

Chapter 7

VERIFICATION PROCEDURES

[24 CFR Part 5, Subparts B, D, E and F; 982.108]

INTRODUCTION

HUD regulations require that the factors of eligibility and Total Tenant Payment/Family Share be verified by the HOC. HOC must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. HOC staff will obtain written verification from independent sources whenever possible, or will document in tenant files why third party verification was impossible to obtain. HOC must not pass on the cost of verification to the family.

HOC's verification requirements are designed to maintain program integrity. This Chapter explains the HOC's procedures and standards for verification of preferences, income, assets, allowable deductions, family status, and changes in family composition.

A. METHODS OF VERIFICATION AND TIME ALLOWED [24 C FR 982.516]

HOC will verify information through the six methods of verification acceptable to HUD in the following order:

1. Upfront Income Verification (UIV) through HUD's Enterprise Income Verification system, see HOC's EIV policy; (this method is not available for income verification of applicants)
2. Upfront Income Verification (UIV) using a non - HUD system
3. Third-Party Written Verification (tenant provided or EIV self-certification)
4. Third-Party Written Verification
5. Oral Third Party Verification
6. Self - Certification

HOC will verify information through a secondary review through third party credit reports.

HOC will allow 14 days for return of third-party verifications and 14 days to obtain other types of verifications before going to the next method. HOC will document the file as to why third party written verification was not used.

For applicants, verifications may not be more than 60 days old at the time of voucher issuance. For participants, they are valid for 60 days from date of receipt.

Upfront Income Verification (W-UIV)

Upfront Income Verification (UIV) (Level 1/2)

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.

The UIV data is used to validate client reported income and supplement client provided documents. When the client disputes the UIV data, HOC must request written third party verification.

Acceptable Verification

UIV plus current client provided documents, such as pay stubs or the payroll summary report; HOC is required to obtain a minimum of two current and consecutive pay stubs for determining annual income from wages or the following:

- UIV plus current client provided documents plus written third-party verification;
- Tenant-provided documents should be dated within the last 120 days of the reexamination, pay stubs should be current and consecutive; and
- HOC will use state or federal records of child support payments to document and calculate income.

Projecting Annual Income through UIV:

When UIV data is not substantially different than client-reported income:

- If UIV data is less than client reported income, use client provided documents to calculate anticipated annual income.

If UIV data is greater than client reported income, use UIV data to calculate anticipated annual income, unless client can provide HOC with acceptable documentation to verify a change in circumstances.

When UIV data is substantially different than client reported income:

- HOC must request written third-party verification from the discrepant income source.

Written Third Party Verification (tenant provided or EIV self-certification) (Level 3)

Third-party verification is used to verify information directly with the source. Third-party written verification forms will be sent and returned via first class mail. The family will be required to sign an authorization for the information source to release the specified information.

Verifications received electronically directly from the source are considered third party written verifications.

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 HOC 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 HUD's position that such tenant-provided documents are written third party verification since these documents originated from a third party source. HOC may, at its discretion, reject any tenant-provided documents and follow up directly with the source to obtain necessary verification of information.

Third-Party Oral Verification (Level 5)

Oral third-party verification will be used when written third party verification is delayed or not possible. When third-party oral verification is used, staff will be required to complete a Certification of Document Viewed or Person Contacted form, noting with whom they spoke, the date of the conversation, and the facts provided. If oral third party verification is not available, HOC will compare the information to any documents provided by the Family. If provided by telephone, HOC must originate the call.

Self-Certification/Self-Declaration (Level 6)

When verification cannot be made by third-party verification or review of documents, families will be required to complete a self-certification. This may be an affidavit or notarized statement of reported income and/or expenses to HOC. This verification method will be used as a last resort, when HOC has not been successful in obtaining information via all other verification techniques. HOC will document in the tenant file why third party verification was not available.

Review of Documents

In the event that third-party written or oral verification is unavailable, or the information has not been verified by the third party within two weeks, HOC will annotate the file accordingly and utilize documents provided by the family as the primary source if the documents provide complete information.

All such documents, excluding government checks, will be photocopied and retained in the applicant file. In cases where documents are viewed which cannot be photocopied, staff viewing the document(s) will complete a Certification of Document Viewed or Person Contacted form or document.

HOC will accept the following documents from the family provided that the document is such that tampering would be easily noted:

- Printed wage stubs
- Computer print-outs from the employer
- Signed letters (provided that the information is confirmed by phone)
- Other documents noted in this Chapter as acceptable verification The

HOC will accept photocopies after review of the original documents.

If third-party verification is received after documents have been accepted as provisional verification, and there is a discrepancy, the HOC will utilize the third party verification.

HOC will not delay the processing of an application beyond 14 days because a third party information provider does not return the verification in a timely manner.

Self-Certification/Self-Declaration

When verification cannot be made by third-party verification or review of documents, families will be required to complete a self-certification. This may be an affidavit or notarized statement of reported income and/or expenses to HOC. This verification method will be used as a last resort, when HOC has not been successful in obtaining information via all other verification techniques. HOC will document in the tenant file why third party verification was not available.

B. RELEASE OF INFORMATION [24 CFR 5.230]

HOC requires that each family member above the age of 18 sign a HUD9886 form to authorize the release of certain information to HOC on admission. At each annual or interim reexamination, HOC will determine if any family member turned 18 and has not yet signed the HUD-9886 form. Such a family member will be required to sign the appropriate form at the reexamination. The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to HOC to revoke consent. Families have the right to revoke consent by notice to HOC, however, revoking consent will result in termination or denial of assistance.

In addition, family members will be required to sign specific authorization forms when information is needed that is not covered by the HUD form 9886, Authorization for Release of Information/Privacy Act Notice.

Each member requested to consent to the release of specific information will be provided with a copy of the appropriate forms for their review and signature.

Family refusal to cooperate with the HUD prescribed verification system will result in denial of admission or termination of assistance because it is a family obligation to supply any information and to sign consent forms requested by HOC or HUD.

C. COMPUTER MATCHING

Where allowed by HUD and/or other State or local agencies, computer matching will be done.

HOC will utilize the HUD established Enterprise Income Verification (EIV)/Upfront Income Verification (UIV) tool for obtaining Social Security benefits, Supplemental Security Income, benefit history and tenant income discrepancy reports from the Social Security Administration (Refer to EIV policy).

D. INITIAL LEASE UP [24 CFR 5.233]

For each New Admission (form HUD-50058 action type 1) Income Report:

- HOC must review the Income Report to confirm/validate family-reported income within 90 days of the admission date.
- Any income discrepancies must be resolved with the family within 30 days of the Income Report date

For each Historical Adjustment (form HUD-50058 action type 14) Income Report:

- HOC must review the Income Report to confirm/validate family-reported income within 90 days of the PIC submission date
- Any income discrepancies must be resolved with the family within 30 days of the Income Report date.

When computer matching results in a discrepancy with information in HOC's records, HOC will follow up with the family and verification sources to resolve this discrepancy. If the family has unreported or underreported income, HOC will follow the procedures in the Program Integrity Addendum of the Administrative Plan.

E. ITEMS TO BE VERIFIED [24 CFR 982.516]

All income not specifically excluded by the regulations.

Full-time student status including High School students who are 18 or over.

Total value of Current assets including assets disposed of for less than fair market value in preceding two years.

Child-care expense where it allows an adult family member to be employed or to further his/her education.

Total medical expenses of all family members in households whose head or spouse is elderly or disabled.

Disability assistance expenses to include only those costs associated with attendant care or auxiliary apparatus for a disabled member of the family, which allow an adult family member to be employed.

Disability for determination of preferences, allowances or deductions.

U.S. citizenship/eligible immigrant status.

"Preference" status.

Familial/Marital status when needed for head or spouse definition.

Verification of Reduction in Benefits for Noncompliance:

- HOC will obtain written verification from the welfare agency stating that the family's benefits have been reduced for fraud or noncompliance before denying the family's request for rent reduction.

F. VERIFICATION OF INCOME [24 CFR 982.516]

This section defines the methods the HOC will use to verify various types of income.

Employment Income

Verification forms request the employer to specify the:

- Dates of employment;
- Amount and frequency of pay;
- Date of the last pay increase;
- Likelihood of change of employment status and effective date of any known salary increase during the next 12 months;
- Year to date earnings; and
- Estimated income from overtime, tips, bonus pay expected during next 12 months.

Acceptable methods of verification include, in this order:

1. Employment verification form completed by the employer.
2. Four current consecutive pay stubs or earning statements, which indicate the employee's gross pay, frequency of pay or year to date earnings.
3. W-2 forms plus income tax return forms.

Self-certification or income tax returns signed by the family may be used for verifying self-employment income, or income from tips and other gratuities.

Applicants and program participants may be requested to sign an authorization for release of information from the Internal Revenue Service for further verification of income.

In cases where there are questions about the validity of information provided by the family, the HOC will require the most recent federal income tax statements.

Where doubt regarding income exists, a referral to IRS for confirmation will be made on a case- by-case basis.

Social Security, Pensions, Supplementary Security Income (SSI), Disability Income

Acceptable methods of verification include, in this order:

1. Utilize the HUD established Enterprise Income Verification (EIV)/Upfront Income Verification (UIV) tool for benefits, benefit history and tenant income discrepancy reports from the Social Security Administration (Refer to EIV policy);
2. Benefit verification form completed by the agency providing the benefits;
3. Award or benefit notification letters prepared and signed by the providing agency; or
4. Computer report electronically obtained or in hard copy.

Unemployment Compensation

Acceptable methods of verification include, in this order:

1. Utilize the HUD established Enterprise Income Verification (EIV)/Upfront Income Verification (UIV) tool for benefits and benefit history reports from the Unemployment Compensation agency;
2. Verification form completed by the unemployment compensation agency;
3. Computer report electronically obtained or in hard copy, from the unemployment office stating payment dates and amounts; or
4. Payment stubs.

Welfare Payments or General Assistance

Acceptable methods of verification include, in this order:

1. HOC verification form completed by payment provider;
2. Written statement from payment provider indicating the amount of grant/payment, start date of payments, and anticipated changes in payment in the next 12 months;
3. Computer-generated Notice of Action; or
4. Computer-generated list of recipients from Welfare Department.

Alimony or Child Support Payments

Acceptable methods of verification include, in this order:

1. Copy of a separation or settlement agreement or a divorce decree stating amounts and types of support and payment schedules;
2. State or federal records of child support payments;
3. A notarized statement or affidavit signed by the person providing the support. This document must include amount of support, pay or name, address, and phone number;
4. Copy of 3 latest check and/or payment stubs from Child Support Enforcement. For verbal third party HOC must record the date, amount, and number of the check; or
5. Family's self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received.

If payments are irregular, the family must provide:

- A copy of the separation or settlement agreement, or a divorce decree stating the amount and type of support and payment schedules;
- A statement from the agency responsible for enforcing payments to show that the family has filed for enforcement;
- A notarized affidavit from the family indicating the amount(s) received.
- A welfare notice of action showing amounts received by the welfare agency for child support or
- A written statement from an attorney certifying that a collection or enforcement action has been filed.

Net Income from a Business

In order to verify the net income from a business, HOC will view IRS and financial documents from prior years and use this information to anticipate the income for the next 12 months.

Acceptable methods of verification include:

- IRS Form 1040, including:
 - Schedule C (Small Business)
 - Schedule E (Rental Property Income)
 - Schedule F (Farm Income)
- 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;
- Audited or un-audited financial statement(s) of the business;
- Credit report or loan application;

- Documents such as manifests, appointment books, cashbooks, bank statements, and receipts will be used as a guide for the prior 180 days (or lesser period if not in business for 90 days) to project income for the next 12 months. The family will be advised to maintain these documents in the future if they are not available; or
- Family's self-certification as to net income realized from the business during previous years.

Child Care Business

If an applicant/participant is operating a licensed day care business, income will be verified as with any other business.

If the applicant/participant is operating a "cash and carry" operation (which may or may not be licensed), HOC will require that the applicant/participant complete a form for each customer which indicates: name of person(s) whose child (children) is/are being cared for, phone number, number of hours a child is being cared for, method of payment (check/cash), amount paid, and signature of person.

If the family has filed a tax return, the family will be required to provide it.

HOC will conduct interim reevaluations every year and require the participant to provide a log with the information about customers and income.

If childcare services were terminated, third-party verification will be sent to the parent whose child was cared for.

Recurring Gifts

Acceptable methods of verification include, in this order:

1. A notarized statement or affidavit signed by the person providing the assistance giving the purpose, date and value of gifts. This document should include the pay or name, address and phone number; or
2. A self-certification provided by the family that contains the following information: The person who provides the gift, the value of the gifts, the dates of the gifts and the purpose of the gifts.

Full-time Student Status

Only the first \$480 of the earned income of full time students, other than head, co-head, or spouse, will be counted towards family income.

Financial aid, scholarships and grants received by full time students is not counted towards family income.

Verification of full time student status includes:

- Written verification from the registrar's office or other school official; or school records which show a sufficient number of credits to be considered a full-time student by the educational institution attended.
- School records, such as an official report card, indicating enrollment for sufficient number of credits to be considered a full-time student by the educational institution.

G. INCOME FROM ASSETS [24 CFR 982.516]

VERIFICATION OF ASSETS

Asset Accounts with Interest Income and Dividends with current balance exceeding \$51,000.

Acceptable methods of verification include, in this order:

- Verification forms from a financial institution or broker.
- Passbook, account statements, certificate of deposit, bonds, or financial statements completed by a financial institution or broker including current interest rates and dividends.
- Broker's statements showing value of stocks or bonds and the earnings credited the family.
Earnings can be obtained by oral broker's verification or current newspaper quotations.
- IRS Form 1099 from the financial institution provided that the PHA must adjust the information to project earnings expected for the next 12 months.

Interest Income from Mortgages or Similar Arrangements

Acceptable methods of verification include, in this order:

- Amortization schedule showing interest for the 12 months following the effective date of the certification or recertification.
- A letter from an accountant, attorney, real estate broker, the buyer, or financial institution stating interest due for the next 12 months. (A copy of the check paid by the buyer to the family is not sufficient unless of a breakdown of interest is present.
- A copy of latest rent receipts, leases, or other documentation of rent amounts.
- Documentation of allowable operating expenses of the property: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.
- Lessee's written statement verifying rent payments to the family and family's self-certification as to the net income realized.

- Verification for assets to determine the current cash value the net amount the family would receive if the assets were converted to cash). Quotes from a stock broker or realty agent as to the net amount family would receive if they liquidated securities or real estate.
- Real estate tax statements if the approximate current cash value can be deduced from the assessment.
- Financial statements from business assets.
- Copies of closing documents showing the selling price and the distribution of the sales proceeds.
- Appraisals of personal property held as an investment.
- Family's self-certification describing assets or cash held at the family's home or in a safe deposit boxes.

Assets Disposed of for Less than Fair Market Value (FMV) During the Two Years Preceding the Effective Date of Certification or Recertification.

For all certification and recertification, the PHA will obtain the Family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or recertification.

If the family certifies that they have disposed of assets for less than fair market value, verification if required that shows: (a) all assets disposed of for less than FMV, (b) the date they were disposed of, (c) the amount the family received, and (d) the market value of the assets at the time of disposition. Third party verification will be obtained whenever possible.

For a family with net family assets equal to or less than \$50,000, which this amount will be adjusted annually by HUD in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, HOC may accept a self-certification of the cash value of assets after the asset has initially been verified by obtaining a third-party verification every 3 years.

Asset Limit - non enforcement at Annual recertification

H. VERIFICATION OF ALLOWABLE DEDUCTIONS FROM INCOME [24 CFR 982.516]

Child Care Expenses

Written verification from the person who receives the payments is required. If the child care provider is an individual, s/he must provide a statement of the amount they are charging the family for their services. Additionally, the family must provide two months of cancelled checks or cancelled cashier money orders verifying the child care costs.

Verifications must specify the child care provider's name, address, telephone number, Social Security Number, the names of the children cared for, the number of hours the child care occurs, the rate of pay, and the typical yearly amount paid, including school and vacation periods.

Family's certification as to whether any of those payments have been or will be paid or reimbursed by outside sources.

Medical Expenses

Families, who claim medical expenses will be required to submit a certification as to whether or not any expense payments have been, or will be, reimbursed by an outside source. All expense claims will be verified by one or more of the methods listed below:

- Written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, of (a) the anticipated medical costs to be incurred by the family and regular payments due on medical bills; and (b) extent to which those expenses will be reimbursed by insurance or a government agency.
- Written confirmation by the insurance company or employer of health insurance premiums to be paid by the family.

Written confirmation from the Social Security Administration of Medicare premiums to be paid by the family over the next 12 months. A computer printout will be accepted.

For attendant care:

- A reliable, knowledgeable professional's certification that the assistance of an attendant is necessary as a medical expense and a projection of the number of hours the care is needed for calculation purposes.
- Attendant's written confirmation of hours of care provided and amount and frequency of payments received from the family or agency (or copies of canceled checks the family used to make those payments) or stubs from the agency providing the services.

Receipts, canceled checks, or pay stubs that verify medical costs and insurance expenses likely to be incurred in the next 12 months.

Copies of payment agreements or most recent invoice that verify payments made on outstanding medical bills that will continue over all or part of the next 12 months.

Receipts or other record of medical expenses incurred during the past 12 months that can be used to anticipate future medical expenses, which includes regular visits to doctors or dentists, for "general medical expenses". For non-prescription drugs verification is needed from a medical professional stating that these drugs are prescribed is also needed along with receipts. One time, nonrecurring expenses from the previous year will not be included.

The PHA will use mileage at the IRS rate, or cab, bus fare, or other public transportation cost for verification of the cost of transportation directly related to medical treatment.

Assistance to Persons with Disabilities [24 CFR 5.611(c)]

In All Cases:

Written certification from a reliable, knowledgeable professional that the person with disabilities requires the services of an attendant and/or the use of auxiliary apparatus to permit him/her to be employed or to function sufficiently independently to enable another family member to be employed.

Family's certification as to whether they receive reimbursement for any of the expenses of disability assistance and the amount of any reimbursement received.

Attendant Care:

- Attendant's written certification of amount received from the family, frequency of receipt, and hours of care provided.
- Certification of family and attendant and/or copies of canceled checks family used to make payments.

Auxiliary Apparatus:

- Receipts for purchases or proof of monthly payments and maintenance expenses for auxiliary apparatus.
- In the case where the person with disabilities is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

HOC will accept written third-party documents provided by the family. If family- provided documents are not available, HOC will provide a third-party verification form directly to the care provider requesting the needed information.

Expenses for attendant care will be verified through:

- Written third-party documents provided by the family, such as receipts or canceled checks.
- Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred and the anticipated period.

Auxiliary apparatus expenses will be verified through:

- Written third-party documents provided by the family, such as 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 period for which the hardship is requested.

- Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party or document review is not possible, written family certification of estimated apparatus costs for the period for which the hardship is requested.

In addition, HOC will verify that:

- The family member for whom the expense is incurred is a person with disabilities;
- The expense permits a family member, or members, to work; and
- The expense is not reimbursed from another source.

Family member(s) permitted to work:

- HOC will verify that the expenses claimed enable a family member, or members, including the person with disabilities, to work.
- HOC will request 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 auxiliary apparatus enables another family member, or members, to work.
- This documentation may be provided by the family. If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense enables a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible, the costs must not be reimbursed by another source.

The family is required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

I. VERIFYING NON-FINANCIAL FACTORS [24 CFR 982.153(b)(15)]

Residency Requirements

Applicants claiming self-employment income must provide documentation that the business is registered in Montgomery County or that 51 percent of the business is conducted within Montgomery County.

Applicants and program participants may be requested to sign an authorization for release of information from the Internal Revenue Service for further verification of income.

Verification of Legal Identity

In order to prevent program abuse, HOC will require applicants to furnish verification of legal identity for all family members.

The documents listed below will be considered acceptable verification of legal identity for adults. If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

- Certificate of Birth, naturalization papers.
- Church issued baptismal certificate
- Current, valid Driver's license
- U.S. military discharge (DD 214)
U.S. passport
- Department of Motor Vehicles Identification Card
- Hospital records

Documents considered acceptable for the verification of legal identity for minors may be one or more of the following:

- Certificate of Birth
- Adoption papers
- Custody agreement
- Health and Human Services ID
- School records

Verification of Marital Status

Verification of divorce status will be a certified copy of the divorce decree, signed by a Court Officer. Verification of a separation may be a copy of court-ordered maintenance or other records. Verification of marriage status is a marriage certificate.

Familial Relationships (pages 7-16 and 7-17)

Certification will normally be considered sufficient verification of family relationships. In cases where reasonable doubt exists, the family may be asked to provide verification.

The following verifications will always be required if applicable:

Verification of relationship:

- Official identification showing names
- Birth Certificates
- Baptismal certificates

Verification of guardianship is:

- Court-ordered assignment
- Verification from social services agency

Verification of Permanent Absence of Family Member

If an adult member who was formerly a member of the household is reported permanently absent by the family, HOC will consider any of the following as verification:

- Husband or wife institutes divorce action;
- Husband or wife institutes legal separation;
- Order of protection/restraining order obtained by one family member against another.
- Proof of another home address, such as utility bills, canceled checks for rent, driver's license, or lease or rental agreement, if available;
- Statements from other agencies such as social services or a written statement from the landlord or manager that the adult family member is no longer living at that location; or
- If the adult family member is incarcerated, a document from the Court or correctional facility should be obtained stating how long they will be incarcerated.

Verification of Change in Family Composition

HOC may verify changes in family composition (either reported or unreported) through letters, telephone calls, utility records, inspections, landlords, credit data, school, employment, or DMV records, and other sources. In cases of domestic violence, stalking, or dating violence, HOC will accept a final order of protection, peace order, or similar court order to remove a household member.

If the family is unable to obtain the above documentation, HOC will accept documentation from the U.S. Postal Service that indicates that the removed household member does not receive mail at the program unit address and a notarized statement from the head of household, the former member or both.

Verification of Disability

Verification of disability must be receipt of SSI or SSA disability payments under Section 223 of the Social Security Act or 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(7)) or for those who do not receive disability benefits the disability can be verified by appropriate diagnostician such as physician, psychiatrist, psychologist, therapist, rehab specialist, or licensed social worker, using the HUD language as the verification format.

Verification of Citizenship/Eligible Immigrant Status [24 CFR 5.508, 5.510, 5.512, 5.514]

To be eligible for assistance, individuals must be U.S. citizens or eligible immigrants. Individuals who are neither may elect not to contest their status. Eligible immigrants must fall into one of the

categories specified by the regulations and must have their status verified by Immigration and Naturalization Service (INS). Family members must declare their status once. Assistance cannot be delayed, denied, or terminated while verification of status is pending except that assistance to applicants may be delayed while HOC hearing is pending.

Citizens or Nationals of the United States are required to sign a declaration under penalty of perjury.

HOC will require citizens to provide documentation of citizenship. Acceptable documentation will include at least one of the following original documents:

- United States birth certificate
- United States Passport
- Resident alien/registration card
- Other appropriate documentation as determined by HOC

Eligible Immigrants who were Participants and 62 or over on June 19, 1995, are required to sign a declaration of eligible immigration status and provide proof of age.

Non-citizens with eligible immigration status must sign a declaration of status and verification consent form and provide their original immigration documents which are copied front and back and returned to the family. HOV verifies the status through the INS SAVE system. If this primary verification fails to verify status, HOC must request within 10 days that the INS conduct a manual search.

Ineligible family members who do not claim to be citizens or eligible immigrants must be listed on a statement of ineligible family members signed by the head of household or spouse.

Non-citizen students on student visas are ineligible members even though they are in the country lawfully. They must provide their student visa but their status will not be verified and they do not sign a declaration but are listed on the statement of ineligible members.

Failure to Provide: If an applicant or participant family member fails to sign required declarations and consent forms or provide documents as required, they must be listed as an ineligible member. If the entire family fails to provide and sign as required, the family may be denied or terminated for failure to provide required information.

Time of Verification

For applicants, verification of U.S. citizenship/eligible immigrant status occurs at the same time as verification of other factors of eligibility for final eligibility determination.

HOC will not provide assistance to any family prior to the affirmative establishment and verification of the eligibility of the individual or at least one member of the family.

HOC will verify the U.S. citizenship/eligible immigration status of all participants no later than the date of the family's first annual reexamination following the enactment of the Quality Housing and Work Responsibility Act of 1998.

For family members added after other members have been verified, the verification occurs at the first recertification after the new member moves in.

Once verification has been completed for any covered program, it need not be repeated except that, in the case of port-in families, if the initial PHA does not supply the documents, HOC must conduct the determination.

Extensions of Time to Provide Documents

HOC will grant an extension of 30 days for families to submit evidence of eligible immigrant status.

Acceptable Documents of Eligible Immigration

The regulations stipulate that only the following documents are acceptable unless changes are published in the Federal Register:

- Resident Alien Card (I-551)
- Alien Registration Receipt Card (I-151)
- Arrival-Departure Record (I-94)
- Temporary Resident Card (I-688)
- Employment Authorization Card (I-688B)

Receipt issued by the INS for issuance of replacement of any of the above documents that shows individual's entitlement has been verified

A birth certificate is not acceptable verification of status. All documents in connection with U.S. citizenship/eligible immigrant status must be kept 5 years.

HOC will verify the eligibility of a family member at any time such eligibility is in question, without regard to the position of the family on the waiting list. If HOC determines that a family member has knowingly permitted another individual who is not eligible for assistance to reside permanently in the family's unit, the family's assistance will be terminated for 36 months, unless the ineligible individual has already been considered in prorating the family's assistance.

Verification of Social Security Numbers [24 CFR 5.216]

Social security numbers must be provided as a condition of eligibility for all family members if they have been issued a number, except any member who is older than 62 as of Jan 31, 2010 and receiving assistance as of that date.

At the time any change in family composition is reported to HOC, each new family member will be required to produce a Social Security card or original document issued by a federal or state government agency that provides the Social Security Number of the individual along with other identifying information. HOC will accept HUD prescribed documentation of this information.

If an applicant or participant is able to disclose the Social Security Number but cannot meet the documentation requirements, the applicant or participant cannot become a participant or continue as a participant until the applicant or participant can provide the complete and accurate Social Security Number assigned to each member of the household. **HOC will accept self-certification and at least one third-party document with the applicant's name on it for admissions, only if HOC has exhausted all other options and documents why it was unable to obtain SSN documentation. If the SSN for the applicant is verified in EIV, no further documentation is required. If the SSN is not verified in EIV, HOC must obtain a valid SSN card or an original document issued by a federal or state government that includes the individual's name and SSN. Assistance will be terminated if applicant fails to meet the SSN verification requirements.**

HOC permits a 90-day period during which an applicant family may become a program participant, even if the family lacks the documentation necessary to verify the Social Security Number (SSN) of a family member under the age of six (6) years old. An extension of one additional 90-day period must be granted if HOC determines that, in its discretion, the applicant's failure to comply was due to circumstances that could not reasonably have been foreseen and were outside of the control of the applicant. For example, an applicant may be able to demonstrate timely submission of a request for a Social Security Number, in which case processing time would be the cause of the delay. If the applicant family does not produce the required documentation within the authorized time period, HOC must impose appropriate penalties, in accordance with the Code of Federal Regulations at 24 CFR 5.218.

If merited, HOC will offer a grace period and/or an extension. HOC will implement this provision just as it currently implements the provision for program participants. Specifically, an applicant family with a child under the age of six (6) years may become a participant family, even if the Social Security Number for the child has not been verified at the time of admission. If the Social Security Number has still not been verified at the end of the initial 90-day period, then HOC must determine whether a 90-day extension is merited. If it is not merited, then HOC must follow the provisions of 24 CFR 5.218. If a 90-day extension is merited, then HOC must either verify the Social Security Number for the child by the end of the 90-day extension period or follow the provisions of 24 CFR 5.218.

Failure to provide the required documentation during the recertification process will result in an incomplete recertification action and may subject the family to termination of housing assistance.

Medical Need for Larger Unit

A written certification that a larger unit is necessary must be obtained from a reliable, knowledgeable professional, such as a doctor, social worker, or caseworker.