

# PHA Name : Fort Mill

**PHA Code :** SC036

**MTW Supplement for PHA Fiscal Year Beginning :** (MM/DD/YYYY): 7/1/2023

**PHA Program Type:** Combined

**MTW Cohort Number:** MTW Flexibility for Smaller PHAs

**MTW Supplement Submission Type:** Annual Submission

## **B. MTW Supplement Narrative.**

The housing needs and strategies will change based on the current market at this time, or perhaps since the change has occurred over the last three to four years. The affordability of available units has increased well above the payment standards. Our incentives for landlords will hopefully bring more landlords into the program. An increase in the payment standards or changing them to all be more average for our small area will also increase utilization.

The biggest change in eligibility this year will be the working preference. Ports from other agencies must be either elderly/disabled or have guaranteed employment prior to moving here. The preference for the Housing Authority of Fort Mill has been elderly/disabled or working 30 hours or more as the top preference for quite some time. This will now be mandatory for incoming applicants.

The financial resources are still the same at this point, however there will be a landlord incentive that will be paid at this moment from administrative funds. If this becomes a problem, then a new resource will be sought.

Once the MTW is in place the rent will be determined still by 30% of income, however the minimum rent will be increased which may cause an increase for a limited number of current clients. Over time, the rent will change based on the plan. Also, the self-certification of assets could also change rental amounts.

A substantial deviation may or may not be a real change for the Housing Authority of Fort Mill's MTW plan. The Housing Authority has always chosen very low-income families for the Section 8 program. This will continue. The biggest change for this is that all families must be classed as elderly / disabled or working 30 hours or more per week. For current clients, the work element will be phased in. For new admissions and ports, it will happen in year one. The Housing Authority will seek units in a more active way to help clients.

The Significant Amendment has been presented with the changes that will occur in the first year.

**C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).**

<b>1. Tenant Rent Policies</b>	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Plan to Implement in the Submission Year
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Not Currently Implemented
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Not Currently Implemented
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
a. Increase PBV Program Cap (HCV)	Not Currently Implemented
b. Increase PBV Project Cap (HCV)	Not Currently Implemented
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>11. MTW Self-Sufficiency Program</b>	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Plan to Implement in the Submission Year
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

**C. MTW Activities Plan that Fort Mill Plans to Implement in the Submission Year or Is Currently Implementing**

<b>1.f. - Minimum Rent (HCV)</b>
<p><b>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</b></p> <p>The minimum rent will be set at \$75.00 for all households in the first year, with an increase and notice to residents to \$100.00 in the second year. Along with the total changes this will make rental amounts easier to understand for clients as well as allowing for hardship exceptions if necessary. An increase in minimum rent may encourage employment. These changes save clients time and in some cases, lower costs. Decreased paperwork allows more time to work with clients and to explore added benefits for the overall program for clients and the housing authority staff.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</b></p> <p>The Minimum Rent or Minimum Total Tenant Payment (TTP) = \$75.00 in year 1, \$100 in year 2 to increase cost effectiveness and encourage employment among the non-elderly/disabled HCV participants.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the hardship policy apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b></p> <p>1.f. - Minimum Rent (HCV); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)</p>
<p><b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b></p> <p>No</p>
<p><b>How many hardship requests have been received associated with this activity in the past year?</b></p> <p>No hardship were requested in the most recent fiscal year.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>Yes</p>
<p><b>What is the status of the Safe Harbor Waiver request?</b></p>

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

This is an approved HUD waiver, certain provisions of sections 3(a)(3)(A) and 8(o)(2)(a)-(c) of the Act and 24 CFR 5.6328 and 5.630

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**How much is the minimum rent or minimum Total Tenant Payment (TTP)?**

\$75

### 1.o. - Initial Rent Burden (HCV)

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Initial Rent Burden will be increased from 40% to 50%. This only applies to new clients, port ins or transfers so it will not affect the overall current client population. This will allow for clients to move in somewhere that may be somewhat above can be a comfortable rent and to help with the overall high rental rates and the requirements for a smaller voucher size holder into a larger unit.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Initial rent burden increased from 40% to 50% to allow higher success with leasing.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

This was previously approved under certain provisions of section 8(o)(3) of the 1937 act and 24 C.F.R. 982.508. The

Housing Authority is not exceeding 50%. This will allow the tenant a larger choice and no added expense to the Housing Authority.

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)**

1.f. - Minimum Rent (HCV); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 1.q. - Imputed Income (HCV); 1.s. - Elimination of Deduction(s) (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV); 12.b. - Work Requirement (HCV)

**If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?**

50.00%

**3.d. - Self-Certification of Assets (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

At the time of annual recertification, tenants will be allowed to complete a self-certification of assets if they declare that their total asset value is less than \$20,000.00. This will reduce the amount of documentation tenants will have to submit when they are completing their annual recertification. It will also decrease the administrative burden for HCV staff when income from assets cause very little impact to the HAP paid on behalf of tenants.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Neutral (no cost implications)

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Families will be allowed to complete a Self-Certification of Assets if they declare that the total asset value is less than \$20,000.00.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing**

**this MTW activity.**

This is a HUD approved waiver. Regulations waived certain provisions of section 8(o)(5) of the 1937 Act and 24 C.F.R. 982.516 (a)(3). At reexam the agency may allow the self certification of assets only up to \$50,000. The Housing Authority will verify if above \$20,000. This is cost savings for the Housing Authority as well as time and effort for the client.

**Please state the dollar threshold for the self-certification of assets.**

\$20,000.

**4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

To increase leasing options for HCV participants, the Housing Authority will begin paying a \$500.00 incentive for household leased with a voucher. Currently there are over 19 apartment complexes and a multitude of private owners and realty companies that refuse to accept tenants with voucher assistance. The Housing Authority will also pay a \$200.00 incentive for every landlord who refers a new landlord to the program who leases an HCV participant. by providing this incentive, the Housing Authority of Fort Mill hopes to increase landlord participation and to open new leasing opportunities to the voucher program participants.

**Which of the MTW statutory objectives does this MTW activity serve?**

Housing choice

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Increased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

To increase leasing options for our clients

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

This is HUD approved. The statute being waived is certain provisions of section 8(o)(9) of the 1937 act, and 24 C.F.R.

982.311 and 982.352(c). The safe harbor allows for payments to be made to landlords that may be equal to or less than 1



month of the contract rent. The payment will be made when the HAP contract is executed. Hopefully this will create a better housing choice availability even though it is a greater cost to the Housing Authority.

**Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)**

To all units

**What is the maximum payment that can be made to a landlord under this policy?**

500.00

**How many payments were issued under this policy in the most recently completed PHA fiscal year?**

0

**What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?**

\$0

#### **5.d. - Alternative Inspection Schedule (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Currently, regular inspections are being completed on an annual basis. The agency will begin conducting regular inspection on a biennial basis, unless requested otherwise by either the tenant or the landlord. Currently, the Housing Authority's HQS inspector conducts approximately 15-20 annual inspections each month. Changing the inspection schedule will reduce this number in half. For annual inspections, landlords will be allowed to self-certify that the repairs are made. The tenants must also sign the certification agreeing that all repairs have been made. If the tenant disagrees, a physical re-inspection will be scheduled. Units must still pass the initial inspection before a participant can lease the unit and physical re-inspections must be completed if a unit fails the initial inspection.

**Which of the MTW statutory objectives does this MTW activity serve?**

Cost effectiveness

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

Regular inspections will be conducted on a biennial basis, unless requested differently by the tenant or the landlord. Landlords will be able to self-certify repairs completed from these regular inspections if the tenant signs the certification form agreeing that the repair has been done. No changes will be made to the requirement surrounding initial inspections

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

This is a HUD approved waiver. Regulations being waived are certain provisions of 24 C.F.R. 983.103. This waiver allows for units to be inspected at least every three years as long as interims may be requested and all inspection requirements are met, as well as health and safety are adhered to. This would definitely be a cost saving for the Housing Authority by decreasing time spent on inspections, as well as all of the follow up of letters or emails. However if the landlord and the Housing Authority agree that an inspection should be done annually, it will be done.

**12.b. - Work Requirement (HCV)**

**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

The Housing Authority will begin phasing in a work requirement for all non-elderly/ non-disabled households. Beginning in year 2, each non-elderly/ non-disabled household will be required to have a least one adult member who is employed an average of 10 hours or more each week. This work requirement will increase over the next 4 years until the requirement is 30 hours or more each week for year 5 of the plan. To assist clients in securing and maintaining employment, the Housing Authority will partner with the Department of Social Services and local educational facilities to provide support. The Housing Authority will also provide homeownership classes and other classes to assist participants in self-sufficiency.

**Which of the MTW statutory objectives does this MTW activity serve?**

Self-sufficiency

**What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.**

Decreased expenditures

**Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?**

The MTW activity applies to all assisted households

**Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.**

For new admissions and current participants, a work requirement will be phased in for all non-elderly/non-disabled households, requiring one adult household member to be employed at least 10 hours a week or more, beginning in year two. This work requirement will increase to 30 hours per week per household by year 5. Effective immediately, all non-elderly/non-disabled households seeking to move into the Housing Authority's jurisdiction under portability must have an adult member who is employed 30 or more hours per week or their portability will be denied and the paperwork returned to the Initial PHA.

**Does this MTW activity require a hardship policy?**

Yes

This document is attached.

**Does the hardship policy apply to more than this MTW activity?**

Yes

**Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)**

1.f. - Minimum Rent (HCV); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 1.q. - Imputed Income (HCV); 1.s. - Elimination of Deduction(s) (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV)

**Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?**

No

**How many hardship requests have been received associated with this activity in the past year?**

No hardship were requested in the most recent fiscal year.

**Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?**

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

This is a HUD approved waiver. The waiver is under certain provisions of 24 C.F.R. 982.551. The first year notice will be given to our current clientele, however this will effect port in&apos;s that must be employed or elderly/disabled the first year. The Housing Authority will not exceed the threshold of working 30 hours per week per household as a requirement. This will definitely be a cost savings to the Housing Authority and provide incentive for clients to work.

**Does the MTW activity require an impact analysis?**

Yes

This document is attached.

**Does the impact analysis apply to more than this MTW activity?**

No

**Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?**

No

**What counts as "work" under this the work requirement MTW activity?**

employed gainfully 10 hours per week minimum the first year. Eventually it will be at least 30 hours per week employed.

**How will the MTW agency monitor compliance with the work requirement MTW activity?**

Changes in rent request, as well as review annually during recertification

**What supportive services are offered to support households to comply with the work requirement?**

contacts with agencies in the area.

**How does the agency address noncompliance with the work requirement policy?**

Formal notice in writing. This will be after the five year period. The 2nd year will be 10 hours at minimum wage that all employable household will be responsible for

**How many households are currently subject to the policy?**

0

**How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement?**

0

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No Agency-Specific Waivers are being requested.</p>
<b>E.2</b>	<p><b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b></p> <p><b>Does the MTW agency have any approved Agency-Specific Waivers?</b></p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

<b>Federal Fiscal Year (FFY)</b>	<b>Total Operating Subsidy Authorized Amount</b>	<b>How Much PHA Disbursed by the 9/30 Reporting Period</b>	<b>Remaining Not Yet Disbursed</b>	<b>Deadline</b>
----------------------------------	--	--	------------------------------------	-----------------

<b>G.</b>	<b>MTW Statutory Requirements.</b>	
<b>G.1</b>	<b>75% Very Low Income – Local, Non-Traditional.</b> HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
<b>Income Level</b>		<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income		0
49%-30% Area Median Income		4
Below 30% Area Median Income		6
Total Local, Non-Traditional Households		<b>10</b>

\*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

<b>G.2</b>	<b>Establishing Reasonable Rent Policy.</b>
<b>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</b> No	
<b>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</b> This will happen over time to include how what we are doing is working. Showing impact analysis for each portion so that the rent changes are justified, not only for the client but for the Housing Authority.	

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	1,680 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	# of unit months

**Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:**

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
------------------------	--------	------	------	------	------	-------	-------------	------------------	------------------------------	--	---	---	--

<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
------------	--

To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix" of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.

<b>Family Size:</b>	<b>Occupied Number of Local, Non-Traditional units by Household Size</b>
1 Person	50
2 Person	29
3 Person	29
4 Person	18
5 Person	7
6+ Person	3
<b>Totals</b>	<b>136</b>

<b>H.</b>	<b>Public Comment</b>
	Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.

<b>I.</b>	<b>Evaluations.</b>
	No known evaluations.

**Housing Authority of Fort Mill  
Minimum Rent (HCV) Impact Analysis**

<b>MTW Activities Covered by Impact Analysis</b>
<b>1.f on Supplement, Minimum Rent (HCV)</b>
<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
This activity will cause a nominal increase to possibly five families at the time of it's inception. The biggest increase based on current clientele would be \$6.00. However, ongoing this is a small increase to HA funds.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
The above statement is correct, that there would be a nominal increase to possibly five families.
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
no
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
none
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
none
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This will save small amounts of money for the HA providing cost effectiveness.
<b>7. Impact on the agency's ability to meet the MTW statutory requirements</b>
This will not be a problem.



**8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity**

Minimal if any. The Housing Authority of Fort Mill voucher program has never had a request for a hardship.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

**This will not any diverse effect on any particular protected classes.**

**Housing Authority of Fort Mill  
Work Requirement (HCV) Impact Analysis**

<b>MTW Activities Covered by Impact Analysis</b>
<b>12. b. Work Requirement (HCV)</b>
<b>1. Impact on the agency's finances (e.g., how much will the activity cost, any change in the agency's per family contribution)</b>
This activity will affect the family's contribution over time for the current clientele. It will affect this year's port-ins and new admissions. All port-ins except elderly / disabled will be required to work 30 hours a week.
<b>2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)</b>
For the current clientele, this year it will not affect them at all. This will happen on the following year. Port-ins or new admissions will not come on the program with no earned income unless elderly/disabled. They will pay 30% of income less deductions.
<b>3. Impact on the agency's waitlist(s) (e.g., any change in the amount of time families are on the waitlist)</b>
This could affect the waitlist time if clients are not employed. However, the Housing Authority of Fort Mill's highest preference has been working 30 hours or more per week and elderly/disabled for some time.
<b>4. Impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency)</b>
This will not affect families the first year at all.
<b>5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program</b>
none
<b>6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice</b>
This will meet the self-sufficiency goal.

**7. Impact on the agency's ability to meet the MTW statutory requirements**

This goal will allow tenants to become more self-sufficient, as well as prove to be more cost effective for the Housing Authority overall.

**8. Impact on the rate of hardship requests and the number granted and denied because of this activity**

There is no way to rate this currently. There has been no hardship request.

**9. Across the other factors above, the impact on protected classes (and any associated disparate impact)**

**This will not impact protected classes.**

**MTW CERTIFICATIONS OF COMPLIANCE****U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:  
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (DD/MM/YYYY), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of Fort Mill  
**MTW PHA NAME**

SC 036  
**MTW PHA NUMBER/HA CODE**

*I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).*

Connie C. Howard  
**NAME OF AUTHORIZED OFFICIAL**

Executive Director  
**TITLE**

Connie C. Howard  
**SIGNATURE**

5/2/2023  
**DATE**

*\* Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*



**U. S. Department of Housing and Urban Development**

South Carolina State Office  
Strom Thurmond Federal Building  
1835 Assembly Street  
Columbia, South Carolina 29201-2480

July 27, 2023

Ms. Connie Howard  
Executive Director  
Fort Mill Housing Authority  
Post Office Box 220  
Fort Mill, SC 29716

**SUBJECT: Moving to Work Supplement**

Dear Ms. Howard:

This letter is to inform you that the Moving to Work (MTW) Supplement for the Fiscal Year beginning July 1, 2023, is approved.

The Department's approval of this MTW Supplement is limited to approval of policies and actions authorized by the 1937 Act and flexibilities waiving provisions of the 1937 Act as outlined by the MTW Operations Notice. In providing assistance to families under programs covered by this MTW Supplement, your PHA must comply with the rules, standards, and policies established in the MTW Supplement as well as all applicable federal requirements other than those provisions of the 1937 Act waived by the MTW Operations Notice.

Documents relying upon the approved MTW Supplement (i.e., Administrative Plan, Admission and Continued Occupancy Plan, etc.) should be updated to reflect those policies. Also, the approved MTW Supplement and all required attachments and documents should be available for review and inspection at the PHA's principal office during normal business hours.

If you have any questions, please contact Zachariah Woodard, Portfolio Management Specialist, at (803) 253-3232 or [Zachariah.J.Woodard@hud.gov](mailto:Zachariah.J.Woodard@hud.gov).

Sincerely,

Eric Bickley  
Director  
Public Housing Program Center

cc: John Concannon, MTW Program Director  
Valesha Arnold, Housing Innovations Specialist