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## EIV Policies and Procedures

### Order Form

Full implementation of EIV was mandatory January 31, 2010, and HUD requires that each site have written EIV Policies and Procedures. These policies and procedures are compliant with the HUD Handbook 4350.3 REV-1 CHG-4, issued August 7, 2013, and most recently HUD's HOTMA Final Rule which allows for discretionary use of certain EIV reports. There are 21 elements that a HUD MOR reviewer will be verifying to determine EIV compliance with HUD regulations. Don't be caught off guard with outdated, non-compliant EIV Policies and Procedures! During a phone consultation, we will discuss specific items to personalize our template to fit your property's needs. For example, how often do you print the New Hires / Multiple Subsidy / Deceased Tenant Master reports or how do you currently use the No Income reported on 50059 and No Income reported in HHS or SSA reports?

**Our EIV Policies & Procedures meet all HUD requirements**, including Privacy Act compliance, requirement for tenants turning 18 between certs to sign the 9887, security, report retention in tenant and master files, use of all EIV reports, including any discretionary policies adopted as authorized under HOTMA.

#### Contact Information

**SEND TO:**

First/Last Name

Title

Phone

Email

Management Company Name

#### Information to Appear on EIV Policies and Procedures

Property Name

Contract or Project #

Property Street Address

City/State/Zip Code

Property Phone

Product	QTY	Price	Subtotal	Payment Method
EIV Policies & Procedures	1	\$450.00	\$450.00	<div><input type="checkbox"/> <b>Check:</b> Mail your check and completed order form to:  <b>PMCS Inc.</b> <b>500 Plum Street, Suite 320</b> <b>Syracuse, NY 13204</b>  Please reference: <i><b><u>“Property Name – EIV Policy”</u></b></i> on memo line of check  <input type="checkbox"/> <b>PayPal:</b> Email your completed order form to:  <b>solutions@pmcsinc.com</b>  <b>An invoice containing PayPal payment link will be emailed to you to pay by credit card. No PayPal account needed.</b></div>
<b>Rush Order Fee:</b> <i>Priority scheduling within 10 business days contingent upon client response time.</i>		\$150.00		
Total Enclosed:				
Questions? Please call us at: <b>800-245-PMCS (7627) x 1517</b>				

**NOTE:** We perform our services using our extensive industry knowledge, contacts, and experience acquired over the more than 35 years we have served the Affordable Housing Industry. The services detailed in our contract do not in any way imply or guarantee that your Contract Administrator and/or HUD will not have questions, 'findings', or 'observations' in your Management & Occupancy Review Report. Due to inconsistencies and policy directives from HUD that are unclear or appear contradictory and the resulting myriad interpretations that exist within the Affordable Housing Industry, the variability in citations/comments is beyond anyone's control. Prices subject to change without notice.

#### For Office Use Only:

Sent By:	Date:	Rec'd By:	Rec'd Date:	DASS:	Tasks:
CK/PP#:			Amount:		Docview:

# EIV Policy Information Sheet

Property Name: \_\_\_\_\_  
Contract Number: \_\_\_\_\_ Project Number: \_\_\_\_\_  
Proposed Effective Date of Policy: \_\_\_\_\_

## For Office Use Only:

Date Sent: N/A

Date Received: \_\_\_\_\_

Thank you for choosing PMCS to create and/or update your property's EIV Policy and Procedures manual. We look forward to working with you on these important policy updates.

- Please read the information below and choose an answer to the questions listed below and in the table on the last page.
- Notes specific to each EIV report are listed below to help you make decisions on how EIV reports will be run.
- We are happy to help you determine your best option or to answer any additional questions you have about EIV report printing or any other compliance issues you have but any time outside of us creating the policy will be billable time.
- All questions must be answered prior to sending this form back to PMCS.

## CONSENT AND AUTHORIZATION FOR THE RELEASE OF INFORMATION – Requirements changed under HOTMA

Under the HOTMA Final Rule, consent form HUD 9887/9887A changed and will remain in effect until the family is denied assistance, assistance is terminated, or the family provides written notification revoking previously provided consent. Families have the right to revoke consent, however revoking consent limits the Owner/Agent's ability to obtain verification and process Annual and Interim Certifications and may result in termination or denial of assistance if written policy exists. Written policy that revocation of consent will result in either of the options below, for existing families, must be identified in the TSP.

Will revocation of consent result in? ☐ Termination of assistance for existing families ☐ Allowing family to reside in unit at current level of assistance and require family to sign a new HUD 9887/9887A prior to processing a future IR or AR

## EIV INCOME SUMMARY, INCOME DETAIL, AND DISCREPANCY REPORTS – Requirements changed under HOTMA

The HOTMA Final Rule changed the timeframe for running the Income Summary and Income Detail reports. Originally the report was to be run when EIV Income Reports were run 90 days after Move-in, Initial Certification, or within 90 days of adding new household members on an Interim or Annual Certification. The timeframe to run the Income Discrepancy report was changed to 120 days after Move-In, Initial Certification, or Interim Certification (when adding new members) under the HOTMA Final Rule.

Is the property utilizing the Safe Harbor discretionary process of accepting verification of income from other "means-tested" federal programs or federal forms of assistance (i.e., Public Assistance, TANF, Medicaid, WIC, LIHTC TIC, etc.)? ☐ Yes ☐ No

If Yes, the Tenant Selection Plan must state that Safe Harbor rule is being utilized, and the EIV Policy will state that EIV income reports and EIV New Hires Report are not required to be run at time of Interim or Annual Recertification when Safe Harbor rule is used under the HOTMA Final Rule as described in the Tenant Selection Plan.

The HOTMA Final Rule eliminates the requirement to use the EIV income reports at time of Interim Certification and allows the use of EIV income report to be a discretionary practice when conducting Interim Certifications as described in the Tenant Selection Plan (TSP).

Will the EIV income reports be run, printed, and used when conducting Interim Certifications? ☐ Yes ☐ No

### Income Discrepancy Report within 120 days of MI / IC / IR transmission to TRACS

The HOTMA Final Rule changed the timeframe for running the report. Originally the Discrepancy report was to be run when EIV Income Reports were run 90 days after Move-in, Initial Certification or within 90 days of adding new household members on an Interim or Annual Certification. The timeframe to run the Income Discrepancy report was changed to 120 days under the HOTMA Final Rule.

Owners are not required to use the EIV Income Discrepancy Report at Annual Recertification if they used Safe Harbor verification to determine the family's income at the last reexamination.

HUD is reprogramming the logic for the Income Discrepancy report. Once the property's compliance software is HOTMA compliant, and new leases have been signed, Owners will not be required to research and resolve Income Discrepancies in the Discrepancy Report until HUD notifies the industry that the report logic has been implemented and the Income Discrepancy Reports are ready for use.



# EIV Policy Information Sheet

## EIV NEW HIRES REPORT - Requirements changed under HOTMA

The HUD requirement to run, print and store the New Hires reports changed under the HOTMA Final Rule. Under the HOTMA Final Rule, the New Hires report is required to be run at Annual Recertification, unless the Safe Harbor Rule discretionary process is used. Additionally, under HOTMA, Owners who adopt policies to not include earned income increases in determining whether the ten percent threshold is met for increases in adjusted income when the family previously had an interim reexamination performed for a decrease in annual adjusted income (earned, unearned, or combined) since the last annual reexamination, are not required to use the EIV New Hires report between annual reexaminations.

Do you require tenants to undergo Interim Recertification for income increases after an Interim Certification for an income decrease was previously processed? ☐ Yes ☐ No

If Yes, New Hires report must be reviewed quarterly after the family's IR was processed for a decrease in annual adjusted income. If No, Report is not reviewed between Annual Recertification.

Previously, HUD required the New Hires reports be printed *at least quarterly*.

The New Hires Summary and Detail Report identifies individuals who have started employment and earning W-2 wages within the last six months.

The New Hires Summary Reports must be run at least quarterly, printed, and stored in the EIV Master Binder along with notes to indicate research and resolution, unless Safe Harbor rule is used.

The New Hires Detail Reports must be run with the New Hires Summary Report, and the New Hires Detail Report containing household member detailed employment information must be printed and stored in the tenant file along with notes and applicable documentation/verification forms to indicate research and resolution. You must have all information collected in order to resolve each household's New Hire with the Master Detail report in that tenants file. There is no 30-day requirement to resolve New Hire items. **(4350.3, REV-1, Change 4, 9-11, D.1.c)**

We recommend that this report is printed quarterly (Jan/Apr/Jul/Oct) to allow ample time to resolve each item in a timely manner. However, you may choose to print it monthly if you prefer more consistent scheduling.

Please indicate the frequency the New Hires Reports will be run: ☐ Quarterly ☐ Monthly

## EIV MULTIPLE SUBSIDY REPORT - Requirements did not change under HOTMA

HUD requires the Multiple Subsidy reports be printed *at least quarterly* which did not change under HOTMA Final Rule.

The Multiple Subsidy report identifies individuals who may be receiving multiple forms of HUD rental subsidies in multiple locations.

The Multiple Subsidy Summary and Detail Report (*if applicable*) must be run at least quarterly. The Multiple Subsidy Summary Report must be printed and stored in the EIV Master Binder. Owner/Agents must follow up with tenants identified on the Multiple Subsidy report. Multiple Subsidy Detail reports must be printed, annotated with notes detailing steps taken to resolve the multiple subsidy discrepancy and retained in the tenant file. **(4350.3, REV-1, Change 4, 9-12, B.)**

We recommend that this report is printed quarterly (Jan/Apr/Jul/Oct) to allow ample time to resolve each item in a timely manner. However, you may choose to print it monthly if you prefer more consistent scheduling.

Please indicate the frequency the Multiple Subsidy report will be run: ☐ Quarterly ☐ Monthly

# EIV Policy Information Sheet

## EIV DECEASED TENANTS REPORT - Requirements did not change under HOTMA

HUD requires the Deceased Tenants report be printed *at least quarterly*.

This report identifies individuals who are reported by SSA as being deceased.

The Deceased Tenants Report must be run at least quarterly, printed, and stored in the EIV Master Binder. Owner/Agents must follow up with tenants identified in the Deceased Tenants Report. Reports must be annotated with notes detailing steps taken to document the research and steps taken to resolve the discrepancy. In addition to printing and storing in the EIV Master Binder, if the Deceased Tenants Report identifies deceased individuals, the report should be printed and a copy retained with documentation to support any action taken, in tenant file. **(4350.3, REV-1, Change 4, 9-12, B.)**

We recommend that this report is printed quarterly (Jan/Apr/Jul/Oct) to allow ample time to resolve each item in a timely manner. However, you may choose to print it monthly if you prefer more consistent scheduling.

Please indicate the frequency the Deceased Tenants report will be run: ☐ Quarterly ☐ Monthly

## EIV NO INCOME REPORTED ON 50059 REPORT - Requirements did not change under HOTMA

Owners must show how they will use this report to identify tenants not reporting income on their last certification and have a system in place to re-verify the status of tenants reporting zero income on the last certification. *There is no requirement to print this report.* **(4350.3, REV-1, Change 4, 9-8, A, and 9-11, D.1)**

We recommend this report not be printed or filed. By default, our EIV Policy states this report will not be printed or filed. The EIV Policy will identify this report will be visually reviewed to verify that an Income Summary, Income Detail, and Income Discrepancy report has been printed for households due to recertify in 120 days. You may choose to print this report if you wish.

Please indicate if the No Income Reported on 50059 report will be printed: ☐ Yes ☐ No

## EIV NO INCOME REPORTED BY HHS OR SSA REPORT - Requirements did not change under HOTMA

Owners must document how they will use this report to identify tenants in which EIV reports there is no income. *There is no HUD requirement to print this report.* **(4350.3, REV-1, Change 4, 9-11, D.1.b.)**

We recommend this report not be printed or filed. By default, our EIV Policy states this report will not be printed or filed. The EIV Policy will identify this report will be visually reviewed to verify that an Income Summary, Income Detail, and Income Discrepancy report has been printed for households due to recertify in 120 days. You may choose to print this report if you wish.

Please indicate if the No Income Reported by HHS or SSA report will be printed: ☐ Yes ☐ No

## ZERO INCOME QUESTIONNAIRE - Requirements did not change under HOTMA

We recommend that you provide a zero-income questionnaire to households in which any member 18+ is reporting zero income. We recommend that this be provided at the time of annual recertification. You may choose to require this form for all households with any member 18+ reporting zero income quarterly.

# EIV Policy Information Sheet

## EIV PENDING VERIFICATION REPORT - Requirements did not change under HOTMA

HUD does not require the use of the Pending Verification report (there is currently no language in the 4350.3, REV-1, Change 4 or HOTMA Final Rule).

This report lists individuals with an identity verification status of "Not Verified" and there is no further action required with this type of status.

We recommend this report not be printed or filed since no action is required for any individual on this report. Individuals listed in this report who end up with a Failed or Deceased status will be listed on other EIV reports. By default, our EIV Policy states this report will not be printed or filed. However, you may choose to print this report quarterly or monthly if you wish. If printed, it must be retained in the tenant file.

Please indicate if the Pending Verification Report will be printed: ☐ Yes ☐ No

## EIV CERTIFICATION PAGE - Requirements did not change under HOTMA

HUD does not require the use of the Certification page. We recommend this report not be printed or filed, as there is no value to this report, and it is one more piece of paper to be printed and stored in the tenant file. However, you may choose to print this report if you wish, with the income reports that are run and printed. If printed, it must be retained in the tenant file.

Please indicate if the Certification page will be printed: ☐ Yes ☐ No

**\*\*Please note that the Failed EIV Pre-Screening Report and Failed Verification Report are not mentioned in the reports above and the table below because HUD requires they be printed monthly – you do not have any options.**

## SUMMARY TABLE OF EIV REPORTS AND PRINTING FREQUENCY

EIV REPORT QUESTIONS	PRINTING OPTIONS
Is Safe-Harbor income verification method being used?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Income Reports used for Interim Certifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Income Discrepancy Report 120 days after MI	<input type="checkbox"/> Not Printed <input type="checkbox"/> Printed
New Hires Master Report	<input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly
Multiple Subsidy Master Report	<input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly
Deceased Tenants Master Report	<input type="checkbox"/> Quarterly <input type="checkbox"/> Monthly
No Income on 50059	<input type="checkbox"/> Not Printed <input type="checkbox"/> Printed Monthly
No Income Reported by HHS / SSA	<input type="checkbox"/> Not Printed <input type="checkbox"/> Printed Monthly
Zero Income Questionnaire	<input type="checkbox"/> Provided at recert for households reporting zero income <input type="checkbox"/> Provided quarterly for households reporting zero income
Pending Verification Report	<input type="checkbox"/> Not Printed <input type="checkbox"/> Printed Monthly <input type="checkbox"/> Printed Quarterly
Certification Page	<input type="checkbox"/> Not Printed <input type="checkbox"/> Printed at time Income Report is printed