U.S. Department of Housing and Urban Development

Enterprise Income Verification (EIV) system

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Welcome to the presentation for the Enterprise Income Verification system. Presenter: David Sandler the IT Project Manager for EIV.

Outline

(1) EIV application

(2) Threshold Report

(3) SSN/ID Validation

(4) Single Sign On (SSO)

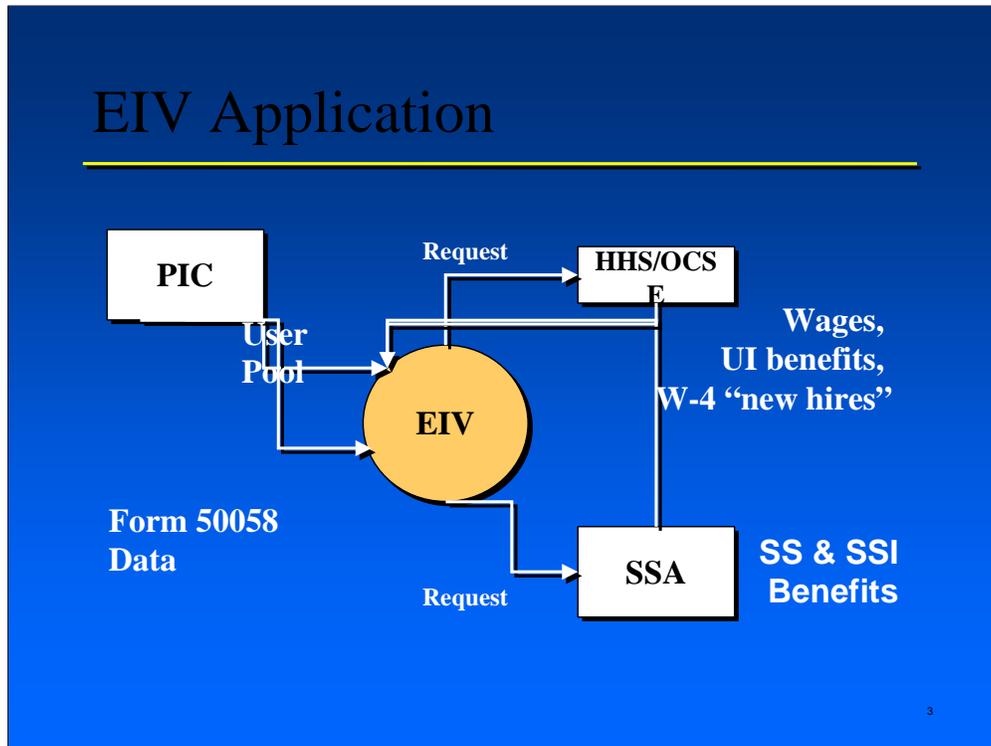**(5) Security/Privacy**

(6) User Information

(7) Plans

This is the outline of what will be covered.

First is an explanation of the various parts that make up the EIV system

Second is the Threshold Report. The Threshold Report allows our PHAs and our reviewers to prioritize which cases to look at first or most intensively, This is used by PHAs, PIH RIM Reviewers and HUD IG,

• This is the information flow to and from EIV.

• EIV gets information about the PIH tenant population from the PIC system. EIV users also are PIC users.

• EIV gets SSA/SSI information from the Social Security Administration. This is the same information seen in TASS for the states that EIV covers.

• In August EIV will replace data that it receives from 28 states with national data from the National Directory of New Hires (NDNH). The state data covers wages and unemployment insurance benefits. NDNH also provides W-4 data about new hires. The W-4 form is submitted when an employer hires a new employee.

• EIV is now rolled out in the 28 states where PIH has agreements with the states. In August, with national NDNH data available, EIV will have a phased roll out to the remaining states.

Data Displayed by EIV

- **Quarterly wages**
- **Unemployment insurance**
- **W-4 new hires data (new with August 2005 release)**
- **Social Security Benefits (SS) -- Retirement, Disability, Child, Medicare, Black Lung**
- **Supplemental Security Income (SSI) -- Need-based benefits for aged or disabled**
- **Dual Entitlement -- Survivor benefits**

These are the kinds of data that EIV will display.

EIV Data Updates

- **Social Security Administration (SSA)**
  - **Social Security Benefits (SS): Retirement, Disability, Child, Medicare, Black Lung**
  - **Supplemental Security Income (SSI): Need-based benefits for aged or disabled**
  - **Dual Entitlement: Survivor benefits**

  - **Requests will follow a 3-month cycle by blocks of states**
  - **New program participants will be added to current monthly request**

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SSA data will be updated on a 3-month cycle by state.

This 3-month cycle is necessitated by SSA limitations as to how many requests they can process.

New program participants will be covered in the next monthly cycle.

EIV Data Updates (cont.)

- **HHS National Directory of New Hires (NDNH)**
  - **Quarterly Data**
    - **Wages**
    - **UI**
    - **W-4 new hires**
  - **Monthly Data**
    - **W-4 new hires**
    - **All three for**
      - **New program participants since last quarter**
      - **Program participants turning 18 since last quarter**

This is the schedule for data updates that will be implemented in August.

We plan to obtain W-4 data on a monthly basis.

Other data will be updated on a quarterly basis.

However, a complete data set will be obtained for new program entrants and people turning 18.

No IDs will be sent to HHS/OCSE to be matched against NDNH unless they have first been validated by SSA.

EIV Key Functions

- **Household Income Search**
  - by Re-certification month
  - by Head of Household (HOH) SSN
  - by Name & PHA
  - by Name & DOB & PHA
- **Threshold Report**
  - by input Threshold Level & PHA
  - Access to household data more restricted than to summary data
- **Distributed User Activation**
  - Request by PHA User Administrators to assign user roles
  - Approval by FO User Administrators
  - Quarterly attestation of continued need for roles by PHA User Administrators

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There are 3 key EIV factions:

The Household Information page contains detailed income data concerning household members. Access is limited to those who need access to this Privacy Act data. There are two primary ways to access the household data. One is by re-certification date. The other is through one of several combinations of tenant information.

The Threshold Report provides data arrayed by PHA and rolled up the PHAs and then the PIH organizational structure. The Threshold Report also has household data. Access to the household data is limited to the same group as the Household Information page.

Finally, EIV has a distributed system for user administration. PHAs request access in the system and forward applications. Those applications are acted upon by User Administrators in the PIH Field Offices.

EIV Threshold Report

- **Calculates household income discrepancies between income projected by tenant on form HUD-50058 and the prorated EIV income**
- **Excludes households with annual income discrepancy less than $2400.**
- **User searches by percentage of discrepancy.**
- **High discrepancy triggers oversight in RIM review.**
- **Used by HUD IG.**

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The Threshold Report is heavily used. It allows system users to prioritize cases. Although all cases must be worked, PHAs need to know which ones look to have issues. It should be quickly stated that there can be legitimate reasons why a household has a significant discrepancy between predicted and actual income. A person can lose a job, get ill, not get an expected promotion, etc. EIV is not definitive. The data is subject to a time lag and the tenant always has the right to rebut.

The Threshold Report also is used by the PIH Field Offices when overseeing the PHAs and the RIM Reviewers performing on-site audits. It also is used by HUD IG.

EIV Threshold Report

- **Display by the discrepancy percentage threshold level and organization**
- **Re-calculated weekly**
- **A household is eliminated from the TR:**
  - **after a new 50058 submission (Annual or Interim Re-examination) resulting in the annual income discrepancy less than $2400**
  - **and after 3 months lapses to allow for SSA and NDNH updates**

Users enter the percentage of discrepancy and higher that they want to review. Outliers (double the percentage and more are shown as a column on the same report.

SSN Verification

- **Tenant identities are verified against SSA records for a match on SSN, name, and date of birth**
- **If an ID fails validation, no income information is displayed. The reason for failure is displayed instead.**
  - **Displayed on the Household Summary Page**
  - **Displayed on the Household Income Details Page**
- **Validation results will be accessed by PIC for ID cleanup efforts starting in August 2006.**

All tenant IDs are validated through SSA for name, SSN and date of birth..

If a tenant ID fails SSA validation, instead of displaying income data, EIV translates the error code from SSA to give the PHA feedback as to the nature of the problem.

In August, we will begin to give the PIC system access to the SSA ID feedback data..

Single Sign On (SSO)

- **SSO is HUD's security requirement for providing access to HUD systems via a single access point and single User ID and password**

- **HUD's SSO point of entry to applications is WASS (Web Assessment Subsystem)**

- **EIV users will be asked to begin using 'H', 'C', 'M', or 'I' HUD User IDs and login via WASS**
  - **https://www11.hud.gov/HUD_Systems**

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People familiar with the TASS system are going to know the WASS system that is the HUD front-end for PIH and Housing systems.

PIH is in the process of moving EIV users to the use of WASS. That conversion will be completed in time for the August EIV release.

Privacy Act -- Outline

- **Privacy Act Requirements**

- **Overview of Policies and Controls for Securing UIV Data**
  - **Administrative**
  - **Technical**
  - **Physical**

- **Draft HHS MOU**

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EIV data is covered by the Privacy Act. We are very serious about assuring that the data is only used for its intended purpose. EIV security has been reviewed and passed and, as result, EIV has received an Authority to Operate. EIV also recently received a perfect score for security in the HUD budget system ranking process.

Privacy Act Requirements

Whenever HUD or a PHA requests information about a tenant they should ensure that the data is only to be used for its intended purpose:

- **The data is only used for verification of tenant income to determine:**
  - **A tenant's eligibility for participation in a rental assistance program**
  - **The level of assistance that they are entitled to receive**
  - **Disclosure for the above includes disclosure for oversight and monitoring as well as to support IG and GAO audits and investigations.**
- **Data is not routinely disclosed for other purposes.**

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EIV tenant data is to be used for limited purposes only.

Administrative Safeguards

- **Purposes of the administrative safeguards:**

    – **Ensure that access rights, roles, and responsibilities within the agency are appropriately and adequately assigned**

    – **Maintain security-related records**

    – **Maintain records and follow good security practices**

    – **Maintain, communicate, and enforce standard operating procedures related to securing UIV data**

In operating EIV for proper security, we:

•Assure that access rights are only give to those who need it to fulfil the system's purposes and only to the extent that the access is warranted.

•We maintain security related records so that if there is an issue, there is a full record of what transpired. We also assure that good security practices are followed.

•We also maintain and distribute directives on how to secure the EIV system and its data.

Administrative Safeguards, cont'd

- **The EIV system enables the following safeguards for system security of Privacy Act data:**
  - User Administrators (UAs) review requests by PHA UAs
  - UAs must attest to the continuing need for roles by users each quarter or the role will be deactivated by the system after 30 days.
  - All role assignments are logged including UA attestations and system suspension of rights.
  - Each access of a Privacy Act record is logged in a special log.
  - Logs are reviewed on a daily basis.

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This slide describes user security including how requests are handled, how we assure that rights that have been assigned are still needed and how user actions and those of User Administrators are logged

Administrative Safeguards, cont'd

- **Keeping records and maintaining proper security practices**

  - Assure that a copy of Form HUD-9886 (tenant waiver) has been signed by each adult member of the household and is kept in the household file

  - Maintain a key control log to track the inventory of keys available, the number of keys issued and to whom the keys are issued

  - Ensure that all employees and contractors who have been issued keys to secure areas complete a form acknowledging the receipt of the key

  - Destroy copies of covered records in one of the ways prescribed in EIV guidance.

  - All users must sign an application reflecting the EIV Rules of Behavior (ROB). IT staff sign the ROB.

This slide covers record keeping practices.

Administrative Safeguards, cont'd

- **Conducting Security Training**
  - Ensure that all users of UIV data receive training in UIV security policies and procedures at the time of employment and at least annually afterwards
  - Maintain a record of all personnel who have attended training sessions
  - Communicate security information and requirements to appropriate personnel
  - Distribute all User Guides and Security Procedures to personnel using UIV data
  - IT and program staff are to receive training put on by PIH IT and the CIO Emergency Response Team.

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Security training is an ongoing responsibility and must cover all classes of users including the development team.

Technical Safeguards

- **Purposes of the technical safeguards:**

    - **Reduce the risk of a security violation related to the EIV systems' software, network, or applications**

    - **Identify and authenticate all users seeking access to the UIV data**

    - **Deter and detect attempts to access the system without authorization**

    - **Monitor the user activity on the EIV system**

Our technical security practices are intended to deter violations and help detect them if they occur.

Technical Safeguards

- **The technical controls that have been built into the EIV and WASS systems address the following:**

  - **User Identification and Authentication**
    - **Each user is required to have <u>his/her own</u> User ID and Password**
    - **The User ID identifies the PHA(s) or HUD Field Office and tenant information that the user is authorized to access**
    - **Passwords are encrypted and the password file is protected from unauthorized access**
    - **The WASS front-end system forces all users to change their password every 30 days and limits the reuse of previous passwords**

EIV and the WASS system enforce good security by requiring and protecting unique user IDs.

Technical Safeguards, cont'd

- **After three unsuccessful attempts to log into WASS, the User ID is locked.**
- **Password resets are handled by the PIH Technical Assistance Center or in the local HUD Field Office.**
- **Additional information and assistance is made available through EIV Help, eivhelp@hud.gov.**

User assistance is available through PIH User Assistance and EIV Help.

Technical Safeguards, cont'd

Online User Privacy Act warning and consent

- In order to enter EIV, users must first check a box to signify that they understand the Privacy Act warning that is on the same screen.
- Occupation Specialists must check a box saying that HUD Form 9886 is on file for all records to be accessed.

Before being allowed to proceed from the EIV front page, a user must acknowledge the Privacy Act warning on that page and if they are an Occupation Specialist must say that the waiver is on file for all files that are to be reviewed.

Physical Safeguards

- **Purposes of the physical safeguards:**

  - **Provide barriers between unauthorized persons and documents or computer media containing private data**

  - **Prevent undetected entry to protected areas and/or to protected documents**

  - **Provide immediate notification, noticeable under normal operating conditions, if the barrier is penetrated by unauthorized persons**

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Physical security is in place to prevent unauthorized access and to warn if there has been a successful system penetration.

Security Impact of the Agreements with SSA and HHS

- **HUD's agreements with SSA and with HHS/OCSE for NDNH:**
  - Continued data access is dependent on HUD's observance of security standards in agreements
  - Both agencies may audit HUD compliance
  - Access of Housing Program to NDNH data is dependent on demonstrated success by PIH

Both SSA in the existing agreement with HUD and HHS/OCSE in the draft agreement being finalized have stated the importance of HUD observing thorough security and have reserved the right to audit HUD and its partners. HHS/OCSE will only allow Housing Program access to NDNH data once PIH has demonstrated that its security practices have been proper and effective.

User Information

- **UIV User Manual (downloadable from information website as well as application front screen)**
- **PHA Security Procedures directive**
- **Release of Information Privacy Act/Form 9886**
- **Webcasts available on web**

EIV has an excellent User Manual available on the web along with related directives and materials, including slideshows from training broadcasts.

Future Plans

All plans are subject to budget decision making.

- **August 2005 release – implement NDNH for Public Housing programs.**

- **January 2006 release – merge TASS into EIV (begin EIV support for Housing program) plus implement refinements to use of NDNH.**

- **August 2006 – plans and budget not decided. Discussions with HHS will be ongoing. NDNH for Housing?**

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The budget for further development is being determined so there is a degree of uncertainty. It is clear that EIV will absorb TASS and begin to serve the Housing Program. How soon NDNH data will be made available to Housing owners and agents and other users will, in part be determined by HHS/OCSE.