

PHA Name : THE GREENVILLE HOUSING AUTHORITY

PHA Code : SC004

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 1/1/2027

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

Draft

B. MTW Supplement Narrative.

TGHA received its Moving to Work (MTW) designation under Cohort #3, Landlord Incentives, in 2022. Since that time, TGHA has developed and implemented a modified Family Self-Sufficiency (FSS) program known as the Success Paths Program. The Success Paths Program serves as TGHA's MTW self-sufficiency model. It expands upon the traditional FSS framework by integrating mandatory participation requirements, work expectations, milestone-based incentives, time-limited assistance, financial capability services, and individualized pathways to economic mobility.

TGHA defines self-sufficiency as independence, autonomy, self-reliance, freedom, self-support, and resilience. Economic self-sufficiency is defined as possessing the education, skills, employment, and financial stability necessary to earn a living wage and meet basic household needs with reduced reliance on government assistance. The Success Paths Program was created to help families achieve these outcomes through structured goal setting, coaching, supportive services, incentives, and accountability measures.

Under the Success Paths Program, all non-exempt households are required to participate in self-sufficiency activities as a condition of continued assistance. The program incorporates a work requirement that applies to all non-exempt, work-capable adult household members between the ages of 18 and 61. Participants must maintain at least 30 hours per week of employment, participate in a certified job training or workforce development program, or maintain full-time student status. The head of household is responsible for developing and maintaining a household self-sufficiency plan that identifies goals and objectives for all household members subject to the requirement.

TGHA recognizes that some participants may experience barriers to employment or participation. Households may request a hardship exemption by providing a signed participant statement and verification from a qualified provider documenting the inability to comply with the work requirement. Temporary exemptions are generally granted for 90-day periods and are reviewed every 90 days unless documentation supports a permanent exemption due to a chronic condition or long-term disability.

Through the Success Paths Program, TGHA partners with local nonprofit organizations, educational institutions, workforce development agencies, employers, and service providers to offer a broad range of services that support economic mobility. These services include education and training opportunities, industry-recognized certifications, job readiness and workforce development programs, financial education, career coaching, counseling, entrepreneurship support, homeownership preparation, and referrals for health, behavioral health, substance use, and family support services.

All non-exempt participants are required to select and enroll in a Success Path. TGHA does not assign participants to a specific path; instead, households select the pathway that best aligns with their goals and willingness to engage in self-sufficiency activities. Participants who fail to enroll, refuse to select a Success Path, or remain non-compliant after outreach, orientation, enrollment opportunities, and corrective action efforts will be given 90 days to achieve compliance. Continued non-compliance may result in termination of housing assistance. Likewise, participants who become unemployed after previously meeting the work requirement are provided with 90 days to regain compliance before assistance may be terminated.

The Success Paths Program includes four pathways that connect participant achievements to the length of housing assistance available:

Success Path 1 provides up to four years of rental assistance. It is intended for participants who choose to meet only the minimum program requirements and do not pursue additional self-sufficiency goals.

Success Path 2 provides up to six years of rental assistance. It requires participants to complete an educational or workforce credentialing goal, such as obtaining a GED or high school diploma, earning a training certification, or completing a college degree.

Success Path 3 provides up to seven years of rental assistance and focuses on employment and financial capability outcomes. Participants must achieve goals such as obtaining and maintaining employment, improving credit, establishing banking relationships, increasing savings, increasing earned income, or becoming self-employed. Participants in this path are eligible for an FSS Escrow Account.

Success Path 4 provides up to ten years of rental or mortgage assistance and is designed for households pursuing homeownership. Participants must successfully progress through Success Path 3 and demonstrate employment stability, savings practices, and homeownership readiness before purchasing a home or transitioning to homeownership assistance.

Regardless of the Success Path selected, all participating households must complete financial education activities, participate in coaching sessions, attend annual progress meetings, and engage in at least one workshop or goal-focused group annually. Participants are encouraged to pursue multiple goals simultaneously to accelerate their progress toward

economic independence.

Success Paths 2, 3, and 4 constitute TGHA's modified MTW FSS program. Participants enrolled in these pathways are reported as MTW FSS participants and are eligible to participate in the FSS Escrow Program. TGHA also provides one-time milestone incentives for the achievement of approved educational, employment, financial capability, and homeownership goals. To support these activities, a local foundation has committed approximately \$230,000 in funding for participant incentives and program activities. During 2026, TGHA distributed more than \$109,000 in incentive payments to participants achieving self-sufficiency milestones.

To evaluate outcomes and support continuous improvement, TGHA executed a Memorandum of Understanding with the University of South Carolina Upstate to provide program data collection, analysis, and evaluation services through 2028.

The Success Paths Program is part of TGHA's broader MTW strategy to promote economic mobility while strengthening landlord participation and program effectiveness. In addition to maintaining a traditional Program Coordinating Committee, TGHA established a Success Paths Program Committee consisting of participants, community partners, agency staff, and a TGHA commissioner. TGHA is also developing a dedicated landlord advisory committee to support stakeholder engagement and provide recommendations regarding program operations and outcomes.

Since its implementation in 2024, the Success Paths Program has been positively received by participants, community partners, and stakeholders. Through its modified MTW FSS framework, TGHA seeks to create clear pathways to employment, financial stability, and homeownership while encouraging greater participant accountability and long-term economic self-sufficiency.

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)	Plan to Implement in the Submission Year
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Currently Implementing
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Was Discontinued in a previous 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)	Will be Discontinued in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Not Currently Implemented
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Currently Implementing
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Not Currently Implemented
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	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)	Currently Implementing
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)	Currently Implementing
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)	Currently Implementing
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)	Was Discontinued in a previous Submission Year
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Was Discontinued in a previous 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)	Currently Implementing
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Currently Implementing
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Currently Implementing
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.f. - Minimum Rent (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 minimum tenant rent of \$125 per month for non-exempt Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) households. Households subject to this activity will pay the greater of the minimum rent or the tenant rent calculated under TGHA's MTW rent policies, including Activity 1.h. Total Tenant Payment as a Percentage of Gross Income. Elderly and disabled households are exempt from this activity. The purpose of the minimum rent is to encourage participant responsibility for housing costs, support employment and self-sufficiency goals, simplify rent administration for very low-income working households, and promote consistency with TGHA's Success Paths Program. Revenue generated through participant contributions helps support the long-term sustainability of housing assistance while complementing TGHA's broader economic mobility initiatives, including financial capability services, employment supports, participant incentives, and Family Self-Sufficiency (FSS) activities.
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 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 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 non-exempt households participating in the Success Paths Program and subject to TGHA's MTW self-sufficiency requirements are impacted by this activity. Elderly and disabled households are excluded.
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? Yes This document is attached.
Does the hardship policy apply to more than this MTW activity?

Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.) 1.f. - Minimum Rent (HCV); 1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV); 2.a. - Payment Standards- Small Area Fair Market Rents (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
How much is the minimum rent or minimum Total Tenant Payment (TTP)? \$125.00

1.h. - Total Tenant Payment as a Percentage of Gross Income (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative 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.
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.
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? Yes This document is attached.
Does the hardship policy apply to more than this MTW activity? Yes
Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.) 1.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
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.

The childcare deduction has been added in order to support client success.

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

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

\$500

2.a. - Payment Standards- Small Area Fair Market Rents (HCV)

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

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.

N/A

Please provide an explanation as to why the activity was discontinued or will be discontinued. TGHA never implemented.
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? No No document is attached.
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.
Which of the MTW statutory objectives does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today. Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies only to a subset or subsets of assisted households
Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? New admissions and currently assisted households
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies only to selected family types
Please select the family types subject to this MTW activity. Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box. Applies to all units TGHA owns, manages, and/or controls.
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? The MTW activity applies to specific tenant-based units and/or properties with project-based vouchers
Please describe which tenant-based units and/or properties with project-based vouchers participate in the MTW activity. Applies to all units TGHA owns, manages, and/or controls.
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. The third-party market study has been done and has been updated.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described? No
Please explain or upload a description of the quality assurance method. Supervisor to review all determinations for TGHA controlled units. Will have worksheet all key criteria of comparable units. No document is attached.
Please explain or upload a description of the rent reasonableness determination method. 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. No document is attached.

3.b. - Alternative Reexamination Schedule for Households (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative The Greenville Housing Authority has implemented triennial recertifications for all eligible households. To achieve the highest level of operational efficiency, 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. Success Paths coaching sessions, annual progress meetings, and work requirement reviews do not constitute income reexaminations.
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. To receive a vacancy payment, the landlord must submit a vacancy claim and lease the unit to a new HCV participant within 120 days of the beginning of the vacancy period. 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

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.

TGHA continues to use a third-party to conduct HQS inspections.

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

No

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

Following will explain the quality assurance method
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.

No document is attached.

7.b. - Term-Limited Assistance (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 MTW Success Paths Program is designed to promote economic mobility, self-sufficiency, and long-term housing stability by requiring all non-exempt households to actively engage in goals that support educational advancement, workforce development, increased earnings, financial capability, or homeownership. Through this activity, participants will select a Success Path that aligns with their personal goals and level of commitment to self-sufficiency activities. TGHA will not assign a Success Path; rather, each household will make an informed election regarding its future participation in assisted housing and the actions it is willing to undertake to maintain that assistance.

Participation in a Success Path and compliance with the associated requirements are conditions of continued housing assistance. Households that choose not to select a Success Path, decline to participate in required activities, or fail to comply with the obligations associated with their elected path are effectively choosing to end their participation in the housing assistance program and will be subject to termination of assistance. TGHA will provide coaching, support, and opportunities for re-engagement; however, continued assistance requires participant commitment and compliance with program expectations.

To encourage progress toward self-sufficiency, TGHA will provide one-time monetary incentives when participants achieve specific milestones associated with their elected Success Path.

Success Path 1: Participants electing this path will receive up to four years of rental assistance. This option is intended for households that do not wish to pursue education, employment, training, or homeownership goals beyond the program's minimum requirements. Participants choosing this path acknowledge that assistance is time-limited and that failure to progress to another Success Path may result in the end of assistance at the conclusion of the four-year period.

Success Path 2: Participants electing this path may receive five to six years of rental assistance and must achieve one or more educational or workforce development milestones, including completing a training or certification program, obtaining a GED, earning an associate degree, bachelor's degree, or graduate degree.

Success Path 3: Participants electing this path may receive up to seven years of rental assistance and must achieve economic mobility goals such as obtaining employment, maintaining employment for twelve consecutive months, increasing earned income, improving credit to a score of at least 620, establishing and maintaining financial accounts and savings, or becoming self-employed.

Success Path 4: Participants electing this path may receive up to ten years of rental assistance and must pursue homeownership preparation activities or purchase a home. Participants must first satisfy the requirements of Success Path 3 before advancing to this path.

Regardless of the Success Path selected, all participating households must complete financial education and coaching activities, attend annual progress meetings, and participate in at least one workshop or goal group each year. Participants are encouraged to pursue multiple goals simultaneously to accelerate their progress toward self-sufficiency. Households enrolled in Success Paths 2 through 4 will participate in the MTW Family Self-Sufficiency (FSS) program and may receive the benefits of the FSS Escrow Program while actively participating and remaining compliant.

Households retain the flexibility to move to a different Success Path during participation. For example, a participant who initially elects Success Path 1 may later decide to pursue education, employment, or training goals and transition to a higher Success Path, thereby extending the period of assistance available to support achievement of those goals. Through ongoing coaching and periodic progress reviews, TGHA will help participants understand their options, the consequences of their choices, and the remaining time available under their elected path.

The overall goal of the MTW Success Paths initiative is to encourage participant investment in education, employment, financial capability, and homeownership while ensuring that limited housing assistance resources are directed toward households actively working toward greater self-sufficiency. As households increase their ability to contribute toward housing costs or successfully transition from rental assistance, program resources can be made available to serve

additional eligible families and individuals in need, including those experiencing homelessness.

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.

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
How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year? 5
How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year? 0
How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year? 5
How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year? 0

9.f. - Increase PBV HAP Contract Length (HCV)
Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative TGHA 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.
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

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**

TGHA is implementing an alternative family selection and enrollment process for its MTW Family Self-Sufficiency (MTW FSS) Success Paths program. Under this activity, participation in MTW FSS and enrollment in Success Paths 2, 3, or 4 will be mandatory for all non-exempt households. Rather than selecting participants based solely on voluntary interest in self-sufficiency services, TGHA will proactively identify all households that meet the eligibility criteria and require their enrollment in the program as a condition of continued participation in housing assistance.

Under the alternative family selection procedure, TGHA will review all assisted households to determine whether they meet any applicable exemption criteria. Households that do not qualify for an exemption will be selected for mandatory enrollment into the MTW FSS Success Paths program. Newly admitted households that are subject to the requirement must complete the enrollment process and select a Success Path within 120 days of admission. Existing assisted households that are subject to the requirement will be required to attend a Success Paths orientation and complete enrollment, including the selection of a Success Path, within 60 days of orientation.

As part of the enrollment process, TGHA will conduct outreach to all required households to explain program requirements, available Success Paths, incentives, and expectations. Participants will complete an initial assessment to identify goals, barriers, strengths, and service needs. Families will then execute a Contract of Participation or locally developed Partnership Agreement and select one of the required Success Paths based on their self-sufficiency goals. Success Paths 2, 3, and 4 will be reported as FSS participation on the HUD Form 50058. Success Path 1 will not be reported as FSS, but will still be required to participate in financial education, coaching activities, annual progress meetings, and at least one workshop or goal group each year.

Participants enrolled in Success Paths 2 through 4 will be required to engage in financial education, coaching activities, annual progress meetings, and at least one workshop or goal group each year. Success Path requirements include:

- Success Path 2 (Up to 6 years of assistance): Completion of a training or certification program, GED, associate degree, bachelor's degree, or graduate degree.
- Success Path 3 (Up to 7 years of assistance and FSS escrow eligibility): Achievement of one or more economic mobility goals, including obtaining employment, maintaining employment for twelve consecutive months, improving credit to at least 620, establishing banking relationships, increasing savings, increasing earned income, or becoming self-employed.
- Success Path 4 (Up to 10 years of assistance): Engagement in homeownership preparation activities or the purchase of a home.

Families participating in Success Paths 2 through 4 will be eligible to participate in the FSS Escrow Program in accordance with MTW requirements and TGHA policies. Families in Success Path 1 are not enrolled in FSS, are allotted up to 4 years of housing assistance, and are not eligible for FSS escrow.

To maximize participation and successful engagement, TGHA will utilize enhanced outreach and case management strategies. Households that do not initially respond to enrollment efforts or fail to engage in required activities will receive additional outreach and barrier assessments. Community partners and non-FSS staff may be assigned to work with these households to identify obstacles to participation and connect them with supportive services designed to improve engagement and compliance.

TGHA will maintain an approved FSS Action Plan consistent with 24 CFR 984.201 and will execute a Contract of Participation or Partnership Agreement with each participating household for a term of not less than five years and not more than ten years. Participation will not be mandatory for elderly or disabled households, families that do not meet the statutory definition of an eligible family under Section 23(n)(3) of the 1937 Act, or individuals exempt from the Community Service Requirement under Section 12(c)(2)(A), (B), (D), and (E) of the 1937 Act.

This alternative family selection procedure supports TGHA's broader economic mobility initiative by shifting MTW FSS from a voluntary, interest-based enrollment model to a targeted enrollment strategy focused on all work-capable, non-exempt households. The goal is to increase participation in self-sufficiency activities, improve educational and employment outcomes, promote asset building and homeownership, and facilitate successful transitions from housing assistance while preserving resources to serve additional families in need.

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.

TGHA utilizes a locally developed Partnership Agreement in place of HUD's standard Family Self-Sufficiency (FSS) Contract of Participation. Following consultation with HUD FSS staff, TGHA determined that the use of a Partnership Agreement better supports the administration of its MTW FSS Success Paths model and more effectively reflects the mutual commitments and responsibilities of both the family and the agency throughout participation in the program. TGHA previously submitted its proposed Partnership Agreement and related revisions to its FSS Action Plan for HUD review and approval. As additional MTW policy modifications are implemented through Form HUD-50075-MTW, TGHA will update its FSS Action Plan and Partnership Agreement as necessary to ensure consistency with approved program requirements.

Under this activity, TGHA will not require MTW FSS participation for individuals who do not meet the definition of an eligible family under Section 23(n)(3) of the United States Housing Act of 1937 or for individuals exempt from the Community Service Requirement under Sections 12(c)(2)(A), (B), (D), and (E) of the Act. Non-exempt households will be required to participate in self-sufficiency activities and comply with the requirements of their Partnership Agreement as a condition of continued assistance, up to and including successful graduation from rental assistance programs.

If TGHA proposes termination of housing assistance or tenancy based on an alleged violation of mandatory MTW FSS participation requirements or the terms of the Partnership Agreement, the family will be entitled to due process through TGHA's Housing Choice Voucher informal hearing procedures.

Recruitment and enrollment will include outreach to all eligible households, during which participants will receive information regarding MTW FSS Success Paths, program expectations, assessment processes, available incentives, and opportunities for economic mobility. Participants will complete an initial assessment and execute a Partnership Agreement outlining individualized goals, milestones, responsibilities, and program requirements.

TGHA will employ enhanced engagement strategies to support participant success. Households that do not initially respond to outreach efforts or fail to engage in required activities will receive additional, targeted outreach. Non-FSS staff and community partners may be assigned to work with these households to identify barriers to participation, provide supportive services, and develop strategies to improve engagement and compliance.

Consistent with FSS program requirements, TGHA will not use income increases achieved during participation in the MTW FSS Program to alter a family's eligibility for continued participation in the MTW FSS Program or Housing Choice Voucher assistance. The use of the Partnership Agreement supports TGHA's broader goal of increasing participant accountability, promoting economic self-sufficiency, and establishing clear, individualized pathways toward financial independence and

eventual graduation from housing 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**

TGHA has modified the standard Family Self-Sufficiency (FSS) Contract of Participation and will utilize a locally developed Partnership Agreement for all MTW FSS participants. The Partnership Agreement is designed to align with the MTW Success Paths framework and provide consistent program terminology, participant expectations, and documentation across all self-sufficiency initiatives. The revised agreement more clearly defines the shared responsibilities of TGHA and participating families while supporting the agency's economic mobility objectives.

All households enrolled in Success Paths 2, 3, and 4 will participate in the MTW FSS Program and will be eligible for the FSS Escrow Program during their period of participation, in accordance with applicable program requirements. In addition to the opportunity to accumulate escrow savings, participating families may earn milestone-based incentives for achieving self-sufficiency goals as outlined in TGHA's MTW Incentive Chart. Incentives are intended to encourage progress toward educational attainment, employment advancement, financial capability, asset building, and homeownership goals.

TGHA will administer its MTW FSS Program in accordance with applicable FSS requirements and guidance and will maintain a current, HUD-approved FSS Action Plan consistent with 24 CFR 984.201, including any MTW-approved modifications. TGHA will execute a Partnership Agreement with each MTW FSS participant for a term of not less than five years and not more than ten years.

TGHA will not require MTW FSS participation as a condition of housing assistance for elderly or disabled families. In addition, participation will not be mandatory for individuals who do not meet the definition of an eligible family under Section 23(n)(3) of the United States Housing Act of 1937 or who are exempt from the Community Service Requirement under Sections 12(c)(2)(A), (B), (D), and (E) of the Act.

If TGHA proposes termination of housing assistance or tenancy based on an alleged violation of mandatory MTW FSS participation requirements or the terms of the Partnership Agreement, the family will be afforded due process through the Housing Choice Voucher informal hearing procedures in accordance with 24 CFR 982.555.

Consistent with FSS requirements, TGHA will not use increases in earned income achieved during participation in the MTW FSS Program to alter a family's eligibility for continued participation in the MTW FSS Program or Housing Choice Voucher assistance. Through the use of the Partnership Agreement, FSS escrow opportunities, and achievement-based incentives, TGHA seeks to promote participant accountability, encourage sustained engagement in self-sufficiency activities, and support successful transitions toward economic independence.

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 (TGHA) requires participating households to report changes in income as they occur. However, only increases in gross household income of \$500 or more per month will result in an interim recertification and corresponding rent adjustment. Income increases below this threshold will be documented but will not trigger an interim reexamination. This policy is intended to support economic mobility by allowing participants to pursue employment opportunities, wage increases, additional work hours, promotions, and career advancement without the immediate concern of increased rent obligations resulting from modest income gains. By reducing the frequency of interim rent adjustments, TGHA creates a stronger incentive for households to increase earned income and make progress toward self-sufficiency goals. In addition to supporting participants, the policy promotes administrative efficiency by significantly reducing the number of interim recertifications processed by staff. Resources and staff time previously dedicated to frequent income reexaminations can instead be redirected toward housing stability initiatives, economic mobility programs, coaching, financial capability services, and Family Self-Sufficiency (FSS) activities that help families achieve long-term independence. TGHA's goals for this activity are to encourage earned income growth, reduce disincentives to employment advancement, increase participant engagement in self-sufficiency efforts, and improve the efficient administration of the Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) programs through MTW flexibilities. TGHA will administer its MTW Family Self-Sufficiency (FSS) Program in accordance with applicable FSS requirements and guidance and will maintain a current HUD-approved FSS Action Plan consistent with 24 CFR 984.201, including all MTW-approved program modifications. TGHA will execute either HUD's FSS Contract of Participation or a locally developed Partnership Agreement with each participating family for a term of not less than five years and not more than

ten years.

Participation in the MTW FSS Program will not be mandatory for elderly or disabled families. In addition, TGHA will not require participation for individuals who do not meet the definition of an eligible family under Section 23(n)(3) of the United States Housing Act of 1937 or for individuals exempt from the Community Service Requirement under Sections 12(c)(2)(A), (B), (D), and (E) of the Act.

If TGHA proposes termination of housing assistance or tenancy based on an alleged violation of mandatory MTW FSS participation requirements, the family will be afforded due process through TGHA's Housing Choice Voucher informal hearing procedures in accordance with 24 CFR 982.555.

Consistent with FSS program requirements, TGHA will not use increases in earned income achieved during participation in the MTW FSS Program to change a family's eligibility for participation in the MTW FSS Program or its eligibility for Housing Choice Voucher assistance. Through this activity, TGHA seeks to align housing assistance with economic mobility objectives while reducing administrative burden and creating stronger incentives for participants to increase earnings and achieve self-sufficiency.

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?

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.

How will the MTW agency treat increased earnings for families participating in the FSS Program with MTW flexibility?

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.

12.b. - Work Requirement (HCV)

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

TGHA will require all non-exempt, work-capable households to meet a work requirement as a condition of continued participation in the HCV, PBV, and MTW Self-Sufficiency programs. The purpose of this activity is to promote employment, increase earned income, support economic mobility, and reduce long-term dependence on housing assistance.

The work requirement may be satisfied through any of the following:

- Employment of 30 or more hours per week;
- Participation in a certified vocational, apprenticeship, trade, workforce development, or skilled job training program; or
- Full-time enrollment in a degree, diploma, certification, or credentialing program, as defined by the educational institution.

Participants meeting the requirement through education or job training must provide documentation of enrollment and demonstrate satisfactory progress toward completion.

Households currently participating in the FSS program will also be subject to this requirement. However, individuals exempt from the Community Service Requirement under federal law, persons who are pregnant, primary caregivers of a child under age six, elderly persons, persons with disabilities, and other households approved under TGHA's hardship policy will be exempt.

TGHA will provide supportive services and referrals to assist families in meeting the requirement. Households that lose employment after becoming compliant will be provided a 90-day compliance period to regain employment or otherwise satisfy the requirement.

Failure to comply with the work requirement, without a qualifying exemption or approved hardship, will constitute non-compliance with program requirements. Continued non-compliance after applicable notices and cure periods may result in termination of housing assistance, subject to all applicable hearing and due process protections.

This activity supports TGHA's goals of increasing workforce participation, encouraging self-sufficiency, and improving the long-term sustainability of housing assistance resources.

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

Self-sufficiency

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

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households? The MTW activity applies 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. 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.
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 work requirement MTW activity exempt any type of household or individual other than those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation? No
What counts as "work" under this the work requirement MTW activity? 30 hours total per week per household or enrollment on a full-time basis in education offering a degree or certificate.
How will the MTW agency monitor compliance with the work requirement MTW activity?

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.

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

TGHA has executed Memoranda of Understanding (MOUs) with a variety of community partners that outline available services, eligibility requirements, and participation criteria. During one-on-one meetings, FSS Coordinators assess each household's needs and make referrals to appropriate partner agencies to support compliance with the work requirement and advancement of self-sufficiency goals. Partner organizations provide feedback and outcome data regarding participant engagement and progress. Community partners currently available to assist households include TalentRise GVL (Greenville Chamber), Greenville Technical College Continuing Education, SC Works, United Way, United Ministries, and Goodwill. These partnerships provide access to employment services, workforce development, education and training opportunities, career counseling, financial capability programs, and other supportive services designed to promote economic mobility and long-term self-sufficiency.

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

Households subject to the work requirement will receive education, coaching, employment support, and referrals to community resources to assist them in achieving and maintaining compliance. TGHA's objective is to encourage successful participation through engagement and supportive services before imposing sanctions for non-compliance.

Non-exempt households are required to comply with the work requirement by maintaining at least 30 hours per week of employment, participating in an approved certified job training program, or maintaining full-time student status. Households experiencing barriers to compliance may request consideration under TGHA's hardship policy and may be granted a temporary exemption when appropriate.

When a household fails to comply with the work requirement, TGHA will first provide notice of non-compliance, opportunities for coaching, and assistance in developing a plan to regain compliance. Households that become non-compliant after previously meeting the requirement, such as through a loss of employment, will be provided a 90-day period to regain compliance. During this period, participants will be expected to actively pursue employment, education, or approved training activities.

If a household continues to be non-compliant after all applicable notices, corrective action periods, and hardship reviews have been exhausted, the household will be considered to have chosen not to meet the conditions of continued participation in the program. Continued non-compliance may result in termination of housing assistance in accordance with TGHA policies and applicable due process requirements.

Participants who elect Success Path 1 and comply with Path 1 requirements may receive education and coaching services for up to four years. Assistance under this path is time-limited and intended to provide support while participants evaluate opportunities for greater self-sufficiency. Participants who advance their education, employment, financial capability, or homeownership goals through Success Paths 2, 3, and 4 may receive extended assistance for up to ten years, based on continued compliance and achievement of program milestones.

To encourage participation and progress, TGHA provides ongoing financial incentives for the completion of self-sufficiency goals. In addition, TGHA has received a \$250,000 grant from a local foundation to support participant incentives and other economic mobility activities. Through a combination of supportive services, milestone incentives, and progressively longer periods of assistance tied to self-sufficiency achievements, TGHA seeks to increase employment, promote economic mobility, and support successful transitions from housing assistance.

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	Will the MTW agency submit request for approval of a Safe Harbor Waiver this year? No Safe Harbor Waivers are being requested.

E.	Agency-Specific Waiver(s).				
E.1	Agency-Specific Waiver(s) for HUD Approval: 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. 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. 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. Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year? Yes				
	<table border="1"> <thead> <tr> <th>Title</th> <th>Supporting Documents Attached</th> </tr> </thead> <tbody> <tr> <td>Applying MTW administrative flexibilities to the VASH and EHV programs.</td> <td>0</td> </tr> </tbody> </table>	Title	Supporting Documents Attached	Applying MTW administrative flexibilities to the VASH and EHV programs.	0
Title	Supporting Documents Attached				
Applying MTW administrative flexibilities to the VASH and EHV programs.	0				

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

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

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

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

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

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

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

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	
2 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

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1.f. Minimum Rent
1. Impact on TGHA Finances	
TGHA anticipates that implementing a \$125 minimum rent for non-exempt households will result in a modest decrease in Housing Assistance Payment (HAP) expenditures by ensuring that all participating households contribute a minimum amount toward housing costs. The activity is expected to improve the long-term financial sustainability of the Housing Choice Voucher Program while generating only a minimal increase in participant rent obligations for households currently paying less than the proposed minimum rent. Revenue generated through the minimum rent requirement will help support broader MTW self-sufficiency initiatives and economic mobility activities. The activity is not expected to create high additional administrative costs.	
2. Affordability of Housing Costs for affected families.	
The activity may increase housing costs for certain households whose current rent contribution is below \$125 per month. However, the proposed minimum rent amount is modest and is intended to encourage participant responsibility for housing costs while maintaining affordability. TGHA will maintain a hardship policy that allows households experiencing financial hardship, involuntary loss of income, medical emergencies, disability-related circumstances, domestic violence, or other qualifying events to request temporary or permanent relief from the minimum rent requirement. This hardship protection is intended to mitigate adverse impacts on vulnerable households.	
3. Wait List	
This activity is not anticipated to have a direct impact on the Housing Choice Voucher waiting list. Any reduction in HAP expenditures is expected to be modest and is unlikely to significantly affect the number of families served in the short term. Over time, increased cost-effectiveness may contribute to the agency's ability to maximize available resources and serve additional eligible households.	
4. Termination Rate	
TGHA does not anticipate a significant impact on program termination rates as a result of the minimum rent policy. The minimum rent amount is relatively low, and hardship protections will be available to households unable to pay due to circumstances beyond their control. Participant education, coaching, and outreach efforts are expected to minimize the likelihood of rent-related terminations further.	
5. Utilization Rate in HCV	
TGHA does not operate public housing. The minimum rent activity is not anticipated to impact HCV utilization rates negatively. Because the activity has only a modest effect on participant rent obligations, voucher utilization and leasing activity are expected to remain stable. Any modest reduction in HAP expenditures may improve the agency's ability to manage available funding efficiently.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity supports the MTW statutory objectives of Cost Effectiveness and Self-Sufficiency. Requiring a minimum participant contribution toward housing costs encourages greater financial responsibility and helps prepare households for housing situations where rent is not directly tied to income. The activity complements TGHA's Success Paths Program, work requirement, Family Self-Sufficiency activities, financial capability services, and economic mobility initiatives by reinforcing expectations related to employment, budgeting, and financial planning.	

7. Impact on TGHA's Ability to Meet MTW Statutory Goals

This activity is not anticipated to adversely affect TGHA's ability to meet any MTW statutory goals. Instead, the activity is expected to support cost effectiveness and self-sufficiency objectives while maintaining housing stability through the use of hardship protections and exemptions for eligible households.

8. Impact on Rate of Hardship Requests

TGHA anticipates that some households may request hardship exemptions as a result of the minimum rent requirement. Hardship requests are most likely to involve loss of employment, significant reductions in household income, medical hardships, disability-related circumstances, domestic violence situations, or other documented financial challenges. The agency expects that hardship requests will be reviewed on a case-by-case basis and approved when qualifying circumstances exist. Overall, the number of hardship requests is expected to remain manageable due to the relatively modest minimum rent amount.

9. Impact on Protected Classes and Associated Disparate Impact

TGHA does not anticipate that the minimum rent activity will create a disparate impact on any protected class. The policy applies uniformly to all non-exempt households subject to the activity. Elderly households, disabled households, and households approved for hardship relief may be exempt from the minimum rent requirement in accordance with agency policies. TGHA will monitor hardship requests, approvals, denials, participant outcomes, and program data to identify and address any unintended impacts on protected classes and will make policy adjustments if necessary to ensure equitable implementation.

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1.h. Tenant Payment Modified Percent of Income
1. Impact on TGHA Finances	
The 32% tenant rent contribution requirement has been implemented for non-exempt households. The activity continues to modestly reduce Housing Assistance Payment (HAP) expenditures by increasing participant contributions toward housing costs. Savings generated through this activity help offset the increased costs associated with enhanced standard deductions, FSS escrow participation, participant incentives, and other Success Paths Program activities	
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. The activity may increase rent contributions for some households; however, the impact is moderated through the use of standard deductions, childcare deductions, incentive payments, and available hardship protections. Elderly and disabled households are exempt from this policy	
3. Wait List	
This activity is not anticipated to directly impact the waiting list. Any HAP savings generated may support long-term program sustainability and future admissions.	
4. Termination Rate	
TGHA does not anticipate a significant impact on termination rates. Hardship policies and supportive services are available for households experiencing financial difficulties.	
5. Utilization Rate in HCV	
The activity is not anticipated to negatively affect voucher utilization. TGHA expects leasing and program participation levels to remain stable while realizing modest savings through increased participant rent contributions.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity advances both Cost Effectiveness and Self-Sufficiency by encouraging participants to assume greater responsibility for housing costs while helping preserve program resources. The policy supports the broader Success Paths strategy focused on employment, financial capability, and economic mobility.	
7. Impact on TGHA's Ability to Meet MTW Statutory Goals	
The activity is expected to support statutory MTW objectives by improving cost effectiveness while maintaining housing stability through hardship protections and exemptions.	
8. Impact on Rate of Hardship Requests	
Some hardship requests may occur among households experiencing income loss, medical emergencies, or other qualifying circumstances. TGHA expects the overall number of requests to remain manageable due to the relatively modest increase in tenant contribution requirements.	
9. Impact on Protected Classes and Associated Disparate Impact	
TGHA does not anticipate disparate impacts on protected classes. Elderly and disabled households are exempt, and the agency will continue monitoring hardship requests, program outcomes, and participant data to identify and address any unintended effects. TGHA will monitor impact on protected classes and disparate impact by monitoring request for hardship adjustments and by conducting periodic surveys.	

IMPACT ANALYSIS	
MTW Activity – Tenant Rent Policies Agency Specific Waiver	1.u. Standard Deductions
1. Impact on TGHA Finances	
The standard deduction provides \$500 per household member, up to six household members, and replaces traditional dependent, elderly/disabled, and medical deductions while maintaining childcare deductions. This activity increases program expenditures compared to traditional calculations but serves as a direct investment in participant economic mobility and household stability. This provides a greater benefit to MTW participants than the current deduction, which allows for \$480 deductions for minors who are 18 years or younger. The standard deduction actually serves as an incentive for MTW participants.	
2. Affordability of Housing Costs for affected families.	
The policy improves affordability by reducing adjusted income used for rent calculations. Many families experience lower rent burdens and increased disposable income available for transportation, childcare, education, savings, and employment-related expenses.	
3. Wait List	
The activity is not anticipated to affect waiting list operations.	
4. Termination Rate	
The activity is expected to reduce financial stress and may help improve housing stability, resulting in no anticipated increase in programming terminations.	
5. Utilization Rate in HCV	
The activity is not expected to impact utilization rates negatively. Improved affordability may support long-term household stability and successful program participation.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
The activity promotes Self-Sufficiency by allowing participants to retain more income while they pursue employment, education, workforce development, homeownership preparation, and financial capability goals through Success Paths. 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 apply best the savings afforded through this initiative.	
7. Impact on TGHA's Ability to Meet MTW Statutory Goals	
The activity supports TGHA's self-sufficiency objectives while complementing work requirements, FSS participation, and economic mobility initiatives.	
8. Impact on Rate of Hardship Requests	
The activity is not expected to generate hardship requests because it generally reduces participant rent obligations.	
9. Impact on Protected Classes and Associated Disparate Impact	
TGHA does not anticipate disparate impacts. The policy applies uniformly to eligible non-exempt households and generally provides financial benefit.	

IMPACT ANALYSIS	
MTW Activity – Reexaminations	3.b. – Alternate Reexamination Schedule
1. Impact on TGHA Finances	
Triennial reexaminations significantly reduce administrative workload and allow staff resources to be redirected toward Success Paths coaching, case management, employment support, and economic mobility services. Households remain responsible for reporting changes in income and family composition, and TGHA will continue to process interim adjustments when required under agency policy. TGHA implemented tri-annual reexaminations in February 2025.	
2. Affordability of Housing Costs for affected families.	
Households continue to have access to interim adjustments when qualifying income changes occur. Therefore, affordability is not expected to be negatively affected.	
3. Wait List	
This activity will have no impact on the wait list.	
4. Termination Rate	
This activity is not anticipated to impact on the termination rate. Households can request interim adjustments when qualifying changes occur, reducing the likelihood that families will experience hardship related to delayed rent adjustments.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is not anticipated to impact utilization rates. Administrative efficiencies achieved through triennial recertifications may improve staff capacity and operational effectiveness, supporting continued program utilization and participant services.	
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice	
This activity supports the MTW statutory objective of cost effectiveness by reducing the administrative burden associated with annual recertifications. The efficiency gains allow TGHA staff to devote more time to participant engagement, economic mobility services, employment support, and Success Paths activities designed to promote long-term 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. This activity is expected to support, rather than hinder, TGHA's ability to achieve MTW statutory goals. The administrative efficiencies generated through the alternative reexamination schedule provide additional capacity to focus on self-sufficiency initiatives while maintaining program integrity through required reporting and interim adjustment processes.	
8. Impact on Rate of Hardship Requests	
This activity is not expected to impact the rate of hardship requests. Participants continue to have access to interim rent adjustments when qualifying changes in income or household circumstances occur, helping to reduce the need for hardship relief related to rent affordability	
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 – Reexaminations	7.b. – Term-Limited Assistance
1. Impact on TGHA Finances	
Over time, time-limited assistance is expected to reduce long-term subsidy obligations and increase the availability of resources for new admissions. Financial impacts will materialize as participants reach Success Path milestones and program completion dates. 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.	
The activity itself does not immediately affect rent affordability. Participants receive extensive coaching, incentives, employment supports, education opportunities, FSS participation, and financial capability services designed to prepare them for eventual transition from assistance.	
3. Wait List	
The activity is expected to positively impact the waiting list over time by creating opportunities to assist additional eligible households as participants successfully transition from assistance.	
4. Termination Rate	
This activity is anticipated to impact the termination rate. Program exits are expected to increase as households reach term limits or successfully graduate from assistance. However, TGHA's goal is that exits occur through increased self-sufficiency rather than involuntary termination.	
5. Occupancy Level in Public Housing and Utilization Rate in HCV	
This activity is anticipated to impact utilization rates at year four. Voucher turnover resulting from successful graduations may improve TGHA's ability to assist additional households while maintaining high utilization rates. 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 is central to TGHA's Self-Sufficiency strategy and supports workforce participation, educational attainment, financial capability, homeownership preparation, and successful transitions from housing assistance.	
7. Impact on TGHA's Ability to Meet MTW Statutory Goals	
The activity directly supports MTW self-sufficiency objectives while preserving resources to serve additional families.	
8. Impact on Rate of Hardship Requests	
Some hardship requests are anticipated as households encounter barriers to meeting Success Path requirements or approaching assistance deadlines. TGHA's hardship policy provides flexibility for qualifying circumstances.	
9. Impact on Protected Classes and Associated Disparate Impact	
TGHA does not anticipate disparate impacts because elderly and disabled households are exempt and hardship protections are available. Ongoing monitoring will occur throughout implementation.	

IMPACT ANALYSIS

MTW Activity – Self-Sufficiency Program & Work Requirement

12.b. – Work Requirement

1. Impact on TGHA Finances

TGHA has implemented the work requirement as part of the Success Paths Program for approximately 1,390 non-exempt households. Increased workforce participation, educational enrollment, and income growth are expected to contribute to long-term reductions in subsidy costs while supporting economic mobility. TGHA continues to invest in coaching, incentives, partner services, and workforce development supports. TGHA has completed initial Success Paths Program orientations with 817 households and began recording activity related to employment. Currently 591 families have enrolled in one of the four Success Paths.

MTW/FSS Enrollments as of July 2026

MTW FSS MONTHLY REPORT	
Total Enrolled in MTW FSS in 2025	288
January-26	14
February-26	53
March-26	52
April-26	42
May-26	69
June-26	41
July-26	32
August-26	0
September-26	0
October-26	0
November-26	0
December-26	0
<i>Enrolled in Success Path 1</i>	14
<i>Enrolled in Success Path 2</i>	133
<i>Enrolled in Success Path 3</i>	413
<i>Enrolled in Success Path 4</i>	7
<i>Enrolled, Now Past Participants</i>	14
Total MTW FSS Enrolled Families	591

2. Affordability of Housing Costs for affected families.

The activity is intended to improve long-term affordability and household financial stability through increased earned income, educational attainment, workforce participation, and career advancement.

3. Wait List

The activity is not anticipated to have a direct impact on the wait list in the short term. Long-term self-sufficiency outcomes may create additional opportunities for new admissions

4. Termination Rate
Some households may face termination if they repeatedly fail to comply and do not qualify for hardship protections. However, TGHA emphasizes coaching, supportive services, corrective action periods, and hardship reviews before any adverse action occurs.
5. Occupancy Level in Public Housing and Utilization Rate in HCV
No significant impact on voucher utilization is anticipated. Continued compliance and successful participant engagement should support program stability.
6. Meeting the MTW Goals of Cost Effectiveness, Self-Sufficiency, or Expanding Housing Choice
The work requirement directly advances Self-Sufficiency by increasing employment, educational participation, workforce engagement, and economic mobility. The activity is a foundational component of the Success Paths Program.
7. Impact on TGHA's Ability to Meet MTW Statutory Goals
The activity strongly supports MTW self-sufficiency goals and promotes long-term program sustainability by encouraging labor force participation and economic advancement.
8. Impact on Rate of Hardship Requests
TGHA anticipates hardship requests from households experiencing employment barriers, medical issues, family caregiving responsibilities, temporary crises, or other circumstances beyond their control. Existing hardship procedures provide accommodation and temporary exemptions when justified.
9. Impact on Protected Classes and Associated Disparate Impact
TGHA does not anticipate disparate impacts because elderly persons, persons with disabilities, pregnant individuals, caregivers of children under six, and other exempt populations are excluded from the work requirement. The agency will continue monitoring participant data and outcomes to ensure equitable implementation.

HARDSHIP POLICY MOVING TO WORK

SUPPLEMENT 2027

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.f. Minimum Rent
1.h. Tenant Payment Modified Percent of Income
1.u. Standard Deductions
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

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.

If TGHA determines that a hardship exists, the agency will determine whether the exemption should be granted on a temporary or permanent basis. Temporary exemptions are generally approved for 90-day periods and are reviewed every 90 days to determine whether the hardship continues to exist. Participants may be required to provide updated documentation as part of the review process. Permanent exemptions may be granted when documentation supports that the participant has a chronic medical condition, long-term disability, or other condition that permanently prevents compliance with the work requirement.

Success Paths Incentive Chart				
Success Path One: 4-Year Path to Independence				
Success Path 1 Goals	Program Years	Eligibility	Amt	Maximum
Engage in Financial Education	Up to 4	1x per Year / Household	50	200
Coaching Activities	Up to 4	2x per Year / Household	50	400
Completion of Annual Progress Meeting	Up to 4	Annually / Household	100	400
Attend 1 TGHA Workshop or Goal Group	Up to 4	Annually / Household	100	400
Success Path Two: 5-6 Year Path to Education & Training				
Success Path 2 Goals	Program Years	Eligibility	Amt	Maximum
Engage in Financial Education	Up to 6	1x per Year / Household	50	200
Coaching Activities	Up to 6	2x per Year / Household	50	600
Completion of Annual Progress Meeting	Up to 6	Annually / Household	100	600
Attend 1 TGHA Workshop or Goal Group	Up to 6	Annually / Household	100	600
Completion of Training/Certification Program	Up to 6	One-Time	250	500
Completion of HS Diploma/GED	Up to 6	One-Time	250	250
Completion of Associate Degree	Up to 6	One-Time	500	500
Completion of Bachelor Degree	Up to 6	One-Time	1000	1000
Completion of Masters or Doctorate Degree	Up to 6	One-Time	1500	1500
Success Path Three: Path to Job Retention & Financial Stability				
	Program Years	Eligibility	Amt	Maximum
Establishment of FSS Escrow Account	Up to 7	Recurring	varies	varies
Engage in Financial Education	Up to 7	3x per Year / Household	50	1050
Coaching Activities	Up to 7	2x per Year / Household	50	700
Completion of Annual Progress Meeting	Up to 7	Annually / Household	100	700
Attend 1 TGHA Workshop or Goal Group	Up to 7	Annually / Household	100	700
Obtain new Employment (First Time)	Up to 7	One-Time	500	500
Employment Retention for 12 Consecutive Months	Up to 7	Annually	250	1750
Improve Credit Score to 640+	Up to 7	One-Time	300	300
Open and Maintain a New Checking or Savings Account	Up to 7	One-Time	200	200
Increase & Maintain Personal Savings by at least \$200 over a 12 month period.	Up to 7	One-Time	200	200

Increase Earned Income by 3%	Up to 7	Annually	100	700
Entrepreneurship	Up to 7	One-Time	2500	2500
Success Path Four: Path to Homeownership				
	Program Years	Eligibility	Amt	Maximum
Engage in Financial Education	Up to 10	1x per Year / Household	50	200
Coaching Activities	Up to 10	2x per Year / Household	50	1000
Completion of Annual Progress Meeting	Up to 10	Annually / Household	100	1000
Attend 1 TGHA Workshop or Goal Group	Up to 10	Annually / Household	100	1000
Engage in Homeownership Preparation Activities	Up to 10	Two Times	100	200
Purchase a Home	Up to 10	One-Time	2000	2000
Personal Goals				
	Program Years	Eligibility	Amt	Maximum
Completion of 5 Personal S.M.A.R.T Goals Established at Admissions & Progress Meeting	4,6, 7, 10	Up to 5 goals	250	250

**Request for Waiver – Applying MTW Administrative Flexibilities to HUD-Veteran Affairs
Supportive Housing (VASH)& Emergency Housing Vouchers (EHV)**

Purpose

This request seeks HUD approval to apply certain MTW administrative flexibilities to HUD-Veteran Affairs Supportive Housing (VASH), & Emergency Housing Vouchers (EHV), in accordance with the MTW Operations Notice (85 FR 53444, Aug. 28, 2020) and the Special Purpose Voucher MTW FAQ (Oct. 2023).

MTW Flexibilities Requested

We propose applying the following MTW administrative flexibilities to HUD-Veterans Affairs Supportive Housing (VASH) and Emergency Housing Vouchers (EHV) to create a more consistent, streamlined program structure across TGHA and reduce the administrative burden associated with maintaining separate processes and requirements.

- **Total Tenant Payment as a Percentage of Gross Income:** Permit non-elderly, non-disabled families to adopt a rent structure based on 32 percent of adjusted household income.
- **Utility Reimbursements:** Permit the discontinuation of utility reimbursements payments when the utility allowance exceeds the family's total tenant payment for non-elderly, non-disabled families.
- **Standard Deductions:** Apply standard deduction of \$500 per person up to six household members for non-elderly, non-disabled families.
- **Alternative Reexamination Schedule for Households:** Permit triennial recertifications for all assisted families.
- **Self-Certification of Asset:** Permit the self-certification of assets up to \$50,000 for all assisted families.

Compliance with SPV Requirements

We confirm that the proposed flexibilities do not conflict with the SPV's authorizing language or operating requirements. Where MTW flexibilities would conflict, HUD-VASH and EHV requirements take precedence. We will continue to administer SPV vouchers in accordance with the SPV's statutory and regulatory requirements.

Safe Harbors

We will implement the requested flexibilities with the associated safe harbors as defined in the MTW Operations Notice, ensuring that any changes are within HUD's approved scope and that families are not disadvantaged.

