

Chapter 10

VERIFICATION

IHFA will verify information related to waiting list preferences, eligibility, admission and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations, full-time student status of family members 18 years of age and older, Social Security numbers, citizenship/eligible non-citizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

All applicants, 18 years old and older will be required to furnish photo identification at the time of their formal application, or when being added to an existing household. Existing household members who are under the age of 18 will be required to furnish photo identification when they turn 18 years of age. Acceptable forms of photo identification include:

- A. Veterans or military identification card
- B. Passport
- C. Valid INS card or documents
- D. Valid driver's license
- E. State issued identification card
- F. State issued concealed weapons permit
- G. Current student identification card (other identification is required to verify date of birth)

10.1 ACCEPTABLE METHODS OF VERIFICATION

IHFA's preferred method of verification will be UIV (Upfront Income Verification) and will be considered the highest level of verification. This type of verification includes EIV, State of Idaho IBES system, Idaho Child Support Enforcement system, and The Work Number. When verifying employment income, supporting documents will be required. **See Appendix G for IHFA's Section-8 HCV EIV Policy and security.**

When income information is not available in EIV, supporting documents cannot be obtained by the applicant/participant, or when income information contained in EIV is disputed, IHFA will use third party written (hand-carried) verification. This form of verification is original or authentic documents supplied by the applicant/participant, which must be dated within 60-days of IHFA's request. Documents supplied by the participant may be rejected if they are not original, appear altered, mutilated, not legible, or appear to be forged.

The next level of verification may be IHFA generated documentation (with forms sent directly to and received directly from a source, not passed through the hands of the family). This verification may also be direct contact with the source, in person or by telephone, fax, or email. In the event there are discrepancies or questions about the content of a completed verification, IHFA will contact the individual who filled out the form via telephone to clarify the information. Verification forms and reports received will be maintained in the applicant/participant file. Oral third-party documentation will include the same information as if the documentation had been written, i.e., name, date of contact, and amount received. Documentation will be added to the verification form to explain why the highest level of verification was not used.

When third party verification cannot be obtained via EIV, mail, phone, fax or email, IHFA will accept applicant/participant declaration, but only as a last resort. Documentation will be maintained in the file as to why third-party verification was not possible.

Eligibility: Age, relationship, U.S. citizenship, and Social Security Numbers will generally be verified with documentation provided by the family. For U.S. citizenship, the family's certification on the Declaration of Citizenship will be accepted. Disclosure and documentation of Social Security Numbers for all household members must be provided before admission to the program. Verification of these items will include photocopies of original Social Security cards and other documents presented by the family. Eligible immigrants will be required to provide original INS documentation (staff is required to view original INS documents and make copies for the file). (See section 10.4 for more information regarding verification of citizenship or eligible non-citizen status.)

Income: Effective November 1, 2009, IHFA will use Enterprise Income Verification (EIV) plus supporting (hand-carried) documents as the primary third-party source to verify income from wages. IHFA's policy is that supporting documents must be in the form of the most recent two (2) months current, consecutive paystubs, computer generated wage printout, or a letter from an employer detailing hours, wage amount, and frequency of pay for income from wages. HUD regulations specify a minimum of two (2) paystubs. In this case, explanation as to why more could not be obtained will be included. A self-certification of income does not qualify as supporting documentation. IHFA will use EIV as its highest verification source for Social Security income, and will not require additional supporting documents.

IHFA will verify the income information directly from its source under the following circumstances:

- A. If there is a significant discrepancy between EIV and the most current hand-carried document.
- B. If the employment is not showing in the EIV system.
- C. If the participant is unable to provide the most current pay stubs or other hand-carried documents.

D. If the income reported in EIV is disputed by the participant.

E. If documents are not original, altered, mutilated, not legible, or appear to be forged.

Other sources of income will be verified using participant supplied documentation, written third party form or oral verification, or certification, in that order. Discrepancies, omissions in, or questions about third-party verifications will result in IHFA making telephone contact with the individual who filled out the verification for clarification.

IHFA will not require tax returns except for the following: self-employment income, sporadic income, or inconsistencies in employment information. Sporadic income is income that is neither reliable nor periodic.

Self-employment: Self-employed individuals will be required to prepare monthly profit and loss statements and submit them at the time of their annual reexamination. Tenant rent increases will not be made between annual reexaminations except as provided in the interim policy unless the participant requests a special adjustment prior to the annual reexamination or in the case of a decrease in income, as required. The participant will be required to submit the most recently filed tax return, and any schedules deemed necessary by the branch office, with their annual reexamination paperwork. IHFA may request to view the supporting documentation of any profit and loss statement if deemed necessary or to review questionable expenses.

Assets: Applicants or participants may provide documents generated by the source (bank statements, etc.) as verification of bank accounts. In the event additional information is required in order to calculate cash value or income from interest, etc., and the participant is unable to supply it, IHFA will contact the source for clarification. The applicant or participant may provide self-certification for combined assets not exceeding \$5,000. When combined assets equal \$5,000 or less and imputed income is not a factor in the income calculation, IHFA will not require additional information to calculate cash value.

Zero Income: Those families at zero income are to complete a Statement of Survival for each month and submit them along with a Zero Income Statement every ninety (90) days. These statements will be carefully reviewed by the housing specialist. Questionable ratios of expenses to income should be discussed with the participant and investigated.

Income of minors: Income of children under the age of 18 years will be verified by self-certification for the purpose of inclusion in the 50058 per reporting requirements.

10.2 TYPES OF VERIFICATION

The chart on the following pages outlines the factors that may be verified and gives common examples of the verification that will be sought. When IHFA's next step in the verification process is to obtain a written third party verification form, IHFA will send a request form to the source along with a release form signed by the applicant/participant via first class mail, or fax. Discrepancies or omissions in the information provided in third-party verifications will be clarified by telephone.

Upfront (UIV) using HUD's EIV system.	Highest (Mandatory, highest level of third-party verification.)
UIV – Non HUD System	High-optional
Written 3rd Party Verification	High (Mandatory to support EIV and when EIV has no data.)
Written 3rd Party Verification Form	Medium-Low (Traditional 3 rd party verification)
Oral 3rd Party Verification	Low
Tenant Declaration	Very Low (Use as a last resort.)**NOTE: IHFA must document in the tenant file, the reason third-party verification was not available. **

ELIGIBILITY

Eligibility Type	<u>Upfront</u> LEVEL 6	<u>Written Third-party</u> LEVEL 4	<u>Written Third-party form</u> LEVEL 3	<u>Oral Third Party</u> LEVEL 2	<u>Tenant Declaration</u> LEVEL 1
Student Status	Not Available	IHFA may accept original documents such as class schedules and financial aid award letters from the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to the independent sources to obtain student verification and financial aid information.	In the event that no response is given to IHFA's written request for information, IHFA may request the information via phone or in person.	Not Available
Independent Student	Not Available	IHFA may accept original documents such as birth certificates, court documents showing the applicant was an orphan or a ward of the state, marriage certificates, veteran forms, or a lease in effect for 1 year that is separate from the parent or legal guardian.	IHFA mails, faxes, or emails a verification form directly to the sources to obtain verification.	Not Available	Not Available
Veteran Status	Not Available	IHFA may accept original	IHFA mails, faxes, or emails	In the event the VA does not	Not Available

Eligibility Type	<u>Upfront</u> LEVEL 6	<u>Written Third-party</u> LEVEL 4	<u>Written Third-party form</u> LEVEL 3	<u>Oral Third Party</u> LEVEL 2	<u>Tenant Declaration</u> LEVEL 1
		documents such as a letter from the Veterans Administration (VA), or a DD2-14.	a verification form directly to the VA.	respond to IHFA's written request, IHFA may request the information via phone or in person.	
Terminal Illness Preference	Not Available	IHFA may accept a letter from a medical professional stating the applicant has a terminal illness and is in the final stages.	IHFA mails, faxes, or emails a verification form directly to the medical professional to obtain terminal illness information.	In the event the medical professional does not respond to IHFA's written request, IHFA may request the information via phone or in person.	Not Available
Disability Status	Use of HUD's EIV system when available.	IHFA may accept a letter from the Social Security Administration stating the reason for benefits, an award letter for SSI or SSDI, or a letter from a professional stating the disability status.	IHFA mails, faxes, or emails a verification form directly to the medical professional to obtain the requested information.	In the event the medical professional does not respond to IHFA's written request, IHFA may request the information via phone of in person.	Not Available
Need for a Live-in Aide	Not Available	IHFA may accept a letter from a medical professional stating the individual is disabled and requires live in care.	IHFA mails, faxes, or emails a verification form directly to the doctor or other professional to obtain the requested information.	In the event the doctor or other professional does not respond to IHFA's written request for information, IHFA may request the information via phone or in person.	Not Available

INCOME

Income Type	<u>Upfront</u> LEVEL 6	<u>Written Third-party</u> LEVEL 4	<u>Written Third-party form</u> LEVEL 3	<u>Oral Third-party</u> LEVEL 2	<u>Tenant Declaration</u> LEVEL 1
Wages or Salary	Use of HUD's EIV system plus hand-carried documents when available. Use of computer matching to obtain wage information electronically, or by mail or fax or in person.	IHFA may accept original documents such as consecutive pay stubs from the most recent 2-months period, W-2 forms, etc. from the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to the independent sources to obtain wage information.	In the event the independent source does not respond to IHFA's written request for information, IHFA may request the information via phone or in person.	IHFA may accept a statement from the applicant or participant that declares the family's total annual income from earnings.
Verification of Employment Income: When sending third-party written form verification, IHFA will always obtain as much information as possible about the employment such as start date (new employment), termination date (previous employment), pay frequency, pay rate, anticipated pay increases in the next twelve months, year-to-date earnings, bonuses, and overtime.					
Self-Employment	Not Available	IHFA may accept any documents (i.e. tax returns, invoices and letters from customers) provided by the applicant or participant.	IHFA mails or faxes a verification form directly to sources identified by the family to obtain income information.	IHFA may call the source to obtain income information.	IHFA may accept a statement from the applicant or participant that declares the family's total annual income.
Social Security Benefits	Use of HUD's EIV system when available.	IHFA may accept an original SSA Notice from the applicant or participant (e.g. Benefit Award Letter).	Not Available	Not Available	IHFA may accept a statement from the applicant or participant declaring monthly benefits.
Welfare Benefits	Use of the Department of Health & Welfare (H&W) IBES computer system to obtain current benefit information	IHFA may review an original award notice or printout from H&W provided by the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to H&W to obtain welfare benefit information.	IHFA may call H&W to obtain current benefit amount.	IHFA may accept a statement from the applicant or participant that declares monthly welfare benefit.
Child Support and Alimony	Use of CSE web system	IHFA may accept an original court order, notice or printout from the	IHFA mails, faxes, or emails a verification form directly to	IHFA may call the local Child Support Enforcement	IHFA may accept a statement from the applicant or

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		local Child Support Enforcement (CSE) agency, or a letter from the child support payer provided by the applicant or participant.	the local CSE agency, or the child support payer to obtain current child support amounts and payment status.	agency or child support payer to obtain current child support amount and payment status.	participant that declares current child support amount and payment status.
Unemployment Benefits	Use of HUD EIV system plus hand-carried documents when available.	IHFA may accept an original benefit notice, un-employment check stubs, or printout from the local State Wage Information Collection Agency(SWICA) provided by the applicant or participant.	Not Available	Not Available	IHFA may accept a statement from the applicant or participant that declares un-employment benefits.
Pensions	Not Available	IHFA may review an original benefit notice from the pension provider provided by the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to the pension provider to obtain pension information	IHFA may call the pension provider to obtain current benefit amount.	IHFA may accept a statement from the applicant or participant that declares monthly pension amounts.
Regular Gifts and Contributions	Not Available	IHFA may review Bank Statements showing deposits or other similar evidence provided by the applicant or participant, or a letter from the individual source which includes the name, address, and phone number of the source.	IHFA mails, faxes, or emails a verification form directly to the source to obtain regular gift or contribution amount.	IHFA may call the source of the regular gift or contribution to obtain current monthly amounts gift or contribution amount.	IHFA may accept a statement from the applicant or participant that declares regular gifts and contributions.

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Assets	Not Available	IHFA may review original document provided by the applicant or participant. IHFA may accept applicant or participant self certification for combined assets that do not exceed \$5,000.	IHFA mails, faxes, or emails a verification form directly to the source to obtain asset and asset income information.	IHFA may call the source to obtain asset and asset income information.	IHFA may accept a statement from the applicant or participant that declares assets and asset income.
Income from Parents for Student Status	Not Available	IHFA may review copies of the most recent IRS tax return provided by the applicant or participant for his/her parents. IHFA may accept a statement from the parent that declares his or her income.	Not Available	Not Available	Not Available

NOTE: IHFA will use Tenant Declaration as a last resort, when all other verification methods are not possible or have been unsuccessful, except when combined assets total \$5,000 or less, or in the case of income from a minor.

NOTE: IHFA will not pass verification cost along to the applicant or participant.

EXPENSES

Expense Type	<u>Upfront</u> LEVEL 6	<u>Written Third-party</u> LEVEL 4	<u>Written Third-party form</u> LEVEL 3	<u>Oral Third-party</u> LEVEL 2	<u>Tenant Declaration</u> LEVEL 1
Disability Assistance Expense	Not Available	IHFA may accept original documents such as bills and records or payment from the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to the independent sources to obtain expense information.	In the event the independent source does not respond to IHFA's written third-party request, IHFA may contact the independent source by phone or in person.	Not Available

Expense Type	<u>Upfront</u> LEVEL 6	<u>Written Third-party</u> LEVEL 4	<u>Written Third-party form</u> LEVEL 3	<u>Oral Third-party</u> LEVEL 2	<u>Tenant Declaration</u> LEVEL 1
Medical Expenses	Not Available	IHFA may accept original documents such as bills and records of payment, dates of trips, mileage logs, and receipts for fares and tolls from the applicant or participant.	IHFA mails, faxes, or emails a verification form directly to the independent sources (pharmacies and medical professionals) to obtain expense information.	In the event the independent source does not respond to IHFA's written request for information, IHFA may contact the independent source by phone or in person.	Not Available
Child Care Expenses	Use of the State of Idaho IBES system to obtain ICCP information.	IHFA will accept original documents such as bills, records of payment, and statements from the provider generated on letterhead and which include the name, address, and phone number of the provider.	IHFA mails, faxes, or emails a verification form directly to the independent source to obtain expense information.	In the event the independent source does not respond to IHFA's written request for information, IHFA may contact the independent source by phone or in person.	Not Available
NOTE: When not specifically mentioned, IHFA will reference IRS Publication 502 for medical expenses.					

10.3 TIMING OF VERIFICATION

Verifications must be received within sixty (60) days of voucher issuance at admission to the program and ninety (90) days of annual reexamination or move recertification. All verifications will be date stamped as they are received by IHFA. (Example: A voucher is issued on 5/1/10. Verifications can be no older than 3/2/10. The annual reexamination effective date is 5/1/10. Verifications can be no older than 2/1/10.)

Applicant/participant supplied (hand-carried) documents must be dated within sixty (60) days of request from IHFA or reexamination date. (Example: IHFA requests the applicant/participant provide a letter from the SSA to verify monthly SS benefit amounts on 4/1/10. The SSA award letter submitted to IHFA can be dated by the SSA no earlier than 1/31/10). If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim reexamination is conducted, IHFA will verify and update only those elements

reported to have changed, and discrepancy information contained in EIV until otherwise directed. (See interim policy section 12.5)

10.4 VERIFICATION OF CITIZENSHIP AND ELIGIBLE NONCITIZEN STATUS

The citizenship/eligible non-citizen status of each family member regardless of age must be determined.

Prior to being admitted, all citizens and nationals will be required to sign a declaration of citizenship under penalty of perjury.

Prior to being admitted all eligible non-citizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

Prior to being admitted all eligible non-citizens must sign a declaration of their status and verification consent form and provide their original INS documentation. IHFA staff is required to view the original INS documentation and will make a copy and place the copy in the file. IHFA also will verify their status through the INS SAVE system. INS documentation will be faxed to the Rental Assistance Clerk who will verify the information through the INS SAVE system. If the INS SAVE system cannot confirm eligibility, IHFA will mail information to the INS so a manual check can be made of INS records.

If a family member is added to a participating household, that family member will be required to sign a declaration of citizenship under penalty of perjury and the process, as outlined, at the next interim or annual reexamination.

Family members who do not claim to be citizens, nationals or eligible non-citizens, or whose status cannot be confirmed, must be listed on a statement of non-eligible members and the list must be signed by the head of the household.

Non-citizen student visas, though in the country legally, are not eligible to be admitted to the Section 8 Program.

Any family member who does not choose to declare their status must be listed on the statement of non-eligible members.

If no family member is determined to be eligible under this Section, the family's admission will be denied.

The family's assistance will not be denied, delayed, reduced or terminated because of a delay in the process of determining eligible status under this Section, except to the extent that the delay is caused by the family.

If IHFA determines that a family member has knowingly permitted an ineligible non-citizen (other than any ineligible non-citizens listed on the lease) to permanently reside in their Section 8

unit, the family's assistance will be terminated. Such family will not be eligible to be readmitted to Section 8 for a period of 24 months from the date of termination.

For each family member, citizenship/eligible non-citizen status will be verified only once. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular reexamination. Prior to a new member joining the family, their status will be verified.

10.5 VERIFICATION OF SOCIAL SECURITY NUMBERS

Prior to admission, each family member who has a Social Security Number (SSN) must disclose and provide documentation of his or her SSN. The best verification of the SSN is the original Social Security card. If the card is not available, IHFA will accept letters from Social Security that establish and state the individual's name and number (e.g., Social Security award letters). Documentation from other governmental agencies will also be accepted that establish and state the individual's name and number. Unacceptable documentation includes documents such as business cards, facsimiles of SSN cards, plastic or metal SSN cards, club membership cards or library cards.

New family members at least six years of age or less who have an assigned SSN must disclose and provide documentation of the SSN prior to being added to the lease. New family members under the age of six who do not have a SSN assigned to them will be required to disclose and provide documentation within 90 calendar days of being added to the household. If the family is unable to provide evidence of the SSN within 90 calendar days, IHFA will grant an additional 90-day period to comply with this requirement, if IHFA determines the family was unable to comply with the requirement due to circumstances that could not have reasonably been foreseen and were outside the control of the family. Examples include but are not limited to; delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, etc.

If a member of an applicant family indicates they have a Social Security Number, but cannot readily verify it, the family cannot be assisted until verification is provided.

If a member of a participant family indicates they have a Social Security Number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to 60-days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will have their assistance terminated.

A family admitted to the program prior to January 31, 2010, with a family member who did not have a Social Security Number at admission, will be required to disclose their SSN at the next regular reexamination or interim.

NOTES