

STOCKBRIDGE HOUSING AUTHORITY

WAGE MATCH POLICY

SECURITY/CONFIDENTIALITY

This policy will serve to specify the Stockbridge Housing Authority's (SHA) procedures concerning data downloaded from DHCD (Department of Housing and Community Development) Wage Match program. The Wage Match Program is used by the SHA solely for the purpose of verifying income and asset data obtained from tenant household members in the Authority's state housing programs.

The SHA shall use Wage Match for all tenants of its 667-1 housing at Heaton Court and prohibits the dissemination of Wage Match information for any other purpose.

All tenants shall be informed, in writing, that they are required to participate in the Wage Match Program and that they must authorize the use of their social security numbers for that purpose.

The use of Wage Match information will be limited to those employees involved in the tenant certification process: the Executive Director and Administrative Assistant. Other employees are prohibited from using or accessing Wage Match information.

The Executive Director and Administrative Assistant are authorized to submit electronic requests for Wage Match information to DHCD on behalf of the Stockbridge Housing Authority.

The Stockbridge Housing Authority is subject to and complies with applicable laws and regulations relating to confidentiality and privacy.

When not in use, Wage Match records will be maintained in a locked file cabinet that is only accessible by authorized personnel. Wage Match information shall be destroyed when the Executive Director determines that no or insignificant (less than 10%) discrepancy is identified. In cases where a significant discrepancy is identified, the Authority shall maintain the information as per the Commonwealth of Massachusetts' Disposal Schedule No. 24/83, and after all administrative and judicial proceedings concerning the discrepancy are exhausted, whichever is later.

PROCEDURE

SHA will compare income and asset information reported by members of a tenant household with wage reporting information provided by DOR at annual recertification. The LHA will use its best judgment to identify cases where there is a discrepancy of ten percent or greater. When SHA believes a tenant has income that exceeds this ten percent threshold, they will ask the tenant to explain the difference at a meeting with the SHA Executive Director.

The tenant will be requested in writing to attend a meeting. The letter must state the purpose of the meeting and contain the information from DOR that will be discussed. The letter will give no less than ten-days notice of a meeting appointment and offer that the tenant may call the housing agency to reschedule for a mutually agreeable time if there is a conflict.

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.

At the meeting, the Executive Director or his/her designee will discuss the information obtained from DOR concerning the tenant's income and how it might affect the tenant's rent amount, or might be grounds for the tenant's eviction.

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. SHA will evaluate all information provided by the tenant.

SHA will then send a letter notifying the tenant of the action it will take, if any. If adverse action will be taken (increased rent, repayment, eviction), the housing agency will offer the tenant an additional meeting and give a date and time of the proposed meeting. The tenant may request to reschedule to a more convenient time, but the meeting must be held within three weeks of the date of the letter. Any adverse action SHA 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 reschedule or attend the meeting.

Tenants who feel aggrieved because of adverse action taken by SHA are entitled to a grievance hearing according to procedures outlined in 760 CMR 6.08.

REPORTING ADVERSE ACTIONS TO DHCD

SHA will report to DHCD any adverse actions they take for each tenant, such as evictions or termination proceedings, rent increases, or rent repayment arrangements. Cases that have been cleared will not be reported to DHCD.

Approved by the Stockbridge Housing Authority Board of Commissioners on 03/06/07.