Housing Consultants of America

# EIV Compliance: What Property Managers Need to Know About Enterprise Income Verification

**An easy-to-understand guide to EIV reports, documentation, discrepancies, tenant communication, security, and common compliance mistakes**

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Enterprise Income Verification, commonly called EIV, is one of the most important compliance tools used in HUD-assisted housing. For Multifamily Housing owners and management agents, EIV is used to help verify employment and income information, identify potential duplicate assistance, address identity-verification issues, detect new employment, and reduce subsidy-payment and administrative errors.

EIV is not simply a report that gets printed and placed in the tenant file. Property managers need a consistent process for running the appropriate reports, reviewing the information, communicating with residents, resolving discrepancies, documenting the outcome, protecting sensitive information, and retaining the required records.

**When those steps are inconsistent, EIV becomes a frequent source of findings during file audits and Management and Occupancy Reviews (MORs).**

## What Is EIV?

EIV is HUD's electronic income-verification system. It provides employment, wage, unemployment-compensation, Social Security, Supplemental Security Income, and other verification information through federal data matching. For HUD Multifamily Housing, owners and management agents are required to use EIV in accordance with applicable HUD requirements.

The system should be viewed as both an income-verification tool and a compliance-control system. It can help confirm information reported by a household, but it can also reveal information that requires additional research or follow-up.

## The EIV Reports Property Managers Should Understand

| EIV Report | Why It Matters |
|---|---|
| Income Report | Provides employment and income information used during applicable recertifications and other required reviews. Staff must compare the information with tenant-reported information and follow HUD verification requirements. |
| Income Discrepancy Report | Helps identify differences between certain EIV income information and income reported for the household. A discrepancy is a signal to review the file - not automatic proof that a resident committed fraud. |
| New Hires Report | Identifies household members with new employment information. HUD guidance requires owners/agents to review applicable new-hire information and follow up when employment has not been reported or processed as required. |
| Existing Tenant Search | Used when processing an applicant to identify whether the applicant or household member may already be receiving HUD rental assistance at another Multifamily or PIH location. |
| Multiple Subsidy Report | Identifies possible situations in which a person may be receiving assistance at more than one HUD-assisted location. Results require research and resolution. |
| Identity Verification Report | Helps identify household members whose identity information has failed or is pending SSA/EIV verification and requires appropriate follow-up. |
| Deceased Tenant Report | Identifies individuals reported as deceased who appear in HUD systems. Property staff must investigate and resolve the information when applicable. |

## EIV Is Not a Substitute for File Review

One of the most common mistakes is assuming that information appearing in EIV automatically becomes the household's income calculation. Property staff still need to understand what the report is showing, compare it with tenant-reported information, determine whether additional documentation is required, and calculate anticipated income under the applicable HUD requirements.

EIV information can be historical or can identify information that needs clarification. The file should document how staff evaluated the information and how the final certification decision was reached.

## How to Handle an EIV Discrepancy

An EIV discrepancy should trigger a documented review process. Staff should not accuse a resident of intentionally hiding income simply because two sources do not match. There may be timing differences, employment changes, reporting delays, incorrect employer data, or other explanations.

- **Review the EIV information carefully.** Identify the employer, benefit, period, household member, and amount creating the concern.
- **Compare it with the tenant file.** Review the certification, application, interim history, resident statements, and existing verification.
- **Discuss the issue with the tenant.** Explain what information requires clarification and give the resident an opportunity to provide current documentation.
- **Obtain additional verification when required.** HUD guidance directs owners/agents to obtain appropriate supporting or third-party verification when EIV information is disputed or insufficient.
- **Determine whether a certification needs correction.** If the review identifies income that should have been included or a change that requires action, process the appropriate certification under program requirements.

- **Document the resolution.** The file should show what was reviewed, what the resident explained, what verification was obtained, and what action the property took.

## Tenant Communication Matters

EIV conversations can be uncomfortable for residents. A tenant may believe the property is accusing them of wrongdoing when staff are simply attempting to reconcile information. Property managers should communicate factually and neutrally.

- Explain that EIV is a HUD verification system used as part of the property's compliance process.
- Identify the specific information that needs clarification without making assumptions about intent.
- Tell the resident exactly what documentation is needed and provide a reasonable process for submitting it.
- Document the conversation and all follow-up attempts.
- When a correction affects rent or assistance, provide required notices and explain the effective date and calculation.
- Protect the resident's privacy. Do not discuss EIV information with unauthorized individuals.

## EIV Documentation: If It Is Not in the File, It Is Difficult to Defend

A strong EIV file tells the complete story. The report itself is only one part of that story. Reviewers should be able to see that staff ran the appropriate report, evaluated it, resolved any concerns, obtained required documentation, and took the appropriate certification or follow-up action.

- **Applicable EIV report or evidence of required review.**
- **Tenant-provided documentation** used to clarify current circumstances.
- **Third-party verification** when required or necessary to resolve disputed information.
- **Written notes or clarification** explaining unusual circumstances or discrepancies.
- **Correspondence and tenant communication** related to unresolved income, new employment, identity, duplicate assistance, or other findings.
- **Resulting certification or corrective action** when the EIV review requires a change.
- **Evidence of resolution** so an auditor does not encounter an open issue with no documented conclusion.

## Protecting EIV Information

EIV contains sensitive personal and income information. Access must be limited to authorized individuals with a legitimate program-related need. Properties should maintain written EIV policies and procedures, follow HUD security and Rules of Behavior requirements, control printed reports, and ensure sensitive EIV information is not left unsecured or shared improperly.

HUD also requires ongoing administration of EIV access. Multifamily EIV coordinators are subject to annual recertification, while users must be recertified through the applicable EIV user-certification process on HUD's schedule. Properties should not wait until an employee loses access to discover that user administration was not maintained.

## Common EIV Compliance Mistakes HCA Sees

| Common Mistake | Compliance Concern |
| --- | --- |
| Report printed, but never reviewed | A report in the file does not demonstrate that staff evaluated or resolved the information. |
| Discrepancy left unresolved | The file contains conflicting income information without documentation showing how the property reached its final determination. |

| Common Mistake | Compliance Concern |
|---|---|
| New employment not followed up | The New Hires information indicates employment but there is no documented resident contact, verification, or certification decision. |
| Incorrect reliance on EIV | Staff use historical EIV information as if it automatically represents anticipated income without applying the proper verification and calculation process. |
| Missing documentation | The property verbally resolves an issue but does not retain the supporting verification, correspondence, or clarification. |
| Poor tenant communication | Residents receive vague requests or accusatory communication rather than a clear explanation of what needs to be verified. |
| EIV security weaknesses | Reports are left unsecured, shared with unauthorized staff, or access rights are not properly managed. |
| Reports not run on schedule | Required periodic or event-driven EIV reviews are missed because the property has no report calendar or assigned responsibility. |

## A Simple EIV Compliance Workflow

- **1. Know which reports apply and when they must be reviewed.** Build a written EIV reporting calendar based on current HUD requirements.
- **2. Assign responsibility.** Identify who runs reports, who performs resident follow-up, who processes corrections, and who performs quality control.
- **3. Track unresolved items.** Maintain a log of discrepancies, new hires, identity issues, duplicate-assistance concerns, deceased-tenant matches, and other open items.
- **4. Document every resolution.** Do not close an EIV issue until the file supports the conclusion.
- **5. Perform quality-control sampling.** Periodically review completed files to confirm EIV procedures are actually being followed.
- **6. Train staff whenever procedures change.** EIV should be integrated with the property's broader HUD income, asset, recertification, HOTMA, and privacy procedures.

## EIV and HOTMA in 2026

Property managers should also understand that EIV procedures operate within HUD's evolving HOTMA implementation framework. HUD's current Multifamily HOTMA guidance states that the deadline for full compliance with the HOTMA Final Rule and revised income and asset documentation standards for income certifications has been extended to January 1, 2027. Properties should therefore make sure their EIV policies, income-verification procedures, Tenant Selection Plan, forms, software workflow, and staff training reflect the HUD guidance that currently applies to their implementation status.

## How Housing Consultants of America Can Help

Housing Consultants of America (HCA) can help affordable housing owners and management companies evaluate whether EIV is being used consistently and documented correctly across their properties. HCA's third-party compliance reviews can identify missing reports, unresolved discrepancies, incomplete verification, weak tenant-file documentation, security or procedural concerns, and patterns that may create risk during an MOR or other compliance review.

- **Third-party HUD file audits** with EIV documentation review.

- **MOR preparation** to identify EIV and occupancy weaknesses before the formal review.
- **EIV policy and procedure review** for consistency with current property practices and HUD requirements.
- **Recertification and file-correction support** when unresolved EIV issues are contributing to a backlog.
- **Temporary HUD compliance specialists** during staffing shortages or large corrective-action projects.
- **Targeted EIV training** based on the errors and patterns identified in the organization's own files.

## EIV Compliance Should Be a Process - Not a Printout

The strongest EIV programs are built around consistent review, resident communication, documentation, resolution, security, and quality control. Printing a report is easy. Demonstrating that the property understood the information, investigated what needed investigation, followed HUD requirements, and documented the correct outcome is what makes the file audit-ready.

**For property managers, the goal should be simple: every EIV report that raises a question should lead to a documented answer.**

**Compliance Note:** EIV requirements vary by HUD program and can change through regulations, notices, handbooks, system guidance, and HOTMA implementation updates. This guide is educational and is not legal advice. Owners and management agents should confirm current requirements through HUD and their applicable contract administrator or regulatory guidance.

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EIV Compliance | HUD File Audits | MOR Preparation | Recertification Support | Temporary Compliance Staffing | Corrective Action & Training