

Thank you for attending the North Dakota Housing Finance Agency's (NDHFA) Compliance Manual Review webinar on Nov. 18, 2020. As a follow-up, I promised to provide specific guidance for verifying social security benefits and address whether social security numbers are required to qualify tenants. Both items are addressed below my signature.

I'd also like to note an additional item of importance. The webinar we hosted was specific to how NDHFA handles compliance as LIHTC program administrator. If your organization does business in other states, the compliance administrator at another state agencies may have different requirements. It is important to understand that the procedures outlined in NDHFA's compliance manuals apply to properties in North Dakota. Additionally, an investor may have more stringent requirements than the program administrator. Therefore, you should follow the investor's requirements first. If the investor's requirements are less stringent than the program administrator's guidance, you must follow the most restrictive policy.

Finally, if you would like to refer back to the compliance webinar, the recording and the manuals can be accessed in the rental compliance section of NDHFA's website, <https://www.ndhfa.org/index.php/compliance/>.

If you have additional questions, you are welcome to contact me directly.

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Social Security Benefits

Property managers may rely on documentation provided by applicants to verify Social Security (SS) and Supplemental Security Income (SSI). Annual award letters provided by an applicant can be utilized to verify gross social security benefits for the applicable year.

For example, an award letter received in 2019 stating 2020 benefits can be used for certifications in 2020. Social security letters are good for the full year because they are not dated, and they are provided after COLA or no COLA has been announced. **If a social security letter is dated, it is likely due to a change in benefits. Then verifications should be dated within 120 days of the effective date.**

Options for obtaining a SSA/SSI Benefit Statement:

1. The Resident/Applicant may print out a benefit verification letter using the My Social Security website, www.socialsecurity.gov/myaccount. The Resident/Applicant must have or can create an account to access to their benefit information.

2. The Resident/Applicant may call the regional office of the Social Security Administration at 1-800-772-1213.
 - a. The Resident/Applicant will need to supply his/her social security number and request a copy of his/her benefit statement for either Social Security or Supplemental Security Income.
 - b. The Social Security Administration has stated that benefit statements are mailed out within one day of receiving a request. The Resident/Applicant should verify the address to which the letter will be mailed to ensuring it is received in a timely manner.

Social Security Numbers

Internal Revenue Service (IRS) regulations allow you to ask for this information. Social Security Numbers (SSN) must be used for income eligibility verification purposes only. Equivalent identification includes a Work Visa, Alien Registration Receipt Card, Temporary Resident Card, IRS Individual Taxpayer Identification Number (ITIN), or Employment Authorization Card. Failure to provide a SSN or equivalent number could delay the application process.

Q: Is there any way to income-qualify household members who do not have any verifiable Social Security numbers or alternate numbers?

A: Yes. Verifying the income of household members without SSNs is difficult, but not impossible. An alternate method of verifying income is to provide picture identification to employers, allowing the employer to verify the individual who works for them and how much the individual earns. The Owner ultimately is responsible for proper documentation of income and must be able to demonstrate that all income has been verified.

NOTE: Some management companies, funders, investors or syndicators may be more restrictive than the IRS in this matter. You must follow the more restrictive rules, if any, that apply to your property.

Q: What if I have a household where some or all household members do not have SSNs or other approved citizenship documentation?

A: This household could still be eligible. **The tax credit and bond programs do not require proof of citizenship or legal status. If the certification process confirms that a household is income-qualified, the household may reside in the property.** The property may need to use alternative methods to confirm income sources for affected household members.

Q: Is a SSN the only acceptable documentation of identity?

A: No, several types of documentation are acceptable such as Work Visas, picture identification and Alien Registrations.