

**Chapter 7**  
**VERIFICATION**

[24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230, Notice PIH [2023-272018-18](#)]

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## INTRODUCTION

The GRHC will verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The GRHC will not pass on the cost of verification to the family.

The GRHC will follow the verification guidance provided by HUD in Notice PIH ~~2018-18~~[2023-27](#) and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary GRHC policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the GRHC.

- Part I: General Verification Requirements. HUDs regulations specify what levels of verification are required to verify family eligibility and income. This part covers the general requirements and GRHC Policies on the verification process.
- Part II: Verifying Family Information. This part will cover the HUD and GRHC polices on verifying family information to determine eligibility.
- Part III: Verifying Income and Assets. Once a family is determined eligible, income verification is required to ensure the family is within HUD guidelines. This part covers the HUD and GRHC polices on verifying family income.
- Part IV: Verifying Mandatory Deductions. This part describes the verification required for deductions utilized to calculate adjusted gross income.

## PART I: GENERAL VERIFICATION REQUIREMENTS

### 7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516, ~~AND 982.551, 24 CFR 5.230; AND NOTICE PIH 2023-27~~]

#### Consent Forms

The family must supply any information that the GRHC or HUD determines is necessary to the administration of the program and must consent to the GRHC verification of that information [24 CFR 982.551; and Notice PIH 2023-27]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

#### Consent Forms Form HUD-9886A [24 CFR 5.230(b)(1), b(2), (c)(4), and (c)(5)]; Notice PIH 2023-27

~~It is required that~~ All adult applicants and participants must sign form HUD-9886A, Authorization for Release of Information at admission. Effective January 1, 2024, current program participants must sign and submit a new Form HUD-9886A at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886A will not be submitted to the GRHC except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the GRHC in administrative instructions.

Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886A at the family's next annual or interim reexamination, whichever is earlier.

The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the GRHC may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). ~~Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.~~

The GRHC may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the GRHC determines the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

#### **Penalties for Failing to Consent [24 CFR 5.232]**

If any family member who is required to sign a consent form fails to do so, the GRHC will deny admission to applicants and terminate assistance of participants. The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the GRHC to access financial records from financial institutions. The GRHC will not process interim or annual reexaminations of income without the family's executed consent forms.

The GRHC has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with GRHC policy.

In order for a family to revoke their consent, the family must provide written notice to the GRHC. Within 15 calendar days of the date the family provides written notice, the GRHC will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the GRHC will notify their local HUD office.

### **7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]**

The GRHC will not utilize other program income determinations as part of its certification process.

### **7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]**

HUD permits the GRHC to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years, the GRHC may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or other inflationary adjustment factor. Streamlining policies are optional.

Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.

The GRHC will use a streamlined income determinations where applicable.

- If 90 percent or more of a family's unadjusted income is from fixed income sources:
  - The GRHC will streamline the annual reexamination process by applying the verified inflationary adjustment factor to fixed-income sources. The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year. The GRHC will document in the file how the determination that a source of income was fixed was made. Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources. If the family's sources of fixed income have changed from the previous year, the GRHC will obtain third-party verification of any new sources of fixed income.
- When less than 90 percent of a family's unadjusted income consists of fixed income:

- The GRHC will apply a COLA to each of the family’s sources of fixed income. All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the GRHC will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

- Of all assets when net family assets exceed \$50,000;
- Of all deductions and allowances from annual income;
- If a family member with a fixed source of income is added;
  - If verification of the COLA or rate of interest is not available;
  - During the intake process and at least once every three years thereafter.

### **7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]**

When the GRHC does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the GRHC to obtain third-party verification of:

- Reported family annual income;
- The value of net family assets when the net value exceeds \$50,000 (as adjusted annually);
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

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

#### **HUD’s Verification Hierarchy [Notice PIH 2018-18]**

HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the GRHC to use the most reliable form of verification that is available and to document the reasons when the GRHC uses a lesser form of verification.

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

HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The GRHC will demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed.

In order of priority, the hierarchy is:

- Highest: Level 6: Up-front Income Verification (UIV) using HUD’s Enterprise Income Verification (EIV) system
- Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system
- High: Level 4:
  - Written third-party verification from the source, also known as “family-provided verification”

- Or EIV plus self-certification
- Medium: Level 3: Written third-party verification form
- Medium: Level 2: Oral third-party verification
- Low: Level 1: Self-certification (not third-party verification)

- ~~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~~

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

### **~~Requirements for Acceptable Documents~~**

~~Any documents used for verification must be dated within 60 calendar days of the GRHC request. The documents must not be damaged, altered or in any way illegible.~~

~~Printouts from Web pages and photos of documents are acceptable.~~

~~All documents will be dated with date of receipt by the GRHC.~~

~~Any family self-certifications must be made in a format acceptable to the GRHC and signed.~~

### **File Documentation**

The GRHC will 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 GRHC has followed all 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.

### **~~THE GRHC WILL DOCUMENT, IN THE FAMILY FILE WITH A CHECKLIST, THE FOLLOWING:~~**

- ~~REPORTED FAMILY ANNUAL INCOME~~
- ~~VALUE OF ASSETS~~
- ~~EXPENSES RELATED TO DEDUCTIONS FROM ANNUAL INCOME~~
- ~~OTHER FACTORS INFLUENCING ADJUSTED INCOME~~

~~WHEN THE GRHC IS UNABLE TO OBTAIN THIRD-PARTY VERIFICATION, THE GRHC WILL DOCUMENT IN THE FAMILY FILE THE REASON THAT THIRD-PARTY VERIFICATION WAS NOT AVAILABLE [24 CFR 982.516(A)(2); NOTICE PIH 2018-18].~~

### **7-I.EC. 7-I.E. LEVEL 5 AND 6 VERIFICATION: UP-FRONT INCOME VERIFICATION (UIV)**

Up-front income verification (UIV) refers to the GRHC's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits for a number of individuals. UIV will be used to the extent that these systems are available to the GRHC.

There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the GRHC has independently verified the UIV information and the family has been granted an opportunity to contest any adverse findings through the informal review/hearing process of the GRHC.

~~See Chapter 6 for the GRHC's policy on the use of UIV/EIV to project annual income.~~

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

The GRHC will use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during ~~mandatory annual and streamlined~~ reexaminations ~~or recertifications~~ of family composition and income in accordance with 24 CFR 5.236 and and Notice PIH 2023-27 administrative guidance issued by HUD. The HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families.

The income validation tool (IVT) in EIV provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with other departments.

The following policies apply to the use of HUD's EIV system.

#### ***EIV Income and IVT Reports***

The GRHC will obtain EIV income and IVT reports for all annual reexaminations for all families. The GRHC will ensure that all EIV Income Reports are pulled within 90 calendar days of the effective date of the annual reexamination.

Income and IVT reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV.

Income and IVT reports will be retained in participant files with the applicable annual documents or interim reexamination documents (if applicable) for the duration of the family's participation.

When the GRHC determines through EIV 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.



### *New Hires Report [Notice PIH 2023-27]*

The New Hires Report identifies participant families who have new employment within the last six months. The report is updated monthly.

In accordance with GRHC policies in Chapter 11, the GRHC does not process interim reexaminations for families who have increases in earned income. Except for instances in which the GRHC uses Safe Harbor income determinations to determine a family's annual income, the GRHC will only review the New Hires Report at annual reexamination.

### *No Income Reported by HHS or SSA Report*

The GRHC will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report.

The GRHC will re-verify the status of participants identified on the report quarterly. Based on the information provided by the family and in EIV, the GRHC will require that family members provide verifications or sign release forms in order to obtain additional verification.

When the GRHC determines through this report 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

The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between 3 and 6 months old at the time reports are generated.

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

Income and IVT 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 and IVT 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 earned income, and to verify and calculate 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 and IVT reports will be retained in participant files with the applicable annual or interim reexamination documents.

When the GRHC determines through EIV 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.

### *EIV Identity Verification Report*

The EIV system verifies tenant identities against SSA records. These records are compared to [PIC-HUD](#) data for a match on social security number, name, and date of birth. [When identity](#)

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

~~The GRHC will to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2018-18]. When identity verification for a participant fails, a message will be displayed within the EIV system and no income information will be displayed.~~

The GRHC will attempt to resolve PIH/SSA discrepancies by obtaining appropriate documentation from the participant. When the GRHC determines that discrepancies exist as a result of due to GRHC errors such as spelling errors or incorrect birth dates, ~~the errors will be corrected~~ it will correct the errors promptly.

#### **Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]**

The GRHC will review the Deceased Tenants Report on a monthly basis. The GRHC will list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.

When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for any rental assistance or continued occupancy. The GRHC will not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.

#### **Other EIV Reports [Notice PIH 2023-27]**

The GRHC is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

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

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

- HUD's EIV system
- IRS form 45060-T

#### **7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]**

HUD identifies two types of Level 4 verification: written-third party verification from the source and EIV + self-certification.

##### **EIV + Self-Certification**

At annual reexamination, if the GRHC is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the GRHC will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

The GRHC will use an average of the last two quarters of income listed in EIV to determine income from employment. The GRHC will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount

is not reflective of current income, or if less than two quarters are available in EIV, the GRHC will use written third-party verification from the source as outlined below.

The GRHC will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

### **Written Third-Party Verification from the Source**

Written, third-party verification from the source is also known as “tenant-provided verification.” In order to qualify as written-third party verification from the source, the documents must be original or authentic and (generally) dated within 120 days of the date received by the GRHC. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. Documents may be supplied by the family or received from a third-party source.

In general, the GRHC will use third-party verification from the source in the following circumstances:

At annual reexamination when EIV + self-certification is not used;

- For all new admissions; and
- For all interim reexaminations.

The GRHC will not use this method if the GRHC is able to use an income determination from a means-tested federal assistance program or if the GRHC uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the GRHC. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The GRHC may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the GRHC determines that third-party documents provided by the family are not acceptable, the GRHC will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the GRHC will obtain one (1) statement that reflects the current balance of the account.

When pay stubs are used, the GRHC will require the family to provide the two (2) most current, consecutive pay stubs. At the GRHC’s discretion, if additional paystubs are needed due to the family’s circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

## **7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM [Notice PIH 2023-27]**

This type of verification is a form developed by the GRHC and used uniformly for all families when needed to collect information from a third-party source. This is known as “traditional third-party verification.” the GRHC will send a self-developed form directly to the third-party source by mail, fax, or email and the source completes the form by hand (in writing or typeset).

The GRHC will use this method when higher forms are unavailable or are rejected by the GRHC or when the family is unable to provide acceptable verification. The GRHC may skip this level of verification and may instead substitute oral third-party verification before moving to self-certification.

Typically, the GRHC will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable.

However, on a case-by-case basis, the GRHC may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.

## **7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]**

### ~~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 GRHC by the family. If written third party verification is not available, the GRHC will 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 2018-18]~~

~~Written third party verification documents must be original and authentic and may be supplied by the family or received from a third party source. Third party documents provided by the family must be dated within 60 calendar days of the GRHC request date~~

~~Examples of acceptable tenant provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.~~

~~The GRHC is required to obtain, at minimum, two (2) current (within last 60 calendar days) and consecutive pay stubs for determining annual income from wages. At the GRHC’s discretion, if additional paystubs are needed due to the family’s circumstances (e.g., sporadic income, fluctuating schedule, etc.), the GRHC may request additional paystubs or a payroll record.~~

~~The GRHC may reject documentation provided by the family and request additional information if the document is not an original, appears to be forged, or is altered, mutilated, or illegible.~~

### **Written Third Party Verification Form**

~~When upfront verification is not available and the family is unable to provide written third-party documents, the GRHC will request a written third-party verification form.~~

~~The GRHC will mail, fax, email, or provide the verification directly to the participants third-party written verification form requests to third-party sources.~~

### **Oral Third-Party Verification [Notice PIH 2018-18]**

For third-party oral verification, The GRHC contact sources, identified by UIV techniques or by the family, by telephone or in person.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 15 calendar days.

The GRHC will document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed. When any source responds verbally to the initial written request for verification, the GRHC will accept it as oral verification but will also request that the source complete and return any verification forms provided.

In general, the GRHC will attempt to obtain written third-party verification via a form from the verification source. If written third-party verification forms are not returned within 15 calendar days, the GRHC will accept self-certification from the family without attempting to obtain oral third-party verification.

However, if the GRHC chooses to obtain oral third-party verification, the GRHC will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed

### **When Third-Party Verification is Not Required [Notice PIH 2018-18023-27]**

The GRHC 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, and will pursue alternative options to families.

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

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

#### ***Imputed Assets***

The GRHC will accept ~~a self~~self-certification from a family as verification of assets disposed of for less than fair market value.

#### ***Value of Assets and Asset Income [24 CFR 982.516(a)]***

For families with net assets totaling \$5,000 or less, the GRHC will accept the family's declaration of asset value and anticipated asset income. However, the GRHC will obtain third-party verification of all assets regardless of the amount during the intake process and at least every three years thereafter.

### **GRHC MTW Flexibility**

For families with net assets totaling \$50,000 or less, the GRHC will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration.

### **7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [NOTICE PIH 2023-27] 7-I.E. SELF-CERTIFICATION**

Non-third-party verification consists of a signed statement of reported income and/or expenses. This verification method will be used as a last resort when the GRHC has not been successful in obtaining information via all other required verification techniques. ~~When HUD requires third-party verification, self-certification or "tenant declaration," is used as a last resort when the GRHC is unable to obtain third-party verification.~~

Self-certification, however, is an acceptable form of verification when:

- A source of income is fully excluded
- Net family assets total \$50,000 or less and the GRHC has adopted a policy. See GRHC MTW Flexibility in Chapter 7.I.DD.
- The family declares that they do not have any present ownership in any real property
- A family states that they have non-recurring income that will not be repeated in the coming year; and/or
- The GRHC has adopted a policy to implement streamlined annual recertifications for fixed sources of income (See Chapter 11)

When the GRHC is required to obtain third-party verification but instead relies on self-certification, a tenant declaration for verification of income, assets, or expenses, the family's file will be documented to explain why third-party verification was not available. 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 GRHC.

The GRHC 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 GRHC 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 GRHC representative. All self-certifications will include the following language:

“I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802).”

**PART II: VERIFYING FAMILY INFORMATION**

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

The GRHC 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 Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicles identification card U.S. military discharge (DD 214) Current U.S. passport Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records

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

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

**7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216, Notice PIH 2023-2718-24]**

The family must provide documentation of a valid Ssocial Ssecurity 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 who were at least 62 years of age as of January 31, 2010, and had not previously disclosed ~~an~~a SSN.

Note that an individual who previously declared to have eligible immigration status may not change his or her declaration for the purpose of avoiding compliance with the SSN disclosure and documentation requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

The GRHC will accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual



While the GRHC must attempt to gather third-party verification of SSNs prior to admission as listed above, The GRHC also has the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if the GRHC has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, the GRHC will document why the other SSN documentation was not available.

If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then the GRHC will obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation.

The GRHC will 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. The GRHC 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 GRHC within 90 calendar days.

In the case of Moderate Rehabilitation Single Room Occupancy (SRO) individuals, the required documentation must be provided within 90 calendar days from the date of admission into the program. The GRHC will grant one additional 90-day extension if it determines that the applicant's failure to comply was due to circumstances that were beyond the applicant's control and could not have been reasonably foreseen. If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the GRHC will terminate the individual's assistance.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of voucher issuance, an otherwise eligible family may be admitted to the program and the family must provide documentation of the child's SSN within 90 calendar days of the effective date of the initial HAP contract. A 90-day extension will be granted if the GRHC determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control.

When a participant requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the participant must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The GRHC will not add the new household member until such documentation is provided.

When a participant requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the participant must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the GRHC determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control. During the period the GRHC is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

Social security numbers must be verified only once during continuously assisted occupancy.

Once the individual's verification status is classified as "verified," the GRHC will maintain copies of documentation of social security numbers for all household members in the file. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

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

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable. If an official record of birth or evidence of social security retirement benefits cannot be provided, the GRHC 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.

Age will be verified only once during continuously-assisted occupancy.

### **7-II.D. FAMILY RELATIONSHIPS**

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.

#### **Marriage**

A marriage certificate generally is required to verify that a couple is married. If unavailable, the GRHC will accept a [selfself](#)-certification.

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).

#### **Separation or Divorce**

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 or a self-certification from the head of household will be acceptable.

#### **Absence of Adult Member**

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).

#### **Foster Children and Foster Adults**

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

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

## General Requirements

The GRHC 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 childcare expenses to enable a family member to further his or her education.
- The family includes a student enrolled in an *institution of higher education*.

## 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.

In accordance with the verification hierarchy described in section 7-1.B, the GRHC 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 GRHC cannot verify at least one of these exemption criteria, the GRHC 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 GRHC 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).

### ***Independent Student***

The GRHC 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 the student’s prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education’s definition of *independent student* (see section 3-II.E)
- 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, except in cases in which the GRHC determines that the student is a *vulnerable youth* (see section 3-II.E)

## 7-II.F. DOCUMENTATION OF DISABILITY

The GRHC will verify the existence of a disability in order to allow certain income disallowances and deductions from income. The GRHC will ~~not~~ inquire about the nature or extent of a person’s disability [24 CFR 100.202(c)]. The GRHC will not inquire about a person’s diagnosis or details of treatment for a disability or medical condition. If the GRHC receives a verification document that provides such information, the GRHC will not place this information in the tenant file. Under no circumstances will the GRHC request a participant’s medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services’ website at <http://www.hhs.gov/ocr/privacy/>.

The above cited regulation does not prohibit the following inquiries, provided these inquiries are made of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant’s ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

### Family Members Receiving SSA Disability Benefits

Verification of the receipt of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences (if applicable) or certain income disallowances and deductions [VG, p. 23].

For family members claiming disability who receive disability benefits from the SSA, the GRHC 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 GRHC will request a current (dated within the last 60 calendar days) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the GRHC 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 GRHC.

## **Family Members Not Receiving SSA Disability Benefits**

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403.

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.-

## **7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]**

### **OVERVIEW**

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. A detailed discussion of eligibility requirements is in the Eligibility chapter. This verifications chapter discusses HUD and GRHC verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy. [24 CFR 5.508(g)(5)]

### **U.S. Citizens and Nationals**

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

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

### **Eligible Immigrants**

#### ***Documents Required***

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

#### ***GRHC Verification*** [HCV GB, pp. 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the GRHC will verify immigration status with the United States Citizenship and Immigration Services (USCIS). The GRHC will follow all USCIS protocols for verification of eligible immigration status.

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

The GRHC will verify any preferences claimed by an applicant that determined placement on the waiting list.

## PART III: VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides GRHC policies that supplement the general verification procedures specified in Part I of this chapter.

### 7-III.A. EARNED INCOME

Unless tip income is included in a family member's W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

#### Wages

When the GRHC requires third-party verification of wages, ~~F~~for wages other than tips, the family must provide two most current (~~wit~~within 60 calendar days), consecutive pay stubs.

### 7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

The GRHC will obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.

Business owners and self-employed persons will be required to provide:

- Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.).
- ~~An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted, and the business owner or self-employed person must certify to its accuracy.~~
- ~~All schedules completed for filing federal and local taxes in the preceding year.~~
- If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

For self-employed individuals who claim they do not to file tax returns, The GRHC will obtain a completed copy of IRS Form 4506-T to verify that no return has been filed.

For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the GRHC will provide a format for the individual to declare their income and expenses. The GRHC will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the GRHC may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the GRHC will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the GRHC will require the family to provide documentation of income and expenses for this period and use that information to project income.

### **7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS**

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

#### **Social Security/SSI Benefits [\[Notice PIH 2023-27\]](#)**

Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants.

For applicants, since EIV does not contain SS or SSI benefit information, the GRHC will ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the last 120 calendar days) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the GRHC will help the applicant request a benefit verification letter from SSA's website at [www.ssa.gov](http://www.ssa.gov) or ask the family to request one by calling SSA at 1-800-772-1213. The GRHC will obtain the original benefit letter from the applicant, make a photocopy of the document for the file, and return the original to the family.

For participants, the GRHC will obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct.

- If the participant agrees with the amount reported in EIV, the GRHC will use the EIV-reported gross benefit amount to calculate annual income from Social Security. The GRHC is required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as \$450.80 and EIV displays the amount as \$450.00. The GRHC will use the EIV-reported amount unless the participant disputes the amount.
- If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the GRHC will request a current SSA benefit verification letter (dated within the last 120 calendar days) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the GRHC should help the participant request a benefit verification letter from SSA's website at [www.ssa.gov](http://www.ssa.gov) or ask the family to request one by calling SSA at 1-800-772-1213. The GRHC will obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family.

Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits.



~~TO VERIFY THE SS/SSI BENEFITS OF APPLICANTS, THE GRHC WILL REQUEST A CURRENT YEAR SSA BENEFIT VERIFICATION LETTER FROM EACH FAMILY MEMBER THAT RECEIVES SOCIAL SECURITY BENEFITS. IF THE FAMILY IS UNABLE TO PROVIDE THE DOCUMENT(S), THE GRHC WILL HELP THE APPLICANT REQUEST A BENEFIT VERIFICATION LETTER FROM SSA'S WEB SITE AT WWW.SSA.GOV OR ASK THE FAMILY TO REQUEST ONE BY CALLING SSA AT 1-800-772-1213. ONCE THE APPLICANT HAS RECEIVED THE BENEFIT VERIFICATION LETTER THEY WILL BE REQUIRED TO PROVIDE IT TO THE GRHC.~~

~~TO VERIFY THE SS/SSI BENEFITS OF PARTICIPANTS, THE GRHC WILL OBTAIN INFORMATION ABOUT SOCIAL SECURITY/SSI BENEFITS THROUGH THE HUD-EIV SYSTEM, AND CONFIRM WITH THE PARTICIPANT(S) THAT THE CURRENT LISTED BENEFIT AMOUNT IS CORRECT. IF THE PARTICIPANT DISPUTES THE EIV REPORTED BENEFIT AMOUNT, OR IF BENEFIT INFORMATION IS NOT AVAILABLE IN HUD SYSTEMS, THE GRHC WILL REQUEST A CURRENT SSA BENEFIT VERIFICATION LETTER FROM EACH FAMILY MEMBER THAT RECEIVES SOCIAL SECURITY BENEFITS. IF THE FAMILY IS UNABLE TO PROVIDE THE DOCUMENT(S) THE GRHC WILL HELP THE PARTICIPANT REQUEST A BENEFIT VERIFICATION LETTER FROM SSA'S WEB SITE AT WWW.SSA.GOV OR ASK THE FAMILY TO REQUEST ONE BY CALLING SSA AT 1-800-772-1213. ONCE THE PARTICIPANT HAS RECEIVED THE BENEFIT VERIFICATION LETTER THEY WILL BE REQUIRED TO PROVIDE IT TO THE GRHC.~~

#### **7-III.D. ALIMONY OR CHILD SUPPORT [Notice PIH 2023-27]**

Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family’s child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family.

The methods the GRHC will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be obtained in the following order of priority:

- Copies of the receipts and/or payment stubs for the 12 months ~~60 calendar days~~ prior to GRHC request
- Third-party verification form from the state or local child support enforcement agency
- Third-party verification form from the person paying the support
- Family's self-certification of amount received

If the family declares that it *receives irregular or no payments*, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

- A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts
- If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

**Note:** Families are not required to undertake independent enforcement action.

### **7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]**

Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income. The GRHC will accept self-certification from the family stating that income will not be repeated in the coming year. However, the GRHC may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.

### **7-III.FE. ASSETS AND INCOME FROM ASSETS**

#### **Net Family Assets [24 CFR 5.603]**

For families with net assets totaling \$50,000 or less, the GRHC will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The GRHC reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, in determining the value of checking or savings accounts, the GRHC will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the GRHC will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero.

#### **Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2)]**

Both at admission and reexam, the GRHC will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and must be signed by all family members 18 years of age and older. The GRHC reserves the right to require additional verification in situations where the accuracy of the declaration is in question.

If the family declares they have a present ownership in real property, the GRHC will obtain third-party verification of the following factors: whether the family has the legal right to reside in

the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the GRHC will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

### Assets Disposed of for Less than Fair Market Value 7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The GRHC needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28]. The GRHC will verify the value of assets disposed of only if:

- The GRHC does not already have a reasonable estimation of its value from previously collected information, or
- The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly participant reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

### 7-III.HF. NET INCOME FROM RENTAL PROPERTY

The family must provide:

- A current executed lease for the property that shows the rental amount or certification from the current tenant.
- A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).
- If schedule E was not prepared, the GRHC will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

### 7-III.I. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS [Notice PIH 2023-27]

The GRHC is not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are equal to or below \$50,000 (adjusted annually for inflation), even in years when full verification of assets is required or if the GRHC does not

accept self-certification of assets. The GRHC must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than \$50,000.

### 7-III.G. RETIREMENT ACCOUNTS

~~The GRHC will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.~~

~~The type of original document that will be accepted depends upon the family member's retirement status.~~

~~• *Before* retirement, the GRHC will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case later than 60 calendar days from the GRHC request.~~

~~• *Upon* retirement, the GRHC will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.~~

~~*After* retirement, the GRHC will accept an original document from the entity holding the account dated no but in no case later than 60 calendar days from the GRHC request.~~

The GRHC will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken, and any regular payments.

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### 7-III.KH. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to document why third-party verification is not available, or report the income on the 50058. Fully excluded income is defined as income where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD (for example, food stamps, earned income of a minor, or foster care funds).

~~For fully excluded income, the GRHC is **not** required to follow the verification hierarchy, document why third-party verification is not available, or report the income on the 50058. Fully excluded income is defined as income that is entirely excluded from the annual income determination (for example, food stamps, earned income of a minor, or foster care funds) [Notice PIH 2013-04].~~

The GRHC will accept the family's self-certification as verification of fully excluded income. The GRHC may request additional documentation if necessary to document the income source.

For partially excluded income, the GRHC is required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student, ~~or income excluded under the earned income disallowance~~).

The GRHC will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

### **7-III.I. ZERO ~~ANNUAL~~ INCOME STATUS REVIEWS [Notice PIH 2023-27]**

A zero income review is an assessment, sometimes periodic, performed by the GRHC of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR § 5.609(b)(24)(vi)]. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.

If the family has reported zero income, the GRHC will conduct an interim reexamination every 3 months if the family continues to report that they have no income.

### **7-III.~~H~~J. STUDENT FINANCIAL ASSISTANCE [Notice PIH 2015-21]**

Any financial assistance, in excess of amounts received for tuition, fees, and other required charges that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance [24 CFR 5.609(b)(9) and FR 4/10/06].

For students over the age of 23 with dependent children or students residing with parents who are seeking or receiving HCV assistance, the full amount of student financial assistance is excluded from annual income [24 CFR 5.609(c)(6)]. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education (as defined in Exhibit 3-2). Excluded amounts are verified only if, without verification, the GRHC would not be able to determine whether or to what extent the income is to be excluded (see section 7-III.H).

For a student subject to having a portion of his/her student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9), the GRHC will request written third-party verification of both the source and the amount. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, the GRHC will request written verification of the student's tuition, fees, and other required charges.

If the GRHC is unable to obtain third-party written verification of the requested information, the GRHC will pursue other forms of verification following the verification hierarchy in section 7-I.B.

### **7-III.K. PARENTAL INCOME OF STUDENTS SUBJECT TO ELIGIBILITY RESTRICTIONS**

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from his or her parents or a *vulnerable youth* in accordance with [PHA-GRHC](#) policy [24 CFR 5.612, FR Notice 4/10/06, p. 18146, and FR Notice 9/21/16].

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

If the GRHC is required to determine the income eligibility of a student's parents, the GRHC will request an income declaration and certification of income from the appropriate parent(s) (as determined in section 3-II.E). The GRHC will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the GRHC. The required information must be submitted (~~postmarked~~) within 15 calendar days of the date of the GRHC's request or within any extended timeframe approved by the GRHC.

The GRHC reserves the right to request and review supporting documentation at any time if it questions the declaration or certification. Supporting documentation may include, but is not limited to, Internal Revenue Service (IRS) tax returns, consecutive and original pay stubs, bank statements, pension benefit statements, benefit award letters, and other official and authentic documents from a federal, state, or local agency.

## **PART IV: VERIFYING MANDATORY DEDUCTIONS**

### **7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS**

The dependent and elderly/disabled family deductions require only that the GRHC verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

#### **Dependent Deduction**

See Chapter 6 (6-II.B.) for a full discussion of this deduction. The GRHC will verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or cohead of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

#### **Elderly/Disabled Family Deduction**

See Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The GRHC will verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

### **7-IV.B. MEDICAL EXPENSE DEDUCTION**

Policies related to medical expenses are found in 6-II.D. The amount of the deduction will be verified following the standard verification procedures described in Part I.

#### **Amount of Expense**

Medical expenses will be verified through:

- Written third-party documents provided by the family, such as pharmacy printouts or receipts.
- The GRHC will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The GRHC will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.
- Written third-party verification forms if the family is unable to provide acceptable documentation.
- If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

In addition, the GRHC will verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified medical expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

## **Eligible Household**

The medical expense deduction is permitted only for households in which the head, spouse, or cohead is at least 62, or a person with disabilities. The GRHC will verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter and as described in Chapter 7 (7-IV.A.) of this plan.

## **Qualified Expenses**

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the GRHC's policy on what counts as a medical expense.

## **Unreimbursed Expenses**

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

## **Expenses Incurred in Past Years**

When anticipated costs are related to on-going payment of medical bills incurred in past years, the GRHC will verify:

- The anticipated repayment schedule,
- The amounts paid in the past, and
- Whether the amounts to be repaid have been deducted from the family's annual income in past years

## **7-IV.C. DISABILITY ASSISTANCE EXPENSES**

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

### **Amount of Expense**

#### ***Attendant Care***

~~The GRHC will accept written third party documents provided by the family.~~

~~If family provided documents are not available, the GRHC will provide a third party verification form directly to the care provider requesting the needed information.~~

Expenses for attendant care will be verified through:

- Written third-party documents provided by the family, such as receipts or cancelled checks.
- Third-party verification form signed by the provider, if family-provided documents are not available.
- If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.



## ***Auxiliary Apparatus***

Expenses for auxiliary apparatus will be verified through:

- Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.
- Third-party verification form signed by the provider, if family-provided documents are not available.
- If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the GRHC will verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

### **Family Member is a Person with Disabilities**

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The GRHC will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

### **Family Member(s) Permitted to Work**

The GRHC will verify that the expenses claimed enable a family member, or members, (including the person with disabilities) to work.

The GRHC will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

### **Unreimbursed Expenses**

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source. The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

## **7-IV.D. CHILD CARE EXPENSES**

Policies related to child care expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I of this chapter. In addition, the GRHC will verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of child care.
- The costs are reasonable.

### **Eligible Child**

To be eligible for the child care deduction, the costs must be incurred for the care of a child under the age of 13. The GRHC will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

### **Unreimbursed Expense**

To be eligible for the child care deduction, the costs must not be reimbursed by another source. The family (and the care provider) will be required to certify that the child care expenses are not paid or reimbursed to the family from any source.

### **Pursuing an Eligible Activity**

The GRHC will verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

#### *Information to be Gathered*

The GRHC will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

#### *Seeking Work*

Whenever possible the GRHC will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the GRHC will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the GRHC any reports provided to the other agency.

In the event third-party verification is not available, the GRHC will provide the family with a form on which the family member must record job search efforts. The GRHC will review this information at each subsequent reexamination for which this deduction is claimed.

#### *Furthering Education*

The GRHC will request third-party documentation to verify that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

#### *Gainful Employment*

The GRHC will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

#### **Allowable Type of Child Care**

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

The GRHC will verify that the type of child care selected by the family is allowable, as described in Chapter 6 (6-II.F).

The GRHC will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorated costs if some of the care is provided for ineligible family members).

The GRHC will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

#### **Reasonableness of Expenses**

Only reasonable child care costs can be deducted.

~~The actual costs the family incurs will be compared with the GRHC's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable. The GRHC will accept the actual cost billed for the expense.~~

~~If the family presents a justification for costs that exceed typical costs in the area, the GRHC will request additional documentation, as required, to support a determination that the higher cost is appropriate.~~

**EXHIBIT 7-1: SUMMARY OF DOCUMENTATION REQUIREMENTS  
FOR NONCITIZENS [HCV GB, pp. 5-9 and 5-10]**

- All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

**Elderly Noncitizens**

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

**All other Noncitizens**

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

- Form I-551 Alien Registration Receipt Card (for permanent resident aliens)
- Form I-94 Arrival-Departure Record annotated with one of the following:
  - “Admitted as a Refugee Pursuant to Section 207”
  - “Section 208” or “Asylum”
  - “Section 243(h)” or “Deportation stayed by Attorney General”
  - “Paroled Pursuant to Section 221 (d)(5) of the USCIS”

- Form I-94 Arrival-Departure Record with no annotation accompanied by:
  - A final court decision granting asylum (but only if no appeal is taken);
  - A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90);
  - A court decision granting withholding of deportation; or
  - A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).

- Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”.

- Form I-688B Employment Authorization Card annotated “Provision of Law 274a.12(11)” or “Provision of Law 274a.12”.

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*