

PHA Name : The Greenville Housing Authority

PHA Code : SC004

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

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Created by Congress in 1996, Moving to Work (MTW) is a Department of Housing and Urban Development (HUD) demonstration program that allows housing authorities to design and test innovative, locally designed strategies for providing low-income families with affordable housing and new paths to economic independence. MTW is currently the only mechanism through which public housing authorities can transform housing delivery, programs, and operations. Until recently, there were only 39 Housing Authorities across the country that were designated as MTW Agencies.

The 2016 Appropriations Act provided authorizes an expansion of MTW by designating and additional 100 PHAs over seven years by September 2022. The 2016 MTW Expansion Statute provides that PHA's selected must participate in an applicable cohort to enable research of HUD identified regulatory waivers.

The Greenville Housing Authority (TGHA) was selected in 2021 under Cohort #4, Landlord Incentives. Under this MTW Cohort, TGHA will implement various financial and administrative incentives to attract new landlords and retain current landlords in the HCV Program. An evaluation of alternate rent policies will be conducted by HUD for a period of four years. To effectively evaluate the alternative rent, TGHA must forgo the ability to utilize certain MTW waivers associated with landlord incentives for a period of four years after the Landlord Incentive policies are fully implemented.

Moving to Work will enable TGHA to tailor our programs to best meet community needs and to quickly react to changes in the economy and rental market. Our community's affordable housing crisis demands prompt action and thoughtful policy innovation. As described in the sections below, our MTW status is vital to how TGHA operates as an effective and efficient public agency while serving over 4,100 households.

MTW has three statutory goals:

Reduce cost and achieve greater cost effectiveness in federal expenditures. Give incentives to families with children where the head of household is working, is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and Increase housing choices for low-income families.

The following 2023 Moving to Work Plan details how TGHA intends to use our flexibility in the coming year to further the statutory goals.

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)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
o. Initial Rent Burden (HCV)	Not Currently Implemented
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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Plan to Implement in the Submission Year
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
b. Damage Claims (HCV-Tenant-based Assistance)	Plan to Implement in the Submission Year
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
b. Increase PBV Project Cap (HCV)	Plan to Implement in the Submission Year
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
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 The Greenville Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.h. - Total Tenant Payment as a Percentage of Gross Income (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 Greenville Housing Authority will modify the percentage of income used in the calculation of total tenant payment. The tenant payment in the Housing Choice Voucher Program will be equal to 32% of monthly adjusted income.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</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>Neutral (no cost implications)</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 only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>All Housing Choice Voucher participants not otherwise excluded will be included for participation in this activity.</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>N/A</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p>

Yes
<p>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</p> <p>1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 3.b. - Alternative Reexamination Schedule for Households (HCV); 7.b. - Term-Limited Assistance (HCV); 12.b. - Work Requirement (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>What percentage of income will equal the Total Tenant Payment (TTP)?</p> <p>32.00%</p>
<p>What is the income basis for calculating Total Tenant Payment?</p> <p>This activity uses a different definition of income because we are using the following MTW waivers (check all that apply)</p> <p>1.t. and/or 1.u. "standard deductions"</p>

<p>1.j. - Alternative Utility Allowance (HCV)</p>
<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 Greenville Housing Authority will utilize utility allowance schedules for tenant paid utilities for all single-family and multi-family structure types in the Housing Choice Voucher Programs. The utility allowances will be based on the size of the voucher issued to the family regardless of the size of unit chosen.</p> <p>The utility allowance schedules will be calculated using the average consumption and costs for all utility types. TGHA will utilize a third-party vendor to review the utility allowance schedules each year. If the average consumption and/or costs have increased or decreased by more than 10% from the previous year, the schedule of allowances will be updated to reflect current consumption and costs.</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>Neutral (no cost implications)</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>

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.

N/A

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

No

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.

The Utility Allowance will simplify the certification process by basing the allowance on the size of the voucher regardless of the size of the unit and will be based on the average consumption for all utility types for all single-family and multi-family structures.

This will eliminate the need for property-based utility allowances and will be more cost efficient to the Agency.

1.n. - Utility Reimbursements (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 Greenville Housing Authority will eliminate the Utility Housing Assistance Payment (UHAP) in the Housing Choice Voucher Program. If a utility allowance is greater than the total tenant payment, the tenant rent will equal zero (\$0.00) and no reimbursement will be provided to the HCV participant.

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

Cost effectiveness; 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.

N/A

1.u. - Standard Deductions (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 Greenville Housing Authority will eliminate all current deductions and provide a single standard deduction for all Housing Choice Voucher participants. The single standard deduction will be based on household size as reflected in the chart below.

Household Size Standard Deduction

1 Person \$500

2 Persons \$1,000

3 Persons \$1,500
4 Persons \$2,000
5 Persons \$2,500
6+ Persons \$3,000

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

Cost effectiveness; 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.

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.

N/A

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?

No

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

No

How much will the single standard deduction be in the Fiscal Year?

\$500

2.a. - Payment Standards- Small Area Fair Market Rents (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 Greenville Housing Authority will adopt local MTW Payment Standards based on the Primary Real Estate Submarkets (PRESM's) within the City and county.

TGHA will utilize a third-party firm to conduct a market study to identify the rental submarkets and to complete a rent survey that will identify the actual market rents within each submarket.

A separate payment standard schedule will be adopted for each PRESM based on the 75th percentile of the market rents for that submarket provided that the payment standard is not less than 80% nor more than 150% of the HUD Small Area Fair Market Rent for the applicable zip codes within the PRESM.

This activity will assure that the HCV Program does not unintentionally inflate rents in sub-markets, particularly those of high poverty and high minority concentration. Units in these areas will be limited to actual rents based on market demand versus HUD published FMR's.

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

Cost effectiveness; 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.

N/A

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?

No

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

No

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

Prime Real Estate Submarkets will be studied by a third-party and established within the HUD SAFMRs. Boundaries may overlap SAFMR (Zip Code) areas.

2.d. - Rent Reasonableness – Third-Party 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 Greenville Housing Authority will utilize the MTW flexibility to perform rent reasonableness determination on Project Based and Tenant Based Voucher units that are owned, controlled, or managed by TGHA or a related affiliate.

TGHA will utilize the third-party market studies submitted to lenders and investors for new projects to be developed under the PBV program. Rent for existing PBV properties and for owner requested rent increases, will be based on the market rate rent in the property, if applicable, with no further comparison required. For properties with no market rate units, TGHA will secure a property specific rent comparability study.

In the Tenant Based Voucher Program, TGHA will assure that the rent charged for TGHA controlled units is never higher than the applicable amount under the MTW Alternate Payment Standards. TGHA will review the average rent for comparable properties within its voucher program when determining the reasonableness of the rent charged for TGHA controlled units.

For quality assurance purposes, a staff supervisor will review all rent reasonable determinations by staff for TGHA controlled units with tenant-based vouchers. Documentation will include a worksheet that identifies all key criteria of comparable units with the subject unit that provides justification for the rent amount.

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

Cost effectiveness; 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.

N/A

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

No

Please explain or upload a description of the quality assurance method.

For quality assurance purposes, a staff supervisor will review all rent reasonable determinations by staff for TGHA controlled units with tenant-based vouchers. Documentation will include a worksheet that identifies all key criteria of comparable units with the subject unit that provides justification for the rent amount.

No document is attached.

Please explain or upload a description of the rent reasonableness determination method.

TGHA will utilize the third-party market studies submitted to lenders and investors for new projects to be developed under the PBV program. Rent for existing PBV properties and for owner requested rent increases, will be based on the market rate rent in the property, if applicable, with no further comparison required. For properties with no market rate units, TGHA will secure a property specific rent comparability study.

No document is attached.

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

The Greenville Housing Authority will implement triennial recertifications for all households in which all members of the household are 62 and older or the Head of Household is disabled, even if household members have earned income, they will be recertified only on a triennial basis. To achieve the highest level of operational efficiency, TGHA will stagger the implementation of this activity.

For all households, including those listed above:

Interim recertifications for decreases in income will be limited to \$200 per month or more. Reductions in income for less than \$200 per month are required to be reported, but no interim recertification will be completed.

Interim recertifications for increases of income will be limited to a change of \$500 or more per month. Increases in income of less than \$500 per month are required to be reported, but no interim recertification will be completed.

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

Cost effectiveness; 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 only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?
New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types?
The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity.
Other – another specifically defined target population or populations.
If Other Selected in Previous Question: Please describe this target population in the text box.
Housing Choice Voucher families in which all members of the household are 62 and older or the Head of Household is disabled, even if household members have earned income, they will be recertified only on a triennial basis.
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.
All tenant-based units and project based voucher properties that meet the targeted population.
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.
N/A
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?
No
Does the impact analysis apply to more than this MTW activity?
Yes
Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)
3.b. - Alternative Reexamination Schedule for Households (HCV)
What is the recertification schedule?
Once every three years
How many interim recertifications per year may a household request?

2 or more

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

Interim recertifications for decreases in income will be limited to \$200 per month or more. Reductions in income for less than \$200 per month are required to be reported, but no interim recertification will be completed.

Interim recertifications for increases of income will be limited to a change of \$500 or more per month. Increases in income of less than \$500 per month are required to be reported, but no interim recertification will be completed.

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

The Greenville Housing Authority will implement a self-certification process for all households in the Housing Choice Voucher Programs when the total household assets are less than \$50,000 (fifty thousand dollars).

TGHA will provide applicants and participating households with a standardized certification form to be completed at the time of admission or triennial recertification.

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.

N/A

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

No

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

\$50,000.

4.a. - Vacancy Loss (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

The Greenville Housing Authority will provide a vacancy payment to landlords in Tenant Based Voucher Program when the landlord rents to another voucher participant following the move out of a previous voucher participant.

The vacancy period will begin at the end of the month for the month in which the assisted tenant vacates the property and continue until the HAP contract effective date for a new assisted tenant.

The amount of the vacancy payment will be the lesser of the actual vacancy days or one month contract rent for the new HAP contract. Payment will be made to the landlord at the time of the first payment under the new HAP contract.

Vacancy payments for the Project Based Voucher Program will be paid in accordance with the applicable PBV HAP contract for the property.

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 only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based units and properties with project-based vouchers.

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.

N/A

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

No

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?

The payment will be the lesser of the actual vacancy days or one month contract rent for the new HAP contract or for the Project-based Voucher Program will be paid in accordance with the applicable PBV HAP contract for the property.

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

4.b. - Damage Claims (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

The Greenville Housing Authority will provide payments to landlords for tenant caused damages when the landlord leases to a new voucher tenant following the move out of a previous voucher tenant.

The security deposit paid by the tenant shall first be applied to the amount of the cost of damages. The total amount of damages to be paid by TGHA will be the lesser of the actual costs to repair the damages less the tenant security deposit

not otherwise applied to other charges or two months contract rent.

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.

N/A

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

No

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?

The total amount of damages to be paid by TGHA will be the lesser of the actual costs to repair the damages less the tenant security deposit not otherwise applied to other charges or two months contract rent.

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

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

The Greenville Housing Authority will provide an incentive payment to new landlords that have not previously participated in the Housing Choice Voucher Program.

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 only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

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.

N/A

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

No

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?

The incentive payment will be equal to one month's contract rent and will be paid upon execution of a Housing Assistance Payments Contract.

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.c. - Third-Party 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 Greenville Housing Authority will utilize the MTW flexibility to perform Housing Quality Standards (HQS) inspections on Project-Based and Tenant-Based Voucher units that are owned, controlled, or managed by TGHA or a related affiliate.

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.

N/A

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

No

Please explain or upload the description of the quality assurance method:

Following will explain the quality assurance method
For quality assurance purposes, a staff supervisor will conduct quality controls inspections for 20% of all inspections completed by staff for TGHA controlled units with Project Based or Tenant Based vouchers.

No document is attached.

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

Narrative - Description of Proposed MTW Activity

The Greenville Housing Authority will utilize an alternate inspection schedule. All Housing Choice Voucher units will be inspected on a triennial basis.

Interim inspections will be conducted upon request of a program participant or a report from a third-party entity such as the code enforcement department or social service agency indicating concerns with the condition of the unit.

To achieve the highest level of operational efficiency, TGHA will stagger the implementation of this activity over three years to ensure that the numbers of inspections are scheduled evenly over the execution period.

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.

N/A

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

No

9.a. - Increase PBV Program Cap (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

TGHA will increase the Project Based Voucher Program cap to up to 50% of its baseline voucher allocation. Exempt units described in PIH 2017-21 will continue to be exempt from the MTW 50% cap.

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.

N/A

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

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (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

TGHA will increase the Project Based Voucher Program project cap to up to 100% of units in a project regardless of project type. Projects serving families will not be required to provide supportive services to project based up to 100% of the units.

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.

N/A

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

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (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

TGHA will eliminate the selection process in the award of Project Based Vouchers to a property owned by a sole asset entity that is an affiliate of and controlled by TGHA. Such projects shall be subject to site selection requirements; subsidy layering approval; and HQS inspections performed by an independent entity.

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.

N/A

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

No

9.f. - Increase PBV HAP Contract Length (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

TGHA will increase the length of a HAP contract for up to 40 years. The determination of the length of the HAP contract will be based on the applicable financing for the project. The term will run congruently to the term of the first mortgage financing or in the case of Low-Income Housing Tax Credits consistent with the extended compliance period.

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.

N/A

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

No

9.h. - Limit Portability for PBV Units (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

TGHA will provide a Choice Mobility voucher to a participant that has resided in a Project Based Voucher for a minimum of 24 months. A PBV participant may request a Choice Mobility voucher at the second anniversary of their PBV lease agreement. The property management agent for the PBV property must certify that the tenant is in compliance with all terms and conditions of their lease agreement and their PBV family obligations. Upon approval from the management agent, the participant will be placed on the Choice Mobility waiting list. Choice Mobility applicants will be offered tenant-based vouchers as available based on the date of request. If not approved, participants shall be entitled to a review of the denial pursuant to the review process outlined in the Administrative Plan.

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 only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies to all family types

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all properties with project-based vouchers

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.

N/A

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

No

11.a.HCV - Alternative Family Selection Procedures (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

Mandatory Self-Sufficiency Program

Description - Participation in a self-sufficiency program is a condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants. All able-bodied individuals ages 18 through 61 are required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the Mandatory MTW Self-Sufficiency (MTW SS) Program and is held accountable for progress of all household members. The

Head of House will enter into a Contract of Participation for a maximum ten (10) year MTW SS Program limit.

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.

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 only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

Applies to all tenant-based units and properties with project-based vouchers.

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.

N/A

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?

No

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

Yes

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

12.b. - Work Requirement (HCV)

Will the MTW agency's MTW Self-Sufficiency policy make the program mandatory for anyone?

Yes

Please describe the population group for whom participation in the MTW Self-Sufficiency program is mandatory.

Participation in a self-sufficiency program is a condition of eligibility for new admissions and a condition of continued occupancy for existing residents and participants. All able-bodied individuals ages 18 through 61 are required to actively pursue activities to achieve economic self-sufficiency. The head of the household is required to develop a self-sufficiency plan that identifies goals and objectives for each household member required to participate in the Mandatory MTW Self-Sufficiency (MTW SS) Program and is held accountable for progress of all household members.

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

Work requirements shall be defined as employment for a minimum of 30 hours per week per household for all non-elderly, non-disabled household members aged 18 or older.

Household members may also meet the work requirement through enrollment on a full-time basis (as defined by the institution) in an educational program that offers a degree or certificate. Household members enrolled in an educational program must demonstrate successful progress towards the degree or certificate. Progress shall be defined as successfully completing 75% of all required course work on an annual basis. Documentation from the educational institution shall be required

New Admissions - New Admissions households including households porting from another jurisdiction will be provided one year from the date of the initial lease up in TGHAs jurisdiction to become compliant with MTW SS requirements. If a New Admission household is not compliant with MTW SS requirements prior to submission of a Request for Tenancy Approval (RFTA), they must meet with a MTW SS Coordinator and develop a MTW SS Plan. TGHA will not approve a RFTA until the household has developed a plan and executed the MTW SS Contract.

If a member of a household claims self-employment and is establishing a new business, they must provide documentation required by local, state, or federal law of the creation and/or existence of the business.

Rent Changes - If a household member is compliant with the employment requirements and subsequently experiences loss of employment, they shall be granted a 90-day waiver for the employment requirement. No rent change will be processed during the 90-day waiver period. Failure of a household member to re-secure employment within the 90 days shall be grounds for termination of housing assistance. Upon securing new employment, a rent change shall be processed to reflect the new employment wages. Only one waiver period shall be permitted within each calendar year.

If loss of employment is through no fault of the individual (lay-off, company closure, medical reason, etc.) an extension of a second 90-day waiver may be granted provided the individual can demonstrate that they are actively searching for new

employment or can provide a letter from a medical professional that provides a reason that the individual cannot seek employment. In these circumstances, a rent adjustment will be processed as applicable. Failure to secure new employment after a second 90-day waiver period shall be grounds for termination of housing assistance.

Individuals who lose employment more than once, for any reason other than a reduction in force, shall be required to enroll, attend, and complete a job retention program as directed by their MTW SS Coordinator.

Self-Employment - Individuals who are self-employed including childcare home providers must have a total annual gross income equivalent to the applicable State of South Carolina minimum wage times 1,560 hours to be considered in compliance with the employment requirements under the MTW SS Program. Copies of income tax forms filed with the IRS must be provided to claim self-employment; no other documentation shall be acceptable.

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.

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 only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers

Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.

All tenant-based units and non-elderly properties.

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.

N/A

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?

No

Does the MTW activity require an impact analysis?

Provided Already

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?

Work requirements shall be defined as employment for a minimum of 30 hours per week per household for all non-elderly, non-disabled household members aged 18 or older.

Household members may also meet the work requirement through enrollment on a full-time basis (as defined by the institution) in an educational program that offers a degree or certificate. Household members enrolled in an educational program must demonstrate successful progress towards the degree or certificate. Progress shall be defined as successfully completing 75% of all required course work on an annual basis. Documentation from the educational institution shall be required.

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

The agency will monitor compliance with the work requirement through regular conferences with the MTW SS coordinators, Housing Specialists, and the requirement to report any changes in income.

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

A robust mandatory MTW Self-Sufficiency program is a part of the term limit and work requirement. Financial incentives are also a part of the program, along with job retention and search assistance.

Financial Incentive - Financial Incentives will be provided in the form of a goal-based payment system. Families will be required to meet certain benchmarks of self-sufficiency and as a result, they will earn varying cash incentives with a maximum earning potential of \$13,000. In order to receive a credit for a milestone, the household must be in compliance with all MTW requirements for the quarter that the goal was achieved. TGHA will establish an escrow account and as goals are achieved the credit will be applied to the account. The goal-based credits will only be paid upon voluntary exit from the program(s) in good standing or completion of Contract of Participation. All credits will be forfeited for any household that is terminated from the program for cause or ports to another jurisdiction for any reason.

No partial credits will be provided; no credit will be earned if any member of the household was non-compliant for any time during the 12-month calendar period. The annual credits will accrue and will only be paid upon voluntary exit from the program(s) in good standing or upon expiration of the ten-year MTW Self Sufficiency program limit. All credits will be forfeited for any household that is terminated from the program for cause or ports to another jurisdiction for any reason.

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

Rent Changes - If a household member is compliant with the employment requirements and subsequently experiences loss of employment, they shall be granted a 90-day waiver for the employment requirement. No rent change will be processed during the 90-day waiver period. Failure of a household member to re-secure employment within the 90 days shall be grounds for termination of housing assistance. Upon securing new employment, a rent change shall be processed to reflect the new employment wages. Only one waiver period shall be permitted within each calendar year.

If loss of employment is through no fault of the individual (lay-off, company closure, medical reason, etc.) an extension of a second 90-day waiver may be granted provided the individual can demonstrate that they are actively searching for new employment or can provide a letter from a medical professional that provides a reason that the individual cannot seek employment. In these circumstances, a rent adjustment will be processed as applicable. Failure to secure new employment after a second 90-day waiver period shall be grounds for termination of housing assistance.

Individuals who lose employment more than once, for any reason other than a reduction in force, shall be required to enroll, attend, and complete a job retention program as directed by their MTW SS Coordinator.

Self-Employment - Individuals who are self-employed including childcare home providers must have a total annual gross income equivalent to the applicable State of South Carolina minimum wage times 1,560 hours to be considered in compliance with the employment requirements under the MTW SS Program. Copies of income tax forms filed with the IRS must be provided to claim self-employment; no other documentation shall be acceptable.

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

17.c. - Housing Development Programs
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 Greenville Housing Authority will utilize MTW funding to expand affordable housing in the City and County of Greenville through acquisition, substantial rehabilitation and/or new construction of single-family and multi-family housing units. Funds will be used as financing for with TGHA Project Based Vouchers. TGHA will not utilize more than 10% of its total annual budget authority for its Housing Choice Voucher Program to fund this activity.
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.
N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?
No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Perry Avenue Units	New Construction	Gap Financing	14.00	14.00	0.00	14.00	0.00	0.00
Arcadia Hills	New Construction	Gap Financing	16.00	16.00	0.00	16.00	0.00	0.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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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? Yes</p> <table border="1" data-bbox="214 1243 1523 1287"> <thead> <tr> <th data-bbox="214 1243 760 1287">Title</th> <th data-bbox="760 1243 1523 1287">Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td data-bbox="214 1287 760 2018"> </td> <td data-bbox="760 1287 1523 2018"> </td> </tr> </tbody> </table>	Title	Supporting Documents Attached		
Title	Supporting Documents Attached				

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>
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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
2021	\$543,729	\$543,729	\$0	2021-12-31
2022	\$552,156	\$454,535	\$97,621	2022-12-31

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	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

*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.

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?

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.	
Occupied Number of Local, Non-Traditional units by	

Family Size:	Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

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.
	No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver

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 January 1, 2023, 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 identity, 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.

The City of Greenville Housing Authority, SC

SC004

MTW PHA NAME

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).

Peter Byford

Chair

NAME OF AUTHORIZED OFFICIAL

TITLE



October 6, 2022

SIGNATURE

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.*

EXHIBIT A – HARDSHIP POLICY

MOVING TO WORK SUPPLEMENT 2022-2023

HARDSHIP OVERVIEW

The Greenville Housing Authority recognizes that several policies implemented under the Moving to Work flexibilities may have an adverse impact on some households. This hardship policy is designed to minimize any negative impact the MTW policies may have on assisted households.

The chart below identifies the MTW activities that could negatively impact assisted families and the groups to which the hardship for each activity will apply.

Hardship Policy
Tenant Payment Modified Percent of Income
Standard Deductions
Payment Standards
Alternate Re-certifications
Term-Limited Assistance
MTW Self-Sufficiency Program
Work Requirements
Alternative Verification Hardship

A hardship review committee will be established by TGHA that will be responsible for the review and approval or denial of all hardship requests received under this policy.

This hardship policy presents eligibility criteria and remedies for different types of hardships. The different types of hardships below are not mutually exclusive. If a household's circumstances correspond to more than one type of hardship, they will receive the hardship most beneficial to them.

HARDSHIP POLICIES

TGHA will review its hardship policies with families during initial eligibility and recertifications. TGHA will review all proposed program terminations and consider if a household qualifies for a hardship exemption prior to a final termination.

- There is no limit to the number of hardships that a household may request and receive.
- If a household is approved for a hardship, and subsequently experiences another adverse event while still in hardship status, they may request an additional hardship that might impact their total tenant payment (TTP).
- If a household is approved for a hardship, they are not required to report subsequent income changes (increase or decrease) during the period of their approved hardship; the hardship rent will remain in effect until the end of the period approved for the hardship.

- If a household is approved for a temporary hardship, when that hardship is scheduled to expire the household will be notified and may request an extension.

HARDSHIP REQUEST AND APPROVAL PROCESS

Households who request a hardship will be subject to the hardship process outlined below.

- All hardship requests must be in writing.
- When a household makes a written request for a hardship exemption from a required MTW activity, TGHA will request verification of the hardship.
- Households will be required to provide verification of the hardship within 14 calendar days from the date of the hardship request.
- Within 14 calendar days from receipt of verification of the hardship, TGHA will make a determination as to whether or not to grant the hardship.
- Approved hardships will take place on the first of the month after the hardship is approved. If there is a delay in determining the hardship, through no fault of the household, TGHA will make the hardship TTP retroactive to the first of the month following receipt of the verified request.
- The hardship TTP will be calculated consistent with applicable TGHA hardship policies described further below and will remain in effect for the period for which the hardship has been granted.
- If a hardship request is denied, TGHA will provide the household with an opportunity to request an informal review for a second level review of the denied hardship request.
- TGHA will retain records of all hardship requests received and the results of these requests and supply them at HUD's request. TGHA will retain this information for the duration of TGHA's participation in the MTW demonstration program and make such information available for public review and inspection at TGHA's principal office during normal business hours.

HARDSHIP TYPES, CRITERIA AND REMEDIES

High Rent Burden – This hardship type applies to the MTW Activities listed below.

Tenant Payment Modified Percent of Income
Standard Deductions
Payment Standards
Alternate Re-certifications
Alternate Verification Hierarchy

If the household's TTP will exceed 40% of their monthly adjusted income as the result of one of the above activities, a hardship may be requested in accordance with the procedures set forth above.

If the hardship is approved, TGHA will set the households TTP to 40% of their current adjusted monthly income or the minimum rent, whichever is greater.

The hardship exemption under this criterion will be for a temporary period of ninety days. The household may request an extension or reapply for another hardship under this criterion

Self-Sufficiency, Work Requirement, and Term-Limit Hardships - A household may request a hardship exemption from the Self-Sufficiency and/or Work Requirement and may request an extension to the Term-Limit. TGHA will consider these requests on a case-by-case basis and decisions will be made by the hardship review committee.

The hardship review committee will determine if the circumstances are beyond the household's control and make it difficult for the household to comply with the self-sufficiency, work requirements, and term limit policies.

If it is determined that a hardship does exist, TGHA will determine if the exemption is temporary or permanent. If temporary, TGHA will establish the time of the temporary exemption.

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1h. Tenant Payment Modified Percent of Income
1. Impact on TGHA Finances	
This activity is not expected to impact finances; the average per unit cost of housing subsidy in the HCV program may decrease over time and allow TGHA to support other MTW activities.	
2. Affordability of Housing Costs for affected families.	
Housing costs are expected to increase slightly for non-exempt households. However, the hardship policies in effect will minimize any extreme impact for families.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact the termination and/or eviction rate.	
5. Utilization Rate in HCV	
This activity will have no impact on the utilization rate in HCV.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
Tenant rent modified percent of income contributes towards self-sufficiency. This activity will better prepare residents for private market housing in which rent is not tied to household income.	
7. Impact on TGHA’s Ability to Meet MTW Statutory Goals	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
8. Impact on Rate of Hardship Requests	
This activity is expected to result in some hardship requests. However, many HCV participants are already paying up to 40% of their monthly income towards rent as they elected a larger unit size than their voucher or simply because they have chosen a higher cost unit.	
9. Impact on Protected Classes and Associated Disparate Impact	
Elderly and disabled households are exempt from this activity	

IMPACT ANALYSIS	
MTW Activity – Payment Standards and Rent Reasonableness	2a – Payment Standards
1. Impact on TGHA Finances	
This activity is expected to increase the average per unit costs in the voucher program. However, TGHA will manage these increased costs through a higher voucher success rate which will assure maximum program utilization which has been unachievable without MTW flexibilities.	
2. Affordability of Housing Costs for affected families.	
This activity is not expected to impact the affordability of housing costs for voucher families.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact the termination and/or eviction rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is expected to have a very positive impact on the utilization rate in the HCV program as rents will be more comparable with the real rents in the various locations throughout the City and County.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on the meeting the MTW goals as it will significantly expand housing choice for voucher holders.	
7. Impact on TGHA’s Ability to Meet MTW Statutory Goals	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
8. Impact on Rate of Hardship Requests	
This activity is not expected to impact the rate of hardship requests.	
9. Impact on Protected Classes and Associated Disparate Impact	
This activity is not expected to impact any protected class and will have not disparate impact.	

IMPACT ANALYSIS	
MTW Activity – Reexaminations	3a and 3b – Alternate Reexamination Schedule
1. Impact on TGHA Finances	
This activity is expected to have an impact on finances through a slight increase in per unit costs in the voucher program. TGHA will offset these costs through savings that will result from reduced staff and administrative time.	
2. Affordability of Housing Costs for affected families.	
This activity will positively impact affordability for families as rent increases will only take effect only when income increases significantly. Families will have increased disposable income for other needs.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact the termination and/or eviction rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is not anticipated to impact occupancy or utilization rates.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on the meeting the MTW goals as it will result in cost effectiveness for TGHA and provide additional self-sufficiency initiatives for the elderly and disabled families as they have additional available income for two years without an increase in rent.	
7. Impact on TGHA’s Ability to Meet MTW Statutory Goals	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
8. Impact on Rate of Hardship Requests	
This activity is not expected to impact the rate of hardship requests.	
9. Impact on Protected Classes and Associated Disparate Impact	
This activity is not expected to impact any protected class and will have not disparate impact.	

IMPACT ANALYSIS	
MTW Activity – Term-Limited Assistance Self-Sufficiency Program Work Requirement	7b – Term-Limited Assistance 11a and 11b – MTW Self-Sufficiency Program 12b – Work Requirement
1. Impact on TGHA Finances	
These activities are expected to have an impact on finances. The annual financial incentive is expected to exceed the current FSS escrow deposits. However, it is anticipated that self-sufficiency activities and work requirements will result in increased tenant earned income which will reduce average HAP costs. The Term-Limited Assistance is not expected to have an impact on finances.	
2. Affordability of Housing Costs for affected families.	
This activity will not have any impact on the housing costs for affected families as households will continue to pay the same percent of their household income for their portion of rent.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact the termination and/or eviction rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is not anticipated to impact occupancy or utilization rates.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on the meeting the MTW goals as it will provide additional self-sufficiency initiatives for the families as they work towards self-sufficiency, pursue educational, training and employment opportunities.	
7. Impact on TGHA’s Ability to Meet MTW Statutory Goals	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
8. Impact on Rate of Hardship Requests	
This activity will result in some hardship requests for individuals that are not able to actively seek self-sufficiency activities or work requirements. The hardship policy will allow families to seek relief from the activity as applicable.	
9. Impact on Protected Classes and Associated Disparate Impact	
This activity is not expected to impact any protected class and will have not disparate impact.	

IMPACT ANALYSIS	
MTW Activity – Self-Sufficiency Program & Work Requirement	11a and 11b – MTW Self-Sufficiency Program 12b – Work Requirement
1. Impact on TGHA Finances	
These activities are expected to have an impact on finances. The financial incentive is expected to exceed the current FSS escrow deposits. However, it is anticipated that self-sufficiency activities and work requirements will result in increased tenant earned income which will reduce average HAP costs.	
2. Affordability of Housing Costs for affected families.	
This activity will not have any impact on the housing costs for affected families as households will continue to pay the same percent of their household income for their portion of rent.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact the termination and/or eviction rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is not anticipated to impact occupancy or utilization rates.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on the meeting the MTW goals as it will provide additional self-sufficiency initiatives for the families as they work towards self-sufficiency, pursue educational, training and employment opportunities.	
7. Impact on TGHA’s Ability to Meet MTW Statutory Goals	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
8. Impact on Rate of Hardship Requests	
This activity will result in some hardship requests for individuals that are not able to actively seek self-sufficiency activities or work requirements. The hardship policy will allow families to seek relief from the activity as applicable.	
9. Impact on Protected Classes and Associated Disparate Impact	
This activity is not expected to impact any protected class and will have not disparate impact.	

AGENCY SPECIFIC WAIVER REQUEST

ACTIVITY E-1 – ALTERNATE VERIFICATION HIERARCHY

Under the Moving to Work (MTW) Operations Notice, MTW agencies are allowed to request Agency-Specific Waivers for activities that are not specially included in Appendix I of the Operations Notice. The Greenville Housing Authority is proposing to implement the following activity in the Housing Choice Voucher (HCV) programs pursuant to an Agency-Specific Waiver.

Narrative - Description of Proposed MTW Activity

This activity will waive provisions of HUD PIH Notice 2018-18 and successor notices to allow TGHA to utilize an alternative, streamlined method to verify household member income for all HCV program participants (including both tenant-based and project-based programs). TGHA intends to implement this alternative method to streamline program administration and reduce administrative burdens to benefit both clients and the agency.

This method has three changes to the current verification method:

1. Alter the verification hierarchy to the following:

Level	Verification Technique	Ranking
1	Upfront Income Verification using HUD's EIV System	Mandatory
2	Third Party Verification (Written or oral documented on a form and signed by TGHA staff)	High Supplement EIV Non-EIV reported income sources Disputes of EIV reported information
3	Self-Certification	High To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or When tenant cannot produce written third-party verification documents.

2. Extend the time that verifications are valid: for applicants, verifications may not be more than 180 days old at the time of voucher issuance. For tenants and participants, verifications for reexaminations may not be more than 180 days from the effective date. This policy is applicable when HC is verifying current/anticipated income.

3. In the case of fixed income verifications for applicants, tenants, and participants (e.g., Social Security award letters, fixed pensions, etc.), verifications are valid for the full calendar year in which they are effective.

These changes to the verification method will reduce cost and achieve greater cost effectiveness in federal expenditures by decreasing administrative time spent on the verification process while still gathering appropriate information. PHA staff will be able to move through the verification levels more efficiently to provide proficient service to clients and reduce duplicate work. Extending the amount of time verifications are valid for will save time by not re-requesting verification from applicants, tenants and participants that has fallen out of date, but is still an accurate reflection of their current situation.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness.

Cost Implications – This activity will have no cost implications to TGHA’s annual budget.

Different Policy by Household Status/Family Types – This MTW activity will apply to all assisted households.

Location/Site – This activity will apply to the Housing Choice Voucher Program.

Policy Impact Analysis – The Impact Analysis for this policy is attached as Exhibit B.

As required by the Department of Housing and Urban Development (HUD). The Housing Authority of the City of Greenville, SC posted our Fiscal Year 2023 Agency Annual Plan & MTW Supplement Plan.

Public Advertisement of the 45-Day Comment Period was posted on TGHA's website on August 15, 2022; public comments were received through September 27, 2022; and a public hearing was held on September 13, 2022. No guests were present, called in, and no comments were received from the public.

During the same Public Comment Period, The Housing Authority of the City of Greenville SC did review the Annual PHA Plan and Supplement with Resident Advisory Board and MTW Advisory Committee. No comments were received from either group.