

Meeting Date: **August 23, 2010**

Agenda Item: **Approval of the Certification and Submission of the Section 8 Management Assessment Program (SEMAP) and the Enterprise Income Verification (EIV) Policies and Procedures to the United States Department of Housing and Urban Development (HUD).**

ATTACHMENTS

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Culver City Housing Agency Indicator Scoring:

Indicator 1: Selection from the Waitlist- The CCHA has written policies in its administrative plan for selecting applicants from the waiting list and therefore is in full compliance for this indicator.

Indicator 2: Reasonable Rent - As required by HUD, all Section 8 HCV Program files must contain information pertaining to comparable rents of each leased unit. Of the files evaluated, each contained rent reasonableness information and resulted in a score of 100%.

Indicator 3 – Determination of Adjusted Income – This evaluation resulted in a one-hundred (100%) performance rating. This high score in calculating adjusted income and calculating correct program participant rent is directly related to the creation of an internal Rent Calculation Audit Worksheet for each file managed by the housing staff. Additionally, the Housing Specialist, who oversees the daily management of the Section 8 HCV Program, conducts a quality control review of each file upon completion.

Indicator 4- Utility Allowance Schedule- The CCHA maintains an up-to-date utility allowance schedule. The CCHA has reviewed the utility rate that were obtained within the last 12 months, and adjusted the utility allowance schedule if there was a change of 10% or more in a utility rate since the last time the utility allowance was revised.

Indicator 5 – Housing Quality Standard (HQS) Control Inspections – The CCHA remains in full compliance in FY 2009/2010 in terms of performing and subsequently auditing annual inspections. The Structural Rehabilitation Specialist and Housing Administrator re-inspected the units randomly selected for the SEMAP evaluation to ensure HQS compliance. The result was a one hundred percent (100%) performance rating.

Indicator 6- HQS Enforcement- The CCHA has not failed any units for 2009-2010 that required action within 24 hours due to health and safety violations and therefore did not have a quality control sample for this indicator. The result was a one hundred percent (100%) performance rating.

Indicator 7 – Expanding Housing Opportunities - The CCHA strategy to encourage owner participation was implemented by the CCHA's increased efforts to enhance property owner outreach. A strong relationship with property owners is essential to maintaining existing and attracting greater property owner participation which results in expanded housing opportunities. The activities created to maintain and attract property owners to participate in the Section 8

HCV Program include small gestures like giving hand-written "thank you" notes and making direct telephone calls to express CCHA gratitude to property owners who participate in the Section 8 HCV Program. To maintain excellent customer service, staff responds to owner and participants telephone calls within twenty-four (24) hours. Inspections for new lease-ups or rent increases are also scheduled either the same day or within twenty-four (24) to forty-eight (48) hours.

CCHA staff continues to seek out new strategies to improve owner participation. Some of these new strategies include:

- Hosting a "Housing Authority Management Association" (HAMA) on May 27, 2010 where local Housing Authorities met and discussed different program policies and procedures within the Industry.
- Hosting "The Art ofAffordable Housing" on June 17, 2009 where local developers and housing advocates met to help educate the public on affordable housing.
- Creating the HQS Grant which allows qualified owners with failed properties to participate in a \$500.00 reimbursement towards the improvement of their property.
- Informing property owners of our Neighborhood Preservation Program (NPP) which provides grants to address deferred maintenance.
- Hosting an annual owner appreciation dinner.
- Presenting an award for "best owner of the year" through an essay contest among Section 8 HCVP Program participants.

Our strategies to encourage property owners to continue participation in the Section 8 HCV Program resulted in a 100% score for this Indicator.

Indicator 8- Payment Standards- This evaluation resulted in a one hundred percent (100%) performance rating as the CCHA has adopted current payment standards for the voucher program by unit size. As an example, the payment standard for a two (2) bedroom is \$1,497.00.

Indicator 9-Timely Annual Reexaminations- This evaluation resulted in a one hundred percent (100%) performance rating as the CCHA has completed a reexamination to determine income eligibility and affordable rent payments for each participating family at least every 12 months.

Indicator 10 – Correct Tenant Rent Calculations – Compliance is at one hundred percent (100%). To assure continued one hundred percent (100%)

compliance in this area, staff will be given ongoing training to stay abreast of any changes in HUD rules and regulations in this area.

Indicators 11 and 12 – Pre contract HQS Inspections and Annual HQS Inspections – One hundred percent (100%) of all units newly leased passed the HQS inspection before the execution of a lease and Housing Assistance Payment (HAP) contract. Additionally, one hundred percent (100%) of all units undergo an annual inspection. Housing staff also guarantees that initial inspections will be scheduled within forty-eight (48) hours.

Indicator 13 – Lease-Up – The CCHA continues to be challenged in this area. The CCHA continues to strive towards improving the current lease up rate. It is anticipated that with the downturn in the economy, more landlords will contact the CCHA to list their unit and make it available to qualified program participants that have received a Section 8 HCV Program Voucher.

Indicator 14-Family Self Sufficiency (FSS) - Since 1999 the CCHA has been awarded approximately \$521,900 to assist Section 8 HCVP participants achieve their goal of self sufficiency. In April, 2010 the CCHA received notification from HUD that it has received funding in the amount of \$65,558 to continue FSS Coordinator services that will be provided by Saint Joseph's Center. On June 28, 2010 the City Council approved a contract with St. Joseph's Center to provide case management, needs assessment, job development services and supportive service referrals for the FSS participants. Over the past year participation in the FSS Program has increased and the FSS Coordinator continues to provide these services. A total of forty-five (45) households have participated in FSS. Of this number, fourteen (14) have graduated. There are currently nineteen (19) households enrolled in the program.

Section 8 Management Assessment Program (SEMAP) Certification

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

OMB Approval No. 2577-0215 (exp. 1/31/2010)

ATTACHMENT 2

Public reporting burden for this collection of information is estimated to average 12 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and you are not required to respond to, a collection of information unless it displays a currently valid OMB control number.

This collection of information is required by 24 CFR sec 985.101 which requires a Public Housing Agency (PHA) administering a Section 8 tenant-based assistance program to submit an annual SEMAP Certification within 60 days after the end of its fiscal year. The information from the PHA concerns the performance of the PHA and provides assurance that there is no evidence of seriously deficient performance. HUD uses the information and other data to assess PHA management capabilities and deficiencies, and to assign an overall performance rating to the PHA. Responses are mandatory and the information collected does not lend itself to confidentiality.

Instructions Respond to this certification form using the PHA's actual data for the fiscal year just ended.

PHA Name	For PHA FY Ending (mm/dd/yyyy)	Submission Date (mm/dd/yyyy)
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Check here if the PHA expends less than \$300,000 a year in Federal awards ☐

Indicators 1 - 7 will not be rated if the PHA expends less than \$300,000 a year in Federal awards and its Section 8 programs are not audited for compliance with regulations by an independent auditor. A PHA that expends less than \$300,000 in Federal awards in a year must still complete the certification for these indicators.

Performance Indicators

1. Selection from the Waiting List. (24 CFR 982.54(d)(1) and 982.204(a))

(a) The PHA has written policies in its administrative plan for selecting applicants from the waiting list.

PHA Response Yes ☐ No ☐

(b) The PHA's quality control samples of applicants reaching the top of the waiting list and of admissions show that at least 98% of the families in the samples were selected from the waiting list for admission in accordance with the PHA's policies and met the selection criteria that determined their places on the waiting list and their order of selection.

PHA Response Yes ☐ No ☐

2. Reasonable Rent. (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)

(a) The PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units (i) at the time of initial leasing, (ii) before any increase in the rent to owner, and (iii) at the HAP contract anniversary if there is a 5 percent decrease in the published FMR in effect 60 days before the HAP contract anniversary. The PHA's method takes into consideration the location, size, type, quality, and age of the program unit and of similar unassisted units, and any amenities, housing services, maintenance or utilities provided by the owners.

PHA Response Yes ☐ No ☐

(b) The PHA's quality control sample of tenant files for which a determination of reasonable rent was required shows that the PHA followed its written method to determine reasonable rent and documented its determination that the rent to owner is reasonable as required for (check one):

PHA Response ☐ At least 98% of units sampled ☐ 80 to 97% of units sampled ☐ Less than 80% of units sampled

3. Determination of Adjusted Income. (24 CFR part 5, subpart F and 24 CFR 982.516)

The PHA's quality control sample of tenant files shows that at the time of admission and reexamination, the PHA properly obtained third party verification of adjusted income or documented why third party verification was not available; used the verified information in determining adjusted income; properly attributed allowances for expenses; and, where the family is responsible for utilities under the lease, the PHA used the appropriate utility allowances for the unit leased in determining the gross rent for (check one):

PHA Response ☐ At least 90% of files sampled ☐ 80 to 89% of files sampled ☐ Less than 80% of files sampled

4. Utility Allowance Schedule. (24 CFR 982.517)

The PHA maintains an up-to-date utility allowance schedule. The PHA reviewed utility rate data that it obtained within the last 12 months, and adjusted its utility allowance schedule if there has been a change of 10% or more in a utility rate since the last time the utility allowance schedule was revised.

PHA Response Yes ☐ No ☐

5. HQS Quality Control Inspections. (24 CFR 982.405(b))

A PHA supervisor (or other qualified person) reinspected a sample of units during the PHA fiscal year, which met the minimum sample size required by HUD (see 24 CFR 985.2), for quality control of HQS inspections. The PHA supervisor's reinspected sample was drawn from recently completed HQS inspections and represents a cross section of neighborhoods and the work of a cross section of inspectors.

PHA Response Yes ☐ No ☐

6. HQS Enforcement. (24 CFR 982.404)

The PHA's quality control sample of case files with failed HQS inspections shows that, for all cases sampled, any cited life-threatening HQS deficiencies were corrected within 24 hours from the inspection and, all other cited HQS deficiencies were corrected within no more than 30 calendar days from the inspection or any PHA-approved extension, or, if HQS deficiencies were not corrected within the required time frame, the PHA stopped housing assistance payments beginning no later than the first of the month following the correction period, or took prompt and vigorous action to enforce the family obligations for (check one):

PHA Response ☐ At least 98% of cases sampled ☐ Less than 98% of cases sampled

7. Expanding Housing Opportunities. (24 CFR 982.54(d)(5), 982.153(b)(3) and (b)(4), 982.301(a) and 983.301(b)(4) and (b)(12)).

ATTACHMENT 2

Applies only to PHAs with jurisdiction in metropolitan FMR areas.

Check here if not applicable ☐

(a) The PHA has a written policy to encourage participation by owners of units outside areas of poverty or minority concentration which clearly delineates areas in its jurisdiction that the PHA considers areas of poverty or minority concentration, and which includes actions the PHA will take to encourage owner participation.

PHA Response Yes ☐ No ☐

(b) The PHA has documentation that shows that it took actions indicated in its written policy to encourage participation by owners outside areas of poverty and minority concentration.

PHA Response Yes ☐ No ☐

(c) The PHA has prepared maps that show various areas, both within and neighboring its jurisdiction, with housing opportunities outside areas of poverty and minority concentration; the PHA has assembled information about job opportunities, schools and services in these areas; and the PHA uses the maps and related information when briefing voucher holders.

PHA Response Yes ☐ No ☐

(d) The PHA's information packet for voucher holders contains either a list of owners who are willing to lease, or properties available for lease, under the voucher program, or a list of other organizations that will help families find units and the list includes properties or organizations that operate outside areas of poverty or minority concentration.

PHA Response Yes ☐ No ☐

(e) The PHA's information packet includes an explanation of how portability works and includes a list of neighboring PHAs with the name, address and telephone number of a portability contact person at each.

PHA Response Yes ☐ No ☐

(f) The PHA has analyzed whether voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentration and, where such difficulties were found, the PHA has considered whether it is appropriate to seek approval of exception payment standard amounts in any part of its jurisdiction and has sought HUD approval when necessary.

PHA Response Yes ☐ No ☐

8. Payment Standards. The PHA has adopted current payment standards for the voucher program by unit size for each FMR area in the PHA jurisdiction and, if applicable, for each PHA-designated part of an FMR area, which do not exceed 110 percent of the current applicable FMR and which are not less than 90 percent of the current FMR (unless a lower percent is approved by HUD). (24 CFR 982.503)

PHA Response Yes ☐ No ☐

Enter current FMRs and payment standards (PS)

0-BR FMR _____	1-BR FMR _____	2-BR FMR _____	3-BR FMR _____	4-BR FMR _____
PS _____	PS _____	PS _____	PS _____	PS _____

If the PHA has jurisdiction in more than one FMR area, and/or if the PHA has established separate payment standards for a PHA-designated part of an FMR area, attach similar FMR and payment standard comparisons for each FMR area and designated area.

9. Annual Reexaminations. The PHA completes a reexamination for each participating family at least every 12 months. (24 CFR 982.516)

PHA Response Yes ☐ No ☐

10. Correct Tenant Rent Calculations. The PHA correctly calculates tenant rent in the rental certificate program and the family rent to owner in the rental voucher program. (24 CFR 982, Subpart K)

PHA Response Yes ☐ No ☐

11. Precontract HQS Inspections. Each newly leased unit passed HQS inspection before the beginning date of the assisted lease and HAP contract. (24 CFR 982.305)

PHA Response Yes ☐ No ☐

12. Annual HQS Inspections. The PHA inspects each unit under contract at least annually. (24 CFR 982.405(a))

PHA Response Yes ☐ No ☐

13. Lease-Up. The PHA executes assistance contracts on behalf of eligible families for the number of units that has been under budget for at least one year.

PHA Response Yes ☐ No ☐

- 14a. Family Self-Sufficiency Enrollment. The PHA has enrolled families in FSS as required. (24 CFR 984.105)

Applies only to PHAs required to administer an FSS program.

Check here if not applicable ☐

PHA Response

a. Number of mandatory FSS slots (Count units funded under the FY 1992 FSS incentive awards and in FY 1993 and later through 10/20/1998. Exclude units funded in connection with Section 8 and Section 23 project-based contract terminations; public housing demolition, disposition and replacement; HUD multifamily property sales; prepaid or terminated mortgages under section 236 or section 221(d)(3); and Section 8 renewal funding. Subtract the number of families that successfully completed their contracts on or after 10/21/1998.)

or, Number of mandatory FSS slots under HUD-approved exception

5

b. Number of FSS families currently enrolled

c. Portability: If you are the **initial** PHA, enter the number of families currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

Percent of FSS slots filled (b + c divided by a)

14b. Percent of FSS Participants with Escrow Account Balances. The PHA has made progress in supporting family self-sufficiency as measured by the percent of currently enrolled FSS families with escrow account balances. (24 CFR 984.305)

Applies only to PHAs required to administer an FSS program.

Check here if not applicable ☐

PHA Response Yes ☐ No ☐

Portability: If you are the **initial** PHA, enter the number of families with FSS escrow accounts currently enrolled in your FSS program, but who have moved under portability and whose Section 8 assistance is administered by another PHA

Deconcentration Bonus Indicator (Optional and only for PHAs with jurisdiction in metropolitan FMR areas).

The PHA is submitting with this certification data which show that:

- (1) Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA FY;
 - (2) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area during the last PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY;
- or**
- (3) The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's principal operating area over the last two PHA FYs is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the second to last PHA FY.

PHA Response Yes ☐ No ☐ **If yes, attach completed deconcentration bonus indicator addendum.**

I hereby certify that, to the best of my knowledge, the above responses under the Section 8 Management Assessment Program (SEMAP) are true and accurate for the PHA fiscal year indicated above. I also certify that, to my present knowledge, there is not evidence to indicate seriously deficient performance that casts doubt on the PHA's capacity to administer Section 8 rental assistance in accordance with Federal law and regulations.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Executive Director, signature

Chairperson, Board of Commissioners, signature

Date (mm/dd/yyyy) _____

Date (mm/dd/yyyy) _____

The PHA may include with its SEMAP certification any information bearing on the accuracy or completeness of the information used by the PHA in providing its certification.

SEMAP Certification - Addendum for Reporting Data for Deconcentration Indicator

Date (mm/dd/yyyy) _____

PHA Name _____

Principal Operating Area of PHA _____
(The geographic entity for which the Census tabulates data)

Special Instructions for State or regional PHAs. Complete a copy of this addendum for each metropolitan area or portion of a metropolitan area (i.e., principal operating areas) where the PHA has assisted 20 or more Section 8 families with children in the last completed PHA FY. HUD will rate the areas separately and the separate ratings will then be weighted by the number of assisted families with children in each area and averaged to determine bonus points.

1990 Census Poverty Rate of Principal Operating Area _____

Criteria to Obtain Deconcentration Indicator Bonus Points

To qualify for bonus points, a PHA must complete the requested information and answer yes for only one of the 3 criteria below. However, State and regional PHAs must always complete line 1) b for each metropolitan principal operating area.

- 1) _____ a. Number of Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY who live in low poverty census tracts. A low poverty census tract is a tract with a poverty rate at or below the overall poverty rate for the principal operating area of the PHA, or at or below 10% whichever is greater.
- _____ b. Total Section 8 families with children assisted by the PHA in its principal operating area at the end of the last PHA FY.
- _____ c. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last PHA FY (line a divided by line b).
- Is line c 50% or more? Yes ☐ No ☐

- 2) _____ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the last completed PHA FY.
- _____ b. Number of Section 8 families with children who moved to low poverty census tracts during the last completed PHA FY.
- _____ c. Number of Section 8 families with children who moved during the last completed PHA FY.
- _____ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts during the last PHA fiscal year (line b divided by line c).
- Is line d at least two percentage points higher than line a? Yes ☐ No ☐

- 3) _____ a. Percent of all Section 8 families with children residing in low poverty census tracts in the PHA's principal operating area at the end of the second to last completed PHA FY.
- _____ b. Number of Section 8 families with children who moved to low poverty census tracts during the last two completed PHA FYs.
- _____ c. Number of Section 8 families with children who moved during the last two completed PHA FYs.
- _____ d. Percent of all Section 8 mover families with children who moved to low poverty census tracts over the last two completed PHA FYs (line b divided by line c).
- Is line d at least two percentage points higher than line a? Yes ☐ No ☐

If one of the 3 criteria above is met, the PHA may be eligible for 5 bonus points.

See instructions above concerning bonus points for State and regional PHAs.

Enterprise Income Verification (EIV) Security Policy and Procedures

The Enterprise Income Verification System (EIV)

The EIV system is intended to provide a single source of income-related data to PHAs for use in verifying the income reported by participants in the various assisted housing programs. The Office of Public and Indian Housing (PIH) is responsible for administering and maintaining the EIV system.

A. Types of Upfront Verification of Income Provided by EIV

The EIV system compares the participant income data obtained from various sources including:

- o Participant-supplied income data captured on Form HUD-50058 and maintained in the PIC databases;
- o U.S. Department of Health and Human Services, National Directory of New Hires (NDNH) data. NDNH becomes the single source for wage, unemployment insurance benefit information, and the new hire (employment) information;
- o Social Security and Supplemental Security Income from the Social Security Administration (information formerly accessed through TASS); and
- o User profile information from the PIC database.

B. What EIV Participant Data Is Used For

EIV data is the first level in the hierarchy of income verification. The EIV data may be used in the following way:

- o To verify a participant's eligibility for participation in a HUD rental assistance program and to determine the level of assistance the participant is entitled to receive; and
- o No adverse action can be taken against a participant until the PHA has independently verified the EIV, and the participant has been granted an opportunity to contest any adverse findings through the established grievance hearing or other legal procedures.

Applicability

The procedures in this document apply to all Culver City Housing Agency (CCHA) staff that access EIV data.

Purpose

The purpose of this document is to establish the CCHA policies and procedures to assure that the practices, controls and safeguards used by the CCHA are in compliance with the Federal laws regarding the protection of this information.

Privacy Act

The data provided via the EIV system will be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data. Privacy of data and data security for computer systems are covered by a variety of Federal laws and regulations. The Privacy Act of 1974 as amended, 5 U.S.C. 552 (a), is one such regulation. The full text of the Privacy Act can be accessed at <http://www.usdoj.gov/fois/privstat.htm>.

C. Examples of Privacy Act Violations

The CCHA will not rely entirely upon staff to read and understand the Privacy Act. To ensure that staff has a complete understanding of the Privacy Act and how seemingly harmless actions may be violations, examples of Privacy Act violations will be provided during security awareness training. The following example of a security violation was explained during the HUD Satellite Broadcast introducing the EIV system:

EIV data can only be viewed by authorized PHA staff and the individual adult who the information pertains to. This means that EIV data for an adult household member in a participant family cannot be shared with another adult household member of the participant family (even the head of household) unless that family member is present or signs a waiver authorizing the other family member to view their EIV information. The Privacy Act protects the privacy of each adult family member from any unauthorized person viewing their EIV data, even another family member. However, EIV data for minor children may be viewed by the head of household.

D. CCHA Security Officer(s)

A CCHA EIV Security Officer(s) is responsible for ensuring that proper technical, physical, and administrative safeguards are in place and enforced. The duties of the CCHA EIV Security Officer(s) are as follows:

- o Conducts quarterly reviews of all User IDs issued to determine if the users still have a valid need to access the EIV data and modifies or revokes access rights as appropriate;
- o At the request of the Director, updates the EIV Security Policy and Procedures;
- o Maintains a key control log or audits the key control log to ensure that one is properly maintained (CCHA locking file cabinets);
- o Maintains a list of users who can access the restricted areas;
- o Assures that a copy of Form HUD-9886 has been signed by each member of the household, age 18 years or older, and is in the household file;
- o Ensures compliance with the PHA security policies and procedures outlined in this document;
- o Communicates security information and requirements to appropriate personnel, including coordinating and conducting security awareness training sessions;
- o Ensures that any infractions of security procedures are promptly reported to Department Director for investigation and enforcement; and
- o Ensures that all EIV records and forms (i.e. signed user agreements) are kept and updated as needed.

E. Security Awareness Training

Security awareness training is a crucial aspect of ensuring the security of the EIV system and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation.

In addition to security awareness training, the CCHA EIV Security Officer(s) will communicate security information and requirements to appropriate personnel. Security awareness training will be provided to each employee upon granting

access to the EIV system. Thereafter, annual security awareness refresher training will be provided to each employee with EIV access.

The Public Housing EIV Security Officer(s) will conduct security awareness training in the following manner:

- o The trainer and the employee will both sign a certification that EIV security training has been provided. The training certification and a record of the training material provided at the awareness training will be kept in the Public Housing EIV Security Binder;
- o At the end of the training, each employee will also sign the EIV Rules of Behavior and User Agreement Form. One copy will be given to the employee to be placed in their desk manual and one copy will be retained in the CCHA EIV Security Binder. The forms will be updated once a year at the refresher training;
- o The CCHA EIV Security Officer(s) will limit the security awareness training to security awareness and compliance issues only. Instructing staff on how to navigate in the EIV modules and how to run reports or to interpret data is the responsibility of the Supervisor or designated trainer; and
- o Examples of potential Privacy Act and security violations will be provided during the training.

F. Technical Safeguards

The purpose of these technical safeguards is as follows:

- To reduce the risk of a security violation related to the EIV system's software, network, or applications;
- To identify and authenticate all users seeking access to the EIV system;
- To deter and detect attempts to access the system without authorization;
- To monitor the user activity of the EIV system;
- Each user is required to have their own User ID and Password;
- The User ID identifies the PHA's and tenant information that the user is authorized to access;
- Passwords are encrypted and the password file is protected from unauthorized access;
- The system forces all user to change their password every 21 days and limit the reuse of previous passwords;
- After three unsuccessful attempts to log in, the User ID is locked and the user must contact the HUD System Administrator to have the password reset; and

- Online warning messages that inform the user of the civil and criminal penalties associated with unauthorized use of the EIV system will be displayed.

In addition, the CCHA will follow the following technical security requirement:

- The CCHA will not save EIV data to a computer hard drive or any other automated information system (i.e. network drive, disk or CD);
- CCHA staff will not leave their computer unattended with EIV data displayed on the screen; and
- CCHA staff will not log in on another user's ID.

G. Administrative Safeguards

The Public Housing EIV Security Officer(s) will maintain security-related records and monitor programmatic security issues. They will also adhere to the following administrative safeguards:

- Ensure that all users who have access to EIV data have an Access Authorization Form signed by the Director of Housing on file;
- Ensure that all users who access the EIV system have a current signed Rules of Behavior and User Agreement on file;
- Conduct quarterly reviews of all User IDs to determine if the user still has a valid need to access the EIV data; and
- Ensure the access rights are modified or revoked as appropriate.

The Public Housing EIV Security Officer(s) will maintain the following EIV security records and forms:

- EIV Rules of Behavior and User Agreement Forms;
- EIV Access Authorization Forms;
- EIV Disposal Records List;
- EIV security violation information;
- Key control logs for secure areas or filing cabinets;
- EIV Security Awareness Training Records;
- Records of internal audits to ensure that Form HUD-9886 has been signed by each adult member of the household and is kept in the Confidential Resident File; and
- A record of all users who have approved access to EIV data, including the date access was granted and the date access was terminated.

H. Physical Safeguards

The purpose of physical safeguards is to provide barriers between unauthorized persons and documents containing private data.

Confidential Participant Files

All EIV data will be printed and saved in the “Confidential” participant file. Each participant file will be clearly labeled on the front cover as “Confidential”. This alerts staff that this file contains EIV data that must be protected at all times when not in use.

Locking File Cabinets for Confidential Files

Even though the CCHA has a monitored office building, persons unauthorized to view EIV data, such as maintenance staff, janitorial staff, or temporary staff, have access to the office spaces. In office settings where any staff other than the staff responsible for the participant file or their supervisor has access to the office, all confidential participant files will be kept in locking file cabinets. The cabinets will be locked whenever the responsible staff leaves the workspace.

Hard Copy Security Violations

The CCHA will handle EIV data in such a manner that it does not become misplaced or available to unauthorized personnel. Any marked confidential participant file will contain EIV data. Therefore the file cannot be viewed by **any personnel** that are not expressly authorized (i.e. staff in charge of the file, the supervisor of the staff in charge of the file, the CCHA EIV Security Officer(s), or the CCHA Housing Internal Auditor) and who do not have both an Access Authorization Form and a Rules of Behavior and User Agreement on file with the CCHA EIV Security Officer(s).

Viewing the EIV information of a participant outside of a staff’s caseload assignment is considered a security violation for both the staff unlawfully viewing the EIV information and for the staff that left the information unattended. Unless a supervisor has specifically authorized staff to view another staff’s EIV data, this is expressly prohibited.

Disposal of EIV Information

EIV data should be destroyed as soon as it has served its purpose or as prescribed by the program administrators’s policy and procedures. All EIV originals and any documents created in association with their use should be shredded to prevent the reconstruction of the contents. Large amounts of shredded paper should not be allowed to accumulate in the bin. It is important that a log or register be maintained of all documents shredded or destroyed.

I. Reporting Improper Disclosures

Recognition, reporting and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system.

Security violations may include the following:

- Disclosure of private data;
- Attempts to access unauthorized data; and
- Sharing of User IDs and passwords.

Upon discovery of a possible improper disclosure of EIV information or another security violation by a Public Housing Employee or any other person, the individual making the observation or receiving the information should contact the CCHA EIV Security Officer(s). The CCHA EIV Security Officer(s) will document all improper disclosures in writing on a security disclosure form, providing details including who was involved, what was disclosed, how the disclosure occurred, and where it occurred.

The following contacts will be made:

- The CCHA EIV Security Officer(s) will contact and provide the Director of Public Housing with the written documentation of the security violation;
- The Administrator or his designee will provide the HUD Field Office Public Housing Director with the written documentation; and
- The HUD Field Office Public Housing Director, upon receipt of the documentation, will make a determination regarding the referral and provision of the written documentation to the Headquarters EIV Coordinator and/or Public Housing EIV Security Officer(s) for further review and follow-up action.

J. Safeguards Provided by the Privacy Act

The Privacy Act provides safeguards for individuals against invasion of privacy by requiring Federal agencies, except as otherwise provided by law or regulation, to:

1. Permit individuals to know what records pertaining to them are collected, maintained, used or disseminated;
2. Allow individuals to prevent records pertaining to them (obtained for a particular purpose) from being used or made available for another purpose without their consent;
3. Permit individuals to gain access to information pertaining to them, obtain a copy of all or any portions thereof, and correct or amend such records;

ATTACHMENT 3

4. Collect, maintain, use or disseminate personally identifiable information in a manner that ensures the information is current and accurate, and that adequate safeguards are provided to prevent misuses of such information;
5. Permit exemption from the requirements of the Act only where an important public policy need exists as determined by specific statutory authority; and
6. Be subject to a civil suit for any damages that occur as a result of action that violates any individual's rights under this Act.