COMPUTER MATCHING AGREEMENT

BETWEEN

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
ADMINISTRATION FOR CHILDREN AND FAMILIES
OFFICE OF CHILD SUPPORT ENFORCEMENT

AND

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Verification of Employment and Income and Analysis

U.S. Department of Health and Human Services Data Integrity Board #2620

I. PURPOSE, LEGAL AUTHORITY, AND DEFINITIONS

This computer matching agreement ("agreement") governs a matching program between the U.S Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement (OCSE), and the U.S. Department of Housing and Urban Development (HUD). This agreement sets forth the terms and conditions of the matching program. OCSE is the "source agency" and HUD is the "recipient agency" as defined by the Privacy Act. 5 U.S.C. § 552a(a)(9) and (11). The HUD Office of Public and Indian Housing (PIH) and Office of Multifamily Housing (MFH), and the OCSE Division of Federal Systems are the components within their respective agencies responsible for the agreement.

OCSE and HUD have entered into matching agreements for this matching program since 2004, the latest of which expires September 8, 2026, (*see* Appendix A). This agreement includes a security addendum, and five appendices, including a cost-benefit analysis (*see* Appendix B). A reimbursement agreement (not attached or appended) will be executed each fiscal year of the computer matching agreement in accordance with section XI of this agreement.

On December 19, 2025, the Administration for Children and Families published a notice in the Federal Register at Volume 90, Number 242, Page 59525**,** to announce that the Office of Child Support Services (OCSS) is now the Office of Child Support Enforcement (OCSE). Any reference to OCSS has now been changed to OCSE and they are one and the same.

A. Purpose of the Matching Program

The Privacy Act of 1974 ("Privacy Act"), as amended requires that each matching agreement specify the purpose and legal authority for conducting the matching program. 5 U.S.C. § 552a(o)(1)(A).

The purpose of the matching program is to help HUD in verifying the employment and income of participants in certain rental assistance programs. OCSE will provide HUD with new hire, quarterly wage, and unemployment insurance information from the National Directory of New Hires (NDNH) system of records pertaining to individuals identified by HUD who are recipients of certain rental assistance programs. HUD may also use the information, after the removal of personal identifiers, to analyze the employment and income reporting of those participants.

B. Legal Authority

Subsections 453(j)(7)(A), (C)(i), and (D)(i) of the Social Security Act (42 U.S.C. § 653(j)(7)(A), (C)(i), and (D)(i)) provide the legal authority to conduct the matching program.

Section 453(j)(7) Information comparisons for housing assistance programs states:

> (A) Furnishing of information by HUD. Subject to subparagraph (G), the Secretary of Housing and Urban Development shall furnish to the Secretary, on such periodic basis as determined by the Secretary of Housing and Urban Development in consultation with the Secretary, information in the custody of the Secretary of Housing and Urban Development for comparison with information in the National Directory of New Hires, in order to obtain information in such Directory with respect to individuals who are participating in any program under –
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> (i) the United States Housing Act of 1937 (42 U.S.C. § 1437 et seq.);
> (ii) section 202 of the Housing Act of 1959 (12 U.S.C. § 1701q);
> (iii) section 221(d)(3), 221(d)(5), or 236 of the National Housing Act (12 U.S.C. §§ 1715l(d)(3), 1715l(d)(5) or 1715z-1);
> (iv) section 811 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. § 8013); or
> (v) section 101 of the Housing and Urban Development Act of 1965 (12 U.S.C. § 1701s).
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> (C) Duties of the Secretary
> (i) Information disclosure – The Secretary, in cooperation with the Secretary of Housing and Urban Development, shall compare information in the National Directory of New Hires with information provided by the Secretary of Housing and Urban Development with respect to individuals described in subparagraph (A), and shall disclose information in such Directory regarding such individuals to the Secretary of Housing and Urban Development, in accordance with this paragraph, for the purposes specified in this paragraph.
> ***
> (D) Use of information by HUD. The Secretary of Housing and Urban Development may use information resulting from a data match pursuant to this paragraph only —
> (i) for the purpose of verifying the employment and income of individuals described in subparagraph (A); and

(ii) after removal of personal identifiers, to conduct analyses of the employment and income reporting of individuals described in subparagraph (A).

42 U.S.C. §§ 653(j)(7)(A), (C)(i), and (D).

Subsection 453(j)(7)(D)(ii) of the Social Security Act provides legal authority to conduct analysis of employment and income reporting, "after the removal of personal identifiers." 42 U.S.C. § 653(j)(7)(D)(ii). HUD does not currently use NDNH match information to conduct analysis of employment and income reporting; however, if HUD seeks to conduct such analyses in the future, HUD must first obtain OCSE approval by requesting authorization and providing OCSE with documentation of the proposed analyses. The documentation must include the specific purpose for the analyses, specific HUD users, procedures for the removal of personal identifiers, data storage location and safeguards, retention periods, and other information about the use of the results of the information comparison for analyses.

C. Definitions

The following terms contained in this agreement will have the meaning given to the terms in the Privacy Act at 5 U.S.C. § 552a(a):

(1) "Federal benefit program" means any program administered or funded by the federal government, or by any agent or state on behalf of the federal government, providing cash or in-kind assistance in the form of payments, grants, loans, or loan guarantees to individuals.
(2) "Individual" means a citizen of the United States or an alien lawfully admitted for permanent residence.
(3) "Maintain" means to maintain, collect, use, or disseminate. "Matching program" means any computerized comparison of – (i) two or more automated systems of records or a system of records with non-federal records for the purpose of – (I) establishing or verifying the eligibility of, or continuing compliance with statutory and regulatory requirements by, applicants for, recipients or beneficiaries of, participants in, or providers of services with respect to, cash or in-kind assistance or payments under federal benefit programs, or (II) recouping payments or delinquent debts under such federal benefit programs.
(4) "Matching program" means any computerized comparison of – (i) two or more automated systems of records or a system of records with non-federal records for the purpose of – (I) establishing or verifying the eligibility of, or continuing compliance with statutory and regulatory requirements by, applicants for, recipients or beneficiaries of, participants in, or providers of services with respect to, cash or in-kind assistance or payments under federal benefit programs, or (II) recouping payments or delinquent debts under such federal benefit programs…
(5) "Non-federal agency" means any state or local government, or agency thereof, which receives records contained in a system of records from a source agency for use in a matching program…
(6) "Recipient agency" means any agency, or contractor thereof, receiving records contained in a system of records from a source agency for use in a matching program.

(7) “Record” means any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, the individual’s education, financial transactions, medical history, and criminal or employment history, and that contains the individual’s name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.

(8) “Routine use" means, with respect to the disclosure of a record, the use of such record for a purpose which is compatible with the purpose for which it was collected.

(9) “Source agency" means any agency which discloses records contained in a system of records to be used in a matching program, or any state or local government, or agency thereof, which discloses records to be used in a matching program.

(10) “System of records” means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particulars assigned to the individual.

Additional terms used in this agreement are defined as follows:

(11) “Federal Parent Locator Service” (FPLS) means a service, which includes the NDNH, conducted under the direction of OCSE in compliance with section 453 of the Social Security Act for purposes specified in sections 453 and 463. 42 U.S.C. §§ 653 and 663.

(12) “National Directory of New Hires” (NDNH) means an automated directory maintained in the FPLS established by subsection 453(i)(1) of the Social Security Act, containing new hire, unemployment insurance, and quarterly wage information supplied by state and federal agencies in compliance with subsections 453A(b)(1)(C) and (g)(2) of the Social Security Act. 42 U.S.C. §§ 653(i)(l), 653a(b)(1)(C), and (g)(2).

(13) “New hire information” means employer information about newly hired employees reported to the NDNH by state and federal agencies in compliance with subsections 453A(b)(1)(C) and (g)(2)(A), and 453(i)(1) of the Social Security Act. 42 U.S.C. §§ 653a(b)(1)(C) and (g)(2)(A), and 653(i)(1).

(14) “Quarterly wage information” means wage information reported to the NDNH by state and federal agencies in compliance with subsections 453A(g)(2)(B) and 453(i)(1) and (n) of the Social Security Act. 42 U.S.C. §§ 653a(g)(2)(B), 653(i)(1) and (n).

(15) “Unemployment insurance information” means information about benefits paid under state unemployment compensation programs and reported to the NDNH in compliance with subsections 453A(g)(2)(B) and 453(e)(3) and (i)(1) of the Social Security Act. 42 U.S.C. §§ 653a(g)(2)(B) and 653(e)(3) and (i)(1).

(16) “Contract administrator” means the agency that has entered into an Annual Contributions Contract with HUD. Such agency is a “public housing agency” defined as any state, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or

assist in the development or operation of public housing. 42 U.S.C. § 1437a(b)(6). The agency monitors the housing assistance payments contract entered into by owners.

(17) "Independent auditor" means a Certified Public Accountant or a licensed or registered public accountant having no business relationship with the private owner except for the performance of audit, systems work, and tax preparation.

(18) "Low-income housing" means decent, safe, and sanitary dwellings assisted under the United States Housing Act of 1937.

(19) "Management agent" means the entity that enters into an agreement with the owner of a housing project to manage the project in accordance with the housing assistance payments contract and HUD's requirements and regulations.

(20) "Multifamily (MF) business partners" means "private owners," "management agents," and "contract administrators" as these terms are defined herein.

(21) "Multifamily Housing Programs" means the programs administered by MF business partners under the following statutes:

i. The United States Housing Act of 1937 (42 U.S.C. § 1437 et seq.)

ii. Section 202 of the Housing Act of 1959 (12 U.S.C. § 1701q)

iii. Section 221(d)(3), 221(d)(5), or 236 of the National Housing Act of 1959 (12 U.S.C. §§ 1715I(d) and 1715z-1)

iv. Section 811 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. § 8013)

v. Section 101 of the Housing and Urban Development Act of 1965 (12 U.S.C. § 1701s)

(22) "Personnel" means HUD employees, HUD contractors, PHAs and MF business partners (acronyms defined herein).

(23) "Private owner" means the person or entity who owns the housing project containing the assisted dwelling unit and who enters into a contract with HUD to operate the project in accordance with HUD's requirements and regulations.

(24) "Public Housing" means low-income housing, and all necessary appurtenances thereto, assisted under the United States Housing Act of 1937, other than under Section 8, and includes dwelling units in a mixed finance project that are assisted by a public housing agency with capital or operating assistance.

(25) "Public Housing Agency" (PHA) means any state, county, municipality, or other governmental entity, public body, agency, or instrumentality of these entities that is authorized to engage or assist in the development or operation of low-income housing under the United States Housing Act of 1937.

(26) "Public and Indian Housing" (PIH) programs mean the Disaster Housing Assistance, Public Housing, and Section 8 tenant-based programs administered by PHAs under the United States Housing Act of 1937.

(27) "Rental Assistance" (also known as housing assistance or subsidy) means the amount HUD pays the PHA or private owner for a unit occupied by a tenant assisted under one of PIH's or MF Housing's assistance programs. It includes HUD's share of the contract rent and any utility reimbursement due to the tenant.

(28) "Subsidy" (also known as housing assistance or rental assistance) means the amount HUD pays the PHA or private owner for a unit occupied by a tenant assisted under one of PIH's or MF Housing's assistance programs. It includes HUD's share of the contract rent and any utility reimbursement due to the tenant.

(29) "Tenant" means an individual or family renting or occupying an assisted dwelling unit.

(30) "Enterprise Income Verification (EIV) System" means the HUD system of records that maintains employment and income information collected from various federal sources, including the Social Security Administration (SSA) and the NDNH. Information in the EIV is used by authorized property owners and managers of HUD rental assistance programs to identify and prevent fraud, verify reported income, and reduce errors in subsidy payments, and maintain the integrity of HUD rental assistance programs.

II. JUSTIFICATION AND ANTICIPATED RESULTS

The Privacy Act requires that each matching agreement specify the justification for the program and the anticipated results, including a specific estimate of any savings. 5 U.S.C. § 552a(o)(1)(B).

A. Cost-Benefit Analysis

Unless statutorily excepted or waived by both agencies' Data Integrity Boards (DIBs), a cost-benefit analysis must be completed and submitted to the DIBs to consider in determining whether to approve the matching program. 5 U.S.C. § 552a(u)(4)(A). If the analysis does not demonstrate that the matching program is likely to be cost effective, the DIBs may approve the matching agreement based on other supporting justifications. *See* OMB guidance in *Privacy Act of 1974: Final Guidance Interpreting the Provisions of Public Law 100-503, the Computer Matching and Privacy Protection Act of 1998*, *54 FR 25818 (June 19, 1989)* at pages 25821 and 25828-25829.

HUD conducted a cost-benefit analysis, in accordance with the Privacy Act, based upon information from FY 2025 (*see* Appendix B). The cost-benefit analysis demonstrates that the matching program is likely to be cost effective.

B. Other Supporting Justifications

This matching program supports compliance with the Payment Integrity Act of 2019 (31 U.S.C. §§ 3352 et seq.) which focuses on preventing improper payments to ensure funding is serving its intended purpose as first set out in E.O. 13520, *Reducing Improper Payments and Eliminating Waste in Federal Programs* (Nov. 20, 2009), which states the policies of federal programs that serve their intended beneficiaries provide public scrutiny of significant payment errors and eliminate the highest improper payments; establish accountability for reducing improper payments; and coordinate federal, state, and local government action to identify and eliminate improper payments, and implement guidelines in OMB Memorandum

M-18-20, *Transmittal of Appendix C to Circular A-123, Requirements for Payment Integrity Improvement*, (June 26, 2018). Payment integrity is a top priority and OMB guidance provides the framework to reduce the administrative burden, allowing agencies to focus on identifying, assessing, prioritizing, and responding to payment integrity risks and the underlying causes of improper payments. *See* OMB Memorandum M-21-19, *Transmittal of Appendix C to Circular A-123, Requirements for Payment Integrity Improvement* (March 5, 2021).

HUD specific statutory and regulatory requirements further justify the matching program and the analysis of employment and income reporting. HUD must establish appropriate and necessary procedures to assure that income data provided to public housing agencies and owners by applicants for and recipients of assistance under 42 U.S.C. §1437f is complete and accurate. HUD must randomly, regularly, and periodically select a sample of families and obtain information from external agency data sources about individuals in the families only for the purpose of verifying incomes, data concerning unemployment compensation and federal income taxes to determine eligibility of families for benefits (and the benefits amount, if any). 42 U.S.C. § 1437f(k). HUD program administrators must use accurate income amounts to determine housing rental assistance. *See* 24 CFR § 5.659 and Chapter 5, Section 3: Verification of the Occupancy Requirements of Subsidized Multifamily Housing Programs, 4350.3 REV-1. For public housing and tenant-based Section 8 programs, PHAs must use accurate income amounts to determine rental assistance and verify a family's annual income and other factors that affect the determination of adjusted income or income-based rent. 24 CFR §§ 960.259 and 982.516.

During FY 2025, HUD identified over $5.8 billion in questionable payments, which included 165,000 households receiving assistance despite having incomes above local limits. This lack of oversight and data matching with modern systems has resulted in a failure to provide a compliant estimate of improper payments since 2016, a period during which $315 billion was disbursed with limited verification of tenant income. This is estimated to have resulted in approximately $2.5 billion in overpayments to rental recipients in FY2025 if not for the data matching with NDNH. With an estimated $4.04 million in Personnel and Computer Costs in FY2025, this represents a return of over 600:1.

NDNH is a centralized database of wage and employment information and provides effective and efficient means to obtain information to help HUD identify subsidy errors. The matching program will also help HUD in detecting fraud, waste, and abuse, and enhancing program integrity by providing useful information on the employment status and wages of HUD program applicants and recipients, specifically: 1) those who are employed with the federal government; 2) those who are employed in another state, including those who have been rehired by a previous employer after having been separated from such prior employment for at least 60 consecutive days, and 3) those whose information is not readily available through the State Directory of New Hires, state workforce agencies, or other data reporting systems. 42 U.S.C. § 653a(a)(2).

The positive results of the previous matching programs between HUD and OCSE further justify the proposed matching program. *See* section II.B and Appendix B.

C. Specific Estimate of Savings

HUD estimates that use of the NDNH data has identified programs susceptible to significant improper payments and has saved an estimated $208 million to PHA administered HUD rental housing programs.

III. RECORDS DESCRIPTION

The Privacy Act requires that each matching agreement specify a description of the records that will be matched, including each data element that will be used, the approximate number of records that will be matched, and the projected starting and completion dates of the matching program. 5 U.S.C. § 552a(o)(1)(C).

A. Systems of Records

1. OCSE

OCSE will disclose match results to HUD from the following system of records: *OCSS National Directory of New Hires*, System No. 09-80-0381; *see* System of Records Notice (SORN) published in full at 89 FR 25625 (April 11, 2024). The disclosure of NDNH records by OCSE to HUD constitutes a "routine use," as defined by the Privacy Act. 5 U.S.C. § 552a(b)(3). Routine use (12) published in the NDNH SORN authorizes the disclosure of NDNH records to HUD. 89 FR 25625, 25629 (April 11, 2024). In addition to the above routine use disclosure published by OCSE pursuant to the Privacy Act at 5 U.S.C. 552a(b)(3), the Privacy Act permits an agency to make other disclosures described at 5 U.S.C. 552a(b) without the data subject's consent and without publishing a routine use. Most of those standardized disclosures are not, in fact, permissible for NDNH data due to restrictions in NDNH's authorizing statute at 42 U.S.C. 653(l)(1). See Section VIII of this agreement and OCSE National Directory of New Hires System of Record Notice.

2. HUD

The HUD system of records from which HUD will disclose records used in the information comparison will be retrieved from, and the results of the information comparison will be maintained within, the following system of records: *Enterprise Income Verification (EIV)*, No. HUD/PIH-5, 87 FR 50635 (August 17, 2022). Routine use (D) in that system of records authorizes the disclosure of HUD records to OCSE. 87 FR 50635, 50636 (August 17, 2022).

B. Number of Records Involved

Each HUD input file contains approximately 6.4 million records, which represent approximately 8.8 million individuals participating in the specified HUD housing programs. Of this total, approximately 6.6 million records pertain to individuals who participate in

HUD's PIH programs and approximately 2.2 million records pertain to individuals who participate in HUD's MF Housing programs. However, these numbers may fluctuate within the effective period of the agreement.

In accordance with subsection 453(j)(7)(C)(i) of the Social Security Act, the output file provided to HUD by OCSE will contain NDNH new hire, quarterly wage, and unemployment insurance information, if any, about the individuals whose records are contained in the HUD input file. 42 U.S.C. § 653(j)(7)(C)(i).

The approximate number of records in the output file provided to HUD by OCSE will depend upon the number of individuals whose information is maintained in the NDNH and the amount of NDNH information, if any, associated with those individuals.

C. Specified Data Elements Used in the Match

1. Data Elements in the HUD Input File

The HUD input file provided to OCSE will contain records about individuals who are participating in certain housing programs described in subparagraph (A) of subsection 453(j)(7) of the Social Security Act. Each individual record contains the following data elements, where available:

- First name
- Last name
- Date of birth
- Social Security number (SSN)
- Name/SSN verification request

2. Verification of Name and SSN Combinations

To enhance the accuracy of records used in the matching program and fairness to the individuals to whom the records pertain, HUD verifies the name, date of birth, and SSN combinations contained in the input file using SSA processes before transmitting the input file to OCSE. Such verification increases the likelihood that NDNH information provided to HUD pertains to the appropriate individuals.

3. HUD and NDNH Data Element Used to Conduct the Comparison

OCSE will compare the verified SSNs provided by HUD to SSNs in the NDNH, in accordance with subsection 453(j)(7)(C)(i) of the Social Security Act. 42 U.S.C. § 653(j)(7)(C)(i).

4. NDNH Data Elements

To accomplish the purposes of this matching program, and in accordance with subsection 453(j)(7)(B) of the Social Security Act, which permits HUD to request

NDNH information only to the extent necessary to verify the employment and income of individuals who are participating in the programs specified in section I.B of this agreement, HUD requests the following data elements from the NDNH new hire, quarterly wage, and unemployment insurance files:

a. New Hire File

- New hire processed date
- Employee name
- Employee address
- Employee date of hire
- Employee state of hire
- Federal Employer Identification Number
- State Employer Identification Number
- Department of Defense code
- Employer name
- Employer address
- Transmitter agency code
- Transmitter state code
- Transmitter state or agency name

b. Quarterly Wage File

- Quarterly wage processed date
- Employee name
- Federal Employer Identification Number
- State Employer Identification Number
- Department of Defense code
- Employer name
- Employer address
- Employee wage amount
- Quarterly wage reporting period
- Transmitter agency code
- Transmitter state code
- Transmitter state or agency name

c. Unemployment Insurance File

- Unemployment insurance processed date
- Claimant name
- Claimant address
- Claimant benefit amount
- Unemployment insurance reporting period
- Transmitter state code
- Transmitter state or agency name

D. Frequency of Data Exchanges

Subsection 453(j)(7)(A) of the Social Security Act authorizes HUD to furnish input files to OCSE, "on such periodic basis as determined by the Secretary of Housing and Urban Development in consultation with the Secretary of the U.S. Department of Health and Human Services . . . " 42 U.S.C. § 653(j)(7)(A). HUD has determined that it will provide OCSE with input files for comparison with information in the NDNH, containing the following approximate number of records in the following frequencies:

- 6.4 million records monthly against the new hire file
- 6.4 million records quarterly against the quarterly wage file
- 6.4 million records quarterly against the unemployment insurance file
- Approximately 150,000 records in non-quarterly months (eight times per year), against the quarterly wage and unemployment insurance files, about new program participants, participants who have turned 18, or participants who have had a major change of status

E. Projected Start and Completion Dates

The projected start date of this agreement is September 9, 2026, and the projected expiration date is March 8, 2028 (18 months from the start date). The parties may, within three months prior to the expiration date of this agreement, renew the agreement for a period of up to one year, if the requirements stated in section XII.A are met, which would make the expiration date of this agreement March 8, 2029.

IV. NOTICE PROCEDURES

A. Individualized Notice that Information May Be Subject to Verification through Matching Programs and Written Consent

The Privacy Act requires that the matching agreement specify procedures for providing individualized notice at the time of application, and periodically thereafter, as directed by the Data Integrity Board of the agency, subject to guidance provided by the Director of the Office of Management and Budget, to applicants for and recipients of financial assistance or payments under federal benefit programs and that any information provided by such applicants and recipients may be subject to verification through matching programs. 5 U.S.C. § 552a(o)(1)(D)(i-ii).

Subsection 453(j)(7)(G) of the Social Security Act also provides that HUD "shall not seek, use, or disclose NDNH information relating to an individual without the prior written consent of such individual (or of a person legally authorized to consent on behalf of such individual)." 42 U.S.C. § 653(j)(7)(G). To comply with this requirement, HUD has implemented procedures and developed forms for providing individualized notice at the time of application and periodically thereafter. The notice is provided in forms that individuals complete to make initial applications and subsequent annual recertifications or

reexaminations; it informs the applicants or recipients that the information they provide may be verified through matching programs and obtains their prior written consent to same. The notice appears in the federal form, HUD-9886, *Authorization for the Release of Information/Privacy Act Notice* and HUD-9887, *Notice and Consent for the Release of Information*, contained in the "Document Package for Applicant's/Tenant's Consent to the Release of Information." *See* Appendix C.

B. Constructive Notice of Matching Program

The Privacy Act requires a recipient agency to publish notice of the establishment or revision of a matching program in the *Federal Register,* at least 30 days prior to conducting such program. 5 U.S.C. § 552a(e)(12).

HUD will publish the required public notice of this matching program in the *Federal Register* at least 30 days prior to conducting the matching program. The notice cannot be published until HUD has reported the matching program to the Office of Management and Budget (OMB) and Congress for advance review and OMB has completed its advance review as required by 5 U.S.C. § 552a(o)(2)(A) and (r) and OMB Circular A-108, *Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act* (Dec. 23, 2016), at pages 17-23.

HUD will also provide a copy of the published notice to OCSE immediately upon publication in the *Federal Register*; HUD and HHS will post the agreement and the published matching notice on their Privacy Program website page as required by OMB Memorandum M-23-22, *Delivering a Digital-First Public Experience,* September 22, 2023.

V. VERIFICATION PROCEDURES AND OPPORTUNITY TO CONTEST FINDINGS

The Privacy Act requires that each matching agreement specify procedures for verifying information produced in the matching program and an opportunity to contest findings, as required by subsection (p). 5 U.S.C. § 552a(o)(1)(E).

A. Verification Procedures

Subsection (p) of the Privacy Act provides as follows:

(1) In order to protect any individual whose records are used in a matching program, no recipient agency, non-federal agency, or source agency may suspend, terminate, reduce, or make a final denial of any financial assistance or payment under a federal benefit program to such individual, or take other adverse action against such individual, as a result of information produced by such matching program, until

(A)(i) the agency has independently verified the information;

(B) the individual receives a notice from the agency containing a statement of its findings and informing the individual of the opportunity to contest such findings; and

(C)(i) the expiration of any time period established for the program by statute or regulation for the individual to respond to that notice; or

(ii) in the case of a program for which no such period is established, the end of the 30-day period beginning on the date on which notice under subparagraph (B) is mailed or otherwise provided to the individual.

(2) Independent verification referred to in paragraph (1) requires investigation and confirmation of specific information relating to an individual that is used as a basis for an adverse action against the individual, including where applicable investigation and confirmation of –

(A) the amount of any asset or income involved;

(B) whether such individual actually has or had access to such asset or income for such individual's own use; and

(C) the period or periods when the individual actually had such asset or income.

(3) Notwithstanding paragraph (1), an agency may take any appropriate action otherwise prohibited by such paragraph if the agency determines that the public health or public safety may be adversely affected or significantly threatened during any notice period required by such paragraph. 5 U.S.C. § 552a(p).

Further, subsection (q)(1) of the Privacy Act provides that, notwithstanding any other provision of law, no source agency may disclose any record which is contained in a system of records to a recipient agency or non-federal agency for a matching program if such source agency has reason to believe that the verification and opportunity to contest requirements of subsection (p), or any matching agreement entered into under subsection (o), or both, are not being met by such recipient agency. 5 U.S.C. § 552a(q)(1). *See also* the Office of Management and Budget guidelines *Privacy Act of 1974: Final Guidance Interpreting the Provisions of Public Law 100-503, the Computer Matching and Privacy Protection Act of 1998* (June 19, 1989) at pages 25827, 25829.

B. Opportunity to Contest Findings

HUD recognizes that information obtained from the NDNH is not conclusive evidence of the wage and employment information of an identified individual but is an indication that further verification is warranted. HUD has established and implemented procedures for HUD and authorized entities to which information is redisclosed to verify information

produced in the matching program and to provide the affected individual an opportunity to contest findings. Such procedures provide that prior to taking adverse action against an individual, HUD will independently verify the information produced in the matching program; notify the individual of any findings; and inform the individual of the opportunity to contest such findings in accordance with subsections (p)(1) and (2) of the Privacy Act. 5 U.S.C. § 552a(p)(1) and (2). These procedures are stated in 24 CFR 5.236, 24 CFR 966.4(l)(3), 24 CFR 982.555 and related HUD directives and are applicable to authorized entities.

VI. DISPOSITION OF MATCHED ITEMS

The Privacy Act requires that each matching agreement specify procedures for the retention and timely destruction of identifiable records created by a recipient agency or non-federal agency in such matching program. 5 U.S.C. § 552a(o)(1)(F).

The following provisions specify the retention periods for the records contained in the HUD input file provided by HUD and the NDNH records provided to HUD in this matching program, which includes all information contained in those records, even NDNH records that are not labeled as such. At the end of the retention periods, OCSE and HUD will destroy the records, including ensuring the erasure of all electronic records.

A. HUD Records in the Input File

OCSE may retain the records contained in the input file provided to OCSE by HUD only for the time required for processing related to the matching program, but no longer than 60 days after the transmission of the file to OCSE.

B. NDNH Records in the Output File

1. Copy of NDNH Records in the Output File

OCSE may retain copies of the records contained in the NDNH output file provided to HUD by OCSE only for the time required to ensure the successful transmission of the output file to HUD, but no longer than 60 days after the transmission of the output file to HUD.

2. NDNH Records in the Output File Provided to HUD

HUD may retain the NDNH records contained in the output file provided to HUD by OCSE only for the time required to transfer such information onto the HUD system, EIV, but no longer than 60 days from the date of the disclosure of the files to HUD.

3. NDNH Records Downloaded and Maintained within the EIV

After downloading NDNH records onto the HUD system, EIV, HUD will retain the NDNH records within the EIV in accordance with the legal retention requirements HUD establishes in conjunction with the National Archives and Records Administration have been met, but no later than two years from the date of the disclosure of the information to HUD.

4. Printed NDNH Information

HUD and all authorized entities may retain printed NDNH information only for the time required to achieve the authorized purpose of the matching program, but no later than the term of the tenancy plus three years from the end of participation or move out date. Records may be retained beyond such retention period if such record is required for litigation, which was started before the expiration of the initial maximum record retention period. The HUD MF Housing requirements are in HUD Handbook 4350.3 REV-1, *Occupancy Requirements of Subsidized Multifamily Housing Programs,* Paragraph 5-23. The HUD Public and Indian Housing requirements are in 24 CFR 908.101.

VII. SECURITY PROCEDURES

The Privacy Act requires that each matching agreement specify procedures for ensuring the administrative, technical, and physical security of the records matched and the results of such programs. 5 U.S.C. § 552a(o)(1)(G).

The procedures and controls to ensure the appropriate equivalent level of security for records matched and the results of such programs are specified in the security addendum to this agreement.

NDNH comparison results must be safeguarded, whether labeled as NDNH information or commingled with other information and, if an agency commingles NDNH information, the agency must ensure that the computer matching agreement requirements and conditions apply to all information with which NDNH information is maintained.

VIII. RECORDS USAGE, DUPLICATION, AND REDISCLOSURE RESTRICTIONS

The Privacy Act requires that each matching agreement specify the prohibitions on duplication and redisclosure of records provided by the source agency within or outside the recipient agency or the non-federal agency, except where provided by law or essential to the conduct of the matching program. 5 U.S.C. § 552a(o)(1)(H). *See also* Section VI. The Privacy Act also requires that each matching agreement specify procedures governing the use by the recipient agency or non-federal agency of records provided in a matching program by a source agency, including procedures governing return of the records to the source agency or destruction of records used in such programs. 5 U.S.C. § 552a(o)(1)(I).

Restrictions on duplication, redisclosure, and use of NDNH records are found in the Social Security Act. Subsection 453(l)(1) requires that NDNH information and the results of comparisons using NDNH information will not be used or disclosed except as expressly provided in section 453, subject to section 6103 of the Internal Revenue Code of 1986. 42 U.S.C. § 653(l)(1). Subsection 453(l)(2) provides that an administrative penalty (up to and including dismissal from employment), and a fine of $1,000 will be imposed for each act of unauthorized access to, disclosure of, or use of, information in the NDNH by any officer or employee of the United States or any other person who knowingly and willfully violates the requirement. 42 U.S.C. § 653(l)(2). Subsection 453(m) requires the Secretary of the U.S. Department of Health and Human Services to establish and implement safeguards with respect to the entities established under this section designed to restrict access to confidential NDNH information to authorized persons and to restrict use of such information to authorized purposes. 42 U.S.C. § 653(m)(2).

All duplicates, redisclosures, and uses of HUD information and NDNH information requested by HUD and approved by OCSE, are identified in this agreement. Further redisclosures and uses by OCSE and HUD, or the authorized entities identified in section VIII.E, are prohibited under this agreement. Further redisclosures and uses may be permitted only if: 1) specifically requested by HUD, 2) authorized under subsection 453(j)(7)(E) of the Social Security Act, 3) governed by a written modification to this agreement, and 4) supported by the documentation agreed upon by OCSE and HUD for ensuring compliance with the privacy and security safeguards in this agreement, including the security addendum.

Subsection 453(j)(7) of the Social Security Act, under which this matching program is authorized, further restricts the redisclosure and use of records as described in the following sections.

A. Determination that Disclosures Do Not Interfere with the Child Support Program

Subsection 453(j)(7)(C)(ii) of the Social Security Act provides that the Secretary of Health and Human Services will make disclosures to HUD only to the extent that the Secretary determines that such disclosures do not interfere with the effective operation of the program under Title IV, part D of the Social Security Act. 42 U.S.C. § 653(j)(7)(C)(ii).

OCSE may not commence, or may discontinue, disclosing NDNH information upon a determination that such disclosure interferes with the effective operation of a state or federal child support program. OCSE will provide HUD with 10 days' written notice before any discontinuation of the disclosure of NDNH information.

B. Authorized Purpose and Use of NDNH Information by HUD; Verifying Employment and Income; Analyses

Subsection 453(j)(7)(D) of the Social Security Act provides that HUD may use information resulting from the information comparison only for the purpose of verifying the employment and income of individuals participating in certain HUD programs described in subparagraph

(A) and, after the removal of personal identifiers, conduct analyses of the employment and income reporting of such individuals. 42 U.S.C. § 653(j)(7)(D).

HUD will use, duplicate, copy, extract, and redisclose the results of the information comparison solely for the purposes authorized by this agreement and must comply with all privacy and security safeguards, in accordance with the terms and conditions specified in the agreement, including the security addendum.

Before using information resulting from this matching program to conduct analyses of employment and income reporting, HUD will provide OCSE with documentation, including the specific analyses being conducted, specific HUD users, procedures for the removal of personal identifiers, data storage location and safeguards, retention periods, and other information about how the results of the information comparison will be used for the analysis. HUD agrees that future plans for analyses will be approved by OCSE prior to conducting such analysis.

C. Redisclosures Authorized by Subsection 453(j)(7)(E) of the Social Security Act

Subsection 453(j)(7)(E)(ii) of the Social Security Act authorizes HUD to redisclose NDNH information to a public housing agency, the HUD Inspector General, and the Attorney General to verify employment and income of participants in housing programs described in subparagraph (A) of subsection 453(j)(7).

Subsection 453(j)(7)(E)(iv)(II) of the Social Security Act authorizes HUD to redisclose NDNH information to a private owner, a management agent, and a contract administrator in connection with the administration of certain HUD programs described in subparagraph (A) of subsection 453(j)(7) (multifamily business partners).

HUD may redisclose NDNH information under such authority if the redisclosure to such entity is: 1) specifically requested by HUD; 2) authorized under subsection 453(j)(7)(E) of the Social Security Act, as agreed upon by HUD and OCSE; and 3) identified in section VIII.E.1 and 2. *See* Appendix E.

Such redisclosures may be authorized only for the purpose of verifying the employment and income of individuals described in subparagraph (A) in accordance with subsection 453(j)(7)(E)(i) under the conditions in 453(j)(7)(E)(iii) of the Social Security Act. 42 U.S.C. § 653(j)(7)(E)(i) and (iii)

D. Evaluation of Costs, Benefits and Safeguards; Control Policies; Audit and Sanctions

Subsection 453(j)(7)(E)(iv)(I) of the Social Security Act provides that HUD and OCSE shall determine whether to permit disclosure of NDNH information to a private owner, a management agent, and a contract administrator based on an evaluation, made by HUD in consultation with and approved by OCSE, of the costs

and benefits of disclosures made to public housing agencies, the HUD Inspector General, and the Attorney General, and the adequacy of measures used to safeguard the security and confidentiality of information so disclosed. The evaluation required by subsection 453(j)(7)(E)(iv)(I) was conducted by HUD and signed by HUD and OCSE in May 2007.

Subsection 453(j)(7)(E)(ii) and (iv)(II) of the Social Security Act provides that HUD may disclose NDNH information subject to certain conditions contained in subsection 453(j)(7)(E)(iii). The conditions require disclosures to be made: (1) in accordance with data security and control policies established by HUD and approved by OCSE; (2) subject to audit in a manner satisfactory to OCSE; and (3) subject to the sanctions under subsection (l)(2) of section 453 of the Social Security Act. 42 U.S.C. § 653(j)(7)(E)(ii and(iii). HUD and OCSE have agreed to such conditions, which are contained within this agreement, including the security addendum.

E. Entities Requested by HUD to Receive Redisclosures; Authorized Purpose and Use; Conditions for Redisclosure

HUD requests and is authorized to redisclose the results of the information comparison to the following entities.

1. Public Housing Agencies, HUD Inspector General, and Attorney General; Multifamily Business Partners

HUD requests redisclosure of NDNH information to the PHAs, PHA management agents, the HUD Inspector General, the Attorney General, private owners, management agents, and contract administrators (MF business partners).

2. Limited Redisclosure to Independent Auditors and to Entities Associated with Grievance Procedures and Judicial Proceedings

HUD requests limited redisclosure of written reports containing NDNH information to certain approved independent auditors hired by the management agents, owners, or PHAs as required by the HUD Inspector General for the sole purpose of performing an audit of whether these HUD authorized entities verified tenants' employment and/or income and calculated the subsidy and rent correctly.

HUD also requests limited redisclosure of NDNH information to 1) lawyers and court personnel associated with judicial proceedings relating to independently verified unreported income identified through this matching program; and 2) lawyers and certain agency personnel associated with grievance procedures relating to independently verified unreported income identified through this matching program.

Before redisclosure to these entities, HUD must implement procedures to:
1) permit access only to NDNH information within hard copy files, 2) prohibit transmitting or transporting NDNH information in any form, 3) prohibit entering

NDNH information on any portable media, 4) require these entities to sign non-disclosure agreements (or similar documentation) which permit the use of NDNH information only for the purpose of the dispute, and 5) prohibit these entities from redisclosing NDNH information to any user not authorized by subsection 453(j)(7) of the Social Security Act and identified within this agreement.

3. Authorized Purpose and Use for Redisclosures of NDNH Information; Verifying Employment and Income

Subsection 453(j)(7)(E)(i) of the Social Security Act authorizes HUD to redisclose NDNH information to public housing agencies (PHAs), the PHA management agents, the HUD Inspector General, the Attorney General, and private owners, management agents, and contract administrators (MF business partners) for the sole purpose of verifying employment and income of participants in housing programs described in subparagraph (A) of subsection 453(j)(7). 42 U.S.C. § 653(j)(7)(E)(i).

Entities to which HUD may redisclose NDNH information are authorized to use the information only to verify employment and income of participants in housing programs, not to analyze the employment and income reporting of such participants.

PHAs, PHA management agents, private owners, management agents, and contract administrators are authorized to access and use NDNH information pertaining solely to participants of the housing programs administered by those entities.

All redisclosures of NDNH information, requested by HUD and approved by OCSE, are identified in this agreement and in the Data Flow Diagram. *See* Appendix D. The diagram identifies: 1) where and how HUD and other authorized entities maintain the NDNH information; 2) HUD and other authorized entities' personnel who have access to NDNH information; and 3) the purpose for such access.

F. HUD Responsibility to Ensure Compliance with Agreement by Authorized Entities; Measures; Conditions of Disclosure

HUD responsibilities pertaining to all privacy and security safeguards within this agreement, including the security addendum, extend to HUD contractors. HUD must ensure that the authorized entities identified in section VIII.E comply with all privacy and security safeguards within this agreement, including the security addendum, and that conditions of disclosure are met.

Prior to any redisclosure under this agreement, HUD will take the following measures to ensure such compliance: (1) establishing, documenting, and implementing, between HUD and each authorized entity, all safeguards within this agreement, including the security addendum; (2) providing authorized entities written documentation of all safeguards within this agreement; (3) entering into a written agreement or requiring a certification that those

authorized entities will comply with such safeguards; and (4) periodically monitoring to verify compliance, conducting audits, and otherwise enforcing all such safeguards within those entities.

G. Coordination of Privacy Act, FOIA and Other Requests for Information

If a OCSE or HUD receives a Privacy Act, FOIA or other request for information from a non-party to this MOA (with the exception of authorized entities identified in section VIII.E) for records or information that originated with the other party, it will refer the request to the party that originally collected the information for review and direct response to the requester. See 24 C.F.R. Parts 15 and 16; 45 C.F.R. Part 5 and 5b; and *Department of Justice, Office of Information Policy, Referrals, Consultations, and Coordination: Procedures for Processing Records When Another Agency or Entity Has an Interest in Them*, available at https://www.justice.gov/oip/blog/referrals-consultations-and-coordination-procedures-processing-records-when-another-agency.

IX. RECORDS ACCURACY ASSESSMENTS

The Privacy Act requires that each matching agreement specify information on assessments that have been made about the accuracy of records that will be used in the matching program. 5 U.S.C. § 552a(o)(1)(J).

A. NDNH Records

The information maintained within the NDNH is reported to OCSE by state and federal agencies. OCSE verifies the accuracy of name and SSN combinations maintained by OCSE against SSA databases in accordance with subsection 453(j)(1) of the Social Security Act. 42 U.S.C. § 653(j)(1). A record reported to the NDNH is considered "verified" if the name and SSN combination has a corresponding name and SSN combination within SSA databases.

One hundred percent of the employee name and SSN combinations contained in the new hire, quarterly wage and the unemployment insurance files, against which input files are compared, have been verified against SSA databases. For quarterly wage, 94 percent of name and SSN combinations have been verified because some states do not collect enough name data. However, information comparisons may be conducted, and reliable results obtained.

B. HUD Records

HUD verifies the accuracy of name and SSN combinations maintained by HUD against SSA databases. The input file to be compared to the NDNH only contains name and SSN combinations that have been verified by SSA. Thus, HUD deems 100 percent of the name and SSN combinations that HUD transmits to OCSE to be accurate.

X. COMPTROLLER GENERAL ACCESS

The Privacy Act requires that each matching agreement specify that the Comptroller General of the United States may have access to all records of a recipient agency or a non-federal agency that the Comptroller General deems necessary to monitor or verify compliance with this agreement. 5 U.S.C. § 552a(o)(1)(K). OCSE and HUD agree that the Comptroller General may have access to such records for the authorized purpose of monitoring or verifying compliance with this agreement.

XI. REIMBURSEMENT/FUNDING

Subsection 453(k)(3) of the Social Security Act requires a state or federal agency that receives information from the Secretary of the U.S. Department of Health and Human Services to reimburse the Secretary for costs incurred by the Secretary in furnishing the information. The reimbursement must be at rates which the Secretary determines to be reasonable and will include the costs of obtaining, verifying, maintaining, and comparing the information. 42 U.S.C. § 653(k)(3).

Subsection 453(j)(7)(F) of the Social Security Act requires HUD to reimburse OCSE, in accordance with subsection (k)(3), for the costs incurred by OCSE in furnishing the information. 42 U.S.C. § 653(j)(7)(F).

OCSE has established a full-cost reimbursement methodology for calculating user fees for each state or federal agency receiving information from the NDNH. A reimbursement agreement will be executed each fiscal year of the computer matching agreement and HUD will reimburse OCSE in accordance with the terms of such reimbursement agreement.

XII. DURATION OF AGREEMENT

A. Effective Date of the Agreement

As stated in III.E., HUD and OCSE intend that the effective date of this agreement will be September 8, 2026, the day after the expiration date of the renewal of the prior matching agreement, No. 2315, and intend for this agreement to remain in effect for 18 months as permitted by 5 U.S.C. § 552a(o)(2)(C).

OCSE and HUD may commence comparisons and disclosures under this agreement upon completion of the following requirements:

- OCSE and the authorized HUD officials sign the agreement;
- HUD and HHS Data Integrity Boards approve this matching agreement and HUD and HHS DIB Chairpersons sign the agreement;
- HUD submits the documentation required by OCSE to assess the HUD EIV System's security posture; and

- HUD reports the matching program to OMB and Congress for their advance review and, upon completion of OMB's advance review, HUD publishes the matching notice in the *Federal Register* for 30 days as required by 5 U.S.C. §§ 552a(e)(12), (o)(2)(A), and (r), and OMB Circular A-108, *Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act* (Dec. 23, 2016), at pages 17-23.

The parties may, within three months prior to the expiration date of this agreement, renew the agreement for a period of up to one year, as permitted by 5 U.S.C. § 552a(o)(2)(D). To renew a matching program OCSE and HUD must meet requirements of subsection q, which provides that no source agency may renew a matching agreement unless the recipient agency or non-federal agency has certified that it has complied with the provisions of that agreement and the source agency has no reason to believe that the certification is inaccurate. 5 U.S.C. § 552a(q)(2)(A) and (B).

OCSE and HUD anticipate the matching program will meet renewal requirements and will certify to the Data Integrity Boards in writing that the program has been conducted in compliance with the agreement and will be conducted without any significant change. *See* 5 U.S.C. § 552a(o)(2)(D) and OMB Circular A-108, *Federal Agency Responsibilities for Review, Reporting, and Publication under the Privacy Act* (Dec. 23, 2016), at pages 17-20.

B. Modification of the Agreement

This agreement may be modified at any time by a written amendment which is approved by HUD, OCSE, and by the Data Integrity Boards of each agency. If any significant changes are requested, a new agreement will be required.

C. Termination of the Agreement

This agreement may be terminated at any time with the consent of both agencies. Either agency may unilaterally terminate this agreement upon written notice to the other agency, in which case the termination date will be effective 90 days after the date of the notice or later as specified in the notice provided this date does not exceed the approved duration of the agreement.

If OCSE has reason to believe that the verification and opportunity to contest requirements of subsection (p) of the Privacy Act, or any other requirement of this agreement are not being met, OCSE will terminate disclosures of records contained in the NDNH under the agreement. 5 U.S.C. § 552a(q)(1).

If OCSE determines that any authorized entity to which NDNH information is redisclosed is not complying with any of the terms and provisions in this agreement, OCSE may terminate this agreement.

If OCSE determines that the privacy or security of NDNH information is at risk, OCSE may terminate the agreement and any further disclosures without prior notice to HUD.

Each agency will submit to its Data Integrity Board a copy of any notification of termination.

XIII. NECESSITY OF INFORMATION FOR AUTHORIZED PURPOSE

Subsection 453(j)(7)(B) of the Social Security Act requires HUD to seek minimum information only to the extent necessary to verify the employment and income of participants of specified programs. 42 U.S.C. § 653(j)(7)(B).

HUD will comply with such requirement by ensuring that the NDNH information requested, and the frequency of transmission and the retention and disposition of the NDNH information, are necessary to accomplish the authorized purpose for obtaining NDNH information – verifying the employment and income of participants of the specified programs. (*See* sections III.B, III.D, and VI.).

HUD may provide to each entity listed in sections VIII.E.1 and 2 only the specific NDNH information necessary to perform their official duties and to accomplish the purpose for obtaining NDNH information – verifying the employment and income of participants of the specified programs.

XIV. PERIODIC REPORTING OF PERFORMANCE OUTCOMES

The Office of Management and Budget requires OCSE to periodically report measures of the performance of the FPLS, including the NDNH, through various federal management devices, such as the Office of Management and Budget Information Technology Dashboard, the Annual Report to Congress, and the Major IT Business Case. OCSE is required to provide performance measures demonstrating how the FPLS supports OCSE's strategic mission, goals and objectives, and cross-agency collaboration. OCSE also requests such performance reporting to ensure matching partners use NDNH information for the authorized purpose.

To help OCSE in its compliance with federal reporting requirements, and to provide assurance that HUD uses NDNH information for the authorized purpose, HUD must provide OCSE with a written report describing the performance outputs and outcomes attributable to its use of NDNH information for the purposes stated in this agreement. The report will identify the estimate of the erroneous rental housing assistance payments attributable to tenant reporting of income that was determined through the comparison using NDNH information.

HUD will provide such reports, in a format determined by HUD and approved by OCSE, to OCSE on an annual basis, no later than three months after the end of each fiscal year of the matching program.

The reports may also help HUD in the development of a cost-benefit analysis of the matching program required for any subsequent matching agreements in accordance with 5 U.S.C. § 552a(o)(1)(B). *See* section II.B of this agreement.

XV. DISPUTE RESOLUTION

Disputes related to this agreement over financial or accounting issues must be resolved in accordance with instructions provided in the Treasury Financial Manual, Volume I, Appendix 5, *Overall Intra-Governmental Transactions Processes/General Information*, Section 2.3, or a superseding directive, available on the Treasury Financial Manual website at https://tfx.treasury.gov/sites/default/files/2024-03/Appendix-5-2-4700_0.pdf.

XVI. PERSONS TO CONTACT

A. The U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement contact for programs is:

Angela Kasey-Henry
Data Access Federal Oversight Manager
Division of Federal Systems
Office of Child Support Enforcement
Administration for Children and Families
Mary E. Switzer Building
330 C Street SW, 5th Floor
Washington, DC 20201
Phone: (202) 401-5568
Email: Angela.Kasey-Henry@acf.hhs.gov

B. The U.S. Department of Housing and Urban Development contacts are:

James (Rick) Graham
EIV System Owner
Office of Public and Indian Housing
400 W. Bay Street, Suite 1015
Jacksonville, FL 32202
Phone: (904) 599-2056
Email: james.graham@hud.gov

Abdul-Hasim Muhammad, IT Project Manager
FAC-P/PM (IT) Senior, FAC_COR Level 3, CSM®
Office of Chief Information Officer
OCIO – I.T. Project Manager
Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410
Phone: (301) 542-5215
Email: Boe.Muhammad@hud.gov

XVII. APPROVALS

By their signatures below, the authorized officials approve this agreement.

A. U. S. Department of Health and Human Services Program Official

ADAM B. NORMAN -S Digitally signed by ADAM B. NORMAN -S Date: 2026.04.27 15:16:43 -04'00'	
Adam Norman Commissioner Office of Child Support Enforcement	**Date**

B. U.S. Department of Health and Human Services Approving Official

Alex J. Adams	
Alex Adams Assistant Secretary Administration for Children and Families	**Date** May 18, 2026

C. U. S. Department of Health and Human Services Data Integrity Board

David C. Hong David C. Hong (Jun 30, 2026 11:40:26 EDT)	
Data Integrity Board Chair U.S. Department of Health and Human Services	**Date** 06/30/2026

D. U.S. Department of Housing and Urban Development Program Officials

HEIDI FRECHETTE Digitally signed by HEIDI FRECHETTE Date: 2026.05.27 12:12:08 -04'00'	
Heidi J. Frechette General Deputy Assistant Secretary Office of Public and Indian Housing	**Date**

PAUL OLIN Digitally signed by: PAUL OLIN DN: CN = PAUL OLIN C = US O = U.S. Government OU = Department of Housing and Urban Development Date: 2026.05.26 11:52:32 -04'00'	
Paul M. Olin Acting General Deputy Assistant Secretary for Housing	**Date**

E. U.S. Department of Housing and Urban Development Data Integrity Board

KIMBERLY MORTON Digitally signed by KIMBERLY MORTON Date: 2026.07.08 15:44:17 -04'00'	
Pricilla W. Clark Chairperson HUD Data Integrity Board	**Date**

SECURITY ADDENDUM

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Child Support Enforcement

and

U.S. Department of Housing and Urban Development

Verification of Employment and Income and Analysis

I. PURPOSE AND EFFECT OF THIS SECURITY ADDENDUM

The purpose of this security addendum is to specify the security controls that the Office of Child Support Enforcement (OCSE) and U.S. Department of Housing and Urban Development (HUD) must implement to ensure the confidentiality, integrity, and availability of federal systems data exchanged under this agreement. Federal systems data includes information maintained within the Federal Parent Locator Service (FPLS), such as the National Directory of New Hires (NDNH), the Debtor File (DF), the Federal Case Registry (FCR), and all associated applications and resources.

By signing this security addendum, OCSE and HUD agree to comply with the security and privacy requirements established by the U.S. Department of Health and Human Services and OCSE. Both parties agree to use federal systems data solely for authorized purposes in accordance with the terms of the computer matching agreement (agreement) between HUD and OCSE.

OCSE may update this security addendum to address process or technology changes, as well as new or revised federal security requirements and guidelines. In such instances, OCSE must provide HUD with written notification of such changes and require written assurance by HUD that it must comply with new or revised security requirements.

II. APPLICABILITY OF THIS SECURITY ADDENDUM

This security addendum is applicable to the agency, personnel, facilities, documentation, information, electronic and physical records, other machine-readable information, and the information systems of OCSE and HUD and HUD authorized entities specified in the agreement which are hereinafter “OCSE” and “HUD.”

III. SECURITY AND PRIVACY SAFEGUARDING REQUIREMENTS

The safeguarding requirements in this security addendum are drawn from the *Office of Child Support Enforcement Division of Federal Systems Security Requirements for Federal Agencies Receiving National Directory of New Hires Data*. This document is available upon request from ocsssecurity@acf.hhs.gov.

This section provides the safeguarding requirements with which OCSE and HUD must comply and continuously monitor. HUD must also comply with three additional requirements: Breach Reporting and Notification Responsibility; Security Authorization; and Audit Requirements.

The safeguarding requirements for receiving federal systems information as well as the safeguards in place at OCSE for protecting the agency input files are as follows:

1. HUD must restrict access to, and disclosure of, federal systems information to authorized personnel who need federal systems information to perform their official duties in connection with the authorized purposes specified in the agreement.

   OCSE restricts access to and disclosure of the agency input files to authorized personnel who need them to perform their official duties as authorized in this agreement.

   Policy/Requirements Traceability: 5 U.S.C. § 552a(b)(1), NIST SP 800-53 Rev 5, *Security and Privacy Controls for Information Systems and* Organizations, AC-3, AC-6

2. HUD must establish and maintain an ongoing management oversight and quality assurance program to ensure that only authorized personnel have access to federal systems information.

   OCSE management oversees the use of the agency input files to ensure that only authorized personnel have access.

   Policy/Requirements Traceability: 5 U.S.C. § 552a; NIST SP 800-53 Rev 5, PL-4(1), PS-6, PS-8

3. HUD must advise all authorized personnel who will access federal systems information of the confidentiality of the information, the safeguards required to protect federal systems information, and the civil and criminal sanctions for non-compliance contained in the applicable federal laws, including section 453(l)(2) of the Social Security Act. 42 U.S.C. § 653(l)(2).

   OCSE advises all personnel who will access the agency input files of the confidentiality of the information, the safeguards required to protect the information, and the civil and criminal sanctions for non-compliance contained in the applicable federal laws.

Policy/Requirements Traceability: 5 U.S.C. § 552a; HHS-OCIO-OIS-2020-02-002; NIST SP 800-53 Rev. 5, PL-4(1), PS-6, PS-8

4. HUD must deliver security and privacy awareness training to personnel with authorized access to federal systems information and the system that houses, processes, or transmits the information. The training must describe each user's responsibility for proper use and protection of federal systems information, how to recognize and report potential indicators of insider threat, and the possible sanctions for misuse. All personnel must receive security and privacy awareness training before accessing federal systems information and at least annually thereafter. The training must cover the matching provisions in 5 U.S.C. § 552a, and the federal laws governing use and misuse of federal systems information.

   OCSE delivers security and privacy awareness training to personnel. The training describes each user's responsibility for proper use and protection of other agencies' input files, how to recognize and report potential indicators of insider threat, and the possible sanctions for misuse. All personnel receive security and privacy awareness training before accessing agency input files and at least annually thereafter. The training covers the other federal laws governing use and misuse of protected information.

   Policy/Requirements Traceability: 5 U.S.C. § 552a; 44 U.S.C. § 3551 et seq; OMB Circular A-130, *Managing Information as a Strategic Resource*; OMB M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information;* NIST SP 800-53 Rev. 5, Awareness and Training (AT)-2(2), AT-3

5. HUD personnel with authorized access to federal systems information must sign nondisclosure agreements, rules of behavior, or equivalent documents before system access, annually, and if changes in assignment occur. The nondisclosure agreement, rules of behavior, or equivalent documents must outline the authorized purposes for which the HUD may use federal systems information, the privacy and security safeguards contained in this agreement and security addendum, and the civil and criminal penalties for unauthorized use. HUD may use "wet" and/or electronic signatures to acknowledge nondisclosure agreements, rules of behavior, or equivalent documents.

   OCSE personnel with authorized access to the agency input files sign nondisclosure agreements and rules of behavior annually.

   Policy/Requirements Traceability: OMB Circular A-130 – Appendix I, *Responsibilities for Protecting and Managing Federal Information Resources*; OMB M-17-12; NIST SP 800-53 Rev 5, PS-6

6. HUD must maintain records of authorized personnel with access to federal systems information. The records must contain a copy of each individual's signed nondisclosure agreement, rules of behavior, or equivalent document and proof of the

individual's participation in security and privacy awareness training. HUD must make such records available to OCSE upon request.

OCSE maintains a record of personnel with access to the agency input files. The records contain a copy of each individual's signed nondisclosure agreement, rules of behavior, or equivalent document and proof of the individual's participation in security and privacy awareness training.

Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AT-4

7. HUD must have appropriate procedures in place to report confirmed and suspected security or privacy incidents (unauthorized use or disclosure involving personally identifiable information), involving federal systems information. Immediately upon discovery, but in no case later than one hour after discovery of the incident, HUD must report confirmed and suspected incidents, in either electronic or physical form, to OCSE, as designated in this security addendum. The requirement for HUD to report confirmed or suspected incidents involving federal systems information to OCSE exists in addition to, not in lieu of, any HUD requirements to report to the Cybersecurity and Infrastructure Security Agency (CISA) or other reporting agencies.

   OCSE has appropriate procedures in place to report security or privacy incidents, or suspected incidents involving the agency input files. Immediately upon discovery but in no case later than one hour after discovery of the incident, OCSE will report confirmed and suspected incidents to the HUD security contact designated in this security addendum. The requirement for OCSE to report confirmed or suspected incidents to HUD exists in addition to, not in lieu of, requirements to report to CISA or other reporting agencies.

   Policy/Requirements Traceability: OMB Circular A-130 – Appendix I; OMB M-17-12; NIST SP 800-53 Rev 5, IR-6

8. HUD must prohibit the use of non-HUD furnished equipment to access federal systems information without specific written authorization from the appropriate HUD representatives.

   OCSE does not permit personnel to access the agency input files remotely using non-agency furnished equipment.

   Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AC-20(1)(2)

9. HUD must require that personnel accessing federal systems information remotely (for example, telecommuting) adhere to all the security and privacy safeguarding requirements provided in this security addendum. HUD and non-HUD furnished equipment must have appropriate software with the latest updates to protect against attacks, including, at a minimum, current antivirus software and up-to-date system patches and other software patches. Before electronic connection to HUD resources, HUD must scan the HUD and non-HUD furnished equipment to ensure compliance

with HUD standards. All remote connections must be through Network Access Control, and all data in transit between the remote location and HUD must be encrypted using FIPS 140-3 validated encryption standards. Personally owned devices must not be authorized. See numbers 8 and 19 of this section for additional information.

OCSE does not permit personnel to access the agency input files remotely using non-agency furnished equipment.

Policy/Requirements Traceability: OMB-M-17-12; NIST SP 800-53 Rev 5, AC-17, AC-20

10. HUD must implement an effective continuous monitoring strategy and program that must ensure the continued effectiveness of security controls by maintaining ongoing awareness of information security, vulnerabilities, and threats to the information system housing federal systems information. The continuous monitoring program must include configuration management, patch management, vulnerability management, risk assessments before making changes to the system and environment, ongoing security control assessments, and reports to HUD officials as required.

    OCSE has implemented a continuous monitoring strategy and program that ensures the continued effectiveness of security controls by maintaining ongoing awareness of information security, vulnerabilities, and threats to the information system housing the input files. The continuous monitoring program includes configuration management, patch management, vulnerability management, risk assessments before making changes to the system and environment, ongoing security control assessments, and reports to the U.S. Department of Health and Human Services officials as required.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, CA-7(1)(4); NIST SP 800-137, *Information Security Continuous Monitoring (ISCM) for Federal Information Systems and Organizations*

11. HUD must maintain an asset inventory of all software and hardware components within the boundary of the information system housing federal systems information. The inventory must be detailed enough for HUD to track and report.

    OCSE maintains an inventory of all software and hardware components within the boundary of the information system housing the agency input files.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, CM-2(3)(7), CM-7(1)(2)(4), CM-8(1)(3), CM-11, IA-3, PM-5, SA-4(1)(2)(9)(10), SC-17, SC-18, SI-4(2)(4)(5)

12. HUD must maintain a system security plan describing the security requirements for the system housing federal systems information and the security controls in place or

planned for meeting those requirements. The system security plan must describe the responsibilities and expected behavior of all individuals who access the system.

OCSE maintains a system security plan that describes the security requirements for the information system housing the agency input files and the security controls in place or planned for meeting those requirements. The system security plan includes responsibilities and expected behavior of all individuals who access the system.

Policy/Requirements Traceability: NIST SP 800-53 Rev 5, PL-2, NIST SP 800-18 Rev 1, *Guide for Developing Security Plans for Federal Information Systems*

13. HUD must maintain a plan of action and milestones (and when applicable, a corrective action plan) for the information system housing federal systems information to document plans to correct weaknesses identified during security control assessments and to reduce or eliminate known vulnerabilities in the system. HUD must update the plan of action and milestones (and when applicable, the corrective action plan) as necessary based on the findings from security control assessments, security impact analyses, and continuous monitoring activities.

    OCSE maintains a plan of action and milestones for the information system housing the agency input files to document plans to correct weaknesses identified during security control assessments and to reduce or eliminate known vulnerabilities in the system. OCSE updates the plan of action and milestones as necessary based on the findings from security control assessments, security impact analyses, and continuous monitoring activities.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, CA-5, NIST SP 800-18 Rev 1

14. HUD must maintain a baseline configuration of the system housing federal systems information. The baseline configuration must include information on system components (for example, standard software packages installed on workstations, notebook computers, servers, network components, or mobile devices; current version numbers and patch information on operating systems and applications; and configuration settings/parameters), network topology, and the logical placement of those components within the system architecture.

    OCSE maintains a baseline configuration of the information system housing the agency input files.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, CA-7, CA-9, CM-2(3)(7), CM-3(2), CM-5, CM-6, CM-7(1)(2)(4), CM-8(1)(3), CM-11, SI-4(2)(4)(5)

15. HUD must limit and control logical and physical access to federal systems information to only those personnel authorized for such access based on their official

duties, and identified in the records maintained by HUD under numbers 6 and 27 of this section.

HUD must prevent personnel from browsing by using technical controls or other compensating controls.

OCSE limits and controls logical and physical access to the agency input files to only those personnel authorized for such access based on their official duties. OCSE prevents browsing using technical controls that limit and monitor access to the agency input files.

Policy/Requirements Traceability: 5 U.S.C. § 552a; NIST SP 800-53 Rev 5, AC-2, AC-3

16. HUD must transmit and store all federal systems information provided under this agreement in a manner that safeguards the information and prohibits unauthorized access. All electronic HUD transmissions of information to HUD and entities specified in the agreement must be encrypted utilizing a FIPS 140-3 compliant product.

    HUD and OCSE exchange data via a mutually approved and secured data transfer method that utilizes a FIPS 140-3 compliant product.

    Policy/Requirements Traceability: OMB M-17-12; FIPS 140-3, *Security Requirements for Cryptographic Modules*; NIST SP 800-53 Rev 5, MP-4, SC-8

17. HUD must transfer and store federal systems information only on HUD owned portable digital media and mobile computing and communications devices that are encrypted at the disk or device level, using a FIPS 140-3 validated product. See numbers 8 and 18 of this section for additional information.

    OCSE does not copy the agency input files to mobile media.

    Policy/Requirements Traceability: OMB M-17-12; FIPS 140-3

18. HUD must prohibit the use of computing resources resident in commercial or public facilities (for example, hotels, convention centers, airports) from accessing, transmitting, or storing federal systems information.

    OCSE prohibits the use of computing resources resident in commercial or public facilities (for example, hotels, convention centers, airports) from accessing, transmitting, or storing the agency input files.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AC-19(5), CM-8(3)

19. HUD must prohibit remote access to federal systems information, except via a secure and encrypted (FIPS 140-3 compliant) transmission link and using two-factor authentication. HUD must control remote access through a limited number of managed access control points.

    OCSE prohibits remote access to the agency input files except via a secure and encrypted (FIPS 140-3 compliant) transmission link and using two-factor authentication.

    Policy/Requirements Traceability: OMB M-17-12; FIPS 140-3; NIST SP 800-53 Rev 5, AC-17, IA-2(6)(12), SC-8

20. HUD must maintain a fully automated audit trail system with audit records that, at a minimum, collect data associated with each query transaction to its initiator, capture date and time of system events and type of events. The audit trail system must protect data and the audit tool from addition, modification or deletion and should be regularly reviewed and analyzed for indications of inappropriate or unusual activity.

    OCSE maintains a fully automated audit trail system with audit records that, at a minimum, collect data associated with each query transaction with its initiator, capture date and time of system events and type of events. The audit trail system must protect data and the audit tool from addition, modification or deletion and should be regularly reviewed and analyzed for indications of inappropriate or unusual activity.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AU-2, AU-3, AU-6(1)(3), AU-8, AU-9(4), AU-11

21. HUD must log each computer-readable data extract (secondary store or files with duplicate federal systems information) from any database holding the information and verify that each extract has been erased within 60 days after completing authorized use. If HUD requires the extract for longer than 60 days to accomplish a purpose authorized pursuant to this agreement, HUD must request permission, in writing, to keep the extract for a defined period, subject to OCSE written approval. HUD must comply with the retention and disposition requirements in the agreement.

    OCSE does not extract information from the agency input files.

    Policy/Requirements Traceability: OMB M-17-12, NIST SP 800-53 Rev 5, MP-4, MP-6, SI-12

22. HUD must utilize a time-out function for remote access and mobile devices that require a user to re-authenticate after no more than 30 minutes of inactivity. See numbers 8, 9, and 19 of this section for additional information.

    OCSE utilizes a time-out function for remote access and mobile devices that requires a user to re-authenticate after no more than 30 minutes of inactivity.

Policy/Requirements Traceability: OMB M-17-12, NIST SP 800-53 Rev 5, AC-11, AC-12, AC-17, SC-10

23. HUD must erase electronic records after completing authorized use in accordance with the retention and disposition requirements in the agreement.

    OCSE erases the electronic records after completing authorized use in accordance with the retention and disposition requirements in the agreement.

    Policy/Requirements Traceability: 5 U.S.C. § 552a, NIST SP 800-53 Rev 5, MP-4, MP-6, SI-12

24. When storage media are disposed of, the media will be destroyed or sanitized so that the erased records are not recoverable.

    Policy/Requirements Traceability: 5 U.S.C. § 552a, NIST SP 800-53 Rev 5, MP-4, MP-6, SI-12

25. HUD must implement a Network Access Control (also known as Network Admission Control (NAC)) solution in conjunction with a Virtual Private Network (VPN) option to enforce security policy compliance on all HUD and non-HUD remote devices that attempt to gain access to, or use, federal systems information. HUD must use a NAC solution to authenticate, authorize, evaluate, and remedy remote wired and wireless users before they can access the network. The implemented NAC solution must evaluate whether remote machines are compliant with security policies through host(s) integrity tests against predefined templates, such as patch level, service packs, antivirus, and personal firewall status, as well as custom-created checks tailored for the HUD enterprise environment. HUD must disable functionality that allows automatic code execution. The solution must enforce security policies by blocking, isolating, or quarantining non-compliant devices from accessing the HUD network and resources while maintaining an audit record on users' access and presence on the HUD network. See numbers 8 and 19 of this section for additional information.

    OCSE ensures that personnel do not access the agency input files remotely using non-agency furnished equipment.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AC-17, AC-20, IA-2(6)(12), IA-3

26. HUD must ensure that the organization responsible for the data processing facility storing, transmitting, or processing federal systems information complies with the security requirements established in this security addendum. The "data processing facility" includes the personnel, facilities, documentation, data, electronic and physical records and other machine-readable information, and the information systems of HUD including, but not limited to, employees and contractors working

with the data processing facility, contractor data centers, and any other individual or entity collecting, storing, transmitting, or processing federal systems information.

OCSE ensures that the data processing facility complies with the security requirements established in this security addendum.

Policy/Requirements Traceability: NIST SP 800-53 Rev 5, SA-9(2)

27. HUD must store all federal systems information provided under this agreement in an area that is physically safe from access by unauthorized persons during duty hours as well as non-duty hours or when not in use.

    OCSE stores the agency input files provided under this agreement in an area that is physically safe from access by unauthorized persons during duty hours as well as non-duty hours or when not in use.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, PE-2, PE-3

28. HUD must maintain a list of personnel authorized to access facilities and systems processing sensitive data, including federal systems information. HUD must control access to facilities and systems wherever federal systems information is processed. Designated officials must review and approve the access list and authorization credentials initially and periodically thereafter, but no less often than annually.

    OCSE maintains lists of personnel authorized to access facilities and systems processing the agency input files. OCSE controls access to facilities and systems wherever the agency input files are processed. Designated officials review and approve the access list and authorization credentials initially and periodically thereafter, but no less often than annually.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, AC-2, PE-2

29. HUD must label printed reports containing federal systems information to denote the level of sensitivity of the information and limitations on distribution. HUD must maintain printed reports in a locked container when not in use and must not transport federal systems information off HUD premises. When no longer needed, in accordance with the retention and disposition requirements in the agreement, HUD must destroy these printed reports by burning or shredding.

    OCSE does not generate printed reports containing the agency input files.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, MP-2, MP-3, MP-4, MP-5, MP-6

30. HUD must use locks and other protective measures at all physical access points (including designated entry and exit points) to prevent unauthorized access to computer and support areas containing federal systems information.

    OCSE uses locks and other protective measures at all physical access points (including designated entry/exit points) to prevent unauthorized access to computer and support areas.

    Policy/Requirements Traceability: NIST SP 800-53 Rev 5, PE-3

IV. BREACH REPORTING AND NOTIFICATION RESPONSIBILITY

Upon disclosure of federal systems information from OCSE to HUD, HUD is the responsible party in the event of a confirmed or suspected breach of the information, including responsibility for any costs associated with breach mitigation and remediation. Immediately upon discovery, but in no case later than one hour after discovery of the incident, HUD must report confirmed and suspected incidents, in either electronic or physical form, to the OCSE security team. Incident reporting contact information is contained in section IX of this security addendum. HUD is responsible for all reporting and notification activities, including but not limited to: investigating the incident; communicating with Cybersecurity and Infrastructure Security Agency (CISA); notifying individuals whose information is breached; notifying any third parties, including the media; notifying any other public and private sector agencies involved; responding to inquiries about the breach; responding to Congressional inquiries; resolving all issues surrounding the information breach; performing any follow-up activities; correcting the vulnerability that allowed the breach; and any other activity as required by OMB M-17-12, *Preparing for and Responding to a Breach of Personally Identifiable Information*, and other federal law and guidance.

Policy/Requirements Traceability: *US-CERT Federal Incident Notification Guidelines* (April 1, 2017); OMB Circular A-130 – Appendix I; OMB M-17-12; NIST SP 800-53 Rev. 5, IR-6

V. CLOUD SOLUTION (OPTIONAL)

HUD may choose to use cloud computing to distribute services over broader architectures. HUD must leverage vendors and services only when all federal systems information physically resides in systems located within the United States and all support and services of the system that may facilitate federal systems access must be done from the U.S., its possessions, and territories.

The cloud service provider must be Federal Risk and Authorization Management Program (FedRAMP) certified in order to meet federal security requirements for cloud-based computing or data storage solutions. Cloud implementations are defined by the service model and deployment model used. Software as a Service, Platform as a Service, and Infrastructure as a Service are examples of cloud service models for cloud implementation. The deployment models may include private cloud, community cloud, public cloud, and hybrid cloud. Data security

requirements as defined below still must be met regardless of the type of cloud implementation chosen.

1. The cloud-based solution must reside on a FedRAMP compliant system. FedRAMP is a government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services.

2. Use of a cloud solution must be approved in advance by OCSE at least 45 days before connectivity to federal systems information and confidential child support program information can be established. States that have already established a cloud solution housing federal systems information must send official notification of this major change to OCSE.

3. Federal systems information must be encrypted in transit, to, from, and within the cloud environment. All mechanisms used to encrypt federal systems information must use FIPS 140-3 validated modules. Adequate logging controls must be in place to determine key changes and access.

4. HUD must provide the physical address of the cloud provider/data center where FPLS information will be received, processed, stored, accessed, protected and/or transmitted.

5. Software and/or services that receive, transmit, process, or store federal systems information, must be isolated within the cloud environment, so other cloud customers sharing physical or virtual space cannot access other customers information or applications,

6. Any storage devices where federal systems information has resided, must be securely sanitized and/or destroyed using methods acceptable by the National Institute of Standards and Technology (NIST).

7. HUD must implement sufficient multifactor authentication for accessing their cloud environment including cloud management console(s) and systems within the cloud environment.

8. HUD and the cloud service provider must comply with all requirements in this agreement, including the security addendum, including the data retention policies agreed upon by the HUD and OCSE to ensure that all required statutory requirements are met. The HUD must ensure such compliance by the cloud service provider.

9. The data stored by the cloud service provider should ONLY be used for the authorized purpose of the matching program.

10. It is the obligation of HUD to ensure that the cloud solution that houses the federal systems information and confidential child support program information is stored domestically and is specified in the contract or Service Level Agreement between HUD and the cloud service provider.

VI. SECURITY AUTHORIZATION

OCSE requires systems that process, transmit or store federal systems information to be granted authorization to operate following the guidelines in NIST 800-37 Revision 2, *Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy*.

A. HUD Security Posture

OCSE requires HUD to demonstrate its security posture before receiving federal systems information and periodically thereafter, by providing a copy of the Authorization to Operate (ATO) for the HUD environment that will house federal systems information on HUD premises. An ATO serves as an attestation that security is integrated into the system and remains persistent throughout the approval timeline via technical, management, and continuous monitoring controls. The ATO also affirms HUD will conclude remediation of vulnerabilities addressed in a Plan of Actions and Milestones (POA&Ms). To support the ATO and demonstrate sustained compliance, HUD implements a comprehensive set of security controls across three domains: technical, management, and continuous monitoring. These controls collectively ensure that federal systems data remains protected throughout the system lifecycle and that any identified risks are promptly addressed. The following summaries outline the core safeguards in each category:

Technical Controls Summary

- Access Control
- Data Encryption
- Security Software
- Configuration Management

Management Controls Summary

- Security Policy
- Risk Management
- Training and Awareness
- Monitoring and Logging
- Incident Response

Continuous Monitoring Controls Summary

- Identification and Remediation of new vulnerabilities
- Plan of Action and Milestone (POA&M) remediation

The HUD ATO is effective until November 12, 2026. OCSE considers this evidence that the HUD environment complies with the security requirements in this security addendum (which include technical, management and continuous monitoring controls applied and maintained throughout the ATO period).

The effective period for an ATO is one year. HUD must provide a signed ATO letter whenever the ATO signature date on file with OCSE expires during this agreement. Failure to provide an

updated ATO may result in the termination of this agreement. Additionally, OCSE reserves the right to verify if the compensating controls, updated vulnerability remediation results, and updated POA&Ms meet the HUD standard during the agreement period of the ATO. Failure to meet the required objectives may result in suspension of data flow until compliance with all stated objectives of the ATO are completed.

HUD is only authorized to process, transmit, and store federal systems information in the HUD environment and premises.

2. HUD Permitted Entity Security Posture

Before the redisclosure of NDNH information by HUD to any entity authorized pursuant to 453(j)(7)(E)(iv)(II) and specified within the agreement, HUD must demonstrate, and OCSE must review and approve, the security posture of the entity's systems and processes.

All information systems and applications that process, transmit or store federal systems information must fully comply with FISMA, OMB directives, and NIST guidelines.

Before receiving federal systems information, entities must have implemented the minimum-security controls required for a system categorized as "moderate" in accordance with FIPS 199.

All systems and applications handling federal systems information must first be granted the ATO through the authorization process according to NIST SP 800-37 Revision 2. In addition, if applicable, federal agencies that share federal systems information with entities specified in the agreement must ensure the specified contractors meet the same safeguarding requirements. The authorizing official of the agency that re-discloses federal systems information to the permitted entity may grant them the ATO or security authorization.

The security authorization process must have been conducted according to the NIST SP 800-37 Revision 2, as appropriate.

Federal agencies must comply with NIST SP 800-37 Revision 2, including implementing a continuous monitoring program for permitted entities. Agencies must conduct the authorization process at least every three years or when there are major changes to a system. Agencies must verify privacy protection periodically through audits and reviews of the systems and procedures.

By signing the security addendum, HUD signatories confirm that HUD has reviewed the entities specified in the agreement, reviewed the security controls in place to safeguard information and information systems and has determined that the risk to federal data is at

an acceptable level. The security controls in place at all entities specified in the agreement are commensurate with those of a federal system categorized as "moderate" according to FIPS 199. *See also***:** OMB M-25-04, *Fiscal Year 2025 Guidance on Federal Information Security and Privacy Management Requirements*, January 15, 2025.

VII. AUDIT REQUIREMENTS

Section 453(j)(7)(E)(ii) and (iv)(II) of the Social Security Act provides that the disclosure of federal systems information to HUD and additional authorized entities is conditioned upon the disclosure being subject to audit in a manner satisfactory to the Secretary of Health and Human Services. 42 U.S.C. § 653(j)(7)(E)(ii) and (iv)(II).]

Policy/Requirements Traceability: *OMB* M-25-04, Fiscal Year 2025 Guidance on Federal Information Security and Privacy Management Requirements, January 15, 2025; OMB Circular No. A-130 – Appendix I

VIII. PERSONS TO CONTACT

A. The U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement contact is:

Venkata Kondapolu, Director
Division of Federal Systems
Office of Child Support Enforcement
Administration for Children and Families
Mary E. Switzer Building
330 C Street, SW, 5th Floor
Washington, DC 20201
Phone: 202-260-4712
Email: Venkata.kondapolu@acf.hhs.gov

B. Incident Reporting contact information for the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Child Support Enforcement is:

OCSE Security Team
Phone: 202-401-9389, option 3
Email: ocsssecurity@acf.hhs.gov

C. The Housing and Urban Development contacts is:

Dr. James L. Travis
Chief Information Security Officer
OCIO | Office of the Chief Information Security Officer (OCISO)
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 4278
Washington, DC 20410
Phone: 703-585-2918
Email: James.L.Travis@hud.gov

IX. APPROVALS

By their signatures below, the authorized officials approve this security addendum.

A. U.S. Department of Health and Human Services Officials

Venkata Kondapolu -S Digitally signed by Venkata Kondapolu -S Date: 2026.04.15 16:03:11 -04'00'	
Venkata Kondapolu Director Division of Federal Systems Office of Child Support Enforcement	**Date**
ADAM B. NORMAN -S Digitally signed by ADAM B. NORMAN -S Date: 2026.04.27 15:17:07 -04'00'	
Adam Norman Commissioner Office of Child Support Enforcement	**Date**

B. U.S. Housing and Urban Development

JAMES TRAVIS Digitally signed by: JAMES TRAVIS DN: CN = JAMES TRAVIS C = US O = U.S. Government OU = Department of Housing and Urban Development, Office of the Chief Information Officer Date: 2026.05.27 13:25:56 -04'00'	
Dr. James Travis Chief Information Security Officer	**Date**

APPENDIX A

Previous Computer Matching Agreements, Evaluation, and Other Agreements Between OCSE and HUD

Previous matching agreements and renewals, a legislatively required evaluation, and other agreements conducted between OCSE and HUD are as follows:

1. Computer Matching Agreement and Renewal "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 2315, effective March 9, 2024, through September 8, 2026.
2. Computer Matching Agreement and Renewal "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 2107, effective August 28, 2021, through February 27, 2024.
3. Computer Matching Agreement and Renewal "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1814, effective January 28, 2019, through July 27, 2021.
4. Computer Matching Agreement and Renewal "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1513, effective April 25, 2016, through October 24, 2018.
5. Computer Matching Agreement, Renewal and Amendment, "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1304, effective March 16, 2015, through March 15, 2016.
6. Computer Matching Agreement, "Verification of Employment and Income and Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1304, effective September 16, 2013, through March 15, 2015.
7. Computer Matching Agreement, Renewal and Amendment, "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1008 effective August 4, 2012, through August 3, 2013.
8. Computer Matching Agreement, "Verification of Employment and Income and Reduction and Measurement of Improper Payments," HHS DIB Approval No. 1008, effective February 4, 2011, through August 3, 2012.
9. Computer Matching Agreement, Renewal and Amendment, "Verification of Employment and Income Reduction and Measurement of Improper Payments," HHS DIB Approval No. 0802, effective January 6, 2010, through January 5, 2011.
10. Computer Matching Agreement, "Verification of Employment and Income and Reduction and Measurement of Improper Payments," HHS DIB Approval No. 0802, effective July 6, 2008, through January 5, 2010 (superseded previous matching agreement).
11. Computer Matching Agreement, "Verification of Eligibility for Benefits for HUD Multifamily Housing Programs," HHS DIB Approval No. 0703, effective December 11, 2007, through June 11, 2009.
12. Memorandum of Understanding, "Measurement of Improper Payments," August 15, 2007.
13. Computer Matching Agreement, Renewal, "Verification of Eligibility for HUD Housing Programs," HHS DIB Approval No. 0509, effective March 29, 2007, through March 28, 2008.

14. Computer Matching Agreement, "Verification of Eligibility for HUD Housing Programs," HHS DIB Approval No. 0509, effective July 12, 2005, through March 28, 2007.
15. "Evaluation, The Cost and Benefits and the Adequacy of Safeguarding Measures: Comparisons of Information in the National Directory of New Hires and Information in the Custody of the Department of Housing and Urban Development," May 2007.
16. Memorandum of Understanding, "Measurement of Improper Payments," September 2006.
17. Memorandum of Understanding, "Measurement of Improper Payments," March 2005.
18. Memorandum of Understanding, "Measurement of Improper Payments," June 2004.

APPENDIX B

Cost-Benefit Analysis

U.S. Department of Housing and Urban Development – National Directory New Hires Computer Matching Program

Verification of Employment and Income and Analysis

BACKGROUND:

HUD and HHS have entered into a Computer Matching Agreement (CMA), for the purpose of verifying the employment and income information of certain participants HUD rental assistance programs, since 2005. Each month, HUD sends a file containing records of adult individuals from the Office of Public and Indian Housing's Inventory Management System (IMS) and the Office of Multifamily Housing's Tenant Rental Assistance Certification System (TRACS) to the HHS Office of Child Support Enforcement for comparison against new hire, quarterly wage, and unemployment insurance data maintained in the National Directory of New Hires (NDNH). The outcomes of the comparison are uploaded into the HUD Enterprise Income Verification System (EIV), after third-party verification, and may be used by authorized EIV system users that administer certain rental housing assistance programs to measure income discrepancies between what is voluntarily reported by a family receiving HUD rental assistance against what is reported in the NDNH. Using the NDNH data is critical when validating tenant reported income during family interim and annual reexaminations.

The NDNH computer matching program allows the EIV System to provide a wide variety of verification reports which summarize, compare, and project tenant household income and identify tenants with income discrepancies and/or unreported income. Additionally, NDNH data assists the EIV System with identifying tenants who have started a new job, tenants who may be receiving multiple benefits and applicants who may already be receiving HUD rental assistance. The EIV reports are used by Public Housing Agencies (PHAs), Owners/Agents (O/As) and HUD Headquarters (HQ), Field Office (FO) personnel and Office of Inspector General investigators and auditors who monitor EIV data and review the performance of PHAs and O/As. In addition to this, MF Housing provides oversight by performance-based contract administrators (PBCAs) and traditional contract administrators (TCAs) who also use the EIV System reports.

Also, using the EIV System integrated with NDNH data streamlines the income verification process which results in less administrative burden in complying with third party verification requirements. Which in turn will benefit PHAs, tenants, taxpayers, and applicants by ensuring that the level of benefits provided on behalf of families is proper and will prevent fraud, waste, and abuse within HUD subsidized housing programs. Use of the EIV System by PHAs, owners, management agents, and contract administrators became mandatory effective January 31, 2010.

HUD's rental housing assistance programs are administered on behalf of HUD by third-party program administrators, including PHAs, public and private project owners, and contracted management agents. In the programs examined, eligible tenants are generally required to pay 30

percent of their adjusted income toward shelter costs (rent plus utilities), with HUD subsidizing the balance of the rental payment. New program applicants are required to provide certain information on household characteristics, income, assets, and expenses that is used to determine what rent they should pay. Existing tenants are required to recertify this information annually and, also, in some circumstances, when there are significant changes in household income or family composition. Applicant or tenant failure to correctly report income may result in HUD's over or underpayment of housing assistance. The failure of the program administrator responsible to correctly interview the tenant or process and calculate the tenant's rental assistance may also result in HUD's over or underpayment of housing assistance.

COSTS

Key Element 1: Personnel Costs

For Agencies

- **Source Agency** – N/A
- **Recipient Agency** - Staffing for EIV is made up of 3 full-time government staff dedicated to working with the EIV System and the report information contained within. Approximately $1.03 million can be attributed to Personnel/Staff Costs for the 30-month duration of this CMA. All staff salaries vary according to actual step levels, estimate based on GS-13 Step 5 for all personnel staffing HUD EIV. Definitive Contract for IT Outsourcing awarded in FY2023 (3-Year Duration) currently in its final option year has a ceiling value of $4.5 million.

Staffing	# of Staff	Position	Total
EIV	3	GS-13	$414,072 x 2.5 years = $1,035,180.00
Total Year 1			$414,072 (year1)
Total Year 2			$414,072 (year 2)
Total 6-Months			$207,036 (6-Months)
Cumulative EIV Staff Salaries: 30-month CMA **Total 2.5 Years**		$414,072 x 2.5 years	**$1,035,180.00**
Contract for IT Outsourcing (3-year Duration)			**$4,500,000.00**
HUD's Data Access and User Fees 2.5 Years		FY25:$1,205,000.00 FY26: $1,354,000 FY27 (6 mo. est): $744,500	**$3,303,500.00**
TOTAL			**$8,838,680.00**

- Justice Agencies – NA

For Clients – N/A
For Third Parties – N/A
For General Public – N/A

Key Element 2: Agencies' Computer Costs

To Agencies

- **Source Agency** - N/A
- **Recipient Agency** - HUD's Computer Cost is approximately $1,205,000.00, (per year with a slight increase each fiscal year), totaling approximately $3.3 million for the 30-month duration of this CMA. This amount is a combination of various access and user fees that are paid for HUD's use of the records during data matching. There is no other outside public agency fee involved with this matching agreement. There is also no charge for external use to HUD's stakeholders who administer HUD's rental assistance programs.
- **Justice Agencies – N/A**

To Clients – N/A
To Third Parties – N/A
To General Public – N/A

BENEFITS

Key Element 3: Avoidance of Future Improper Payments

To Agencies

- **Source Agency –** N/A
- **Recipient Agency** - The primary category of improper payments within HUD's rental programs takes the form of either overpayments or underpayments to rental recipients. Timely and current data is critical to accurately assess the veracity of income reported by rental applicants.

  Trending analyses were used to provide a national estimate of the subsidy cost to HUD resulting from assisted housing tenants who intentionally misreport their income. During FY 2025, HUD identified over $5.8 billion in questionable payments, which included 165,000 households receiving assistance despite having incomes above local limits. This lack of oversight and data matching with modern systems has resulted in a failure to provide a compliant estimate of improper payments since 2016, a period during which $315 billion was disbursed with limited verification of tenant income. This is estimated to have resulted in approximately $2.5 billion in overpayments to rental recipients in FY2025 if not for the data matching with NDNH[1]. With an estimated $4.04 million in Personnel and Computer Costs in FY2025, this represents a return of over 600:1.

  For this analysis it was assumed that there was no underlying pattern of behavior in a time series for the past several years. Therefore, the trend was assumed to be linear. It is assumed that the factors formerly impacting a data point may no longer be doing so to the same extent for the current analysis. This means that the extrapolation of the historical time series will not necessarily yield a valid prediction of the future but given the data available it provides a viable estimate.

[1] https://www.hud.gov/sites/dfiles/CFO/documents/afr2025.pdf

Utilizing the NDNH data provided by HHS allows HUD the ability to develop a risk-based assessment of housing agency performance of intake processing protocols that could lead to a change in policies or procedures. This can also lead to more accurate tenant assessments through either threats of sanctions or by establishing corrective action plans. HUD can also establish a methodology to extrapolate and estimate error rates across housing agencies based on size and demographics.

Benefits of the computer matching program for HUD include:

1. Reducing improper payments in accordance with Executive Order 13520, issued on November 20, 2009, and the Improper Payments Elimination and Recovery Act of 2010, enacted on July 22, 2010.
2. Protecting America's Bank Account Against Fraud, Waste, and Abuse in accordance with Executive Order Executive 14249, issued on March 25, 2025.
3. Increasing the availability of rental subsidies to individuals who meet the requirements of the housing assistance programs.
4. Determining the appropriate level of rental subsidies.
5. Identifying and recovering overpayments of rental subsidies.
6. Deterring future abuses in rental subsidy programs.
7. Ensuring that only valid tenants receive rental assistance; and
8. Reduced administrative costs associated with manual verifications.

- **Justice Agencies –** N/A

To Clients – Using the NDNH data as an upfront income verification technique is valuable in validating tenant-employment, and tenant reported income as well as streamlining the PHAs income verification process. This results in less administrative burden in complying with third party verification requirements. Additionally, NDNH information will help to identify and cure inaccuracies in housing subsidy determinations and reduce administrative and subsidy payment errors which in turn will benefit both PHAs, tenants and taxpayers.

To General Public – Via the HUD-HHS CMA, HUD-REAC's ability to use NDNH data is an invaluable tool for taxpayers, applicants/program participants, and housing program administrators. This data has assisted HUD with ensuring that limited Federal resources are available to serve as many eligible families as possible by reducing the high incidence of tenant un-reporting and/or underreporting of income and has identified program errors which improves the integrity and accuracy of rent calculations and tenant subsidy determinations made by PHAs and Multifamily Housing O/A's. In addition, avoidance of improper payments allows more available funding and opportunities for very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market.

Key Element 4: Recovery of Improper Payments and Debts Owed

- **Source Agency –** N/A
- **Recipient Agency** – HUD's Office of Public and Indian Housing also uses the Enterprise Income Verification (EIV) System in the recovery of Improper Payments and for PHA

maintenance of the Debts Owed Module. The Debts Owed Module is used to record and maintain a national repository of debts owed and adverse information to Public Housing Agencies (PHAs) and Section 8 landlords. It is a repository of adverse information of former tenants/program participants who have voluntarily or involuntarily terminated participation in one of the above-listed HUD rental assistance programs. At the conclusion of any family's rental assistance participation, HUD requires PHAs to collect and record any debt owed by the family (all members 18 years of age and older) and report any adverse information that may have aided in the termination of the family or household member. With this, PHA's are required to record:

- Amount of any balance a family owes the PHA or Section 8 landlord (up to $500,000) and provide an explanation for balance owed (i.e., unpaid rent, retroactive rent (due to unreported income and/ or change in family composition) or other charges such as damages, utility charges, etc.); and
- Whether or not the family has entered into a repayment agreement for the amount owed the PHA; and
- Whether or not the family has defaulted on a repayment agreement; and
- Whether or not the PHA has obtained a judgment against the family; and
- Whether or not the family has filed for bankruptcy; and
- The negative reason(s) for the family's end of participation or any negative status (i.e., abandoned unit, fraud, lease violations, criminal activity, etc.) as of the end of participation date.

Debts Owed and Termination information is maintained in the EIV System for a period of up to ten (10) years from the end of participation date or such other period consistent with State Law. HUD Program Administrators will have access to this information during the time of application for rental assistance and for use during mandatory reexamination of family income and composition. With use of the EIV Debts Owed module, PHAs will be alerted of an applicant's prior program history, may it be a debt owed (in any state or U.S. territory) or negative information which led to the family's termination, when the family voluntarily or involuntarily exited the program. This information may be used to determine a family's suitability for initial or continued rental assistance and to assist with the avoidance of providing limited Federal housing assistance to families who have previously been unable to comply with HUD program requirements. If the reported information in the EIV Debts Owed Module is verified as accurate, in accordance with 24 CFR 982.552 (c), (v), (vi), (vii) program administrators have the discretion to terminate current rental assistance participants or deny future request for HUD rental assistance, in accordance with HUD Regulations and the PHA's established administrative policies. Since applicants and tenants are required to sign an EIV Debts Owed to Public Housing Agencies and Terminations form HUD 9886, acknowledging that the PHA provided them the Debts Owed to PHAs and Termination's notice, use of the NDNH information via this CMA has assisted HUD with pursuing a "good citizen" program with its rental recipients. By informing applicants and participants of the EIV data, where it comes from and how it will be used, this has assisted many applicants and program participants to abide with the rules by correctly reporting income and household composition.

Recapture audits are conducted at least annually based on the payment history to the housing agencies. Depending on other risk factors, they are also conducted on an ongoing basis for selected housing agencies. Recovery of any overfunded payments to housing agencies can take place monthly if necessary. In egregious situations program administrators may not have their annual contribution contract renewed or may be forced to merge with another, better organized program administrator in their service area.

- **Clients and General Public** - HUD's EIV Staff provides monitoring efforts to confirm PHA compliance with PIC reporting requirements, the recovery of improper payments and the effective use of the EIV system and NDNH data to reduce improper payments. Although not all improper payments are fraud, and not all improper payments represent a loss to the government, recovery efforts inform American citizens that their tax dollars are being spent as efficiently and effectively as possible by the Federal government. HUD estimates that use of the NDNH data has identified programs susceptible to significant improper payments and has saved an estimated $207,800,000 to PHA administered HUD rental housing programs. By identifying and measuring improper payment issues and determining the root causes of error, HUD and its PHA partners can focus its resources so that corrective action plans can be thoughtfully developed and successfully carried out. The information in EIV is also used by HUD, HUD's Office of Inspector General (OIG), and auditors to ensure program participants and administrators comply with HUD rules.

HUD's Improper Payment Reduction Forecast

HUD will continue to take aggressive steps to address the causes of improper rental housing assistance payments to ensure that the right benefits go to the right people as well as address known causes and levels of improper payments. In addition, PIH has implemented additional functionalities within the EIV System and has a team dedicated to monitoring PHA progress and compliance in all risk factors measured by and associated with the EIV System. This effort will result in documenting the occurrence of improper payments and HUD's recovery thereof. Overall, the purpose of EIV is to identify and prevent fraud within HUD rental assistance programs, so that limited taxpayer's dollars can assist as many eligible families as possible. With the continued use of NDNH data via the CMA, EIV will help to improve the integrity of HUD rental assistance programs.

APPENDIX C

HUD Forms - Release of Information

Control l'iumber: 2577-0295

Use this form/or reexaminations effecti,,e on or after January I, 2024. Use form HUD-9886 for ree.,;wninations effective prior to January I, 2024.

Authorization for the Release oflnfonnation/Privacy Act Notice to the LS. Department of Housing and l"rban Denlopment and the Housing Agency/Authority (IIA)

U.S. Department of Housing and Crban Development, Office of Public and Indian Housing

PHA or IHA requesting release of information (full address, name of contact person, and date):

Authority: Section 9(14 of the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by Section 903 of the Housing rrnd Community Development *1\ct* of 1992 and Section 3003 of the Omnibus Budget Reconciliation Act of 1993. This law is found at 42 U.S.C. 3544. This law requires you to sign a consent form authorizing: (1) HUD, and the Housing Agency/1\ulhority (HA) to request verification of salary and wages from current or previous employers; (2) HUD and the HA to request wage and unemployment compensation claim mrormation rrnm the slate agency responsible for keeping that information; and (3) HlTJ to request certain tax return information from the CS Social Security i\dm inislrn(ion and the U.S. Internal Revenue Service.

Section 104 of the Housing Opportunity and Modernization Act of 2016. The relevant provisions are fouml al 42 L.S.C. 143711 This law requires yon to sign a consent form authorizing the HA to request verification of any financial record from any financial inslltutions as defmed 111 the Right to Financml Pnvucy Act (12 USC 3401)), whenever the HA determines the record is needed to determine an applicant's or participant's eligibility for assistance or level or bener1ts.

Purpose: In signing this consent rcmn, you are au!hori,ing Hlm and the above-named HA to request income information from the sources listed on the fonn. HLTJ and the HA need this information to venfy your household's income, in order to ensure that you are eligible for assisted housing ocnefits and that these benefits arc set at the correct level. HUD and the HA may participate in computer matching programs with these sources in order to verify your eligibility and level of benefits

Uses of Information to be Obtained: IIUD is required to protect the income information itobtams m accordance with the Privacy Act of 1974, 5 CS *C.* 552a. HUD may disclose information (other than tax return information) for certain routine uses, such as to other government agencies for law enforcement purposes, to Federal agencies for employment suitability purposes and to HAs for the purpose of determining housing assistance. The !IA. is also required to protect the income information it obtains in accordance with any applicable State privacy law HUD and HA employees may be subject to penalties for unauthorized disclosures or improper uses of the income informat10n that is obtamed based on the consent form **Private owners may not request or receive information authorized by this form.**

Who Must Sign the Consent Form: Each member of your family who is 18 years of age or older must sign the consent form. ;\dd11!onal signrrtures must he ohtamed from new adult memhers Joimng the family or whenever members of the family become 18 years of age.

Persons who apply for or receive assistance under the following programs are required to sign this consent form:

Pubhc Housmg
Ilousing Choice Voucher
Section 8 MD<lemle Rehah1liu1tion

Failure to Sign Consent Form: Your failuTe to sign the consent form may result in the denial of eligibility or tcrmmation of assisted housing benefits, or both. Denial of eligibility or tennination of benefiLs is suh_1ect to the HA's grievance procedures and Section 8 infom1al hearing procedures.

Revocation of consent: If you revoke consent, the PIIA will be unable to verify your information, although the data matches between HUD and other agencies will continue to automatically occm in the Enterprise Income Verification (EIV) System if the family is not lerm inated from the program

Sources ol Information to be Obtained

State Wage Informat1011 Collection Agencies (This consent is limit♦d Lo wages and unemploym♦nt compensation l have received when I have received assisted housing benefits.)

C.S. Social Security Administration (HUD only) (This consent is !unitecl to the wage and self-employment information and payments of ret!fement mcome as referenced at Section 6103(1)(7)(1\) of the Internal Revenue Code.)

CS. Internal Revenue Service (HUD only) (This consent is limited to unearned mcome [i.e., interest and dividends].)

Information may also be obtamecl directly from: (a) current and former employers concerning salary and wages; and (b) financial institutions as defined in the Right to foinancial Privacy Act (12 C.S.C. 3401), whenever the HA determines the record is needed to ,lelem1ine an apphcant"s or parlic1panl's d1g1bihty for assistance or level of benefits. I understand that income information obtained from these somces will be used to verify information that I provide m determining ehgih!l1ty for assisted housing programs and the level of benefits. Therefore, this consent form only authorizes release directly from employers and financial institutions of mfonnation

Original is retained by the requesting organizatioo. **ref.** Handbooks 7420.7, 7420.8, &. 7465.1 form HUD-9886-A (10123) exp. 10131126

Com,ent: I consent to allow HlJ[) or the HA to request and obtain income inf"ormation t"rom the sources listed on this l'orm f"or **the purpose of verifying my eligibility and level of bmefits under HlJIJ's assisted housing programs. I understand that HAs that receive income information under this consent form cannot use it to deny, reduce or terminate assistance "·ithout first independently verifying what the amount was, whether T actuully had access to the funds and when the funds were received. Tn addition, I must be given an opportunity to contest those determinations.**

This consent form remains effective until the earliest of (1) the rendering of a final adverse decision for an assistance applicant: (ii) the cessation of a participant" s eligibility for assistance from HLTI and the PHk or (iii) The express revocation by the asRtsrnnce appltcam or recipient (or applicable family member) of the authonzatton, in a wntten nottftcation to HUD or the PHA.

Slgnatu res:

Head of Household	Date		
Socia.l Security Number (ifa.ny) of Head of Household		Other Family Member over age 18	Date
Spou::.e	Date	Other Family Msmber over age 18	
Other Family Member over age 18	Date	Other Family Member over age 18	Date
Other Family Member over age 18	Date	Other Family Member over age 18	Date

Privacy Adviso1-y. Authority: The Department of Housing and Urban Development (HUD) is authorized to collect this information by the U.S Housing Ad ,,f 1937 (42 U.S.C:. 143⁷ el. seq.), Title VI ,,fthe Civil Rights Ad ,,f 1964 (42 U.S.C. 2000d), "nd by Ute F.♦r Hu using Ad (42 U.S.C. 3601-19). Purpose: This form authorizes HUD and the above-named HA to request income information to verify your household's income in order to ensure that you are eligible for assisted housing benefits and that these benefits are set at the correct level. Failure to provide any of the requested informatim may result in a delay or rejection of your eligibility approval

Penalties for Misusing this t:onsent: HUI) and the HA (or any employee of HUI) or the HA) may be subject to penalties for unauthorize,L disclosures or improper uses ofmformation collected based on the consent form Use of the info1mation collected based on the form HUD 9886 is restricted t0 the purposes cited m the form HUD 9886. lVlyperson who knowingly or willfolly requests, obtains, or discloses any information w1der false pretenses concerning an applicant or participant may be subject to a misdemeanor and fined not more than $5,000. A.ny applicant or parttcip,,nt affected by negligent disclosure of information may bring c1vil action f<w damages, ,ind seek other relief, as may be appropriate, against the officer or employee of IIUD or the IIA for the unauthorized disclosme or improper use

0MB Burden Statement. The public reporting burden for this information collection is estimated to he O.16 hours for new admissions and 08 hours for household members turning 19, including the time for reviewing, searching existing data sources, gathenng and maintaining the data neeckd, and compleli1ig and reviewing a,e collection ofmfonualion. Cullectiun or infonu,twn income and asseb is required for program eligibility delernrinstiun purposes. The suhmissi,,n of the consent fo1m is necessary (t,1rm-HlJD 9886) so that PH As can c,my mt the requirements of Section 904 of the Stewart 13. McKinney I lorneless Assistance Amendments Act of 1988, as amended by Section 903 of the Ilousing and Community Development Act or 1992 and Secliun 3003 of the Onmilius Badget Recunc1lialio11Act or 1993 *(42* U.S.C. 3544) and Seclion 104 ofHOTMA lo ernme U1al HUD and PHAs can verify eligibility and income information for applicants and participants. This information collection is protected from disclosure by the Privacy Act. Send conunents regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this bmden, tu the OIIice uf Pubhc and lrnhanHrnsing, US. Depmlmenl of Housing ,md Urban Develc'JJIILenl, Waslunglor♦DC 20410. Vv11en providing connncnts, please refer to orvlB Approval No_ 2577-02 95_ HUD may not conduct and sponsor, and a person is not required to respond to, a collection of info1mation unless the collection displays a valid control number.

U.S. Department of Housing and Urban Development

Document Package for Applicant's/Tenant's Consent to the Release Of Information

This Package contains the following documents:

1. HUD-9887/A Fact Sheet describing the necessary verifications
2. Form HUD-9887 (to be signed by the Applicant or Tenant)
3. Form HUD-9887-A (to be signed by the Applicant or Tenant and Housing Owner)
4. Relevant Verifications (to be signed by the Applicant or Tenant)

Each household must receive a copy of the 9887/A Fact Sheet, forn, HUD-9887, an<l forn, HLD-9887-A

HUD-9887/A Fact Sheet

Verification of Information Provided by Applicants and Tenants of Assisted Housing

What Verification Involves

To receive housing assistance, applicants and tenants who are at least 18 years of age and each family head. spouse, or co-head regardless of age must provide the owner or management agent (OIA) or public housing agency (PHA) with certain information specified by the U S Department of Housing and Urban Development (HUD),

To make sure that the assistance is used property, Federal laws require that the information **you** provide be verified, This infomnation is verified In two ways:

HUD, 0/As, and PHAs may verify the infomnation you provide by checking with the records kept by certain public agencies (e.g., Social Security Administration (SSA), State agency that keeps wage and unemployment compensation claim information and the Department of Health and Human Seivices' (HHS) National Directory of New Hires (NDNH) database that stores wage, new hires, and unemployment compensation). HUD (only) may verify information covered in your tax returns from the U.S. Internal Revenue SeMce (IRS)_ You give your consent to the release of this information by signing form HUD-9887. Only HUD, O/P,; and PHAs can receive information authorized by this form.

2. The 0/A must verify the information that is used to determine your eligibility and the amount of rent you pay. You give yoor consent to the release of this information by signing the form HUO-9887, the fornn HUD-9887-A. and the individual verification and consent forms that apply to you. Federal laws limit the kinds of infomnation the O/A can receive about you The amount of income you receive helps to determine the amount of rent you will pay The 0/A Vvill verify all of the sources of income that you report There are certain allovitances that reduce the income used in determining tenant rents

Example: Mrs. Anderson is 62 years old. Her age qualifies her for a medical allowance_ Her annual income will be adjusted because of this allm• ronce_ Because Mrs_ Anderson's medical expenses will help determine the amount of rent she pays, the O/A is required to verify any medical expenses that she reports.

Example: Mr. Harris does not qualify for the medical allowance because he is not at least 62 years of age and he is not handicapped or disabled. Because he is not eligible for the medical allowance, the amount of his medical expenses does not change the amount of rent he pays Therefore. the O/A cannot ask Mr. Harris anything about his medical expenses and cannot verify with a third party about any medical expenses he has

Customer Protections

Information received by HUD is protected by the Federal Privacy Act Information received by the O/A or the PHA is subject to State privacy laws. Employees of HUD, the O/A, and the PHA are subject to penalties for using these consent forms improperly. You do not have to sign the form HUD-9887, the form HUD-9887-A, or the individual verification consent forms when they are given to you at your certification cr recertification inteiview. You may take them home with you lo read or lo discuss with a third party of your choice. The 0/A will give you another date when you can return to sign these forms.

If you cannot read and/or sign a consent form due to a disability, the 0/A shall make a reasonable accommodation in accordance with Section 504 of the Rehabilitation Act of 1973 Such accommodations may include: home visits when the applicant's or tenant's disability prevents him/her from coming to the office to complete the fomns; the applicant or tenant authorizing another person to sign on his/her behalf: and for persons with visual impairments. accommodations may include providing the forms in large script or braille or providing readers.

If an adult member of your household, due to extenuating circumstances, is unable to sign the form HUD-9887 cr the individual verification forms on time, the 0/A may document the file as to the reason for the delay and the specific plans to obtain the proper signature as soon as possible.

The O/A must tell you, or a third party which you choose, of the findings made as a result of the 0/A verifications authorized by your consent. The O/A must give you the opportunity to contest such findings in accordance with HUD Handbook 4350.3 Rev. 1. However, for information received under the form HUD-9887 or form HUD-9687-A, HUD, the O/A, cr the PHA, may inform you of these findings.

O/As must keep tenant files in a location that ensures confidentiality. Any employee of the O/A who fails to keep tenant information confidential is subject to the enforcement provisions of the State Privacy Act and is subject to enforcement actions by HUD Also, any applicant or tenant affected by negligent disclosure or improper use **of** information may bring cMl action for damages, and seek other relief, as may be appropriate, against the employee.

HUD-9887/A requires the O/A to give each household a copy of the Fact Sheet, and forms HUD-9887, HUD-9887-A along with appropriate individual consent forms The package you will receive will include the following documents

1 **HUD-9887/A** Fact **Sheet**· Describes the requirement to verify infcrmation provided by individuals who apply for housing assistance. This fact sheet also describes consumer protections under the verification process

2.Form HUD-9887: Allows the release of information between government agencies.

3,Form HUD-9887-A: Describes the requirement of third party verification along l/l/1th consumer protections.

4 Individual verification consents: Used to verify the relevant information provided by applicantsAenants to determine their eligibility end level of benefits

Consequences for Not Signing the Consent Forms

If you fail to sign the form HUD-9887, the fomn HUD-9887-A. or the individual verification forms, this may result in your assistance being denied (for applicants) or your assistance being terminated (for tenants). See further explanation on the forms HUD-9887 and 9887-A

If you are an applicant and are denied assistance fcr this reason, the 0/A must notify you of the reason for your reJection and give you an opportunity to appeal the decision.

If you are a tenant and your assistance is terminated fcr this reason, the 0/A must follml\/ the procedures set out in the Lease_ This includes the opportunity for you to meet with the 0/A

Programs Covered by this Fact Sheet

- Rental Assistance Program (RAP)
- Rent Supplement
- Section 8 Housing Assistance Payments Programs (administered by the Office of Housing)
- Section 202
- Sections 202 and 811 PRAC
- Section 202/162 PAC
- Section 221(d)(3) Below Market Interest Rate
- Section 236
- HOPE 2 Home Ownership of Multifamily Units

O/As must give a copy of this HUD Fact Sheet to each household See the Instructions on form HUD-9887-A.

Attachment to forms **HUD-9887** & **9887-A** (02/2007)

Notice and Consent for the Release of Information

to the US Department of Housing and Urban Development (HUD) and to an Owner and Management Agent (0/A), and to a Public Housing Aqencv (PHA)

U.S. Department of Housing and Urban Development
Office of Housing
Federal Housing Commissioner

HUD Office requesting release of information (Own er should provide the full address of the HUD Field Office, Attention: Director, Multifamily Division):	0/A requesting release of information (Owner should provide the full name and address of the Owner.I	PHA requesting release of information (Owner should provide the full name and address of the PHA and the title of the director or administrator. If there is no PHA Owner or PHA contract administrator for this project, mark an X through this entire box.):

Notice To Tenant Do not sign this fonm if the space above for organizations requesting release of information is left blank. You do not have to sign this form when it is given to you. You may take the form home with you to read or discuss with a third party of your choice and return to sign the consent on a date you have worked out with the housing owner/manager.

Authority: Section 217 of the Consolidated Appropriations Act of 2004 (Pub L. 108-199). This law is found at 42 U.S.C.653(J). This law authorizes HHS to disclose to the Department of Housing and Urban Development (HUD) information in the NDNH portion of the "Location and Collection System of Records" for the purposes of verifying emplo:,ment and income of individuals participating in specified programs and, after removal of personal identifiers, to conduct analyses of the employment and income reporting of these individuals. Information may be disclosed by the Secretary of HUD to a private owner. a management agent, and a contract administrator in the administration of rental housing assistance

Section 904 of the stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by section 903 of the Housing and Community Development Act of 1992 and section 3003 of the Omnibus Budget Reconciliation Act of 1993. This law is found at 42 U.S.C. 3544.This law requires you to sign a consent fonm authorizing: (1) HUD and the PHA to request wage and unemployment compensation claim information from the state agency responsible for keeping that information: and (2) HUD. 0/A. and the PHA responsible for determining eligibility to ve‧y salary and wage information pertinent to the applicant's or participant's eligibility or level of benefits; (3) HUD to request certain tax return information from the U.S. SocialSecurityAdministration (SSAJ andthe U.S. Internal Revenue Service (IRS).

Purpose: In signing this consent form, you are authorizing HUD, the above-named 0/A, and the PHA to request income information from the government agencies listed on the form. HUD the 0/A. and the PHA need this information to verify your household's income to ensure that you are eligible for assisted housing benefits and that these benefits are set at the correct level. HUD. the 0/A. and the PHA may participate in computer matching programs with these sources to verify your eligibility and level of benefits. This form also authorizes HUD. the OJA and the PHA to seek wage, new hire (W-4). and unemployment claim information from current or former employers to verify information obtained through computer matching.

Uses of Information to be Obtained: HUD is required to protect the income information it obtains 1n accordance with the Privacy Act of 1974. 5 U.S.C. 552a. The 0/A and the PHA is also required to protect the income information it obtains in accordance with any applicable State privacy law. After receiving the information covered by this notice of consent. HUD, the 0/A, and the PHA may inform you that your eligibility for, or level of, assistance is uncertain and needs to be verified and nothing else.

HUD. 0/A. and PHA employees may be subject to penalties for unauthorized disclosures or improper uses of the income information that is obtained based on the consent form.

Who Must Sign the Consent Form: Each member of your household who is at least 18 years of age and each family head, spouse or co-head. regardless of age. must sign the consent form at the initial certification and at each recertification. Additional signatures must be obtained from new adult members when they join the household or when members of the household become 18 years of age

Persons who apply for or receive assistance under the following programs are required to sign this consent form

Rental Assistance Program (RAP)

Rent Supplement

Section 8 Housing Assistance Payments Programs (administered by the Office of Housing)

Section 202: Sections 202 and 811 PRAC: Section 2021162 PAC Section

221(d)(3) Below Markel Interest Rate

Section 236

HOPE 2 Homeownership of Multifamily Units

Failure to Sign Consent Form: Your failure to sign the consent fomi may result in the denial of assistance or termination of assisted housing benefits. If an applicant is denied assistance fa this reason, the owner must follow the notification procedures in Handbook 4350.3 Rev. 1 If a tenant is denied assistance for this reason. the owner or managing agent must follow the procedures set out in the lease.

Consent: I consent to allow HUD, the O/A, or the PHA to request and obtain income information from the federal and state agencies listed on the back of this form for the purpose of verifying my eligibility and level of benefits under HUD's assisted housing programs.

Signatures:		Additional Signatures, if needed:	
Head of Household	Date	Other Family Members 18 and Over	Date
Spouse		Other Family Members 18 and Over	Date
Other Family Members 18 and Over	Date	Other Family Members 18 and Over	Date
Other Family Members 18 and Over	Date	Other Family Members 18 and Over	Date

K)riginal is retained on file at the prqect site ref Handbooks 4350.3 Rev-1, 45711, 4571/2 & 4571.3 and HOPE II Notice of Program Gu1del1nes form HUD-9887 (02/2007)

Agencies To Provide Information

State Wage Information Collection Agencies. (HUD and PHA). This consent is limited to wages and unemployment compensation you have received during period(s) within the last 5 years when you have received assisted housing benefits.

U.S. Social Security Administration (HUD only). This consent is limited to the wage and self employment information from your current form W-2.

National Directory of New Hires contained in the Department of Health and Human Services' system of records. This consent is limited to wages and unemployment compensation you have received during period(s) within the last 5 years when you have received assisted housing benefits.

U.S. Internal Revenue Service (HUD only). This consent is limited to information covered in your current tax return.

This consent is limited to the following information that may appear on your current tax return:

1099-S Statement for Recipients of Proceeds from Real Estate Transactions

1099-B Statement for Recipients of Proceeds from Real Estate Brokers and Barters Exchange Transactions

1099-A Information Return for Acquisition or Abandonment of Secured Property

1099-G Statement for Recipients of Certain Government Payments

1099-DIV Statement for Recipients of Dividends and Distributions

1099 INT Statement for Recipients of Interest Income

1099-MISC Statement for Recipients of Miscellaneous Income

1099-0ID Statement for Recipients of Original Issue Discount

1099-PATR Statement for Recipients of Taxable Distributions Received from Cooperatives

1099-R Statement for Recipients of Retirement Plans W2-G

Statement of Gambling Winnings

1065-K1 Partners Share of Income, Credits, Deductions, etc.

1041-K1 Beneficiary's Share of Income, Credits, Deductions, etc.

1120S-K1 Shareholder's Share of Undistributed Taxable Income, Credits, Deductions, etc.

I understand that income information obtained from these sources will be used to verify information that I provide in determining initial or continued eligibility for assisted housing programs and the level of benefits.

No action can be taken to terminate, deny, suspend, or reduce the assistance your household receives based on information obtained about you under this consent until the HUD Office, Office of Inspector General (OIG) or the PHA (whichever is applicable) and the O/A have independently verified: 1) the amount of the income, wages, or unemployment compensation involved, 2) whether you actually have (or had) access to such income, wages, or benefits for your own use, and 3) the period or periods when, or v,,ith respect to which you actually received such income, wages, or benefits. A photocopy of the signed consent may be used to request a third party to verify any information received under this consent (e.g., employer).

HUD, the O/A, or the PHA shall inform you, or a third party which you designate, of the findings made on the basis of information verified under this consent and shall give you an opportunity to contest such findings in accordance with Handbook 4350.3 Rev. 1

If a member of the household who is required to sign the consent form is unable to sign the form on time due to extenuating circumstances, the O/A may document the file as to the reason for the delay and the specific plans to obtain the proper signature as soon as possible.

This consent form expires 15 months after signed.

Privacy Act Statement. The Department of Housing and Urban Development (HUD) is authorized to collect this information by the U.S. Housing Act of 1937, as amended (42 U.S.C. 1437 et seq.); the Housing and Urban-Rural Recovery Act of 1983 (P.L. 98-181); the Housing and Community Development Technical Amendments of 1984 (P.L. 98-479); and by the Housing and Community Development Act of 1987 (42 USC 3543). The information is being collected by HUD to determine an applicant's eligibility, the recommended unit size, and the amount the tenant(s) must pay toward rent and utilities. HUD uses this information to assist in managing certain HUD properties, to protect the Government's financial interest, and to verify the accuracy of the information furnished. HUD, the owner or management agent (O/A), or a public housing agency (PHA) may conduct a computer match to verify the information you provide. This information may be released to appropriate Federal, State, and local agencies, when relevant, and to civil, criminal, or regulatory investigators and prosecutors. However, the information v,,ill not be otherv,,ise disclosed or released outside of HUD, except as permitted or required by law. You must provide all of the information requested. Failure to provide any information may result in a delay or rejection of your eligibility approval.

Penalties for Misusing this Consent:
HUD, the O/A, and any PHA (or any employee of HUD, the O/A, or the PHA) may be subject to penalties for unauthorized disclosures or improper uses of information collected based on the consent form.

Use of the information collected based on the form HUD 9887 is restricted to the purposes cited on the form HUD 9887. Any person who knowingly or v,,il♦ully requests, obtains, or discloses any information under false pretenses concerning an applicant or tenant may be subject to a misdemeanor and fined not more than $5,000.

Any applicant or tenant affected by negligent disclosure of information may bring civil action for damages, and seek other relief, as may be appropriate, against the officer or employee of HUD, the Owner or the PHA responsible for the unauthorized disclosure or improper use.

Applicant's/Tenant's Consent to the Release of Information

Verification by Ownersof Information Supplied by Individuals \/Vho Apply for Housing Assistance

U.S. Department of Housing and Urban Development
Office of Housing
Federal Housing Commissioner

Instructions to Owners

Give the documents listed below to the applicants/tenants to sign Staple or clip them together in one package in the order listed.

a. The HUD-9887/A Fact Sheet
b. Form HUD-9887.
c Form HUD-9887-A
d . Relevant verifications (HUD Handbook 4350.3 Rev. 1)

2. Verbally inform applicants and tenants that
   a. They may take these forms home with them to read or to discuss with a third party of their choice and to return to sign them on a date they have worked out with you, and
   b. If they have a disability that prevents them from reading and/or signing any consent, that you, the Owner, are required to provide reasonable acccmmodations.

3 Owners are required to give each household a copy of the HUD9887/A Fact Sheet, form HUD-9887, and form HUD-9887-A after obtaining the required applicants/tenants signature(s). Also, ol/\irlers must give the applicants/tenants a copy of the signed individual verification forms upon their request.

Instructions to Applicants and Tenants

This Form HUD-9887-A contains customer information and protections concerning the HUD-required verifications that Owners must perform

1. Read this material which explains:
   • HUD's requirements concerning the release of information, and
   • Other customer protections
2 Sign on the last page that·
   • you have read this form, or
   • the Owner or a third party of your choice has explained it to you, and
   • you consent to the release of information for the purposes and uses described.

Authority for Requiring Applicant's/Tenant's Consent to the **Release** of Inform **ation**

Section 904 of the Stewart B McKinney Homeless Assistance Amendments Act of 1988, as amended by section 903 of the Housing and Community Development Act of 1992. This law is found at 42 U.S.C. 3544

In part, this law requires you to sign a coosent form authorizing the Owner to request current or previous employers to verify salary and wage information pertinent to your eligibility or level of benefits. In addition, HUD regulations (24 CFR 5.659, Family Information and Verification) require as a condition of receiving housing assistance that you must sign a HUD-approved release and consent authorizing any depository or private source of income to furnish such information that is necessary in determining your eligibility or level of benefits. This includes information that you have provided which will affect the amount of rent you pay. The information includes income and assets, such as salary, welfare benefits, and interest earned on savings accounts. They also include certain adjustments to your income, such as the allowances for dependents and for households whose heads or spouses are elderly handicapped, or disabled; and allowances for child care expenses, medical expenses, and handicap assistance expenses

Purpose of Requiring Consent **to** the Release of Information

In signing this consent form, you are authorizing the Owner of the housing prOJect to which you are applying for assistance to request information from a third party about you HUD requires the housing o=er to verify all of the information you provide that affects your eligibility and level of benefits to ensure that you are eligible for assisted housing benefits and that these benefits are set at the correct levels. Upon the request of the HUD office or the PHA (as Contract Administrator), the housing O1/\irler may provide HUD or the PHA ,,ath the information you have submitted and the information the Owner receives under this consent.

Uses of Information to be Obtained

The individual listed on the verification form may request and receive the information requested by the verification, subject to the limitations of this form. HUD is required to protect the income information it obtains in accordance with the Privacy Act of 1974, 5 U.S.C 552a. The Owner and the PHA are also required to protect the income information they obtain in accordance with any applicable state privacy law. Should the Owner receive information from a third party that is inconsistent with the information you have provided, the Owner is required to notify you in 'M♦ing idenMying the information believed to be incorrect. If this should occur, you will have the opportunity to meet v.ith the Owner to discuss any discrepancies

Who Must Sign the Consent Form

Each member of your household who is at least 18 years of age, and each family head, spouse or co-head. regardless of age must sign the relevant consent forms at the initial certification at each recertification and at each interim certification, if applicable. In addition, v,,hen new adult members join the household and ¼hen members of the household become 18 years of age they must also sign the relevant consent forms.

Persons who apply for or receive assistance under the follov,,ing programs must sign the relevant ccnsent forms:

Rental Assistance Program (RAP)
Rent Supplement
Section 8 Housing Assistance Payments Programs (administered by the Office of Housing)
Section 202
Sections 202 and 811 PRAG
Section 2021162 PAC
Section 221(d)(3) Below Market Interest Rate
Section 236
HOPE 2 Home Ownership of Multifamily Units

Failure to Sign the Consent Form
Failure to sign any required consent form may result in the denial of assistance or termination of assisted housing benefits. If an applicant is denied assistance for this reason, the O/A must follow the notification procedures in Handbook 4350.3 Rev. 1. If a tenant is denied assistance for this reason, the O/A must follow the procedures set out in the lease.

Conditions
No action can be taken to terminate, deny, suspend or reduce the assistance your household receives based on information obtained about you under this consent until the O/A has independently 1) verified the information you have provided with respect to your eligibility and level of benefits and 2) Vvith respect to income (including both earned and unearned income), the O/A has verified whether you actually have (or had) access to such income for your own use, and verified the period or periods when, or with respect to you actually received such income, wages, or benefits.

A photocopy of the signed consent may be used to request the information authorized by your signature on the individual consent forms. This would occur if the O/A does not have another individual verification consent with an original signature and the O/A is required to send out another request for verification (for example, the third party fails to respond). If this happens, the O/A may attach a photocopy of this consent to a photocopy of the individual verification form that you sign. To avoid the use of photocopies, the O/A and the individual may agree to sign more than one consent for each type of verification that is needed. The O/A shall inform you, or a third party which you designate, of the findings made on the basis of information verified under this consent and shall give you an opportunity to contest such findings in accordance with Handbook 4350.3 Rev. 1.

The O/A must provide you with information obtained under this consent in accordance with State privacy laws.

If a member of the household who is required to sign the consent formsisunable to sign the required forms on time, due toextenuating circumstances, the O/A may document the file as to the reason for the delay and the specific plans to obtain the proper signature as soon as possible.

Individual consents to the release of infonmation expire 15 months after they are signed. The O/A may use these individual consent forms during the 120 days preceding the certification period. The O/A may also use these forms during the certification period, but only in cases where the O/A receives information indicating that the information you have provided may be incorrect. Other uses are prohibited.

The O/A may not make inquiries into information that is older than 12 months unless he/she has received inconsistent information and has reason to believe that the information that you have supplied is incorrect. If this occurs, the O/A may obtain information within the last 5 years when you have received assistance.

I have read and understand this information on the purposes which and uses of information that is verified and consent to the release of information for these purposes and uses.

Name of Applicant or Tenant (Print)

Signature of Applicant or Tenant & Date

I **have read and understand the purpose of this consent and its uses and** I **understand that misuse of this consent can lead to** personal penalties **to** me.

Name of Project Owner or his/her representative

Title

Signature & Date
cc:Applicant/Tenant
Owner file

Penalties for Misusing this Consent:

HUD, the O/A, and any PHA (or any employee of HUD, the O/A, or the PHA) may be subject to penalties for unauthorized disclosures or improper uses of information collected based on the consent form.

Use of the information collected based on the form HUD gss7-A is restricted to the purposes cited on the form HUD 9887-A. Any person who knowingly or Vvillfully requests, obtains or discloses any information under false pretenses concerning an applicant or tenant may be subject to a misdemeanor and fined not more than $5,000.

Any applicant or tenant affected by negligent disclosure of information may bring civil action for damages, and seek other relief, as may be appropriate, against the officer or employee of HUD, the O/A or the PHA responsible for the unauthorized disclosure or improper use.

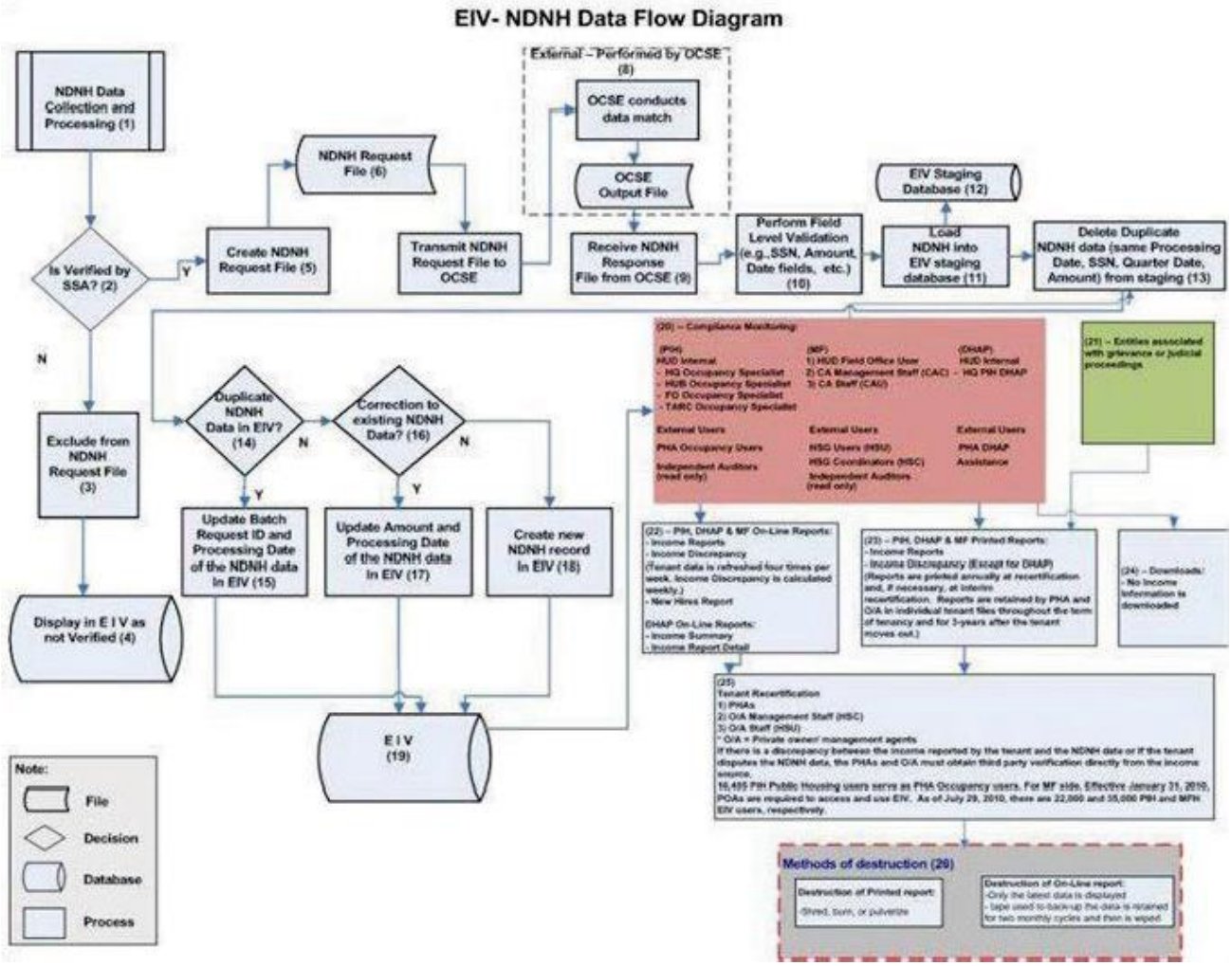
Onginal is retained on file at the project site

ref. Handbooks 4350.3 Rev.1, 4571.1, 4571.2 & 4571.3 and HOPE II Notice of Program Guidelines

form HUD-9887-A (02/2007)

APPENDIX D

Data Flow Diagram



APPENDIX E

Redisclosure Information

The following authorized individuals may send and receive the files for comparison and use the results of the comparisons for the authorized purposes set forth in the HUD-NDNH computer matching agreement. Additional users may only be authorized by OCSE's written approval.

EIV Team
Rick Graham, EIV IT Manager
Derek Warren, EIV Primary System Security Administrator (SSA)