Bonnie Wilpon, COS, STAR
Presents

EIV: Handling Reports and Resolving Discrepancies

PAWA House of Florida, Inc.
Our House is Your House for Training and Service!

Learning Objectives

- List and apply all HUD-required EIV reports in a compliant way
- Identify logical steps to successfully analyze and resolve EIV Income Discrepancy Reports
- Assess the current status of MORs and employ specific strategies for MOR preparation

EIV Update

- EIV works best using Internet Explorer 10
- “EIV Discrepancy Report” unexpectedly showed up as the last item under Verification Reports on the main EIV menu
- This is an error – this report is only for HUD personnel
- There is no requirement to use it & HUD will remove it
EIV Update
- EIV can no longer be used to verify State SSP
- Some states discontinued their SSP (State Supplementary Payments) programs
- SSA no longer maintains SSP data
- Ignore the “State Supplement” amount in EIV
- The tenant can get a verification document from the state SSP office

Using All Required EIV Reports
- There are many EIV Reports and screens
  - HUD-required timeframes for using and printing Reports vary
- Master Files must be kept for...
  - Failed EIV Pre-Screening Report
  - Failed Verification Report
  - New Hires Summary
  - Deceased Tenant Report
  - Multiple Subsidy Summary

Using All Required EIV Reports
- Summaries, with brief notes, are kept in Master Files
- If there’s no report to print, print and file the screen shot to document that
- Detail Reports, verifications and documentation are kept in tenant files
- Reports in Master Files must be kept for three years
- Check your EIV P/P to see if you need to print and keep other reports
Using All Required EIV Reports

- Plan to go into EIV the first week of each month to print routine monthly reports.
- EIV data is confidential to the individual – not the household.
- Use the Tenant Consent to Disclose EIV Income Information for anyone the tenant wants in the room to help during a recert interview.
- The form is done once unless the tenant wants to change it; review it at each Annual.

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Using All Required EIV Reports

- 9887s are required before using EIV data.
- Between the 1st & the 10th, Search By Contract Number.
- Choose the Recertification Month that is 120 days out.
- Know whose ARs are due for the month before you print (# income reports + # of No Income Reported by HHS or SSA should = ARs due).

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Using All Required EIV Reports

- Looking for a report for a particular HH? Search by HH, entering the Head’s SSN.
- Do this for IRs, MIs, ICs & tenants missing reports due to failed identity statuses that you fixed.
- Enter Recert Month “All” before printing the No Income Reported on 50059 and the No Income Reported by HHS or SSA Reports.
- Print all other reports from the Verification Reports Menu on the left-side menu bar.
EIV Income Reports

Income Report
Income Discrepancy
No Income Reported on 50059
No Income Reported by HHS or SSA
New Hires Report

Income Reports Search Screen

Summary List: Tenants with Income Reports
### Income Report Example

#### Income Report Example Continued

**Unemployment Benefits**

<table>
<thead>
<tr>
<th>Pay Period</th>
<th>Amount</th>
<th>Date Received by EY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1 of 2017</td>
<td>$1,000.00</td>
<td>04/13/2017</td>
</tr>
<tr>
<td>Q2 of 2017</td>
<td>$1,000.00</td>
<td>07/13/2017</td>
</tr>
<tr>
<td>Q3 of 2017</td>
<td>$1,000.00</td>
<td>10/13/2017</td>
</tr>
<tr>
<td>Q4 of 2017</td>
<td>$1,000.00</td>
<td>01/13/2018</td>
</tr>
</tbody>
</table>

**Social Security Benefits**

<table>
<thead>
<tr>
<th>Verification Data</th>
<th>Benefit History</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Gross Benefits</td>
</tr>
<tr>
<td>12/31/2017</td>
<td>$1,000.00</td>
</tr>
</tbody>
</table>

### Income Report Example Continued

**Dual Enrollment Verification Data Benefit History**

<table>
<thead>
<tr>
<th>Date</th>
<th>Gross Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/31/2017</td>
<td>$1,000.00</td>
</tr>
</tbody>
</table>

**Medicare Data**

<table>
<thead>
<tr>
<th>Verification Data</th>
<th>Premium Buy-in Buy-in Start Buy-in Stop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>Gross Benefits</td>
</tr>
<tr>
<td>12/31/2017</td>
<td>$1,000.00</td>
</tr>
</tbody>
</table>
Income Report Example Continued

<table>
<thead>
<tr>
<th>Payment Name Code</th>
<th>Federal Amount</th>
<th>State Amount</th>
<th>Type of Payment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Monthly</td>
<td>$100.00</td>
<td>$100.00</td>
<td>Recurring Payment</td>
</tr>
<tr>
<td>Direct Month</td>
<td>$200.00</td>
<td>$200.00</td>
<td>Recurring Payment</td>
</tr>
<tr>
<td>Direct Year</td>
<td>$300.00</td>
<td>$300.00</td>
<td>Recurring Payment</td>
</tr>
</tbody>
</table>

- Should be printed **120 days before ARs**
- Must be used when preparing for ARs
- Required to be printed & reviewed for IRs
- Required to be searched within **90 days** of transmitting a MI or IC, per your EIV P/P
- Compare the Income Report to the cert
- If needed, verify & do a Correction cert within **30 days**

Income Report

- Can be printed for individual people or for the whole household
- Shows the hire date for current jobs and the **last 8 quarters** of wages, unemployment & SS benefits
- Look for a history of unreported or under-reported income and follow up
- Appropriate retroactive certs must go back 5 years or to the MI, whichever is less. Correction certs may need to be completed moving forward from that date
Income Report

- Verify unreported or grossly under-reported income, discuss with tenant & process appropriate retroactive certs.
- The voucher will repay HUD based on the certs; be sure to reverse if the tenant hasn’t repaid the full amount during the voucher month.
- Show/discuss during the recert interview.
- Keep the Income Report in the tenant file with verifications.

When Tenant Agrees

- Use SSA data as third party verification for both the source of income and the amount.
- Do not collect, use or file the Award Letter for income verification purposes.
- Use HHS data as third party verification of the source of income.
- Use tenant-provided pay stubs / employer print-out, unemployment letter, etc. for 50059 calculations.

When SSA Income is Disputed...

- Advise the tenant (in writing) to contact the SSA to request that invalid information be corrected.
- Note, on the EIV Income Report, “Tenant Disputed - Award Letter used instead” – be sure it’s not older than 120 days before it was given to you.
- Keep both in the tenant file.
When HHS Income is Disputed…

- Get third party verification from a source other than the tenant
- When income has been verified, send a 10-day Notice per your EIV P/P
- When the tenant comes in, do appropriate 50059s & repayment agreement
- If the tenant doesn't respond, terminate subsidy - tenant pays market rent as of the 1st of the month after the notice period

When HHS Income is Disputed…

- Can't get third-party verification? Document and...
  - Tenant self-certifies that EIV data is invalid
  - Advise tenant to contact the employer to remove invalid info from their records
  - For unemployment, advise tenant to contact the SWA to have invalid info removed
  - Request that the tenant give you copies of all correspondence

Document, Document, Document

- Without proper third party verification when the tenant disputes NO retroactive certs can be done
- Keep copies of all documents, including your advice to the tenant
- Keep copies of any tenant-provided correspondence
- Keep the Income Report behind the cert along with verifications
Document, Document, Document

- Can’t use the Disability Status on the Income Report as verification of disability since SSA’s standards are different from HUD’s.
- If the Income Report shows no EIV-reportable income, print the page & keep it in the tenant file with other verifications.
- Properties with layered subsidies (Tax Credit) must file EIV Income Reports in a way that non-HUD reviewers can’t see them.

Income Report Showing No EIV-Reportable Income

Income Discrepancy Report

- You’ll get a Discrepancy Report for a household which...
- Has a current, active certification in TRACS, and
- Shows income that’s different from the active cert by $2400 or more, for the POI.
- It’s an alert that there MAY BE incorrect income on the discrepant cert.
- Discrepancy Report is about the HH’s current cert sitting in TRACS – not the cert you’re working on when you print it.
Income Discrepancy Report

- Must be used for all ARs and IRs
- Print and examine 120 days prior to AR and
- When processing an IR
- You can only use it at other times IF described in your EIV Policies & Procedures
- Print and file “No Discrepancy Report”

Make sure that the active cert in TRACS (discrepant cert) is the tenant’s current cert
You must resolve the Discrepancy Report...
- During the recert interview it was printed for, or
- Within 30 days of printing it.
- This is an “either-or” not a “whichever comes first”

Documentation of No Discrepancy Report
Resolving the Income Discrepancy Report

You may be able to resolve by examining the tenant file:
- You may find unreported / under-reported income, and the tenant may have to repay prior HUD assistance.
- You may find management error and the property may have to repay prior HUD assistance.

Resolving the Income Discrepancy Report

You may find that the tenant reported too much income, causing too little HUD assistance. If the tenant didn’t report an income decrease and requests an IR, process an IR effective the 1st of the month after the discrepancy resolution. If there was management error, the tenant needs a retro cert and a refund.

Income Discrepancy Report

<table>
<thead>
<tr>
<th>Source</th>
<th>Income Report</th>
<th>Discrepancy Report</th>
<th>Govt. OMB Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>EMAIL</td>
<td>EMAIL</td>
<td>EMAIL</td>
</tr>
<tr>
<td>Social Security Number</td>
<td><em><strong>-</strong></em>-1234</td>
<td><em><strong>-</strong></em>-1234</td>
<td><em><strong>-</strong></em>-1234</td>
</tr>
<tr>
<td>Contract Number</td>
<td>12345678</td>
<td>12345678</td>
<td>12345678</td>
</tr>
<tr>
<td>Project</td>
<td>Happy Homes</td>
<td>Happy Homes</td>
<td>Happy Homes</td>
</tr>
<tr>
<td>Tenant Name:</td>
<td>John Doe</td>
<td>John Doe</td>
<td>John Doe</td>
</tr>
<tr>
<td>Date of Discrepancy:</td>
<td>01/01/2016</td>
<td>01/01/2016</td>
<td>01/01/2016</td>
</tr>
<tr>
<td>Projected Annual Income and Benefits From Form 8824:</td>
<td>$45,000</td>
<td>$45,000</td>
<td>$45,000</td>
</tr>
<tr>
<td>Projected 12 Income for Discrepancy Analysis:</td>
<td>$45,000</td>
<td>$45,000</td>
<td>$45,000</td>
</tr>
<tr>
<td>Discrepancy Amount:</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
</tr>
<tr>
<td>Normalized Loss</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
</tr>
</tbody>
</table>

Note: If the tenant did not report or under-reported income, please process the income discrepancy with the original. If the tenant reported a decrease in income, process the retro cert and refund accordingly.
Income Discrepancy Report

Note

Resolving the Income Discrepancy Report

- Is the discrepant cert truly the tenant's current cert, or is there a more recent cert TRACS doesn't have?
- If TRACS doesn't have the current cert, transmit it
- After it shows in the Tenant Query, and a weekend has passed, print another Income Report / Income Discrepancy Report
- There might not be a Discrepancy Report

Resolving the Income Discrepancy Report

- Compare the “Wages & Benefits from 50059” on the Discrepancy Report, to the income shown on the 50059 in the tenant file
- The “Wages & Benefits” number should equal the sum of all the income on the cert that EIV could see
- Incorrect income codes may cause EIV to be unable to “see” all the income on the 50059
Resolving the Income Discrepancy Report

- Next, identify why EIV thinks the income on the current cert in TRACS wasn’t right
- Compare the 50059 & verifications to the EIV Income Report
  - Check for excluded income
  - Look ONLY at income during the POI
  - Check the math from verifications

Resolving the Income Discrepancy Report

If you know why EIV saw a discrepancy, but the certification was done right, mark the Discrepancy Report “Resolved” and explain
- EIV might have included income that should be excluded (so you left it off the 50059)
- Verifications might have been proper and the calculations were correct - but the tenant had irregular income spikes that caused EIV to show $2400+ more than the cert showed
- EIV may have annualized income that didn’t last a year, falsely inflating it

Resolving the Income Discrepancy Report

- If the 50059 was wrong, retroactive recerts and/or Corrections must be completed
- Use the “If I knew then what I know now” test, to determine which certs are required
- You must do the certs that should have been done if you would have had the correct info at the time
- It’s not compliant to just correct the last AR to show the right annualized income
Resolving the Income Discrepancy Report

- If you still can’t figure it out, discuss it with the tenant.
- Even if the tenant agrees with the source and amount of the income, you cannot use the dollars from the Income Report for the cert – you MUST have proper verification.
- Tenant-provided third party verification cannot be used when resolving Discrepancy Reports.

Resolving the Income Discrepancy Report

- If the tenant disputes the source or dollars shown on the Income Report…
- … you must get third party verification provided by a source other than the tenant to take any action.
- Once verified, give the tenant a 10-day notice (Exhibit 7-7) and process appropriate certs.
  - You must go back 5 years or to the MI, whichever is less.
  - The tenant will owe HUD for all overpaid assistance.

Resolving the Income Discrepancy Report

What if the tenant disputes and you can’t get proper verification?

- Tenant must come to the office and self-certify that EIV data is invalid.
- Statement must be signed & dated by the HH & kept in the tenant file with the Discrepancy.
- Follow the same “advice procedure” as noted for the Income Report.
- Advice must be in writing.
Resolving the Income Discrepancy Report

- Tenant doesn't respond to the 10-day Notice? HH must pay market rent beginning the 1st of the month following the Notice period.
- If the tenant is in lease non-compliance (i.e. knowingly provided inaccurate information), you must evict, and file a civil action to recover overpaid subsidy.
- Follow your EIV P/P and consult with your home office.

Identity Theft and Fraud

- Incorrect EIV information could mean identity theft! Advise tenants (in writing) to:
  - Contact the SSA to verify their records
  - File an identity theft complaint with the FTC
  - Place a fraud alert on their credit reports with the 3 national credit reporting agencies
  - File a police report – identity theft is a crime.

Identity Theft and Fraud

- Suspect fraud?
  - Follow your EIV P/P in terms of contacting HUD’s OIG (Office of Investigation)
  - The OIG office may ask you to delay or refrain from doing a repayment agreement.
No Income Reported on 50059

<table>
<thead>
<tr>
<th>No Income Reported on 50059</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shows households who have no income at all on their current 50059s in TRACS</td>
</tr>
<tr>
<td>HUD requires that you run it for All Tenants and use it as described in your EIV Policies &amp; Procedures</td>
</tr>
<tr>
<td>The Report can help identify zero income households</td>
</tr>
<tr>
<td>HUD encourages the use of zero-income questionnaires quarterly</td>
</tr>
</tbody>
</table>

Slide 47
No Income Reported by HHS or SSA

- Shows households who have no EIV-reportable income in the current computerized match with HHS and SSA
- HUD requires that you run it for All Tenants and use/print it as described in your EIV Policies & Procedures
- This report can alert you to tenants who had wages, SS or unemployment on the last cert but lost it

New Hires Report

- Print it from the blue menu bar under Verification Reports so it defaults to All Tenants (not from the Income Reports Search Screen)
- Per your EIV P/P print it monthly, every other month or quarterly
- The New Hires Report shows people who have gotten new jobs in the last 6 months
- Data comes from W4s

New Hires Report Summary
New Hires Report Summary

- Make brief notes for each name on the Summary, i.e.
  - “Unreported income; IR being done”
  - “Tenant hired, then fired 1 week later”

New Hires Report: Detail

Enterprise Income Verification

Income Information
- Tax Credit and Director = Classic Summary = New Hires Report

New Hires Data
- Name: John Smith
- Address: 123 Main St
- Phone: 555-1234
- Date of Birth: 01/01/1970
- Social Security Number: 123-45-6789
- Approval Code: 12345
- New Hires Number: N1234567
- Approval Date: 01/01/2023

New Hires Report
- Tenants: John Smith
- Tenants ID Number: 123-45-6789
- Tenants Address: 123 Main St
- Tenants Phone: 555-1234
- Tenants Date of Birth: 01/01/1970
- Tenants Social Security Number: 123-45-6789

New Hires Report
- Tenants ID Number: 123-45-6789
- Tenants Address: 123 Main St
- Tenants Phone: 555-1234
- Tenants Date of Birth: 01/01/1970
- Tenants Social Security Number: 123-45-6789
- Approval Code: 12345
- New Hires Number: N1234567
- Approval Date: 01/01/2023

New Hires Report

- Contact the tenant to confirm the new job
- If the tenant does not dispute, collect 4-6 current, consecutive pay stubs or get employer verification to calculate the amount for the IR if an IR is needed
- If the HH disputes you must get third party verification from a source other than the tenant
- Keep the New Hires Detail Report in the tenant file with all documentation, behind the appropriate cert
Non-Income Reports

- These don’t show data provided by HHS so they can be seen by Tax Credit file auditors.
- When there are no tenants on the report the EIV screen will show a zero.
- Print that screen for the Master File to document that you checked for the report.
- Reports in the Tenant Files must be kept for the term of tenancy plus three years.
- Reports in the Master Files must be kept for three years.

Non-Income Reports

<table>
<thead>
<tr>
<th>Year</th>
<th>Name</th>
<th>Social Security Number</th>
<th>Date of Birth</th>
<th>Income</th>
<th>Room</th>
<th>Payment History</th>
<th>Expiration</th>
<th>Termination Cause</th>
<th>Note</th>
</tr>
</thead>
</table>

“Income” Summary Report

- The month and day values in the Date of Birth field have been masked for security reasons.

<table>
<thead>
<tr>
<th>Name</th>
<th>Social Security Number</th>
<th>Date of Birth</th>
<th>Income</th>
<th>Room</th>
<th>Payment History</th>
<th>Expiration</th>
<th>Termination Cause</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Smith</td>
<td>1234567890</td>
<td>01/01/1980</td>
<td>$5000</td>
<td>$750</td>
<td>2015-2017</td>
<td>2018-2020</td>
<td>Tenancy Expired</td>
<td>None</td>
</tr>
</tbody>
</table>
Summary Report

- Print for tenant file when new or when verification status is different from the last one
- **Document Exceptions:**
  - HH members age 62+ as of 1/31/10: exempt seniors stay exempt, even if they move to another HUD property
  - **Ineligible non-citizens,** since they’re not assisted
  - **Children under 6** whose SSN was applied for but not yet received: parents have 90 days to provide it; you can extend another 90 days

4 Verification Statuses

- **Verified:** The HUD-required SSN verification
- **Failed:** Do IRs/Corrections to correct the information
- **Deceased:** Do IRs/Corrections/Move-Outs as needed
- **Not Verified:** SSA validation is in process or can’t be done; no fixes are possible or required

Identity Verification Reports

- The Identity Verification Reports screen shows the number of tenants appearing on each of the three reports
- When a report shows zero tenants for a report, print the screen shot for the Master File
- When a tenant appears on any of these, EIV won’t give you any information for that person
Identity Verification (Failed) Reports

Identity Verification Reports

Pending Verification Report:
Household member is in the process of being verified by the SSA
Use it as described in your EIV Policies & Procedures; no HUD requirements
Identity Verification (Failed) Reports

- **Failed EIV Pre-Screening Report:** One or more of the tenant’s identifiers (Name, Birthdate, SSN) was so far off that EIV couldn’t send them to the SSA

- **Failed Verification Report:** EIV sent identifiers to the SSA... but SSA couldn’t find a person with those three identifiers in its system

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Identity Verification (Failed) Reports

- Print both reports monthly for All Tenants
- Verify all identifiers - last name, birth date and SSN - because the check is not sequential
- Transmit a Correction to fix them within 30 days
- Complete Previous Head Fields if the identifiers are for the Head of Household
- Check EIV the next month (search by HH)

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Identity Verification (Failed) Reports

- Consider delaying the AR interview until you get EIV data or until you can’t wait any longer
- Transmitting Correction certs as you do them will speed up getting EIV Reports
- Do not change any identifiers for the Head of Household on a retroactive cert - it might corrupt the tenant’s TRACS file and lower your compliance percentage
Failed EIV Pre-Screening

- Shows which identifiers don’t match SSA’s database and sometimes provides what SSA shows.
- If the 50059 is right and SSA is wrong give the tenant the SS5 form for them to submit to the SSA.
- “Last call” for tenant data to be included in the 20th-of-the-month data drop is the first Monday of the month.
Multiple Subsidy Report Summary

- Print per your EIV P/P (monthly, every other month or quarterly)
- Choose All Household Members
- Keep the Summary, with notes, in the Master Files
- Discuss with tenant as needed and document
- Discuss with the other site if needed – one may need to do an IR, termination or evict
- Keep the Detail Report & documentation in the tenant file

Multiple Subsidy Report Detail

- Enterprise Income Verification
  - Verification Requirements
  - Multiple Subsidy Report
  - Report Instructions

- Multiple Subsidy Report
  - 1-3 or 5 Members
  - Print per your EIV P/P (monthly, every other month or quarterly)
  - Choose All Household Members
  - Keep the Summary, with notes, in the Master Files
  - Discuss with tenant as needed and document
  - Discuss with the other site if needed – one may need to do an IR, termination or evict
  - Keep the Detail Report & documentation in the tenant file

Multiple Subsidy Report

- Print per your EIV P/P (monthly, every other month or quarterly)
- Choose All Household Members
- Keep the Summary, with notes, in the Master Files
- Discuss with tenant as needed and document
- Discuss with the other site if needed – one may need to do an IR, termination or evict
- Keep the Detail Report & documentation in the tenant file

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Deceased Tenant Report

- Print per your EIV P/P (monthly, every other month or quarterly)
- If needed, confirm (in writing) with next of kin, whether the tenant has died
- Process appropriate MO or IR within 30 days
- Any overpaid subsidy must be repaid to HUD
- Keep the Report, with notes, in the Master File
- Keep any documentation in the tenant file

Existing Tenant Search

- Enter EIV Runtine
- Select Tenant Search
- Search by SSN or Name
- Access Information
- Select Tenant
- View Information
- Update Information
- Change Status
- Print Report

- Use for verification, renewal, etc.
Existing Tenant Search

- Required as part of final screening before offering a unit or adding a new HH member – including a Live-In Aide
- Describe its use in your Tenant Selection Plan
- Print a Report for every household member
- Coordinate Move Out/Move In dates with the other site
- Keep with the application in the tenant file
- If not admitted, keep with application for 3 years

Bonnie Wilpon, COS, STAR
Presents

MORs: The Return of Management & Occupancy Reviews

PAWA House of Florida, Inc.
Our House is Your House for Training and Service!

MORs: The Return

- HUD sent contract extensions to PBCAs that can be renewed until 12/31/17
- Limited funding is available for them to do MORs
- HUD has identified which properties they want to have MORs this year
MORs: The Return

- PBCAs determine how many of those MORs they can do in 2016
- PBCAs can ask to do additional MORs – up to 100% of their properties
- They submit their Work Plans to HUD for approval based on funds availability
- HUD plans to ask Congress for more funds to do additional MORs in 2017
- North Tampa/CGI has already resumed MORs

MORs: The Return

- Form 9834 was substantially changed 11/30/12
- On 5/13/16 an update with a new expiration date (4/30/18) appeared in HUD Clips
- Use the 9834 to do a “mock MOR” to prepare for the real thing

7 Categories are Rated

1. General appearance and security
2. Follow-up on REAC and lead-based paint inspections (suspended under extensions)
3. Maintenance and operating procedures related to vacancy, turnover and energy conservation
4. Financial management, including budget, cash, cost and purchasing controls; receivables and payables; bookkeeping (CAs do not rate this)
7 Categories are Rated

5. Leasing and occupancy:
   - Tenant selection
   - Processing applications
   - Leases
   - Security deposits
   - Terminations and evictions
   - TRACS compliance
   - Security of files
   - Tenant file reviews

7 Categories are Rated

6. Tenant/management relations: grievances, complaints and services provided to tenants

7. General management practices:
   - Operating procedures & personnel practices
   - O/A participation for sites with HUD mortgages

NOTE: Under the contract extensions PBCAs in the 42 contested states will not be doing Fair Housing, 504 or REAC follow-up although these items are noted on the latest Form 9834

Rating System

Each of the 7 categories counts for a percent of the overall rating

General Appearance and Security: 10%
Follow-up/Monitoring of Inspections 10%
Maintenance and SOPs 10%
Financial Mgt/Procurement 25%
Leasing and Occupancy 25%
Tenant/Mgt Relations 10%
General Management Practices 10%
Rating System

**Superior:** 90-100: Consistently exceeds statutory, regulatory, and Handbook requirements

**Above average:** 80-89: Actions occasionally exceed the above requirements

**Satisfactory:** 70-79: Actions meet statutory, regulatory and Handbook requirements

**Below Average:** 60-69: Actions rarely meet statutory, regulatory and Handbook requirements

**Unsatisfactory:** 59 and under: Actions did not meet the requirements above

Review Reports the Reviewer Will Look At

- Reviewer may look at TRACS reports in Secure Systems such as:
  - Tenant/Late Certification Query
  - TRACS/Voucher/Voucher Query/Compliance Percent
  - Tenant/Project Evaluation Query showing changes in assets, tenants without income, elderly without medical & exceptions from minimum rent
  - Tenant/Certifications with Discrepancies Query

These reports may help the reviewer choose which tenant files to review

- Review them yourself first, and examine tenant files that seem to have issues
MORs and EIV

- The biggest 2012 revision to the 9834 was to add all EIV requirements to the MOR
- You’ll have Findings if you’re not following EIV requirements or if your EIV Policies and Procedures are missing or out of date

MORs and EIV

- EIV violations can be identified during MORs and at other times such as during an audit or due to a tenant complaint
- Penalties
  - Detailed audit of 100% of tenant files
  - All errors must be corrected back to the date of the error
  - Repayment agreements will be required

MORs and EIV

- Management error? Management absorbs the HUD overpayments...
  - ... and the tenant gets a 30-day notice of a rent increase
- 5% of the voucher total can be removed
- Property and management company may be flagged in APPS
  - Can prevent management from getting new properties and keeping the properties it has
- Voucher penalty and APPS flag last until the violation is cured
MORs and EIV

- Your EIV Policies & Procedures spell out how and when you print & use EIV data
- Follow your Policies and Procedures document exactly!
- It’s just as bad to do too much as it is to do too little!

MORs and EIV

- Reports in Master Files must be tabbed by report name - not by date – and kept for 3 years
- Your EIV P/P may require you to print and file additional reports in the Master Files too

MORs and EIV

- Your on-site EIV file must contain...
  - For Coordinators: Owner authorization letter, initial and current approved CAAFs
  - For Users: Initial and current approved UAAFs
  - Signed/dated ROBs for people who don’t have access to EIV data online but need to see it
  - Note: Independent Public Auditors can see EIV documents when auditing tenant files - they can’t remove them from the office or scan them to a mobile device
**MORs and EIV**

- If required forms aren’t in your onsite EIV file the reviewer must expire your access until the Finding is closed.
- We recommend that this file also contain:
  - Updated list of Coordinators & Users showing the dates they were added and/or removed if you have high turnover.
  - Documentation of EIV training.
  - Current, unexpired CyberAwareness Course certificates.

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**MORs and EIV**

- EIV’s Annual Security Training requirement is different from the online security exam that used to be in EIV.
- Coordinators, Users and employees of the O/A who sign Rules of Behavior must complete the online CyberAwareness Challenge each year – passing this course is the annual EIV Security Training requirement.
- Be sure to print the certificate of completion, with your name and the date.
- Be sure to use Internet Explorer!

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**Tenant File Review**

- Tenant files must be secured in locked file cabinets, in a lockable area (if possible).
- Have a list of people who have access.
  - Files sampled will include a MI, a recert, a rejected applicant file and a TM or MO.
  - Rejection letters will be reviewed to be sure the reason(s) for rejection is clearly and specifically stated.
Tenant File Review
Tenant files: required documentation...

- All certs (with verifications) for the past year
- Manual worksheet showing train of thought
- Signed acknowledgements and/or copies showing that the tenant received the required forms/brochures at ARs
- Acknowledgement sheets should have a line for each form showing the tenant signature and date
- If errors are found the reviewer will audit that file as far back as the problem existed

Tenant File Review

- Forms must be the most current available in HUD Clips at the time they were signed
- If you used an outdated form, have the tenant sign a new one with the current date and attach it to the outdated form
- If a form expired and a new one isn’t out yet, continue to use the expired one until a new one is released

Tenant File Review

**TIPS:**

- Mock file reviews are the best preparation
- MI and current certs: Double-check the math; make sure verifications and EIV are present
- Have an accurate EIV Summary (showing identity verification status) in each file
- Lease addenda must be signed & attached to the lease
### Tenant File Review

**TIPS:**
- Repayment Agreements must have all required items, and every recert associated with them must be in the tenant file.
- Avoid duplication.
- Don’t have conflicting information in the file.
- File the verifications that justify the dollars on the 50059s below each cert, in order.
- Be prepared to quickly get stored files if requested.

### Hints and Tips...

- Have an MOR Binder that contains all required paperwork/forms in order.
- Provide a quiet place to work.
- Be positive & pleasant.
- Answer questions confidently.
- Someone who really understands HUD regs and site policies should be present.