



2023 TGHA Moving To Work Supplement  
Revised – December 5, 2022  
Revised – January 10, 2023  
HUD Approved – January 10, 2023  
Amended – March 13, 2023  
HUD Approved – April 20, 2023

# 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 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.

## **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 2023 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 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**

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

### **IMPLEMENTATION PLAN**

Upon HUD approval of each MTW Activity, TGHA develops a detailed Implementation Plan which details all operational policies and procedures of the corresponding MTW Activity.

## **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 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.

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.

**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.

<b>Household Size</b>	<b>Standard Deduction</b>
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 75<sup>th</sup> 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 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.

**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 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.

**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 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. All other households and family types will recertify annually.

**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 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.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.

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 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.

**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 – MTW SELF-SUFFICIENCY PROGRAM**

## **ACTIVITY 12.B – WORK REQUIREMENT**

### **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.

Households that are currently enrolled in the TGHA traditional FSS program will be exempt from the mandatory MTW SS program if they remain in the FSS program. When a family is no longer enrolled in the FSS program, they will be required to participate in the MTW SS. The Head of House will develop a self-sufficiency plan and enter into a MTW SS Contract of Participation for a combined total of ten (10) years.

**MTW SS Work Requirement** – 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. Households currently enrolled in the traditional FSS program will be subject to the MTW SS Work Requirement as a condition of continued occupancy.

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.

TGHA will use the FSS Coordinator grant to assist families that are in compliance with MTW SS requirements but have not yet achieved sufficient self-sufficiency to exit the HCV Program. Focus will be primarily on assisting head of households in developing skills that will lead to higher paying employment opportunities.

**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.

For prior FSS families that have received a monetary escrow payout, the Financial Incentive will be capped at a combined \$13,000 for the two programs. For traditional FSS families that do not receive a monetary escrow payout due to a voluntary termination of

their FSS contract will be provided financial credit when FSS ITSP goals matching the MTW SS Financial Incentive table are verified upon MTW SS program entry.

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.

Category	Pay Point	Eligibility	Amount	Maximum
<b>EDUCATION &amp; TRAINING</b>	Completion of training/ Certification Program	one-time	\$ 500.00	\$500.00
	Completion of GED	one-time	\$ 300.00	\$300.00
	Completion of Associate Degree	one-time	\$ 500.00	\$500.00
	Completion of Bachelor Degree	one-time	\$ 1,000.00	\$1,000.00
	Completion of Masters or Doctorate Degree	one-time	\$ 1,500.00	\$1,500.00
<b>MAXIMUM EDUCATION EARNINGS</b>				<b>\$2,500.00</b>
<b>EMPLOYMENT</b>	Obtain New Employment	one-time	\$ 100.00	\$100.00
	Employment Retention for 12 Consecutive Months	Annually	\$ 100.00	\$1,000.00
<b>ENGAGEMENT</b>	Completion of Annual Progress Meeting	Annually	\$ 100.00	\$1,000.00
	Attend 1 TGHA Workshops or Goal Group	Annually	\$ 100.00	\$1,000.00
<b>FINANCIAL STABILITY</b>	Engage in Financial Education and Coaching Activities	3X Annually	\$50.00	\$1,500.00
	Improve credit score (100 pts +)	one-time	\$ 300.00	\$300.00
	Open and maintain a new checking or savings account (12 Consecutive Months)	one time	\$ 150.00	\$150.00
	Increase & maintain personal savings by at least \$200 (verifiable over 12 Month Period)	one time	\$ 1,000.00	\$ 1,000.00
	Increase Earned Income 3%	Annually	\$ 100.00	\$1,000.00
<b>HOUSING &amp; HOMEOWNERSHIP</b>	Engage in homeownership preparation Activities	2x	\$ 100.00	\$200.00
	Purchase a home	one time	\$ 2,000.00	\$2,000.00
<b>PERSONAL</b>	Completion of 5 Personal SMART goals established at admissions & Progress meeting	5x	\$ 250.00	\$1,250.00
	<b>MAXIMUM EARNINGS</b>			

In order to successfully complete the MTW SS Contract of Participation, participants must meet the following criteria:

1. The head of household has obtained suitable employment and met the minimum annual earned income for compliance. Suitable employment is defined as working full time for at least twelve (12) months.
2. All members of the household have been independent of welfare for at least

twelve (12) 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 Individual Training and Service Plan must be completed within the designated timeframe.
4. The household is in full compliance with the lease, including no monies owed for repayment agreements to TGHA or landlords.

**Case Coordination** – To assist in the client’s successful completion of their Contract of Participation, MTW SS Coordinators will assist the family in the development of an Individual Training and Services Plan and assure that MTW SS Program participants are linked to supportive services they need to achieve their economic self-sufficiency goals.

**Mandatory Job Retention Training** - 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.

**Dependent School Requirements** - School requirements for dependents ages 5 through 18 shall be eliminated as the school district will not provide documentation to TGHA regarding attendance. School attendance of a minor dependent will not have any impact on the continued assistance of the assisted household at any time now or in the future.

### **Two-Year Extension of the Ten (10)-Year MTW SS Program Limit**

Head of Households that receive an exemption/waiver from the MTW SS Program are qualified to receive a Two-Year Extension of the Ten (10)-Year MTW SS Program Limit. Eligible exemptions include the following:

1. Student Waiver  
Waivers are provided for full-time students in good standing seeking a degree, professional license, or certificate.
2. Medical Waiver  
In the event an individual cannot work due to medical reasons (i.e., injury, pregnancy, health concerns, temporary or permanent disability, etc.) a medical waiver will be granted to exempt individuals from the work requirement while in recovery.
3. Sole Care Giver Waiver  
A sole care giver waiver is granted in the event one cannot work due to providing full-time care for an elderly parent, disabled or sick child, or other similar circumstances.

**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 HCV 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 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.

**EXHIBIT A – HARDSHIP POLICY**  
**MOVING TO WORK SUPPLEMENT 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 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 and Work Requirement Hardships** - A household may request a hardship exemption from the Self-Sufficiency and/or Work Requirement. 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 requirement 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.

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

<b>IMPACT ANALYSIS</b>	
<b>MTW Activity – Tenant Rent Policies Agency Specific Waiver</b>	<b>1h. Tenant Payment Modified Percent of Income</b>
<b>1. Impact on TGHA Finances</b>	
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.	
<b>2. Affordability of Housing Costs for affected families.</b>	
Housing costs are expected to increase slightly for non-exempt households. However, the hardship policies in effect will minimize any extreme impact for families.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Utilization Rate in HCV</b>	
This activity will have no impact on the utilization rate in HCV.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
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.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
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.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
Elderly and disabled households are exempt from this activity	

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1u. Tenant Standard Deductions
<b>1. Impact on TGHA Finances</b>	
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.	
<b>2. Affordability of Housing Costs for affected families.</b>	
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.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Utilization Rate in HCV</b>	
This activity will have no impact on the utilization rate in HCV.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
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.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is expected to result in a minimal number of hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
Elderly and disabled households are exempt from this activity	



IMPACT ANALYSIS	
MTW Activity – Payment Standards and Rent Reasonableness	2a – Payment Standards
<b>1. Impact on TGHA Finances</b>	
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.	
<b>2. Affordability of Housing Costs for affected families.</b>	
This activity is not expected to impact the affordability of housing costs for voucher families.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
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.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
This activity will have a positive impact on the meeting the MTW goals as it will significantly expand housing choice for voucher holders.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is not expected to impact the rate of hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
This activity is not expected to impact any protected class and will have not disparate impact.	

<b>IMPACT ANALYSIS</b>	
<b>MTW Activity – Reexaminations</b>	<b>3a and 3b – Alternate Reexamination Schedule</b>
<b>1. Impact on TGHA Finances</b>	
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.	
<b>2. Affordability of Housing Costs for affected families.</b>	
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.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
This activity is not anticipated to impact occupancy or utilization rates.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
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.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity is not expected to impact the rate of hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
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
<b>1. Impact on TGHA Finances</b>	
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.	
<b>2. Affordability of Housing Costs for affected families.</b>	
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.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Occupancy Level in Public Housing and Utilization Rate in HCV</b>	
This activity is not anticipated to impact occupancy or utilization rates.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
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.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
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.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
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
<b>1. Impact on TGHA Finances</b>	
This activity is expected to reduce administrative costs slightly and thus, provide some additional revenue to support other MTW activities.	
<b>2. Affordability of Housing Costs for affected families.</b>	
This activity will not impact the affordability of housing costs for affected families.	
<b>3. Wait List</b>	
This activity will have no impact on the wait list.	
<b>4. Termination Rate</b>	
This activity is not anticipated to impact the termination and/or eviction rate.	
<b>5. Utilization Rate in HCV</b>	
This activity will have no impact on the utilization rate in HCV.	
<b>6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice</b>	
This activity is costs effective as it will reduce some costs in the overall administration of the program.	
<b>7. Impact on TGHA’s Ability to Meet MTW Statutory Goals</b>	
This activity is not anticipated to impact TGHA’s ability to meet statutory goals.	
<b>8. Impact on Rate of Hardship Requests</b>	
This activity not expected to impact hardship requests.	
<b>9. Impact on Protected Classes and Associated Disparate Impact</b>	
This activity is not expected to impact any protected class and will have not disparate impact.	