

**APPENDIX 4 A GUIDE TO INTERVIEWING FOR OWNERS OF
HUD-SUBSIDIZED MULTIFAMILY HOUSING PROGRAMS**

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PART I INTRODUCTION

Owner Responsibilities

- The essence of the responsibility of every owner of a HUD-assisted housing development is to ensure that eligible families lease the correct units and pay the correct amount of rent.
- The most important contributions to the correct determination of eligibility, rent and subsidy are:
 - Correct information provided by the family
 - Effective owner verification and interpretation of the information provided
 - Correct application of HUD regulations and policies by the owner

Correct Information Provided by the Family

- The family must provide complete and accurate information in an initial application and at each interim and annual recertification.
- The family must be willing to disclose the information. But just as important, the family needs to understand what information the owner needs to collect and be given the opportunity to provide the necessary information in a effective way.
- The owner must provide applications and other data collection forms that are user-friendly for family members and for the staff that will assist families to complete them. Staff must learn to be skilled interviewers who can help families understand the requirements, effectively elicit the necessary information, and can ably record the results.

Correct Verification of the Information Provided

- Owners/agents are responsible for verifying the information provided and using it in compliance with HUD requirements and project policies.
- This requires owners to obtain written legal authority from the family to verify all factors that affect eligibility and rent determination. It also requires effective data collection (verification) forms that ask the right questions of third party verification sources. Finally, staff must be able to apply their interviewing skills to conversations with verification sources to clarify or supplement information that has been provided in writing.

Correct Application of HUD Rules and Policies

- Rules for the subsidized housing programs are numerous, and sometimes complex.
- The challenge for owners is to create a system – policies, procedures, questions, formats, interview tools – that adequately reflects the HUD requirements and ensures that the owner follows those requirements fairly and consistently. Owners that rely primarily on a family's voluntary disclosure of information will find that not all applicants, even willing ones, provide complete and accurate information. In addition, all owners do not collect the data needed to achieve the desired results.

PART II KEYS TO SUCCESSFUL INTERVIEWS

Overview

- The guide focuses on the interview process and provides concepts and tools that will aid interviewers in their work.
- The principles discussed in the guide will apply to all formal interview settings such as initial eligibility interviews, interim recertifications and annual recertifications. The primary emphasis will be on the initial eligibility interview because it is so critical to the housing process
- However, it's important to note that good interviewing skills also are helpful in the normal course of doing business. Sound interviewing principles apply when someone calls an owner (or HUD) to report fraud or some type of misconduct. Interview skills are needed in cases when an owner must contact a third party for oral verification or to resolve a discrepancy.
- The ability to interview plays a key role for everyone who must interact with others whether their role is problem solving, providing training, or providing technical assistance.
- To be successful in conducting interviews, owners must have:
 - Well-trained and skilled staff to conduct the interviews
 - Effective tools for data collection and for communication with those to be interviewed
 - An interview methodology that is used by all staff who conduct interviews

The Role of the Interviewer

- Effective interviewers are talented at human interaction. They are the type of people with whom others are willing to share information. This is in part due to the interpersonal environment they create with others.
- During the interview, much pertinent information results from volunteered information, as opposed to just responses to a specific question. Good interviewers display interest in the subject and in what is being said. They do not interrupt with unnecessary questions.

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- Professionalism in the interview often involves a state of mind and a commitment to excellence. The interviewer should be on time, professionally attired, and be fair in all dealings with applicants and housing clients. If the applicant perceives that the interviewer is biased, or is attempting to confirm foregone conclusions, they will be less likely to cooperate.
- Performing this essential role effectively requires the following competencies:
 - Verbal communication skills – ability to explain and answer questions
 - Interpersonal rapport-building skills – ability to create an atmosphere where people are willing to disclose personal information about their circumstances
 - Information-gathering skills – ability to utilize various questioning techniques; ability to frame questions and use progressive questioning techniques
 - Listening skills – ability to employ active and passive listening techniques to validate information and encourage communication
 - Analytic and interpretive skills – ability to analyze information provided by applicants and other information providers
 - Knowledge of HUD regulations and the owner’s policies and the ability to apply them in making eligibility and selection determinations

Tools for Data Collection and Communication

HUD Provided Tools

- HUD specifies certain “tools” that are part of the interview process, and provides instructions to owners for their use. These include various forms and fact sheets, including:
 - HUD-9887, Notice and Consent to the Release of Information to HUD and to a PHA
 - HUD-9887-A, Applicant/Tenant’s Consent to the Release of Information – Verification by Owners of Information Supplied by Individuals who Apply for Housing Assistance
 - HUD-9887 Fact Sheet, describing verification requirements
 - Form HUD-50059 data elements
 - Lead-Based Paint Disclosure (if applicable)
 - Resident Rights and Responsibilities Brochure

Recommended Owner Data Collection Tools

- To a very large degree, owners have the flexibility to design data collection tools and forms that are unique to their projects and tailored to their policies.
- Owners have a need to create data collection forms for various purposes.
 - Owners create forms for initial certifications that incorporate questions reflecting the owner's tenant-selection policies.
 - Owners create verification forms for specific types of income and expenses and forms for the interim reporting of changes and annual recertifications. Handbook 4350.3 REV-1, Appendix 15 offers examples of owner-created verification forms to request information from employers, child care providers, medical professionals and others on specific subjects.
 - Owners may also create forms for other specific purposes such as gathering and processing information in support of an owner's fraud policy.
- All owner-created forms should be designed to be user-friendly and capture all relevant information.

Interview Methodology

C.A.V.E.

- One way of remembering the important purposes of an interview is by using the acronym – C.A.V.E. The interview plays an essential role in:
 - **C**ollection of complete information
 - **A**nalysis of the information to determine verification requirements and to resolve discrepancies
 - **V**erification of the information
 - **E**ducation of applicants and tenants of what is required and how the program works

Collection + Analysis + Verification + Education =
Correct eligibility determinations, tenant selection decisions and correct rent
determinations.

- Effective intake results in the selection of renters who will likely comply with the lease, maintain the housing unit and act as good neighbors. Poor intake results in the admission of problem tenants and ultimately higher costs to owners/agents.

The Four Phases of an Interview

- This guide describes a four phase interviewing process that ensures that each element of a successful interview will be covered. The four phases are:
 - **Phase 1: Transition to the interview** – This phase is used to establish rapport and ground rules for the interview, as well as to educate the person being interviewed
 - **Phase 2: Information Gathering** – Phase 2 is the body of the interview that focuses on data collection
 - **Phase 3: Data Analysis** – In Phase 3, after the information is collected, the interviewer reviews the information, compares it with other available information and then attempts to reconcile inconsistencies. During Phase 3 the interviewer also decides what verification and documentation steps are required.
 - **Phase 4: Closing the Interview** – During this phase the interviewer provides clear instructions regarding additional actions the family must take and answers questions the person interviewed may have.

PART III GUIDELINES FOR INTERVIEWING

How Interviews Are Structured

- Owners generally use one of two methods to conduct formal interviews. The key difference is whether the family completes the required forms in advance of the interview or the interviewer completes the forms during the interview.

Family Completes Forms in Advance

- The owner gives or mails the required forms to the applicant or tenant with instructions for their completion. The family brings the forms to the interview and the interviewer and family representative review the information together.
- This common method has two key advantages: 1) it saves interview time because forms have already been completed and, 2) the information provided is in the applicant's/tenant's own handwriting.
- But there may be several disadvantages, especially if the interviewer is not well trained or the application form is not well designed. These disadvantages include:
 - The interview may be less thorough in discussing primary questions because the form is already completed.
 - Depending on how well the questions are structured and how clearly they are worded, the applicant may not really understand the intent of the questions to which they are responding.
 - The interviewer does not have the opportunity to observe the individual's response to the questions.

Interviewer Completes Forms

- The interviewer begins with a blank application or recertification form. The interviewer asks all of the questions and records the answers. This method has several advantages:
 - It requires a true interview because each question must be asked by the interviewer.
 - The interviewer has the opportunity to explain what information is needed before the person responds.
 - The interviewer is better able to determine if the applicant understands what is being asked.
 - The interviewer is able to observe body language and other non verbal behaviors for their timing and consistency with the questions being asked.
- The two primary disadvantages of this method are 1) It is more time consuming and, 2) the information has not been completed in the applicant's or tenant's own handwriting.
 - Little can be done to address the first disadvantage. However, the owner should balance the additional time required on the interview "up-front" with the possible time saved dealing with problems and issues that arise later as a result of inadequate interviewing.
 - To compensate for the second disadvantage, owners who use this method sometimes require the applicant or tenant to complete a Personal Declaration Form that captures most of the information on the application form. The Personal Declaration Form is given or mailed to the applicant prior to the interview.

The Initial Eligibility Interview

- The initial eligibility interview may be the most critical interview in the housing process because it addresses the family's eligibility as well as income and rent determinations.
- At the initial interview, interviewers have the opportunity to establish a professional, service-directed relationship with prospective tenants. The attitude and behavior of the interviewer can either encourage or discourage cooperation and compliance. An interviewer who is prepared, professional, alert and service-directed is more likely to obtain cooperation and prevent omissions and misrepresentations than one who is unprepared, inattentive or indifferent.

Annual Recertification Interviews

- Owners are required to complete an annual recertification for each tenant family. Though equally important, there are key differences between the annual recertification interview and the initial one. At the initial interview owners gather more data than at annuals (for example, all of the questions pertaining to screening and suitability would not be relevant at the annual). Owners have the advantage at an annual of having background information about the family from the previous year's certification. Even so, a thorough interview is needed at annual recertification. Owners should not assume that family circumstances or even family composition is the same as the preceding year. Owners should compare the new information provided by the family to information in the file. Owners should look for changes in family composition, income sources and amounts as well as dates of birth and social security numbers for all family members. A discrepancy may suggest additional questions that should be asked.

Preparing for the interview

- Using an interview plan is an effective way to ensure consistent results. An interview plan includes:
 - A pre-determined and practiced sequence of events so that all interviews follow the same steps (see IV Conducting the Interview below)
 - A checklist the interviewer uses to ensure that the same information is provided to all applicants and tenants
 - Advance review of any known information about the applicant (for scheduled interviews). A discrepancy between known information and new information may suggest additional questions that should be asked.
 - The use of appropriate verification and consent forms available that cover a wide range of verification sources

PART IV CONDUCTING THE INTERVIEW

- In this section, the four Phases of the Interview are described in greater detail. This section also includes a discussion of post-interview resolution of discrepancies, common mistakes in interviewing, active and passive listening, pacing and body language. Although this section discusses the initial interview, the principles discussed apply equally to other types of interviews as well.

Phase I: Transition to the Interview

- The transition to the interview is defined as the period between when the meeting begins until the interviewer begins the body of the interview. The purpose of Phase 1 is to provide information to the applicant, not to ask questions about the applicant's circumstances. This may be the most critical part of the interview process because it sets the tone for the rest of the interview and may prevent misunderstandings later in the interview. It establishes the ground rules for the interview and explains the eligibility process so the applicant knows what to expect.
- If done properly, the transition phase will establish trust and confidence in the interviewer. The interviewer must demonstrate competence, trustworthiness, and interest in the applicant's situation. It is normal for people of all socioeconomic levels to be reluctant to disclose information about their family and personal finances to a stranger. This transition phase is intended to reduce apprehension and to create confidence in the interviewer's competence and sincerity. During this phase the interviewer should use a "Pre-Interview Checklist". Sample items for the checklist and examples of typical language for some of the items are provided below.

1. Greeting and warm-up

- A friendly, business-like greeting. Interviewer gives name and title/position, explains the purpose of the interview and approximately how long the interview will take.

2. Legal identification

- The interviewer requests an acceptable form of legal identification.

3. Provide an overview of the program and the tenant selection process

- Briefly explain the application process and any relevant screening procedures used by the owner. This lets the applicant know what is going to happen during the course of the interview. Typical language after explaining the screening process:
 - “Before beginning your actual interview Mr/s____, there are certain things that I am required to explain to you about the interview process. I am going to use this checklist to review them so that I don’t leave out anything that is important for you.”

4. Explain the types of information that applicants are required to provide as part of the application process

- Providing an up front overview of the specific types of information that all applicants are required to provide will better prepare the applicant to disclose with a minimum of resistance. It also communicates that the procedure is a standard one that applies to all applicants.
- Typical language:
 - “As a part of completing your application I will be asking you to answer questions and to provide information about your situation. These questions will pertain not only to you, but to all of your family members who will be living with you.

Many of these questions are personal and confidential in nature. For example, I will be asking you the SSNs of all family members and questions about various types of income (money) received by you and the other members of your family. I will be asking questions about assets such as property, bank accounts, investments and life insurance policies.

It is important for you to know that all applicants are required to provide the same types of information and answer the same types of questions.”

5. Explain how the information will be used and maintained

- Most people are reluctant to disclose information about income and family members to a total stranger. An explanation of how the information is used and safeguarded will usually minimize anxiety and encourage confidence in the professionalism of the interviewer.
- Typical language:
 - “It is important for you to understand that the any information or documents you provide will only be used for the purpose of determining your eligibility to lease a unit and to determine the amount of rent you will pay. The information will not be shared with anyone without your written consent. We will place your application in an individual file, and it will be kept in a locked and secure location.”

6. Explain the verification process

- This step puts applicants on notice that the owner will be contacting third party sources to verify the information they provide. It demonstrates that the owner is thorough and, if done properly, may discourage an applicant who is considering falsifying information.
- Typical language:
 - “When you complete your application, we are required to verify the information you have provided, and you will be required to sign authorization forms so that we are able to do that.
Here are some examples of how we verify information. If any family member works, we will mail a form directly to the employer. We will verify checking, savings accounts and any other kind of investment with the bank or other holder of investments. We will verify benefit income with all relevant agencies such as the Social Security Administration or the local welfare department. We may also request additional documents such as pay stubs or tax returns. We also will run a credit bureau inquiry.”

7. Explain the importance of complete and accurate information

- Typical language:
 - “Because of these verification requirements, I’m sure that you can see why it is so important that the information you provide today is complete and accurate. So as we go through the application, please let me know if you are not sure of something that I ask you. I’ll be happy to explain it.”

8. Explain the consequences of false or incomplete information

- It is important that applicants understand that there are consequences for false statements and intentional omissions. It is also important that this be explained in a non-threatening manner. Too little emphasis may cause the family to be unaware of the consequences. Too much emphasis may set a negative tone to the interview. Unless there is information to the contrary, the owner should take care not to sound accusatory.

- Typical language:

- "There is another important point that we are required to explain to all applicants; it has to do with the penalties for making false statements or providing false documents with your application. I'm sure that this does not apply to you, but on occasion, some applicants have not provided correct information.

When you sign the required forms you are certifying that you have given complete and accurate answers. There are both criminal and civil penalties for making false statements on a housing application. In addition to these penalties, if any applicant provides false or incomplete information, we would have no choice but to deny the application."

9. Ensure that everything has been understood

- Typical language:

- "So, before we begin the interview, do you have any questions of me? Is there anything that you are not sure of or have questions about?"

- It may be helpful to use some specific examples, such as:

- "Is there anything else you need to know about how we are going to handle the interview, how we will verify or use the information you provide?"

Phase 2: Information Gathering

- After completing the transition to the interview (Phase 1), the information gathering phase begins. This is the body of the interview where all of the applicant's circumstances are explored.
- Having a comprehensive application form is important because the application form guides the questioning. Sample primary and secondary discussions will be discussed later in this document.
- During this phase the interviewer should review with the applicant all questions on the application form to ensure that the applicant understands them. The interviewer must ask appropriate secondary questions to clarify information as needed. Tips on asking good questions is provided in Part V of this document.
- When an applicant has completed the application in advance, make sure that all questions have been answered. Nothing should be left blank.
 - Confirm all information provided on the application form and make appropriate file notations as needed.
 - If 'N/A' has been entered as a response, ask the applicant to enter a yes/no or other response as needed. When questions are not answered specifically misrepresentations are more difficult to prove later on.
 - Don't assume anything. For example, an applicant without children in the household could still be receiving back child-support payments.
 - Avoid negative body language, facial expressions or other expressions of disbelief. Do not challenge or confront any information being provided during this phase of the interview.
- Take care of any technical requirements including obtaining required signatures and ensuring that all forms are dated. Collect any needed forms that the applicant brings to the interview.

Phase 3: Information analysis

- When the information gathering phase of the interview is over the interviewer should take the time, before the applicant leaves, to evaluate the information and make certain decisions as follows:
 - What other information or documents are needed to complete the application? This includes both HUD-required information and documents (e.g. consent forms, documents that support information provided such as proof of age or SSN) and information required by owner policy.
 - What facts must be independently verified? A separate consent form must be used for any verification that goes beyond the scope of form HUD-9887.
 - What facts require further explanation? Interviewers have an obligation to request explanations of any facts or documents provided by an applicant that are questionable. Are there items that conflict, are inconsistent or non-credible?
 - Examples:
 - Where the interviewer has solicited information regarding expenses, current monthly expenses reported by the applicant exceed the amount of income reported.
 - The family reports zero income. However, there is a significant discrepancy between information contained in a credit report and information reported by the applicant. This is the time to ask for reasonable explanations to resolve these issues. Interviewers do not have to be confrontational or act “tough” to ask the tough questions. Using intimidation usually results in psychological resistance, at a minimum, or anger and aggression at worst.
 - The use of certain phrases helps to stay focused on the issue at hand. Keep questions neutral in tone. Examples:
 - “Mr/s X, So far I’m clear on everything on your application, but I’m confused about something here, could you explain...”
 - “Mr/s X, there is a difference of \$X between your income and the regular expenditures you have reported. Can you explain that?”
 - “Mr/s X, help me to understand how...”

Phase 4: Closing the Interview

- The last phase of the interview involves bringing closure to what has been agreed upon and clarifying what will happen next.
 - Provide written instructions and deadlines if the applicant is required to provide additional documents and information, and keep a copy to file. Example: An applicant may have forgotten documentation of a SSN for a family member.
 - Provide additional information to applicant on any aspect of the process, if needed.
 - Provide the appropriate HUD fact sheet explaining how rent is calculated.
 - Advise the applicant that a final decision of eligibility will be made after verifications have been completed.

Resolving Discrepancies after the Interview is Over

- In some cases there may be differences between information provided by the family and information received from a third-party source. An important role of the owner is to research these differences objectively, to resolve the discrepancy and to document the process and the basis for the owner's decision. Owners should adopt standard procedures for resolving discrepancies.
- Some important points here are:
 - Do not automatically assume that the family provided false information. Circumstances could have changed between the date of the family's statement and the date the conflicting information was received by the owner. In the case of third-party verification, a mistake could have been made by the third party in completing the verification form.
 - Be prepared to discuss the discrepancy with the third party information provider and with the family directly. This may involve telephone calls to both. The purpose here is to obtain current and accurate information. Good interviewing skills will help clarify the situation.
 - It may be necessary to obtain additional documents. Sometimes the family may be able to provide other documents that help to resolve the issue such as a tax return or court order.
 - Document the basis for the decision. Make sure there is a written account of all relevant dates, conversations and individuals who provided the information upon which the decision was based.

Common Mistakes in Interviewing

- Typical mistakes made in the interviewing process include:
 - Not allowing enough time to interview properly
 - Failing to establish rapport and ground rules before starting the “paperwork” that requires the interviewer to ask personal questions
 - Communicating distrust; making snap judgments about people based upon superficial observations
 - Failing to listen for what may be behind a response
 - Failing to control the interview process, not control the person
 - Focusing on the paperwork and not the person -- lack of eye contact
 - Giving personal opinions about the family’s circumstances
 - Trying to be tricky; there is no need to try to trap or trick a person into a false statement. If the interviewer is asking the right questions in a professional way, conflicting statements will be apparent.
 - Communicating disapproval of a persons situation or lifestyle
 - Failure to make appropriate file notations about information that may be material to the application

Active and Passive Listening

- Good listening skills and techniques are essential for effective interviewing. Pre-formed opinions often prevent interviewers from getting all of the information they need. Interviewers should remain non-judgmental and acknowledge the information provided in such a way as to encourage the person interviewed to continue.

Passive Listening

- Passive listening encourages the person to communicate and is seen as evidence of concern and interest. It is an effective tool for getting people to talk about themselves. Passive listening can be shown by:
 - Eye expressions
 - Facial expressions
 - Nodding
 - Leaning forward
- Passive listening can also be shown by acknowledgment responses:
 - “M-hmm”
 - “I understand”
 - “Really”
 - “That’s interesting”
- Passive listening shows only the listener’s “intent” to understand; active listening gives proof that the listener has, in fact, understood.

Active Listening

- Active listening provides frequent and continuous feedback to the person being interviewed so that the person can validate or correct the message.
- Examples:
 - “So what you are saying is...”
 - “Let me see if I understand that..., what you mean is...”

Pacing

- Poor communicators emphasize differences; effective communicators find the common ground with the other party. Pacing involves the subtle mirroring of characteristics of the speaker such as posture, movements and rate of speech.
- Skilled interviewers use pacing to establish common ground and to improve communication. Pacing helps establish rapport by creating a shared experience that reduces the differences between the parties.
- Examples of pacing are:
 - Match your rate of speech to theirs (unless inappropriate)
 - Adjust your volume to match theirs (unless inappropriate)
 - Notice and use some of the same words and phrases as the person
 - Approximate the speaker's gestures, without being obvious or mimicking
 - Approximate the speaker's general posture
- **Caution:** If pacing becomes obvious to the person being interviewed it may be perceived as condescending or “making fun.” Pacing should not be used in a way that erodes the integrity of the interviewer. For example, if the applicant refers to the TANF payments the family receives as “aid” it might be appropriate to mirror that term. However, using uncharacteristic poor grammar would be mimicking, not pacing.

Body Language in Interviewing

- An important aspect of professional interviewing is congruence between what the interviewer's words are "saying" and what the interviewer's expressions and body language are "saying."
- The use of body language during the course of an interview can either encourage or discourage cooperation and compliance.
- Experts say that in face-to-face communication:
 - 55% of the communication is based upon what we see (non-verbals such as facial expressions, gestures, body posture)
 - 38% is based upon the sound (tone of voice and inflections)
 - 7% is based upon the meaning of the words
- The tendency to read and respond to body language is almost universal. Applicants and tenants are evaluating the interviewer's level of interest, sincerity and competence throughout the interview. They are aware of the interviewer's facial and eye expressions, voice tone, and changes in body posture in relation to the interview conversation.

PART V QUESTIONS AS INTERVIEW TOOLS

- The ability to ask the right questions at the right time is essential to interviewing effectively. The way that a question is framed and worded directly affects the quality of information obtained.
- This section discusses typical question types and how they are used. In addition, it offers several tips on asking questions related specifically to the topic of family income.

Focus on Current Circumstances

- Questions should be asked about current, not past circumstances. The objective is to anticipate the circumstances (income, expenses, etc.) for the next certification period based upon current circumstances. As an illustration of this point:
 - **A poor question:** "Are the same family members living with you that were living with you last year?"
 - **A better question:** "What are the names of the people living with you now?"

Open questions

- Open questions are used to obtain explanations and to encourage discussion. They are worded so as to prevent "yes" or "no" answers. During information gathering, the interviewer should ask primarily open questions to stimulate conversation.
- Some of the best open questions are subtle commands:
 - "Please tell me about..."
 - "Can you describe how you...?"
 - "Could you explain...?"

Closed Questions

- Closed questions are designed to obtain a specific fact or a “yes” or “no” answer. They are used in information gathering, to close a topic or issue, or when specific facts are needed. Although closed questions are an appropriate way to collect many of the required facts, untrained interviewers often over-use closed questions. This limits the information they obtain. Examples of closed questions include:
 - “Where do you work?”
 - “Do you have any other investments?”
 - “What is your savings account number?”

Probing Questions

- Probing questions are asked when additional information is needed or for clarification.
- There are several types of probing questions.
 - **Clarifying** – An attempt to determine the meaning of a response
 - “Could you explain what you mean by ...?”
 - **Expanding** – Seeking new information to build on a previous statement.
 - Family Statement: “I’m looking for a job right now.”
 - Your Question: “What type of job are you looking for?”
 - **Resolving Inconsistencies** – Reflecting to the client that what the client has just said is inconsistent with a previous statement or other information obtained by the interviewer.
 - Family Statement: “I have not had any income for the past year.”
 - Your Question: “Excuse me, but I’m confused. Your credit report shows your car payment of \$300 is paid current. Can you explain how you have been able to do that?”

Questions to Avoid

- **Leading** – Questions that bias the answer or suggest a desired answer. Leading questions may discourage applicants from offering information that they otherwise might have disclosed. They send the message that an obvious answer is the one that will make the interviewer happy.
 - “You don’t have any income, do you?”
 - “Everything is the same as last year, right?”
- **Double-Negative** – Questions/statements containing double-negatives are confusing or suggest an answer opposite to the correct one. People will not always state when they are confused. Double-negative questions may result in an applicant answering the question correctly and the interviewer interpreting a different answer.
 - “Didn’t you understand that you shouldn’t have done that?”
- **Complex/Multiple** – Questions that confuse people by requiring more than one answer. Also, these questions may give dishonest people the opportunity to answer only one part of the question.
 - “Do you have a checking or savings account and what other income do you receive?”
- **Jargon** – HUD terms and jargon that are familiar to owners and managers may be confusing and intimidating to applicants or other non-housing persons, such as third-party sources. Even common terms such as medical expenses, income and assets have specific meaning under HUD regulations.
 - “Do you anticipate allowable medical expenses during the initial certification period?”

Question Sequencing

- The housing interview focuses on specific areas such as income, assets, expenses and others. Interviewers should use question sequencing to cover all of the possibilities within a specific interview area.
- Untrained interviewers will often overuse “yes, no” questions when asking about areas that have multiple possibilities and require several questions that are progressive.

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- Here is an example of ineffective questioning about the area of bank accounts.
 - Your Question: “Ms. X, do you have a checking or savings account?”
 - Family Answer: “Yes”
 - Your Question: “May I have the account number?”
 - Family Answer: “Yes”
 - Your Question: “What is the balance?”
 - Family Answer: “Around \$750.00”
- At this point, the interviewer moves on to another area of questioning.
 - Here is a more effective approach for the area of bank accounts:
 - Your Question: “Ms. X, where do you bank?”
 - Family Answer: “At the ABC Bank.”
 - Your Question: “What type of accounts do you have there?”
 - Family Answer: “Well, I have a checking account.”
 - Your Question: “May I have the account number?”
 - Family Answer: “Yes”
 - Your Question: “What is the balance in that account?”
 - Family Answer: “Well, I think it’s about \$750.00.”
 - Your Question: “Thank you. What other type of accounts do you have at the ABC Bank?”
 - Family Answer: “None.”
 - Your Question: “Are there any other banks that you do business with?”
 - Family Answer: “No”
 - Your Question: “Do you belong to a credit union?”
 - Family Answer: “Yes, I belong to the XYZ credit union.”
 - Your Question: “What type of accounts do you have there?”
 - Family Answer: “Well, I have a checking account, a regular savings account, and a Christmas Club account.”
- At this point, the interviewer proceeds to pursue information on each account.
 - Your Question: “In addition to the XYZ credit union and the ABC Bank, are there any other financial institutions where you have any type of account or investment?”
- The point in this example is that the interviewer’s job is to eliminate all possibilities in each area of questioning before moving on to the next area.

Asking Questions about Income

- Typically, the relevant questions pertaining to eligibility, income, and assets, are printed on the application form. The application form then drives the interview dialogue between applicant and interviewer. The problem is that all application forms are not created equal. Some have more questions than others. Some have better questions than others. HUD rules change. Owners should review the forms staff use to interview applicants and tenants periodically for completeness.
- The questions below are examples of questions that might be asked if they were not a part of the application form. Some of these questions may be printed on the owner's application form and would then be consistently covered in every interview.
 - "Did you or any family member file a federal or State income tax return last year? If yes, who?"
 - "Do you or any member of your family receive any of the following types of income? (List all income types from HUD regulations). If yes, who? How much? How often? From what source?"
 - "What money do you receive from any and all sources to pay your bills and living expenses?"
 - "Does anyone outside of your household pay for any of your bills or regular expenses? If yes, who? How much? How often?"
 - "Does anyone outside of your household give you money? If yes, who? How often? How much?"
 - "Does anyone outside of your household contribute regularly? If yes, who? How often? How much?"
 - "Who pays your bills for electricity, telephone, and other utilities?"

PART VI INTERVIEWING PERSONS WITH DISABILITIES

General Requirements

- Owner of HUD-subsidized multifamily properties are subject to several important federal civil rights laws with respect to both eligibility for admission to housing and conditions of occupancy of the housing.
 - Adherence to these federal requirements will impact the owner's interview processes and protocols, as they are applied to persons with disabilities.
- The Fair Housing Act requires housing providers to provide “reasonable accommodations” to persons with disabilities.
- Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based upon disability in all programs or activities operated by recipients of federal financial assistance, and imposes affirmative obligations on owners to make their programs, as a whole, accessible to persons with disabilities.
- Some properties may be lawfully restricted to persons with disabilities in general, or to persons that fall within a specific category of disability.
- Some properties may have specific units designed with accessible features, intended for occupancy by individuals whose disability requires the accessibility features of a particular unit.
 - In addition, some properties may give a selection priority or “preference” available to persons with disabilities or to persons with a particular category of disability.
- An owner may need to establish and verify disability to determine whether a family or person meets the definition of disability used to determine eligibility for a project, preferences, or an allowance, or to identify applicant needs for features of accessible units or reasonable accommodations.

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- Owners may be uncertain how to initiate interviews and interview questions pertaining to an individual's disability. When establishing an applicant or tenant's disability through the interview process, owners need to be aware of and adhere to certain restrictions.
 - An owner *may not*:
 - Inquire whether an applicant for a dwelling, a person intending to reside in a dwelling after it becomes available, or anyone associated with an applicant or resident, has a disability
 - Inquire as to the nature or severity of a disability of an applicant, a person intending to reside in a dwelling after it becomes available, or anyone associated with an applicant or resident
 - Inquire to determine whether an applicant may live "independently"
 - An owner *may* make certain inquiries, provided they are made of all individuals (whether or not they are persons with disabilities):
 - Inquire into an applicant ability to meet the requirements of tenancy
 - Inquire to determine if an applicant is a current illegal abuser or addict of a controlled substance
 - Inquire whether an applicant qualifies for housing that is available only to persons with disabilities, or to members of the category of persons with the disability service by the project
 - Inquire whether an applicant qualifies for a priority available to persons with disabilities or to persons with a particular category of disability
 - An owner may make inquiries as to whether an individual has a need for the accessibility design features of a specific unit.
 - Where an individual has requested a reasonable accommodation (see later discussion), an owner may inquire as to the disability-related need for the requested accommodation or modification.

Reasonable Accommodation

- Owners are obligated to operate their properties in a non discriminatory manner and to make them physically accessible. In addition, they must consider other requests for reasonable accommodations from applicants and tenants with disabilities.
- A reasonable accommodation is an adjustment, exception or change to a program, policy, service, dwelling unit or building that will allow a person with a disability to participate fully in the program, live in the dwelling unit or take advantage of a service.
- When contacting applicants for an interview, it is recommended that all applicants be asked whether they will need any accommodations during the interview process. If appointments are scheduled by mail, this should be included in the letter. The application form should also contain questions as to whether accommodations to the unit are needed or whether accommodations are needed for the applicant to more fully utilize the owner's housing services.
- In terms of interviewing, owners should be aware that there may be circumstances when an adjustment to the owner's policies or procedures is needed. For example:
 - Owners that normally require that applications be made in person, may need to permit a person with a disability to apply by mail.
 - To avoid overcrowding in a small rental office, an owner generally may request that only one member of the family come to a recertification interview. In the case of a person who is hearing impaired, the owner might need to permit a second person to come as an interpreter.
 - Service animals must be permitted, even if a "no pets" complex.

Asking Questions of Persons with Disabilities

- *If the interviewee is deaf or hard of hearing:*
 - Ask the person to choose a place to sit where he or she will be comfortable.
 - Speak directly to the person. If he or she reads lips, speak slowly and carefully and be sure to keep your hands away from your mouth.
 - Do not shout.
 - If the person uses a sign language interpreter address questions and answers to the person, not the interpreter.

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- ***If the interviewee is blind or has a vision disability:***
 - Always identify yourself and anyone who may be with you.
 - The applicant cannot read body language, so let the person know when you need to move locations or end the conversation. Avoid using hand or body gestures as a way of explaining a concept.
 - Allow service animals to accompany the interviewee. Do not pet or otherwise distract a service animal.

- ***If the interviewee has speech-related disabilities:***
 - Phrase questions so that they can be answered with short responses.
 - Give your total attention to the person. Don't be afraid to ask for clarification if needed.
 - Do not complete the person's thoughts for them. Be patient and wait for the entire response.

- ***If the interviewee uses a wheelchair, cane or crutches:***
 - Double check to be sure that the interview site is accessible.
 - Remember that a wheelchair is considered to be part of a person's body space; don't lean against it.
 - Find a location where you can sit down and be at eye level with each other.
 - Allow persons using canes or crutches to keep them within easy reach.

PART VII QUESTIONS ON THE INITIAL APPLICATION/RECERTIFICATION FORMS

Introduction

- The application and recertification forms are the “paper trail” of representations made by the applicant or tenant. They are the proof that all questions pertaining to eligibility or level of assistance were asked and they ensure that all persons are asked the same questions.
- To assist applicants and tenants in reporting family information the application form should list all of the items categorically.
- In this section are examples of questions that might be included on the printed application form. These examples do not constitute an application form, but are intended to demonstrate the types of question that should be on the form and how these questions might be grouped by topic.

Primary and Secondary Questions

- Questions on the application form should be structured in terms of both primary and secondary questions.
- **Primary** questions should be *direct* questions, requiring an affirmative declaration or denial (a “Yes” or a “No”). **Secondary** questions are *follow-up* questions to the primary question, expanding upon and clarifying the response to the primary question. Here is an example.

Primary question

- Do you or any family member have a savings account?

Secondary questions

- Which family member(s)?
- What is the account number(s)?
- What is the current balance in the account(s)?
- Following is a listing of sample primary questions for a variety of income and rent circumstances. All questions are “Yes/No” questions. For each question, secondary questions would need to be developed to gather additional information.

Income Primary Questions

- Do you or any family member:
 - Own a business?
 - Work full time?
 - Work part-time?
 - Receive wages, tips, bonuses or commissions for any type of work?
 - Work for someone who pays in cash?
 - Receive unemployment compensation benefits?
 - Receive worker's compensation?
 - Receive severance pay?
 - Receive child support through a child support recovery unit or other agency?
 - Receive child support from an absent parent?
 - Receive alimony payments?
 - Receive public assistance under TANF?
 - Receive Social Security payments?
 - Receive SSI payments?
 - Receive payments from a pension?
 - Receive payments from an annuity?
 - Receive payments from an insurance policy?
 - Receive regular contributions from persons or organizations outside of the home?
 - Receive military pay or allotment?
 - Receive any other type of payments not mentioned here?
- Are you or any family member self employed?
- Does anyone outside of your family pay for any of your bills or expenses?
- Does anyone outside of your family give money to you or any family member?
- Did any family member file a Federal Income Tax return last year? (See **Part IX, Policy Issues Affecting Data Collection and Program Integrity**, below)

Asset Primary Questions

- Do you or any family member own or have interest in any property/real estate?
- Have you or any family member sold or given away any property or other asset within the past two years?
- Do you or any family member:
 - Own stocks?
 - Own bonds?
 - Own savings certificates?
 - Own trust funds?
 - Have any individual retirement accounts (IRAs, Keogh)?
 - Have any inheritances, lottery winnings or lump sum payments?
 - Have life insurance policies?
- Do you or any family member receive income from any type of asset such as:
 - Interest on a checking or savings account?
 - Rental property income?
 - Dividends from an investment?

Expense Primary Questions

- Do you or any family member:
 - Pay child care expenses for a child aged 12 or younger?
 - Pay for a care attendant so that a family member can work?
 - Pay for equipment for any family member with disabilities so that a family member can work?

Primary Questions for Elderly or Disabled Families Only

- Do you or any family member:
 - Pay Medicare?
 - Pay for any kind of medical insurance?
 - Pay for outstanding medical bills?
 - Anticipate out-of-pocket medical expenses during the next 12 months?

Screening Primary Questions

- Have you or any family member:
 - Been evicted from any type of housing?
 - Paid fees for late payment of rent?
 - Moved in violation of a lease with an owner?
- Do you or any family member:
 - Owe money to a landlord for damages or non-payment of rent?
 - Owe money to a Public Housing Authority or Management Company?

Program Integrity Primary Questions

- Have you or any family member:
 - Used a name other than the one you are using now?
 - Used a social security number other than the one you are using now?
 - Been arrested for any type of violent or drug-related criminal activity?
 - Been convicted for manufacturing methamphetamines on the premises of a federally assisted unit?

Additional Primary questions

- Are any family members subject to lifetime registration as a sex offender?
- Are you or any member of your family currently using any illegal or controlled substance?
- Are any family members temporarily absent from the home?

PART VIII ZERO-INCOME FAMILIES

Interviewing Zero-income Families

- Some families may report zero income because they do not fully understand the HUD definition of income. A question like “What is your income?” is ineffective for this reason. When the term *zero income* is used, it is important to distinguish between several different situations:
 - Families with certain sources of income may have zero annual income because of HUD’s income exclusions.
 - Some families may have zero adjusted income because of deductions from income.
 - Other families may have zero income at given time because of a recent adverse situation (e.g., being laid off or a person leaving the household).
 - Some families report zero income for extended periods of time.
- Different approaches are needed depending on why and how long the family has reported zero income.
- Of particular concern are families that report zero income over an extended period, especially when there appears to be evidence to the contrary. Interviewers sometimes feel powerless because they have no factual basis to refute the claim of zero income, and they need facts.
- For example, a family reports zero income, but:
 - The family has active utility/telephone service in place or some other regular financial commitment.
 - A credit report shows that loans and other accounts have been established and are paid current.
 - The individual’s life-style is incompatible with having no income.
- One technique to employ is to incorporate a “current expense analysis” into the application process. This involves adding a section to the application and recertification forms that captures the family’s current expenses, determining the payment status of each of the expenses and comparing this amount to the amount of income reported.

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- Here is an example of what this analysis might look like on an application form. Note: Only four items are listed here, but other types of expenses would be included in an actual analysis.

Expense Item	Amount	Paid Current?		Amount Paid?
		Yes	No	
Rent	\$			\$
Auto	\$			\$
Electric	\$			\$
Telephone	\$			\$

- With this information an interviewer could ask more thoughtful and fact-based questions about the income source(s) the family uses to pay the ongoing expenses.
- It is important to understand the difference between amounts due and actual amounts paid. For example, a person could report that the car payment is \$250, but at the time they report it they are two months behind on the car payment. In this case the \$250 would not be included as an expense in the comparison of income and expenses because they aren't actually paying it.
- However, a word of caution! The information discussed above is for the purpose of comparing reported income with actual expenditures. ***Under no circumstances could an owner count a reported expenditure item as income for purposes of anticipating annual income.***
- Practices and procedures for dealing with zero income families should be addressed in the owner's operating policies.
- Additional techniques include:
 - Have the family complete a survival statement certification at regular intervals.
 - Verify beyond what the family discloses: Verify if any family members are receiving TANF or unemployment benefits, for example.
 - Obtain a credit bureau report to determine if there are indicators of current financial activity.
 - Capture the status of all current expenses on the application and recertification form. If any expenses are paid current, this conflicts with the claim of zero income. These representations may also conflict with information on credit report inquiries.

PART IX POLICY ISSUES AFFECTING DATA COLLECTION AND PROGRAM INTEGRITY

- There are two areas in which local policy should be discussed: one area directly relates to eligibility interviews and the other addresses how owners will follow up on indicators of misrepresentation and fraud.

Local Qualifications for Admission

- In order to obtain the most complete information and to detect unreported income, it is often necessary to obtain documents that are not traditionally submitted with applications for housing. The requirement to provide these documents should be addressed in the tenant selection plan.
- Federal law limits the information owners can collect about an applicant or tenant to only information that is necessary to determine eligibility and level of assistance.
 - Federal privacy requirements establish the responsibility of owners and their employees to use information provided by applicants and tenants only for specified program purposes and to prevent the use or disclosure of this information for other purposes.
 - Owners must also comply with state privacy laws concerning the information they receive from third-party sources about applicants and tenants. These laws generally require confidentiality and restrict the uses of this information.
- Here are some examples of documents that could be required (when relevant to the applicant) at the time of the initial determination of eligibility.
- ***Divorce Decrees, or other court orders involving settlements or payments***
 - Divorce decrees contain information that may be highly relevant to the application (family composition, income and assets) such as custody of minors, court-ordered child support or alimony payments, or information about property settlement. In certain cases the requirement to provide a divorce decree could discourage misreporting with regard to any of the information provided in the court order.

- ***Income Tax Returns***

- If an applicant discloses his or her income truthfully as most do, a copy of the income tax return will corroborate statements made by the applicant.
- Many fraud cases involve the misreporting of earned income. When previously unreported earned income is discovered, it is important that owners are able to show through file documentation that the income was unreported intentionally.
- Although not required by HUD, it is recommended that the applicant be required to provide a copy of the tax returns of any family member that submitted a return.
- If an applicant or tenant chooses to misreport earned income, they will also probably deny that they filed an income tax return for the previous year. If the unreported earnings are discovered at a later date, as is often the case, this denial strengthens the case. The more false statements on the application, the easier it is to establish that fraud occurred.

Policies for Indicators of Fraud

- Fraud is defined as the intentional, false representations or concealment of a material fact for the purpose of inducing another to act on it to his or her injury.
- In accordance with recent HUD Office of Inspector General guidelines, it is advised that agencies develop a fraud policy. A fraud policy specifies what an organization does to reduce fraud, how fraud matters are handled, and what action is taken as a result of an investigation.
- Suggested topics to be addressed in a fraud policy include:
 - **Policy Statement:** The policy should provide that management is responsible for preventing, detecting and reporting fraud, and require each member of the management team to be familiar with the types of signals suggesting possible fraud within his or her scope of responsibilities.
 - The policy should state who is responsible to investigate suspected fraud.
 - **Scope of Policy:** The policy should state what constitutes fraudulent activities and that the policy extends to management and employees.
 - The policy should state that where fraud or related criminal activity is suspected, it should be reported the HUD OIG Hotline or the Special Agent-in-Charge of the Region that has jurisdiction.
 - The policy should state that the person in charge of the agency's internal investigation has the authority to take control and examine records.

PART X SUMMARY

- Technical knowledge of the HUD rules and policies alone is not enough. Without effective interviews, owners will not be able to collect the information to which the HUD rules and policies must be applied. For the interview process to be effective, owners must have staff with the right skills, using the right tools with the right attitude.
- ***The right skills:*** Having staff who excel at interviewing doesn't happen by accident. Training staff on interviewing techniques is as important as training on regulatory requirements.
- ***The right tools:*** Skilled interviewers need effective forms for collecting information (applications and recertification documents) and verification forms that ask the right questions. They also need documents that help explain program requirements and owner policies to applicants and tenants.
- ***The right attitude:*** Interviewing is not something that is done to people; it is a process that requires interaction with people. The attitude of the interviewer directly relates to a successful result. All good interviewers have the right skills, but the best interviewers employ those skills with a high level of interest, sincerity and professionalism.