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## Verifications

Due to the pandemic, HUD allowed PHAs to adopt waivers of the verification standards related to income, citizenship, and social security numbers. With so many PHAs operating remotely, HUD also provided a waiver that PHAs could adopt regarding the Enterprise Income Verification (EIV) monitoring requirements. While HUD provided waivers of verification requirements and EIV monitoring requirements, PHAs were required by PIH Notice 2021-14 to adopt any specific waiver they wished to use.

This section contains information applicable to the Public Housing, Housing Choice Voucher and Mod Rehab programs.

### Income Verifications

#### [PH and HCV-3: Family Income and Composition: Annual Reexamination: Income Verification Requirements](#)

Period of Availability for PH and HCV-3: April 10, 2020, to December 31, 2021

#### [MR-0: Family Income and Composition: Annual Reexamination: Income Verification Requirements](#)

Period of Availability for MR-0: August 26, 2020, to December 31, 2021

PHAs were permitted to adopt HUD waivers that allow PHAs to use self-certification as the highest form of income verification at admission, and for annual reexaminations and interim reexaminations.

Income information verified prior to January 1, 2022, under this waiver is acceptable for admission, annual, or interim reexaminations, even if the effective date of the action is after January 1, 2022. If there is outstanding income information that has not been verified by January 1, 2022, the remaining income must be verified, in accordance with HUD regulations, using the verification hierarchy as described in [Notice PIH 2018-18](#). HUD does not define the amount of time a PHA must wait before moving to a lower form of verification. PHAs may determine the appropriate amount of time between levels of verification in their procedures.

A PHA must obtain third-party verification of all family assets upon admitting a family to the HCV or public housing program and then again at least every 3 years thereafter. During the intervening annual reexaminations, a PHA has the discretion to accept a family's declaration that it has total net assets equal to or less than \$5,000, without taking additional steps to verify the accuracy of the

declaration. If a family submits such a declaration, then the PHA does not need to request supporting documentation (e.g., bank statements) to verify the assets or the amount of income expected to be received from those assets.

Typically, a schedule for verification of assets equal to or less than \$5,000 would be:

Admission: (Year 0)	Verify all assets
Year 1:	Accept family declaration if less than \$5,000
Year 2:	Accept family declaration if less than \$5,000
Year 3:	Verify all assets
Year 4:	Accept family declaration if less than \$5,000
Year 5:	Accept family declaration if less than \$5,000
Year 6:	Verify all assets

Beginning April 2020, PHAs were permitted to adopt waivers that waived the requirement to obtain third-party verifications during annual and interim reexaminations. If the “Year 3” period occurred between April 2020 and December 2021 for a PHA that adopted the waivers and implemented the alternative requirement to accept self-certification as the highest form of verification, the verification of assets would occur as follows, with the three-year clock resetting:

Admission: (Year 0)	Verify all assets
Year 1:	Accept family declaration if less than \$5,000
Year 2:	Accept family declaration if less than \$5,000
Year 3:	Accept family declaration if less than \$5,000 ( <b>waiver year</b> )
Year 4:	Verify all assets
Year 5:	Accept family declaration if less than \$5,000
Year 6:	Accept family declaration if less than \$5,000
Year 7:	Verify all assets

It should be noted that the assets of families living in units located in Low-Income Housing Tax Credit properties must be verified annually, regardless of the value of the assets. PHAs are also reminded that if the waiver/alternative requirement is utilized, then they are responsible for addressing material discrepancies and must take enforcement action in accordance with their policies and procedures.

### WHAT PHAs CAN DO

Communication with families is key to ensuring required information is received timely. PHAs can send special notices reminding families of their obligation to submit more than a self-certification if higher levels of verification exist. It may continue to be difficult for families to obtain information needed to support income and deductions so PHAs can document instances where self-certification was used due to the unavailability of higher-level verifications.

## Enterprise Income Verification (EIV) Monitoring

### PH and HCV-5: Enterprise Income Verification (EIV Monitoring)

Period of Availability for PH and HCV-5: April 10, 2020, to December 31, 2021

### MR-4: Enterprise Income Verification Monitoring

Period of Availability for MR-4: August 26, 2020, to December 31, 2021

PHAs were permitted to adopt a waiver to suspend mandatory monitoring requirements of the EIV reports during the period of availability.

PHAs must resume standard monthly and quarterly monitoring of all mandatory EIV reports, including the Deceased Tenants Report, the Identity Verification Report, the Immigration Report, the Multiple Subsidy Report, the New Hires Report, and the Income Validation Tool (IVT) Report. All reports should be maintained for a period of at least three years or longer as required from the effective date of the action, in accordance with Notice [PIH 2018-18](#).

If an EIV or IVT Report shows an income source that was not reported by the tenant or a substantial difference in the reported income, the PHA must discuss the income discrepancy with the tenant and request that the tenant provide documentation to confirm or dispute the unreported or underreported income. If the tenant is unable to provide acceptable documentation to resolve the discrepancy, the PHA is required to request from the third-party source information necessary to resolve the income discrepancy. If applicable, the PHA must determine the tenant's underpayment of rent due to unreported or underreported income, retroactively and take any other appropriate action as directed by HUD or the PHA's administrative policies.

## Social Security Number and Citizenship Verification

### PH and HCV 9: Eligibility Determination: Social Security Number and Citizenship Verification

Period of Availability: April 10, 2020, to December 31, 2021

HUD allowed PHAs to adopt a waiver of the requirement to obtain and verify social security number (SSN) documentation and documentation evidencing eligible noncitizen status before admitting applicants to the HCV and Public Housing programs.

PHAs must obtain social security and citizenship status verification documents to determine eligibility for the Public Housing or HCV program beginning January 1, 2022. For the HCV program, eligibility must be determined prior to voucher issuance.

PHAs that adopted this waiver were required to implement alternative policies for individuals to provide the mandatory documentation within 90 days of admission. PHAs must continue to verify social security number and citizenship status to continue assistance for families admitted under this waiver.

### WHAT PHAs CAN DO

PHAs may consider establishing procedures to ensure that the SSN and eligible noncitizen status have been verified for all families who were admitted under the terms of this waiver, by reviewing the documentation in the file during the regular 2022 annual reexamination cycle. PHAs must establish a process for addressing any material discrepancies (i.e., erroneous SSNs or date of birth) that may arise later and are obligated to take enforcement action(s) in accordance with their policies and procedures.