

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below: An application has been submitted to the Special Applications Center(SAC) to process a Streamlined Voluntary Conversion of our remaining 155 Public Housing Units</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Project Based Vouchers.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Units with Approved Vacancies for Modernization.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).</p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p>The agency will continue to work with community stakeholders to meet the mission and goals of providing decent, safe, and affordable housing.</p>

B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p>
B.5	<p>Most Recent Fiscal Year Audit. The required audit was conducted for the agency for FY2021 but The report has not been completed.</p> <p>(a) Were there any findings in the most recent FY Audit? Based on the audit of Section 8 (HCV) program FY2020. A sample of 40 files were selected as the universe from a population of 2,2926. The test found 8 files had income calculation errors.</p> <p>Y <input checked="" type="checkbox"/> N <input type="checkbox"/></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Based on the audit of Section 9 program, the auditor identified that resident files were incomplete and did not contain all documentation used to complete annual and recertifications. Under a years old agreement, a third party Property Management company was managing the site, however that agreement has been terminated. we have increased our compliance review of third party files.</p> <p>(b) If yes, please describe:</p>
C.	<p>Other Document and/or Certification Requirements.</p>
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y <input type="checkbox"/> N <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D.	Affirmatively Furthering Fair Housing (AFFH).						
D.1	<p data-bbox="203 289 544 315">Affirmatively Furthering Fair Housing.</p> <p data-bbox="203 336 1404 451">Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <table border="1" data-bbox="203 472 1421 913"> <tr> <td data-bbox="203 472 1421 514">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="203 514 1421 913"> <p data-bbox="219 546 885 577"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p data-bbox="243 619 1404 693">The Housing Authority of the City of Greenville will continue to collaborate with community stakeholders to affirmatively further fair housing by identifying barriers and addressing those barriers to provide decent, safe and affordable housing in all communities of opportunity</p> </td> </tr> </table> <table border="1" data-bbox="203 934 1421 1333"> <tr> <td data-bbox="203 934 1421 976">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="203 976 1421 1333"> <p data-bbox="219 1008 885 1039"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </td> </tr> </table> <table border="1" data-bbox="203 1354 1421 1785"> <tr> <td data-bbox="203 1354 1421 1396">Fair Housing Goal:</td> </tr> <tr> <td data-bbox="203 1396 1421 1785"> <p data-bbox="219 1428 885 1459"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> </td> </tr> </table>	Fair Housing Goal:	<p data-bbox="219 546 885 577"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p> <p data-bbox="243 619 1404 693">The Housing Authority of the City of Greenville will continue to collaborate with community stakeholders to affirmatively further fair housing by identifying barriers and addressing those barriers to provide decent, safe and affordable housing in all communities of opportunity</p>	Fair Housing Goal:	<p data-bbox="219 1008 885 1039"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>	Fair Housing Goal:	<p data-bbox="219 1428 885 1459"><u><i>Describe fair housing strategies and actions to achieve the goal</i></u></p>
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Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a))

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k)) and 24 CFR §903.12(b).

Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

HOPE VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. ([24 CFR §903.7\(h\)](#))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further

fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

MTW SUPPLEMENT NARRATIVE

BACKGROUND

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 wholly 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 PHA's 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 2022 Moving to Work Plan details how TGHA intends to use our flexibility in the coming year to further the statutory goals.

OVERVIEW OF MTW GOALS AND OBJECTIVES

Short Term Goals - The Greenville Housing Authority has identified three primary goals that will drive its MTW activities. These goals will be our focus in the 2022 Plan year.

Goal 1 - Operational Efficiency through Innovation - Streamline business processes and implement advanced technological solutions that will result in operational cost efficiencies and enable reallocation of resources to local initiatives and strategies.

Cost Effective Activities to be implemented in Year 1

1. Rent Reform
2. Alternate Reexaminations
3. Alternate Inspections

Goal 2 - Self-Sufficiency - Provide alternate incentives designed to motivate families to actively seek financial independence and transition from dependency on housing subsidy. Carefully measure success of each incentive to identify and replicate the greatest motivators.

Self-Sufficiency Activities to be implemented in Year 1

1. Modified Tenant Rent Payments
2. MTW Mandatory Self-Sufficiency Program
3. Work Requirements

Goal 3 - Expand Housing Opportunities - Complete the conversion of all remaining Public Housing; redevelop existing sites and develop new housing in areas of opportunity throughout the City and County of Greenville.

Expanding Housing Opportunities to be implemented in Year 1

1. Landlord Incentives
2. MTW Project Based Voucher Program
3. Local Homeownership Program
4. Housing Development

Long Term Goals - The Greenville Housing Authority (TGHA) is working to empower low-income families, create opportunities and strengthen our community through innovative programs that promote economic mobility and inspire our residents.

Our Mission - "To provide quality affordable housing that serves as a foundation to improve lives."

Our Vision - "Vibrant, mixed-income housing communities of opportunity, that maximize individual potential, while sustaining the financial viability of our organization"

Quality affordable housing is a springboard for success in educational, employment and health pursuits. The 2022-2023 MTW Plan will enable TGHA to create change and invest in catalytic community building while ensuring the long-term financial viability of our organization.

MTW POLICIES TO BE IMPLEMENTED

1. Tenant Rent Policies
h. Tenant Payment as a Modified Percentage of Income
j. Alternate Utility Allowance
n. Utility Reimbursement
u. Standard Deductions
2. Payment Standards and Rent Reasonableness
a. Small Area Fair Market Rents
d. Rent Reasonableness Third Party Requirements
3. Reexaminations
b. Alternative Reexamination Schedule
d. Self-certification of Asses (HCV)
4. Landlord Leasing Incentives
a. Vacancy Loss
b. Damage Claims
c. Other Landlord Incentives (HCV)
5. Housing Quality Standards
a. Third-party Requirement
d. Alternate Inspection Schedule
9. Project Based Voucher Program
a. Increase PBV Program Cap
b. Increase PBV Project Cap
c. Elimination of PBV Selection Process
f. Increase PBV HAP Contract Length
h. Limit Portability for PBV Units
11. MTW Self-Sufficiency Program
d. Alternate Family Selection Procedures
e. Policies for Addressing Increases in Family Income
12. Work Requirements
b. Work Requirements HCV
17. Local Non-Traditional Activities
c. Housing Development Programs
AGENCY SPECIFIC WAIVER REQUEST
1. Alternate Verification Hierarchy
2. Local Homeownership Program

ACTIVITY 1.H – TENANT PAYMENT MODIFIED PERCENT OF INCOME

Narrative - Description of Proposed MTW Activity

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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Self-Sufficiency.

Cost Implications – This MTW activity is expected to be budget neutral.

Different Policy by Household Status/Family Types – This MTW activity will apply only to non-elderly and non-disabled households.

Location/Site – All Housing Choice Voucher participants not otherwise excluded will be included for participation in this activity.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 1.J – ALTERNATE UTILITY ALLOWANCE

Narrative - Description of Proposed MTW Activity

The Greenville Housing Authority will utilize a single utility allowance schedule for tenant paid utilities for all structure types in the Housing Choice Voucher Programs. The utility allowance will be based on the size of the voucher issued to the family regardless of the size of unit chosen.

The utility allowance schedule 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 schedule 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.

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

Cost Implications – This MTW activity is expected to be budget neutral.

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

Location/Site – The alternate utility allowance schedule will apply to all Housing Choice Voucher participants.

ACTIVITY 1.N-UTILITY REIMBURSEMENT

Narrative - Description of Proposed MTW Activity

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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Self-Sufficiency.

Cost Implications – This MTW activity is expected to provide costs savings in both administrative time and HAP expense. Administrative savings will result from the reduced staff time to prepare and issue UHAP payments. HAP expense is expected to be slightly reduced by the amount of UHAP payments issued.

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

Location/Site – The elimination of UHAP payments will apply to all Housing Choice Voucher participants.

ACTIVITY 1.U-STANDARD DEDUCTIONS

Narrative - Description of Proposed MTW Activity

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

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

Location/Site – The standard deductions will apply to all Housing Choice Voucher participants.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 2.A - PAYMENT STANDARDS

Narrative - Description of Proposed MTW Activity

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 submarkets, 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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Expanding Housing Choice.

Cost Implications – TGHA anticipates that this activity could have an impact on the HCV budget if it results in significant moves with continued assistance in areas of higher payment standards. To minimize any unintended negative budgetary impact, TGHA will closely analyze the market areas, the payment standards for each market area and the movement activity within the program. Adjustments will be made to this activity to assure that it does not result in decreasing the total number of families served due to increase in the per unit Housing Assistance costs.

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

Location/Site – The Alternate Payment Standards will to all Housing Choice Voucher participants.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 2.D

RENT REASONABLENESS THIRD PARTY REQUIREMENT

Narrative - Description of Proposed MTW Activity

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 similar 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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Expanding Housing Choice.

Cost Implications – There are no cost implications of this activity.

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

Location/Site – This activity will apply to all Housing Choice Voucher participants electing to rent a TGHA controlled unit.

ACTIVITY 3.B – ALTERNATE RE-CERTIFICATION SCHEDULE

Narrative - Description of Proposed MTW Activity

The Greenville Housing Authority will implement triennial recertifications for all households in the Housing Choice Voucher Programs.

Interim recertifications for decreases in income will be limited to only one per year when the household annual adjusted income decreases by more than 10%. Increases in income are not required to be reported and no interim recertification will generally not be conducted. The exception will be for households in which an adult member voluntarily leaves employment within 90 days prior to their scheduled triennial recertification and gains new employment within twelve months after their triennial recertification. Households will be expected to report the increase in earned income and an interim recertification will be performed.

In order 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 recertifications are scheduled evenly over the execution period.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Self-Sufficiency.

Cost Implications – This activity will result in reduced costs as staff time to conduct annual and interim recertifications will be significantly reduced.

Different Policy by Household Status/Family Types – This MTW activity will apply to all households and all family types in the Housing Choice Voucher Program.

Location/Site – This activity will apply to all Housing Choice Voucher participants.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 3.D – SELF-CERTIFICATION OF ASSETS

Narrative - Description of Proposed MTW Activity

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.

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

Cost Implications – This activity will allow for greater cost effectiveness in program operations through a reduction in staff time to process eligibility and recertifications. This activity will also provide cost benefit to assisted households who will no longer have to provide multiple third-party bank statements and other asset documentation.

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

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 4.A – VACANCY LOSS

Narrative - Description of Proposed MTW Activity

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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Expanding Housing Choice.

Cost Implications – The cost implication is budget neutral the cost of the vacancy payments are expected to be off-set by higher success rates resulting in increased utilization and thus, increased administrative fees.

Different Policy by Household Status/Family Types – This MTW activity will apply to household types that are new admissions and existing participants that move to another unit.

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 4.B – DAMAGE CLAIMS

NARRATIVE - DESCRIPTION OF PROPOSED MTW ACTIVITY

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.

Payment will be made to the landlord at the time of the first payment under the new HAP contract.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Expanding Housing Choice.

Cost Implications – The cost implication is budget neutral the cost of the damage claims is expected to be off-set by higher success rates resulting in increased utilization and thus, increased administrative fees.

Different Policy by Household Status/Family Types – This MTW activity will apply to household types that are new admissions and existing participants that move to another unit.

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 4.C – OTHER LANDLORD INCENTIVES

Narrative - Description of Proposed MTW Activity

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

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

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Expanding Housing Choice.

Cost Implications – The cost implication is budget neutral the cost of the incentive payment will be off-set by higher success rates resulting in increased utilization and thus, increased administrative fees.

Different Policy by Household Status/Family Types – This MTW activity will apply to household types that are new admissions and existing participants that move to another unit.

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 5.C – THIRD-PARTY REQUIREMENTS

Narrative - Description of Proposed MTW Activity

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.

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.

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

Cost Implications – This activity will result in reduced costs as TGHA will not have to contract with a third-party inspection company to conduct inspections.

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

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 5.D – ALTERNATE INSPECTION SCHEDULE

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.

In order 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.

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

Cost Implications – This activity will result in reduced costs as staff time to conduct annual inspections will be significantly reduced.

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

Location/Site – This activity will apply to all Housing Choice Voucher participants.

ACTIVITY 9.A, 9.B, 9C, 9F & 9.H – PROJECT BASED VOUCHERS
INCREASE PROGRAM AND PROPERTY CAPS
ELIMINATION OF PBV SELECTION PROCESS
LIMIT PORTABILITY FOR PBV UNITS

NARRATIVE - DESCRIPTION OF PROPOSED MTW ACTIVITY

The Greenville Housing Authority will develop and implement a local MTW Project Based Program that will include the activities listed below.

Increased Program Cap - 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.

Increase in Project Cap - 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.

Elimination of Selection Process - 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.

Increase PBV HAP Contract Length – 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.

Portability Limit - 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 request 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.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Cost Effectiveness and Expanding Housing Choice.

Cost Implications – This activity will result in reduced costs. Project Based Vouchers require fewer inspections; travel time for inspections is reduced when units are located in a single project; and the selection process to award Project Based Vouchers will be streamlined.

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

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

ACTIVITY 11.A AND 11.B – MTW SELF-SUFFICIENCY PROGRAM

Narrative - Description of Proposed MTW Activity

Participation in a self-sufficiency program shall be a condition of eligibility for new admissions and a condition participation in the Housing Choice Voucher Program.

Elderly and disabled individuals are automatically exempt from this activity. Other exemptions will be considered on a case-by-case basis.

All abled 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 self-sufficiency program and is held accountable for progress of all household members.

New Admissions households including port-ins from another jurisdiction will be provided six months from the date of the initial lease up in City and/or County of Greenville to become compliant with self-sufficiency requirements.

If a New Admission household is not compliant with self-sufficiency requirements prior to submission of a Request for Tenancy Approval, they must meet with an assigned Case Worker and develop a self-sufficiency plan. TGHA will not approve a RFTA until the household has developed a self-sufficiency plan and executed the self-sufficiency contract.

A financial incentive will be provided for households who remain fully compliant with the self-sufficiency program during an applicable calendar year. These households will earn \$2,000 if they remain fully compliant from January 1 through December 31 of each year.

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. All credits will be forfeited for any household that is terminated from the program for cause or ports to another jurisdiction for any reason.

In order to successfully complete the self-sufficiency plan, participants must meet the following criteria:

1. The household has obtained and maintains suitable employment. Suitable employment is defined as working 30 hours or more per week combined for all household members.
2. All members of the household have been independent of welfare for at least twelve consecutive months. Welfare is defined as assistance from federal or state welfare programs. It does not include social security, child support payments, Medicaid or similar benefits.
3. Activities listed on the self-sufficiency plan must be completed within the designated timeframe or approved extensions.
4. The household is in full compliance with their lease, including no monies owed for repayment agreements to TGHA or their landlord.

To assist in the client's successful completion of their self-sufficiency contract, Program Coordinators will assist the family in the development of their plan and assure that participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Self-Sufficiency.

Cost Implications – This activity will have no cost implications as it is anticipated that the fixed financial incentive payments would be equivalent to payments for escrow payments based on increased income.

Different Policy by Household Status/Family Types – This MTW activity will apply to all households and all family types participating in the FSS program.

Location/Site – This activity will apply to all non-elderly/non-disabled Housing Choice Voucher Program participants.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 12B – WORK REQUIREMENT

Narrative - Description of Proposed MTW Activity

Compliance with work requirements shall be a condition of new admission and continued participation in the Housing Choice Voucher Program. All able-bodied individuals between the ages of 18 and 61 must comply with a work requirement.

Elderly and disabled individuals are automatically exempt from this activity. Individuals who are the primary caretaker for dependents under age 6 or who are pregnant are also exempt from this activity. Other exemptions will be considered on a case-by-case basis under the hardship policy.

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 age 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 households including households porting from another jurisdiction must meet the work requirement prior to submission of a Request for Tenancy Approval. TGHA will not accept an RFTA from a household if they are not in compliance with work requirements.

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 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, 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. In these circumstances, a rent adjustment will be processed as applicable. Failure to secure new employment after a second 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 Case Manager.

Individuals who are self-employed including child care 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. . Copies of income tax forms filed with the IRS must be provided to claim self-employment; no other documentation shall be acceptable.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Self-Sufficiency.

Cost Implications – This activity will have no cost implications as it is anticipated that the fixed financial incentive payments would be equivalent to payments for escrow payments based on increased income.

Different Policy by Household Status/Family Types – This MTW activity will apply to all households and all family types participating in the FSS program.

Location/Site – This activity will apply to all non-elderly/non-disabled Housing Choice Voucher Program participants.

Hardship Policy – The Hardship Policy is attached as Exhibit A.

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

ACTIVITY 17.C – LOCAL NON-TRADITIONAL ACTIVITIES
HOUSING DEVELOPMENT PROGRAMS

Narrative - Description of Proposed MTW Activity

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.

The chart below identifies the projects TGHA expects to fund in the fiscal year.

Name of Project	MTW Role Acquisition Rehabilitation New Construction	Type of MTW Financing Gap LIHTC Other	Total Number Units	Total Number Affordable Units	Number of Units <80% AMI	Number of Units <50% AMI	Number of Units <30% AMI	Number of Units Affordable Other
Perry Avenue	New Construction	GAP	14	14	0	14	0	0
Arcadia Hills	New Construction	GAP	16	16	0	16	0	0

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Expanding Housing Choice.

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.

SAFE HARBOR WAIVER POLICIES

The Greenville Housing Authority is not seeking any waivers from the Safe Harbor provisions for any MTW activity.

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 3 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	<p>High</p> <p>To supplement EIV when EIV reported sources do not contain verification of the full retrospective period where applicable; or</p> <p>When tenant cannot produce written third-party verification documents.</p>
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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.

ACTIVITY E-2 – ALTERNATE HOMEOWNERSHIP PROGRAM

Narrative - Description of Proposed MTW Activity

This activity will waive provisions of the Housing Choice Voucher Homeownership Program, 24CFR Part 982, Subpart M, specifically 982.625 through 982.643. TGHA will develop and implement a local Homeownership Program utilizing its MTW flexibility and fungibility.

TGHA will provide homeownership assistance in the form secondary financing provided through a flat upfront payment for the difference between the purchase price of the home and the mortgage secured by the household not to exceed the maximum amount in the chart below.

The secondary financing will be secured by a non-interest-bearing note that will be forgiven at 10% per year that the family resides in the home purchased.

LOCAL HOMEOWNERSHIP PROGRAM	
MAXIMUM ASSISTANCE	
Total Household Income	Maximum Assistance
50% - 70% of AMI	\$40,000
71% - 80% of AMI	\$30,000
81% - 100% of AMI	\$20,000

The following criteria shall establish eligibility to participate in the Homeownership Program:

1. The family must have a demonstrated history of compliance with all Housing Choice Voucher Program regulations.
2. At least one adult member of the household must have a consistent employment history of a minimum of two years.
3. The total household income must be a minimum of \$25,000 annually.
4. The family must meet all underwriting criteria to secure a private mortgage.
5. The family must participate in pre- and post-purchase counseling.

MTW Statutory Objective – This MTW activity serves the following statutory objectives: Self-sufficiency.

Cost Implications – This activity will have cost implications to TGHA’s annual budget as we set aside funds to serve participants under this program. To minimize budget impact, TGHA will established a maximum number of homeowners to be accepted into the program each fiscal year, not to exceed 5. .

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

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

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
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 time 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 of time 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 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 and Work Requirement Hardship - A household may request a hardship exemption from the Self-Sufficiency and Work Requirements. 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 and work requirements.

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.

EXHIBIT B - IMPACT ANALYSIS
MOVING TO WORK SUPPLEMENT 2022-2023

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 – Tenant Rent Policies Agency Specific Waiver	1u. Tenant Standard Deductions
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 is expected to remain the same as some households will have greater deductions and other will have less.	
2. Affordability of Housing Costs for affected families.	
Housing costs may increase slightly for some households and decrease slightly for others. 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	
Standard deductions contribute towards both cost effectiveness and self-sufficiency. This activity will better prepare residents for private market housing in which rent is not tied to household income. It is expected to also reduce administrative costs as less staff time will be needed to verify and calculate deductions.	
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 a minimal number of hardship requests.	
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 this 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 at the triennial recertification. Families will be 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 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 – Reexaminations	11a and 11b – MTW Self-Sufficiency Program
1. Impact on TGHA Finances	
This activity is 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 will result in increased tenant earned income which will ultimately 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.	
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 as defined within this activity.	
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. 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 – Reexaminations	12b – Work Requirements
1. Impact on TGHA Finances	
This activity is expected to have a positive impact on finances. As earned income increases, the average HAP costs is expected to decrease resulting in additional revenue to support other MTW activities and/or provide additional affordable housing.	
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 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 engage in 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 – Tenant Rent Policies Agency Specific Waiver	E.1. Alternate Verification Hierarchy
1. Impact on TGHA Finances	
This activity is expected to reduce administrative costs slightly and thus, provide some additional revenue to support other MTW activities.	
2. Affordability of Housing Costs for affected families.	
This activity will not impact the affordability of housing costs for affected 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	
This activity is costs effective as it will reduce some costs in the overall administration of the program.	
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 not expected to impact 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.	