

DIGHTON HOUSING AUTHORITY WAGE MATCH POLICY

It is the policy of the Dighton Housing Authority (DHA) to participate in the Wage Match for State Housing Program Tenants. The DHA requires each head of household and all adult household members (age 18 and over) residing in state-aided public housing to participate in Massachusetts Wage Reporting System. The purpose is to verify the income of households. This will be done by matching the income and assets reported by each head of household and adult household member (age 18 and older) of each household with wages reported by employers to the Massachusetts Department of Revenue (DOR).

The DHA requires the head of household and all adult household members (age 18 and over) residing in state-aided public housing to sign an Income/Asset/Tax Match Authorization Form. All households are required to comply and failure will be a violation of their Lease and the matter will be forwarded to our Attorney for eviction. The Social Security Numbers (SSN) and the names of the head of household and all adult members of the household will be forwarded by the DHA to the state agency, the Department of Housing and Community Development (DHCD), which administers the state-aided public housing programs. DHCD will forward this information to the DOR. The information reported to the DHA concerning residents income and assets will be matched with wage reporting information reported by employers to the DOR. The DOR will provide DHCD with information from its records as to residents reported wages and DHCD will inform the DHA of this information.

Tenant Information:

Before all head of households and adult household members (age 18 and older) sign the Income/Asset/Tax Match Authorization Form they are informed of the following information:

1. In accordance with state law (chapter 43 of the Acts of 1997, section 174: 760 CMR 6.05 (3)), it is mandatory that each head of household and adult household member (age 18 and over) disclose to us his or her social security number. Failure by head of household or any adult (age 18 or over) household member to provide this Agency with a social security number is grounds for termination of the household's tenancy.
2. We will use and hold your social security number and information obtained from the Department of Revenue and DHCD in our records only for the purposes described above unless we get your consent to use it for any additional purposes.
3. We will keep the wage reporting information confidential. Only employees of this Agency and the other agencies or entities described above may see this wage reporting information or keep it in their records for the purposes described above. These other agencies or offices will also keep the information confidential. If we receive a legal order to release the information to anyone else, we will notify you.
4. If you ask, you or your authorized representatives have a right to inspect and copy information collected about you.
5. If you ask, we will answer your questions about how we keep and use this information.
6. You may object to the accuracy, completeness, pertinence, timeliness, relevance, use or dissemination of information we hold about you. If you object, we will investigate your objection and will either correct a problem or make your objection part of the file. If you are dissatisfied, we will further inform you of any additional opportunity for appeal.

Confidentiality and Controls:

Because the DHA, through this system, has access to "personal data" as defined by M.G.L.c.66A, it will ensure the confidentiality of information requested and received through the Wage Match System. The DHA does comply with all applicable laws and regulation relating to confidentiality and privacy, including but not limited to M.G.L.c.62E, M.G.L.c.66A, 760 CMR 4.00 and 801 CMR 3.00. The Executive Director of the DHA is responsible for ensuring the security and confidentiality of the wage reporting information entrusted to him or her. The only employee who will have access to the wage reporting information will be the Executive Director. The Executive Director does understand the severe penalties associated with any misuse of this information. No other employee or person under the DHA's control, or on the premise, may inspect, disclose or browse the wage reporting information for any purpose.

The DHA is aware that any unauthorized disclosure of wage reporting information will result in the immediate termination of the DHA's authorization to receive such information. As a holder of personal data, an unauthorized disclosure of wage reporting information may subject the DHA to the payment of monetary damages. In addition, an unauthorized release of wage reporting information may subject an employee to a fine.

Procedures for Handling Cases of Income Discrepancy:

The information obtained from DOR will be compared with income information reported by tenants for rent determination to see if there are any significant discrepancies. Significant in this case is defined as a difference between a household's income, based on information from DOR and that reported by the tenant, of ten percent or more. Cases of discrepancy will be identified in the manner described below:

- A. Identifying Cases of Income Discrepancy: The DHA will compare income and asset information reported by members of a tenant household with wage reporting information provided by DOR. The DHA will use its best judgment to identify cases where there is a discrepancy of ten percent or greater. This ten percent figure triggers a rent re-determination under 760 CMR 6.00 and 760 CMR 49.00. When DHA believes a tenant probably has income that exceeds this ten percent threshold, the DHA will ask the tenant to explain the difference at a meeting with the DHA Executive Director.
- B. Meetings/Hearing Process: The DHA shall provide the tenant with an opportunity to explain the discrepancy.
 1. The tenant will be requested in writing to attend a meeting at the DHA with the Executive Director. The letter will state the purpose of the meeting and contain the information from DOR that will be discussed. The letter will ask the tenant to call the DHA to arrange for a mutually agreeable time.
 2. If the tenant does not contact the DHA the Housing Authority will make a reasonable effort to set up the meeting. If no meeting has been arranged with the tenant after three weeks from the date of the notification letter, the DHA will proceed to notify the tenant of his or her right to request a Grievance Hearing (See Step 5).
 3. At the meeting, the DHA Executive Director will discuss the information obtained from DOR concerning the tenant's wages and how it might affect the tenant's rent amount, or might be grounds for tenant's eviction or termination. The tenant will be given three weeks from the date of this meeting to provide income information, documentation, or other evidence that shows why the wage reporting information received from DOR is incorrect. The DHA will evaluate all information provided from the tenant.

4. The DHA will send a letter notifying the tenant of the action it will take, if any. If adverse action will be taken (i.e., increased rent, termination, or eviction), the DHA will ask the tenant to attend an additional meeting. The letter will state clearly how the tenant is to schedule the meeting and the deadline for doing so. The meeting should be held within three weeks of the date of the letter. Any adverse action the DHA plans to take shall commence following this meeting, if one is held, or at the end of the three-week period, if the tenant does not schedule or attend a meeting.
5. Tenants who feel aggrieved because of adverse action taken by the DHA are entitled to a grievance hearing according to procedures outlines in 760 CMR 6.08.

Reporting Adverse Actions to DHCD:

The DHA will report to DHCD any adverse actions they take for each tenant, such as evictions or termination proceedings, rent increases, or rent repayment arrangements. Any investigated and cleared cases will not be reported.

Approved by Board Action at its Tuesday, March 6, 2007 Meeting.