

Detailed Steps to Investigate and Document EIV Income Discrepancies

Policy Considerations

The Handbook does not provide clear step by step guidance on how to investigate and document EIV income discrepancies. Below we make recommendations on how to determine if an EIV income discrepancy is valid or invalid. These recommendations are based on our interpretation of the guidance in the Handbook and practical experience. Please consult the Compliance Department (at the company for which you work), your Contract Administrator and/or local HUD Field Office when establishing a policy for investigating and documenting EIV income discrepancies. In order to ensure Fair Housing compliance, we recommend that Owners develop an EIV Income Discrepancy Workflow and apply it consistently to all households. Also, in order to resolve an EIV income discrepancy, an Owner must investigate and document his/her findings in the tenant file (including applicable citations from the Handbook, Federal Register and/or 3rd party verifications) for all household members.

Disclaimer

Each and every EIV income discrepancy is unique. In order to conclude an EIV income discrepancy investigation, all documents contained in the tenant file must indisputably support the determination of the Owner. An Owner should never conclude an EIV income discrepancy investigation until and unless all documentation (required to make a determination of valid or invalid) has been received and/or thoroughly reviewed. If an Owner is unable to confidently make a determination (of valid or invalid) and/or fully document his/her decision using the detailed steps provided in this training, he/she should seek further guidance from the Compliance Department (at the company for which he/she works), his/her Contract Administrator and/or the local HUD Field Office.

NOTE: Log all administrative time spent as part of the investigation/resolution process (review of the EIV Reports, review of the tenant file, all communications with the tenant and/or other involved parties including phone calls, emails, in-person conversations, corrective actions, etc.)

1. Review the EIV Income Discrepancy Report, note the following (on the EIV income discrepancy case file checklist):
 - a. Effective Date of Action
 - b. Projected Annual Wages and Benefits from Form HUD-50059
 - i. This is the gross annual income for the **household** from income sources reportable in EIV based on the form HUD-50059 listed as the Effective Date of Action
 - c. Period of Income (POI) for Discrepancy Analysis
 - i. This is the 12 month period beginning 15 months prior to the Effective Date of Action
 - d. Actual Quarter Reported Annual Wages and Benefits from EIV Data
 - i. This is the gross annual income for the **household** from income sources reportable in EIV for the **Period of Income**
 - e. Annualized Last Quarter Reported Annual Wages and Benefits from EIV Data
 - i. This is the gross income annualized for the **household** from income sources reportable in EIV based on the **last quarter of the Period of Income**
 1. When there is a difference of \$2,400 or more between the Projected and either Actual or Annualized Last Quarter Reported Annual Wages and Benefits, an EIV Income Discrepancy Report is generated
2. Determine and review the most current form HUD-50059 with an action type of MI, AR, IR or IC that falls within the Period of Income, note the following (on the EIV income discrepancy case file checklist):
 - a. Projected income as reportable in EIV
 - i. As a reminder, reportable income includes business income, federal wages, military pay, nonfederal wages, unemployment, Social Security benefits, and Supplemental Security Income
3. Subtract Actual Reported Annual Wages and Benefits from EIV Data (1.d) from projected income from form HUD-50059 (2.a)
4. Subtract Annualized Last Quarter Reported Annual Wages and Benefits from EIV Data (1.e) from projected income from form HUD-50059 (2.a)
5. Determine if the difference between both actual and projected income and annualized last quarter and project income is less than the discrepancy cutoff threshold of \$2,400
6. If yes, the Owner may conclude that this is an Apparent Invalid EIV Income Discrepancy (no further investigation is necessary)
 - a. Best practice recommendations for resolving Apparent Invalid EIV Income Discrepancies:

- i. Add detailed notes to the EIV Income Discrepancy Report and EIV income discrepancy case file checklist to be filed in the tenant file to "tell the story"
 1. If EIV had used the household's projected income from the most current form HUD-50059 with an action type of MI, AR, IR or IC that falls within the Period of Income, an EIV Income Discrepancy Report would not have been generated because EIV would have compared reported income (on form HUD-50059) to actual and annualized last quarter income (in EIV) for the same time period
 - ii. Cite the Handbook, Federal Register and/or applicable 3rd party verifications in the tenant file
 - iii. Conclude the investigation
7. Review the EIV Income Report, note the following (on the EIV income discrepancy case file checklist):
 - a. Make a list of each household member's source of income, start date(s) (if available), and amount(s) as reported in EIV
 - i. The Income Report details all reportable sources of income (Employment, Unemployment, Social Security benefits, Dual Entitlement benefits, Medicare data and Supplemental Security Income) that each household member receives, regardless of age
 1. The first person listed on the Income Report is the Head of Household
 2. If the household member has no Employment Information, this box will state 'EIV received no Employment (W4) data'. Likewise, if there is no Wages Information, the EIV Income Report will state 'EIV received no income data'; if there is no Unemployment, Social Security, Dual Entitlement, Medicare, and/or Supplemental Security Income data, the EIV Income Report will state 'EIV received no benefit data'.
8. Review the most current form HUD-50059 with an action type of MI, AR, IR or IC that falls within the Period of Income, note the following (on the EIV income discrepancy case file checklist):
 - a. By household member, make a list of:
 - i. Form HUD-50059: Source(s) and amount(s) of projected income as reportable in EIV (which includes business income, federal wages, military pay, nonfederal wages, unemployment, Social Security benefits, and Supplemental Security Income)
 - ii. 3rd Party Verification(s): Source(s), start date(s) and averaged, annualized amount(s) of projected income from either the verification letter(s), tenant provided pay stubs, and/or EIV Income Report
 1. Be mindful of any circumstance(s) that warrants a 30-day notice of rent increase. Make a note of new and/or increased income start date(s), reported date(s), and certification(s) effective date(s).
9. Determine if there is an apparent explanation as why the EIV income discrepancy is invalid
10. If yes, the Owner may conclude that this is an Apparent Invalid EIV Income Discrepancy (no further investigation is necessary)
 - a. Best practice recommendations for resolving Apparent Invalid EIV Income Discrepancies:
 - i. Add detailed notes to the EIV Income Discrepancy Report and EIV income discrepancy case file checklist to be filed in the tenant file to "tell the story"
 1. (Examples include: new income requiring a 30 day notice of rent increase and SSI State Supplement Program (SSP) payments administered/paid by the state)
 - ii. Cite the Handbook, Federal Register and/or applicable 3rd party verifications in the tenant file
 - iii. Conclude the investigation
11. Determine if one or more household member qualifies for an allowable exclusion from income
12. If yes, add the amount of actual income (earned by the household member with the allowable exclusion) to the projected income reported on the most current form HUD-50059 with an action type of MI, AR, IR, or IC that falls within the Period of Income
13. Subtract Actual Reported Annual Wages and Benefits from EIV Data from the Projected Income from Form HUD-50059 (which now includes the amount of actual income (earned by the household member with the allowable exclusion))
14. Determine if the difference between actual and projected income is less than the discrepancy cutoff threshold of \$2,400

- a. If the amount of actual income (earned by the household member with the allowable exclusion) was included in the projected income reported on the most current form HUD-50059, the Owner would not have received an EIV Income Discrepancy Report for the household
15. If yes, the Owner may conclude that this is an Apparent Invalid EIV Income Discrepancy (no further investigation is necessary)
 - a. Best practice recommendations for resolving Apparent Invalid EIV Income Discrepancies:
 - i. Add detailed notes to the EIV Income Discrepancy Report and EIV income discrepancy case file checklist to be filed in the tenant file to "tell the story"
 1. EIV reports all gross employment income earned whereas the form HUD-50059(s) does not report excludable sources of income
 - ii. Cite the Handbook, Federal Register and/or applicable 3rd party verifications in the tenant file
 - iii. Conclude the investigation
16. Review all form HUD-50059s with an action type of MI, AR, IR or IC that fall within the Period of Income, note the following (on the EIV income discrepancy case file checklist):
 - a. By household member, make a list of:
 - i. Form HUD-50059(s): Source(s) and amount(s) of projected income as reportable in EIV (which includes business income, federal wages, military pay, nonfederal wages, unemployment, Social Security benefits, and Supplemental Security Income)
 - ii. 3rd Party Verification(s): Source(s), start date(s) and averaged, annualized amount(s) of projected income from either the verification letter(s), tenant provided pay stubs, and/or EIV Income Report
 1. Be mindful of any circumstance(s) that warrants a 30-day notice of rent increase. Make a note of new and/or increased income start date(s), reported date(s), and certification(s) effective date(s).
 - b. Review the corresponding back-up documentation (including any past EIV Income Report(s) run at time of certification) and calculations used to verify that the Owner calculated income/rent in accordance with the Handbook (notate the EIV Income Discrepancy Calculation Worksheet):
 - i. At Move-In or Initial Certification, confirm that the Owner calculated wage and/or unemployment income using the most recent, consecutive 4-6 pay stubs, averaged and annualized (for consistency with Annual and Interim Recertification income/rent calculation requirements per the Handbook)
 - ii. At Annual or Interim Recertification, confirm that the Owner calculated wage and/or unemployment income using the most recent, consecutive 4-6 pay stubs, averaged and annualized
17. Determine if there is an apparent explanation as to why the EIV income discrepancy is invalid based on a thorough review of the 3rd party documentation in the tenant file
18. If yes, the Owner may conclude that this is a Nonapparent Invalid EIV Income Discrepancy (no further investigation is necessary)
 - a. Best practice recommendations for resolving Nonapparent Invalid EIV Income Discrepancies:
 - i. Add detailed notes to the EIV Income Discrepancy Report and EIV income discrepancy case file checklist to be filed in the tenant file to "tell the story"
 1. (Examples include: new income requiring a 30 day notice of rent increase and SSI State Supplement Program (SSP) payments administered/paid by the state)
 - ii. Cite the Handbook, Federal Register and/or applicable 3rd party verifications in the tenant file
 - iii. Conclude the investigation
19. Determine if Owner miscalculation and/or error is the **sole** cause of the EIV income discrepancy

Note: The tenant is not obligated to reimburse the Owner for undercharges caused solely by the Owner's failure to follow HUD's procedures for computing rent or assistance payments (see Chapter 8, Paragraph 8-20.B.2, of the Handbook for more information).

 - a. If the Owner determines that Owner miscalculation and/or error is the **sole** cause of the EIV income discrepancy, he/she must determine when the miscalculation and/or error began (and obtain additional retroactive 3rd party verifications, if applicable)

Note: Be mindful of the form HUD-50059 effective on or before the Period of Income and/or 5-year look back period start date. Review this 50059 (even if the effective date is before the Period of Income or 5-year look back

period start date) to confirm income/rent as of the Period of Income or 5-year look back period start date and calculate the difference between the amount of rent the tenant should have paid and the amount of rent the tenant was charged.

- b. Complete the retroactive calculations to recalculate income/rent in accordance with the Handbook
- c. Determine and process new and/or correction form HUD-50059s, as applicable; keep in mind that the tenant cannot be charged retroactively for any portion of the discrepancy due to Owner miscalculation and/or error

20. Notify the tenant(s) in writing to (note date on the EIV income discrepancy case file checklist):

- a. Advise him/her of the possible EIV income discrepancy
- b. Request a meeting between management and all adult household members, within 10 days from the date of the letter, to discuss the possible EIV income discrepancy

21. Prepare for the tenant meeting:

- a. Review both lists of each household member's source of income, start date(s), and amount(s) as reported in EIV per review of the EIV Income Report(s) and as reportable in EIV per review of the signed/dated form HUD-50059(s) that falls within the Period of Income
- b. Determine retroactive 3rd party income verification(s) needed
 - i. Retroactive Employment Income Verification – identify the "Compensation Data Timeframe" based on the Period of Income through present, as applicable; confirm that a printout of gross earnings for the entire period is attached to the completed verification returned from the source. If it is not attached, request that the tenant obtain a printout of gross earnings from his/her employer.
 - ii. Retroactive Unemployment Income Verification – identify the "Compensation Data Timeframe" based on the Period of Income through present, as applicable; confirm that a printout of gross benefits for the entire period is attached to the completed verification returned from the source. If it is not attached, request that the tenant obtain a printout of gross benefits from the local State Workforce Agency (SWA).
 - iii. Only request a historical printout of gross benefits from SSA if the tenant disputes the benefit information reported on an Income Report and/or if the Owner cannot reconcile the benefit information reported on an Income Report. If a detailed printout of gross benefits is required, it can be obtained by the tenant from SSA using SSA's website (<http://www.socialsecurity.gov>) or toll-free number (1-800-772-1213).
- c. Create an EIV income discrepancy case file consisting of the following:
 - i. The Tenant Consent to Disclose EIV Income Information [Exhibit 9-4] document for tenant(s) signature to allow the Owner to disclose the information contained in the EIV Income and Income Discrepancy Reports with all adult household members present
 - ii. The EIV Income and Income Discrepancy Reports
 - iii. Tenant Statement of Accuracy of EIV Income Reports or Certification Page
 - iv. Forms HUD-9887 and HUD-9887-A for tenant signature (if the EIV Income Report was run for Annual Recertification)
 - v. All applicable retroactive 3rd party income verifications
- d. Create an EIV income discrepancy case file checklist to be affixed to the front of the file folder to detail each retroactive 3rd party income verification to be obtained

22. Conduct the tenant meeting utilizing the documents prepared in the EIV income discrepancy case file:

- a. Explain that the Federal Privacy Act (5 USC 552a, as amended) prohibits the disclosure of an individual's information to another person without the written consent of such individual
- b. Provide the Tenant Consent to Disclose EIV Income Information [Exhibit 9-4] document for tenant(s) signature to allow the Owner to disclose the information contained in the EIV Income and Income Discrepancy Reports with all adult household members present
 - i. If all adult household members sign the Tenant Consent to Disclose EIV Income Information [Exhibit 9-4], the Owner may proceed with the tenant meeting with all adult household members present
 - ii. If one or more adult household member(s) refuses to sign the Tenant Consent to Disclose EIV Income Information [Exhibit 9-4], the Owner must conduct separate tenant meetings to ensure that no unauthorized disclosure of EIV income information occurs

NOTE: The Owner is not prohibited from discussing with and/or showing the head of household how the household's income and rent was determined based on the total income reported and verified

- c. Review the EIV Income and Income Discrepancy Reports with each adult household member(s)
 - d. Obtain written certification from each adult household member(s) only as it pertains to him/herself as to the accuracy or inaccuracy of the information contained in the EIV Income and Income Discrepancy Reports
 - e. If the EIV Income Report was run for Annual Recertification, obtain tenant signature(s) on forms HUD-9887 and HUD-9887-A
 - f. Obtain tenant signature(s) on the Authorization to Release Information section of each retroactive 3rd party income verification
23. Send out the retroactive 3rd party income verification(s) for each adult household member, as applicable
- a. If sending out a Retroactive Employment Income Verification, we recommend the following as a best business practice:
 - i. Reach out to the tenant's place of employment to determine the name and contact information of the individual authorized to provide the requested information
 - ii. Subsequently contact that individual to communicate that he/she will receive the Retroactive Employment Income Verification and request that he/she complete and return the form as quickly as possible
24. Notate the following on the EIV income discrepancy case file checklist:
- a. The name of each adult household member(s) and if he/she signed or refused to sign the Tenant Consent to Disclose EIV Income Information
Important Note: At all times the Owner must be conscientious in order to prevent disclosure of EIV income information to unauthorized individuals if one or more adult household member(s) refuses to sign the Tenant Consent to Disclose EIV Income Information
 - b. The date that each retroactive income verification was sent to the 3rd party source, as applicable
 - c. The date that the historical printout of gross benefits (as well as Medicare Data premiums) was requested from the tenant(s), as applicable
25. As each retroactive 3rd party income verification is received, review it for thoroughness
- a. If any critical information is missing from a retroactive 3rd party income verification (i.e. dates, amounts, printouts, etc.), contact the source to obtain the missing information and notate follow-up dates on the EIV income discrepancy case file checklist
 - b. If an Owner fails to receive a Retroactive Unemployment Income Verification, we recommend advising the tenant to contact the local State Workforce Agency (SWA) to mail a printout of historical benefits to the Owner's office
 - c. In the rare case that an Owner is unable to obtain a retroactive 3rd party income verification(s), the Owner should mail an IRS Form 4506-T Request for Transcript of Tax Returns to the IRS
Note: Taxes should ONLY be used as secondary compensation verification. Because taxes do not detail earnings received on a pay and/or benefit period basis, Owners will not be able to determine the date that unreporting, under-reporting or over-reporting of income started. In the rare circumstance that no compensation detail is available from the source(s) (i.e. company out of business and/or refuses request), tax statements will be the only option to determine income.
26. Once all of the critical information requested on each retroactive 3rd party income verification is obtained, note the date received on the EIV income discrepancy case file checklist
27. Work diligently during and immediately after the tenant meeting to obtain all documents listed on the case file checklist as quickly as possible. Send follow up verifications, conduct reminder phone calls, etc. as often as needed to finalize the checklist.
- a. Keep in mind HUD's timeframe requirements for resolving EIV income discrepancies and work on the EIV income discrepancy case accordingly
 - b. All EIV Income Discrepancies must be thoroughly investigated and documented. As a best business practice, we do not believe that final calculations can be accurately completed for valid EIV income discrepancies until all retroactive 3rd party income verifications have been received. Therefore, we recommend that Owners do not begin any calculations until all verifications are received.

NOTE: By this time, the Owner should have reviewed the following documents, as applicable to the household, and completed the EIV income discrepancy case file checklist:

- 1. EIV Income Discrepancy Report;
- 2. EIV Income Report(s) for the Period of Income;

3. Any Other Applicable EIV Report(s) for the Period of Income;
 4. Copies of all form HUD-50059s processed and submitted to TRACS for the Period of Income, as applicable;
 5. Copies of all original 3rd party income verifications, including back-up documentation and calculation worksheets, for the Period of Income, as applicable;
 6. Copies of newly obtained retroactive 3rd party income verifications, including detailed wage printouts and/or benefit statements, for the Period of Income, as applicable
28. Calculate the actual **monthly** income earned by the household for each **month** during the Period of Income. To accomplish this, complete the following:
- a. By household member and income source, review the newly obtained detailed wage printouts and/or benefit statements to determine the **monthly** amount of gross income earned
 - b. For each **month** during the Period of Income, subtotal all amounts of monthly gross income earned by all household members to calculate the cumulative actual **monthly** income earned by the household
29. Calculate the projected **monthly** income reported by the household at certification(s) for each **month** during the Period of Income. To accomplish this, complete the following:
- a. Review each form HUD-50059 processed during the Period of Income to determine the household's projected **monthly** income as reportable in EIV (which includes business income, federal wages, military pay, nonfederal wages, unemployment, Social Security benefits, and Supplemental Security Income)
 - i. Determine the Total Non-Asset Income (field 74 on form HUD-50059)
 - ii. Subtract income received from sources that are not reportable in EIV, such as welfare and/or TANF benefits, SSP Payments, child support, alimony, recurring gifts, and wages that are not included in the NDNH database, to determine the household's projected income as reportable in EIV
 - iii. Divide that number by 12 to determine the projected **monthly** income reported by the household at certification(s)
 1. For example, the POI is 03/01/2013 – 02/28/2014
 2. Per review of the tenant file, a 03/01/2013 AR and an 11/01/2013 IR were processed for the household during the POI
 3. Per review of the 03/01/2013 AR, the Owner determines that the Total Non-Asset Income amount (field 74 on form HUD-50059) is \$22,000; however, \$4,000 is income from child support. The Owner calculates $\$22,000 - \$4,000 = \$18,000 / 12 = \$1,500$. The household's projected **monthly** income as reportable in EIV for 03/01/2013-10/31/2013 (8 months) is \$1,500.
 4. Per review of the 11/01/2013 IR, the Owner determines that the Total Non-Asset Income amount (field 74 on form HUD-50059) is \$28,000; however, \$4,000 is income from child support. The Owner calculates $\$28,000 - \$4,000 = \$24,000 / 12 = \$2,000$. The household's projected monthly income as reportable in EIV for 11/01/2013-02/28/2014 (4 months) is \$2,000.
30. Compare the household's actual monthly income to projected monthly income for each month during the Period of Income to determine if there is a difference of \$200 or more
- a. If yes, compare actual monthly income to projected monthly income by household member and source to determine the source(s) of the discrepant income
31. Determine if the **sole** cause of the EIV income discrepancy is due to over-reported income from tenant failure to request an Interim Recertification for a decrease in income
32. If yes, the Owner may conclude that this is a Nonapparent Invalid EIV Income Discrepancy (no further investigation is necessary (see below))
33. Determine if there is an apparent explanation as to why the EIV income discrepancy is invalid **for the household**
34. If yes, the Owner may conclude that this is a Nonapparent Invalid EIV Income Discrepancy (no further investigation is necessary)
- a. Best practice recommendations for resolving Nonapparent Invalid EIV Income Discrepancies:
 - i. Add detailed notes to the EIV Income Discrepancy Report and EIV income discrepancy case file checklist to be filed in the tenant file to "tell the story"
 - ii. Cite the Handbook, Federal Register and/or applicable 3rd party verifications in the tenant file
 - iii. Conclude the investigation (**for the household**)

Note: At this point in the investigation, we believe that the Owner will have ruled out all possible explanations that would make an EIV income discrepancy invalid. The remaining steps detail how to investigate and document a valid EIV income discrepancy.

35. Determine if the nonreporting and/or under-reporting of income began before the Period of Income start date for the discrepant source(s) of income
 - a. If yes, determine the 5-year look back period start date (notate the EIV income discrepancy case file checklist) and obtain additional detailed wage printouts and/or benefit statements **for the discrepant source(s) of income only**
 - i. If the EIV Income Report was run for Annual Recertification, the Owner can estimate the 5-year look back period start date, which will be determined by the most recent adult household member signature date on the new form HUD-9887
 - ii. If the EIV Income Report was run for Interim Recertification, the most recent signature date on the current form HUD-9887 completed during the last Annual Recertification, Move-In or Initial Certification will determine the 5-year look back period start date
 - iii. Confirm that the resident lived in the unit for the full 5-year look back period; if not, the investigation and retroactive documentation can only be requested back to the Move-In or Initial Certification date
 1. For example: If the most recent signature date on the current signed/dated 9887 on file is 12/3/2014, the 5-year look back start date will be 12/4/2009 (12/3/2014 + 1 day = 12/4/2014 minus 5 years = 12/4/2009), provided the resident moved in prior to 12/4/2009. If the resident moved in after 12/4/2009, on 12/15/2011 for example, the look back start date will be limited to 12/15/2011. The look back period end date is always "present"; therefore, the look back period/timeframe is 12/4/09 through present, or 12/15/2011 through present if the resident did not move in until 12/15/2011.
- Note:** HUD states that tenant's with unreported income that goes back further than 5 years can be reported to the HUD Office of Inspector General (OIG) for fraud
36. Determine the start date of the unreported and/or under-reported income based on the retroactive 3rd party income verification(s) obtained for the discrepant source(s) of income

Note: Be mindful of the form HUD-50059 effective on or before the start date of the Period of Income and/or 5-year look back period. Review this form HUD-50059 (even if the effective date is before the start date of the Period of Income or 5-year look back period) to confirm income/rent as of the start date of the Period of Income or 5-year look back period and calculate the difference between the amount of rent the tenant should have paid and the amount of rent the tenant was charged.

Note: The tenant is not obligated to reimburse the Owner for undercharges caused solely by the Owner's failure to follow HUD's procedures for computing rent or assistance payments.
37. Complete retroactive calculations, as applicable, to confirm the amount(s) of income that must be reported on form HUD-50059(s) for the discrepant source(s) of income
38. Determine and process new and/or correction form HUD-50059s, as applicable
39. Fully document the tenant file, providing a brief summary of the issue, investigation and findings. Include the following:
 - a. EIV Income Discrepancy Report;
 - b. EIV Income Report(s) for the Period of Income and/or 5-year look back period, as applicable;
 - c. EIV Income Discrepancy Case File Checklist and Worksheets;
 - d. Any Other Applicable EIV Report(s) for the Period of Income and/or 5-year look back period, as applicable;
 - e. Copies of all form HUD-50059s processed and transmitted to TRACS for the Period of Income and/or 5-year look back period, as applicable;
 - f. Copies of all original 3rd party income verifications, including back-up documentation and calculation worksheets for the Period of Income and/or 5-year look back period, as applicable;
 - g. Copies of newly obtained retroactive 3rd party income verifications (detailed wage printouts and/or benefit statements) for the Period of Income and/or 5-year look back period, as applicable
 - h. Retroactive calculations, as applicable, to resolve the discrepant source(s) of income
40. Complete an EIV Repayment Calculation Worksheet to calculate the difference between the amount of rent the tenant(s) should have paid and the amount of rent the tenant(s) was charged and determine the amount of the repayment agreement
41. Print all new and/or correction form HUD-50059s and the calculations used to determine the amount of the repayment agreement in preparation for a follow up meeting with the tenant(s)

NOTE: If any portion of the discrepancy is due to Owner miscalculation and/or error, the tenant cannot be charged retroactively for that portion. The retroactive form HUD-50059s will need to be processed and HUD will need to be repaid; however, this money cannot be collected from tenant.

42. Send a 10-day letter to meet with the tenant(s)
43. Conduct a meeting with the tenant(s) to:
 - a. Review and discuss the results of the 3rd party income verification(s) obtained for the discrepant source(s) of income
 - b. Inform the tenant of the repayment amount due and his/her obligation to reimburse the Owner
 - c. Provide the tenant with a copy of the repayment calculation / retain a copy in the tenant file
 - d. Negotiate the terms of the EIV repayment agreement with the tenant(s)
 - e. Complete, sign and date the EIV repayment agreement with the tenant(s)
 - f. Review, sign and date all applicable new and/or correction form HUD-50059s
44. Process the new and/or correction form HUD-50059s and the EIV repayment agreement in your property management software