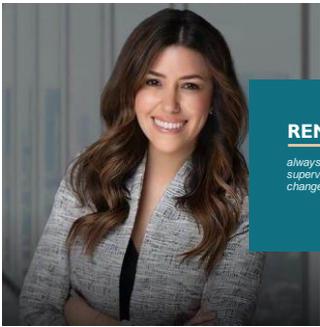




INS AND OUTS/ DOS AND DON'TS OF CERTIFICATIONS
Sheyla Batres



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REMEMBER
always follow the guidance of your compliance and supervisory departments prior to implementing any changes to your processes.

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OBJECTIVES
Hone interviewing skills to maximize the efficiency and productivity of certification processing.

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Why do we have to do ALL this paperwork?

Regulation states that a determination of annual income of individuals must be done **PRIOR** to move-in.
Households must qualify for ALL programs.

SUCCESS

5

What is the purpose of the applicant interview?

The most important contributions to the correct determination of eligibility, rent and subsidy are:

A photograph of a young woman with dark curly hair, wearing a plaid shirt, smiling and shaking hands with another person whose hand is visible. They are sitting at a desk with a laptop and papers.

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- ✓ Correct information provided by the family
- ✓ Effective owner verification and interpretation of the information provided
- ✓ Correct application of HUD regulations and policies by the owner/Agent

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WHY ME??

- How can I possibly get this done?
- Tenants and applicants LIE?
- They do not cooperate!!
- They don't respond!!
- I am soooooo tired!!

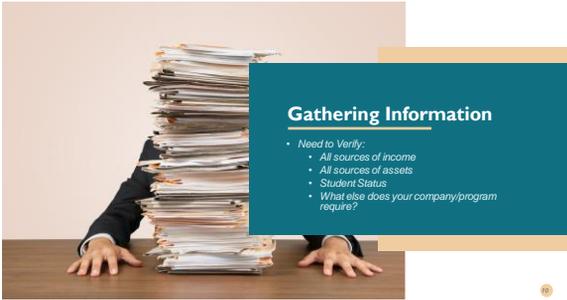
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What is your role?



Manager Owner Key employee

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Gathering Information

- **Need to Verify:**
 - All sources of income
 - All sources of assets
 - Student Status
 - What else does your company/program require?

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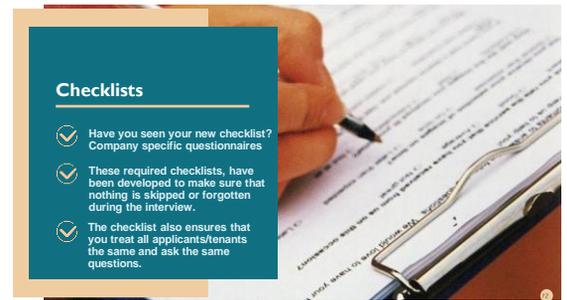


Tips on a Successful Interview

- Communicate the process to the applicant(s)/tenants
 - Clearly explain the process (provide complete and accurate information at each transition) for most applicants the process is new and sometimes overwhelming
 - Explain how the process works and how long it may take.
 - Be specific on what is needed from the applicant (recommend having the items needed listed in writing)
 - Assure them that their information will be handled in a secure and confidential manner.

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Checklists

- ✓ Have you seen your new checklist? Company specific questionnaires
- ✓ These required checklists, have been developed to make sure that nothing is skipped or forgotten during the interview.
- ✓ The checklist also ensures that you treat all applicants/tenants the same and ask the same questions.

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Interview Checklist

- ✓ Use as a tool or road map
- ✓ Have list of documents required for all programs.
- ✓ Have list of any questions or topics that may need to be covered
 - > Smoke free property?
 - > Any pets?
 - > Any live-in Aide or accommodations?

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Before Interview

- **Be Prepared! Save your time and the applicant's time.**
 - Use application or master file for tenants to prepare for the interview (forms and verifications for all income and asset sources).
- Prepare any require documents for each program

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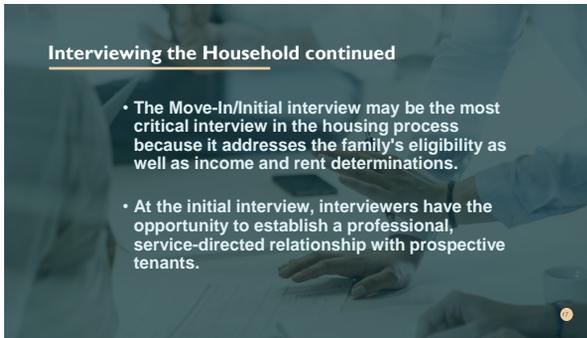
Before Interview continued

- **Review the application or questionnaire**
 - Any blanks, these will need to be addressed during the interview. Blanks are assumed as a "yes" or a question never asked.
 - Any questions that were not answered completely or clearly
 - Change or expected change in household composition
 - Expected changes to income
 - Need of an accessible unit or accommodation

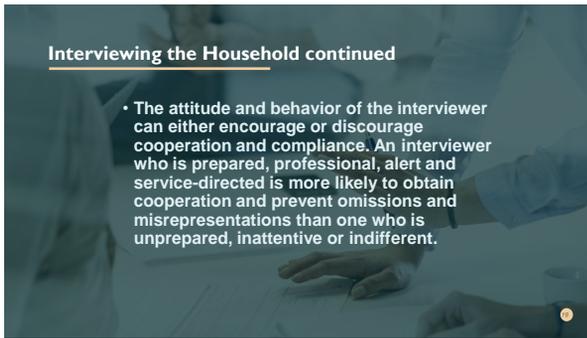
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Interviewing the Household continued

- Explain the property programs to your applicant(s)/Tenant
- Go over any application questions/issues/blanks
- Collect backup income and asset information (applicant provided documents/information)
- Have applicant(s) sign verifications/required forms
- Create any additional verifications if needed (changes since application)

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Interviewing the Household continued

- Sign and date everything while the applicant/tenant is signing. It is too easy to forget to go back.
- Touch things as few times as possible.
- Credit Check? What is the policy?
- Criminal/Background Check? What is the policy?
- Two year residential history for Tax Credit

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Interviewing the Household continued

- Discuss timeframe (communicate)
- Schedule Home Visit? (If applicable at your property)
- Live-in aid, discuss policy and complete documentation

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Interviewing the Household continued

- Expected income change in the twelve months? Need to clarify or verify.
- Any questions answered incorrectly?
- Verify date of birth or social security number
- Any changes during interview, clarify any changes
- Disposed of any asset?

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Be the detective

- Review the Bank Statements
- These can be very valuable sources of information and show unreported income/assets.
 - Look for other accounts (transfers to and from other accounts)
 - Look for income that has not been reported, but is deposited on a regular basis

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Be the detective

- Look for large deposits or withdraws
- Are payments being made to a life insurance? Find out what type of life insurance it is.
- What else can bank statements tell you?
- Review credit checks

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Be the detective

- These can be very valuable sources of information and clues to some unreported assets/income.
- Look for real estate loans/mortgages
- Does the total monthly payments exceed reported income?
- Is employment listed on your credit report? What is listed? Does it match reported employer?

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Annual Recertification Interview

What is needed?

- We are required to complete an annual recertification for each tenant family.
- We have the advantage at an annual of having background information about the family from the previous year's certification.
- You should not assume that family circumstances or even family composition is the same as the last year.
- You should compare the new information provided by the family to information in the file.
- You should look for changes in family composition, income sources and amounts as well as dates of birth and social security numbers for all family members. A discrepancy may suggest additional questions that should be asked.

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Common Mistakes in Interviewing

- Not allowing enough time to interview properly
- Failing to establish rapport and ground rules before starting the "paperwork" that requires YOU to ask personal questions
- Communicating distrust; making snap judgments about people based upon superficial observations

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Common Mistakes in Interviewing continued

- Failing to listen for what may be behind a response
- Failing to control the interview process, not control the person
- Focusing on the paperwork and not the person

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Common Mistakes in Interviewing continued

- Giving personal opinions about the family's circumstances
- Trying to be tricky: there is no need to try to trap or trick a person into a false statement. If you are asking the right questions in a professional way, conflicting statements will be apparent.
- Communicating disapproval of a persons situation or lifestyle
- Failure to make appropriate file notations about information that may be material to the application

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Verification Hierarchy

Upfront Income Verification (UIV)	Upfront Income Verification (UIV) using non-HUD system	Written third Party Verification
<ul style="list-style-type: none"> • using HUD's Enterprise Income Verification (EIV) system (not available for income verifications of applicants) 	<ul style="list-style-type: none"> • Optional 	<ul style="list-style-type: none"> • Mandatory to supplement EIV-reported income sources and when EIV has no data; Mandatory for non-EIV reported income sources; Mandatory when tenant disputes EIV-reported employment and income information and is unable to provide acceptable documentation to support disputes.)

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Verification Hierarchy

Written Third Party Verification Form	Oral Third-Party Verification	Tenant Declaration
<ul style="list-style-type: none"> Mandatory if written third party verification documents are not available or rejected by the PSA and when the applicant or tenant is unable to provide acceptable documentation 	<ul style="list-style-type: none"> Mandatory if written third party verification is not available 	<ul style="list-style-type: none"> Use as a last resort when unable to obtain any type of third-party verification

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Annual Recertification Interview

EIV – Section 8 vs. Tax Credit

Section 8	Tax Credit
<ul style="list-style-type: none"> Must use EIV (Not available at move-in) 	<ul style="list-style-type: none"> Never ever, ever, ever, ever can use EIV.

When can you use EIV for Tax Credit?

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Verification Hierarchy

Important for Tenant Provided Documents! (4350.3, 5-13)

- Is the document current?
- Is the documentation complete?
- Is the document an unaltered original? Photocopied documents generally cannot be assumed to be reliable.

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Wages

Section 8 vs. Tax Credit

<p>Section 8</p> <ul style="list-style-type: none"> When using pay stubs to document employment income the applicant or tenant must provide the most recent four to six consecutive pay stubs (actual paycheck not acceptable – does not show gross). 	<p>Tax Credit</p> <ul style="list-style-type: none"> Must use most recent consecutive three months pay stubs for CA and 4-6 stubs for most states Must complete all four calculations at Move-in and use highest calculation
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Social Security Verification

Section 8 vs. Tax Credit

<p>Section 8</p> <ul style="list-style-type: none"> Using EIV – Social Security (4350.3, 5-5) If the tenant agrees with the Social Security benefit information on the EIV Income Report, use the EIV Income Report as third party verification and also for calculating the tenant's annual income. 	<p>Tax Credit</p> <ul style="list-style-type: none"> State Agencies prefer 3rd Party Verification directly from the source. However, they will also accept the current year's Social Security Award letter in lieu of 3rd party documentation for regular Social Security and the most current verification letter for Supplemental Security income.
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Verbal Verification

Section 8 vs. Tax Credit

<p>Section 8</p> <ul style="list-style-type: none"> When verifying information over the telephone, it is important to be certain that the person on the telephone is the party he or she claims to be. Generally, it is best to telephone the verification source rather than to accept verification from a source calling the property management office. Oral verification must be documented in the file. 	<p>Tax Credit</p> <ul style="list-style-type: none"> Verbal verifications are not acceptable in Tax Credit. Verbal telephone clarification of existing documentation acceptable for minor issues relating to dates or blanks. If verbal clarification would reduce the income calculation, third party clarification must be obtained.
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Clarifying vs. Clarification

- During the certification process, it may become necessary to clarify information. This is not the same as creating a clarification of a verification.
- Clarifying is asking about something that came up on the credit/background check such as real estate, or employment. Then either creating a verification or having the applicant create a self-affidavit explaining the situation.

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Clarifying vs. Clarification

- A Clarification is a form created during the verification process to explain something that happened during the verification process. Common examples:
 1. To detail the answer from the third party regarding a blank on the verification.
 2. To explain why statements (review of documents) were used instead of a third party verification.

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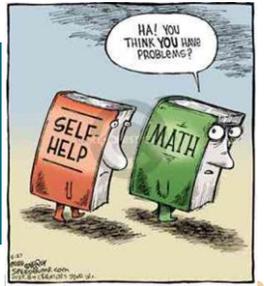
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THANK YOU!

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