

# FERNDALE HOUSING COMMISSION

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## UIV/EIV Security Policy

### Policy

The Ferndale Housing Commission (FHC) will utilize Upfront Income Verification (UIV) as the Commission's preferred method of verifying income. UIV refers to the FHC's use of verification tools available from independent sources that maintain computerized information about earning and benefits, including HUD's Eligibility Income Verification (EIV) system. The procedures listed in this document are designed to supplement the HUD Security Procedures. All UIV system and related documents will only be used the purposes for which they were intended. The data is subject to the provisions of the Federal Privacy Act (5 U.S.C. § 552, As Amended by Public Law No. 104-231, 110 Stat. 3048), The Freedom of Information Act (5 U.S.C. § 552, As Amended By Public Law No. 104-231, 110 Stat. 3048), and related amendments.

In order to provide for proper security for data received through the UIV systems, the following procedures are hereby established.

### Procedures

#### ***Authorized Users***

1. EIV users shall be authorized by the Executive Director on a need-to-know basis. Persons not employed by the FHC shall not be authorized, and only those whose job duties specifically relate to UIV shall be granted access to the systems and related documents.
2. Only the following types of authorized users shall be allowed access to the UIV/EIV system by the Executive Director:
  - a. Persons whose job duties include the determination of rental payment charges
  - b. Persons whose job duties include securing data obtained under UIV/EIV.
  - c. Persons whose job duties include retrieving UIV/EIV data
  - d. Persons whose job duties include reviewing UIV/EIV data for the purposes of performing UPCS and/or HQS inspections
3. The Executive Director will provide each user a User Access Form, and the user shall apply for a User ID and password as applicable. The Commission's *Acceptable Computer Use Policy*, contains provisions specifically prohibiting sharing of User ID and Password data between users and is therefore hereby incorporated into this document by reference.

#### ***Executive Director's Responsibilities***

1. The Executive Director shall serve as the UIV/EIV Security Officer.

2. The Executive Director shall authorize users for access to EIV systems and data only where necessary. The Executive Director shall update this log on a periodic basis, at least once per calendar quarter. This will be accomplished by certifying the user's status through HUD's annual certification process. In an effort to protect the privacy of the individual users and their password/access IDs, the certification log will not be printed in hard copy.
3. The Executive Director shall conduct staff training and/or review of UIV/EIV security procedures at the time access is granted on a periodic basis.
4. The authorized staff shall be responsible for determining and reporting to the Executive Director any instances of improper disclosure of UIV/EIV data and/or unauthorized access of UIV/EIV computerized systems.
  - a. Upon noting a security breach, the Executive Director shall immediately contact appropriate HUD personnel for removal of the offending parties from the EIV system.
5. The Executive Director shall monitor UIV/EIV procedures to ensure ongoing compliance. Procedures will be updated as needed.

***Disclosure, Data Security and Disposition***

1. Staff shall document that the FHC will make use of UIV/EIV systems at each annual recertification and to applicants during the application process. This disclosure shall include the following:
  - a. A brief explanation of the UIV/EIV system
  - b. A brief explanation of how income discrepancies are identified, the potential effect on rental calculations, and penalties for committing fraud
  - c. A brief explanation of how discrepancies are resolved
  - d. A brief explanation of the actions the FHC may take based on verified unreported or underreported income.
2. Each tenant and applicant file shall contain a properly completed, active HUD 9886 Form or equivalent, granting the FHC access to UIV/EIV data.
3. UIV/EIV data shall be kept in (a) locked, fire-resistant fire filing cabinet(s), and only those staff members who have been previously authorized by the Executive Director may be given keys and/or access to the data. The Executive Director shall maintain a list of users receiving keys. The filing cabinet(s) shall in turn be secured behind a door locked whenever the office is closed.
4. Proper disposition of UIV/EIV data shall be performed by cross-shredding.

Date Approved: \_\_\_\_\_

Motion #: \_\_\_\_\_