

PHA Name : The Greenville Housing Authority

PHA Code : SC004

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2026

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

TGHA's definition of Self-sufficiency is defined as independence, autonomy, self-reliance, freedom, self-dependence, self-support, self-subsistence, and resilience. Economic self-sufficiency is defined as having the sustainable skills necessary to maintain employment paying a "living wage." This wage would pay for the family's basic needs with limited use of government subsidies. TGHA's goal is to match housing-assisted families with a broad range of highly collaborative community services to assist FSS families in achieving self-sufficiency including economic self-sufficiency. TGHA will offer low-income families a broad range of services through partnering with the program partners, based on the family's chosen paths. These services will provide support, including skills, training, certifications for employment, offering better than minimum wage options, educational opportunities, again based on the families' goals, job training, counseling, and other forms of social service assistance so that families may achieve economic self-sufficiency. Referrals for health needs, mental health, drug, and alcohol addictions, relationship challenges with spouses, or children or other areas of support that will be made available to the household. MTW Success Paths will become mandatory for all non-exempt participants. Participants will select a success path which could include continued education, skills training, employment, or home ownership. TGHA will not select a success path for households. That decision is an election of the household based on their willingness to commit or not to commit to self-sufficiency activities which are designed to improve their educational, employment skills or career opportunities. TGHA will give participants one-time monetary incentives as they accomplish specific goals in each of the Success Paths.

Success Path 1: Families choosing this path will have 4 years of rental assistance.

Success Path 2: Families choosing this path will have 5-6 years of rental assistance but must complete a training/certification, obtain a GED, obtain an associate degree, obtain a bachelor's degree, or obtain a Masters/Doctorate Degree.

Success Path 3: Families choosing this path will have 7 years of rental assistance. For this path, families must obtain first time employment, retain employment for twelve consecutive months, improvement of credit score until at least 620, open and maintain a new checking or savings account, increase and maintain personal saving by at least \$200 within a 12-month period, increase earned income by 3%, or become an entrepreneur.

Success Path 4: Families choosing this path will have 10 years of rental and must engage in homeownership preparation activities or purchase a home but must go through Success Path 3 initially.

All families, despite which path they choose, must engage in financial education, coaching activities, complete annual progress meetings and attend one workshop or goal group. Families are encouraged to be working on multiple goals within the success paths. Success Paths 2-4 will participate in MTW FSS and are entitled to participate in the FSS Escrow program during program participation.

TGHA sponsored a series of informational meetings to discuss the proposed MTW program. Two hundred forty participants attended, with one hundred seventy-six signing up for an appointment to join the program once approved by HUD. A local foundation has committed \$100,000 toward MTW activities. United Way has committed Americorp support for the MTW program. An MOU was executed with USC Upstate; they will provide data tracking for the program. TGHA has implemented a Landlord Office hours program which permits ongoing engagement with landlords. Landlords have been invited to participate in or have their staff participate in HUD sponsored NSPIRE sessions. There has been a significant increase in the number of landlords offering to participate in the program.

In addition to the traditional PCC, TGHA has launched an MTW Committee, which includes partners, HCV and PBV participants and a TGHA commissioner. We are also developing a landlord committee. Our hope is that we are able to collect data, recommendations and have organic interactions. A presentation regarding the proposed program was made to the Greenville city manager and the Greenville city Council. The program concept is well supported by our community.

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

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

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

C. MTW Activities Plan that The Greenville Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>TGHA has elected a rent based on 32% of household income rather than the typical 30%. It is important to note this does not impact elderly or disabled participants. TGHA's goal is a slight reduction in HAP expense as a means of offsetting increased expenses resulting from additional household deductions.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Tenant-based vouchers and project-based vouchers.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>N/A</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p>

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

1.j. - Alternative Utility Allowance (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The Greenville Housing Authority utilized the 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 were based on the size of the voucher issued to the family regardless of the size of unit chosen. The utility allowance schedules were calculated using the average consumption and costs for all utility types. TGHA utilized 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 were updated to reflect current consumption and costs. TGHA did not include items in the utility schedule that were excluded under HUD regulations
Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased revenue
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. The MTW activity applied to specific tenant-based units and/or properties with project-based vouchers
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Please provide an explanation as to why the activity was discontinued or will be discontinued. TGHA never implemented.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Please describe the alternative method of calculating the utility allowances. Please explain how the method of calculating utility allowances is different from the standard method and what objective the MTW agency aims to achieve by using this alternative method. N/A

1.n. - Utility Reimbursements (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA will eliminate utility reimbursement payments in the HCV program when the utility allowance is greater than the total tenant payment.
Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Decreased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Tenant-based vouchers and project-based vouchers utilized by non-exempt participants are impacted by this activity.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. TGHA has fully implemented this initiative, and no utility reimbursements are being issued for non-elderly and disabled families. TGHA transitioned to Yardi software and included the changes to utility reimbursements.

1.u. - Standard Deductions (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The Greenville Housing Authority will eliminate all current dependent deductions, provide a single standard deduction for all non-exempt participants. The single standard deduction will replace the medical, elderly/disabled, and dependent allowances. The single standard deduction will be based on household size \$500 per person up to six household members. One Person \$500 Two Person \$1000 Three Persons \$1500 Four Persons \$2000 Five Persons \$2500 Six+ Persons \$3000
Which of the MTW statutory objectives does this MTW activity serve? Self-sufficiency

<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Tenant-based vouchers and project-based vouchers utilized by non-except participants are impacted by this activity.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The childcare deduction has been added in order to support client success.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>How much will the single standard deduction be in the Fiscal Year?</p> <p>\$500</p>

<p>2.a. - Payment Standards- Small Area Fair Market Rents (HCV)</p>

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

Adopt local MTW Payment Standards based on the Primary Real Estate Submarkets (PRESM's) within jurisdiction. 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.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households

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

We have experienced better outcomes with housing choice but have experienced higher rent costs.

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

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

Adopt local MTW Payment Standards based on the Primary Real Estate Submarkets (PRESM's) within jurisdiction. Set at 80%-150% of SAFMR.

2.d. - Rent Reasonableness – Third-Party Requirement (HCV)

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

TGHA is authorized to perform rent reasonableness determinations on units that TGHA owns, manages, and/or controls. TGHA shall establish and make available a quality assurance method to ensure impartiality. TGHA shall make available the method used to determine that rents charged by owners to voucher participants are reasonable when compared to similar unassisted units in the market area. At the Department's request, TGHA must obtain the services of a third-party entity to determine rent reasonableness for TGHA-owned units.

<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Other – another specifically defined target population or populations.</p>
<p>If Other Selected in Previous Question: Please describe this target population in the text box.</p> <p>Applies to all units TGHA owns, manages, and/or controls.</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Applies to all units TGHA owns, manages, and/or controls.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>The third-party market study has been done and has been updated.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload a description of the quality assurance method.</p> <p>Supervisor to review all determinations for TGHA controlled units. Will have worksheet all key criteria of comparable units.</p> <p>No document is attached.</p>
<p>Please explain or upload a description of the rent reasonableness determination method.</p> <p>TGHA's policies require the use of a third-party vendor for all rent reasonableness activities. Additionally, TGHA utilizes third-party market studies submitted to lenders for new PBV projects to be developed by TGHA. TGHA reviews existing PBV rents compared with Market Rates.</p> <p>No document is attached.</p>

3.b. - Alternative Reexamination Schedule for Households (HCV)

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

The Greenville Housing Authority will implement triennial recertifications for all households. To achieve the highest level of operational efficiency, TGHA will stagger the implementation of this activity. TGHA must allow at least one interim adjustment per year at the request of the household, if the household gross income has decreased 10% or more.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No

What is the recertification schedule?

Once every three years

How many interim recertifications per year may a household request?

2 or more

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

Households are required to report changes in income or family size within 30 days of the change. An interim adjustment will only be processed when gross income decreases more than \$200 per month or increases more than \$500 per month.

Interim adjustments will be processed for changes in household circumstances that result in increased standard deductions for childcare allowances, removal of household members that result in a decrease in household income and reduction of associated standard deductions.

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

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

The Greenville Housing Authority has implemented a self-certification process for all households at reexamination in the Housing Choice Voucher Programs of assets only up to \$50,000 (fifty thousand dollars).

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

We created certification documents and found efficiency in completing recertification appointments.

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

No

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

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

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

The Greenville Housing Authority provides a vacancy payment to landlords in Tenant Based Voucher Program when the next HAP contract is executed between the owner and TGHA. Payments made to the landlord must be equal to no more than one month of the contract rent. TGHA has updated its Administrative Plan to reflect the vacancy loss policy.

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

Housing choice

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

Increased expenditures

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

The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Owner education regarding vacancy loss payments has increased owner willingness to participate in the rental assistance program.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? One month's contract rent for vacancy loss.
How many payments were issued under this policy in the most recently completed PHA fiscal year? 1
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$903

4.b. - Damage Claims (HCV-Tenant-based Assistance)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA provides a damage claim up to 2 months contract rent minus the security deposit the owner should have collected. Landlords must submit evidence of notification to tenants in accordance with landlord/tenant laws. The copy of the notification and evidence of damage must be submitted with the damage claim request. Participants will be notified of damage claim payments to landlords and will be required to repay the PHA in order to have a future voucher issued. The payment will be made to the landlord when the next HAP contract is executed between the owner and TGHA. TGHA has updated its Administrative Plan to reflect the damage claim policy.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Owner education regarding damage claims has increased owner willingness to participate in the rental assistance

program.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?) To all units
What is the maximum payment that can be made to a landlord under this policy? The 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.
How many payments were issued under this policy in the most recently completed PHA fiscal year? 7
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year? \$16,789

4.c. - Other Landlord Incentives (HCV- Tenant-based Assistance)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The Greenville Housing Authority provides an incentive payment of up to one month's contract rent to new landlords for each new unit that has not previously participated in the Housing Choice Voucher Program. Additionally, units being added to the HCV program for the first time may qualify for an incentive up to one month's rent. Owners are expected to request the incentive during execution of the HAP contract, however TGHA will accept an owner request for up to six months beyond the HAP execution date. TGHA has developed an incentive form which is available on our website.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. Owner education regarding landlord incentives has increased owner willingness to participate in the rental assistance program.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

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

To all units

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

The incentive payment is equal to one month's contract rent and is paid when requested upon execution of a Housing Assistance Payments Contract, and up to six months after the execution of the HAP contract.

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

13

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

\$20,357

5.a. - Pre-Qualifying Unit Inspections (HCV)

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

TGHA will allow pre-qualifying unit inspections which have been conducted within 90-days of the participant occupying the unit. The participant must be able to request an interim inspection. HQS inspection standards must not be altered as found in 24 CFR 982.401.

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

Housing choice

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

Neutral (no cost implications)

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

The MTW activity applies to all assisted households

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

N/A

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

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

5.b. - Reasonable Penalty Payments for Landlords (HCV)

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

TGHA will establish a reasonable penalty fee for landlords who failed HQS inspections to encourage positive HQS inspection outcomes and to reduce costs associated with re-inspections. Examples may include a fee imposed at a failed second or third reinspection. This will be phased in after a landlord workshop and education regarding NSPIRE occurs. The fee is to be \$25 per failed reinspection and all fees collected will be used for eligible MTW activities. TGHA has included this activity in our Administrative Plan. HQS inspection standards must not be altered as found at 24 C.F.R.

982.401. All fees collected will be used for eligible MTW activities.

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

Cost effectiveness

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

Decreased expenditures

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

The MTW activity applies to all assisted households

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

N/A

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

No

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

The maximum penalty payment that can be made to a landlord under this policy is: The maximum penalty payment that can be charged to a landlord under this policy is \$25 per failed reinspection.

How many penalty payments were charged under this policy in the most recently completed PHA recent year?

0 penalty payments were charged under this policy in the most recently completed PHA fiscal year.

5.c. - Third-Party Requirement (HCV)

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

The Greenville Housing Authority will utilize the MTW flexibility to perform Housing Quality Standards (HQS) inspections on Project-Based and Tenant-Based Voucher units that are owned, controlled, or managed by TGHA or a related affiliate. TGHA shall establish and make available a quality assurance method to ensure an objective analysis. The participant or owner may request an interim inspection at any time. HQS inspection standards will not be altered as found at 24 C.F.R.

982.401. At the Department's request, TGHA will obtain the services of a third-party entity to conduct all HQS inspections.

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

Housing choice

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

Increased expenditures
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>TGHA continues to use a third-party to conduct HQS inspections.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Please explain or upload the description of the quality assurance method:</p> <p>Following will explain the quality assurance method TGHA utilizes a third-party to conduct quality-controlled inspections. Any inspections resulting in a HQS violation results in a scheduled re-inspection. Owners and participants are notified of abatements where indicated. When an abatement is initiated, the participant is contacted for voucher issuance. Landlords can cure abatements by requesting a third inspection. If the HQS violation is cured and the participant wishes to remain in the unit, TGHA will resume HAP payments minus any abatement applied. The third-party vendor will conduct QC inspections for 20% of all inspections.</p> <p>No document is attached.</p>

7.b. - Term-Limited Assistance (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>MTW Success Paths will become mandatory for all non-exempt participants. Participants will select a success path which could include continued education, skills training, employment, or home ownership. TGHA will not select a success path for households. That decision is an election of the household based on their willingness to commit or not to commit to self-sufficiency activities which are designed to improve their educational, employment skills or career opportunities. TGHA will give participants one-time monetary incentives as they accomplish specific goals in each of the Success Paths.</p> <p>Success Path 1: Families choosing this path will have 4 years of rental assistance. Success Path 2: Families choosing this path will have 5-6 years of rental assistance but must complete a training/certification, obtain a GED, obtain an associate degree, obtain a bachelor's degree, or obtain a Masters/Doctorate Degree. Success Path 3: Families choosing this path will have 7 years of rental assistance. For this path, families must obtain first time employment, retain employment for twelve consecutive months, improvement of credit score until at least 620, open and maintain a new checking or savings account, increase and maintain personal saving by at least \$200 within a 12-month period, increase earned income by 3%, or become an entrepreneur. Success Path 4: Families choosing this path will have 10 years of rental and must engage in homeownership preparation activities or purchase a home but must go through Success Path 3 initially.</p> <p>All families, despite which path they choose, must engage in financial education, coaching activities, complete annual progress meetings and attend one workshop or goal group. Families are encouraged to be working on multiple goals within the success paths. Success Paths 2-4 will participate in MTW FSS and are entitled to participate in the FSS Escrow program during program participation.</p> <p>If the participant tells us, I really don't want to go to school, I'm not so interested in working, my mother helps me, we will not force her/him to commit to school, job training, employment. They will elect Success Path 1. They will receive coaching at least twice per year, reminding them of their election and the remaining time. They may at any time elect to "change paths" which would then permit them additional time. For example, if the participant says, two years have gone by really fast, I don't think that I will be ready to graduate in 3 years, we will discuss options for enrollment in education, skills</p>

training or job readiness and employment, if they agree and comply their path will change. All participants in all paths can advance the path and the time during the course of participation. The successful transition of participants positioned to pay more of their rent or to graduate from the rental assistance programs will alleviate funding restraints that prevent the assistance needed by other households including the homeless.

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

Self-sufficiency

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

Increased revenue; Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

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

Tenant-based vouchers and project-based vouchers utilized by non-except participants are impacted by this activity.

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

N/A

Does this MTW activity require a hardship policy?

Provided Already

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

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

No
Does the term-limited assistance MTW activity exempt any type of household or individual other than the elderly or individuals with disabilities?
No
Please describe how the MTW agency supports households to prepare for the end of assistance. Through a 4-10 year goal and financial based Self-Sufficiency program and work requirement described in 12.b.
How many households are currently subject to this policy? 1,700

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA has no remaining public housing units. 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 without engaging in an initiative to improve, develop, or replace a public housing property or site. Such projects shall be subject to site selection requirements and subsidy layering approval. Subject to Notice PIH 2013-27 where applicable, or successor. Property must be owned by a single-asset entity of the agency, Notice PIH 2017-21.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA may attach and pay PBV assistance for shared housing units and/or manufactured housing. PBV units must comply with HQS. PBV units must comply deconcentration and desegregation requirements under 24 C.F.R. part 903. A subsidy layering review must be conducted. Shared housing units may not be owner occupied.

<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>N/A</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?</p> <p>24</p>
<p>How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?</p> <p>0</p>
<p>How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?</p> <p>6</p>
<p>How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?</p> <p>0</p>

<p>9.f. - Increase PBV HAP Contract Length (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>TGHA may increase the term length of a PBV HAP Contract. PBV HAP Contract length must not be shortened. PBV HAP Contract length must not be greater than 50 years, including any extensions. PBV HAP Contract is subject to appropriations and the ending of an agency's MTW authorization.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p>

N/A
Please provide an explanation as to why the activity was discontinued or will be discontinued. TGHA never implemented.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

9.h. - Limit Portability for PBV Units (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA is authorized to waive the requirement to provide a tenant-based voucher at 12 months when requested by a PBV household. Portability under this activity must not be restricted for more than 24 months. TGHA must have a clear and uniform policy in place to address how move requests are received and how they are approved/denied for PBV households. Participants must still retain the ability to request a tenant-based voucher for reasonable accommodation according to existing rules.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies to all assisted households
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Please provide an explanation as to why the activity was discontinued or will be discontinued. TGHA never implemented.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No

10.c.HCV - Alternative Family Selection Procedures (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative Participants who do not meet the exception definitions will be required to participate in Success Paths 2-4 up to and including graduation from the rental assistance programs. Each of these success paths will be coded as FSS on the 50058 and families must engage in financial education, coaching activities, complete annual progress meetings and attend one workshop or goal group. Success Path 2, with 5-6 years of rental assistance, requires families to complete a training/certification, obtain a GED, obtain an associate degree, obtain a bachelor's degree, or obtain a Masters/Doctorate Degree. Success Path 3, with 7 years rental assistance and FSS Escrow Account established, must obtain first time employment, retain employment for twelve consecutive months, improvement of credit score until at least 620, open and maintain a new checking or savings account, increase and maintain personal saving by at least \$200 within a 12-month period, increase earned income by 3%, or become an entrepreneur. Success Path 4, with 10 years of rental assistance, must engage in homeownership preparation activities or purchase a home. Families who are on Success Path 1 are not enrolled in MTW FSS.

Recruitment involves outreach to all eligible households, during which an introduction to MTW FSS will be provided. Participants will be informed of initial assessment processes and incentives. Initially participants will be added to the program as a result of their willingness to engage in self-sufficiency. A deeper and more intense outreach will occur with those participants who do not initially respond or comply with MTW FSS outreach efforts. Non FSS staff will be assigned to work with these households in determining barriers to participation and recommendations for partner engagement to resolve.

TGHA will review FSS Guidance. TGHA will execute a Contract of Participation, or other locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program. TGHA will have an up to date, approved FSS Action Plan in accordance with 24 CFR 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract. TGHA will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. TGHA will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act. If TGHA terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under TGHA's Grievance Procedure (24 CFR part 966, subpart B) or the HCV informal hearing process (24 CFR part 982.555). TGHA will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or HCV assistance.

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

Self-sufficiency

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

Increased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

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

Tenant-based vouchers and project-based vouchers utilized by non-except participants are impacted by this activity.

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

N/A

Does this MTW activity require a hardship policy?

No

No document is attached.

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

No

Does the MTW activity require an impact analysis?

No

No document is attached.

Please describe the purpose and goals of the alternative contract or locally developed agreement, and/or the MTW agency's motivation for developing its own contract or agreement.

After consultation with HUD FSS, it was determined that it is within the best interest for program administration to utilize an alternative contract for agreements. TGHA submitted a draft agreement many months ago, as well as an amended FSS action plan. The adjustments currently being made to HUD Form 50075-MTW will result in the need for an amended version of the FSS Action Plan. The agency will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act. Participants who do not meet the exception definitions will be required to participate in self-sufficiency activities up to and including graduation from the rental assistance programs. If TGHA terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's HCV informal hearing process. Recruitment involves outreach to all eligible households during which an introduction to MTW FSS will be provided. Participants will be informed of initial assessment processes and incentives. Initially participants will be added to the program as a result of their willingness to engage in self-sufficiency. A deeper and more intense outreach will occur with those participants who do not initially respond or comply with MTW FSS outreach efforts. Non FSS staff will be assigned to work with these households in determining barriers to participation and recommendations for partner engagement to resolve. TGHA will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or HCV assistance.

10.d.HCV - Modify or Eliminate the Contract of Participation (HCV)

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

We modified the contract of participation and are referring to it as a partnership agreement. Modifications to the Contract of Participation will permit consistency in explanations for participants and documents related to program. All families in Success Paths 2-4 will participate in the MTW FSS and are entitled to participate in the FSS Escrow program during program participation. In addition to the possibility of establishing an FSS Escrow account, families enrolled in MTW FSS will earn incentives upon completion of goals outlined on the uploaded document titled 'MTW Incentive Chart'.

TGHA will review FSS Guidance. TGHA will execute a FSS COP or locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program. TGHA will have an up to date, approved FSS Action Plan in accordance with 24 C.F.R. 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract. TGHA will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. TGHA will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act; 6) If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's HCV informal hearing process (24 C.F.R. part 982.555); and 7). TGHA will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or HCV assistance.

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

Self-sufficiency
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Increased expenditures
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Non-elderly, non-disabled families
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Tenant-based vouchers and project-based vouchers utilized by non-except participants are impacted by this activity.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. N/A
Does this MTW activity require a hardship policy? No No document is attached.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Does the MTW activity require an impact analysis? No No document is attached.

10.e.HCV - Policies for Addressing Increases in Family Income (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The Greenville Housing Authority requires households to report changes in income as they occur. Only changes resulting

in increases of \$500 per month or more of gross income will result in an interim recertification. This policy offers encouragement for households to increase income without fear of increases in their portion of rent. Additionally, it reduces the amount of staff time spent on interim recertifications which can be redirected to supporting families in achieving their self-sufficiently goals.

TGHA agency goals for the FY include improving support to participants in achieving self-sufficiency. We also are focused on efficiencies in administering the HCV/PBV programs as a result of MTW. TTGHA will review FSS Guidance. TGHA will execute a FSS COP or locally developed agreement, that is at least five years but not more than ten years, with each participant participating in their FSS program. TGHA will have an up to date, approved FSS Action Plan in accordance with 24 C.F.R. 984.201 that incorporates all modifications to the FSS program approved under the MTW Contract. TGHA will not require MTW FSS Program participation as a condition for housing subsidy for elderly and disabled families. TGHA will not make MTW FSS Program participation mandatory for individuals that do not meet the definition of an eligible family at section 23(n)(3) of the 1937 Act, and those exempted from the Community Service Requirement under section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act; 6) If an agency terminates the housing subsidy or tenancy of a family for alleged violation of mandatory MTW FSS Program participation, the family will be entitled to a hearing under the agency's HCV informal hearing process (24 C.F.R. part 982.555); and 7). TGHA will not use income increases during participation in the MTW FSS Program to change a family's eligibility status for purposes of participation in the MTW FSS Program or HCV

assistance.

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

Cost effectiveness; Self-sufficiency

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

Decreased expenditures

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

The MTW activity applies only to a subset or subsets of assisted households

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

New admissions and currently assisted households

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

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families

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

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

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

Tenant-based vouchers and project-based vouchers occupied by eligible households.

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

N/A

Does this MTW activity require a hardship policy?

<p>No</p> <p>No document is attached.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>No</p> <p>No document is attached.</p>
<p>How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?</p> <p>Households are required to report changes in income as they occur. Only changes resulting in increases of \$500 per month or more will result in an interim recertification.</p>

<p>12.b. - Work Requirement (HCV)</p>
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Work requirements shall be defined as employment for a maximum of 30 hours total per week per household. 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.</p> <p>TGHA seeks to support participants in first time or improve employment. This will impact the fiscal position of the HCV/PBV programs and will provide a cushion in the event of fiscal year funding reductions. Those individuals exempt from the Community Service Requirement in accordance with Section 12(c)(2)(A), (B), (D) and (E) of the 1937 Act will be exempt from TGHA work requirement. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance. Individuals who are the primary caretaker for a child under 6 years of age or who are pregnant must also be exempt from the agency's work requirement. Supportive services shall be provided, either through the agency or a partner organization, to assist families in obtaining employment or an acceptable substitute, as defined by the MTW agency's policy. Work requirements shall not be applied to exclude, or have the effect of excluding, the admission of or participation by persons with disabilities or elderly individuals, or families that include persons with disabilities or elderly individuals. The hardship policy in the Administrative Plan must apply to families who are actively trying to comply with the agency's work requirement but are having difficulties obtaining work or an acceptable substitute.</p> <p>The Administrative Plan must also describe the consequences of failure to comply with the work requirement.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>

<p>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>New admissions and currently assisted households</p>
<p>Does the MTW activity apply to all family types or only to selected family types?</p> <p>The MTW activity applies only to selected family types</p>
<p>Please select the family types subject to this MTW activity.</p> <p>Non-elderly, non-disabled families</p>
<p>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers</p>
<p>Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity.</p> <p>Tenant-based vouchers and project-based vouchers utilized by non-except participants are impacted by this activity.</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Although this was an improved activity TGHA delayed implementation pending final approval of the 2025 Supplement. Prior to implementation, all residents shall be given notice six months in advance of the sanction policy for non-compliance.</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Provided Already</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>No</p>
<p>Does the work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?</p> <p>No</p>
<p>What counts as "work" under this the work requirement MTW activity?</p> <p>30 hours total per week per household or enrollment on a full-time basis in education offering a degree or certificate.</p>
<p>How will the MTW agency monitor compliance with the work requirement MTW activity?</p> <p>Compliance will be monitored through annual or bi-annual check ins with Coordinators. During these meetings coordinators will work with household members to determine their level of employment to provide coaching and referrals when required. incentives will be provided for families who continue to meet milestones. Various activities including graduations and celebrations of employment will be scheduled.</p>

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

TGHA has executed memorandum of understanding with various partners which outline services to be provided and described eligibility or pre-requisites. During One-on-One meetings with Self-Sufficiency Coordinators referrals are made to appropriate partners based on the family's needs. Reports of participant success are provided by partners. Partner agencies offered to households to comply with the work requirement are: TalentRise GVL (Greenville Chamber), Greenville Technical College-Continuing Education, SC works, United Way, United Ministries and Goodwill.

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

Households will receive education and coaching for up to 4 years. Those households which elect not to participate with self sufficiency plans will be limited to 4 years of rental assistance. Non-compliance results in graduation from the rental assistance program. Ongoing financial incentives are offered to all participants as they achieve milestones. THGA has received an award of \$250,000 from a local foundation. These funds are available for use in supporting incentives and other program activities. The term of rental assistance is increased as household continue to improve self sufficiency and gain or maintain employment, up to 10 years.

How many households are currently subject to the policy?

1,700

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

0

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

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$541,848	\$402,919	\$138,929	2029-09-30
2022	\$606,045	\$451,916	\$154,129	2030-09-30
2023	\$608,136	\$279,404	\$328,732	2031-09-30

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

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

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency?</p> <p>Yes</p>	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

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

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
<p>To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.</p>	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 Person	
3 Person	
4 Person	
5 Person	
6+ Person	
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	
No additional public hearing was held for an Agency-Specific Waiver and/or Safe Harbor waiver	

I.	Evaluations.
Yes - This table lists evaluations of The Greenville Housing Authority's MTW activities, including the names of evaluators and available reports	

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
MTW Expansion Statutory Requirements 2023	MTW Program Director, Office of Public Housing Investments	2023	MTW Statutory Requirements - Compliance Determinations STS compliance workbook

HARDSHIP POLICY MOVING TO WORK SUPPLEMENT 2026

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
1.h. Tenant Payment Modified Percent of Income
1.u. Standard Deductions
2.a. Payment Standards – Small Area Fair Market Rents
3.b. Alternative Reexamination Schedule for Households
7.b. Term-Limited Assistance
10.c. Alternative Family Selection Procedures
10.d. Modify or Eliminate the Contract of Participation
10.e. Policies for Addressing Increases in Family Income
12.b. Work Requirements

MTW senior staff will be responsible for the review and approval, or denial of all hardship requests received under this policy. Participants will have the right to informal hearing with accordance with TGHA Administrative Plan.

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.

- Families can request a hardship for the following situations: When the family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance; the family has experienced an increase in expenses, because of changed circumstances, for medical costs, childcare, transportation, education, or similar items.
- There may be circumstances or situations that may impact an individual family not expressly identified in this policy. MTW staff will take into consideration any requests by any household that deems it necessary to request a hardship exemption.
- When a household is approved for a temporary hardship, they will be notified of the expiration date of the hardship and their right to request an extension.
- MTW will recognize any hardship associated with VAWA at any time during participation in the program.
- TGHA will recognize hardships associated with pending disability claims.

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. Email communication is acceptable.
- 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
Payment Standards – Small Area Fair Market Rents

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 MTW senior staff.

MTW senior staff 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.

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1.h. Tenant Payment Modified Percent of Income
1. Impact on TGHA Finances	
This activity, which applies a 2% increase in rent contributions for non-exempt households, is anticipated to have a minimal impact of Housing Assistance Payments (HAP) expenditures. After implementation, HAP expenditures declined by 1%. Concurrently, there was a 9% increase in the total tenant payment. However, there was a decrease in payment standard to 95% from 110%.	
2. Affordability of Housing Costs for affected families.	
Housing costs are expected to increase based on the Greenville market. TGHA has reduced its payment standards as recommended in the 2025 HUD Get Ready Notice.	
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 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	
Hardship requests that result from individual household circumstances will be reviewed and approved where applicable. It is not anticipated that this process will trigger hardship requests.	
9. Impact on Protected Classes and Associated Disparate Impact	
TGHA will monitor impact on protected classes and disparate impact by monitoring request for hardship adjustments and by conduction periodic surveys.	

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1.u. Standard Deductions
1. Impact on TGHA Finances	
Deductions are proposed to be calculated at \$500 per household member for up to 6 members. This provides a greater benefit MTW participant when compared to current deduction which allow for \$480 deductions for minors who are 18 years or younger. The standard deduction actually serves as an incentive for MTW participants. A comparison of families from 2024 to 2025 resulted in an increase of 55% deductions.	
2. Affordability of Housing Costs for affected families.	
Housing costs will generally increase as a result of standard deductions.	
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 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 will permit households to have more control over household income as contributions toward rent are actually decreased. MTW/FSS requirements include financial literacy, budgeting, and financial planning provided by partners. It is anticipated that participants will learn how to best apply the saving afforded through this initiative.	
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 result in any hardship requests.	
9. Impact on Protected Classes and Associated Disparate Impact	
There will be no impact on protected classes and no disparate impact.	

IMPACT ANALYSIS	
MTW Activity – Payment Standards and Rent Reasonableness	2.a. – Payment Standards – Small Area Fair Market Rents
1. Impact on TGHA Finances	
TGHA has adjusted its payment standards to 95% of the HUD-published Fair Market Rents (FMR). This decision resulted from uncertainties surrounding HCV funding. TGHA is also utilizing Small Area Fair Market Rents (SAFMRs) to better reflect localized rental markets. The average per unit cost has decreased by 1% compared to the previous year.	
2. Affordability of Housing Costs for affected families.	
It is anticipated that funding cuts which impacted TGHA's payment standard decisions may impact affordability. This is not the result of a MTW activity.	
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 rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
TGHA does not have Public Housing. The HCV utilization rate exceeds 100% consistently. It is not anticipated that this will change.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
MTW participants education will include explanations about HCV funding which in turn will impact customer understanding about the need for self-sufficiency.	
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	
Payment standards are not a result of a MTW activity and therefore not create a hardship requests.	
9. Impact on Protected Classes and Associated Disparate Impact	
Any impact to protected classes or disparate impact are a result of HCV funding and not MTW activity.	

IMPACT ANALYSIS	
MTW Activity – Reexaminations	3.b. – Alternate Reexamination Schedule
1. Impact on TGHA Finances	
This activity is expected to have a decrease in program administrative costs and ultimately result in lower staffing levels in the HCV department. However, HCV staff will be repositioned to provide self-sufficiency services to MTW participants. TGHA has implemented the tri-annual reexaminations starting February 2025. One third of every month's reexaminations take place in 2025, one third in 2026, and one third in 2027	
2. Affordability of Housing Costs for affected families.	
This activity will not impact affordability 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 rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is not anticipated to impact utilization rates.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on meeting the MTW goals as staff will meet with participants in alternate years with a focus on participant self-sufficiency and partner engagement.	
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	7.b. – Term-Limited Assistance
1. Impact on TGHA Finances	
Though this activity has been implemented, no term limits have been reached. However, this activity will ultimately result in lower staffing levels in the HCV department and HCV staff will be repositioned to provide self-sufficiency services to MTW participants.	
2. Affordability of Housing Costs for affected families.	
This activity will not impact affordability for families.	
3. Wait List	
This activity will have an impact on the wait list because families will receive time limited assistance based on the Success Path they choose.	
4. Termination Rate	
This activity is anticipated to impact the termination rate.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is anticipated to impact utilization rates at year four. Currently, families stay on the HCV program an average of 9 years.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity will have a positive impact on meeting the MTW goals as staff will meet with participants in alternate years with a focus on participant self-sufficiency and partner engagement.	
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 not have disparate impact.	

IMPACT ANALYSIS

MTW Activity – Self-Sufficiency Program & Work Requirement

12.b. – Work Requirement

1. Impact on TGHA Finances

TGHA has completed assessments of nearly 500 households and began recording activity related to employment. Currently 193 families have enrolled in one of the four Success Paths.

MTW/FSS Enrollments as of July 2025

MTW FSS MONTHLY REPORT	
Traditional FSS enrolled in MTW FSS	7
Enrolled During November 2024	29
Enrolled in December 2024	53
Enrolled in January 2025	29
Enrolled February 2025	27
Enrolled March 2025	19
Enrolled April 2025	9
Enrolled May 2025	9
Enrolled June 2025	1
Enrolled July 2025	10
Total MTW FSS Enrolled Families	193
Participant Progress	
# employed FT (1st time since enrollment)	15
# pursuing GED	24
# pursuing job placement	22
# pursuing Entrepreneurship	12
# pursuing professional certification	11
# pursuing an Associates Degree	7
# pursuing Bachelors	3
# pursuing Masters	1
# pursuing Credit Repair/ Counseling	32
# pursuing Financial Stability/ Savings	21
# actively pursuing Homeownership	1
Total # actively pursuing success path goals	149
Incentives	
Initial Incentives Paid	\$9,650.00
Incentives Paid for Completed Success Path goals	\$10,400.00
Total Incentives Paid	\$20,050.00

2. Affordability of Housing Costs for affected families.
This activity will have no impact.
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 rate.
5. Occupancy Level in Public Housing and Utilization Rate in HCV
This activity is not anticipated to impact utilization rates.
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice
This activity will ultimately have a positive impact on the MTW cost effectiveness as HAP decreases are realized. Additionally, participants achieving employment and increase in income will have the opportunity to increase general life experiences including self-sufficiency. Housing opportunities may also increase as a result of participants' increase of 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
It is anticipated that there will be hardship requests which will result from individual household circumstances.
9. Impact on Protected Classes and Associated Disparate Impact
This activity is not expected to impact any protected class and will not have disparate impact.