

EXHIBIT 22

Bastrop Housing Authority PHA POLICY AND PROCEDURES FOR COMPLIANCE WITH Notice PIH 2010 -19 (HA) Mandated Use of the Enterprise Income Verification (EIV) System

Requirement

PHA Policy updated to comply with the December 29, 2009, HUD issued on the final rule Entitled Refinement of Income and Rent Determination Requirements In Public and Assisted Housing Program: Implementation of the Enterprise Income Verification (EIV) System – Amendments, which requires PHAs to use the EIV system in its entirety to verify tenant employment and income administrative and subsidy payment errors in accordance with 24CRF 5.236 and administrative guidance issued by HUD.

The EIV System

The EIV System is a web-based application, which provides PHAs with employment, wage, unemployment compensation and social security benefit information of tenants who participate in the Public Housing and various Section 8 programs under the jurisdiction of the Office of Public and Indian Housing (PIH). Information in EIV is derived from computer matching programs initiated by HUD with the Social Security Administration (SSA) and the U.S. Department of Health and Human Services (HHS), for all program participants with valid personal identifying information (name, date of birth (DOB), and social security number (SSN) reported on the form HUD-50058.

HUDs Requirements for PHAs

The three areas of requirements for PHAs as it relates to EIV are as follows:

- 1) System Security and data security**
- 2) Monitoring**
- 3) Reporting**

Special Security

All PHA staff (including PHA-hired management agents), who have a need to access the EIV system complete and submit the EIV Authorization Form & Rules of Behavior and User Agreement to their designated EIV Coordinator in the local HUD office.

The PHAs user's access must be approved by the PHA Executive Director or designee (for smaller PHAs the Board Chairman would be the approver). PHA staff who will not need direct access to the system, but will have access to the EIV data must have a completed Access form maintained in the PHA's EIV file. **Based on HUD guidance these user access forms are not submitted to the local HUD office for this type of access).**

In order to meet HUD EIV Security requirements the PHA will:

- Maintain copies of the User Authorization Forms and Certifications of Completions for all users.
- Ensure that all EIV users completing Security Awareness training.
- Conduct **quarterly** review of User IDs and update any access changes in HUDs Secure System.
- Complete security **annual** security awareness training for all EIV Authorized Users.
- Maintain User Authorization records.
- Report to HUD immediately any evidence of unauthorized access of known security breaches.

Privacy Protection Policy – for protection of data retrieved from EIV

1. PHA will use EIV resident data to verify a resident's eligibility for participation in the Public Housing, Section 8 Moderate Rehabilitation, Project-Based Voucher, Project-Based Certificate, and Housing Choice Voucher Programs to determine the level of assistance for which resident is eligible.
2. PHA will protect Data provided via EIV System to ensure that information is used only for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data.
3. In compliance with HUD requirements, the PHA will
 - A. Maintain and enforce security procedures
 - B. Keep individual tenant information secured and not accessible to public.
 - C. Keep EIV general information reports secured and not accessible to public.

PHA will safeguard the integrity of tenants EIV information by the following process:

1. All employees issued keys to access area or file cabinets which contain tenant files and EIV reports will complete a form acknowledging receipt of keys. A log will be kept showing name and date that the key was issued and the date that the key is returned.
2. Work area of staff authorized to research and download EIV reports and other privacy-sensitive information will be shielded from the public.
3. Unauthorized PHA staff will not have access to work station or computer of any authorized staff.
4. PHA staff will not leave resident files on counters and desk tops or leave computer screens open with sensitive data unattended. Files will be locked in desk or file cabinets and computer screens cleared before staff leaves his/her desk for any reason.
5. PHA staff will remove EIV printouts from printer immediately.
6. PHA will keep a log of all documents shredded, including name of employee disposing of document, description of document, method of disposal and date of disposal.
7. PHA staff will ensure that resident files are locked in file cabinets or locked file room at the close of each business day.
8. Any combination locks used for security purposes will be reset as needed due to staff turnover.
9. Security procedures will be reviewed with staff on a yearly basis to safeguard against laxity and breaches.

Monitoring of Tenant Data

The PHA will use all features of the EIV system to:

- a. Verify tenant employment and income information during mandatory reexaminations of family composition and income in accordance with 24 CFR §5.236, and HUD administrative guidance; and
- b. Reduce administrative and subsidy payment errors in accordance with HUD administrative guidance.
- c. PHA will monitor the "Debts Owed Module" by completing the search of former tenants during the new admission process.

At the scheduled reexamination process the PHA will access the EIV system and obtain an Income Report for that household. The PHA will maintain the Income Report in the tenant file along with the form HUD-50058 and other supporting documentation to support income and rent determinations for all mandatory annual reexaminations of family income and composition.

In the event that the EIV Income Report does not contain any employment and income information for the family, the PHA will attempt the next lower level verification technique, as noted in Notice PIH 2010 - 19 (HA). **Subject: Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System.**

The Verification Hierarchy. PHAs should begin with the highest level of verification techniques. If the EIV Income Report does not contain any employment and income information for the family, the PHA should attempt the next lower level verification technique, as noted in the below chart.

Level	Verification Technique	Ranking
6	Upfront Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system (not available for income verifications of applicants)	Highest (Mandatory)
5	Upfront Income Verification (UIV) using non-HUD system	Highest (Optional)
4	Written third Party Verification	High (Mandatory to supplement EIV-reported income sources and when EIV has no data; Mandatory for non-EIV reported income sources; Mandatory when tenant disputes EIV-reported employment and income information and is unable to provide acceptable documentation to support dispute)
3	Written Third Party Verification Form	Medium-Low (Mandatory if written third party verification documents are not available or rejected by the PHA; and when the applicant or tenant is unable to provide acceptable documentation)
2	Oral Third Party Verification	Low (Mandatory if written third party verification is not available)
1	Tenant Declaration	Low (Use as a last resort when unable to obtain any type of third party verification)

Note: This verification hierarchy applies to income determinations for applicants and participants. However, EIV is not available for verifying income of applicants.

To ensure that the PHA is aware of potential subsidy payment errors, PHA will review **monthly** the following EIV reports:

1. Deceased Tenants Report
2. Identity Verification Report
3. Immigration Report

PHA will work to resolve any discrepancies within the next quarter. PHA will maintain copies of these reports and copies of attempts to resolve issues in a file or EIV binder. PHA will address the substantial difference discrepancy of \$2400 annually.

To ensure that the PHA is aware of potential subsidy payment errors, PHA will monitor the following EIV reports on a **quarterly** basis:

1. Income Discrepancy Report resolve \$2,400 plus discrepancy
2. Multiple Subsidy Report
3. New Hires Report (if your agency has an interim increase policy)

PHA will work to resolve any discrepancies within the next quarter. PHA will maintain copies of these reports and copies of attempts to resolve issues in a file or EIV binder.

Reporting Tenant Data

PHA will meet the Tenant Data Reporting Requirement compliance by the following reporting:

1. **Timeliness of the required HUD Form 50058 submission**
2. **Updating the "Debts owed PHA" Module in the EIV System.**

The PHA will meet the file documentation requirement to demonstrate PHA compliance with mandated use of EIV as a third party source to verify tenant employment and income information by completing the following for the HUD-50058 submissions:

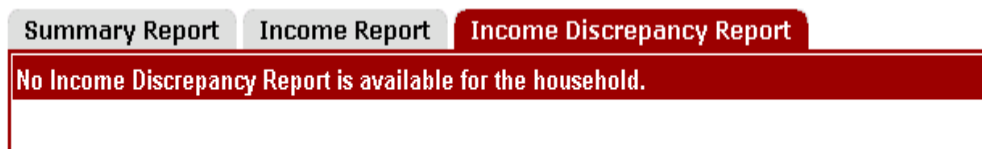
- A. For each **new admission** (form HUD-50058 action type 1), the PHA is required to have the following documentation in the tenant file:
 - i. The EIV Income Report to confirm/validate family-reported income within 120 days of the PIC submission date; and
 - ii. Print and maintain a copy of the EIV Income Report in the tenant file; and
 - iii. Resolve any income discrepancy with the family within 60 days of the EIV Income Report date. **(substantial difference \$2400 annually)**
 - iv. Check the debts owed report

B. For each historical adjustment (form HUD-50058 action type 14), the PHA is required to have the following documentation in the tenant file:

- i.** The EIV Income Report to confirm/validate family-reported income within 120 days of the PIC submission date; and
- ii.** Print and maintain a copy of the EIV Income Report in the tenant file; and
- iii.** Resolve any income discrepancy with the family within 60 days of the EIV Income Report date. **(substantial difference \$2400 annually).**

C. For each interim reexamination (form HUD-50058 action type 3) of family income and composition, the PHA is required to have the following documentation in the tenant file:

- i.** **ICN Page** when there is **no** household income discrepancy noted on the household's Income Discrepancy Report tab or Income Discrepancy Report. (PHAs have the discretion to print the EIV Income report, however, only the ICN page is required.) See sample screen shot below.



Note: The ICN Page is available from the Summary Report tab. See sample screen shot below:

Summary Report Certification Page Income Report Income Discrepancy Report

Head of Household Identifiers

Name: MIKILA
 Social Security Number: ***-**-****
 Date of Birth (mm/dd/yyyy): XX/XX/1989
 Program Type: Sec. 8 Vouchers
 Project:
 Unit Address:
 Participant Code:
 Annual Reexamination Date: 05/01/2010
 Tenant Data from Form 50058 as of: 10/20/2009
 Most Recent Type of Action: 3-Interim Reexamination
 Effective Date: 10/01/2009

Household Members


Member SSN	Member First Name	Member Last Name	Date of Birth	Age	Relationship	Identity Verification Status
-**-*	MIKILA		XX/XX/1989	20	Head	Verified
-**-*	MALAYA		XX/XX/2009		Other youth under 18	Verified

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

[Provide ICN](#)

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

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- ii. *EIV Income Report* when there is an income discrepancy noted on the household's *Income Discrepancy Report* tab or *Income Discrepancy Report*. See sample screen shot below.

Summary Report Income Report **Income Discrepancy Report**

Head of Household Information

Name: DEBRA
 Social Security Number:
 Program Type: Public Housing
 Project:
 Effective Date of Action: 03/10/2009
 Annual Reexamination Date: 02/01/2010
 Projected Annual Wages and Benefits from Form HUD-50058: \$8,328.00
 Period Of Income for Discrepancy Analysis: 12/10/2007 - 12/09/2008

Discrepancy Analysis	Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$24,919.06	\$26,131.00
Amount of Annual Income Discrepancy:	(\$16,591.06)	(\$17,803.00)
Amount of Monthly Income Discrepancy:	(\$1,382.59)	(\$1,483.58)
Percentage of Income Discrepancy:	(66.58%)	(68.13%)

Note: Negative numbers represent potential under reporting of income. Please discuss this income discrepancy with the tenant. Positive numbers represent potential decrease in tenant income.

Confidential Privacy Act Data. Civil and Criminal penalties apply to misuse of this data.

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D. For each annual reexamination of family income and composition, the PHA is required to have the following documentation in the tenant file:

- i. No Dispute of EIV Information:** EIV Income Report, current acceptable tenant-provided documentation, and **if necessary** (as determined by the PHA), traditional third party verification form(s)
- ii. Disputed EIV Information:** EIV Income report, current acceptable tenant-provided documentation, and/or traditional third party verification form(s) for disputed information.
- iii. Tenant-reported income not verifiable through EIV system:** Current tenant-provided documents, and **if necessary** (as determined by the PHA), traditional third party verification form(s).

PHA will meet the required updating of Tenant Debts Owed Module in EIV in the following manner.

- **Ensure that that all household members have current Form 9886 signed in their file**
- **Ensure that all files have required signed documentation by tenants relating to the update of PHA data to the EIV Debts Owed Module**
- **Ensure that any information entered into the Debts Owed Module has supporting documents of the 30 notice to tenant as it relates to the debts owed input.**

Date Policy Adopted by Board 06/30/2015

Bastrop Housing Authority does not discriminate against persons on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities.