



July 6, 2026

U.S. Department of Housing and Urban Development
Office of the Executive Secretariat
451 7th St. SW, Room 10139
Washington, DC 20410-0001

Re: Privacy Act of 1974; System of Records [Docket No. FR-7106-N-18]¹

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), the Public Housing Authorities Directors Association (PHADA), the National Leased Housing Association (NLHA), the Council of Large Public Housing Authorities (CLPHA), and the Housing and Development Law Institute (HDLI) (collectively the Industry Groups), we are pleased to offer the following comments in response to the notice titled “Privacy Act of 1974; System of Records” (Docket No. FR-7106-N-18), published in the Federal Register on June 5, 2026.

The Industry Groups represent thousands of housing providers that provide housing to millions of federally assisted families.

This comment letter notes procedural and substantive deficiencies in HUD’s actions related to the Enterprise Income Verification Systematic Alien Verification for Entitlements (EIV-SAVE) tenant matching report that this System of Records notice (SORN) details. The Industry Groups’ primary objection is that the EIV-SAVE tenant matching report was in use months before this SORN was published in violation of the Privacy Act of 1974 (Privacy Act). For this reason, and certain other reasons detailed below, the Industry Groups ask HUD to halt the use of the EIV-SAVE tenant matching report. The Industry Groups also provide steps that HUD may take to come into compliance with the law.

Industry Group Comments

Procedural Defects

The Department should withdraw this SORN because of procedural defects in how it implemented the EIV-SAVE tenant report.

Privacy Act of 1974

The Privacy Act, as amended, requires that federal agencies provide 30 days for interested stakeholders to provide written comments *before* a system of records with new or intended uses is established or revised. It states that “[e]ach agency that maintains a system of records . . .” must meet certain requirements.² One requirement is to “. . . publish in the Federal Register upon establishment or revision a notice of the existence and character of the system of records . . .”³ Additionally, “. . . at least 30 days

¹ All citations are informal.

² 5 U.S.C. § 552a(e).

³ 5 U.S.C. § 552a(e)(4).

prior to publication of information under [the previous sentence], publish in the Federal Register notice of any new use or intended use of the information in the system, and provide an opportunity for interested persons to submit written data, views, or arguments to the agency”⁴

The Department failed to follow the requirements of the Privacy Act in this instance. As detailed below, both HUD’s Office of Public and Indian Housing and HUD’s Office of Housing were using and requiring housing agencies to use the EIV-SAVE tenant matching report before the mandated comment period for the system of records.

Office of Public and Indian Housing

On January 22, 2026, HUD sent a guidance letter in the form of an email to housing agencies.⁵ The letter states that the “. . . EIV-SAVE Tenant Matching Report, cross references Inventory Management System/PIH Information Center (IMS/PIC) data with U.S. Citizenship and Immigration Services (USCIS) Systematic Alien Verification for Entitlements (SAVE) data. The letter also states that “[w]ithin the next 30 days, [housing agencies] must review the report, verify that [the agency has] accurately reported individuals’ citizenship/immigration status on the HUD-50058, and initiate corrective actions, as necessary.”

On March 9, 2026, HUD sent an email to housing agencies providing additional information on the EIV-SAVE report.⁶ The letter again stated that the “. . . [EIV-SAVE tenant matching report] cross references HUD public housing and Section 8 tenant information, as reported on Form-50058, with U.S. Citizenship and Immigration Services (USCIS) data on tenants’ citizenship and immigration status.”

On May 6, 2026, HUD sent another email to housing agencies.⁷ The email stated that “. . . HUD has refreshed the EIV-SAVE Tenant Matching Report with new SAVE responses and IMS/PIC data from April 2026.” The Department also stated that “PHAs should review the list, verify that they have accurately reported individuals’ citizenship or immigration status on the HUD-50058, and initiate corrective actions as appropriate.” The email stated that “. . . HUD will require PHAs to attest that they have reviewed the citizenship or immigration status of the identified individuals on the EIV-SAVE Tenant Matching Report and have verified their eligibility for federal Public Housing and/or Housing Choice Voucher assistance consistent with Section 214 of the Housing and Community Development Act of 1980 and implementing regulations at 24 CFR part 5 subpart E.”

On June 4, 2026, HUD sent another email to housing agencies.⁸ This email provided instructions on how housing agencies could attest “. . . that they have reviewed the citizenship or eligible immigration status of the identified individuals on the EIV-SAVE Tenant Matching Report.” It stated that housing agencies had to attest that they had reviewed the new report by August 3, 2026.

⁴ 5 U.S.C. § 552a(e)(11).

⁵ Email from HUD on January 22, 2026. See Appendix A. Text of the email can be accessed at <https://www.hud.gov/sites/default/files/PIH/documents/PHA-Letter-on-EIV-Report.pdf>.

⁶ Email from HUD on March 9, 2026. See Appendix A. Text of the email can be accessed at <https://www.nahro.org/wp-content/uploads/2026/03/HUD-EIV-SAVE-Guidance-Email-March-2026.pdf>.

⁷ Email from HUD on May 6, 2026. See Appendix A. Text of the email can be accessed at <https://www.nahro.org/wp-content/uploads/2026/05/HUD-EIV-SAVE-Guidance-Update-5-6-2026.pdf>.

⁸ Email from HUD on June 4, 2026. See Appendix A. Text of the email can be accessed at <https://www.nahro.org/wp-content/uploads/2026/06/Attestation-Follow-Up-Letter-6-4-2026.pdf>.

Office of Housing

HUD's Office of Housing sent an electronic bulletin on May 21, 2026.⁹ The bulletin stated "The EIV-SAVE Tenant Matching Report is a point in time report which cross-references HUD-50059 tenant data submitted to HUD's Tenant Rental Assistance Certification System (TRACS) with information in U.S. Citizenship and Immigration Services (USCIS)'s Systematic Alien Verification for Entitlements (SAVE) system to produce an initial verification response." [Footnotes omitted.] It also states that ". . . Owners/Agents must access the EIV-SAVE Tenant Matching Report in EIV for each project with an identified discrepancy and resolve all discrepancies"

The Department published the SORN on June 5, 2026. It acknowledged that the SORN was published after the system had been in use by stating it was ". . . reflecting system updates, including implementation of a new Systematic Alien Verification for Entitlements (SAVE) Report and replacement of the Income Discrepancy Report with the Income Validation Tool (IVT) built on the MicroStrategy platform."¹⁰ In stating that the SORN was "reflecting system updates," it was implying that the systems are already in use.

The Department's written instructions to housing agencies, owners, and operators to use the EIV-SAVE tenant matching report were sent before the publication of the SORN informing the public of the EIV-SAVE report. In this way, the Department failed to follow the Privacy Act's requirement of a 30-day comment period before a modification of a system of records.

HUD Privacy Handbook Rev. 1.0

The Department's privacy handbook requires a 30-day comment period for a SORN before a new or modified system of records is used. The handbook states that "[t]he Department shall not disclose any records pursuant to a new or modified routine use until after the 30-day comment period has ended and the department has considered any comment from the public and determined that no further modifications are necessary."¹¹ The analysis of how the Department violated the Privacy Act also applies in illustrating how the Department is violating the HUD Privacy Handbook.

OMB Circular A-108

The Office of Management and Budget's Circular A-108 requires a 30-day comment period for a SORN before the new or modified system of records is used. The OMB Circular states the following:

General. The Privacy Act requires agencies to publish a SORN in the *Federal Register* describing the existence and character of a new or modified system of records. A SORN is comprised of the *Federal Register* notice(s) that identifies the system of records, the purpose(s) of the system, the authority for maintenance of the records, the categories of records maintained in the system, the categories of individuals about whom records are maintained, the routine uses to which the records are subject, and additional details about the system. The requirement for agencies to publish a SORN allows the Federal Government to accomplish one of the basic objectives of the

⁹ Bulletin from HUD on May 21, 2026. See Appendix A. The bulletin may also be found at <https://content.govdelivery.com/accounts/USHUDFHA/bulletins/4185e7c>.

¹⁰ 91 Fed. Reg. 34,245, <https://www.federalregister.gov/d/2026-11295/p-3>.

¹¹ U.S. Department of Housing and Urban Development, HUD Privacy Handbook 1325.1 REV. 1.0, 10/18/2021, <https://www.hud.gov/sites/dfiles/OCHCO/documents/privacy-handbook-2021.pdf>, p. 33.

Privacy Act – fostering agency accountability through public notice. [Footnotes omitted.]¹²

The OMB circular also states that “[a]ny new or significantly modified routine uses require a minimum of 30 days after publication in the *Federal Register* before the routine uses are effective and may be used as the basis for disclosure of a record in the system.”¹³ The OMB circular continues with the following:

Agencies shall publish notice of any new or significantly modified routine use sufficiently in advance of the proposed effective date of the routine use to permit time for the public to comment and for the agency to review those comments. In no circumstance may an agency use a new or significantly modified routine use as the basis for a disclosure fewer than 30 days following *Federal Register* publication.¹⁴

The analysis of how the Department violated the Privacy Act also applies in illustrating how the Department is violating OMB Circular A-108.

Administrative Procedure Act

The Administrative Procedure Act prohibits agency actions that are “. . . contrary to law.”¹⁵ As noted above, the use of the EIV-SAVE tenant matching report before publishing a SORN and considering written comments is contrary to law (i.e., the Department’s actions violated the Privacy Act). As such, it also violates the Administrative Procedure Act and is subject to judicial review.

Substantive Defects

HUD lacks the authority to use the EIV-SAVE tenant matching report on U.S. citizens or nationals or people at or over the age of 62.

The Housing and Community Development Act of 1980 Does Not Give HUD the Authority to Require that United States Citizens or People 62 or Older Be Subject to a Systematic Alien Verification for Entitlements (SAVE) Search

The Housing and Community Development Act of 1980, as amended, does not give HUD the authority to subject United States citizens or nationals or people at or over the age of 62 to a SAVE search. Section 214 of the Housing and Community Development Act of 1980 is the relevant section that authorizes HUD to verify immigration status. The statute states the following:

If the declaration states that the individual is not a citizen or national of the United States and that the individual is younger than 62 years of age, the declaration shall be verified by the Immigration and Naturalization Service.¹⁶

The statute clearly states that Immigration and Naturalization Service may only verify the status of people

¹² Office of Management and Budget, Circular No. A-108, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A108/omb_circular_a-108.pdf, p. 5.

¹³ Office of Management and Budget, Circular No. A-108, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A108/omb_circular_a-108.pdf, p. 7.

¹⁴ Office of Management and Budget, Circular No. A-108, https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A108/omb_circular_a-108.pdf, p. 7.

¹⁵ 5 U.S.C. § 706(2)(A). The language of the APA states that a “. . . reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . not in accordance with law”

¹⁶ 42 U.S.C. § 1436a(d)(1)(A).

who are not citizens or nationals of the United States and who are younger than the age of 62 in the context of determining eligibility for federal rental assistance programs.¹⁷

For U.S. citizens or nationals, section 214 authorizes housing agencies to take different actions. The statute states the following:

If the declaration states that the individual is a citizen or national of the United States, the applicable Secretary,¹⁸ or the agency administering assistance covered by this section, may request verification of the declaration by requiring presentation of documentation that the applicable Secretary considers appropriate, including a United States passport, resident alien card, alien registration card, social security card, or other documentation.¹⁹

It does not authorize a SAVE search (or a verification by the Immigration and Naturalization Service) but instead authorizes a housing agency to require the presentation “. . . of documentation that the [HUD] Secretary considers appropriate, including a United States passport, resident alien card, alien registration card, social security card, or other documentation.”²⁰

Section 214 does state that a housing agency “shall have access to any relevant information contained in the SAVE system (or any successor thereto) that relates to any individual or family applying for financial assistance.”²¹ Nonetheless, information for U.S. citizens or nationals or people at or over the age of 62 is not relevant information for verification because their verification can occur absent SAVE searches. HUD can ensure that housing agencies have access to relevant information contained in the SAVE system by ensuring that housing agencies have access to the SAVE system to verify individuals (on a case-by-case basis) who are under the age of 62 and have declared that they have eligible immigration status.

By subjecting U.S. citizens and nationals and people under the age of 62 to unauthorized SAVE searches, the Department is acting contrary to section 214 of the Housing and Community Development Act of 1980, as amended.

Privacy Act of 1974

The Privacy Act states that “[n]o agency shall disclose any record which is contained in a system of records by any means of communication . . . to another agency, except pursuant to a written request by, or with

¹⁷ It is not clear if a SAVE search conducted by the Department of Homeland Security is the same as having a declaration verified by the Immigration and Naturalization Service, but for the purposes of this comment letter, we will give the most generous possible reading to HUD and assume that they are synonymous.

¹⁸ Please note that this does not authorize HUD to request this additional documentation. Section 214 also states that “. . . financial assistance for any individual receiving such assistance . . . is to be terminated, the public housing agency or other local governmental entity involved (in the case of public housing or assistance under section of the United States Housing Act of 1937) or the applicable Secretary (in the case of any other financial assistance) shall take one of the following actions . . .” 42 U.S.C. § 1436a(c)(1). In the case of public housing or assistance under section 8, the entity that may request verification of the declaration is the agency administering assistance (i.e., the housing agency or the project-based rental assistance owner) not HUD. The statute empowers the entity administering the assistance to make the decision about whether to request additional documentation beyond the self-certification required for citizens.

¹⁹ 42 U.S.C. § 1436a(d)(1)(A).

²⁰ 42 U.S.C. § 1436a(d)(1)(A).

²¹ 42 U.S.C. § 1436a(i)(2)(B)(iii).

the prior written consent of, the individual to whom the record pertains . . . ”²² A record is defined as any “. . . item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, his education, financial transactions, medical history, and criminal or employment history and that contains his name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph.”²³ There are certain exceptions. One exception is a “routine use” which is a “disclosure of a record, the use of such record for a purpose which is compatible with the purpose for which it was collected.”²⁴

In its SORN, HUD states that certain disclosures shall be considered a routine use. One of the disclosures for the Inventory Management System/Public Housing Information Center (IMS/PIC) and the Tenant Rental Assistance Certification System (TRACS) is “[t]o the Department of Homeland Security . . . their respective employees and agents, for the purpose of conducting matching programs to verify initial or continued eligibility for HUD rental assistance programs . . . ” As noted above, section 214 of the Housing and Community Development Act of 1980 does not require nor authorize HUD to conduct SAVE searches for U.S. citizens or nationals or people at or over the age of 62 for the purposes of verifying eligibility for federal rental assistance programs. Therefore any disclosures of IMS/PIC or TRACS data for those categories of people do not fall within the “routine use” exception of the Privacy Act. For those categories of people, disclosing those records to the Department of Homeland Security does not further any eligibility verification purposes and disclosure of the records is not compatible with the eligibility verification purpose for which the data were collected. In those instances, the Privacy Act’s general prohibition of sharing records absent prior written consent stands.

As always, the Industry Groups wish to work collaboratively with HUD. If the Department wishes to implement this policy, we recommend that it take the following steps:

1. Halt the use of the EIV-SAVE tenant matching report and the required review attestation;
2. Withdraw this SORN and the Department’s mixed-status families proposed rule;
3. Work with Congress to amend the necessary statutes to ensure that HUD has the substantive authority to take these steps; and
4. Once all the relevant statutes have been amended giving HUD additional authority, HUD should carefully follow all the requirements (including allowing for the necessary written comment periods before agency actions are taken) of the Administrative Procedure Act, the Privacy Act, and any other statute that may impose procedural requirements when crafting regulations and implementing new systems.

Following these four steps will bring HUD into compliance with the law and ensure that any regulation or new or modified system of records that it wishes to enact will be done lawfully.

²² 5 U.S.C. § 552a(b).

²³ 5 U.S.C. § 552a(a)(4).

²⁴ 5 U.S.C. § 552a(a)(7), (b)(3).

The Industry Groups thank the Department for the opportunity to share these comments. If the Department has any questions or comments on these points or any other issue, please feel free to reach out to Tushar Gurjal at tgurjal@nahro.org.

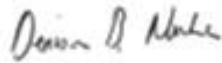
Sincerely,



Mark Thiele,
CEO,
National Association of Housing and
Redevelopment Officials (NAHRO)



Crystal Wojciechowski,
Executive Director,
Public Housing Authorities Directors Association
(PHADA)



Denise B. Muha,
Executive Director,
National Leased Housing Association (NLHA)



La Shelle Dozier,
Executive Director,
Council of Large Public Housing Authorities
(CLPHA)



Lisa L. Walker,
CEO And General Counsel,
Housing and Development Law Institute (HDLI)

Appendix A
Text of the Emails and Bulletins Sent to Housing Providers on EIV-SAVE



**U.S. DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT**

WASHINGTON, DC 20410-5000

Assistant Secretary for Public and Indian Housing

Dear Executive Director,

Please see below an important communication requiring your prompt attention and response.

In a [letter sent to Executive Directors on December 16, 2025](#), I reminded you of PHAs' legal obligations under Section 214 of the Housing and Community Development Act of 1980 (Section 214) and President Trump's Executive Order 14218, *Ending Taxpayer Subsidization of Open Borders*, to verify the citizenship and immigration status of all individuals prior to admission to the Public Housing or Housing Choice Voucher programs. I also mentioned that HUD was developing a new report in the Enterprise Income Verification system (EIV) to assist PHAs in determining when additional verification of immigration status may be necessary. Today, I am writing to inform you that this new EIV report is now available, and that PHAs are required to utilize it and take all necessary action within the next 30 days, as directed below.

The new EIV report, **EIV-SAVE Tenant Matching Report**, cross references [Inventory Management System/PIH Information Center](#) (IMS/PIC) data with U.S. Citizenship and Immigration Services (USCIS) [Systematic Alien Verification for Entitlements](#) (SAVE) data. The report includes a list of individuals whose citizenship or eligible immigration status needs to be confirmed by the PHA, due to possible discrepancies between what appears in SAVE and what has been provided for the individual on the HUD-50058 (line 3i). The report includes individuals for whom a SAVE initial verification response indicates they may be ineligible for HUD assistance or more information is required to classify the individual's immigration status (see Appendix A of the letter from December 16, 2025). This could include individuals whom the PHA determined were Eligible Citizens but who are identified by SAVE as potentially ineligible. If the PHA has already determined the individual is an Ineligible Noncitizen, they are not included in the report.

Inclusion on this report does not automatically mean that an individual is ineligible for HUD assistance. Rather, as noted in the letter from December 16, 2025, in some cases more information is required to classify the individual's immigration status (e.g., by seeking additional verification in SAVE, reviewing Class of Admission codes in SAVE, and requesting further documentation). Since PHAs are required to obtain the information necessary to determine eligibility for HUD assistance prior to admitting an individual, you should already have any additional verification documented in tenant records.

Within the next 30 days, your PHA must review the report, verify that you have accurately reported individuals' citizenship/immigration status on the HUD-50058, and initiate appropriate corrective actions, as necessary. For each individual, PHAs should confirm, as needed, that:

- The PHA has sought additional verification from SAVE to verify eligible immigration status.
- The PHA has retained documentation in the tenant file that confirms the individual's citizenship or eligible immigration status (e.g., documentation and SAVE verification).
- The PHA has correctly coded the individual on the HUD-50058.

For any individual whose citizenship/immigration status is incorrectly reported on the HUD-50058, PHAs must immediately initiate an appropriate corrective action. This would include submitting a corrected HUD-50058 to PIC. If an individual is determined to be ineligible for HUD assistance, PHAs may be required to initiate termination of assistance, depending on the overall makeup of the household.

Compliance with the new report will be monitored. PHAs that fail to use EIV reports in accordance with established requirements may be subject to sanctions. Sanctions may include but are not limited to issuance of a corrective action order; reimbursement from non-HUD sources; withholding or reducing funding, or any other available corrective action or sanction as HUD deems necessary.

The new report will appear as an option within the Income Validation Tool (IVT) Report in the EIV system. [Attached](#) are step-by-step instructions on how to access the report.

If you have additional questions, please direct them to the EIV Help Desk at EIV_Help@hud.gov.

Sincerely,



Benjamin R. Hobbs
Assistant Secretary
Office of Public and Indian Housing



OFFICE OF PUBLIC & INDIAN HOUSING

March 9, 2026

Dear Executive Director,

On January 22, 2026, HUD sent a [letter to public housing agencies](#) (PHAs) announcing the publication of the **EIV-SAVE Tenant Matching Report (EIV-SAVE Report)**. This report cross references HUD public housing and Section 8 tenant information, as reported on Form HUD-50058, with U.S. Citizenship and Immigration Services (USCIS) data on tenants' citizenship and immigration status.

The January letter required PHAs to review the EIV-SAVE Report, verify the citizenship and immigration status of individuals identified on the report is correctly reported on the HUD-50058, and initiate any appropriate corrective actions by February 21, 2025. While some corrective actions may take longer to complete, HUD expects all PHAs, including Moving to Work (MTW) PHAs, to have reviewed the EIV-SAVE Report and initiated any appropriate corrective actions at this time. PHAs should maintain documentation of their review, as it may be requested by HUD.

HUD has received numerous questions about what actions a PHA should take based on the information contained in the EIV-SAVE Report. HUD intends to publish an FAQ document in March with further guidance.

Below are some common examples of actions taken by a PHA after reviewing the EIV-SAVE Report and comparing it to tenant files and the HUD-50058 of record:

- The PHA confirms they have the appropriate documentation in accordance with HUD requirements (see 24 CFR part 5, subpart E), and no further verification or changes to a tenant's HUD-50058 are needed.
- The PHA identifies typographical errors or other minor corrections and submits an updated HUD-50058.

- The PHA submits additional documentation into SAVE to confirm the individual's status. See the [documentation from USCIS](#) on how to submit such information.
- The PHA determines an individual's citizenship or immigration status was incorrectly reported to HUD in the Inventory Management System/PIH Information Center (IMS/PIC) and submits an updated HUD-50058.

Note that the data on the EIV-SAVE Report does not refresh, and an individual will remain on the report even after corrective actions are completed. Also, some MTW Expansion PHAs may not be able to submit corrective HUD-50058s into IMS/PIC at this time and should maintain their own internal tracking of HUD-50058 changes.

For questions about how to understand the EIV-SAVE Report's "SAVE Initial Verification Status" column, PHAs can find guidance once logged into the SAVE system on the [USCIS website](#). In particular, HUD recommends the most recent version of the "Guide to Understanding SAVE Verification Responses" on the Resources page.

Please refer to the [December 2025 letter](#) for HUD guidance on the relationship between SAVE statuses and eligibility for federal housing assistance under Section 214 of the Housing and Community Development Act of 1980.

Thank you for helping to ensure that HUD's programs are compliant with federal law and that we are only assisting eligible individuals.

Sincerely,



Benjamin Hobbs

Assistant Secretary

This message was sent to employees of HUD's Office of Public and Indian Housing.



OFFICE OF PUBLIC & INDIAN HOUSING

May 6, 2026

Dear Executive Director,

I am reaching out to notify Public Housing Agencies (PHAs) of updates for the EIV-SAVE Tenant Matching Report, which cross references Inventory Management System/PIH Information Center (IMS/PIC) data with U.S. Citizenship and Immigration Services (USCIS) Systematic Alien Verification for Entitlements (SAVE) data.

First, HUD has refreshed the EIV-SAVE Tenant Matching Report with new SAVE responses and IMS/PIC data from April 2026. HUD appreciates PHAs who reviewed the report in January 2026 and made corrective actions in IMS/PIC. As a result, some records have been removed from the report. The refresh includes an update to other records, new admissions, and additions to households since the initial release. PHAs should review the list, verify that they have accurately reported individuals' citizenship or immigration status on the HUD-50058, and initiate corrective actions as appropriate. If a PHA has already reviewed and verified an individual's information as part of reviewing the EIV-SAVE Tenant Matching Report published in January, the PHA may only need to confirm that they have undertaken appropriate actions on the basis of that verification.

Second, HUD will require PHAs to attest that they have reviewed the citizenship or immigration status of the identified individuals on the EIV-SAVE Tenant Matching Report and have verified their eligibility for federal Public Housing and/or Housing Choice Voucher assistance consistent with Section 214 of the Housing and Community Development Act of 1980 and implementing regulations at 24 CFR part

5 subpart E. HUD will provide instructions on how to submit this attestation within the next two weeks, and PHAs will be required to submit this attestation within 60 days after being provided instructions.

Finally, HUD is issuing a [Frequently Asked Questions \(FAQ\) document](#) for reviewing and responding to the EIV-SAVE Tenant Matching Report.

Thank you for your partnership and continued diligence to ensure HUD assistance is only delivered to eligible individuals. Please direct questions regarding the EIV-SAVE Tenant Matching Report to VerificationQuestions@hud.gov.

Sincerely,



Benjamin Hobbs
Assistant Secretary

This message is from HUD's Office of Public and Indian Housing.

Public housing agency primary contact information is retrieved from the Inventory Management System/PIH Information Center (IMS/PIC) each week. In addition, users may [subscribe to HUD lists](#) and/or [manage their subscriptions](#).

Thank you for furthering HUD's mission in the communities you serve.



OFFICE OF PUBLIC & INDIAN HOUSING

June 4, 2026

Executive Director,

I am following up on my [May 6 letter](#) announcing the availability of the latest EIV-SAVE Tenant Matching Report. In the May 6 letter, I alerted that HUD would require PHAs to attest that they have reviewed the citizenship or immigration status of the identified individuals on the EIV-SAVE Tenant Matching Report. This follow-up letter provides instructions on how to attest that you have verified those individuals' citizenship or eligible immigration status, consistent with section 214 of the Housing and Community Development Act of 1980, and implementing regulations at 24 CFR part 5, subpart E.

Using the instructions below, PHA executive directors, or other authorized PHA officials, will submit their attestation electronically to HUD through DocuSign by **August 3, 2026**.

Process to Submit an Attestation

PHA executive directors, or other authorized PHA officials, will:

1. Visit [DocuSign](#)
2. Complete the following fields:
 - PHA Code
 - PHA Name
 - Submitter Name

- Submitter Job Title
- Submitter Email

3. Click the attestation button to affirm the provided statement:

I confirm, on behalf of [PHA Name], that staff has reviewed the EIV-SAVE Tenant Matching Report dated April 10, 2026, reviewed the citizenship or eligible immigration status of the identified individuals, and has verified their citizenship or eligible immigration status, consistent with section 214 of the Housing and Community Development Act of 1980, and implementing regulations at 24 CFR part 5, subpart E.

The date of signature will be added automatically. After reviewing, select *Finish*. At this point, you may save a copy for your records. DocuSign will automatically send acknowledgment of receipt to the submitter's email address.

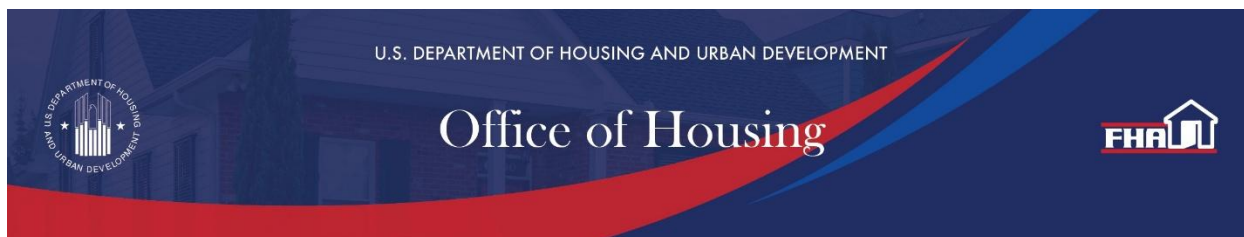
Thank you for your diligence and attention to ensuring our programs continue to serve eligible families. Please direct any questions regarding the EIV-SAVE Tenant Matching Report or the required attestation to VerificationQuestions@hud.gov.

Sincerely,



Benjamin Hobbs
Assistant Secretary

[View PDF Version](#)



EIV Citizenship Verification Tool

Office of Housing sent this bulletin at 05/21/2026 01:42 PM EDT

Having trouble viewing this email? [View it as a Web page.](#)



EIV Citizenship Verification Tool

Dear Owners/Agents:

Please note that the below communication requires Owners/Agents to act on information in HUD's Enterprise Income Verification (EIV) system within 30 calendar days of today's date.

In a [letter sent to Owners/Agents on January 12, 2026](#), the Department reminded you of your legal obligation to ensure that Section 8 Project-Based Rental Assistance (PBRA) is provided only to U.S. citizens and noncitizens who have eligible immigration status^[1]. That letter also reaffirmed the procedures you must take to verify PBRA applicant citizenship/eligible immigration status and how to calculate prorated assistance for mixed-status families^[2].

Today, HUD's Office of Multifamily Housing Programs released a new EIV project-level report for Owners/Agents to assist in identifying potential tenant eligibility discrepancies using available federal citizenship and immigration information.

EIV-SAVE Tenant Matching Report

The **EIV-SAVE Tenant Matching Report** is a point in time report which cross-references HUD-50059 tenant data submitted to HUD's Tenant Rental Assistance Certification System (TRACS) with information in U.S. Citizenship and Immigration Services (USCIS)'s [Systematic Alien Verification for Entitlements](#) (SAVE) system[3] to produce an initial verification response[4].

This report is designed to include tenants who have a potential discrepancy between their citizenship/eligible immigration status listed in TRACS and the information in SAVE. The Owner/Agent must review these discrepancies and ensure tenant eligibility in accordance with Attachment A.

At the time of this communication, the EIV-SAVE Tenant Matching Report is a one-time report. In its current state, a tenant will not actually be removed from the report until HUD publishes an updated report. In the future, HUD may provide an updated report on a routine basis.

To access this report in EIV and review a sample of the **EIV-SAVE Tenant Matching Report (including an explanation of the report's data fields)**, please refer to the instructions outlined in Attachment A.

Owners/Agents can only access EIV-SAVE Tenant Matching Reports for their assigned projects and must have access to EIV to review the report. Please email MFH_EIV@hud.gov for assistance with EIV access and EIV project assignments.

References:

[1] Section 214 of the Housing and Community Development Act of 1980 and Executive Order 14218, *Ending Taxpayer Subsidization of Open Borders*.

[2] *Mixed family*, as defined in 24 CFR § 5.504, means a family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.

[3] SAVE is an online information service that provides point in time immigration status and U.S. citizenship information to federal, state, local, territorial, and tribal agencies.

[4] Initial verification is the first step in determining an individual's eligibility for federal benefits. Initial verification electronically compares the information from HUD against immigration records available to the Department of Homeland Security and returns a response within seconds.

Required Owner/Agent Actions within the Next 30 Days

Within the next 30 calendar days, Owners/Agents must access the EIV-SAVE Tenant Matching Report in EIV for each project with an identified discrepancy and resolve all discrepancies by performing the step-by-step actions described in Attachment B. Please thoroughly review attachments A and B prior to taking any action. Please note, not all projects have tenant discrepancies, so some Owners/Agents will find that they have no reports to review or that they have fewer reports to review than the number of projects that they own/manage. If a project does not have a report, then there are no discrepancies for the Owner/Agent to resolve.

This action will verify **1) that tenant data submissions to TRACS are error free and 2) that Owners/Agents obtained the required citizenship/eligible immigration documentation for all tenants in accordance with HUD's regulations in 24 CFR Part 5, Subpart E**. The Department believes that many of the discrepancies noted on the report can be resolved by correcting data entry errors in HUD-50059 submissions, but others will require more in-depth investigation.

Importantly, a tenant's inclusion in the report **does not definitively** mean that they are ineligible for assistance. Owners/Agents may not deny or end an individual's assistance based on discrepancies noted in the report that require further action or resubmission to SAVE. If an Owner/Agent determines that a tenant is ineligible for assistance **after** following all required steps in Attachment B, they must allow for an appeal and informal hearing per 24 CFR § 5.514 **before** terminating or prorating the tenant's assistance.

If a tenant believes that their record at a federal agency contains errors or needs to be updated, the individual **must** contact the agency that maintains the record, such as the [Social Security Administration](#) or [U.S. Citizenship and Immigration Services](#). It is important to note that SAVE is a database tool and it cannot correct source records.

Please note that tenants classified as ineligible noncitizens in TRACS are not currently assisted under PBRA and are excluded from the EIV-SAVE Tenant Matching Report.

HUD recommends that owners/agents use all available resources to learn more about SAVE and its capabilities, including the following webpages:

- <https://www.uscis.gov/save>
- [SAVE Records Fast Facts for Benefit Applicant](#) (provides more information on records updates and corrections).
- [SAVE Tutorial: Introduction to SAVE and the Verification Process for SAVE Users](#)
- [SAVE Guidance](#)

Owner/Agent Compliance

Owners/Agents should complete the steps in Attachment B for each tenant with an identified discrepancy. Aside from submitting corrected HUD-50059s and adjustments to Housing Assistance Payment (HAP) vouchers when appropriate, Owners/Agents do not need to submit additional follow up information. HUD will monitor EIV-SAVE Tenant Matching Report usage and may request information from an Owner/Agent as necessary.

Failure to perform the steps outlined in this letter may result in [EIV penalties per Handbook 4350.1, REV-1](#), Ch. 9-19 and/or [Active Partners Participation System \(APPS\)](#) compliance flags for the Owner/Agent.

We sincerely appreciate your ongoing collaboration and commitment to ensuring that HUD assistance is provided only to eligible individuals and families. Please direct your EIV and SAVE questions to the following email boxes:

- EIV-SAVE Tenant Matching Report: MFH_SAVE@hud.gov
- EIV access and project assignments: MFH_EIV@hud.gov
- SAVE registration: MFH_SAVE@hud.gov
- SAVE password reset: <https://secure.login.gov/>

Please do not email USCIS with requests for account registration or password updates. USCIS **does not** manage HUD SAVE accounts.

References:

See Housing Notice 2016-15: [Processing Guide for Previous Participation Reviews of Prospective Multifamily Housing and Healthcare Programs' Participants](#)

Attachment A: How to Navigate the EIV-SAVE Tenant Matching Report

Select **USCIS-SAVE System** under **External Links** on the EIV home page:



Note: This link previously redirected users to SAVE; this link now directs users to the EIV-SAVE Tenant Matching Report.

Click on the drop-down menus to select either a **Contract Number** or a **Project Number**. Please note, your drop-down list will only contain properties you manage in EIV that have one or more tenants identified with discrepancies. If a project does not show up on the list, it does not have any identified discrepancies.

Next, click **Get Report**.



Enterprise Income Verification EIV MF-SAVE Tenants Matching Report

Select Contract Number

[Get Report](#)

Select Project Number

[Get Report](#)

Below is a sample **MF EIV-SAVE Tenant Matching Report** for an individual project. Please note, the report will only contain tenants with identified discrepancies. Many impacted contracts will have a small number of tenants (five or less). The date in the top right corner of the page is the date that the TRACS data was cross-referenced with SAVE information.

Select **[Back to EIV MF-SAVE Navigation](#)** to get back to the main page. From here, owners/agents can select a different Contract Number or Project Number to review.



MF EIV-SAVE Tenant Matching Report

Report updated as of 4/22/2026

[Back to EIV MF-SAVE Navigation Page](#)

Contract Number

Property ID

Project Number

Head of Household SSN

Member SSN

Member First Name

Member Last Name

Tenant Details

Contract Number	Project Number	Property ID	Head of Household SSN	Effective Date	Subsidy Type Code	Member SSN	First Name	Last Name	Unit Address	USCIS Response
			xxx-xx-xx	2/1/2026	H1	xxx-xx-2181				Immigration Enumerator Required - Resubmit with Additional Information

Explanation of Data Fields:

Contract Number: A project's unique 11-character number assigned by HUD for the purpose of identifying the project's rental assistance contract.

Project Number: A project's unique 8-character number assigned by HUD for the purpose of identifying the project's loan.

Property ID: The property's unique 9-digit ID assigned by HUD in its portfolio database, the integrated Real Estate Management System (iREMS).

Head of Household SSN: The last 4 digits of the head of household's Social Security Number.

Effective Date: The effective date of the income recertification (HUD-50059) from which tenant data was cross-referenced with SAVE information.

Subsidy Type Code: The subsidy type code entered into the family's HUD-50059. For example, H1 = Section 8; H4 = 236.

Member SSN: The last 4 digits of the family member's Social Security Number whose TRACS data is potentially discrepant with their information in SAVE.

First Name: The family member with the potential discrepancy's first name.

Last Name: The family member with the potential discrepancy's last name.

Unit Address: The family's unit address in the project. This information will populate from the form HUD-50059 if it was entered by the owner/agent.

USCIS Response: The initial verification response returned for the family member by SAVE.

Attachment B: Step-by-Step Instructions to Resolve Discrepancies in the EIV-SAVE Tenant Matching Report

Note: Owners/Agents must ensure they have both EIV **and** SAVE access **before** completing the following steps. Certain SAVE resources can only be accessed when a user is logged in.

Step 1: Log in to SAVE and navigate to Help>Resources to find the ***Guide to Understanding SAVE Verification Responses***. Locate the "Initial Verification Responses" section of the Guide to assist with interpreting the USCIS Responses listed in the EIV report.

Step 2: Log in to EIV and navigate to the USCIS-SAVE System report under “External Links”. Select a contract or project number to review. **Note:** Only properties with tenant discrepancies will have reports available to review.

Step 3: Find the USCIS Response (last column of the report) for each tenant listed in the project’s report. *If the tenant is no longer receiving assistance or no longer lives at the property, then no further action is necessary.*

Step 4: Confirm that the tenant’s file contains acceptable evidence of eligible immigration status required by 24 CFR § 5.508 *and* prior SAVE verification results (including Class of Admission (COA)[\[1\]](#)) if applicable. See the table below for a description of acceptable evidence based on an individual’s citizenship or immigration status.

If acceptable evidence does not exist in the tenant file, then the owner/agent must obtain the required evidence and verify the tenant’s eligible immigration status per 24 CFR § 5.512.

References:

[\[1\]](#) COA refers to a specified single category of admission to a lawful immigration status

Citizenship/Immigration Status	Required Evidence of Citizenship or Eligible Immigration Status
U.S. citizens or U.S. nationals	Signed declaration of U.S. citizenship or U.S. nationality

	• Owners may require applicants/residents to provide verification of citizenship
Noncitizens who are 62 or older at the time of admission	• Signed declaration of eligible immigration status • Proof of age document
All other noncitizens	• Signed declaration of eligible immigration status • An original document designated by DHS as acceptable evidence of immigration status in one of the six categories in § 5.506(a) for the specific immigration status claimed by the individual • Verification consent form
Individuals who do not contend immigration status Note: <i>These individuals will not be listed in the EIV-SAVE Tenant Matching Report</i>	• The family must identify in writing to the owner/agent the family member (or members) who do not contend that they have eligible immigration status.

Step 5: Verify that the tenant's biographic information in *Section C. Household Information* of the HUD-50059 (e.g., name, date of birth, relationship code, citizenship status, Social Security Number, alien registration number, etc.) is correct based on tenant file documents. Owners/agents must immediately correct any data entry errors by transmitting a corrected HUD-50059 to TRACS.

Note: Do not use dashes when entering an individual's alien registration number into the HUD-50059. For example, if an alien registration number is A-123-456-789, enter the alphanumeric number as A123456789.

Step 6: If steps 4 and 5 do not resolve the discrepancy between the information for a tenant listed in the EIV-SAVE Tenant Matching Report and the acceptable evidence of eligible immigration status provided by the tenant, then the Owner/Agent may create a new SAVE case using a full nine-digit Social Security Number (SSN) and/or immigration enumerator (such as an A-Number/USCIS Number, Arrival-Departure Record I-94 Number, SEVIS ID Number, Naturalization/Citizenship Certificate Number, or Visa Number) to determine the tenant's citizenship/eligible immigration status. If the Owner/Agent determines that the tenant does not have citizenship or eligible immigration status based on the previous steps, the owner/agent must follow HUD's regulations at 24 CFR § 5.514 prior to reducing or terminating a family's assistance, after obtaining a signed verification consent form from the tenant, or an adult residing in the unit if the tenant is a child.

Step 7: Retain the EIV-SAVE Tenant Matching Report in both the project's EIV Master File and in the tenant file, along with notes on actions taken to resolve the discrepancy.
