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EIV Compliance Checklist: What Should Be in a HUD Tenant File?

A practical file-by-file guide for HUD Multifamily property managers and compliance teams

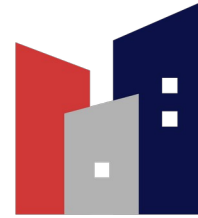


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EIV is one of the most important compliance tools in HUD-assisted housing - and one of the easiest places for a tenant file to tell an incomplete story. The goal is not simply to print an EIV report. The file should show that staff reviewed the information, compared it with tenant-reported information, investigated discrepancies when necessary, documented the resolution, and protected the resident's confidential data.

THE CORE PRINCIPLE

A reviewer should be able to open the tenant file and understand what EIV showed, what the household reported, what the owner/agent verified, and how the final income and rent determination was reached.



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Why EIV Documentation Matters

HUD's Enterprise Income Verification (EIV) system gives authorized housing professionals access to employment, wage, unemployment, Social Security, Supplemental Security Income, identity, and other data used to support accurate eligibility and rent determinations. HUD Handbook 4350.3, Chapter 9 addresses EIV use for Multifamily Housing and identifies documentation owners must maintain to demonstrate compliance.

EIV should be treated as a verification and discrepancy-resolution tool - not as a substitute for professional judgment. HUD guidance also makes clear that an owner may not take adverse action against a household based solely on EIV data. When information conflicts, the discrepancy must be investigated and resolved.

The HUD Tenant File: EIV Compliance Checklist

1. Current Consent and Authorization Documentation

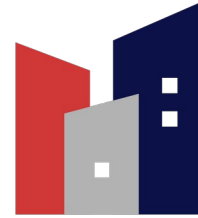
- ☐ Current HUD-required consent documentation applicable to the household is present before accessing EIV employment and income information.
- ☐ Required adult household members have signed and dated applicable consent/verification forms.
- ☐ Any individual verification authorizations required to verify income or eligibility factors are complete.
- ☐ Confidential forms and EIV information are maintained in a manner that protects resident privacy.

HUD Handbook 4350.3 states that a current HUD-9887 must be on file before an owner accesses EIV employment and income information for a tenant. Verification reports have different access rules, so staff should understand which report they are using and why.

2. EIV Income Report

- ☐ The applicable EIV Income Report is in the tenant file for the certification/review.
- ☐ Staff reviewed wages, unemployment compensation, Social Security and/or SSI information shown in EIV.
- ☐ The report was compared with income reported by the tenant.
- ☐ Current acceptable tenant-provided documentation is present when required.
- ☐ Third-party verification from the income source is included when required to resolve disputed or unverified information.

HUD identifies the EIV Income Report as required tenant-file documentation demonstrating use of EIV as a third-party source. If the tenant does not dispute EIV, the file should contain the EIV Income Report and current acceptable tenant-provided documentation, with third-party verification when the owner determines it is necessary. If EIV information is disputed, third-party verification from the source is required.



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3. Documentation for Income the Tenant Reported but EIV Did Not Verify

- ☐ The file identifies tenant-reported income that was not reflected or verified through EIV.
- ☐ Current acceptable tenant-provided documentation and/or third-party verification supports the income used.
- ☐ The final certification calculation is consistent with the verified information.
- ☐ The file contains a clear note explaining any material difference between EIV and the income used.

A blank or incomplete EIV record does not mean the income should be ignored. EIV data can lag, and some income may not appear in the system. The compliance question is whether the owner obtained acceptable verification and documented the income correctly.

4. Income Discrepancy Review and Resolution

- ☐ Any material EIV income discrepancy was reviewed.
- ☐ The tenant was given an opportunity to explain disputed information.
- ☐ Supporting documents were obtained when necessary.
- ☐ The file contains a written explanation or calculation showing how the discrepancy was resolved.
- ☐ Repayment, retroactive rent, interim recertification, or other corrective action is documented when applicable.

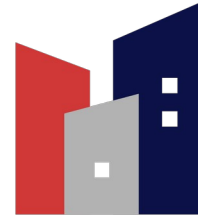
The strongest files do not merely contain a discrepancy report; they contain the resolution. A reviewer should not have to guess whether staff investigated the difference or simply filed the report.

5. New Hires Information

- ☐ New Hires information is reviewed in accordance with the property's EIV policies and HUD requirements.
- ☐ Potential new employment is discussed with the tenant when appropriate.
- ☐ Current income is verified before a rent or assistance determination is changed.
- ☐ Follow-up actions and conclusions are documented.

6. Identity Verification Issues

- ☐ Failed Verification/SSA identity issues are researched when a household member appears on the report.
- ☐ TRACS data is checked for data-entry errors.
- ☐ Supporting documentation is reviewed for the resident's name, Social Security number and date of birth, as applicable.
- ☐ Corrections and follow-up actions are documented.



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HUD's EIV materials include Failed Verification and identity-related reports designed to identify data mismatches. A clean file documents both the problem and what the site did to correct or resolve it.

7. Multiple Subsidy and Existing Tenant Search

- ☐ The Existing Tenant Search is used as required during applicant screening.
- ☐ The property's Tenant Selection Plan contains written policies addressing use of the Existing Tenant Search.
- ☐ Potential multiple-subsidy situations are investigated and resolved before final action.
- ☐ Documentation supporting the final eligibility decision is retained.

HUD Handbook 4350.3 requires owners to use the Existing Tenant Search as part of screening for new tenants and to include written policies for its use in the Tenant Selection Plan.

8. Deceased Tenant Information

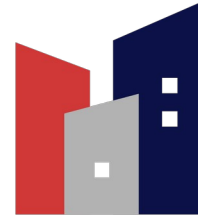
- ☐ Deceased Tenants information is reviewed under the property's established EIV procedures.
- ☐ Any apparent match is researched before action is taken.
- ☐ TRACS and tenant-file records are corrected when appropriate.
- ☐ The investigation and resolution are documented.

What Should NOT Happen in an EIV File

- An EIV report is printed and filed with no evidence that anyone reviewed it.
- A discrepancy is identified but no resolution is documented.
- Staff rely exclusively on EIV when the tenant disputes the information.
- A tenant is denied, terminated, or otherwise adversely affected solely because of EIV data without appropriate investigation.
- EIV reports are left unsecured or accessible to staff who do not have a legitimate need for the information.
- The property has EIV procedures on paper, but actual file practices do not match them.

The EIV Master File Is Different From the Tenant File

Not every EIV compliance document belongs in an individual tenant file. Owners should also maintain required property-level or master-file documentation supporting EIV administration and security. This may include EIV access authorization records, Rules of Behavior documentation, user certifications/recertifications, policies and procedures, security documentation, and required periodic reports with evidence of follow-up.



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HUD's Multifamily EIV access guidance states that EIV Coordinators must be recertified annually and EIV Users must be recertified by Coordinators semiannually. These administrative controls are important MOR and audit-readiness items even though they are not the same as household-level income verification.

HCA's Recommended EIV File Review Sequence

- ☐ Confirm the certification type and effective date.
- ☐ Confirm required consent documentation is current.
- ☐ Review the EIV Income Report and compare it with the tenant interview/questionnaire.
- ☐ Compare EIV with paystubs, benefit letters, employer documentation, or other acceptable verification.
- ☐ Identify income that appears in EIV but was not reported by the tenant.
- ☐ Identify income reported by the tenant but not reflected in EIV.
- ☐ Investigate discrepancies and obtain third-party verification when required.
- ☐ Review applicable identity, new-hire, multiple-subsidy, or other EIV information.
- ☐ Document every material follow-up and resolution.
- ☐ Recalculate income/rent if the investigation changes the certification.
- ☐ Perform a final quality-control review before closing the file.

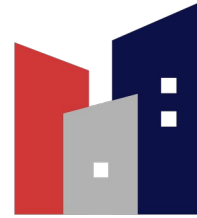
Five Questions an MOR Reviewer Should Never Have to Ask

- Did anyone actually review this EIV report?
- Why does EIV show income that is missing from the certification?
- Why did the property disregard the tenant's explanation?
- Where is the verification supporting the income used?
- How was this discrepancy ultimately resolved?

If the tenant file answers those questions before they are asked, the property is in a much stronger compliance position.

How Housing Consultants of America Can Help

Housing Consultants of America helps owners, management companies, housing authorities, nonprofits, and affordable housing teams strengthen EIV compliance before a finding becomes a problem. HCA can assist with 100% tenant-file audits, MOR preparation, EIV compliance reviews, policy and procedure development, recertification backlog recovery, temporary compliance staffing, and staff training.



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For properties with inconsistent EIV documentation, HCA can review existing files, identify patterns, create corrective workflows, and help staff build a repeatable process that makes each file easier to review and defend.

Official HUD Resources

- HUD Handbook 4350.3 REV-1, Chapter 9 - Enterprise Income Verification (EIV).
- HUD Handbook 4350.3, Chapter 3 - consent and verification requirements.
- HUD Multifamily EIV Application and Online Access guidance.
- HUD EIV Report Checklist and EIV report-use guidance.

Compliance note: This article is intended as a practical educational guide. EIV requirements can vary by HUD program and can be affected by current notices, forms, implementation guidance, and property-specific circumstances. Always confirm the current HUD requirements that apply to the property.

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HUD Compliance • EIV Reviews • File Audits • MOR Preparation • Staffing • Training

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