

Wage and Asset Match Policy – 2016

The Fairhaven Housing Authority (hereinafter referred to as the FHA) shall conduct a wage match for every adult member (aged 18 and over) of the tenant household residing in state housing programs under M.G. L. c. 62E, M. G. L. 66A, 760 CMR 6.00 and 801 CMR 3.00.

All adult tenants will be informed about the wage match program and must authorize the use of their Social Security numbers for the program. Tenants are required by the lease to provide their social security number, and to authorize use of their social security number by the housing. authority for verification of income and assets through DOR's wage reporting system. Tenants or applicants are not required to have a social security to be eligible or housed.

The attached letter and signature form is issued to each tenant every year . The report is based on and generated from the information provided on the forms signed and submitted by each tenant. The report is processed through the Department of Revenue (DOR) for the Commonwealth of Massachusetts.

All information gathered from the forms and the Wage& Asset report processed through the DOR will be held in the strictest confidence. The only authorized employees allowed to request and receive Wage & Asset information for the Fairhaven Housing Authority as of 6/30/2016 are Krisanne Sheedy, Executive Director and Jo-Ann Turgeon, Office Administration. The Fairhaven Housing

Authority will report any Wage & Asset information that is used or accessed improperly to the Department of Housing and Community Development (DHCD) both verbally and in writing. The Fairhaven Housing Authority will cooperate with DHCD to enjoin or prevent misuse of, regain possession of, and otherwise protect the data. Any unauthorized disclosure of wage reporting information will result in the immediate termination of the FHA's authorization to receive such information. As a holder of the personal data, any unauthorized disclosure of wage reporting information may subject the FHA to payment of monetary damages. Any release of unauthorized release of wage reporting information may subject the employees of the FHA to a fine.

Procedures for Handling The Use of Wage Reporting Information –

The Fairhaven Housing Authority shall only use the wage reporting information to verify the income and assets of the adult members of all the households living within the Fairhaven Housing Authority's State Housing Programs. This would include all tenants living at a Chapter 667 or Chapter 705 housing, specifically; 667-1 & 667-2 at Green Meadows # 1-42 and Building #100 at McGann Terrace, 667-3 Oxford Terrace at 275 Main Street, 667-4 Dana Court at 180 Adams St., 667-5 Anthony Haven at 227 Main St. and the six 705 units #32 – 42 Ash St..

Procedures for Handling Cases of Income Discrepancy

The information obtained from DOR is to be compared with income information reported by tenants for rent determination to see if there are any significant discrepancies. Significant in this case is defined as a difference between a household's income, based on information from DOR and that reported by the tenant of ten percent or more. Cases of discrepancy will be identified in the manner described below. The report will be reviewed by the authorized staff. All results will be compared with the income

information on hand from the most current rent re-determination. If significant differences are present between the Wage & Asset report results and the most current income information on file the information will be reviewed by the Executive Director. tenant will be contacted in writing to advise them of the discrepancy, allow them the opportunity to respond and present any corresponding information. The tenant will be advised on the language of their lease which speaks to timely and proper reporting of any and all income being received. The following steps outline the course of action that the FHA follows if a case of Income Discrepancy is identified and confirmed :

A. Identifying Cases of Income Discrepancy

The FHA will compare income and asset information reported by members of a tenant household with wage reporting information provided by DOR. The FHA will use its best judgment to identify cases where there is a discrepancy of ten percent or greater. This ten percent figure triggers a rent re-determination under 760 CMR 6.00 and 760 CMR 49.00.

When the FHA believes a tenant probably has income that exceeds this ten percent threshold, the FHA will ask the tenant to explain the difference at meetings with housing authority staff.

B. Meetings/Hearing Process

The FHA shall provide the tenant with an opportunity to explain the discrepancy.

1. The tenant will be requested in writing to attend a meeting at the housing agency. The letter must state the purpose of the meeting and contain the information from DOR that will be discussed. The letter will ask the tenant to call the housing agency to arrange for a mutually agreeable time.

2. If the tenant does not contact the FHA, the housing agency will make a reasonable effort to set up the meeting. If no meeting has

been arranged with the tenant after three weeks from the date of the notification letter, the housing agency will proceed to notify the tenant of his or her right to request a Grievance Hearing [See Step 5].

3. At the meeting, the housing agency director or his or her designee will discuss the information obtained from DOR concerning the tenant's wages and how it might affect the tenant's rent or voucher amount, or might be grounds for the tenant's eviction or termination. The tenant will be given three weeks from the date of this meeting to provide income information, documentation, or other evidence that shows why the wage reporting information received from DOR is incorrect. The FHA will evaluate all information provided by the tenant.

4. The FHA will then send a letter notifying the tenant of the action it will take, if any. If adverse action will be taken (i.e., increased rent, termination, or eviction), the housing agency will ask the tenant to attend an additional meeting. The letter will state clearly how the tenant is to schedule this meeting and the deadline for doing so. This meeting should be held within three weeks of the date of the letter. Any adverse action the FHA plans to take shall commence following this meeting, if one is held, or at the end of the three-week period, if the tenant does not schedule or attend a meeting.

5. Tenants who feel aggrieved because of adverse action taken by the FHA are entitled to a grievance hearing according to procedures outlined in 760 CMR 6.08 for state housing tenants. (which refers to the process outlined in 760 CMR 6.08).

Reporting Adverse Actions to DHCD

The FHA shall report to DHCD any adverse actions taken for each tenant, such as evictions or termination proceedings, rent increases, or rent repayment arrangements. These cases will be reported on the attached form. It is not necessary to report cases that are investigated but are cleared.