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Background:

PIH began a program in 2005 to upgrade the ability in PIC Form 50058 to validate tenant identity data to prevent fraud and duplication of benefits. Various pieces have been added to PIC-IMS since then. The December, 2006 PIC release added the final piece: functionality in the Tenant ID Management submodule to modify Social Security Numbers (SSNs) and Alternate IDs ("AIDs") for any household member when they are identified as “invalid” or “duplicate” in the reports. The modification then is replicated for all of the PHA’s tenant records containing the SSN or AID. For security and data integrity reasons, PIC requires that the household be identified with an identity validation problem in the reports before the modify SSNs and AIDs functions can be used.

Prior releases have added the other parts of the tenant identity validation program, including:

- Requiring a valid ID number (SSN or AID) for all household members.
- Testing all SSNs when received against the latest Social Security Administration (SSA) validation formula.
- Testing all SSNs monthly by directly comparing the tenant last name, date of birth and gender from PIC against the SSA database.
- Testing all AIDs by comparing the uploaded tenant name, date of birth and gender when received against the PIC AID assignment database.
- Comparing the names and birth dates of all household members nationwide to identify possible duplicates for follow-up action.
- “Flagging” all households which have a member with an apparent tenant identity discrepancy.
- Blocking any subsequent Form 50058 action for a “flagged” household (except “move-out” or “void”) until the tenant identity discrepancy is resolved.
- Adding “Invalid Tenant ID” and “Possible Duplicate Tenant” reports to display the various tenant identity validation discrepancies.
- Adding the optional ability to transfer an AID from a former PHA to the current one.

In concept, PIC will generally accept tenant IDs that may be possibly invalid in order to track the issue to a resolution. Therefore, the Tenant ID Management tools that change SSNs and AIDs require that the validation process identify them as “invalid”. Once they are identified as “invalid” in the Invalid Tenant ID Report or the Possible Duplicate Tenant Report, the user can and should proceed to resolve the problem. When changing the tenant ID (except from Alt ID to SSN), the system requires the tenant to appear in one of the two reports as justification for making the change. The system retains an audit trail of all identity changes made and who made them.

As a legacy of the “MTCS” mainframe tenant data system, PIH gathered data on all tenants but only required SSN identification for the head of household and it was not validated by PIH.
Other household members could use either a real SSN or a dummy number as a place holder. The dummy SSNs were not unique and were not tested for validity. PIH was required by the outcome of a HUD Inspector General (IG) audit to make the tenant identity process more secure to prevent fraud and waste. PIH has developed a series of processes that accomplish this. First and foremost is the requirement for valid tenant identification numbers, whether SSNs or AIDs for every tenant, regardless of age.

PIH began requiring unique identification numbers for every household member reported to the system in Form 50058 on or after February 19, 2005. The unique identifier may be a valid SSN or a valid AID. The unique identifier replaces the prior “dummy” identifier but only in the current (most recent) Form 50058 record. PHAs that have not yet reported a unique identifier (SSN or AID) using Form 50058 for a family member who has a “dummy SSN” must first do so using the normal Form 50058 submission process. Tenant ID management is intended for use only after the unique identifier has been initially reported in Form 50058.

Tenant Identity Discrepancies

Now that all of the elements are in place for the Tenant Identity Validation Program, users need to begin learning how to use the tools to manage the tenant identity process.

There are nine kinds of tenant identity discrepancies that are displayed in the reports as indicated:

1. **Algorithmically Incorrect** in the Invalid Tenant ID Report. Invalid SSN based on SSA validity formula. *HUD uses a validity formula updated monthly by the SSA projecting which number groupings have been used or will be used during the month to assign SSNs.*

2. **Invalid SSN** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA. *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

3. **Invalid Last Name** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA. *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

4. **Invalid DOB** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA. *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

5. **Invalid Deceased** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA. *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

6. **Invalid AID**. Invalid AID based on name and birth date validation against the AID assignment table. This will appear as “Invalid AID” in the “Invalid Tenant ID Report”. *Based on a direct comparison with the data provided at the time the AID was originally generated by the PHA.*

7. **Duplicate ID**. Duplicate tenant IDs (SSNs or AIDs) in more than one current record. These duplicate tenant IDs will appear in the Possible Dup Tenant Report. *The same*
8. **“Duplicate Personal Data”**. Possible duplicate tenants based on having the same name and birth date in different PHAs. Two or more matching records in the Possible Duplicate Tenant Report. *Based on a comparison of names and birthdates in current Form 50058 records. Must be resolved by PHA comparison of other tenant data and physical description to resolve whether these are really duplicates.*

9. **“Invalid Last Name”** in the Possible Duplicate Tenant Report, based on a test of the contents of the last name field. If it contains numerals or illegal characters, it will be flagged as invalid. Upper and lower case letters, commas, periods, and hyphens are the only characters permitted in the last name.

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**Tenant ID Management Reports**

There are two reports used regularly in Tenant ID Management: The Possible Dup Report and the Invalid Tenant ID Report.

As its name implies, the Possible Dup Tenant Report lists two or more household members at one or more locations with the same first and last names and dates of birth. If the tenant appears here, the household is “flagged” as described earlier. Removal of the flag is accomplished by a PHA user certifying that the tenant is not a duplicate and providing a justification for the certification. Justification is based on contact with the management of the other PHA(s) and comparing information. *Note: After a PHA has certified that the tenant is not a duplicate, the report will list the tenant as “Removed” (meaning the flag is removed) until the other PHA also certifies for its tenant. Then both tenants will disappear from the report the next day.*

The Invalid Tenant ID Report lists household members whose SSN or AID was evaluated as invalid. Tenant ID Discrepancies 1-6 listed previously will be displayed in this report.

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**Tenant ID Management Tools**

To address these tenant ID problems, there are eight tenant ID management tools:

*Please note: these Tenant ID Management tools are never to be used to correct “dummy” SSNs of the format “999999999”, “111111111”, “123456789”, etc., which were once used for non-heads of household because multiple persons in more than one household may be using the same “dummy” SSN. These “dummy” SSNs may only be updated to a real SSN or AID by submitting a Form 50058. Failure to heed this warning will result in serious tenant data corruption.*

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**Tenant ID Management Tools**

1. *Change an SSN to an AID.*
2. *Change an SSN to a new SSN.*
3. Change an AID to new AID.
4. Change and AID to an SSN.
5. Generate an AID for a tenant without a valid SSN.
6. Correct AID assignment information (correct name or birth date)
7. Transfer an AID from another PHA to your PHA.
8. Certification by a high-level user that a possible duplicate tenant based on name and birth date is not really a duplicate (requires user to enter an explanation).

Testing Procedure

PIC will accept the first Form 50058 submission for a household with suspected invalid or duplicate tenant identification numbers or identities and give the user a “warning”. However, the household is then “flagged” and the system will not accept further Form 50058 transactions (except EOP, Void or Correction) for a flagged household until the flag is removed. The “flag” is not displayed. However, the households that are flagged for any tenant appear in the “Possible Dup Tenants Report” or the “Invalid Tenant ID Report”. (These reports are available in the “Reports” tab of the Tenant ID Management submodule).

The system tests SSNs at two different stages of the business process. When uploaded, each SSN will be tested against a formula (“algorithm”) updated monthly by the SSA which contains combinations of numbers that are to be used and are therefore valid. Then, once per month early in the month, the SSNs in PIC (with names, genders and birth dates) are sent to the SSA for comparison with their actual national data. The SSA provides a response that says that the data elements match (are valid) or that certain specified data elements do not match. The Invalid Tenant ID Report in the Tenant ID Mgt Reports tab lists the results of these tests around mid-month.

If the validation is not successful at the SSA, the only ways to remove the invalid SSN flag are to (1) change the data at the PHA or (2) change the data at the SSA. Change the data at the PHA by submitting a “correction” Form 50058. (A head of household SSN can not be corrected this way; see item 2 under “Tenant ID Discrepancies – Summary of Actions” on page 7.) Only the tenant can change the data at the SSA. Changes are made at the SSA by submitting a Form SS-5 to them. Instructions are available at http://www.socialsecurity.gov/online/ss-5.html. If neither of these options is available, the PHA may generate an AID for the tenant and use the “Replace SSN with AID” function to remove the flag.

It should be noted that not all Social Security cards are valid. There are people who sell forged Social Security Cards in most larger cities. Therefore, the only true test of a Social Security Number is to send the identifying information to the SSA and compare with their data. In addition, the SSA gathers data in hundreds of local offices and forwards the data to the national database, with which HUD compares. However, there may be a time lag between the local collection of the data and its appearance in the national database.

The PIC-IMS system also tests AIDs when received against the AID personal data (name, gender and birthdate) from the AID table. If it does not match, the household will be flagged. A user can correct the personal data in the AID table.
Every night, the system compares all of the members and heads of every active household nationwide to identify persons with duplicate SSNs, AIDs or name and date of birth. These households are also flagged. A user consults with management of the other PHA to determine if there truly is a duplication. If there is, one PHA must remove the duplicate from the lease by submitting a correction or interim re-exam. If they are not duplicates, both PHAs certify that there is no duplication to remove the flags.

**Tenant ID Discrepancies – Summary of Actions**

With one exception, tenant IDs may only be changed with the Tenant ID Management tools if they appear in one of the two reports: Invalid Tenant ID Report or Possible Duplicate Tenant Report. *The exception is changing an AID to an SSN, which does not appear in either of the reports, but may be changed at any time.*

1. **Invalid SSN** based on SSA validity formula (“Algorithmically Incorrect”). The flag can be removed by the user correcting the SSN, if it is wrong (Change SSN to new SSN) or by the monthly SSA validation which says it is actually valid. Alternatively, the PHA may generate an AID and replace the suspect SSN with the AID (Change SSN to AID) to remove the flag.

2. **Invalid SSN** based on direct, monthly SSN validation by the SSA. There is a data mismatch between PIC and the SSA and the data must be changed in PIC or at the SSA to remove the flag. To change the data in PIC, resubmit a corrected Form 50058 (field 2c=”Y”, etc.) if the SSN belongs to a member of the household. To correct the Head of Household SSN, the PHA must either use the Change SSN to another SSN” or, alternatively, the PHA may generate an AID for the individual and replace the suspect SSN with the AID (SSN to AID) until the data mismatch can be resolved, then replace the AID with the corrected SSN (AID to SSN).

3. **Invalid AID** based on name, sex and birth date validation against the AID assignment table. There is a data mismatch between the data submitted on Form 50058 for the AID and the data in the AID Assignment Table. The user must modify the data in the Form 50058 or in the AID Assignment Table so they match in order to remove the flag (“Other” in Tenant ID Management). In certain cases where the individual has appeared in the Invalid Tenant ID Report, only one data element may be corrected at a time. If more than one AID data element is in error, the user will not be able to correct all of the errors and should therefore generate a new AID for the person and use Change AID to a new AID (AID to AID).

4. **Duplicate tenant IDs** (SSNs or AIDs) in more than one current record. This can almost never be *true. Therefore, at least one of the duplicate IDs is wrong and the user with the error must identify and correct the one that is incorrect to remove the duplicate ID flag from both. *Note: Situations where two assisted households legitimately share custody or familial visitation of a child are exceptions to this rule. According to the HUD program office handling these sorts of issues, it is against the law to have the same*
person listed in two leases. The program office says that the child lives in one household and is a visitor in the other household.

5. **Possible duplicate tenants** based on having the same name and birth date. This is a situation that may or may not be okay—only PHA staff can investigate and determine whether these instances of the same name and birth date refer to the same person or two different persons. If the possible duplicates refer to the same real person, the “losing” PHA must submit a Form 50058 with either an Interim Re-exam removing the individual from the lease or an EOP for the household (the user may also use an online EOP). If they refer to two (or more) different persons, each PHA may remove the flag from their household for their PHA by certifying that their tenant is not a duplicate. The other PHA must remove its own duplicate flag in the same way. Removal requires the user to enter an explanation why they are certifying a tenant as non-duplicate and the system records the date, time, comment, and User ID that entered it. Certifying as non-duplicate is described later. *(Note: Certifying a person as not a duplicate when the person is truly a duplicate could normally be construed as fraud or misfeasance.)*

**Tenant ID Management Functions**

When a tenant ID appears in one of the reports as a discrepancy, user action is required. The action required depends on the type of discrepancy. Let’s take a look at each type of tool and review how to use it to resolve discrepancies. Each of these how-to sections assumes you are logged into PIC and have clicked the main menu choice “Form 50058-Tenant ID Management”, so you are in the main tenant ID management screen. Remember: all ID replacements only change entries for your PHA. If the same ID exists in another PHA, it is not changed there.

These kinds of Tenant ID Management actions are all intended for PHA use. In normal practice, HUD users will not use them because they do not have direct knowledge of the tenants.

<table>
<thead>
<tr>
<th>Tenant ID Management Functions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Generate an AID for a Tenant</td>
</tr>
<tr>
<td>2. Transfer an AID to Your PHA</td>
</tr>
<tr>
<td>3. Correct AID Information</td>
</tr>
<tr>
<td>4. Change an SSN to an AID</td>
</tr>
<tr>
<td>5. Change an SSN to a New SSN</td>
</tr>
<tr>
<td>6. Change an AID to a New AID</td>
</tr>
<tr>
<td>7. Change an AID to an SSN</td>
</tr>
<tr>
<td>8. Certify that a Tenant is not a Duplicate</td>
</tr>
</tbody>
</table>
How do you decide which functions to use for a given problem? Let’s look at each type of problem to decide which functions would apply. The table on the next page summarizes these problems and what to do about them.

<table>
<thead>
<tr>
<th>Problem</th>
<th>What it means</th>
<th>Options to remove the “flag”</th>
</tr>
</thead>
<tbody>
<tr>
<td>‘Algorithmically incorrect’ in Invalid Tenant ID Report</td>
<td>Member SSN failed the formula test when received</td>
<td>1. Wait for the monthly SSA comparison to remove the flag.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Correct the SSN (SSN to SSN).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3. Replace the suspect SSN with an AID (SSN to AID).</td>
</tr>
<tr>
<td>‘Invalid SSN’ in Invalid Tenant ID Report</td>
<td>Member SSN failed monthly data comparison at SSA</td>
<td>1. Correct the SSN (SSN to SSN).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Replace the suspect SSN with an AID (SSN to AID).</td>
</tr>
<tr>
<td>‘Invalid Last Name’ in Invalid Tenant ID Report</td>
<td>Member SSN’s last name did not match last name at SSA</td>
<td>1. Get last name changed by tenant at SSA or at PHA (if at PHA, then PHA submit name correction).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Replace the SSN with an AID with correct name (SSN to AID).</td>
</tr>
<tr>
<td>‘Invalid DOB’ (Date of Birth) in Invalid Tenant ID Report</td>
<td>Member SSN’s Date of Birth did not match DOB at SSA</td>
<td>1. Get DOB corrected by tenant at SSA or at PHA (if at PHA, then PHA submit DOB correction).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Replace the SSN with an AID with correct DOB (SSN to AID).</td>
</tr>
<tr>
<td>‘Invalid Deceased’ in Invalid Tenant ID Report</td>
<td>Member’s SSN is listed as deceased at SSA</td>
<td>1. Submit Form 50058 removing deceased member from household.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. If Head of Household deceased, submit change of HOH and remove deceased from household.</td>
</tr>
<tr>
<td>‘Invalid AID’ in Invalid Tenant ID Report</td>
<td>Member AID failed comparison of name and DOB with the data in the PHA’s AID table</td>
<td>1. If the last name or DOB is different, correct the last name or DOB (only one or the other).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Generate a new AID and replace the invalid AID with the new AID (AID to AID).</td>
</tr>
<tr>
<td>‘Duplicate Personal Data’ in Possible Dup Tenant Report</td>
<td>Member’s name and DOB match the name and DOB of a member of another household in PIC</td>
<td>1. If they are the same person, one PHA must remove the tenant from the lease or do an EOP.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. If they are not the same person, each PHA certifies to that effect.</td>
</tr>
<tr>
<td>‘Duplicate ID’ in Invalid Tenant ID Report</td>
<td>Member’s SSN or AID matches the SSN or AID of a member of another household</td>
<td>1. Wait for monthly SSA comparison to flag one or the other as “invalid” so it can get corrected. If yours, then correct it.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2. Generate a new AID and replace the duplicate AID with the new AID (AID to AID).</td>
</tr>
</tbody>
</table>
Details of Tenant ID Management Functions

**Generate an AID for a tenant**
To generate an AID for a tenant, click “Generate ID” (if it is not already highlighted orange). The screen below will appear.

Generate AID (top half)

Enter the last and first name, middle initial and choose sex (Male or Female). Enter the date of birth and place of birth. Select the proper ethnicity (Hispanic or Non-Hispanic). Then scroll down to complete the screen as shown below.

Check all race codes that apply (based on information available) and enter a reason for not having an SSN, such as “newborn” or “legal status”.

Enter the Alien Registration Number (omitting the “A” prefix) if applicable.
Click “Generate AID” and the following screen appears: The generated AID is in green. Use the AID in place of the SSN (field 3n) in preparing Form 50058.
Transfer an AID to Your PHA

If you attempt to generate an AID for a tenant and the system already has a tenant with the same name and date of birth, the system will display the information for the matching tenant and ask whether you want to transfer the AID to your PHA. Review the identifying data and decide whether it is the same person. If it is, you may click the circle in the left column and “Use selected” and the AID will be transferred to your PHA for your use. If you prefer not to or you think it is not the same person, click “Generate new AID” and it will generate the new AID for your PHA to use in submitting Form 50058.

If you click “Use selected” the following screen appears to report success.
Correct AID assignment information

When a tenant’s personal information submitted does not match the data in the AID table, you must update the data in the AID assignment table associated with the AID. PIC compares the name, sex and birth date information on the Form 50058 submitted for an AID with the information recorded at the time the AID was generated. If it does not match, then the tenant appears in the Invalid Tenant ID Report and the household is flagged.

To remove the flag, click “Replace ID” and choose “Other Data”.

Enter an AID for a tenant with an Invalid AID according to the Invalid Tenant ID Report and click “Search”. The data entry screen below appears. If there is a discrepancy flag, you may only correct the last name, or the birth date, or the sex and first name. Click “Save”. If the changed data matches the data in the Form 50058, the flag is removed.
(For a generated AID that has never been submitted in a Form 50058, you may bring it up in “Other Data” and change any or all items as needed.)

**Change SSN to AID***

When a tenant furnishes an SSN that (1) cannot be validated or (2) it is a duplicate and the other SSN instance is determined to be correct and the tenant cannot provide evidence of a new or corrected SSN. Note: You must first generate the Alt ID for this person. *You must never use this action to correct a “dummy” SSN such as “999999999” or “123456789”. “Dummy” SSNs must be corrected by submission of a Form 50058 with a valid tenant ID (SSN or AID) for each of the individual(s).

Click “Replace ID” on the blue bar. The screen below appears. Click the appropriate Modification Type “SSN to Alt ID”. Input the SSN to be replaced and the Alt ID with which to replace it. Select the correct choice from the “Invalid/Duplicate Status” box. *(You must select the one that matches the “Invalid/Duplicate Status” flag in the Invalid Tenant ID Report).* Selecting the wrong flag will cause the SSN to AID replacement to fail. Replacement is an overnight batch process so the replacement (or failure) will be shown the following day in the Tenant ID Modification Report.
If the process fails, you will need to correct and resubmit the ID replacement.

Change SSN to new SSN*

Click “Replace ID” on the blue bar. The screen below appears. Click the appropriate Modification Type “SSN to SSN”. Input the SSN to be replaced and the new SSN with which to replace it. *NOTE: You must never use this screen to replace a “dummy SSN” of the type (“999999999”, etc.) formerly used for household members who had no SSN.

Select the “Invalid/Duplicate Status” that matches the “Invalid/Duplicate Status” in the Invalid Tenant ID Report and choose a “Reason” by clicking to highlight your choice, then enter a comment in explanation as shown in the screen below. Click “Save” to initiate the transaction. The update is done by an overnight process and will replace all instances of the SSN specified with the new SSN provided throughout the agency’s tenant data by the following morning.

If you choose an “Invalid/Duplicate Status” that does not match the Invalid Tenant ID Report, the replacement process will fail. The result in either case will be reflected in the Tenant ID Modification Report the following day.
Change AID to new AID

Generate New AID or Use Selected  Note: You must first generate the new Alt ID for this person as explained earlier. If you input data for a potential tenant and there is another person in the AID tables with the same first and last name, sex and date of birth, PIC will display the match and ask you:

Alt ID for the Tenant with the Same Name, DOB and Sex already exists

Generate New AID or Use Selected

If you click “Use Selected”, the existing AID will be transferred to your agency’s AID table for use. If you click “Generate New AID”, it will create a new AID for use at your agency but the tenant may appear later on a “Possible Dup Tenant Report”. See Page 12 above (“Transfer an AID to Your PHA”) for the details how to “Use Selected” AID.
Once you first generate the new AID as explained above, to replace an AID with a new AID, click “Replace ID” on the blue bar. The screen above appears. Click the appropriate Modification Type “AID to AID”. Input the old AID to be replaced and the new AID with which to replace it.

Select the “Invalid/Duplicate Status” and the “Reason” by clicking to highlight them, and then enter an explanation as shown in the screen above. The Invalid/Duplicate Status must match the status from the Invalid Tenant ID Report or the status in the Possible Dup Tenant Report. If no item applies, leave “Invalid/Duplicate Status” blank. Click “Save” to initiate the process. The update is done by an overnight process and will replace all instances of the AID specified with the new AID entered, throughout your agency’s tenant data, by the following morning. The result of the processing will be shown in the Tenant ID Modification Report the next day. If it failed, the report will say so and you must correct the data and re-submit the request.

**Change AID to SSN**

To replace an AID with an SSN, click “Replace ID” on the blue bar. The screen below appears. Click the appropriate Modification Type “AID to SSN”. Input the AID to be replaced and the new SSN with which to replace it.
Select the “Invalid/Duplicate Status” and the “Reason” by clicking to highlight them, and then enter an explanation as shown in the screen above. Click “Save” to initiate the transaction. The update is done by an overnight process and will replace all instances of the AID specified with the SSN provided throughout the agency’s tenant data by the following morning. If the process fails, correct the data errors and resubmit.

**Certify that a tenant is not a Duplicate**

A PHA would normally determine that a tenant whose name appears in the Possible Dup Tenant Report is not really a duplicate by one of the following actions:

- Finding out from the other PHA involved that the tenant is no longer present at the previous PHA.
- Finding out from the other PHA that the physical descriptions for the two individuals are different.
- Finding out from the other PHA that the individual is physically present at the other PHA at the same time he/she is physically present at your PHA.

To certify that a tenant whose name appears in the Possible Dup Tenant Report is not really a duplicate, click “Duplicates” so the screen looks like below:
Enter the Tenant ID and/or Last Name of the person to be certified. Click “Search”. Results will display in a screen like the one shown below. To certify that tenant ‘Walter Weight’ is not a duplicate, select the button at the left of his name, enter an explanation why you are certifying non-duplicate, and click the “Remove” button. This will remove the duplicate flag for your PHA. The other PHA will have to remove its own flag the same way. In the report, your tenant will be marked “Removed” until the other does it.
Summary of the Tenant ID Management Flags

1. **“Algorithmically Incorrect”** in the Invalid Tenant ID Report. Invalid SSN based on SSA validity formula. *HUD uses a validity formula updated monthly by the SSA projecting which number groupings have been used or will be used during the month to assign SSNs.*

2. **“Invalid SSN”** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

3. **“Invalid Last Name”** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

4. **“Invalid DOB”** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

5. **“Invalid Deceased”** in the Invalid Tenant ID Report based on direct, monthly SSN validation by the SSA *Based on a direct comparison of last name (first 8 characters), birthdate, and SSN with the national SSA files.*

6. **“Invalid AID”**. Invalid AID based on name and birth date validation against the AID assignment table. This will appear as “Invalid AID” in the “Invalid Tenant ID Report” *Based on a direct comparison with the data provided at the time the AID was originally generated by the PHA.*

7. **“Duplicate ID”**. Duplicate tenant IDs (SSNs or AIDs) in more than one current record. These duplicate tenant IDs will appear in the Possible Dup Tenant Report. *The same tenant ID is appearing more than once as a current tenant, which cannot possibly be true (except in cases of shared custody or familial visitation of children).*

8. **“Duplicate Personal Data”**. Possible duplicate tenants based on having the same name and birth date in different PHAs. Two or more matching records in the Possible Duplicate Tenant Report. *Based on a comparison of names and birthdates in current Form 50058 records. Must be resolved by PHA comparison of other tenant data and physical description to resolve whether these are really duplicates.*

9. **“Invalid Last Name”** in the Possible Duplicate Tenant Report, based on a test of the contents of the last name field. If it contains numerals or illegal characters, it will be flagged as invalid. Upper and lower case letters, commas, periods, and hyphens are the only characters permitted in the last name.

Applying for a Social Security Number (SSN)

In order to apply for a Social Security Number (SSN), the tenant must file a Form SS-5 at the local Social Security Administration (SSA) office. These can be found in the local telephone directory under “U.S. Government Offices”. Proof of identity such as a certified copy of a birth or baptismal certificate is required.

Please consult the SSA web page [http://www.socialsecurity.gov/online/ss-5.html](http://www.socialsecurity.gov/online/ss-5.html) for details.
Summary of PIC Tenant ID Management Fatal Errors

Fatal Errors 5323 through 5327, 5331 and 5332

When HUD receives a Form HUD 50058 containing an instance of an SSN or Alt ID for any household member that is apparently invalid or a duplicate in the system, the form is accepted and processed, and the household is flagged as requiring resolution of an identity discrepancy. While the identity discrepancy flag is in existence, PIC will only accept action 6 (“EOP”) or action 15 (“VOID”) for that household.

If subsequent Form HUD 50058 is submitted containing a another instance of the same suspect SSN or Alt ID while the identity discrepancy flag is in existence, one of the following fatal errors will occur and the form will be rejected.

**FATAL: 5323 - Based on the SSA numbering scheme this SSN is invalid.**

For the SSN receiving this fatal error message in the submitted Form HUD-50058, perform one of the following options:

- If the previously submitted SSN was incorrect, replace the SSN online by using the “SSN to SSN” or “SSN to AID” modification type on the “Replace ID” page of the “Tenant ID Management” sub-module. This will remove the identity discrepancy flag. Then, please resubmit the latest Form HUD-50058 with the correct SSN or AID.

- If the SSN is recently-issued and is correct, the user will need to wait until the system receives the monthly update of the latest “SSNs issued list” from SSA (Social Security Administration). This will remove the identity discrepancy flag. Once the system has been updated with new SSA data, the SSN will no longer appear in the Invalid Tenant ID Report and then Form HUD-50058 can be resubmitted for the SSN.

**FATAL: 5324 - This SSN has been found to be Invalid upon verification with SSA**

For the SSN receiving this error message in the submitted Form HUD-50058, perform the following:

- Replace the SSN online for all prior forms by using the “SSN to SSN” or “SSN to AID” modification type on the “Replace ID” page of the “Tenant ID Management” sub-module. (You must generate the new AID before using it.) This will remove the identity discrepancy flag. Then, please resubmit the latest Form HUD-50058 with the replacement SSN or AID.
**FATAL: 5325 - This SSN has been found to be deceased upon verification with SSA.**

For the SSN receiving this error message in the submitted Form HUD-50058, perform the following:

- Resubmit Form HUD-50058 without the SSN. *This will remove the identity discrepancy flag.*
- If the individual using the suspect SSN is not deceased, replace the SSN online for all prior forms by using the “SSN to AID” modification type on the “Replace ID” page of the “Tenant ID Management” sub-module. (You must generate the new AID before using it.) *This will remove the identity discrepancy flag.* Then, please resubmit the latest Form HUD-50058 with the replacement AID.

**FATAL: 5326 - This SSN has been found to have an incorrect last name upon verification with SSA.**

For the SSN receiving this error message in the submitted Form HUD-50058, perform the following:

- Submit Form HUD-50058 with field 2c (Correction?) set to ‘Yes’, field 2d (If Correction: check primary reason) is set to either ‘Family correction (non-income)’ or ‘PHA correction (non-income)’ and field 3b (Last name) for the suspect SSN must be different than the one currently present in database. *This will remove the identity discrepancy flag.*
- If the tenant insists that the last name provided to you is correct and the SSA is incorrect, you should direct the tenant to inform the SSA of the correct last name by filing Form SS-5 at the SSA office. In the meantime, you may generate and use an AID for the person with the last name discrepancy until the SSA makes the name change.

**FATAL: 5327 - This SSN has been found to have an incorrect date of birth upon verification with SSA.**

For the SSN receiving this error message in the submitted Form HUD-50058, perform the following:

- Submit Form HUD-50058 with field 2c (Correction?) set to ‘Yes’, field 2d (If Correction: check primary reason) is set to either ‘Family correction (non-income)’ or ‘PHA correction (non-income)’ and field 3e (Date of Birth) for the SSN should be different than the one currently present in database. *This will remove the identity discrepancy flag.*
- If the tenant insists that the date of birth provided to you is correct and the SSA is incorrect, you should direct the tenant to inform the SSA of the correct birth date by filing Form SS-5 at the SSA office. Until then, generate and use an AID for the tenant with the birth date discrepancy until the SSA makes the birth date correction.
FATAL: 5331 - Last Name, First Name, Date of Birth or Sex for this AID does not match with the existing information in AID database.

For the AID receiving this error message in the submitted Form HUD-50058, perform the following:

- Verify the last name, first name, date of birth and sex for the AID in the submitted Form HUD-50058 against the existing information for this AID. Existing information for this AID can be obtained through the “AID Report” by navigating to the “Reports” business function of the “Tenant ID Management” sub-module. If the information in the submitted Form HUD-50058 is incorrect, then resubmit the Form HUD-50058 with the corrected last name, first name, date of birth or sex. This will remove the identity discrepancy flag. If the existing information for the AID needs to be updated, then update the last name, first name, date of birth or sex by using the “Other Data” modification type on the “Replace ID” page of the “Tenant ID Management” sub-module. Once the existing information has been updated, resubmit the Form HUD-50058 for the AID. This will remove the identity discrepancy flag.

When there is a discrepancy flag, you may only correct one data element (last name, first name, date of birth, or sex). If there is no discrepancy flag, you may modify more than one data element at a time.

FATAL: 5332 – The SSN/AID in this household appears in other households.

For the SSN/AID receiving this error message in the submitted Form HUD-50058, perform one of the following options:

- If the SSN/AID is no longer a member of the submitted household, submit Form HUD-50058 without the SSN/AID. This will remove the identity discrepancy flag.

- If the duplicate tenant ID belongs to a family member who is subject to joint custody or familial visitation rights and is listed in two households, PIC has requested permanent guidance from the program offices concerning how to handle them. Until guidance is received and any program changes are made, the workaround for children in a shared custody or familial visitation situation will be for each PHA to generate an AID for the child, change the tenant SSN to the new AID (SSN to AID) and, when the name appears in the Possible Dup Tenant Report, to “certify” that this is not a duplication with comments in the comment field saying it is a “Shared custody or familial visitation”.

- If the SSN/AID is still a member of the submitted household, replace the SSN with a new AID or change the AID in question to a new AID to resolve the duplicate IDs with other households for this SSN/AID. This will remove the identity discrepancy flag. Once the “duplicate issue” is resolved, resubmit the Form HUD-50058. Please refer to “Possible Dup Tenant Report” on the “Reports” page of the “Tenant ID Management” sub-module for a complete list of the SSNs/AIDs that are duplicates.
Job Aid for Tenant ID Management

Testing Flow Chart

Start

Upload Form 50058

Tests SSN vs SSA Algorithm (when received)

If Algorithmically Incorrect Flag

Invalid Tenant ID Report

Tests AID Name & DOB vs AID Table (when received)

If Invalid AID Flag

Invalid Tenant ID Report

Tests SSN, Name gender by sending ID data to SSA for validation monthly

If Invalid SSN Flag

Invalid Tenant ID Report

If Invalid DDB Flag

Invalid Tenant ID Report

If Invalid Deceased Flag

Invalid Tenant ID Report

Tests for duplicate ID and duplicate personal data nightly

If Duplicate SSN or AID Flag

Possible Dup Tenant Report

If Duplicate Personal Data Flag

Possible Dup Tenant Report

If Only END, Void or correction accepted if flagged