

VERIFICATION PROCEDURES

Overview

The verification process during the time of application, interim reexamination and annual reexamination is a critical task in the administration of the Public Housing Program and the Housing Choice Voucher Program. This task requires the PHA to verify factors that affect the determination of an applicant's/resident's eligibility and family income. The verification process also requires the applicant/resident to provide and disclose information that is true and complete, which is necessary in the administration of the Public Housing and Housing Choice Voucher Programs.

The PHA is the final judge of what constitutes adequate and credible documentation and verification. If staff have doubts about the veracity or reliability of information received, they should pursue alternative methods until they are satisfied that their documentation is the best available. PHA staff are not required to accept information, simply because it is offered.

Developing personal relationships at a staff level with other agencies and local employers can improve the quality and timeliness of the information received. Some PHAs go to other agencies and employers to meet the individuals who provide verification information in order to establish a good working relationship. It is equally important that the PHA respond quickly when other agencies request permitted verification of housing assistance.

Types of Verification

Upfront Income Verification (UIV) (Level 6/5)

The verification of income before or during a family reexamination, through an independent source that systematically and uniformly maintains income information in computerized form for a number of individuals.

It should be noted that the EIV system is available to all PHAs as a UIV technique. PHAs are encouraged to continue using other non-HUD UIV tools, such as The Work Number (an automated verification system) and state government databases, to validate tenant-reported income.

Written Third Party Verification (Level 4)

An original or authentic document generated by a third party source dated either within the 60-day period preceding the reexamination or PHA request date. Such documentation may be in the possession of the tenant (or applicant), and is commonly referred to as tenant-provided documents. It is the Department's position that such tenant-provided documents are written third party verification since these documents originated from a third party source. The PHA may, at its discretion, reject any tenant-provided documents and follow up directly with the source to obtain necessary verification of information.

Examples of acceptable tenant-provided documentation (generated by a third party source) include, but are not limited to: pay stubs, payroll summary report, employer notice/letter of hire/termination, SSA benefit verification letter, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

Current acceptable tenant-provided documents must be used for income and rent determinations.

The PHA is required to obtain at a minimum, two current and consecutive pay stubs for determining annual income from wages. For new income sources or when two pay stubs are not available, the PHA should project income based on the information from a traditional written third party verification form or the best available information.

Note: Documents older than 60 days (from the PHA interview/determination or request date) is acceptable for confirming effective dates of income.

Written Third Party Verification Form (Level 3)

Also, known as traditional third party verification. A standardized form to collect information from a third party source. The form is completed by the third party by hand (in writing or typeset). PHAs send the form directly to the third party source by mail, fax, or email.

It is HUD's position that the administrative burden and risk associated with use of the traditional third party verification form may be reduced by PHAs relying on acceptable documents that are generated by a third party, but in the possession of and provided by the tenant (or applicant). Many documents in the possession of the tenant are derived from third party sources (i.e. employers, federal, state and/or local agencies, banks, etc.).

HUD recognizes that third party verification request forms sent to third party sources often are not returned. In other instances, the person who completes the verification form may provide incomplete information; or some tenants may collude with the third

party source to provide false information; or the tenant intercepts the form and provides false information.

HUD requires PHAs to rely on documents that originate from a third party source's computerized system and/or database, as this process reduces the likelihood of incorrect or falsified information being provided on the third party verification request form. The use of acceptable tenant-provided documents, which originate from a third party source, will improve the integrity of information used to determine a family's income and rent and ultimately reduce improper subsidy payments. This verification process will also streamline the income verification process.

Oral Third Party Verification (Level 2)

Independent verification of information by contacting the individual income/expense source(s), as identified through the UIV technique or identified by the family, via telephone or in-person visit. PHA staff should document in the tenant file, the date and time of the telephone call (or visit to the third party), the name of the person contacted and telephone number, along with the confirmed information.

This verification method is commonly used in the event that the independent source does not respond to the PHA's faxed, mailed, or e-mailed request for information in a reasonable time frame, i.e., ten (10) business days.

Tenant Declaration (Level 1)

The tenant submits an affidavit or notarized statement of reported income and/or expenses to the PHA. This verification method should be used as a last resort when the PHA has not been successful in obtaining information via all other verification techniques. When the PHA relies on tenant declaration, the PHA must document in the tenant file why third party verification was not available.

Exceptions to Third Party Verification Requirements

HUD is aware that in some situations, third party verification is not available for a variety of reasons. Oftentimes, the PHA may have made numerous attempts to obtain the required verifications with no success, or it may not be cost effective to obtain third party verification of income, assets, or expenses, when the impact on total tenant payment is minimal. In these cases, the PHA is required to document in the family file the reason(s) why third party verification was not available.

Family Consent

In order to obtain verifications, a PHA is required to obtain a release of information from the family member about whom information is being requested. Because of legitimate

privacy concerns, sources will usually not release information without the applicant's written release.

What Must Be Verified

PHAs are required to verify information relating to eligibility, assets, income, deductions from income, and compliance with applicant selection criteria.

1. Family composition (§5.617)
2. Social Security Numbers (§5.216)
3. Citizenship or Eligible Immigrant Status (§5.508)
4. Income (§5.617)
5. Assets and asset income (§5.617)
6. Deductions, such as (§5.617)
 - Family members (other than head or spouse) under 18
 - Age and/ or disability of family head or spouse
 - Disability of family members other than head or spouse
 - Full-time student status of family members other than head or spouse
 - Child Care costs
 - Disability assistance expenses (working families only)
 - Un-reimbursed medical expense (Elderly and Disabled Families only)
7. Compliance with Applicant Screening criteria (§960.206) (Public Housing)
 - Landlord references
 - Criminal history of all adult family members
8. Student Eligibility (Section 8) (§5.612)

Verification Forms (to download, go to <http://www.txtha.org/index.php/forms/>)

These forms may be used for public housing, any Section 8 program (project-based or tenant-based) and Tax Credit properties, with or without public housing or Section 8 subsidies.

Application Forms

Public Housing Pre-application
Section 8 Pre-application
Public Housing Application
Section 8 Application
Annual Income Checklist

Annual Income Worksheet
Asset Checklist
Asset Divestiture Data-gathering Worksheet
Asset Income Worksheet
Allowance Checklist
Adjusted Income Worksheet
Rent Calculation Worksheet
Reasonable Accommodations Notice
Special Unit Requirements Questionnaire
Verification of Special Unit Features

Income Verification Forms

Employment
Public Assistance
Social Security/SSI
Child Support
Military Pay
VA Benefits
Unemployment Benefits
Pension or Annuity
Self Employment
Zero Income
Asset Income

Allowances/Deductions from Income

Fulltime Student
Non-reimbursement of Child Care Expenses
Child care costs – Babysitter
Child care costs – Day care center
Medical Costs
Prescription Costs
Checklist for Disability Expense Verifications
Verification of disability
Disability Allowance
Certification of need for attendant care or auxiliary apparatus
Attendant care
Employer's certification of need for auxiliary apparatus
Cost of auxiliary apparatus
Certification for disability reimbursement

Screening

Screening Cover Letter
Landlord
Notice of Rejection
Police Record
Certification for Assistance to an Applicant Complying with Lease Terms

Verification of Ability to Comply with Lease Terms
Checklist: Ability to Comply with Lease Terms
Home Visit
Utilities

Reasonable Accommodation Forms

Request for a reasonable accommodation
Certification of need for a reasonable accommodation
Reasonable accommodation agreement for residents
Reasonable accommodation agreement for applicants
Resident's reasonable accommodation/structural modification notice
Applicant's reasonable accommodation/structural modification notice

Miscellaneous

Certification on use of Other Than 3rd Party Written Verification
Certification on Social Security Income
Certification on Medical and Disability-Related Information
Threat Assessment
Imputed welfare Income
Waiting List update package
Denial of Interim Adjustment to Income
Final Notice
Over-income for HAP
Consent to enter resident unit
Live-in Aide Agreement
Visitor registration form

Verifying Family Composition and Type

(At reexam time, no additional verifications are required unless family circumstances have have chan have changed over the past year)

Age Documentation

1. A birth certificate or other official record of birth is the preferred form of age verification for all family members.
2. For elderly family members, an original document that provides evidence of the receipt of social security retirement benefits is acceptable.
3. If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

4. All documents, including driver's licenses, will be copied and the copies will be placed in the family file.
5. Age must be verified only once during occupancy.

Family Relationships

The following documents will be acceptable for determining familial relationships

- a. Birth Certificates;
 - b. Certificates of birth issued by a physician, midwife or hospital;
 - c. Verification of adoption
 - d. Guardianship or custody documents issued by a magistrate or judge;
 - e. Award Letters showing benefits paid on behalf of a minor or disabled adult;
 - f. Documents from school systems or doctors demonstrating kinship care;
 - g. Prior year's tax returns showing sharing of expenses;
 - h. Proof of living arrangements and sharing of expenses.
1. Head of Household
 - A. Applicants are required to identify the relationship of each household member to the head of household.
 - B. Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance.
 - C. Certification by the head of household normally is sufficient
 2. Marriage
 - A. Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.
 - B. A marriage certificate generally is required to verify that a couple is married.
 - C. In the case of common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

- D. A couple that is not married or claiming to be married but lives in a relationship where resources and expenses are shared must provide proof of the shared financial situation (for example, bank statements, cosigned leases).

3. Divorce

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to document the divorce or separation with

- a certified copy of a divorce decree, signed by a court officer
- a copy of a court-ordered maintenance or other court record demonstrating separation
- if no court document is available, documentation from a community-based agency will be accepted.

4. Joint Custody of Children

- A. If the family claims that a dependent is subject to a joint custody arrangement, PHA will accept a family self-certification that the dependent or dependents live with the applicant 50 percent or more of the time.
- B. If more than one applicant family is claiming the same dependent(s) as family member(s), and there is a dispute, PHA will review applicable documents such as
- court orders describing the custody
 - IRS return showing dependents

5. Absence of Adult Member

- A. If an adult member is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family, such as documentation of another address
- lease
 - utility bill
- B. If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member

- PHA will request a verification from a responsible medical professional and will use this as a determination of family member's status.
- If this is not available, the family may provide evidence that the family member is confined on a permanent basis and request that the person not be counted as a family member.

6. Foster Children or adults

- A. Third party verification from the state or local government agency responsible for the placement of the individual with the family is required.
- B. Copies of verification will be placed in family file

7. Independent College Student

Verification required as follows:

- 1) Proof of legal age (18 in Texas) or an emancipated minor
 - a) valid drivers license
 - b) identification card issued by a federal, state or local agency
 - c) identification issued by a medical insurance company
 - d) birth certificate
 - e) court documents demonstrating emancipation
- 2) Proof of separate residence for at least one year prior to applying for assisted housing
- 3) Proof that student is not being claimed as a dependent on parent or guardian's IRS tax return.

8. **HCV Only** - Where a student of an institution of higher learning is applying for assistance, the following forms will be used to determine eligibility. The forms will be signed and placed in applicant/participant files

- 1) Student Questionnaire
- 2) Student Certification of Dependent Status
- 3) Parent Self Certification/Declaration of Income

Verifying Social Security Numbers

(At reexam time, there is no need to re-verify unless there are new family/household members).

Social Security Numbers of all family and household members must be verified. Third party verification is not necessary for SSN verification. Once documentation of SSN is obtained, SSN need not be verified again at reexaminations.

- I. Staff person will accept the following as proof of SSN
 - A. A Social Security Card
 - B. Letter from Social Security Administration that establishes and states the number
 - C. Other documents that contain the SSN
 - 1) Driver's License
 - 2) Identification card issued by a federal, state or local agency
 - 3) Identification card issued by a medical insurance company or provider (including Medicare and Medicaid)
 - 4) Identification card issued by an employer or trade union
 - 5) Benefit award letters from government agencies
 - 6) Retirement benefit letter
 - 7) Life insurance policies
 - 8) Court records (real estate, tax, marriage and divorce, judgments, or bankruptcy)

If a child under the age of 6 years was added to the household within the 6-month period prior to the household's date of admission (or, for the HCV program, the date of voucher issuance), the assistance applicant may become a participant, so long as the documentation required is provided to the PHA within 90 calendar days from the date of admission into the program (or, for the HCV program, the effective date of the Housing Assistance Payment contract). The PHA must grant an extension of one additional 90-day period if it determines, in its discretion, the applicant's failure to comply was due to circumstances that could not reasonably have been foreseen and were outside the control of the applicant. If the applicant family fails to produce the documentation within the required time period, assistance will be denied.

Verifying Citizenship Status

Only citizens and eligible immigrants are eligible for assistance. A mixed family—at least one family member is a citizen—can still be housed but rent is figured on the basis of assistance being provided only to the citizens/eligible immigrants in the family. Verifications of citizen status are only required at initial application. Documentation will also be required for any individuals who are added to the lease later.

1. Citizens
 - A. All family members claiming to be citizens must sign the Declaration of Section 214 Status form which will be placed in the family file.
 - B. All family members claiming to be citizens must show proof of their status with one of the following documents. Staff person will copy document and place copy in the family's file
 - Birth Certificate
 - U. S. Passport
 - Military ID
 - Social Security Card
 - Voter Registration Card
 - Baptismal certificates
 - Military Discharge form (DD 214 Form)
 - Employer Identification Card
 - Adoption papers (legal identity for children)
 - Custody agreement (legal identity for children)
 - Health and Human Services ID (legal identity for children)
 - School Records (legal identity for children)
 - C. A photo ID will be required of each member to back up the above documents; staff person will copy and place copy in the family file.

- Driver's License
- State ID
- Student ID
- Job ID Badge

D. At the PHA's discretion, If none of the above can be provided, a third party who knows the person may attest to the person's identity. Certification must be provided in a format acceptable to the PHA and signed in the presence of a PHA representative.

2. Non-citizens

A. Non-citizens claiming legal status must sign the Declaration of Section 214 Status form, indicating the kind of legal immigration status they have. Staff person will place the form in the family file.

- 1) If the person is 62, he/she must also produce proof of age; copy of proof will be placed in family file.
- 2) If the person is under 62, he/she must also sign a Release of Evidence form, a copy of which will be placed in the family file
 - a. ONE of the following documents must be produced to show status
 - Alien Registration Card
 - Form I-94 Arrival-Departure Record, with ONE of the following annotations
 - Admitted as Refugee Pursuant to Section 207
 - Section 208 (Asylum)
 - Section 243(h) (Deportation stayed by Attorney General)
 - Paroled Pursuant to Section 212(d)(5) of the INA
 - Unannotated Form I-94 Arrival-Departure Record, with ONE of the following:

- Final court action granting asylum, if no appeal is taken
- Letter from USCIS asylum officer granting asylum (application filed on or after 10/1/90) or USCIS district director granting asylum (application filed before 10/1/90)
- Court decision granting withholding of deportation
- Letter from asylum officer granting withholding of deportation (if application filed on or after 10/1/90)
- Form I-688 Temporary Resident Card, annotated: Section 245A or Section 210
- Form I-688B Employment Authorization Card, annotated "Provision of Law 274a.12(11)" or "Provision of Law 274a.12"
- Receipt issued by the USCIS indicating that the application for issuance of a replacement document in one of the above-listed categories has been made and the applicant's entitlement to the document has been verified.
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice public in the Federal Register.

b. The PHA staff person who views an original document will

- make a copy of the document
- annotate the copy with the name of the person who provided the document
- indicate on the copy of the document the date the original was viewed
- sign the copy
- place the copy in the family file

- c. PHA must still verify eligible immigrant status through the U. S. Citizenship and Immigration Services (USCIS) using the USCIS protocols for verification on eligible immigration status. These documents will be placed in the families file.
3. Non-citizens who are NOT eligible immigrants (this includes students on student visas) will sign a Certification of Non-eligible Immigrant Status form, which will be placed in the family file.
4. Family members who claim U. S. Citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

Income Verification

NOTE: Fixed incomes need only be verified every three years.

Earned Income - Wages, Salaries, Tips

The PHA will not make assumptions about whether someone may or may not have a particular type of income. For example, even if there are no children in the family, a family member may be receiving child support payments resulting from back payments owed to the family member. Another consideration is that even low income families may have asset income.

1. Up-Front Verification
 - A. The Work Number is the most commonly used source of UIV for applicants. For instructions, go to

<http://www.theworknumber.com/SocialServices/index.asp>

Information received will be placed in applicant file
 - B. IRS Letter 1722 - considered by HUD as up-front verification
 - 1) At the PHA's discretion, the family will be informed that an IRS tax account listing--which shows the family's filing status, exemptions claimed, adjusted gross income, taxable income, taxes paid--is acceptable for verification.

- 2) Family or individual may obtain their own listing by calling the IRS at 1-800-829-1040.
2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Income from Employment Verification** form, signed by the family member, will be mailed or faxed no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
3. Third Party Oral Verification
 - A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
 - C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided. Staff person will confirm start and termination dates of employment, where applicable.
 - D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
4. Document Review
 - A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
 - B. Reasons acceptable by HUD and the PHA are
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck

- 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review which may include:
- 1) _____ consecutive pay stubs (**PHA's choice**)
 - 2) Computer print-outs from employers
 - 3) IRS Tax Forms, including 1099, 1040, 4506 and 8821
 - 4) W-2 forms

5. Family Certification/Declaration

When the first four levels of verification are not possible or feasible, PHA may accept a certification from the family, signed in front of a PHA representative, that declares the family's total income from earnings. Documentation will be placed in family file.

For reexaminations, PHA will utilize the HUD EIV (Enterprise Income Verification System)

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/rhii/p/uivsystem

A. When discrepancies occur

- 1) In cases where there is a difference between EIV income data and family reported income of less than \$200 per month, staff person will follow the following guidelines:
 - If EIV reported income is less than current resident-provided documentation, the staff person will use resident-provided documentation to calculate anticipated annual income
 - If EIV reported income is greater than current resident-provided documentation, the staff person will use EIV income data to calculate anticipated income unless the resident provides the PHA with documentation of a change in circumstances (i.e. change in employment, reduction in hours, etc.). Upon receipt of acceptable documentation of a

change in circumstances, the PHA will use this documentation to calculate anticipated annual income.

2) In cases where there is a difference between EIV reported income and family reported income of \$200 or more per month, PHA will follow the following guidelines:

- The PHA shall request written third party verification from the discrepant income source;
- The PHA will analyze all data (EIV data, third party verification and other documentation/information provided by the family) and attempt to resolve the income discrepancy.
- If it is determined that the family misreported income of no greater than _____per month, they will be offered a repayment agreement.
- If the family refuses to enter into a repayment agreement or if the discrepancy amount is greater than _____, the PHA will initiate eviction proceedings.

3) If income discrepancies are found, no adverse action will be taken against a tenant until the PHA has independently verified the EIV information and the tenant has been granted an opportunity to contest any adverse findings through the PHA-established grievance or hearing procedure or other legal procedures.

B. If family reports receiving income from employment and nothing comes back on the EIV System, PHA staff person will proceed to third party written verification.

C. EIV records will be handled according to the **EIV Security Policy**.

Earned Income - Self-Employment and Business Income

1. If a family member has been self-employed less than 3 months, the PHA will accept the individual's certified estimate of income and schedule an interim reexamination in 3 months. Certification will be place in family file.

2. If the family member has been self-employed for 3 to 12 months, the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.
3. Self-employed persons and business owners will be required to provide the following.
 - A. An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and business-owner must certify to its accuracy.
 - B. All schedules completed for filing federal and local taxes in the prior year
 - C. If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules
4. The PHA will provide a format for anyone who is unable to provide such a financial statement to record income and expenses for the coming year. The person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.
5. At any reexamination, family member may be requested to submit documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

Excluded Income

PHA may accept an applicant or participant's self-certification as verification of fully excluded income. The PHA's application and reexamination documentation, which is signed by all adult family members, may serve as the self-certification of the fully excluded income.

Child Support (2016)

1. Up-Front Verification - Attorney General's Website (instructions for staff)
If family member is willing to provide PIN number, staff person will have him/her sign the **Child Support Online Information Release** form.

2. Third Party Written/Oral Verification

A. If the family does not have or will not provide PHA with the PIN, staff person will have the family sign the **Verification of Child Support Income** form and staff person will fax it to the Child Support Office at 512/460-6669 or scan and email it to housingauthority@texasattorneygeneral.gov for processing.

- 1) A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- 2) Child Support office will return form by mail; when information is received, staff person will place in family file.
- 3) If there is no response within 10 days, staff person will call the Child Support Office for verification. Information will be documented on the file copy of the verification form with and signed by staff person.

B. In lieu of the above, PHA will accept a signed letter from the father indicating that child support is being paid, how much and how often.

3. Document Review

If third party verification is not available (for example, child support is being paid from another state) PHA will have family provide one of the following, which staff person will copy and place in family file.

- 1) Copy of a separation or settlement agreement or divorce decree stating amount and type of support and payment schedules
- 2) Copy of the latest check and/or payment stubs

4. Self Certification

If none of the above is possible, family's self-certification of amount received and likelihood of support payments being received in the future or statement that support payments are not being received will be accepted. Certification will be placed in family file.

5. If the family declares that it receives irregular or no payments, the family must also provide evidence that it has taken all reasonable efforts to collect

amounts due, including the following, copies of which will be placed in family file:

- A. a statement from the Attorney General's office showing the family has requested enforcement and is cooperating with all enforcement efforts.
- B. a written statement from any independent collection entity that has helped the family with enforcement efforts. (families are not required to take independent action on enforcement)

College Student Income

1. Income of full time students living with parents or guardians is not counted unless the student is receiving an Athletic Scholarship. In this case, only the part of the scholarship designated for housing costs is counted.
 - A. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - 1) The form **Athletic Scholarship Verification** will be signed by the family member, and mailed or faxed to the school no later than 5 days after the initial interview with the family
 - 2) A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - 3) If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
 - b. Third Party Oral Verification
 - 1) Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - 2) Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally. All documents or copies of applicable documents will be placed in family file.

- 3) Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - 4) If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
- c. Document Review--PHA may view family-provided documents that verify enrollment.
2. Full-time students of non-parental/guardian households - status as living independently from parent or guardian will be verified. If independent status is confirmed, income eligibility will determined in the same manner as other family applicants and income verified in the same manner as other family applicants. The form **Student Certification of Dependent Status** will be used to verify whether or not student is receiving financial assistance from a parent or other personal source.
 3. HCV only - college students must first meet eligibility requirements through test provided for in 24 CFR 5.612, which states: No assistance shall be provided under Section 8 of the 1937 Act to any individual who:
 - a. Is enrolled as a student at an institution of higher education, as defined under section 102 of the Higher Education Act of 1965;
 - b. Is under 24 years of age;
 - c. Is not a veteran of the U. S. military;
 - d. Is unmarried;
 - e. Does not have a dependent child; AND
 - f. Is not otherwise individually eligible, or has parents who, individually or jointly are not eligible.

For a student who is determined eligible and is applying for assistance separately from parents or guardians, financial assistance other than amounts for tuition are counted as income and the income will be verified, as outlined below.

- a. Third Party Verification
 - 1) The **Verification of Student Status and Financial Aid** form and **Student Certification of Dependent Status** form will be signed by the applicant and will be mailed or faxed to the applicable sources no later than 5 days after the initial interview with the applicant

- 2) A copy of the blank signed verification forms will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - 3) If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
- b. Third Party Oral Verification
- 1) Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - 2) Staff person will use the blank verification forms in the file to document attempts to reach source (including no-answer calls) and to document information received orally. In lieu of a verification form, PHA staff may have the applicable institution or individual fax financial assistance and tuition verification information to the PHA. All documents or copies of applicable documents will be placed in family file.
 - 3) Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - 4) If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
- c. Document Review--PHA may view family-provided documents that verify tuition/assistance.

Military Pay

1. Military pay will be verified through an up-front verification system should it become available.
2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Military Pay Verification** form, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family

- B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.

3. Third Party Oral Verification

- A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
- B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
- C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
- D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification

4. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
- B. Reasons acceptable by HUD and the PHA are
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review.

5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA will accept a certification from the family, signed in front of a PHA representative,

declaring the family's total income from military pay. Documentation will be placed in family file.

Pension/Retirement Income

1. Retirement benefits will be verified through an up-front verification system should it become available.
2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Pension & Annuity Verification** form, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
3. Third Party Oral Verification
 - A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
 - C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
4. Document Review
 - A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.

- B. Reasons acceptable by HUD and the PHA are
- 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review, which may include an original benefit notice from the provider.

5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA will accept a certification from the family, signed in front of a PHA representative, declaring the family's total income from the pension or annuity. Documentation will be placed in family file.

Social Security/SSI Benefits

1. Social Security and SSI Benefits will be verified through an up-front verification system should it become available.
2. According to HUD PIH Notice 2004-18, SSA will not provide third party written verification for Social Security Benefits or SSI. PHA will be required to use third party oral or document review to verify benefits for applicants.
3. PHA will request a current (dated within the last 60 days) SSA benefits verification letter from each family member that receives social security benefits. Letter will be copied and copy placed in the family file.
4. If the family is unable to provide the document(s) or the document(s) is/are older than 60 days, the PHA will have the family request a benefit letter by either calling SSA at 800/772-1213 or requesting online at www.ssa.gov. Once family has received the letter, it must be provided to the PHA. A copy of the letter will be made and placed in the family file.

TANF (Temporary Assistance For Needy Families)

1. TANF benefits will be verified through an up-front verification system should it become available.
2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Temporary Assistance to Needy Families Verification** form, signed by the family member, will be mailed or faxed to the Health and Human Services Office no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
3. Third Party Oral Verification
 - A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
 - C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided. Staff person will confirm start and termination dates of assistance.
 - D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
4. Document Review
 - A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
 - B. Reasons acceptable by HUD and the PHA are

- 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review, which may include
- 1) an original award notice
 - 2) printout from HHS.
5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA may accept a certification from the family, signed in front of a PHA representative, that declares the family's total income from TANF. Documentation will be placed in family file.

Unemployment Benefits

1. Unemployment benefits will be verified through an up-front verification system should it become available.
2. Texas Workforce Commission has indicated that they will no longer provide verification of unemployment benefits without charging the PHA. According to HUD Headquarters, PHA may view and document the third party information brought to you by the applicant. PHA staff will then further verify the information later through EIV, once the information has had time to be put in the system.
3. Family will be notified that they have 10 days to bring in applicable documents for review, which may include
 - 1) an original benefit notice
 - 2) unemployment stub
 - 3) printout from TWC.
4. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA will accept a certification from the family, signed in front of a PHA representative, declaring the family's total income from unemployment benefits. Documentation will be placed in family file.

VA Benefits

1. VA benefits will be verified through an up-front verification system should it become available.
2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **V. A. Benefits Verification** form, signed by the family member, will be mailed or faxed to the Veteran's Administration no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
3. Third Party Oral Verification
 - A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
 - C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
4. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
 - B. Reasons acceptable by HUD and the PHA are
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
 - C. Family will be notified that they have 10 days to bring in applicable documents for review, which may include an original benefit notice, or printout from VA.
5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA will accept a certification from the family, signed in front of a PHA representative, declaring the family's total income from VA Benefits. Documentation will be placed in family file.

Workers Compensation (income replacement payments - not lump sum)

- 1. Workers Compensation Benefits will be verified through an up-front verification system should it become available.
- 2. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Workers Compensation Verification** form, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
- 3. Third Party Oral Verification

- A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
- B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
- C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
- D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification

4. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
- B. Reasons acceptable by HUD and the PHA are
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review.

5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA will accept a certification from the family, signed in front of a PHA representative, declaring the family's total income from Workers Compensation Benefits. Documentation will be placed in family file.

Zero Income Status

(PHA may determine its own method for establishing an approximate income figure when a family declares that it has no income; home visits are not required; keep in mind that like families must be treated the same)

- 1. For families claiming to have no annual income the following procedure will be followed:

- A. PHA will run a check with the Work Number or EIV for reexams
 - B. PHA will run routine verifications on Social Security, SSI, Unemployment, TANF, and any other applicable form.
2. When feasible, the PHA will visit the family in their home to determine the likelihood of the report. If the family has a car, a telephone, smokes, uses disposable diapers on a baby or has other evidence of some form of income, the applicant will be asked to explain the source of income supporting cash expenditures when zero income is present.
 3. Many applicants may be unaware that regular contributions (even non-cash contributions) to the household would be considered income if they are not for food or medical expenses. For example, if someone who is not a household member pays the telephone bill every month, or buys gas, tires and insurance for the car, these contributions would be considered income for the purposes of the public housing program.
 4. A family budget or statement of financial responsibility may be required from the applicant. Investigations may include ordering a credit report on the tenant.
 5. PHA will determine whether any of the indicated expenses are covered by excluded income sources that may be supporting the family.

Verifying Assets

1. Assets will be verified through an up-front verification system should it become available.
2. The Authority will use review of documents instead of third party verification when the market value of an asset or expense is less than \$500 annually and the family has original documents that support the declared amount.
3. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. The **Asset Verification** form, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family

- B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.

4. Third Party Oral Verification

- A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
- B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
- C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
- D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification

5. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
- B. Reasons acceptable to the PHA are:
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
 - 3) The amount to be verified is an insignificant amount and it is not cost effective or reasonable to obtain third party verification. Postage and envelopes are not considered unreasonable costs.
- C. Family will be notified that they have 10 days to bring in applicable documents for review. Acceptable documents include:
 - 1) Passbooks

- 2) Checking account statements
- 3) Certificates of deposit, bonds, or financial statements supplied by a family, if completed by a financial institution or broker
- 4) Estimates by a stockbroker or real estate agent of the net amount a family would receive if it liquidated securities or real estate
- 5) Real estate statements if the approximate current market value can be deduced from them
- 6) Current lease for rental property that shows the rental amount or certification from current tenant regarding rent amount
- 7) Financial statements for business assets
- 8) Copies of closing documents showing selling price and distribution of sale proceeds
- 9) Appraisals of personal property held as an investment

6. Family Certification/Declaration

- A. When the other forms of verification are not possible or feasible, staff person may accept a certification from the family, signed in front of a PHA representative, that declares the family's total assets and income from assets. Documentation will be placed in family file.
- B. If any assets have been disposed of for less than fair market value in the preceding two years, the family must certify to this fact. Certification will be placed in family file.
- C. Rental Property
 - 1) family members with rental property must provide a self-certification providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income). Certification will be placed in family file.
 - 2) If Schedule E was not prepared, PHA will require family members to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including
 - tax statements

- insurance invoices
- bills for reasonable maintenance and utilities
- bank statements or amortization schedules showing monthly interest expense.

Verifying Income Deductions/Allowances

Eligibility for the following deductions/allowances will be determined through verification.

- Elderly /Disabled Family Status
- Dependents
 - Children under 18
 - Disabled or handicapped Family member 18 or older, other than head or spouse
 - Full-Time Students 18 or older, other than head or spouse
- Child Care Expense
- Medical Expense (Elderly/Disabled Families only)
- Disability Assistance expense

Elderly /Disabled Household Deduction

1. Verification of age and declaration that the head, spouse or co-head is 62 years of age will suffice as verification of elderly family status.
2. Disabled family status
 - A. Disability verification will be required for the following:
 - 1) to determine eligibility for disability-related deductions
 - 2) to determine eligibility for accessible unit or special accommodation
 - B. If the head or spouse of a family indicates that he/she is receiving disability benefits through Social Security Administration, verification of income will serve as verification of disability

- C. For family members claiming a disability but not receiving disability payments from SSA, staff person will use the Disability Verification form to document that the person meets HUD eligibility definition of a person with disabilities.
- D. Form will be mailed or faxed directly to a qualified professional having knowledge of the person's disability and able to verify.
- E. All documentation will be placed in the family file.

Dependent Deductions

- 1. **CHILDREN UNDER 18:** Staff person will verify this from original documents supplied by family that indicate age of family member, e.g., birth certificate. Documents will be copied and copies placed in the family file.
- 2. **DISABLED OR HANDICAPPED FAMILY MEMBER** 18 or older, other than head or spouse
 - A. Disability verification will be required for the following:
 - 1) to determine eligibility for disability-related deductions
 - 2) to determine eligibility for accessible unit or special accommodation
 - B. If a family member other than head or spouse indicates that he/she is receiving disability benefits through Social Security Administration, verification of income will serve as verification of disability.
 - C. For family members claiming a disability but not receiving disability payments from SSA, staff person will use the **Disability Verification** form to document that the person meets HUD eligibility definition of a person with disabilities.
 - D. Forms will be mailed or faxed directly to a qualified professional having knowledge of the person's disability and able to verify
 - E. Doctor's statements will also be accepted as verification
 - F. All information received will be placed in family file.

SPECIAL REQUIREMENTS RELATED TO DISABILITY DOCUMENTATION

(for information on health care privacy laws, see Department of health and Human Services website at www.os.dhhs.gov)

- The PHA is not permitted to inquire about the nature or extent of a person's disability (24 CFR 100.202(c))
- The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition.
- If the PHA receives a verification document that provides such information, the PHA will not place this information in the family file.
- Under no circumstances will the PHA request an individual's medical record(s).

3. FULL-TIME STUDENTS 18 OR OLDER, other than head or spouse

- A. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
- 1) The **Student Status Verification** form, signed by the family member, will be mailed or faxed to the school no later than 5 days after the initial interview with the family
 - 2) A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - 3) If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
- B. Third Party Oral Verification
- 1) Staff person will phone, email or contact in person the verification source to attempt to verify information.

- 2) Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally. In lieu of a verification form, PHA staff may have the institution fax enrollment verification information to the PHA. All documents or copies of applicable documents will be placed in family file.
 - 3) Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - 4) If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
- C. Document Review--PHA may view family-provided documents that verify enrollment.

Child Care Expense

1. The PHA will verify that the child is eligible for care
To be eligible for the child care deduction, the child must be under the age of 13. This includes Foster children as well. Original age verification will be used to verify this status.
2. The PHA will verify that the costs claimed are not reimbursed
This will be accomplished through one of the following:
 - A. Family will be asked to complete the **Childcare Applicant/Tenant Certification for Expenses** form and sign the form, which will be placed in the family file.
 - B. Third party verification from child care provider
3. The PHA will verify that the costs are for an allowable type of child care and a reasonable amount
 - A. Allowable and reasonable child care is defined as follows
 - 1) is paid for the care of children under 13
 - 2) is necessary to enable a family member to actively seek employment, be gainfully employed or to further his or her education
 - 3) amounts are not reimbursed from any source

- 4) amounts do not exceed the amount of employment income that is included in the family's annual income
- 5) amounts do not exceed the PHA-determined allowance
 - The PHA will periodically survey local child care providers to determine the current rates.
 - The PHA will use an average of the amounts charged by 4 local child care agencies or centers to determine a maximum allowable deduction per child. (PHA will take into account the differences in types of childcare when determining an allowance or allowances)
 - The PHA's current maximum allowance is _____per child per week.

B. Third Party Written Verification

- 1) The **Childcare Verification** form (when an individual is providing care) or the **Childcare Expenses Verification** form (when an institution or organization is providing the care), signed by the family member, will be mailed or faxed by the PHA to the applicable entity no later than 5 days after the initial interview with the family
- 2) A copy of the blank signed verification forms will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- 3) If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.

C. Third Party Oral Verification

- 1) Staff person will phone, email or contact in person the verification source to attempt to verify information.
- 2) Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.

- 3) Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - 4) If it is apparent that third party oral verification is not possible, then staff person will proceed to the next available level of verification
- D. Review of documents - any family-provided documents that prove that child care is being paid, such as receipts or canceled checks.
- E. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA may accept a certification from the family, signed in front of a PHA representative, that declares the family's estimated anticipated costs to be incurred during the upcoming 12 months.. Documentation will be placed in family file.

4. The PHA will verify that the costs enable a family member to pursue an eligible activity
- A. Gainfully employed
- Income verifications will provide necessary documentation to verify this.
- B. Seeking employment
- 1) Wherever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., Health and Human Services or Texas Workforce Commission).
 - 2) If third party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts.
- C. Furthering education
- 1) **Student Status Verification** form will be mailed or faxed to the applicable institution for verification of student's status
 - 2) If verification form or information is not received within 10 days, staff person will phone or email the institution and request that enrollment information on the applicant be faxed or emailed

directly to the PHA office. All documents or copies of applicable documents will be placed in family file

Medical Expense

1. Eligibility for medical expense will be verified through verification of age and/or disability status.
2. Third Party Written Verification
 - A. The **Medical Expense Verification** form and the **Prescription Verification** form, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family
 - B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
 - C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.
3. Third Party Oral Verification
 - A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
 - B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
 - C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
 - D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification
4. Document Review
 - A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.

B. Family will be notified that they have 10 days to bring in applicable documents for review, which will be copied and placed in the family file. Documents may include:

- 1) copies of cancelled checks used for medical expenses
- 2) printouts or receipts from the source
- 3) evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.

5. Family Certification/Declaration

When the other forms of verification are not possible or feasible, PHA may accept a certification from the family, signed in front of a PHA representative, that declares the family's estimated anticipated costs to be incurred during the upcoming 12 months. Documentation will be placed in family file.

Disability Assistance Expense

1. The PHA will seek third party verification from a Rehabilitation Agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or apparatus enables another family member, or members to work.
2. The PHA will require the family to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source. Form **Family Certification for Disability Expense Reimbursement** will be completed and signed by the family and placed in the family file.
3. Third Party Written Verification - This is the preferable method when up-front verification is not available. Families MAY NOT return forms themselves; they must be sent directly from the verification source.
 - A. One or more of the following applicable forms, signed by the family member, will be mailed or faxed to the applicable entity no later than 5 days after the initial interview with the family

- **Auxiliary Apparatus Cost Verification**
- **Certification of Need for Persons with Disabilities** (health professional)
- **Attendant Care Verification**

- **Employer's Certification of Need for Auxiliary Apparatus to Permit Employment**

- B. A copy of the blank signed verification forms will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.

4. Third Party Oral Verification

- A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
- B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
- C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided.
- D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification

5. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
- B. Family will be notified that they have 10 days to bring in applicable documents for review which may include:
 - 1) copies of cancelled checks used to make attendant care payments and/or receipts from care source
 - 2) billing statements for purchase of auxiliary apparatus or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

6. Applicant Certification/Declaration

When other forms of verification are not available,

- A. The PHA will require a certification from the family, signed in front of a PHA representative, that declares that the disability assistance expense frees a family member, or members to work.
- B. In the case of an apparatus, the family must certify the estimated apparatus costs for the upcoming 12 months.
- C. In the case of attendant care, the family must certify the estimated cost for attendant care for the upcoming 12 months.
- D. All documentation will be placed in family file.

VERIFICATIONS AT RE-EXAMINATION

FAMILY COMPOSITION AND TYPE

No additional verifications are required unless family circumstances have changed over the past year.

SOCIAL SECURITY NUMBERS

Once PHA has received verifications and/or certifications on all family members' SSNs there is no need to re-verify.

CITIZENSHIP STATUS

Unless a new member has been added to the household or a formerly ineligible non-citizen claims eligible status, no additional verification is required beyond what was done at the application stage.

INCOME VERIFICATION

- 1. The HUD-prescribed five methods of acceptable verifications for income are listed below in priority order.
 - A. Enterprise Income Verification (EIV)

- B. Third Party Written Verification
 - C. Third Party Oral Verification
 - D. Document Review
 - E. Family Certification/Declaration
2. The PHA will not make assumptions about whether someone may or may not have a particular type of income. For example, even if there are no children in the family, a family member may be receiving child support payments resulting from back payments owed to the family member. Another consideration is that even low income families may have asset income.
 3. At first re-examination after a family has chosen Flat Rent income will not be re-verified if they choose to remain on flat rent for the next twelve months. They will not have their income verified until three years after initial verification UNLESS, before the end of the three year period, they opt to go on Income-based rent.

EARNED INCOME - WAGES, SALARIES, TIPS

1. PHA will utilize the HUD EIV (Enterprise Income Verification) System
For details on using the system, refer to EIV User Manual and other guidance, accessed at <http://www.hud.gov/offices/pih/programs/ph/rhiip/uivsystem.cfm>
 - A. When discrepancies occur
 - 1) In cases where there is a difference between EIV income data and family reported income of less than \$200 per month, staff person will follow the following guidelines:
 - If EIV reported income is less than current resident-provided documentation, the staff person will use resident-provided documentation to calculate anticipated annual income
 - If EIV reported income is greater than current resident-provided documentation, the staff person will use EIV income data to calculate anticipated income unless the resident provides the PHA with documentation of a change in circumstances (i.e. change in employment, reduction in hours, etc.). Upon receipt of acceptable documentation of a change in circumstances, the PHA will use this documentation to calculate anticipated annual income.

- 2) In cases where there is a difference between EIV reported income and family reported income of \$200 or more per month, PHA will follow the following guidelines:
 - The PHA shall request written third party verification from the discrepant income source;
 - The PHA will analyze all data (EIV data, third party verification and other documentation/information provided by the family) and attempt to resolve the income discrepancy.
 - If it is determined that the family misreported income of no greater than _____per month, they will be offered a repayment agreement.
 - If the family refuses to enter into a repayment agreement or if the discrepancy amount is greater than _____, the PHA will initiate eviction proceedings.
- 3) If income discrepancies are found, no adverse action will be taken against a tenant until the PHA has independently verified the EIV information and the tenant has been granted an opportunity to contest any adverse findings through the PHA-established grievance or hearing procedure or other legal procedures.

- B. If family reports receiving income from employment and nothing comes back on the EIV System, PHA staff person will proceed to third party written verification.
- C. EIV records will be handled according to the **EIV Security Policy**.

2. Third Party Written Verification - Families MAY NOT return forms themselves; they must be sent directly from the verification source.

- A. The **Employment Income Verification** form, signed by the family member, will be mailed or faxed no later than 5 days after the initial interview with the family
- B. A copy of the blank signed verification form will be placed in the file to document when forms are sent and to use if oral verification becomes necessary.
- C. If forms are not received within 10 days of the mailing/faxing, staff person will proceed to the next level of verification, Third Party Oral Verification.

3. Third Party Oral Verification

- A. Staff person will phone, email or contact in person the verification source to attempt to verify information.
- B. Staff person will use the blank verification form in the file to document attempts to reach source (including no-answer calls) and to document information received orally.
- C. Staff person will record on the form the name and title of the person contacted (or attempted to contact), the date and time of conversation, the telephone number used, and facts provided. Staff person will confirm start and termination dates of employment, where applicable.
- D. If it is apparent that third party oral verification is not possible, then staff person will proceed to the next level of verification

4. Document Review

- A. In every case where third party verification is not available, staff person will document in the file the reason it is not available.
- B. Reasons acceptable by HUD and the PHA are
 - 1) PHA has made at least two documented attempts to obtain third party verification with no luck
 - 2) Income Source does not have the capability to provide written or oral third party verification or refuses to provide it
- C. Family will be notified that they have 10 days to bring in applicable documents for review which may include:
 - 1) _____ consecutive pay stubs (**PHA's choice**)
 - 2) Computer print-outs from employers
 - 3) IRS Tax Forms, including 1099, 1040, 4506 and 8821
 - 4) W-2 forms
- D. The PHA staff person who views an original document will
 - 1) make a copy of the document

- 2) annotate the copy with the name of the person who provided the document
- 3) indicate on the copy of the document the date the original was viewed
- 4) sign the copy
- 5) place the copy in the family file

6. Family Certification/Declaration

When the first four levels of verification are not possible or feasible, PHA may accept a certification from the family, signed in front of a PHA representative, that declares the family's total income from earnings. Documentation will be placed in family file.

ASSETS

For purposes of recertification, PHA will accept a family's declaration of assets when net assets are \$5,000 or less. PHA will obtain third party verification of all family assets every three years.

