

## **Instructions for Preparing Chapter 7: Verification**

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### **INTRODUCTION**

This chapter describes HUD regulations and PHA policies related to verification of all information that is used to establish the family's eligibility and level of assistance as follows:

Part I: General Verification Requirements

Part II: Verifying Family Information

Part III: Verifying Income and Assets

Part IV: Verifying Mandatory Deductions

The PHA must follow Notice PIH 2010-19, and this chapter summarizes those requirements and provides supplementary PHA policies

### **PART I: GENERAL VERIFICATION REQUIREMENTS**

#### **7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION**

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information. This requires the signing of release forms by family members. While it is required that PHAs use form HUD-9886, this form does not release all the information necessary to the administration of the program. The PHA must develop its own release forms to cover all other necessary information. Families must agree to sign all consent forms required by the PHA and HUD. There are penalties for failure to comply with this requirement.

**No PHA policy decisions are required.**

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### 7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

#### HUD's Verification Hierarchy

This section in the model plan lists the HUD-established hierarchy of verification methods as described in Notice PIH 2010-19. Reference to this hierarchy is made throughout the remainder of the plan. In some cases HUD expects the PHA to use a combination of methods in order to obtain the most reliable information.

Each of the verification methods is discussed in subsequent sections below.



**Decision Point: What process will the PHA follow to verify family information?**  
(Model plan, p. 7-2)

#### Things to Consider

- The model plan language is based on HUD's verification hierarchy as contained in Notice PIH 2010-19.
- PHAs must obtain third-party verification or document why third party verification was not available [24 CFR 982.516(a)]. Following the HUD hierarchy will help ensure that this requirement is met.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

In order of priority, the forms of verification that the PHA will use are:

Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system

Up-front Income Verification (UIV) using a non-HUD system

Written Third Party Verification (may be provided by applicant or participant)

Written Third-party Verification Form

Oral Third-party Verification

Self-Certification



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

#### Requirements for Acceptable Documents

When document review is necessary or desired, it is important to give PHA staff guidance on what is acceptable.

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**Decision Point: What are the PHA's requirements for acceptable documents?  
(Model plan, p. 7-2)**

Things to Consider

- In Notice PIH 2010-19, HUD states that documents submitted should be dated within 60 days of the reexamination or PHA request date.
- The condition of the document is vital to its integrity and usefulness. There should be no sign of tampering with the information. Documents are unacceptable if they have been damaged to the extent or written in a manner that the information is not useable. The format of the document is less important. Unless there is reason to believe the document is not authentic or that the information has been altered, print-outs from web pages should be acceptable.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 calendar days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.

Print-outs from Web pages are considered original documents.

The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to the PHA and must be signed in the presence of a PHA representative or PHA notary public.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### File Documentation

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this plan. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.



**Decision Point: How will the PHA ensure that the family file is documented with information applicable to the income and rent calculation determinations? (Model plan, p. 7-3)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will document, in the family file, the following:

Reported family annual income

Value of assets

Expenses related to deductions from annual income

Other factors influencing the adjusted income



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### 7-I.C. UP-FRONT INCOME VERIFICATION (UIV)

#### Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. HUD requires the PHA to use the EIV system in its entirety. The following policies apply to the use of HUD's EIV system.

#### *EIV Income Reports*



**Decision Point: How will the PHA use income reports from the EIV system? (Model plan, p. 7-4)**

#### Things to Consider

- Because EIV data is based on information from the PIC system, income information for new admissions is not available.
- The model plan states that the income reports will be used for all annual reexaminations. Income reports must also be reviewed as part of the interim reexamination process.
- PHA policies should address what action(s) a PHA will take if the PHA determines through use of the EIV system that a family has concealed or under-reported income. Rather than repeating the policies here, the model plan language refers to Chapter 14, Program Integrity where these policies are already contained.

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- Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.

Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C. and in this chapter.

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income reports will be retained in participant files with the applicable annual or interim reexamination documents.

When the PHA determines through income reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

- Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### *EIV Identity Verification*

The EIV system verifies tenant identities against SSA records. These records are compared to PIC data for a match on social security number, name, and date of birth.

PHAs are required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2012-10].

When identity verification for a participant fails, a message will be displayed within the EIV system and no income information will be displayed.



**Decision Point: What actions will the PHA take when EIV identity verification fails? (Model plan, p. 7-5)**



*Option 1:* Use the model plan language shown below. No changes to the model plan are needed.

The PHA will identify participants whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

The PHA will attempt to resolve PIC/SSA discrepancies by obtaining appropriate documentation from the participant. When the PHA determines that discrepancies exist due to PHA errors such as spelling errors or incorrect birth dates, the errors will be corrected promptly.



*Option 2:* Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.

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### Upfront Income Verification Using Non-HUD Systems (Optional)



**Decision Point: What UIV sources will the PHA use? (Model plan, p. 7-6)**

#### Things to Consider

- PHAs must use HUD's EIV system in its entirety.
- Many PHAs are using UIV information in addition to HUD's EIV system. All sources of UIV income should be listed in this policy (e.g. TANF, Work Number, etc.). Informing applicants and participants of the use of UIV resources encourages more complete reporting.

**CAUTION:** You must insert or delete information here. The model plan does not contain language that can be adopted as-is.



*Option 1: Use the model plan language shown below. Insert additional sources of UIV as needed.*

The PHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:

HUD's EIV system

**[Insert any additional UIV sources used by the PHA]**



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### 7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be received directly from a third-party source or provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

#### Written Third-Party Verification [Notice PIH 2010-19]



**Decision Point: What are the requirements for acceptable third-party written verification? (Model plan, p. 7-6)**

##### Things to Consider

- Documents generated by a third party are now preferred over standardized third-party forms. The documents may be provided to the PHA by the family or by a third party.
- HUD defines written third-party verification as "an original or authentic document generated by a third party source." The PHA may only reject documents which are not original, appear to be forged, or are altered, mutilated, or illegible.
- While documents must generally be dated within 60 days of the PHA request or reexamination effective date, older documents are acceptable for confirming effective dates of income.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Third-party documents provided by the family must be dated within 60 days of the PHA request date.

If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.

As verification of earned income, the PHA will request require the family to provide the two most current, consecutive pay stubs.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### Written Third-Party Verification Form

While HUD considers standardized third-party forms to be less reliable than the third-party written verification described above, this form of verification is mandatory when the family cannot provide acceptable documentation. Written third-party verification is also required when there appears to be unreported income and other forms of verification are not available.



**Decision Point: When will the PHA obtain written third-party verification forms? (Model Plan, p. 7-7)**

Things to Consider

- Notice PIH 2010-19 states that this form of verification is mandatory when neither upfront verification nor written third-party verification are available.
- The PHA is also required to obtain the standardized forms as needed to resolve discrepancies identified as part of the annual or interim reexamination process.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will send third-party verification forms directly to the third party.

Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

### Oral Third-Party Verification [Notice PIH 2010-19]

Oral third-party verification is mandatory when neither form of written third-party verification is available. This method is typically used when an independent source fails to respond to a PHA request for written documentation.



**Decision Point: How will the PHA utilize oral third-party verifications? (Model plan, p. 7-7)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

In collecting third-party oral verification, PHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### When Third-Party Information is Not Required [Notice PIH 2010-19]

Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets or expenses when these items would have a minimal impact on the family's total tenant payment.



#### **Decision Point: When will the PHA make exceptions to the requirement for third-party verification? (Model plan, p. 7-8)**

##### Things to Consider

- Under HUD's current verification hierarchy, a family certification or declaration is the only non-third-party verification source. Therefore, when the PHA bypasses the third-party requirement, a self-certification is accepted.
- For example, if a family is unable to provide original bank statements, the PHA could elect to request a written third-party verification form from the bank. Alternatively, the PHA could determine that this method would not be cost-effective, in which case a self-certification would be accepted.
- The cost of verification cannot be passed on to the family.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

If the family cannot provide original documents, the PHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

#### ***Primary Documents***

No PHA policy decisions are required.

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### *Imputed Assets*

HUD permits PHAs to accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].



**Decision Point: How will the PHA verify the value of imputed assets? (Model plan, p. 7-8)**

Things to Consider:

- It could be difficult or impossible to obtain third-party verification of assets which the family no longer owns. The default policy allows the PHA to accept the family's certification in these situations.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### 7-I.E. SELF-CERTIFICATION

The PHA may require a family to certify that a family member does not receive a particular type of income or benefit, as well as when they do and third-party verification is not available. The PHA needs to provide staff guidance on the conditions for using self-certification.



#### **Decision Point: What is the PHA's policy on self-certifications? (Model plan, p. 7-8)**

##### Things to Consider:

- Self-certification is the least-preferred method of verification. It is to be used as a last resort when other verification sources are not available.
- The family's file must be thoroughly documented in order to explain why this verification method was used.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

The PHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a PHA representative or PHA notary public.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### PART II: VERIFYING FAMILY INFORMATION

#### 7-II.A. VERIFICATION OF LEGAL IDENTITY

Verification of legal identity is not required by regulations, but is recommended by HUD, notably in Notice PIH 2001-15 and in its appendix, the Improving Income Integrity Guidance Booklet. Since verification of legal identity is a PHA policy issue, the PHA can determine what forms of documentation are acceptable.



**Decision Point:** What is the PHA's policy on verification of legal identity? (Model plan, p. 7-9)



*Option 1:* Use the model plan language shown below. No changes to the model plan are needed.

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers	Certificate of birth
Church issued baptismal certificate	Adoption papers
Current, valid driver's license or Department of Motor Vehicles identification card	Custody agreement
U.S. military discharge (DD 214)	Health and Human Services ID
Current U.S. passport	Certified school records
Current employer identification card	

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed in the presence of a PHA representative or PHA notary public.

Legal identity will be verified for all applicants at the time of eligibility determination and in cases where the PHA has reason to doubt the identity of a person representing him or herself to be a participant.



*Option 2:* Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.

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### 7-II.B. SOCIAL SECURITY NUMBERS

The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing program participants as of January 31, 2010, who have either previously disclosed social security numbers HUD has determined to be valid, or who are 62 years of age or older and had not previously disclosed an SSN [24 CFR 5.216(g) and Notice PIH 2012-10].

The PHA may only reject documentation of an SSN provided by an applicant or participant if the document is not an original document or if the original document has been altered, mutilated, is illegible, or appears to be forged.



**Decision Point: If the PHA rejects documentation of an SSN, how long will the applicant or participant have to obtain and submit acceptable documentation? (Model plan, p. 7-10)**

#### Things to Consider

- HUD does not prescribe the exact amount of time in which an applicant or participant must submit acceptable documentation for social security numbers after the PHA has rejected documentation. This timeframe will largely depend on your PHA's other policies. However, because the timeframe of 90 days is specified in the regulations with regards to submitting documentation in similar circumstances, the default policy uses the 90-day timeframe in this context as well.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will explain to the applicant or participant the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### **Decision Point: Under what circumstances would the PHA grant an additional 90-day compliance period to an SRO individual? (Model Plan, p. 7-10)**

#### Things to Consider

- 24 CFR 5.216(h)(2) states that the PHA must grant the applicant an additional 90-day period to comply with the SSN disclosure and documentation requirement, if the PHA determines that the reason individual was unable to comply was due to circumstances that could not have reasonably been foreseen and were outside of the family's control.
- Notice PIH 2012-10 gives examples of such circumstances with regards to addition of a new household member. These include, but are not limited to delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, etc. The default policy both lists specific examples and leaves room for other circumstances to be considered.
- Your PHA may want to consider other PHA policies where time extensions are granted for circumstances beyond the family's control.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency. If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the PHA will terminate the individual's assistance.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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**Decision Point: Under what circumstances would the PHA grant an additional 90-day compliance period when adding a new household member under the age of 6 who has not been assigned an SSN? (Model Plan, p. 7-11)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*



**Decision Point: How will the PHA verify each disclosed SSN? (Model Plan, p. 7-11)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will verify each disclosed SSN by:

Obtaining documentation from applicants and participants that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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**Decision Point: Will the PHA destroy copies of documentation accepted as evidence of social security numbers? (Model Plan, p. 7-11)**

Things to Consider

- Notice PIH 2012-10 states that once the verification status is classified as “verified,” the PHA may remove and destroy copies of documentation of evidence of social security numbers.
- The notice encourages that PHAs minimize the number of records that display an individual’s full nine-digit SSN. The retention of the EIV report in the individual’s file is adequate documentation. These methods help to minimize the risk of exposing individuals’ SSNs.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Once an individual’s status is classified as “verified” in HUD’s EIV system, the PHA will remove and destroy copies of documentation accepted as evidence of social security numbers.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA’s policy.*

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### 7-II.C. DOCUMENTATION OF AGE

Regulations at 24 CFR 982.516(a)(2)(iv) state that in addition to income, assets, and deductions, the PHA must verify “other factors that affect the determination of adjusted income.” Such factors include spousal relationships, age, and citizenship status, among others. Age is especially important for determination of income and deductions when someone in the family is under 18 or is age 62 or older. Generally, a birth certificate or other official record of birth is the preferred form of age verification, and for elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable. The PHA needs to provide guidance to staff when these types of verification are not available.



**Decision Point: What will the PHA accept as verification of age when birth certificates or evidence of social security retirement benefits are not available? (Model plan, p. 7-12)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### 7-II.D. FAMILY RELATIONSHIPS

The relationship of each household member to the head of household may affect the determination of adjusted income and must therefore be verified [24 CFR 982.516(a)(2)(iv)]. Definitions of the primary household relationships are provided in Chapter 3. The PHA must give guidance to staff regarding the extent to which these relationships will be verified.

**Decision Point: How, and to what extent, will the PHA verify family relationships? (Model plan, p. 7-12)**

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

### Marriage

Marital status could affect the determination of total or adjusted income. Examples would be when the person designated as spouse of the head is working and under age 18, or if the head is not elderly or disabled but the person designated as spouse of the head is. It could also affect the family's eligibility for the program, depending on the PHA's definition of family. PHA staff needs guidance on what to do if some information causes staff to doubt the validity of the marital relationship.

**Decision Point: How will the PHA verify marital status? (Model plan, p. 7-12)**

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### Separation or Divorce

There may be situations where the PHA would need to verify a separation or divorce beyond the certification of the head of household. In these situations PHA staff needs guidance on what to do if some information causes staff to doubt the self-certification.

**Decision Point: How will the PHA verify a separation or divorce? (Model plan, p. 7-13)**

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to provide documentation of the divorce or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

### Absence of Adult Member

When an adult family member is reported as permanently absent, PHA staff needs guidance on how to verify the absence is permanent.

**Decision Point: How will the PHA verify the absence of an adult family member? (Model plan, p. 7-13)**

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill).

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### Foster Children and Foster Adults

When a family claims foster children or adults, the PHA needs to verify their status to properly calculate the family's income and deductions. Guidance needs to be provided as to how the status of foster children and adults will be verified.

**Decision Point: How will the PHA verify the absence of an adult family member?**  
(Model plan, p. 7-13)

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

### 7-II.E. VERIFICATION OF STUDENT STATUS

The status of a student family member could affect the income or deductions for a family. Therefore, guidance needs to be provided as to when student status is to be verified.

#### General Requirements

**Decision Point: Under what circumstances will the PHA verify student status?**  
(Model plan, p. 7-14)

*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family reports full-time student status for an adult other than the head, spouse, or cohead.

The family reports child care expenses to enable a family member to further his or her education.

The family includes a student enrolled in an *institution of higher education*.

*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

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### Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.



**Decision Point: How will the PHA verify that a student is subject to the eligibility restrictions in 24 CFR 5.612? (Model plan, p. 7-14)**

#### Things to Consider

- The model plan language clearly identifies the factors that must be verified in order for the PHA to determine whether a particular student is exempt from the eligibility restrictions contained in 24 CFR 5.612.
- The model plan language refers to other policies in the administrative plan. Referencing these sections reduces the need to duplicate those policies here.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

In accordance with the verification hierarchy described in Section 7-1.B, the PHA will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see Section Exhibit 3-2).

The student is at least 24 years old.

The student is a veteran, as defined in Section 3-II.E.

The student is married.

The student has at least one dependent child, as defined in Section 3-II.E.

The student is a person with disabilities, as defined in Section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the PHA cannot verify at least one of these exemption criteria, the PHA will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the PHA will then proceed to verify either the student's parents' income eligibility (see Section 7-III.J) or the student's independence from his/her parents (see below).



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

## Instructions for Preparing Chapter 7: Verification

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**Decision Point: How will the PHA verify that a student is independent from his/her parents for purposes of determining whether the parent's income is relevant in determining the student's eligibility? (Model plan, p. 7-15)**

### Things to Consider

- The criteria for determining independence from parents is contained in Section 3-II.E. If changes are made to the criteria in Chapter 3, the verification requirements in this section will need to be revised accordingly.
- The verification criteria included in the model plan follows the recommended language contained in the April 10, 2006, *Federal Register*.



Option 1: Use the model plan language shown below. No changes to the model plan are needed.

The PHA will verify a student's independence from his/her parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

Either reviewing and verifying previous address information to determine whether the student has established a household separate from his/her parents for at least one year or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of *independent student* (see Section 3-II.E)

Reviewing prior year income tax returns to verify whether a parent has claimed the student as a dependent

Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0.



Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.

## Instructions for Preparing Chapter 7: Verification

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### 7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income.

#### Family Members Receiving SSA Disability Benefits



**Decision Point: How will the PHA verify the disability status of family members who are receiving SSA Disability benefits? (Model plan, p. 7-16)**

#### Things to Consider

- Notice PIH 2004-18, issued on September 17, 2004, describes required procedures for verifying SS/SSI benefits of applicants and participants. If a disabled family member is receiving SSA disability benefits, verifying receipt of these payments serves as adequate verification of the family member's disability. Therefore this policy reflects the procedures required by, and recommended in, the Notice.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

For family members claiming disability who receive disability benefits from the SSA, the PHA will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the PHA will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from [www.ssa.gov](http://www.ssa.gov). Once the applicant or participant receives the benefit verification letter they will be required to provide it to the PHA.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

## Instructions for Preparing Chapter 7: Verification

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### Family Members Not Receiving SSA Disability Benefits



**Decision Point:** How will the PHA verify the disability status of family members who are not receiving SSA Disability benefits? (Model plan, p. 7-16)

#### Things to Consider

- In cases where a family is not receiving SSA Disability benefits, the PHA would follow its normal verification process and obtain third-party verification. This policy clarifies that a knowledgeable professional must provide third-party verification that a family member meets the HUD definition of disability.



*Option 1:* Use the model plan language shown below. No changes to the model plan are needed.

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.



*Option 2:* Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.

## Instructions for Preparing Chapter 7: Verification

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### 7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS

#### Overview

No PHA policy decisions are required.

#### U.S. Citizens and Nationals

HUD requires a declaration be signed by each family member (or by a guardian for minors) who claims to be a U.S. citizen or national. However, HUD states that a PHA may request further verification of the family member's status. Guidance must be provided as to when and how such verification will be required by the PHA.



**Decision Point: How and when will the PHA require additional verification of U.S. citizen or national status? (Model plan, p. 7-17)**



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*

#### Eligible Immigrants

No PHA policy decisions are required.

## Instructions for Preparing Chapter 7: Verification

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### 7-II.H. VERIFICATION OF PREFERENCE STATUS

PHAs determine their own local waiting list preferences.



**Decision Point: If the PHA offers waiting list preferences how will it verify preferences? (Model plan, p. 7-18)**

#### Things to Consider

- The model plan only includes a preference for families that have been terminated from the PHA's HCV program due to insufficient program funding. No other preferences are offered.
- The PHA will have the necessary documentation to verify this preference in its own files. The model plan language reflects this.
- If the PHA offers other local preferences, the PHA must also determine its methods of verification for those preferences (tenant provided documents, third party written, etc.). The PHA could extend the verification standards found in 24 CFR 982.516(a)(2) to preferences, but this is not mandatory.



*Option 1: Use the model plan language shown below. No changes to the model plan are needed.*

The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.



*Option 2: Use PHA-established policy. Edit the model plan language or delete it and insert the PHA's policy.*