

RESIDENT SELECTION CRITERIA PHA/PBRA PROGRAMS (AHA)

GENERAL ELIGIBILITY CRITERIA: All applicants must meet the requirements within the Resident Selection Criteria. The Resident Selection Criteria is used to demonstrate the applicant's suitability as a resident, using verified information on current and past conduct to document an applicant's ability (either alone or with assistance), to comply with the rules governing tenancy. Revisions of this Resident Selection Criteria may be implemented from time to time. A copy of the current Resident Selection Criteria can be obtained from the leasing office and a copy will be given to each applicant before their application is processed.

GENERAL RENTAL STANDARDS:

- **EQUAL HOUSING:** Columbia Residential will offer to rent to qualified persons regardless of age (except when age is related to eligibility), race, color, sex, sexual orientation, gender identity, religion, national origin, creed, handicap, mental or physical disability, marital status, or familial status in compliance with all federal, state, and local laws.
- **CREDIT:** All applicants are subject to approval through a third-party applicant screening agency. Approvals are based on an empirical system that incorporates various credit factors along with other non-statistical scoring factors to determine overall applicant worthiness. The primary criterion used to determine rental decisions is a statistically based LeasingDesk Score; which is a cumulative analysis from several statistical indicators that calculates an applicant's overall credit score and then rates the applicant from 0 to 1000. **LeasingDesk Score Results: 0-349 Fail and 350-1000 Pass.** In addition to the LeasingDesk score, the following categories (a-d) will automatically Fail/Deny an applicant: **(a) Eviction Judgements** and **(b) Foreclosures** within the past twenty-four (24) months **(c) Three or more Eviction Filings** less than or equal to twelve (12) months **(d) Any Filed Bankruptcy**, all years. Furthermore, the following auto score categories (e-h) will return for Conditional review by a Regional Manager: **(e) "Other" categorized Bankruptcies (f) Landlord debt/Rental history balances (g) Unpaid gas, electric, water and sewer utility accounts (h) Fraud Alerts.** Conditional approval may be considered if applicant provides verifiable evidence that their Landlord debt/Rental balance and/or Utility balance(s) have been paid in full. Should an applicant be approved with conditions, a double security deposit is required.
- **CRIMINAL BACKGROUND CHECK:** All applicants eighteen years old or over must successfully pass an investigative criminal background check. Parents/guardians of minors (under the age of 18) must also certify that the minor household members do not have a criminal record. Misdemeanors and Felonies are scored using the same criterion, under a 5 - 10 year look back period. With the exception of crimes against people, children, and society, including weapon & Felony drug charges, the look back period is indefinite, all years. Minor Low-level crime categories such as traffic, civil court records, transportation i.e.: speeding / expired tags, animal vaccination & fish & game licensing, public gaming & wagering, ordinances i.e.: fireworks/littering, and improper telephone usage or possession of access device, will not be scored or considered.
- **PRIOR LANDLORD REFERENCE:** Applicants who meet the income, credit & background qualifications can also be denied based on a poor landlord reference under the following (a-e) categories: **(a) Three (3) or more late payments during past twelve (12) months; (b) Being evicted in the past twenty-four (24) months for non-payment of rent or violation of rental policy; (c) Three (3) or more Eviction Filings less than or equal to twelve (12) months (d) Statement from a prior landlord that they would not re-rent due to lease violation(s), number of late rental payments, or non-payment; (e) Unpaid Landlord debt/ Rental history balance(s).**
- **MINIMUM INCOME REQUIREMENTS: (1) Applicants 18-61** must be employed or provide proof of anticipated employment, unless disabled, or participating in an approved special needs program. Households must have gross income of 2½ times the resident paid rental rate. **(2) Elderly 62+ or Disabled Applicants** gross income must be at least 2 times the resident paid rental rate.
- **IDENTIFICATION:** All Applicants eighteen (18) or older must present picture identification (ID) issued by a local, state, or federal government agency, (i.e., driver's license, valid passport, travel visa, etc.) Applicants must also provide a US issued Social Security card for credit screening purposes. If a Social Security card has not been obtained, an Individual Taxpayer Identification Number (ITIN) may be considered. All provided forms of identification must be valid through the term of the lease.
- **MANAGEMENT OCCUPANCY STANDARDS:** Columbia Residential is required to establish reasonable occupancy standards that will assist as many people as possible, without overcrowding, underutilizing unit space, and minimizing vacancies. Qualified applicants may move in if a housing unit of acceptable size is available.
 1. The **Minimum Occupancy Allowed** is 1 person per bedroom when receiving a subsidy
 2. The general **Maximum Occupancy Guidelines are 2 persons per bedroom**
- **RELEASE & CONSENT:** Applicants eighteen (18) or older must sign a consent form giving Management

permission to communicate with employers(s), financial institutions, government agencies, or other sources as applicable for the purpose of determining eligibility.

- **APPLICATION PROCESS:** Applicants eighteen (18) or older must complete an application form and report all household income & assets. Completed applications will be reviewed for eligibility under the applicable housing program(s) in effect for the property for which application for residency applies. All Applicants must confirm that there has been no change to household
 - status (i.e., income, assets, occupancy, etc.) declared on the application as of the date of the effective date of the lease. An applicant's credit, criminal background, income, and rental history are part of the household's overall score of which determines a pass, fail or conditional decision.
- **ACCURACY OF INFORMATION:** Information the Applicant supplies must be true and complete and made in good faith. Any willful false statements or failure to provide satisfactory, complete and accurate information (regardless of whether inaccuracy is intentional or unintentional) will be denied on the basis of falsification. In addition, refusal to comply with a request for information shall constitute cause for immediate rejection of the application or lease termination by Management.
- **HANDICAP ACCESSIBLE UNITS:** Management actively markets accessible units to persons with disabilities, and priority for leasing accessible units is given to those needing these special design features. Should Management not receive an application to lease an accessible unit from an eligible Applicant, the unit may be leased to a non-eligible Applicant. If Management receives a request to lease the accessible unit from an eligible priority Applicant, Management will give the non-handicap household occupying the accessible unit a 30-day notice to transfer to another suitably sized unit within the community, should an appropriate unit become available.
- **DRUG- FREE HOUSING:** All applicants eighteen (18) or older must have the ability and willingness to consent to comply with the drug free housing policy. Resident is responsible for actions of all household members and their guests. Activity that includes, but is not limited to, the possession, sale, and use of illegal substances or weapons is an automatic violation of the lease and grounds for immediate termination by Management.
- **LEASE EXECUTION:** All occupants eighteen (18) or older must sign the lease agreement, except dependent occupants (e.g., claimed on parent's tax return) 18 or older who are full-time students and are not financially responsible for the lease.
- **REJECTED APPLICATIONS:** If an applicant fails to meet the eligibility requirements as described in the Resident Selection Criteria, a letter disclosing the reason for denial will be mailed. Applicants have the right to submit a written appeal to management for potential reconsideration within 14 days of denial. Applicants must provide proof of reformation. Falsification of any part of the application and /or providing false documents or statements, will not be reconsidered.
- **REASONABLE ACCOMMODATION:** It is the intention of Columbia Residential to make reasonable accommodations both in the application process and during residency in accordance with the HUD Handbook 4350.3, Fair Housing Act, and other relevant civil rights laws and statutes.
- **LIVE-IN AIDE:** The definition of a live-in aide is a person who resides with one or more persons with disabilities who is (1) determined to be essential to the care and well-being of the persons; (2) is not obligated for the support of persons; and (3) would not be living in the unit except to provide the necessary supportive services. The Live-In Aide must provide proof of current, separate residency from the applicant. In accordance with this definition, a live-in aide cannot be a spouse and are not entitled to occupancy as a remaining member of the tenant family. Verification of need must be obtained through a certified health care professional. Live-in aides will be subject to criminal background checks at the household's initial and annual recertification.
- **CONSIDERATION OF EXTENUATING/MITIGATING CIRCUMSTANCES:** Management may consider extenuating/mitigating circumstances in evaluating information obtained during the screening process to assist in determining the eligibility of an applicant. Management will require evidence of the applicant's ability to meet the obligations of tenancy.

IRC SECTION 42/TAX CREDIT RENTAL STANDARDS:

Section 42 tax credit guidelines for designated units:

- **INCOME VERIFICATION:** Management must be able to confirm employment and reported salary listed on the application(s). All income & asset sources must be verified in accordance with the HUD Handbook 4350.3, IRC Section 42, HOME, and other programs applicable to the property for which application is being made. Non-W-2 employees must provide documentation that they have been in business for a minimum of six full months and the self-employed income has been reported and claimed on the tax return by providing a copy of the prior year's tax transcript obtained by the IRS and, when needed, IRS 1040 form with schedules. If a tax return is due and has not been filed, the applicant will automatically be denied. If newly self-employed, a minimum of six full months of active engagement is required and a Profit and Loss Statement prepared by a CPA or other documented accounting professional must be submitted for consideration as proof of income.
- **INCOME LIMITS:** Applicants applying for units designated under the Section 42 program cannot make over the applicable HUD maximum allowable income limits determined by household size.

- **STUDENTS:** An applicant's household cannot be entirely occupied by fulltime students. Applicants cannot be, or expect to be, fulltime students for any five (5) month period of time within a twelve (12) month calendar year. If all household members are full-time students, the household must meet at least one of the applicable exceptions. In HOME programs a part-time student may not qualify. A student affidavit must be completed.

**PUBLIC HOUSING (PHA)/PROJECT BASED RENTAL ASSISTANCE (PBRA)/HOUSING CHOICE VOUCHER (HCV)
RENTAL STANDARDS:**

In addition to the General Rental Standards listed above, the following guidelines apply:

1. **WAITING LIST:** The site must maintain a site based waiting list for PHA and PBRA units. Periodically, the site based waiting list is
 1. opened and Management must advertise open waiting lists in the classified or legal section in a local publication. The advertisement will include an open and close date for taking pre-applications, as well as the office hours applications will be taken. Once the waiting list period is closed, no further applications can be added to the waiting list. For any reason until the list is exhausted and opened again. The order of the applicants is randomized, then the site-based waiting list is maintained in the community leasing office. As units become available, the waiting list is used to contact the next household for the specific bedroom size of the available unit. Placement of an applicant on the waiting list does not denote final tenant selection. All applicants must meet set criteria after fully processing all application and verification documents.
2. **INVITATION TO APPLY:** Management may call the next available applicant on the waiting list, but must always send a written notice to the mailing address on record. The applicant has **ten (10) days** from the date on the notice to respond to the leasing office to accept or decline the invitation.
 - If the invitation to apply is Accepted**, the applicant must appear in person and apply within **ten (10) days**. A full application must be completed at the time the unit is available to determine the applicant's eligibility.
 - If the invitation to apply is Declined**, the applicant may choose to remove themselves from the waiting list or choose to be moved to the bottom of the waiting list. If the applicant chooses to remain on the waiting list, at the second invitation to apply, the applicant must apply for the available unit, or they will be removed from the waiting list.
 - If there is no response to the phone call or written notice of invitation to apply with ten (10) days**, the applicant is moved to the bottom of the waiting list. At the second invitation to apply, the applicant must apply for the available unit, or they will be removed from the waiting list.
 - If the applicant chooses to be removed from the waiting list or is removed from the waiting list**, the applicant may choose to re-apply once the waiting list is opened at a later date
3. **VIOLENCE AGAINST WOMEN ACT (VAWA):** The law offers protections against eviction or denial of housing assistance based on domestic violence, dating violence or stalking if the applicant otherwise qualifies for assistance or admission.
4. **CITIZENSHIP REQUIREMENTS - SYSTEMATIC ALIEN VERIFICATION for ENTITLEMENTS (S.A.V.E.):** Only U.S. citizens or eligible non- citizens are eligible to receive assistance. Applicants must certify the citizenship status of all household members
5. **SOCIAL SECURITY NUMBER:** All household members must provide proof of Social Security numbers of all family members at least 6 years of age and older
6. **HOUSING CHOICE VOUCHER (HCV):** Columbia Residential participates in the Housing Choice Voucher program. With the exception of gross income, Housing Choice Applicants must adhere to all selection criteria (employment, credit, criminal, landlord, and housing inspection) for consideration.
7. **PROJECT BASED RENTAL ASSISTANCE (PBRA) or PUBLIC HOUSING (PHA) Units:** Applicants must adhere to the **Atlanta Housing Authority (AHA) CATALYST/MOVING TO WORK** guidelines as follows:
 - a) At least one adult household member 18-61 is legally employed at least 30 hours per week (with income at least the equivalent to minimum wage x 30 hours per week) at all times while participating in the Project Based Rental Assistance (PBRA) or Public Housing (PHA) subsidy programs, and
 - b) All other adult household members 18-61 are legally employed for 30 hours, or can document a combination of employment, and training, or attendance at a recognized school or institution equal to 30 hours per week.
8. **HOUSEHOLD INSPECTIONS:** A PBRA/PHA applicant who meets the income, credit, and landlord qualifications may be disqualified based on the results of a housekeeping inspection of their current residence. Their current residence will be inspected prior to official applicant approval and move-in. The applicant must set an appointment within 48 hours of being contacted by site team or 3rd party vendor. The inspector must be given access to the entire home for inspection. Failure to set an appointment within 48 hours or denying access to the entire home will result in denial of the rental application.

SPECIAL NEEDS PROGRAMS/HOMELESS DEMONSTRATION PROGRAMS CRITERIA:

- Convictions for non-violent felonies will not preclude a household from considerations.

- ? Evictions will not preclude a household from consideration unless they have lost a voucher due to Housing Authority rule violations.
- ? Applicants must be employed within 12 months unless elderly or disabled.

HOUSEHOLD VERIFICATION REQUIREMENTS: (ENTERPRISE VERIFICATION SYSTEM (EIV) PUBLIC HOUSING PROGRAMS FOR PBRA & PHA

Applicants.

WHAT IS EIV INFORMATION USED FOR?: The information in the EIV system (1)Confirms your name, date of birth, and Social Security number with SSA; (2)Verifies the reported income sources and amounts; (3)Confirms participation in all HUD rental assistance programs; (4)Confirms any outstanding debt to any PHA or negative status for previous residency under the Public Housing or Section 8 program; (5)Verification of deceased household members. Failure to respond to Management requests for additional information and/or providing false or incomplete information will result in denial of your application and removal from the waiting list. Unintentional errors that do not cause preferential treatment will not be used as a basis to deny assistance.

CONSENT FORMS: If any adult (18 or older) household member refuses to sign a consent form, your request for initial or continued rental

assistance may be denied and you may be terminated from the rental assistance program. Within 30-days of an occupant turning 18, Management will forward a request for the occupant to sign the required consent forms prior to the next scheduled re-examination.

1. All **PBRA/PHA** applicants must provide a valid Social Security number except for (1) Applicants who acknowledge on the Citizen Declaration form that they are eligible non-citizens, or (2) Elderly Existing program participants who had not previously disclosed a valid SSN.
2. All **PBRA/PHA** applicants eighteen (18) or older must complete HUD form 9886, Authorization for the Release of Information/Privacy Act Notice authorizing Management to request and verify income information to ensure your household is eligible for assisted housing benefits and that the benefits are set at the correct level. The information will not be disclosed or released, except as permitted or required by law.
3. All **PBRA/PHA** applicants eighteen (18) or older must complete HUD form 9887, Notice and Consent for the Release of Information, authorizing Management to request and obtain income information from the federal and state agencies for the purpose of verifying household eligibility and level of benefits under HUD's assisted housing programs.
4. All **PBRA/PHA** applicants eighteen (18) or older must complete HUD form 9887-A, Applicant's Consent to the Release of Information, which authorizes Management to request information from a third party source about you including current or previous employers, to verify salary and wage information pertinent to determine household eligibility and level of benefits under HUD's assisted housing programs.
5. All **PBRA/PHA** applicants eighteen (18) or older must complete HUD form 52675, Debts Owed to Public Housing Agencies and Terminations authorizing Management to verify at the time of application for rental assistance and reexamination of family income and composition whether you were previously housed in a unit with rental assistance under a HUD program to determine a family's suitability for initial or continued rental assistance.

EIV REQUIRED REPORTS PRIOR TO MOVE-IN – All Occupants 18 or Older:

****No adverse action can be taken against the Resident based on EIV data until the information is verified by another source****

1. **Existing Tenant Report** – Prior to processing the application Management is required to generate the Existing Tenant Report to determine if any member of the Applicant household may be receiving HUD assistance. All Applicants **MUST** disclose if they are currently receiving HUD housing assistance. Any Applicant, who fails to fully and accurately disclose receipt of HUD assistance or rental history on the application, will be denied based upon misrepresentation of information. Management must confirm all positive results with the Housing Authority management agent and notify them of your application to this community. The Applicant will be notified of any positive verification of subsidy.
2. **Debt Owed / Former Tenant Search** – Prior to processing the application, Management will generate the Former Tenant Search report to determine if any member of the applicant household may owe an outstanding debt or have any negative status with any PHA in any state or U.S. territory. If a negative action is listed in the report, the Applicant must provide verification that the issue(s) are resolved within 5 business days in order to retain current eligibility on the waitlist. All drug-related issues noted in the report are immediate grounds to terminate the application process and removal on the waitlist.
3. **Terminations Database (AHA Communities only)** – Management must search the Atlanta Housing Authority portal for any tenant records of terminations from AHA programs. If a negative action is listed in the report, the Applicant must provide verification that the issue(s) are resolved within 5 business days in order to retain current eligibility on the waitlist. All drug-related issues noted in the report are immediate grounds to terminate the application process and removal on the waitlist.

Management provided a copy of the brochure "What you Should Know About EIV" & EIV Policies &

Procedures

Applicant Initials

PRIVACY POLICY: It is our policy to protect the privacy of individuals covered by the Federal Privacy Act of 1974, and to ensure the protection of such individuals' verification records maintained by the property. This privacy policy in no way limits our ability to collect such information as it may need to determine eligibility, compute rent or determine an applicant's suitability for tenancy.

By signing this document, the below named acknowledges understanding of the terms and conditions stated herein.

Applicant's Signature	Date	Applicant's Signature	Date
Applicant's Signature	Date	Applicant's Signature	Date
Management's Signature	Date		

General EIV Administration

Enterprise Income Verification (EIV) Policies & Procedures

Attachment to the Resident Selection Criteria

The Enterprise Income Verification (EIV) system serves as a source for income and benefit data, securely accessible over the internet, for use by Public Housing Authorities and Management Agents administering multi-family housing assistance programs to improve the accuracy of rent and income determinations.

Columbia Residential will not knowingly assist applicants who will maintain a residence in addition to the HUD-assisted unit.

EIV reports will be produced and reviewed by staff responsible for:

1. HUD eligibility determination
2. HUD discrepancy analysis
3. Verification of employment and income at move-in and re-examination
4. HUD compliance monitoring
5. HUD compliance training

Reports will be produced, secured and maintained in accordance with the property's EIV Security Policy. When information in EIV indicates potential errors in the eligibility determination or assistance calculation, documentation of the investigations of such errors will be maintained in:

1. The tenant/applicant file
2. The EIV Discrepancy Log/Master File

Consent for the Release of EIV Information

A current form **HUD form 9887, Notice and Consent for the Release of Information & HUD 9887-A, Applicant's Consent to the Release of Information** will be on file before accessing the employment or income data contained in EIV for a tenant. This form will be signed and dated by each adult member of the household, the head of household, spouse or co-head, regardless of the age, and each family member who is 18 years of age or older. Tenants must follow the requirements in their lease for reporting changes in the household income. If the tenant, who turns 18, fails to sign the consent form(s) at the household's next recertification, the household will be in non-compliance with their lease and assistance to, and the tenancy of the household may be terminated in accordance with HUD guidelines.

A current form **HUD form 52675, Debts Owed to Public Housing Agencies and Terminations** will be on file for all adult occupants. This form authorizes Management to verify information during the time of application for rental assistance and reexamination of family income and composition for exiting participants through the Enterprise Income Verification system (EIV). Management will have access to whether you were previously housed in a unit with rental assistance under a HUD program to determine a family's suitability for initial or continued rental assistance.

Consent to Disclose an Individual's Information to another Person or Entity

A current form HUD form 9886, **Authorization for the Release of Information/Privacy Act Notice** will be on file for all adult occupants. The EIV data of an adult household member will not be shared (or a copy provided or displayed) with another adult household member or to a person assisting the tenant with the recertification process, unless the individual has provided written consent to disclose such information. With the written consent of the tenant, EIV may be shared with persons assisting the tenant with the recertification process.

Parties to whom the tenant can provide written consent include:

1. Service Coordinators (only if they are present at and assisting the tenant with the recertification process)
2. Translators/Interpreters
3. Individuals assisting an elderly individual or a person with a disability
4. Guardians
5. Powers of Attorney
6. Other family members

Disclosure of EIV information to these parties will be employment or income information pertaining only to the tenant who has provided his/her consent. The signed consent form will be maintained in the tenant file.

Management will monitor the age of the household members. When an occupant turns 18 years old, a notice will be forwarded to obtain the signature of the required consent forms to update the file.

EIV Reports

The EIV report will be generated prior to move-in, at interim recertification, and at each annual certification.

Prior to Move-in

Existing Tenant and Applicant Notification

Existing tenants and applicants will be notified of the implementation of EIV through the Resident Selection Plan and the HUD EIV and "You" pamphlet. Existing tenants will be offered the HUD EIV and "You" pamphlet again at least annually as part of the recertification process and Initial Applicants will be provided the HUD EIV and You pamphlet before move-in.

Existing Tenant Report – Maintained in the Applicant file

Policy: All applicants must disclose if they are currently receiving HUD housing assistance.

1. Management will use the Existing Tenant Report to determine if the applicant or any member of the applicant household may be receiving HUD assistance.
2. **(AHA Communities Only)** Management will use the Terminations Database
3. Management will follow-up with the respective PHA or Owner/Agent to confirm the individual's program participation status before admission.
4. If the report indicates a possible double subsidy situation, Management will discuss this with the applicant/tenant and if necessary the PHA or other O/A before admitting the applicant or recertifying the tenant.
5. Failure to respond to requests for additional information and/or providing false or incomplete information will result in denial and removal from the waiting list in accordance with the property's current Tenant Selection Plan. Unintentional errors that do not cause preferential treatment will not be used as a basis to deny assistance.

Debt Owed / Former Tenant Search – Prior to processing the application, Management will generate the Former Tenant Search report to determine if any member of the applicant household may owe an outstanding debt or have any negative status with any PHA in any state or U.S. territory. If a negative action is listed in the report, the Applicant must provide verification that the issue(s) are resolved within 5 business days in order to retain current eligibility on the waitlist. All drug-related issues noted in the report are immediate grounds to terminate the application process and removal on the waitlist.

After to Move-in Income

Report

Within 60-days of move-in and prior to each recertification, Management must generate the Income Report. The Income Report provides employment and income information on Residents currently participating in rental assistance programs. The report will include the following on household members:

1. New employment
2. Quarterly wage information for past or current employment
3. Unemployment compensation benefits received
4. Social Security benefits received
5. Identity Verification through the Social Security Administration

6. Income Discrepancy**

Management is required to review and resolve any discrepancies included in the Income Discrepancy Report to identify any unreported or underreporting of income by the Resident on current or historical certifications. The Resident will be required to provide verification to resolve the issue within 30-days.

Management will also have access to the following reports:

1. **Multiple Subsidy Report** – This report will search the Public Housing database to identify individuals who may be assisted in another location. The Resident will be required to provide verification to resolve the issue within 30-days.
2. **Deceased Tenant Report** – This report identifies individuals participating in rental assistance programs who are reported by SSA as being deceased. In the case where the Resident is not deceased, the Resident will be required to contact the SSA to resolve the issue within 30-days.

Investigating & Resolving Discrepancies

When a discrepancy is discovered, Columbia will not deny, suspend or reduce any benefits of an Applicant/Resident until these steps have been taken. A notice will be forwarded to the Applicant/Resident and, the Applicant/Resident will be required to meet with the Management staff within 3 business days of the notice or face termination of subsidy up termination of the lease agreement. If a discrepancy is found, Management will take all appropriate steps

to verify through third party sources information relating to:

1. The amount of the wages, other earnings or income, or unemployment compensation involved
2. Whether the Applicant/Resident actually has (or had) access to such wages, other earnings and income, or benefits for his or her own use.
3. The period (or periods) when, or with respect to which, the Applicant/Resident actually received such wages, other earnings and income or benefits
4. The Applicant/Resident's requirement to report.**

The Applicant/Resident is required to report when:

1. The employment status of an adult member of the household changes (employed to unemployed or unemployed to employed)
2. The household income cumulatively increases by \$200 or more per month
3. There is a change in household composition

If the Applicant/Resident disputes the discrepancies listed in the report(s), the Applicant/Resident must sign the appropriate verification consent and release forms. Management will attempt to verify the information contained in the EIV report. If all attempts to verify the EIV data (up to 10 business days) are unsuccessful, the Applicant/Resident must contact the State Workforce Agency to have the employer or agency remove the invalid income information from his/her records

While EIV provides valuable information, there will be cases when information in EIV is inaccurate. Inaccuracies can be caused by both human error, database sharing issues and in some cases, fraud.

Repayment Agreement

In the case the discrepancy is due to unreported or underreported income, Management will calculate the rental difference and the Resident will be obligated to reimburse Management for the difference between the rent he/she should have paid and the rent that was charged in addition to the family's regular rent contribution.

If the Resident is unable to pay the amount due, Management may enter into a repayment agreement with the Resident to collect the funds over a specific period of time. PHA-sponsored amnesty or debt forgiveness programs are not permitted under HUD guidelines. If Management finds that the household is in non-compliance because he/she knowingly reported inaccurate information, the rental subsidy and lease term will be terminated.

Tenant Notification of Recertification

All households participating in rental assistance programs are required to recertify their household income and composition annually. Management will provide a reminder notice informing initial Residents of their responsibility to provide Management with information about change in family income or composition. The notice will include a list of documents the Residents are required to provide at the recertification interview. Having the necessary documentation available at the time of the recertification interview will save time in complete the recertification process. The initial recertification notice will be provided when the lease documents are signed.

Retention of EIV Reports - Management will retain EIV reports as follows:

1. Results of the Existing Tenant Search, Former Tenant Search, and Terminations Database search will be retained with the application:
 1. If applicant is not admitted, the application and search results will be retained for three years.
 2. If applicant is admitted, the application and search results will be retained in the tenant file for the term of

tenancy plus three years.

2. The 50058 Report, Income Report, the Household Summary Report showing Identity Verification Status as "Verified" and the Income Discrepancy Report with supporting documentation will be retained in the tenant file for the term of tenancy plus three years.
3. Any tenant provided documentation, or other third party verification of income, received to supplement the SSA or NDNH data will be retained in the tenant file for the term of tenancy plus three years.

Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly making false statements or misrepresentation to any department or agency of the United States.