

## **HUD Guidelines for Projecting Annual Income When Upfront Income Verification (UIV) Data is Available**

The following guidelines are provided to assist PHAs in consistently and uniformly resolving income discrepancies.

HUD has established the criteria for what constitutes a *substantial difference* in cases where UIV income data differs from tenant-provided and/or other verified income information. HUD defines a *substantial difference* as one that is \$200 or more per month .

### **UIV Income Data is Not Substantially Different than Tenant-Provided Income Information**

UIV may alleviate the need for 3<sup>rd</sup> party verifications when there is not a substantial difference between UIV and tenant-reported income.

In cases where UIV income data is **not** substantially different than tenant-reported income, PHAs should follow guidelines below:

- If UIV income data is less than **current** tenant-provided documentation, the PHA will use tenant-provided documents to calculate anticipated annual income.
- If UIV income data is more than **current** tenant-provided documentation, the PHA will use UIV income data to calculate anticipated annual income **unless** the tenant provides the PHA with documentation of a change in circumstances (i.e. change in employment, reduction in hours, etc.). Upon receipt of acceptable tenant-provided documentation of a change in circumstances, the PHA will use tenant-provided documents to calculate anticipated annual income.

### **UIV Income Data is Substantially Different than Tenant-Provided Income Information**

In cases where UIV income data is substantially different than tenant-reported income, PHAs shall follow the guidelines below:

- The PHA shall request written third party verification from the discrepant income source, in accordance with 24 CFR 5.236(3)(i).
- The PHA should review historical income data for patterns of employment, paid benefits, and/or receipt of other income, when the PHA can not readily anticipate income, such as in cases of seasonal employment, unstable working hours, and suspected fraud.
- The PHA must analyze all data (UIV data, third party verification and other documents/information provided by the family) and attempt to resolve the income discrepancy.
- The PHA will use the most current verified income data (and historical income data if appropriate) to calculate anticipated annual income.

**Comments:**

HUD recommends that tenant-provided documents should be dated within the last 60 days of the PHA interview date.

If the PHA is unable to anticipate annual income using current information due to historical fluctuations in income, the PHA may average amounts received/earned to anticipate annual income.

Note that if the tenant disputes UIV Social Security (SS)/ Supplemental Security Income (SSI) benefit data, the PHA should request the tenant to provide the PHA with a current, original Social Security Administration (SSA) notice or benefit letter within 10 business days of the PHA interview date. The tenant may contact SSA at 1-(800) 772-1213 or visit their local SSA office.

**Resources for Historical Income Data:**

- Social Security Earnings Statement (summary of gross earnings for each year that the participant has worked in his/her lifetime) may be obtained from the Social Security Administration. Request for this document may be done via mail or online at [www.ssa.gov](http://www.ssa.gov)
- Two years of earnings may be obtained from the UIV System or local State Wage Information Collection Agency (SWICA). This information is not available to PHAs in States that the local SWICA has entered into an agreement with HUD to obtain wage and unemployment compensation data.
- Last eight (8) amounts of Social Security benefits paid to a participant (or household member) may be obtained from the TASS or UIV system.