand that unauthorized disclosure or inspection of EIV data may result in civil and criminal penalties. The penalties are as follows:

Unauthorized disclosure may result in me being found guilty of a misdemeanor and fined not more than \$5,000 and/or imprisoned up to five (5) years.

- **Unauthorized inspection** of EIV data may result in me being found guilty of a misdemeanor and fined not more than \$5,000 and/or imprisoned up to five (5) years.

I understand that my user ID and password are to be used only by me. Under no circumstances will I reveal or allow use of my user ID or password by another person. Nor will I use another person’s password and user ID. I will protect EIV data within my control, whether online, printed, or stored in media, from unauthorized access and disclosure.

I understand and agree to follow all HUD standards, policies, and procedures.

I certify that I have: 1. participated in the initial PIH EIV system training, and 2. within the past twelve (12) months the security awareness training, and 3. I agree to participate in annual security awareness training and 4. periodic PIH-EIV system training as required by HUD.

Failure to provide this certification or participate in training will result in denial or discontinuation of EIV Access.

User’s Name	Date
(Print Full Name)	

User’s Signature

- ✓ Check here for **ELECTRONIC SIGNATURE** (Original signed document **must** be on file and is subject to inspection)

Note: All EIV system users are required to complete initial EIV system training provided by HUD prior to accessing the system. All individuals who will view and/or handle printed or electronic EIV information are required to complete annual Security Awareness training. Security Awareness training provided by third parties is acceptable when HUD has not offered such training.