

PHA Name : Fort Mill

PHA Code : SC036

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: MTW Flexibility for Smaller PHAs

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

The first year of MTW has been a definite learning experience, however no major changes occurred for residents that they would fee. The landlord incentive has been a plus and hope that it leads to referrals also since there are so many landlords and apartment complexes in the area that do not accept vouchers for many reasons.

In order to improve the Cost Effectiveness and Reduce the Administrative burden from the beginning of the Housing Authority's program January 1, 2024 the inspection process has been changed to biannual, the reexaminations were done for all households on January 1, 2024 and will continue with that at least until the complete phase in is complete. The minimum rent increase only affected 3 families and there were no complaints from them. Notices have been sent to all families of the future increase and will continue to do so over the next few months. Assets not being verified unless over \$50,000 is an immense time sav er for everyone. The new utility allowance average should be an enormous time saver for the Housing Authority and make it easier for a client to comprehend.

The Housing Authority's overall prospective is to increase participant self - sufficiency. The last few years with COVID have been difficult however the country is definitely in rebound. This also taught individuals that they can work remotely or open avenues to new jobs. The Housing Authority tries to share any information about job fairs or opportunities that may be available. Homeowner education classes are available with the office having trained staff members. The hope for the work requirement is to motivate individuals, perhaps in small increments to become gainfully employed, as well to save funds that are being provided for HAP.

The Housing Authority will continue to offer the landlord incentive for new lease up's as well as referral bonus for a new landlord that leases. currently, ways are being sought to reach out to landlords whether it be through flyers, social media, or other avenues. The Housing Authority covers a large area with the town of Fort Mill, Tega Cay and the area known as Indian Land located in Lancaster county. The property is expensive, but affordable units can be found. The initial family rent burden being changed can also be a helpful tool. The Housing Authority will also look into paying application fees for tenants, with a limit of times of course, perhaps with a voucher system of guaranteed payment.

The overall goal for the Housing Authority is to have a prosperous program with prosperous clients that will eventually be able to be self sufficient, then allowing for new clients to come on the program and get their help to move forward.

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).

1. Tenant Rent Policies	
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)	Currently Implementing
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)	Currently Implementing
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Currently Implementing
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)	Currently Implementing
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
2. Payment Standards and Rent Reasonableness	
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
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
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)	Currently Implementing
5. Housing Quality Standards (HQS)	
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)	Currently Implementing
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
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
10. Family Self-Sufficiency Program with MTW Flexibility	
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
11. MTW Self-Sufficiency Program	
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
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Currently Implementing
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
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
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
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

1.f. - Minimum Rent (HCV)
<p>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</p> <p>The minimum rent was changed to \$75.00 1/1/24 for all households. All residents were notified of an increase to \$100.00 for 1/1/2025. No clients have stated an undue hardship with this increase however hardship exceptions are available if necessary. An increase in minimum rent may encourage employment, however this has not been noticed at this time with a substantial difference. These changes save clients time and, in come 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>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>There has been minimal change for the first year</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>Yes</p>
<p>What is the status of the Safe Harbor Waiver request?</p> <p>The waiver was previously approved.</p>
<p>Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.</p> <p>This is an approved HUD waiver, certain provisions of sections 3(a)(3)(A) and 89(o)(2)(a)-(c) of the Act and 24 CFR 5.6328 and 5.630</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p>

No

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

\$100.00

1.h. - Total Tenant Payment as a Percentage of Gross Income (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

Effective January 1, 2025 the income percentage will be changed to 29% from 30% for all households. All clients have been notified of this change and will be notified monthly until the change occurs. This will be cost effective for the client with a savings of 1% if they are working or elderly / disabled.

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 revenue

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.

The first year, this was not in place and this should provide a very slight decrease for tenants total tenant payment, however with the work requirement being also done this year, it is a possibility they could offset each other. The average loss to the Housing Authority just on the percentage change would be \$1060 a month.

Does this MTW activity require a hardship policy?

Provided Already

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 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. This is agency wide.

Does the MTW activity require an impact analysis?

Yes

This document is attached.

What percentage of income will equal the Total Tenant Payment (TTP)?

29.00%

What is the income basis for calculating Total Tenant Payment?

This activity uses adjusted annual income as defined in 24 CFR 5.611 (as required for non-MTW PHAs)

1.j. - Alternative Utility Allowance (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 the utility allowances are derived from an average usage for different bedroom sizes and dwelling structures using the rates provided by the utility companies. An average utility allowance will be done by bedroom size effective January 1, 2025. This will include Electric, Natural Gas, Propane, Oil but will not do averages on water and sewer. Water and Sewer will continue to be done by company. The water and sewer have extreme differences based on whether or not in the township or in the county, or in the neighboring county that we serve. These utility allowances will be completed and sent out to all tenants no later than September 1, 2024 for a 30 day notice of comment and once approved by the Board of Commissioners be in effect for January with any possible corrections. This will definitely be a cost savings for the Housing Authority just in the time involved to do the many different allowances. With the tenants it can be either an advantage or disadvantage.

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.

This implementation will happen this year, so no data available to obtain this answer

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 an approved HUD waiver, certain provisions of sections 3(a)(3)(A) and 9(o)(2)(A)-(C) of the Act and 24 CFR 5.6328 and 5.630

Please describe the alternative method of calculating the utility allowances. Please explain how the method of

calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method.

This will be calculated with the current formatting by bedroom size and utility company and type of dwelling prior to obtaining averages. ie. a 3 bedroom house using Duke Energy and a 3 bedroom apartment using York Electric will now be averaged. There are also cases where Natural Gas and Electric will be averaged.

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 increases from 40 to 50%. This only applies to new clients. This will allow for clients to move in somewhere that may be somewhat above what can be comfortable rent and to help with the overall high rental rates and the requirements for a smaller voucher size holder into a larger unit. This past year, 32 vouchers have been issued and only 11 leased in the Fort Mill jurisdiction. Rental amounts are high.

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.

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.

This has not been in play this first year and hopefully will help with lease up if clients want.

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.

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

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.b. - Alternative Reexamination Schedule for Households (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

All households will have reexamination for the effective date of 1/1/2025. At that time, it will be determined what families will go to a 3 year interval of reexamination. Elderly and disable families will be on the 3 year exam period if on a fixed income. These families will still have a reexamination provided to HUD with any increases that may occur for fixed incomes, such as social security, however, the family will not need to provide any additional information with the Housing Authority using the EIV documents for those types of increases. All other working or non-working families will still be interviewed annually, unless the Housing Authority deems it unnecessary. No interim reexaminations will occur unless rent increases requested by the landlord, adding a household member, removing a household member, or changes that occur due to a hardship. This will also fall in line with the HOTMA proposed rule also. This will save the Housing Authority time as well as clients that have had to provide every change.

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.

This did not occur last year.

Does this MTW activity require a hardship policy?

Provided Already

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

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

What is the recertification schedule?

Other

Fixed incomes every 3 three years. All others annually.

How many interim recertifications per year may a household request?

0

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

Only interims done are for family size changes or hardship

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 \$50,000 (this was changed due to the upcoming HOTMA program). 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 HPA paid on behalf of tenants.

This is a definite time saver. The majority of clients to do not have extensive assets and verifying minimal asset information is very time consuming

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.

This is a time saver

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 an approved HUD waiver, plus it ia HOTMA requirement

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

\$50,000.

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 pay \$500.00 incentive for household leased with a voucher. There have been 11 payments since 1/1/2024. Currently there are over 19 apartment complexes and 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. The new landlord referral has not come to fruition, but hopefully in the coming year.

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.

There have been 11 lease ups during this current year with hope of more. Not sure if the incentive was the reason, however it could not have done damage. The COVID time left the Housing Authority of Fort Mill had an average of 22% lease up, and this has increased to 29% at the current time

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.

HUD approved waiver

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?

No maximum by a particular landlord, however \$500 per lease up

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

5,500

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

\$5,500

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

The agency will begin conducting regular inspections on a biennial basis, unless requested otherwise by either the tenant or the landlord. Currently, the Housing Authority's HQS / NSPIRE 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.

This is the first year that this has happened, even though this waiver was implemented during COVID times.

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.

A HUD approved waiver

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 January 1, 2025 for all non-elderly / non-disabled households. At that time each non-elderly / non-disabled household will be required to have at 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 education facilities to provide support. The Housing Authority will also provide homeownership classes and other classes to assist participants in self-sufficiency.

January 1, 2024 all non-elderly / non-disabled households who wish to move to the Housing Authority's jurisdiction through portability are required to have an adult member who is employed and working an average of 30 hours per week or a letter of offered employment, else their request to transfer will be denied and the portability paperwork will be returned to the initial PHA.

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.

This will be the first year that an actual number is put into place for current participants. This has only been in effect for parts the current year.

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); 3.b. - Alternative Reexamination Schedule for Households (HCV); 12.b. - Work Requirement (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.

For participants to become more self sufficient

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 for 10 hours a week at minimum wage. This can be with employer or self employed.

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

Through annual reexams and use of EIV

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

Department of Social Services and SC Department of Employment and Workforce

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

Households will still be responsible for a minimum of 10 hours at minimum wage

How many households are currently subject to the policy?

66

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

0

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

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</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>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No</p>

E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers? No</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	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.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
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G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. 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.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	5
	Below 30% Area Median Income	11
	Total Local, Non-Traditional Households	16

*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.

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline. This will be reviewed this year with the rent reasonableness, prior to October 2024. The rents have changed dramatically in the last 5 years however they have stayed the same the last couple of years. It is not the plan at this time to stop doing rental comparisons for each new admission.</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # 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.	0 # 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?
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G.4 Comparable Mix (by Family Size) – Local, Non-Traditional.	
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.	
Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	2
2 Person	4
3 Person	9
4 Person	1
5 Person	
6+ Person	
Totals	16

H.	Public Comment
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.	

I.	Evaluations.
No known evaluations.	

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

5C036
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 Howard
NAME OF AUTHORIZED OFFICIAL

Executive Director
TITLE

Connie Howard
SIGNATURE

7/22/2024
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.*

RESOLUTION NO. 820

HOUSING AUTHORITY OF FORT MILL MTW SUPPLEMENT AND ANNUAL PLAN 2024 - 2025

Whereas, The Housing Authority of Fort Mill provided a Supplement to the U.S. Department of Housing and Urban Development for the Moving-To-Work program. This supplement is included with this resolution;

Whereas, The Housing Authority of Fort Mill provided the annual plan HUD-50075 HCV to the U.S. Department of Housing and Urban Development to include the Moving-To-Work program. A copy of this form is included with this resolution;

Whereas, The Housing Authority of Fort Mill had a Public Hearing on Thursday, May 9, 2024 at 4:00 P.M. to discuss the Section 8 Housing Choice Voucher Agency Annual Plan;

Whereas, The Housing Authority of Fort Mill provided the Board of Commissioners the notice of the meeting and who was in attendance.

Whereas, The Housing Authority will continue to provide Fair Housing within the Fair Housing Act, including the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and Title II of the American Disabilities Act of 1990. All programs will be reviewed to identify any impediments to fair housing choices within the program and work with the local jurisdictions to implement any affirmative fair housing that may require the Housing Authority's involvement and maintain records reflecting any actions that may occur.

Whereas, The Housing Authority will continue to comply with Section 3 requirements as required with the Department of Housing and Urban Development. The Housing Authority will continue to comply with drug free housing and workplace. The Housing Authority will comply with requirements regarding lobbying including disclosure forms.

Whereas, The Housing Authority will continue to maintain NSPIRE, National Standards for the Physical Inspection of Real Estate for all participants on the Section 8 program. The Housing Authority will also comply with any Lead Based Paint rules that may apply.

Whereas, The Housing Authority will continue to seek means to reduce cost and achieve greater cost effectiveness of Federal funds. The Housing Authority will provide incentives for families that are working, seeking work, or participating in job training, educational or other programs that assist in becoming self-sufficient. The Housing Authority will continue to house and increase housing choices for low-income families.

Whereas, The Housing Authority of Fort Mill has created a Moving-To-Work plan that explains the following details: Vision for PHA's Local MTW Program, Plan for Future Community / Resident Engagement, PHA Operating and Inventory Information, Plan for Local MTW Program, Proposed Use of MTW Funds, Evidence of Significant Partnerships, Significant Dates and Milestones for the PHA's Local MTW Program as described in PIH Notice 2018-17.

Whereas, the Supplement and the Annual Plan address the changes for the year that will be effective January 1, 2025. A minimum rent increase from \$75 to \$100. A decrease in the TTP from 30% to 29%. An average utility allowance. The change of rent burden from 40% to 50%. The minimum income requirement excluding elderly / disabled. The Annual Recertification schedule changes.

Approved by the Commissioners of the Housing Authority of Fort Mill on June 12, 2024.

All Commissioners listed below:

Brenda C. Young, Chairperson Brenda C. Young

W. Ira Coltharp, Jr., Vice Chairperson W. Ira Coltharp, Jr.

Elizabeth A. Barrett Elizabeth A. Barrett

Tammie Welch Tammie Welch

Jerry Ranson Jerry Ranson

Secretary, Connie Howard, Executive Director Connie Howard

Changes to Section 8 Program Under the Moving-To-Work (MTW) Conversion Effective January 1, 2025

The following changes will be made to the Section 8 program effective January 1, 2025, under the MTW Conversion:

- Minimum Rent will increase to \$100.00.
- The Total Tenant Payment will decrease from 30% of Monthly Adjusted Income to 29% of Monthly Adjusted Income.
- The Utility Allowance Schedule will be developed that averages rates from the different companies and across the different unit types, only allowing for variances in bedroom size. Allowances for water and sewer cost will not be averaged but will be determined by company and bedroom size.
- The Initial Rent Burden will increase from 40% of monthly adjusted income to 50% of monthly adjusted income.
- The minimum household income, for all non-elderly/ non-disabled households, will be calculated to 10 hours per week at the current federal minimum wages (\$7.25/ hour). This will put the minimum household income at \$3,770.00.
- The annual recertification date for all households is now January 1st.
- All fixed-income households, households where the only income is from a fixed-income source, will only have to complete their annual recertification paperwork every 3 years following the January 2025 recertification. The Housing Authority will still complete an annual recertification every year, including adding any Cost-of-Living Adjustment as determined by the Social Security Administration and updating the household's Utility Allowance.
- No Interim Recertifications will be done, except in the following instances:
 - Rent increases requested by the landlord in accordance with the HAP contract.
 - Adding a household member. New members will only be added in accordance with the Housing Authority's policies.
 - Removing a household member. Members will only be removed in accordance with the Housing Authority's policies.
 - Changes due to hardship. The hardship must be requested by the household and approved by the Housing Authority. All changes completed due to hardship will be effective for 60 days.