

Mastering EIV Compliance

EIV Income
Discrepancies



OREGON HOUSING *and*
COMMUNITY SERVICES

Valerie Duncan, Compliance Officer

- 16 years working in government
- Compliance
- MORs
- Rent Adjustments
- Program development
- Training

Agenda

- Income Discrepancy over
- How to Resolve Discrepancies
- Hands on Discrepancy

Learning Goals

01

Understand
purpose of
Income
Discrepancies

02

Ability to read and
understand
Income
Discrepancy
reports

03

Strengthen ability
to investigate and
resolve Income
Discrepancies

What is it? - Income Discrepancy

- Income reported to TRACS and EIV did not match up
- Investigation required for the period of analysis
- Compare what the EIV report shows to what was included on the tenants 50059s during the period of analysis

Resolving Income Discrepancies Cont.

- Steps to Resolving
 - Determine if valid or invalid
 - Invalid – document investigation and outcome
 - Valid
 - Meet with tenant to discuss, if necessary
 - Obtain verification(s)
 - Process correction/IR, if necessary
 - Execute repayment agreement, if necessary
- Resolution Note Examples:
 - 3/30/26 - Met with Jane Smith. Processing an 11/1/22 IR to include employment.
 - 4/2/26 - Met with Jane Smith. This was prior to move-in. Termination of employment received 4/15/26. Last day worked was 2/15/25.

Period of Income

- This is the period when the income discrepancy occurred
- **15 months** prior to the effective AR (**effective date of action**) and the end date is **3 months** prior to annual re-certification month. For example, if the family's annual re-certification is 08/01/25, the family's POI is 05/01/2024 – 04/30/25.

Effective Date of Action:

01/01/2026

Property Name:				Explanation:			
HOH:							
Unit #:							
Discrepancy Period:							
Name:				Name:			
Income Source:				Income Source:			
Date	EIV	Date	50059	Date	EIV	Date	50059
5/1/2024		5/1/2024		1/1/2020	\$0.00	1/1/2020	\$0.00
6/1/2024		6/1/2024		2/1/2020	\$0.00	2/1/2020	\$0.00
7/1/2024		7/1/2024		3/1/2020	\$0.00	3/1/2020	\$0.00
8/1/2024		8/1/2024		4/1/2020	\$0.00	4/1/2020	\$0.00
9/1/2024		9/1/2024		5/1/2020	\$0.00	5/1/2020	\$0.00
10/1/2024		10/1/2024		6/1/2020	\$0.00	6/1/2020	\$0.00
11/1/2024		11/1/2024		7/1/2020	\$0.00	7/1/2020	\$0.00
12/1/2024		12/1/2024		8/1/2020	\$0.00	8/1/2020	\$0.00
1/1/2025		1/1/2025		9/1/2020	\$0.00	9/1/2020	\$0.00
2/1/2025		2/1/2025		10/1/2020	\$0.00	10/1/2020	\$0.00
3/1/2025		3/1/2025		11/1/2020	\$0.00	11/1/2020	\$0.00
4/1/2025		4/1/2025		12/1/2020	\$0.00	12/1/2020	\$0.00
Total	\$0.00		\$0.00	Total			\$0.00
Name:				Name:			
Income Source:				Income Source:			
Date	EIV	Date	50059	Date	EIV	Date	50059
1/1/2020	\$0.00	1/1/2020	\$0.00	1/1/2020	\$0.00	1/1/2020	\$0.00
2/1/2020	\$0.00	2/1/2020	\$0.00	2/1/2020	\$0.00	2/1/2020	\$0.00
3/1/2020	\$0.00	3/1/2020	\$0.00	3/1/2020	\$0.00	3/1/2020	\$0.00
4/1/2020	\$0.00	4/1/2020	\$0.00	4/1/2020	\$0.00	4/1/2020	\$0.00
5/1/2020	\$0.00	5/1/2020	\$0.00	5/1/2020	\$0.00	5/1/2020	\$0.00
6/1/2020	\$0.00	6/1/2020	\$0.00	6/1/2020	\$0.00	6/1/2020	\$0.00
7/1/2020	\$0.00	7/1/2020	\$0.00	7/1/2020	\$0.00	7/1/2020	\$0.00
8/1/2020	\$0.00	8/1/2020	\$0.00	8/1/2020	\$0.00	8/1/2020	\$0.00
9/1/2020	\$0.00	9/1/2020	\$0.00	9/1/2020	\$0.00	9/1/2020	\$0.00
10/1/2020	\$0.00	10/1/2020	\$0.00	10/1/2020	\$0.00	10/1/2020	\$0.00
11/1/2020	\$0.00	11/1/2020	\$0.00	11/1/2020	\$0.00	11/1/2020	\$0.00
12/1/2020	\$0.00	12/1/2020	\$0.00	12/1/2020	\$0.00	12/1/2020	\$0.00
Total	\$0.00		\$0.00	Total	0		\$0.00
EIV total				\$0.00			
50059 total				\$0.00			
Discrepancy amount				\$0.00			

EIV Quarters	
Q1	Jan-Mar
Q2	Apr-Jun
Q3	Jul-Sept
Q4	Oct-Dec



Income Discrepancy – Real Example

3/26/26, 4:38 PM

Household Exceeds Income Discrepancy Report

Print

Income Discrepancy Report

Head of Household Information

Name: [REDACTED]
Social Security Number: [REDACTED]
Contract Number: [REDACTED]
Project Number: [REDACTED]
Project: [REDACTED]

Effective Date of Action: 08/01/2025

Next Re-certification Date: 08/01/2026

Projected Annual Wages and Benefits from Form HUD-50059: \$0.00

Period Of Income for Discrepancy Analysis 05/01/2024 - 04/30/2025

Discrepancy Analysis

	Actuals	Annualized Last Quarter
Reported Annual Wages and Benefits from EIV Data:	\$16,543.99	\$16,432.57
Amount of Annual Income Discrepancy:	(\$16,543.99)	(\$16,432.57)
Amount of Monthly Income Discrepancy:	(\$1,378.67)	(\$1,369.38)
Percentage of Income Discrepancy:	(100%)	(100%)



Income Discrepancy – Real Example

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Confidential. Privacy Act Data. Civil and criminal penalties apply to misuse of this data. HUD-EIV:Income Infor

Income Report

Print

Wage and Benefit Report for Household of [REDACTED]

Contract Number:	[REDACTED]	Subsidy Type	Section 8
Project:	[REDACTED]	Project Number:	
Next Re-certification Date:	08/01/2026	Form 50059 as of:	08/18/2025
Address:	[REDACTED]		
Most Recent Type of Action:	AR-Annual Recertification	Effective Date:	08/01/2025

Head of Household:	[REDACTED]		
Social Security Number:	***-**- [REDACTED]	Date of Birth:	XX/XX/ [REDACTED]



Income Discrepancy – Real Example

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Confidential. Privacy Act Data. Civil and criminal penalties apply to misuse of this data. HUD-EIV:Income In

Household Member: [REDACTED] SSN: ***-**-****
 Date of Birth: XX/XX/XX Relationship: Head of Household

Employment Information

EIV received no Employment (W4) data.

Wages

EIV received no income data.

Unemployment Benefits

Pay Period	Amount	Date Received by EIV
Q4 of 2021	\$0.00	11/15/2023

Social Security Benefits

Verification Data		Benefit History		
Payment Status Code:	Date of Current Entitlement:	Date	Gross Benefit	
C Current payment status (except railroad payment)	08/2020	12/2025	\$1,443.00	Benefits paid
Net Monthly Benefit if Payable: \$1,443.00		12/2024	\$1,404.00	Benefits paid
Payee Name and Address: [REDACTED]		12/2023	\$1,370.00	Benefits paid
		12/2022	\$1,327.00	Benefits paid
		12/2021	\$1,221.00	Benefits paid
		12/2020	\$1,153.00	Benefits paid
		12/2019	\$1,138.00	Benefits paid

POI - 05/01/2024 – 04/30/25

EIV

SS 5/1/24 \$1,370

SS 12/1/24 \$1,404

8/7/23 MI SS \$1,327



Reviewing the income on the 50059

POI 05/01/2024 – 04/30/25

8/7/23 MI income

SSI - \$15,924

Covers 5/1/24-7/31/24

04. PREVIOUS FLEAD MIDDLE INITIAL				05. PREVIOUS FLEAD FIRST LAST					
Section D. Income Information				Section E. Asset Information					
66. Mbr No	67. Income Type Code	68. Amount	69. SSN Benefits Claim No.	75. Mbr No.	76. Description	77. Status	78. Cash Value	79. Actual Yearly Income	80. Date Divested
01	N	15,924		01	Direct Express Card	C	1,220	0	
70. Total Employment Income				0	81. Total Cash Value of Assets				1,220

8/1/24 AR income

SSI - \$16,440

Covers 8/1/24-4/30/25

Section D. Income Information				Section E. Asset Information					
66. Mbr No	67. Income Type Code	68. Amount	69. SSN Benefits Claim No.	75. Mbr No.	76. Description	77. Status	78. Cash Value	79. Actual Yearly Income	80. Date Divested
01	N	16,440		01	Direct Express Card	C	507	0	

Using the Income Discrepancy Worksheet

8/7/23 MI income

SSI - \$15,924

$\$15,924/12=\$1,327$

8/1/24 AR income

SSI - \$16,440

$\$16,440/12=\$1,370$

Name:		Name of Tenant with Income	
Income Source:		Social Security	
Date	EIV	Date	50059
5/1/2024	\$1,370.00	5/1/2024	\$1,327.00
6/1/2024	\$1,370.00	6/1/2024	\$1,327.00
7/1/2024	\$1,370.00	7/1/2024	\$1,327.00
8/1/2024	\$1,370.00	8/1/2024	\$1,370.00
9/1/2024	\$1,370.00	9/1/2024	\$1,370.00
10/1/2024	\$1,370.00	10/1/2024	\$1,370.00
11/1/2024	\$1,370.00	11/1/2024	\$1,370.00
12/1/2024	\$1,404.00	12/1/2024	\$1,370.00
1/1/2025	\$1,404.00	1/1/2025	\$1,370.00
2/1/2025	\$1,404.00	2/1/2025	\$1,370.00
3/1/2025	\$1,404.00	3/1/2025	\$1,370.00
4/1/2025	\$1,404.00	4/1/2025	\$1,370.00
Total	\$16,610.00		\$16,311.00

EIV total	\$16,610.00
50059 total	\$16,311.00
Discrepancy amount	\$299.00

Less than \$2,400

Explanation: Invalid Discrepancy

EIV

SS 5/1/24 \$1,370

SS 12/1/24 \$1,404



But wait! There's more!

- Incorrect Income Type Code
- Creates false discrepancy
- Possible MOR finding/Observation

62. Previous Head Middle Initial

Section D. Income Information			
66. Mbr No	67. Income Type Code	68. Amount	69. SSN Benefits Claim No.
01	N	16,848	

Income Discrepancy – Real Example

3/27/26, 12:34 PM

Household Exceeds Income Discrepancy Report

Income Discrepancy Report

Print

Head of Household Information

Name:

[REDACTED]

Social Security Number:

-**-*

Contract Number:

[REDACTED]

Project Number:

[REDACTED]

Project:

[REDACTED]

Effective Date of Action:

06/01/2025

Next Re-certification Date:

06/01/2026

Projected Annual Wages and Benefits from Form HUD-50059:

\$11,028.00

Period Of Income for Discrepancy Analysis

03/01/2024 - 02/28/2025

Discrepancy Analysis

Reported Annual Wages and Benefits from EIV Data:

\$21,998.51

Annualized Last Quarter

\$10,708.60

Amount of Annual Income Discrepancy:

(\$10,970.51)

\$319.40

Amount of Monthly Income Discrepancy:

(\$914.21)

\$26.62

Percentage of Income Discrepancy:

(49.87%)

2.98%



Income Discrepancy – Real Example

POI - 03/01/2024 – 02/28/25

EIV Wages

Q1 2024 $\$5,233/3 = \$1,744$ mo
3/1/24 - \$1,744

Q2 2024 \$4,681

4/1/24-6/30/24 - \$4,681

Q3 2024 \$4,779

7/1/24-9/30/24 - \$4,779

Wages

Pay Period	Amount	FEIN	Employer Name and Address	Date Received by EIV
Q3 of 2025	\$1,178.00	[REDACTED]	[REDACTED]	02/13/2026
Q2 of 2025	\$1,180.00	[REDACTED]	[REDACTED]	08/25/2025
Q3 of 2024	\$4,779.00	[REDACTED]	[REDACTED]	02/13/2025
Q2 of 2024	\$4,681.00	[REDACTED]	[REDACTED]	11/13/2024
Q1 of 2024	\$5,233.00	[REDACTED]	[REDACTED]	11/13/2024
Q4 of 2023	\$2,828.00	[REDACTED]	[REDACTED]	05/11/2024
Q1 of 2020	\$608.00	[REDACTED]	[REDACTED]	02/13/2021
Q1 of 2020	\$176.00	[REDACTED]	[REDACTED]	02/13/2021
Q4 of 2019	\$2,400.00	[REDACTED]	[REDACTED]	02/13/2021

Q4 2024 and Q1 2025

10/1/24-2/28/25 – no wages

Income Discrepancy – Real Example

Social Security Benefits

Verification Data

Payment Status Code: C Current payment status (except railroad payment)
Date of Current Entitlement: 12/2019
Net Monthly Benefit if Payable: \$945.00
Payee Name and Address: [REDACTED]

Benefit History

Date	Gross Benefit	
12/2025	\$945.00	Benefits paid
01/2025	\$919.00	Benefits paid
12/2024	\$919.00	Benefits paid
12/2023	\$896.00	Benefits paid
12/2022	\$869.00	Benefits paid
10/2022	\$799.00	Benefits paid
12/2021	\$799.00	Benefits paid
12/2020	\$755.00	Benefits paid

Lump Sum

Date	Amount
01/01/2026	\$0.00

Date Received by EIV: 10-JAN-26

POI - 03/01/2024 – 02/28/25

EIV

SS 3/1/24 \$896

SS 12/1/24 \$919

9/19/24 MI SS \$896

Reviewing the income on the 50059

POI - 03/01/2024 – 02/28/25

9/19/24 MI income

SSI - \$10,752

Pension - \$4,410

Covers 9/1/24-6/1/25

Section D. Income Information				Section E. Asset Information					
66. Mbr No	67. Income Type Code	68. Amount	69. SSN Benefits Claim No.	75. Mbr No.	76. Description	77. Status	78. Cash Value	79. Actual Yearly Income	80. Date Divested
01	SS	10,752		01	US Bank	C	598	0	
01	PE	4,410							

Using the Income Discrepancy Worksheet

POI - 03/01/2024 –
02/28/25

9/19/24 MI income

SSI - \$10,752

$\$10,752/12 = \896

EIV

SS 3/1/24 \$896

SS 12/1/24 \$919

Income Source:		Social Security			
Date	EIV	Date	50059		
3/1/2024	\$896.00	3/1/2024	\$0.00		
4/1/2024	\$896.00	4/1/2024	\$0.00		
5/1/2024	\$896.00	5/1/2024	\$0.00		
6/1/2024	\$896.00	6/1/2024	\$0.00		
7/1/2024	\$896.00	7/1/2024	\$0.00		
8/1/2024	\$896.00	8/1/2024	\$0.00		
9/1/2024	\$896.00	9/1/2024	\$896.00		9/19/24 MI
10/1/2024	\$896.00	10/1/2024	\$896.00		
11/1/2024	\$896.00	11/1/2024	\$896.00		
12/1/2024	\$919.00	12/1/2024	\$896.00		
1/1/2025	\$919.00	1/1/2025	\$896.00		
2/1/2025	\$919.00	2/1/2025	\$896.00		
Total	\$10,821.00		\$5,376.00		



Using the Income Discrepancy Worksheet

POI - 03/01/2024 –
02/28/25

Pension - \$4,410
\$4,410/12=\$368

Income Source:		Pension			
Date	EIV	Date	50059		
3/1/2024	\$0.00	3/1/2024	\$0.00		
4/1/2024	\$0.00	4/1/2024	\$0.00		
5/1/2024	\$0.00	5/1/2024	\$0.00		
6/1/2024	\$0.00	6/1/2024	\$0.00		
7/1/2024	\$0.00	7/1/2024	\$0.00		
8/1/2024	\$0.00	8/1/2024	\$0.00		
9/1/2024	\$0.00	9/1/2024	\$368.00	9/19/24 MI	
10/1/2024	\$0.00	10/1/2024	\$368.00		
11/1/2024	\$0.00	11/1/2024	\$368.00		
12/1/2024	\$0.00	12/1/2024	\$368.00		
1/1/2025	\$0.00	1/1/2025	\$368.00		
2/1/2025	\$0.00	2/1/2025	\$368.00		
Total	\$0.00		\$2,208.00		



Using the Income Discrepancy Worksheet

POI - 03/01/2024 –
02/28/25

9/19/24 MI Wages
No wages

EIV wages end prior to
MI

Income Source: Wages				
Date	EIV	Date	50059	
3/1/2024	\$1,744.00	3/1/2024	\$0.00	
4/1/2024	\$1,560.00	4/1/2024	\$0.00	
5/1/2024	\$1,560.00	5/1/2024	\$0.00	
6/1/2024	\$1,560.00	6/1/2024	\$0.00	
7/1/2024	\$1,593.00	7/1/2024	\$0.00	
8/1/2024	\$1,593.00	8/1/2024	\$0.00	
9/1/2024	\$1,593.00	9/1/2024	\$0.00	9/19/24 MI
10/1/2024	\$0.00	10/1/2024	\$0.00	
11/1/2024	\$0.00	11/1/2024	\$0.00	
12/1/2024	\$0.00	12/1/2024	\$0.00	
1/1/2025	\$0.00	1/1/2025	\$0.00	
2/1/2025	\$0.00	2/1/2025	\$0.00	
Total	\$11,203.00		\$0.00	



Using the Income Discrepancy Worksheet

EIV total	\$22,024.00
50059 total	\$7,584.00
Discrepancy amount	\$14,440.00

Explanation:	Wages ended prior to MI - no action need

But Wait! There's More!

Wages

Pay Period	Amount	FEIN	Employer Name and Address	Date Received by EIV
Q3 of 2025	\$1,178.00	[REDACTED]	[REDACTED]	02/13/2026
Q2 of 2025	\$1,180.00	[REDACTED]	[REDACTED]	08/25/2025
Q3 of 2024	\$4,779.00	[REDACTED]	[REDACTED]	02/13/2025
Q2 of 2024	\$4,681.00	[REDACTED]	[REDACTED]	11/13/2024
Q1 of 2024	\$5,233.00	[REDACTED]	[REDACTED]	11/13/2024
Q4 of 2023	\$2,828.00	[REDACTED]	[REDACTED]	05/11/2024
Q1 of 2020	\$608.00	[REDACTED]	[REDACTED]	02/13/2021
Q1 of 2020	\$176.00	[REDACTED]	[REDACTED]	02/13/2021
Q4 of 2019	\$2,400.00	[REDACTED]	[REDACTED]	02/13/2021

- Q2 & Q3 2025
- MOR finding if no IR

Repayment Agreements

- Repayment of Subsidy of HUD
- Repayment options
 - Pay the amount in full
 - Enter into a repayment agreement
 - Cannot be more than 40% total of the adjusted income
 - Contain a clause that allows the tenant or management to renegotiate if the income increases or decreases by \$200 or more



Questions?