

PHA Name: Fort Mill

PHA Code: SC036

MTW Supplement for PHA Fiscal Year Beginning: 07/01/2026 (implemented January 1, 2027)

PHA Program Type: Housing Choice Voucher Only

MTW Cohort: 1

MTW Supplement Submission Type: Annual

## B. MTW Supplement Narrative

The third year of the Housing Authority of Fort Mill's MTW implementation saw major changes affecting participant rents and how the program operates. The percentage of income used to calculate the participant's TTP was reduced from 29% to 28%. This caused the monthly Housing Assistance Payment (HAP) paid by the Agency to increase by approximately \$2164.00, with the decrease to the total tenant obligation being equal to the HAP increase. This change is aimed at minimizing the effect caused by other changes outlined later in this narrative. Overall monthly HAP cost was also increased by approximately \$44.00 due to the increase in the payment standards on bedroom size within one zip code in the Housing Authority's Small Area Fair Market Rent metropolitan area. The Agency, again, did not implement a simplified Utility Allowance as first noted in our Moving-to-Work Plan. Due to a major increase in the rates of one electricity provider and many participants receiving services from the company that did not increase rates, the Agency's monthly costs would have increased by an additional \$2,200.00 a month. By using the updated version of the current Utility Allowance schedule, the increase was reduced to \$452.00. The Housing Authority will again assess the utility cost for the 2027 Calendar year to see if a simplified Utility Allowance is workable with the budget. The new utility allowance average should be an enormous time saver for the Housing Authority and make it easier for a client to comprehend.

To improve cost effectiveness and reduce the administrative burden, the Housing Authority adopted a biennial inspection schedule beginning January 1, 2024. This has greatly reduced the administrative burden by allowing the Section 8 Coordinator, who also is the inspector, to focus more on issuing new vouchers and completing interviews from the last time the waitlist was opened. This will also allow her to focus on the creation of a local self-sufficiency program to assist our client in advance of the work requirements taking effect January 1, 2029.

Annual reexaminations were done for all households on January 1, 2026, and will continue with that at least until the complete phase-in is complete. While it is a major undertaking to complete annual recertification for all program participants at the same time, the administrative burden was reduced this year because all fixed-income families within the program are now only required to submit annual recertification documentation every three years. They will be required again to complete paperwork for the annual recertifications effective for January 1, 2028. The Agency's staff are still completing annual recertifications for these families, applying and cost-of-living adjustment for Social Security recipients, applying the new Utility Allowance, and updating the payment standards, if applicable.

The Agency continued the cost saving measure of only completing interim recertification for specific reasons. These reasons include rent increases requested by the landlord, adding a household member, removing a household member, and income decreases requested due to hardship. Interims are not completed if a participant reports an increase in the household income. Instead, increases will take effect at the next annual recertification. Not only does this reduce the burden for the Section 8 Coordinator, but it also permits the family to save their excess income or pay off debts to allow them to gain a better financial position. In the year 2025, we had thirteen families report income increases that were not acted on. There were probably several families that did not report changes since no action was taken by the Housing Authority. In that same period, 31 families reported decreases in income due to hardship.

The minimum rent used by the Housing Authority of Fort Mill's Section 8 program remains at \$100.00.

Self-Certification of assets is now allowable by any household where the combined asset value is less than \$50,000.00. Assets not being verified unless over \$50,000 is an immense time saver for everyone.

The Housing Authority of Fort Mill also put a minimum income into effect for all non-elderly/non-disabled households. This minimum income was based on 15 hours per week at the current federal minimum wage (\$7.25), or \$5,655.00. This minimum income affected 6 families on the program, increasing their TTP by \$32.00. The minimum income will increase effective January 1, 2027, to be equal to 20 hours per week at the current federal minimum wage, or \$7,540.00.

The Housing Authority's overall perspective is to increase participant self – sufficiency. Currently, there is no work mandate for current participants, but there is a working preference for the waitlist and a work requirement for all income portability clients. The hope for the work requirement is to motivate individuals, perhaps in small increments, to become gainfully employed, as well to save funds that are being provided for HAP. The Housing Authority continues to seek partnerships with local community, welfare, service, and educational organizations over the 2026-2027 fiscal year to establish partnerships to offer services to our participants to assist them in becoming self-sufficient. The Agency held two resident meetings to get client feedback to help build this program. The first meeting did not have any client participation and the second only had two elderly clients in attendance. The Housing Authority then sent out surveys to get client feedback on their barriers to self-sufficiency, and the types of partnerships would be beneficial. Currently, those surveys are being returned. The Agency has also met with the local chapter of the United Way to start a partnership with them to offer financial literacy classes. More partnerships will be established once the Housing Authority is able to identify those that will be the best fit for the clients.

The Housing Authority will continue to offer the landlord incentive for new lease up's as well as referral bonus for a new landlord that leases to a voucher holder. Since this incentive began on January 1, 2024, the Housing Authority has added 22 new landlords. Currently, ways are being sought to reach out to landlords, whether it be through flyers, social media, or other avenues. The Housing Authority covers a large area with the town of Fort Mill, Tega Cay and the area known as Indian Land in Lancaster County. Rental prices are rather expensive, but affordable units can be found. Except for the 4-bedroom payment standards for Indian Land, all other payment standards decreased effective October 1, 2025. While the reduction in payment standards will allow the Agency to house more families, it will also make finding approvable rentals even more difficult for our clients. It will be beneficial to most that payment standards are not changed until the second annual reexamination following the effective date. With this rule, no current participant's rent will increase because of the decrease in the payment standards.

The effective date of most of these changes differs from the beginning of the Agency's fiscal year because it coincides with the implementation of Social Security Cost-of-living Adjustments and any new Utility Allowance Schedule. This allows the Agency to streamline most of the annual changes for participants.

The overall goal for the Housing Authority is to have a prosperous program with prosperous clients that will eventually be able to be self-sufficient, then allowing for new clients to come on the program and get their help to move forward. The ultimate aim is to assist more families with our limited resources and to offer our clients the opportunities they need to become self-sufficient.

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

1. Tenant Rent Policies	
f. Minimum Rent (HCV)	Implemented 1/1/2024, Changed 1/1/2025
h. Total Tenant Payment as a Percentage of Gross Income	Implemented 1/1/2025, Changed 1/1/2026, Changing 1/1/2027
J. Alternative Utility Allowance (HCV)	Implementing 1/1/2027
o. Initial Rent Burden	Implemented 1/1/2024
2. Payment Standards and Rent Reasonableness	
3. Reexaminations	
d. Self-Certification of Assets (HCV)	Implemented 1/1/2025
4. Landlord Leasing Incentives	
d. Other Landlord Incentives (HCV)	Implemented 1/1/2024
5. Housing Quality Standards (HQS)	
d. Alternative Inspection Schedule	Implemented 1/1/2025
6. Short Term Assistance	
7. Term-Limited Assistance	
8. Increase Elderly Age (PH & HCV)	
9. Project-Based Voucher Program Flexibility	
10. Family Self-Sufficiency Program with MTW Flexibilities	
11. MTW Self-Sufficiency Program	
12. Work Requirement	
b. Work Requirement (HCV)	Implemented 1/1/2024
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
14. Moving on Policy	
15. Acquisition without Prior HUD Approval (PH)	
16. Deconcentration of Poverty in Public Housing Policy (PH)	
17. Local, Non-Traditional Activities	

C. MTW Activities that the Housing Authority of Fort Mill Plans to implement in the submission year or Is currently implementing.

<b>1. f. – Minimum Rent (HCV)</b>
The minimum rent was changed to \$75.00 for all households effective 1/1/2024. It was then increased to \$100.00 effective 1/1/2025. No clients have stated an undue hardship with this increase, however hardship exception is available if necessary. An increase in minimum rent may encourage employment; however, this has not been noticed at this time with a substantial difference. These changes save clients time and, in some cases, lower costs.
Which MTW statutory objective does this MTW activity serve? Cost effectiveness
What are the cost implications of this MTW activity? Decrease expenditures
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers. However, there is a possibility, especially if new units are built in the Housing Authority of Fort Mill's jurisdiction. There is speculation that this could occur.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes, this is an approved HUD waiver, Certain provisions of sections 3(a)(3)(A) and 8(o)(2)(A)-(C) OF THE Act and 24 C.F.R. 5.6328 and 5.630
Does the MTW activity require a hardship policy? Yes
Does the hardship policy apply to more than this MTW activity? Yes The attached hardship policy applies to: 1 f. – Minimum Rent (HCV) 1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV) 1 q. – Imputed Income (HCV) 1 s. – Elimination of Deductions (HCV) 2 b. – Payment Standards – Small Area Fair Market Rents (HCV) 3 b. – Alternative Reexamination Schedule for Households (HCV) 12 b. – Work Requirements (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? There has been no modifications to the hardship policy.
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? Yes, it does, however, the form for an impact analysis is on the HIP portal and not available at this time.
Does the impact analysis apply to more than this MTW activity? Yes The attached impact analysis applies to: 1 f. – Minimum Rent (HCV) 1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV) 1 o. – Initial Rent Burden (HCV) 1 q. – Imputed Income (HCV) 1 s. – Elimination of Deduction(s) (HCV) 2 a. – Payment Standards – Small Area Fair Market Rents (HCV) 3 b. – Alternative Reexamination Schedule for Households (HCV) 12 b. – Work Requirements (HCV)
Minimum Rent or Minimum Total Tenant Payment (TTP) = \$75.00 in year 1, \$100 in year 2 to increase cost effectiveness and encourage employment among the non-elderly/disabled HCV participants.

<b>1.h – Tenant Payment as a Modified Percentage of Income (HCV)</b>
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<p>Effective January 1, 2027, the percentage of household income used to calculate TTP will change from 28% of their income to 27%. All tenants have been notified of this change and will be notified monthly until the change occurs. There is no defined income basis, this will be for all tenants.</p>
<p>Which MTW statutory objective does this MTW activity serve? Cost effectiveness</p>
<p>What are the cost implications of this MTW activity? Decrease tenant burden</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households</p>
<p>Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? This MTW activity applies to all new admissions and currently assisted households</p>
<p>Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types</p>
<p>Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes, this is an approved HUD waiver, Certain provisions of sections 3(a)(3)(A) and 8(o)(2)(A)-(C) OF THE Act and 24 C.F.R. 5.6328 and 5.630</p>
<p>Does the MTW activity require a hardship policy? Yes</p>
<p>Does the hardship policy apply to more than this MTW activity? Yes The attached hardship policy applies to: 1 f. – Minimum Rent (HCV) 1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV) 1 q. – Imputed Income (HCV) 1 s. – Elimination of Deductions (HCV) 2 b. – Payment Standards – Small Area Fair Market Rents (HCV) 3 b. – Alternative Reexamination Schedule for Households (HCV) 12 b. – Work Requirements (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? There has been no modifications to the hardship policy.</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill:  <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending</p>
<p>Does this MTW activity require an impact analysis? Yes, it does, however, the form for an impact analysis is on the HIP portal and not available at this time</p>
<p>Does the impact analysis apply to more than this MTW activity? Yes The attached impact analysis applies to: 1 f. – Minimum Rent (HCV) 1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV) 1 o. – Initial Rent Burden (HCV)</p>

<p>1 q. – Imputed Income (HCV)</p> <p>1 s. – Elimination of Deduction(s) (HCV)</p> <p>2 a. – Payment Standards – Small Area Fair Market Rents (HCV)</p> <p>3 b. – Alternative Reexamination Schedule for Households (HCV)</p> <p>12 b. – Work Requirements (HCV)</p>
<p>Tenant Payment as a Modified Percentage of Income (HCV) – The percentage of income used to calculate TTP will decrease to 28% of the household income.</p>

<p><b>1.j. – Alternative Utility Allowance (HCV)</b></p>
<p>Currently, the utility allowances are derived from an average usage for different bedroom sizes and dwelling structures using the rates provided by the utility companies. A simplified utility allowance will be made by bedroom size effective January 1, 2027. This will include Electric, Natural Gas, Propane, Oil but will not do averages on water and sewer, as these will continue to be done by company. The water and sewer have extreme differences based on whether in the township or in the county, or in the neighboring county that we serve. These utility allowances will be completed and sent out to all tenants no later than September 1, 2026, to allow for a 30-day notice of comment and once approved by the Board of Commissioners be in effect for January with any possible corrections. If the cost analysis done after the simplified utility allowances are calculated shows a substantial increase to the monthly HAP cost, the Housing Authority may decide to continue using the current utility allowance calculation method. This was not done effective for January 1, 2026 because it was determined that using the simplified utility allowance would cause a substantial increase to the monthly HAP due to the rate for one utility electricity provider increasing but the others did not.</p>
<p>Which MTW statutory objective does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity?</p> <p>Decrease expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing?</p> <p>This MTW activity applies to all assisted households</p>
<p>Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>This MTW activity applies to all new admissions and currently assisted households</p>
<p>Does this MTW activity apply to all family types or only to selected family types?</p> <p>This MTW activity applies to all family types</p>
<p>Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>This MTW activity applies to all tenant-based units.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity?</p> <p>Yes, this is an approved HUD waiver, Certain provisions of sections 3(a)(3)(A) and 8(o)(2)(A)-(C) OF THE Act and 24 C.F.R. 5.6328 and 5.630</p>
<p>Does the MTW activity require a hardship policy?</p> <p>Yes as in reference to the amount of rent that will be payable by the tenant.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>Yes</p> <p>The attached hardship policy applies to:</p> <p>1 f. – Minimum Rent (HCV)</p> <p>1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV)</p> <p>1 q. – Imputed Income (HCV)</p> <p>1 s. – Elimination of Deductions (HCV)</p> <p>2 b. – Payment Standards – Small Area Fair Market Rents (HCV)</p> <p>3 b. – Alternative Reexamination Schedule for Households (HCV)</p>

12 b. – Work Requirements (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? There has been no modifications to the hardship policy.
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? Yes, it does, however, the form for an impact analysis is on the HIP portal and not available at this time
Does the impact analysis apply to more than this MTW activity? Yes The attached impact analysis applies to: <ul style="list-style-type: none"> <li>1 f. – Minimum Rent (HCV)</li> <li>1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV)</li> <li>1 o. – Initial Rent Burden (HCV)</li> <li>1 q. – Imputed Income (HCV)</li> <li>1 s. – Elimination of Deduction(s) (HCV)</li> <li>2 a. – Payment Standards – Small Area Fair Market Rents (HCV)</li> <li>3 b. – Alternative Reexamination Schedule for Households (HCV)</li> <li>12 b. – Work Requirements (HCV)</li> </ul>
Alternative Utility Allowance (HCV) – Use a simplified utility allowance schedule if it is determined not to be cost detrimental to the program once the new costs are determined. This will average the cost for electricity, natural gas, propane, and oil based on unit size. Cost for water and sewer will still be averaged based on company and unit size.

<b>1. o. – Initial Rent Burden (HCV)</b>
The Initial Rent Burden increased from 40% to 50% 1/1/2025. This will allow clients to move in somewhere that may be somewhat above what can be a comfortable rent and to help with the overall high rental rates and the requirements for a smaller voucher size holder into a larger unit. In 2025, three families took advantage of this waiver to lease at units where the initial rent burden was slightly higher than 40%. Further assessment of the effectiveness of this effort will be done as more vouchers are issued in the future.
Which MTW statutory objective does this MTW activity serve? Housing choice
What are the cost implications of this MTW activity? Decrease expenditures
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes This a standard waiver, has not been rejected by MTW Agency.
Does the MTW activity require a hardship policy? No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? N/A – 1 <sup>st</sup> year of submission
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>Received <u>0</u> hardship requests</li> <li>Approved <u>0</u> hardship requests</li> <li>Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? Yes, it does, however, the form for an impact analysis is on the HIP portal and not available at this time
Does the impact analysis apply to more than this MTW activity? Yes The attached impact analysis applies to: <ul style="list-style-type: none"> <li>1 f. – Minimum Rent (HCV)</li> <li>1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV)</li> <li>1 o. – Initial Rent Burden (HCV)</li> <li>1 q. – Imputed Income (HCV)</li> <li>1 s. – Elimination of Deduction(s) (HCV)</li> <li>2 a. – Payment Standards – Small Area Fair Market Rents (HCV)</li> <li>3 b. – Alternative Reexamination Schedule for Households (HCV)</li> <li>12 b. – Work Requirements (HCV)</li> </ul> Initial rent burden increased from 40% to 50% to allow higher success with leasing.

C. 3 Reexaminations

<b>3.b. – Alternative Reexamination Schedule for Households (PH &amp; HCV)</b>
All households will have reexaminations for the effective date of January 1, 2026. All families with only a fixed income source will be required to complete annual reexamination paperwork and interviews on the 3-year exam period. These families will still have a reexamination provided to HUD with any increases that may occur for fixed incomes, such as social security, however, the family will not need to provide any additional information with the Housing Authority using the EIV documents for those types of increases. All other working or non – working families will still be interviewed annually, unless the Housing Authority deems it unnecessary. No interim reexaminations will occur unless rent increases requested by the landlord, adding a household member, removing a household member, or changes that occur due to a hardship. This will fall in line with the HOTMA proposed rule also.
Which MTW statutory objective does this MTW activity serve? Cost effectiveness
What are the cost implications of this MTW activity? Minimal and annual changes only, cost savings and time for agency and tenants.
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes The waiver request is being submitted for review with this submission of the MTW Supplement
Does the MTW activity require a hardship policy? Yes
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? There have been no modifications to the hardship policy.
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? Yes, however the Impact analysis form not available from the HIP portal at this time.

<b>3. d. – Self Certification of Assets (HCV)</b>
At the time of annual recertification, tenants will be allowed to complete a self-certification of assets if they declare that their total asset value is less than \$50,000 (this was changed due to the upcoming HOTMA program). This will reduce the amount of documentation tenants will have to submit when they are completing their annual recertification. It will also decrease the administrative burden for HCV staff when income from assets cause very little impact to the HAP paid on behalf of tenants. For the January 1, 2025 annual reexaminations, which were the first to allow self-certification of assets, this policy reduced the administrative burden for the Housing Authority and reduced some of the paperwork burden for the clients.
Which MTW statutory objective does this MTW activity serve? Cost effectiveness
What are the cost implications of this MTW activity? Neutral (no cost implications)
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes

The waiver request is being submitted for review with this submission of the MTW Supplement
Does the MTW activity require a hardship policy? No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? N/A – 1 <sup>st</sup> year of submission
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>Received <u>0</u> hardship requests</li> <li>Approved <u>0</u> hardship requests</li> <li>Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? No
Families will be allowed to complete a Self-Certification of Assets if they declare that the total asset value is less than \$50,000.

<b>4. c. – Other Landlord Incentives (HCV)</b>
To increase leasing options for HCV participants, the Housing Authority will pay \$500.00 incentive for household leased with a voucher. There have been 54 payments since 1/1/2024. Currently there are over 19 apartment complexes and a multitude of private owners and realty companies that refuse to accept tenants with voucher assistance. The Housing Authority will also pay a \$200.00 incentive for every landlord who refers a new landlord to the program who leases an HCV participant. By providing this incentive, the Housing Authority of Fort Mill hopes to increase landlord participation and to open new leasing opportunities to the voucher program participants. The new landlord referral has not come to fruition, but hopefully in the coming year. Since the policy was implemented, a total of \$27,000.00 has been issued in landlord incentives.
Which MTW statutory objective does this MTW activity serve? Housing Choice
What are the cost implications of this MTW activity? Increase expenditures
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes The waiver request was not rejected during the submission year, and is a standard waiver.
Does the MTW activity require a hardship policy? No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement? No modifications to the Hardship policy have occurred in the first year.

<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p> <p>In the prior year, with this activity, the Housing Authority of Fort Mill:</p> <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> <p>There is / are <u>0</u> hardship request pending</p>
<p>Does this MTW activity require an impact analysis?</p> <p>No</p>
<p>Does this policy apply to all HCV units or only certain unit types?</p> <p>This policy applies to all units.</p>
<p>What is the maximum payment that can be made to a landlord under this policy?</p> <p>Maximum payment to landlord for incentive is \$500.00 per new leasing. Maximum payment to landlord for referral is \$200.00 per new leasing.</p>
<p>How many payments were issued under this policy in the most recently completed PHA fiscal year?</p> <p>26 payments were issued under this policy in the most recently completed PHA fiscal year.</p>
<p>What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?</p> <p>\$13,000.00 issued under this policy in the most recently completed PHA fiscal year.</p>

<p><b>5. d. – Alternative Inspection Schedule (HCV)</b></p>
<p>The agency is conducting regular inspection on a biennial basis, unless requested otherwise by either the tenant or the landlord. This has reduced the number of inspections completed each month by the HCV Inspector has been reduced from 15-20 to 7-10, allowing more time to ensure files and income calculations are correct. This also allows more time for the creation of a local self-sufficiency program in advance of the work requirements taking effect for the all non-elderly, non-disabled households/ For annual inspections, landlords will be allowed to self-certify that the repairs are made. The tenants must also sign the certification agreeing that all repairs have been made. If the tenant disagrees, a physical re-inspection will be scheduled. Units must still pass the initial inspection before a participant can lease the unit and physical re-inspections must be completed if a unit fails the initial inspection.</p>
<p>Which MTW statutory objective does this MTW activity serve?</p> <p>Cost effectiveness</p>
<p>What are the cost implications of this MTW activity?</p> <p>Decrease expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing?</p> <p>This MTW activity applies to all assisted households</p>
<p>Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</p> <p>This MTW activity applies to all new admissions and currently assisted households</p>
<p>Does this MTW activity apply to all family types or only to selected family types?</p> <p>This MTW activity applies to all family types</p>
<p>Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</p> <p>This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity?</p> <p>Yes</p> <p>The waiver request is being submitted for review with this submission of the MTW Supplement</p>
<p>Does the MTW activity require a hardship policy?</p> <p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p>

N/A – 1 <sup>st</sup> year of submission
How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year? In the prior year, with this activity, the Housing Authority of Fort Mill: <ul style="list-style-type: none"> <li>Received <u>0</u> hardship requests</li> <li>Approved <u>0</u> hardship requests</li> <li>Denied <u>0</u> hardship requests</li> </ul> There is / are <u>0</u> hardship request pending
Does this MTW activity require an impact analysis? No
Regular inspections will be conducted on a biennial basis, unless requested differently by the tenant or the landlord. Landlords will be able to self-certify repairs completed from these regular inspections if the tenant signs the certification form agreeing that the repair has been done. No changes will be made to the requirement surrounding initial inspections.

<b>12. b. – Work Requirement (HCV)</b>
The Housing Authority will begin work requirements beginning January 1, 2029, for all non-elderly/ non-disabled households. At that time each non-elderly/ non-disabled household will be required to have a least one adult member who is employed an average of 30 hours or more each week. To assist clients in securing and maintaining employment, the Housing Authority will partner with the Department of Social Services and local educational facilities to provide support. The Housing Authority will also assess the ability to provide homeownership classes and other classes to assist participants in self-sufficiency.  Beginning January 1, 2024, all non-elderly/ non-disabled households who wish to move to the Housing Authority's jurisdiction through portability are required to have an adult member who is employed and working an average of 30 hours per week or their request to transfer will be denied and the portability paperwork will be returned to the Initial PHA.
Which MTW statutory objective does this MTW activity serve? Self-sufficiency
What are the cost implications of this MTW activity? Decrease expenditures
Does the MTW activity under this waiver apply to all assisted households or only a subset or subsets of assisted housing? This MTW activity applies to all assisted households
Does this MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households? This MTW activity applies to all new admissions and currently assisted households
Does this MTW activity apply to all family types or only to selected family types? This MTW activity applies to all family types
Does this MTW activity apply to all HCV tenant-based units and properties with project-based vouchers? This MTW activity applies to all tenant-based units. The Housing Authority of Fort Mill does not currently have any project-based vouchers.
Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity? Yes The waiver request is being submitted for review with this submission of the MTW Supplement
Does the MTW activity require a hardship policy? Yes
Does the hardship policy apply to more than this MTW activity? Yes

<p>The attached hardship policy applies to:</p> <p>1 f. – Minimum Rent (HCV)</p> <p>1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV)</p> <p>1 q. – Imputed Income (HCV)</p> <p>1 s. – Elimination of Deductions (HCV)</p> <p>2 b. – Payment Standards – Small Area Fair Market Rents (HCV)</p> <p>3 b. – Alternative Reexamination Schedule for Households (HCV)</p> <p>12 b. – Work Requirements (HCV)</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No modifications to the hardship policy have been done.</p>
<p>How many hardship requests have been received associated with this activity in the most recently completed PHA fiscal year?</p> <p>In the prior year, with this activity, the Housing Authority of Fort Mill:</p> <ul style="list-style-type: none"> <li>• Received <u>0</u> hardship requests</li> <li>• Approved <u>0</u> hardship requests</li> <li>• Denied <u>0</u> hardship requests</li> </ul> <p>There is / are <u>0</u> hardship request pending</p>
<p>Does this MTW activity require an impact analysis?</p> <p>Yes however there is no impact analysis form available from the HIP Portal at this time.</p>
<p>Does the impact analysis apply to more than this MTW activity?</p> <p>Yes</p> <p>The attached impact analysis applies to:</p> <p>1 f. – Minimum Rent (HCV)</p> <p>1 h. – Total Tenant Payment as a Percentage of Gross Income (HCV)</p> <p>1 o. – Initial Rent Burden (HCV)</p> <p>1 q. – Imputed Income (HCV)</p> <p>1 s. – Elimination of Deduction(s) (HCV)</p> <p>2 a. – Payment Standards – Small Area Fair Market Rents (HCV)</p> <p>3 b. – Alternative Reexamination Schedule for Households (HCV)</p> <p>12 b. – Work Requirements (HCV)</p>
<p>All current participants, a work requirement will be started January 1, 2029, in for all non-elderly/non-disabled households, requiring one adult household member to be employed at least 30 hours a week or more. Currently, all non-elderly/non-disabled households seeking to move into the Housing Authority’s jurisdiction under portability must have an adult member who is employed 30 or more hours per week, or their portability will be denied and the paperwork returned to the Initial PHA.</p>
<p>Does the work requirement MTW activity exempt any type of households or individuals other those required to be excluded through the MTW Operations Notice or those excluded as a reasonable accommodation?</p> <p>All elderly/disabled families will be exempt from the work requirement.</p>
<p>What counts as “work” under the work requirement MTW activity?</p> <ul style="list-style-type: none"> <li>Employment</li> <li>Attending school on a full-time basis</li> <li>Participation in a work training program through a local social service agency (ie. Department of Social Services)</li> </ul>
<p>How will the MTW agency monitor compliance with the work requirement MTW activity?</p> <p>Compliance with the work requirement MTW activity will be tracked using the SACS housing software</p>
<p>What supportive services are offered to support households to comply with the work requirement?</p> <p>The Housing Authority will work with local social service agencies, like the Department of Labor and Workforce and the Department of Social Services to provide job listings, job training skills, and more. The Housing Authority will also assess the ability to offer home buyer education and budgeting classes. Participants will be assessed to see what partnerships and support services will be most beneficial to them.</p>

<p>How does the agency address noncompliance with the work requirement policy?          Noncompliance with the work requirement policy will be addressed through termination of participation for the family with appropriate advance notice and the right to hearing through the agency's grievance policy.</p>
<p>How many households are currently subject to the policy?          All households that are not classified as elderly / disabled will eventual be subject to a work requirement. However, at this time, the work hours are zero for current residents, which will increase January 1, 2029 to 30 hours per week per household.</p>
<p>How many households in the most recently completed PHA fiscal year were sanctioned for non-compliance with the work requirement.          0 households were sanctioned for non-compliance with the work requirement in the most recently completed PHA fiscal year.</p>

<b>D.</b>	<b>Safe Harbor Waivers</b>
<b>D.1</b>	<b>Safe Harbor Waivers seeking HUD Approval:</b> No Safe Harbor Waivers are being requested.

<b>E.</b>	<b>Agency-Specific Waiver(s)</b>
<b>E.1</b>	<b>Agency-Specific Waiver(s) for HUD Approval:</b> 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, Agency-Specific Waivers may be requested.  No Agency-Specific Waivers are being requested.
<b>E.2</b>	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b> MTW Agency does not have approved Agency-Specific Waivers.

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting</b>
<b>F.1</b>	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursements, 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

<b>G.</b>	<b>MTW Statutory Requirements</b>
<b>G.1</b>	<p><b>75% Very Low Income – Local, Non-Traditional</b></p> <p>HUD will verify compliance with the statutory requirement that at least 75% of the household assisted by the MTW agency are very low-income for MTW public housing units and MTW HCV's through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.</p>

<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80% - 50% Area Median Income	
49% - 30% Area Median Income	2
Below 30% Area Median Income	5
<b>Total Local, Non-Traditional Households</b>	

\*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.

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

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional</b>
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:

<b>Property Name/ Address</b>	<b>0/1 BR</b>	<b>2 BR</b>	<b>3 BR</b>	<b>4 BR</b>	<b>5 BR</b>	<b>6+ BR</b>	<b>Total Units</b>	<b>Population Type*</b>	<b># of Section 504 Accessible (Mobility)**</b>	<b># of Section 504 Accessible (Hearing/ Vision)</b>	<b>Was this Property Made Available for Initial Occupancy during the Prior Full</b>	<b>What was the Total Amount of MTW Funds Invested</b>



## Impact Analysis

Activity

1.f. - Minimum Rent (HCV)  
Minimum Rent Increase to \$100.00

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any changes in the agency's per family contribution):

This activity is estimated to save the agency approximately \$200.00 per month in 2025. This is a minor impact to the agency's finances.

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

It is estimated that this activity will decrease the HAP paid on behalf of eight families by \$25.00 per household. This is a minor impact to the families served by the program.

3. Describe the impact on the agency's waitlist(s) (e.g., any changes in the amount of time families are on the waitlist):

This activity will not have an impact on the agency's waitlist.

4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):

This activity will not have an impact on the agency's termination rates of families.

5. Describe the impact of the agency's current occupancy level in public housing and utilization rate in the HCV program:

This activity will not have an impact on the utilization rate in the HCV program.

6. Describe the impact on meeting the MTW statutory goal of cost effectiveness, self-sufficiency, and/or housing choice:

This policy is expected to incentivize employment amongst the participants of the program. It will also simplify the process for the participants and casemanagers.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements:

This activity will not have an impact on the agency's ability to meet the MTW statutory requirements.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a results of this activity:

While it is possible that the number of hardship requests submitted will increase with this activity, there have been no hardship requests submitted due to this activity at this time.

9. Across the other factors above, describe any impact on protected classes (and any associated disparate impact):

This activity will not cause an impact on participants based on protected classes.

## Impact Analysis

Activity

1.h. Tenant Payment as a Modified Percentage of Income (HCV)

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any changes in the agency's per family contribution):

It is estimated, based on current participant data, that decreasing the percentage of income used to calculate TTP from 28% will increase the Agency's monthly HAP cost by \$2613.00. This is mitigated slightly by the decrease in HAP due to the minimum annual income set for all non-elderly/ non-disabled household increasing to \$7,540.00. With this mitigation, the increased monthly HAP cost is \$1582.00

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

The overall monthly cost for participants will decrease by \$1582.00 with this change. The average monthly savings per participant is \$10.40.

3. Describe the impact on the agency's waitlist(s) (e.g., any changes in the amount of time families are on the waitlist):

This activity will have no impact on the agency's waitlist.

4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):

This activity will have no impact on the agency's termination rate of families.

5. Describe the impact of the agency's current occupancy level in public housing and utilization rate in the HCV program:

It is believed that this activity will increase utilization rates because it will lower the family's payments and therefore allow more families to lease after being issued a voucher.

6. Describe the impact on meeting the MTW statutory goal of cost effectiveness, self-sufficiency, and/or housing choice:

This activity will help meet the MTW statutory goal of increasing self-sufficiency because the participant family will be paying less of their income as rent. This will allow them to save money for the future. It also encourages participants to become employed since less of their money will be used for rent.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements:

This activity will have no impact on the agency's ability to meet the MTW statutory requirements.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a results of this activity:

Since this activity is a benefit to the families served, this activity will have no impact on the rate of hardship requests or the number granted or denied

9. Across the other factors above, describe any impact on protected classes (and any associated disparate impact:

This activity will have no adverse impact on protected classes.

## Impact Analysis

Activity

1.o. Initial Rent Burden

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any changes in the agency's per family contribution):

In the Fort Mill jurisdiction, simply increasing the payment standards to 110% of the current Small Area Fair Market Rent might not be enough to increase housing choice for the families on the voucher program. This also has a significant impact on the agency's monthly budget. One way to increase housing choice further without increased cost to the agency is to allow families to lease at units where the gross rent goes up to 50% of the family's monthly adjusted income. This activity will have no impact on the agency's finances.

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

This activity may increase cost for our participant; however, at this time, no family has leased at the higher rent burden percentage. All families currently leased have their household cost at or below 40% of their monthly adjusted incomes. It is not sure if this is because families do not want to pay more of the rent at the initial move in or if the opportunity for a family to lease a unit at the higher rent burden just has not arisen. It is the agency's hope that this will help increase the number of families who lease.

3. Describe the impact on the agency's waitlist(s) (e.g., any changes in the amount of time families are on the waitlist):

This activity will have no impact on the agency's waitlist.

4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):

This activity will have no impact on the agency's termination rate of families.

5. Describe the impact of the agency's current occupancy level in public housing and utilization rate in the HCV program:

This activity should increase the agency's voucher utilization rates as it will allow more of the units in the area to be affordable for the families looking to lease with vouchers. Currently, the agency's utilization rate is below 25%. While the agency is intending to increase the payment standards to the maximum percentage of the Small Area Fair Market Rents allowable, this might not be enough to increase the utilization rate. This will allow families to look at units with higher rental rates without further negative impact to the agency's funding.

6. Describe the impact on meeting the MTW statutory goal of cost effectiveness, self-sufficiency, and/or housing choice:

This activity should increase housing choice as it allows families to lease units where the rents might be further above the payment standards.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements:

This activity will have no impact on the agency's ability to meet the MTW statutory requirements.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a results of this activity:

It is not believed that this activity will increase the number of hardship requests or the number granted or denied since it will be each family's choice to lease a unit where they will be paying a higher initial rent burden.

9. Across the other factors above, describe any impact on protected classes (and any associated disparate impact):

This activity should have no negative impact on any protected classes.

## Impact Analysis

Activity

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

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any changes in the agency's per family contribution):

This activity will decrease the agency's cost by streamlining the annual recertification process for all fixed-income families who will only have to complete annual recertification paperwork and interviews every three years. This will decrease the amount of time that agency's staff spend completing these tasks. The staff can therefore focus on increasing landlord participation and setting up community partnerships to assist tenant's with self-sufficiency. The agency will also continue to only complete interim recertifications for certain reasons, including rent increase requested by the owner, adding or removing household members, and decreases in income due to hardship.

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

This activity will have no impact on the affordability of housing costs for affected families.

3. Describe the impact on the agency's waitlist(s) (e.g., any changes in the amount of time families are on the waitlist):

This activity will have no impact on the agency's waitlist.

4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):

This activity will have no impact on the agency's termination rate of families.

5. Describe the impact of the agency's current occupancy level in public housing and utilization rate in the HCV program:

This activity will have no impact on the agency's utilization rate.

6. Describe the impact on meeting the MTW statutory goal of cost effectiveness, self-sufficiency, and/or housing choice:

This activity will assist the agency in meeting the MTW statutory goal of cost effectiveness as it decreases the amount of work that will need to be done ever year at the time of annual recertification. It also opens up time for the agency's staff to conduct landlord outreach; therefore, hopefully increasing housing choice. Since interim changes are not completed when the family's income increases, it encourages participants to save for their future and assist with self-sufficiency efforts.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements:

This activity will have no impact on the agency's ability to meet the MTW statutory requirements.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a results of this activity:

This activity will have no impact on the rate of hardship requests or the number granted or denied

9. Across the other factors above, describe any impact on protected classes (and any associated disparate impact:

This activity will have no adverse impact on protected classes.

## Impact Analysis

Activity

12.b. Work Requirements

1. Describe the activity's impact on the agency's finances (e.g., how much will the activity cost, any changes in the agency's per family contribution):

Currently, the only work requirement instituted by the agency at this time is that all incoming portability clients must be working or have an offer of work at 30+ hours per week, with elderly/disabled households being exempt. This is a cost saving measure for the agency. Incoming portability clients who do not have employment are less likely to be able to locate affordable housing in Fort Mill. In most cases, the work is done to issue the voucher to the portability client but no administrative fee is ever recouped for the cost since these families are less likely to lease an approved unit on the program. If the incoming portability client does not have employment, the agency is also paying a higher monthly HAP on behalf of the client. If the monthly cost per family can be reduced, then more families can be served by the program. The work requirement for the whole voucher program will be put into place in the future.

2. Describe the activity's impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs):

This activity should have little impact on the affordability of housing cost except in that the more income a family has, the more likely they are to be able to lease an affordable unit in the area.

3. Describe the impact on the agency's waitlist(s) (e.g., any changes in the amount of time families are on the waitlist):

This activity will have no impact on the agency's waitlist.

4. Describe the impact on the agency's termination rate of families (e.g., any change in the rate at which families non-voluntarily lose assistance from the agency):

This activity will have no impact on the agency's termination rate of families.

5. Describe the impact of the agency's current occupancy level in public housing and utilization rate in the HCV program:

This activity will have no impact on the agency's utilization rate except that the more income a family has, the more likely they are to be successful in finding a unit to lease with the voucher.

6. Describe the impact on meeting the MTW statutory goal of cost effectiveness, self-sufficiency, and/or housing choice:

This activity has an impact on meeting the MTW statutory goal of cost saving since a lower per family cost means more families can be housed. This also has an impact on meeting the goal of self-sufficiency since participants are required to be employed before their voucher can be accepted by the agency.

7. Describe the impact on the agency's ability to meet the MTW statutory requirements:

This activity will have no impact on the agency's ability to meet the MTW statutory requirements.

8. Describe the impact on the rate of hardship requests and the number granted and denied as a results of this activity:

This activity should have little to no impact on the number of hardship request received, granted, or denied by the agency.

9. Across the other factors above, describe any impact on protected classes (and any associated disparate impact:

This activity will have no negative impact on any protected classes.

## Hardship Policy

The Housing Authority of Fort Mill has instituted the following hardship policy for the following MTW Activities:

- Minimum Rent.

Effective January 1, 2025, the Fort Mill Housing Authority has set the minimum rent as \$100.00. However, if the family requests a hardship exemption, the Fort Mill Housing Authority will suspend the minimum rent for the family beginning the month following the family's hardship request. The suspension will continue until the Housing Authority can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to pay a minimum rent, and the Housing Assistance Payment will be increased accordingly.

- Total Tenant Payment as a Percentage of Gross Income (HCV)

Since the percentage of income used to calculate the TTP for each participant household is being lowered, this will reduce the cost for the family. Since this rule is beneficial to the families, hardship request should not be needed for this activity. However, it is required and is therefore included in this policy.

- Alternative Reexamination Schedule for Households

Since this activity reduces the number of annual recertifications completed by the agency, no hardship request should be needed for this activity. However, most hardship requests have been and will continue to be requested to have an interim reexamination done when a household's income decreases between annual reexaminations. Since January 1, 2025, fourteen hardship requests have been submitted to allow an interim reexamination to be completed due to a decrease in the household income.

- Work Requirements

Currently, there is no work requirement in place for program participants, just for incoming portability clients. Therefore, it is not expected that the agency will receive many hardship requests at this time due to this activity. This will increase when the work requirements are put into place in year 5. This hardship policy does apply to all families who are actively trying to comply with the agency's work requirements but are having difficulties obtaining work or an acceptable substitute. If the hardship is requested, the agency may require documentation from the client showing that they are trying to comply with the agency's work requirements to qualify for the hardship exemption.

Hardship requests must be submitted in writing to the agency. Each request will be individually reviewed, and a decision will be made in each circumstance based on the criteria below:

1. A hardship exists in the following circumstances:
  - a. When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program including a family that includes a member who is a non-citizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for title IV of the Personal Responsibility and Work Opportunity Act of 1996;
  - b. When the family would be evicted because it is unable to pay the minimum rent;
  - c. When the income of the family has decreased because of changed circumstances, including loss of employment; and
  - d. When a death has occurred in the family.
  - e. A family is in threat of being terminated from the program for failure to meet the agency's work requirements despite actively trying to comply with such requirements. Documentation may be required to show efforts to comply with the work requirements.
2. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent to the Housing Authority for the time of suspension.
3. Temporary hardship. If the Housing Authority determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 calendar days from the month following the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a reasonable repayment agreement for any minimum rent back payment paid by the Housing Authority on the family's behalf during the period of suspension.
4. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
5. Appeals. The family may use the informal hearing procedure to appeal to the Housing Authority's determination regarding the hardship. No escrow deposit will be required to access the informal hearing procedures.