



Commonwealth of Massachusetts
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

Deval L. Patrick, Governor ◆ Timothy P. Murray, Lt. Governor ◆ Tina Brooks, Undersecretary

Public Housing Notice: 2008-12

Memorandum

To: All Local Housing Authority Executive Directors
All Non-Profit Housing Agencies administering Massachusetts Rental Voucher Programs

From: Bruce E. Siegel, Senior Auditor, Bureau of Housing Management

Subject: Wage Match for State Housing Program Tenants

Date: September 30, 2008

This Public Housing Notice 2008-12 is a supplemental notice to Public Housing Notice 2007-01, dated January 24, 2007. The 2007-01 Notice announced the availability of a web based system for conducting a Wage Match for state housing program tenants, including tenants in conventional housing, MRVP and AHVP, to local housing authorities (LHAs). All Massachusetts housing authorities and non-profit agencies that administer state-funded housing programs must participate in this Wage Match program. The pertinent law and regulations can be found at M.G.L. c. 62E, M.G.L. c. 66A, 760 CMR 6.00 and 801 CMR 3.00. This supplement will provide clarification for a variety of issues that have surfaced recently. In no particular order, they are the following:

Data Entry

On the Wage Match home page, there are two types of requests; manual and bulk. Manual requests require that you enter the required data as one record for each individual. Bulk requests allow for the submission of a large group of multiple individuals. The bulk request is accomplished by using the copy/paste function from another file. For example, if you maintain an Excel spreadsheet for your tenants, you can submit a bulk request by copying the appropriate records, and pasting them in the "Input Bulk Request" area. For further clarification, please click Help on the DHCD Wage Match System home page.

No Response to Submission

Submissions are batched daily, whether from one LHA or in many cases, from multiple LHA's on the same day. If an error is detected, the entire batch is rejected. Unfortunately, the LHA(s) is/are not notified. If you don't receive a response to your submission in approximately five to seven days, assume that the batch was rejected, and re-submit your request.

Applicants and Tenants

DHCD has always stated that Wage Match is for tenants. Wage Match can be done for applicants that are perspective tenants at initial lease-up. It should be done when final verification of eligibility and qualification is completed. You should ensure the information is as timely as possible when performing the match function.

Records Safeguard and Retention

All agencies must adhere to uniform confidentiality and security standards and procedures established by the Department of Revenue (DOR). The Wage Match information is confidential, and must be adequately safeguarded. Access to it during normal business hours must be limited to only the employee(s) specifically designated by senior Management. Do not place wage match reports in tenant files. They must be maintained by that employee in a separate file or book. DOR information must never be co-mingled with other information, must never be transmitted or used on an email system, and may not be removed from your site. For additional information, please refer to the "Confidentiality and Controls" section of our original January 24, 2007 Public Housing Notice 2007-01. Regarding retention, all records should be maintained for at least 7 years.

Social Security Number

LHAs shall conduct a wage match for every adult member (aged 18 and over) of the tenant household residing in state housing programs. Tenants must 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. Our original Notice stated that; "Failure by a head of household or any adult (age 18 or over) household member to provide this Agency with a social security number is grounds for termination of the household's tenancy". That is incorrect. There is no requirement that applicants or tenants have a social security number to be eligible for state housing. However, if he/she has a social security number, it must be provided. The attached letter replaces the "Sample Notice To Tenants" that was included with the original Public Housing Notice. Please send it to all households as part of your next recertification package. The letter explains the program and asks adult tenants to furnish their Social Security numbers. You must personalize this letter before sending it. The letter should be placed on housing authority letterhead.

Executive Director/Board Approval

Your signature below will indicate that you have read and thoroughly understand the contents of this Notice. Please have the Executive Director, as well as the Chairman of your Board of Commissioners sign on the appropriate lines below, after Board approval, and forward a copy to your Housing Management Specialist. For more information about the wage match system, please call Bruce Siegel of the Bureau of Housing Management at (617) 573-1235.

Executive Director

Chairman, Board of Commissioners

Date

ATTACHMENTS: Revised Sample Notice to Tenants

Dear Massachusetts Public Housing Tenant Head of Household or Household Member:

Dear Massachusetts Rental Voucher Participant Head of Household or Household Member:

Under state law, each head of household and adult household member (age 18 and over) residing in state-aided public housing is required to participate in the Massachusetts Wage Reporting System. The purpose is to verify the income of households. This will be done by matching the income and assets reported by each head of household and adult household member (age 18 and older) of each household with wages reported by employers to the Massachusetts Department of Revenue.

Therefore, we are requiring you at this time to provide your social security number (SSN). Many households signed such a release several years ago. We are asking all tenants to sign the release again to allow for the most current information to be provided. This will update the release already on file so that all current members of the household eighteen years of age and older may be included. New residents and those households who failed to comply during the last wage reporting match are asked to submit an original release to the Authority. The SSNs and the names of the head of household and all adult members of the household will be forwarded by this housing agency to the state agency, the Department of Housing and Community Development (DHCD), which administers the state-aided public housing programs. DHCD will forward this information to the Department of Revenue. The information you have reported to us concerning your income and assets will be matched with wage reporting information reported by employers to the Department of Revenue. The Department of Revenue will provide DHCD with information from its records as to your reported wages and the reported wages of other members of your household, and DHCD will inform this housing agency of this information.

If there is a “mismatch” between the information provided to us by the household and the information provided by the Department of Revenue, we will contact the head of household. We will meet and work with the head of household whose information is in question to try to resolve the “mismatch”. However, if the “mismatch” cannot be resolved, and we determine that the household has incorrectly underreported wages, we may take one or more of the following actions: adjust the household’s current rent; seek repayment of rental underpayments incorrectly made by the household, and/or terminate the household’s tenancy. If we take any of these actions, the head of household has the right to dispute our decision through this Agency’s grievance procedures and in court.

Any “mismatch” which cannot be resolved could also result in referral to DHCD. Information concerning you and your household may also be referred to the District Attorney, Attorney General, or other appropriate law enforcement officials, which may result in further investigation, action, and/or criminal prosecution.

Before you sign this form, it is important that you know the following additional information:

1. In accordance with state law (chapter 43 of the Acts of 1997, section 174; 760 CMR 6.05 (3)), it is mandatory that each head of household and adult household member (age 18 and over) disclose to us his or her social security number. If a head of household or any adult (age 18 or over) household member has a social security number, and fails to provide this Agency with that social security number, that is grounds for termination of the household’s tenancy.
2. We will use and hold your social security number and the information obtained from the Department of Revenue and DHCD in our records only for the purposes described above unless we get your consent to use it for any additional purposes.

3. We will keep the wage reporting information confidential. Only employees of this Agency and the other agencies or entities described above may see this wage reporting information or keep it in their records for the purposes described above. These other agencies or offices will also keep the information confidential. If we receive a legal order to release the information to anyone else, we will notify you.
4. If you ask, you or your authorized representative have a right to inspect and copy information collected about you.
5. If you ask, we will answer your questions about how we keep and use this information.
6. You may object to the accuracy, completeness, pertinence, timeliness, relevance, use or dissemination of information we hold about you. If you object, we will investigate your objection and will either correct a problem or make your objection part of the file. If you are dissatisfied, we will further inform you of any additional opportunity for appeal.

Sincerely,

LHA

Date