

**U.S. Department of Housing and Urban Development (HUD)
Upfront Income Verification (UIV) Monitoring Report**

Purpose: An Upfront Income Verification (UIV) onsite/remote review is required of any PHA that is subject to a Comprehensive Review in accordance with the Department's Management Plan.

The purpose of HUD's UIV onsite/remote review is to ensure that the PHA has:

- 1) Implemented the use of the HUD-provided UIV tool, the EIV system;
- 2) Implemented and documented practices, controls and safeguards to adequately protect the confidentiality and security of participant income data; and,
- 3) Taken the appropriate corrective action to eliminate subsidy payment errors and tenant errors attributable to tenant under reporting of income.

UIV Review Date: MM/DD/YYYY

Reviewer Name:

Check this box if this is a follow-up review

Date of Previous Review: MM/DD/YYYY

PHA Code:

PHA Name:

Program Type (Check one only): **Section 8** **Public Housing** **Combined Programs**

PHA Contact Person:

Telephone Number:

PHA Contact Person:

Telephone Number:

A. PHA'S IMPLEMENTED UIV TOOLS

1. **Yes** **No** Does the PHA have access to HUD's EIV system?
If yes, answer questions 2-4. If the answer is no, skip questions 2-3.
2. **Yes** **No** According to the EIV PHA Access Usage Report, has the PHA used the EIV system within the last 30 days?
3. **Yes** **No** According to the EIV PHA Access Usage Report, has the PHA used the EIV system within the last 180 days?
4. **Yes** **No** Does the PHA use UIV tools that are not provided by HUD?
If yes, please list the tools that the PHA has implemented.
Specify

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B. PHA SECURITY ASSESSMENT

Requirements: Field office staff should review the PHA's: 1) security policies and procedures; 2) EIV user administration reports; 3) security and system access files; and, 4) any other documents that will provide answers to the questions below. Field office staff may also conduct an interview with the Executive Director, Security Officer, and/or other designated staff persons that have knowledge of the PHA's security procedures and policies, and are able to respond to the questions below.

1. Yes No Does the PHA have a designated Security Officer **or** equivalent?
2. Yes No Does the PHA have a Security Policies and Procedures document?
3. Yes No Does the PHA enforce security procedures?
4. Yes No Does the PHA keep records and monitor security issues?
5. Yes No Does the PHA conduct and document Security Awareness Training for its employees?
6. Yes No Does the PHA ensure that each user has and uses his/her own user ID and password?
7. Yes No Does the PHA maintain copies of signed access authorization and rules of behavior/user agreement forms for each EIV system user?
8. Yes No Does the PHA maintain a key control log to track the inventory of keys available for secure rooms, buildings or file cabinets?
9. Yes No Does the PHA maintain a log of all destroyed UIV documents **or** have a record retention policy?
10. Yes No Does the PHA have a valid (dated within the last 15 months) HUD Form 9886 **or** equivalent consent form in the tenant file?
11. Yes No Does the PHA document the *occurrence* of all improper disclosures of UIV information in writing **or** have a procedure to document improper disclosures?
12. Yes No Does the PHA report any *occurrence* of unauthorized access or known security breaches to the designated PHA/HUD staff person(s) **or** have a procedure to report an *occurrence* of unauthorized access or known security breaches to the designated PHA/HUD staff person(s)?

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13. Yes No Does the PHA use any of the security methods listed below to provide physical security of UIV data? If yes, check all security methods the PHA uses.
- Restricted areas Locked containers Locked rooms
 Locked file cabinets Reinforced perimeters Locked buildings
(with or without guards) Other Specify
14. Yes No Does the PHA dispose of UIV information once the data has been used, served its purpose and the PHA no longer needs to maintain this information in files? If yes, check all disposal methods the PHA uses.
- Burn Shred Erase Other Specify

Certification of PHA Security Compliance

- The PHA is in compliance with UIV security procedures. (If **all** responses are “yes” in Section B)
- The PHA is **not** in compliance with UIV Security procedures. (If **any** response is “no” in Section B)

As a result of non-compliance, HUD field office staff will take the following actions:

- Immediately terminate the following users’ (list only the user IDs below) access to the EIV system. (Check here if the answer to **only** question 7 is “no”): **i.e. M12345**
- Immediately terminate **all** PHA users’ access to the EIV system. (Check here if in **addition to question 7, the answer to any question is “no”**)
- Schedule a follow-up UIV Review within 90 days of this review or sooner. (Required for any PHA that is not in compliance with UIV Security Procedures. **Note:** Field office staff is required to submit a new UIV Monitoring Report to HUD Headquarters for follow-up review)

<u>HUD Headquarters Use Only</u>	
Date UIV Monitoring Report Received	MM/DD/YYYY
Date EIV System Termination(s) Confirmed	MM/DD/YYYY
Date Follow-up UIV Review Due	MM/DD/YYYY
Date Follow-up UIV Review Due	MM/DD/YYYY

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**C. ELIMINATION OF SUBSIDY PAYMENT AND TENANT RENT ERRORS THROUGH
RESOLUTION OF UIV INCOME DISCREPANCIES**

Requirements: Field office staff is responsible for selecting five (5) additional tenant files, **per program** reviewed, with the highest dollar income discrepancy at the **100 percent** threshold level as disclosed on a current Income Discrepancy report from the EIV system. Record the information from the Income Discrepancy Report in the tables below. Maintain a copy of the Income Discrepancy report used to select the files with your review work papers. Indicate N/A if there are no families listed on the Income Discrepancy Report. If the PHA has an interim increase policy, staff should use the annualized last quarter annual income discrepancy amount, if it is greater than the actual annual income discrepancy amount, otherwise use the actual annual income discrepancy amount. If the PHA does **not** have an interim increase policy, staff should use the actual annual income discrepancy amount.

The Field office staff should review tenant case files and/or PHA documentation to ensure that the PHA is aware of the income discrepancy, and has taken action to determine whether the income discrepancy is *valid* or *invalid*. In the event of a valid case, the Field office staff is required to confirm that the PHA has taken the appropriate action to eliminate subsidy payment errors and tenant rent errors attributable to the valid income discrepancy. Some examples of appropriate corrective actions are: calculation of retroactive rent due to the PHA, correct monthly tenant rent share, execution of retroactive rent repayment agreement with tenant, and/or termination of assistance.

Place an “X” in the applicable column (valid or invalid) to indicate the classification of the income discrepancy.

Valid income discrepancies are those discrepancies where the tenant misrepresented his/her income.

Invalid income discrepancies are those discrepancies where the PHA has determined the discrepancy is invalid for one of the following reasons (insert **only** one reason code in the “reason invalid” column):

1. The effective date of the income not reported was **after** the tenant interview date (or tenant declaration date for mail-in reexams) for the reexamination of income **and** the PHA does not have an interim increase policy, thus, the tenant was not required to report the income;
2. The family had a decrease in income, which was verified by the PHA;
3. The PHA made a 50058 reporting error;
4. The PHA made an administrative error;
5. The tenant disputes the data and has contacted the income source to request correction of the erroneous UIV data;
6. The tenant indicates he/she is the victim of identity theft and has submitted a police report or other documentation to support this claim **and** contacted the income source to request correction of the erroneous UIV data; and,
7. The tenant indicates that he/she has willingly shared his/her SSN with another person.

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Specify date of Income Discrepancy Report used to select additional tenant files: MM/DD/YY
(Maintain a copy of the Income Discrepancy Report with your review work papers)

Public Housing – Check here if not applicable <input type="checkbox"/>			Check here if no income discrepancies listed <input type="checkbox"/>				
Last 4 Digits of HOH's SSN	HOH's Last Name	Project Number	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid	Reason Invalid
			\$	\$			
			\$	\$			
			\$	\$			
			\$	\$			
			\$	\$			
Totals			0	0			

Section 8 – Check here if not applicable <input type="checkbox"/>			Check here if no income discrepancies listed <input type="checkbox"/>				
Last 4 Digits of HOH's SSN	HOH's Last Name	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid	Reason Invalid	
		\$	\$				
		\$	\$				
		\$	\$				
		\$	\$				
		\$	\$				
Totals		0	0				

PHA Income Discrepancy Summary

Program	Annual Income Discrepancy (Actual)	Annual Income Discrepancy (Annualized Last Quarter)	Valid	Invalid
Public Housing	\$	\$		
Section 8	\$	\$		
Totals	0	0	0	0

HUD's completed Upfront Income Verification (UIV) Monitoring Report was provided to the following PHA staff person:

PHA Staff Name, Title

MM/DD/YYYY