

PHA Name : Housing Authority Of Spartanburg

PHA Code : SC003

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 10/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Spartanburg Housing is the fourth largest housing authority in South Carolina and serves over 6,500 residents within Spartanburg County. Our vision continues to surround improving the quality of life through housing by enhancing economic mobility for the families we serve, strengthening communities, and creating strategic partnerships. In collaboration with our community partners, Spartanburg Housing will support families as they move toward self-sufficiency. Spartanburg Housing will use the public housing and housing choice voucher funding flexibility to best meet the local need and implement our initiatives. Spartanburg Housing would like to use MTW flexibility to help address economic mobility. The families we serve often have the fewest opportunities to move up the economic ladder. We will work with our community partners to provide more targeted education and workforce preparation and collaborate to help families gain greater mobility.

Spartanburg Housing has focused on implementing landlord incentives (Damage Claims, Vacancy Loss Payments, and Other Landlord Incentives). These initiatives will address cost effectiveness by increasing utilization; self-sufficiency by providing incentives for new landlords and increase the number of families that are able to find suitable housing; and housing choice by expanding the number of available housing options for voucher holders. We now plan to implement bi-annual recertifications for all households in which all members of the household are 62 and older or the Head of Household, Co-Head or Spouse is disabled for the public housing and housing choice voucher programs. In addition, we will eliminate utility reimbursements for the public housing and housing choice voucher programs.

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

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Plan to Implement in the Submission Year
n. Utility Reimbursements (HCV)	Plan to Implement in the Submission Year
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)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
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)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Plan to Implement in the Submission Year
b. Alternative Reexamination Schedule for Households (HCV)	Plan to Implement in the Submission Year
c. Self-Certification of Assets (PH)	Not Currently Implemented
d. Self-Certification of Assets (HCV)	Not Currently Implemented
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)	Not Currently Implemented
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
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)	Not Currently Implemented
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)	Not Currently Implemented
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
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)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
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)	Not Currently Implemented
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. Housing Development Programs	Not Currently Implemented

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

1.m. - Utility Reimbursements (PH)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Spartanburg Housing plans to eliminate utility reimbursements to reduce costs while achieving greater cost effectiveness in expenditures and encouraging family self-sufficiency. The waiver would result in cost savings and a reduction in administrative burdens. It will also help to ensure that residents are contributing towards their rental payment or at minimum not receiving a payment for receiving assistance from Spartanburg Housing. We will eliminate the utility reimbursement by doing the following. If a utility allowance is greater than the total tenant payment, the tenant rent will be zero (\$0) and no utility reimbursement will be provided to the tenant.</p> <p>For FY 2023 the department paid a total of \$1999.00 to a total of 2 families at Cambridge Place. The average URP check was \$133.26. Add in the cost of processing the URP check and the total amount paid out for FY 2023 for utility reimbursement is \$2017.15.</p> <p>For FY 2023 the department paid a total of \$1009.00 to a total of 20 families at Prince Hall Apartments. The average URP check was \$8.27. Add in the cost of processing the URP check and the total amount paid out for FY 2023 for utility reimbursement is \$1156.62.</p> <p>We will begin implement this change in phases starting no earlier than June 1, 2024.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Cost effectiveness; Self-sufficiency</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Decreased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>Not applicable</p>

1.n. - Utility Reimbursements (HCV)
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>Spartanburg Housing plans to eliminate utility reimbursements to reduce costs while achieving greater cost effectiveness in expenditures and encouraging family self-sufficiency. The waiver would result in cost savings and a reduction in administrative burdens. It will also help to ensure that residents are contributing towards their rental payment or at minimum not receiving a payment for receiving assistance from Spartanburg Housing. We will eliminate the utility reimbursement by doing the following. If a utility allowance is greater than the total tenant payment, the tenant rent will be zero (\$0) and no utility reimbursement will be provided to the tenant.</p> <p>For FY 2023 the department paid a total of \$606,001 to a total of 475 families. The average URP check was \$102.79. Add in the cost of processing the URP check and the total amount paid out for FY 2023 for utility reimbursement is \$610,561.</p>

Taking the current Price Per Unit (PUC) into account of \$568, if we eliminated the utility reimbursement we could help close to 90 more families find housing.

We will implement this change starting June 1, 2024.

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 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.

Not Applicable

3.a. - Alternative Reexamination Schedule for Households (PH)

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

Spartanburg Housing will implement bi-annual recertifications for all households in which all members of the household are 62 and older or the Head of Household, Co-Head or Spouse is disabled, even if the household members have earned income, they will be recertified only on a bi-annual basis. To achieve the highest level of operational efficiency, Spartanburg Housing will stagger the implementation of this activity. All certifications will be completed in 2024, however we will start staggering in February 2024 and do the even months for the year of 2024 making their next recertification due in 2026. In January of 2025 we will complete the odd month recertifications, making their next recertification due in 2027.

2024 Recertification

Jan 2024 (Next Reexam Jan 2025)

Feb 2024 (Feb 2026)

Mar 2024 (Mar 2025)

Apr 2024 (April 2026)

May 2024 (May 2025)

Jun 2024 (Jun 2026)

Jul 2024 (Jul 2025)

Aug 2024 (Aug 2026)

Sep 2024 (Sep 2025)

Oct 2024 (Oct 2026)

Nov 2024 (Nov 2025)

Dec 2024 (Dec 2026)

For all households, including those listed above:

Interim recertifications for decreases in income will be limited to \$200 per month or more. Reductions in income of less than \$200 per month are required to be reported, but no interim recertification will be completed.

Interim recertifications for increases of income will be limited to a change of \$500 or more per month. Increases in income of less than \$500 per month are required to be reported, but no interim will be completed.

All other households and family types will recertify annually.

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.

Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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.

Not Applicable

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.r. - Elimination of Deduction(s) (PH)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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 is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

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

For all households, including those listed above:

Interim recertifications for decreases in income will be conducted in accordance with Spartanburg Housing Policy.

Interim recertifications for increases of income will be limited to a change of \$500 or more per month. Increases in income of less than \$500 per month are required to be reported, but no interim will be completed.

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

Spartanburg Housing will implement bi-annual recertifications for all households in which all members of the household are 62 and older or the Head of Household, Co-Head or Spouse is disabled, even if the household members have earned income, they will be recertified only on a bi-annual basis. To achieve the highest level of operational efficiency, Spartanburg Housing will stagger the implementation of this activity. All certifications will be completed in 2024, however we will start staggering in February 2024 and do the even months for the year of 2024 making their next recertification due in 2026. In January of 2025 we will complete the odd month recertifications, making their next recertification due in 2027.

2024 Recertification

Jan 2024 (Next Reexam Jan 2025)

Feb 2024 (Feb 2026)

Mar 2024 (Mar 2025)

Apr 2024 (April 2026)

May 2024 (May 2025)

Jun 2024 (Jun 2026)

Jul 2024 (Jul 2025)

Aug 2024 (Aug 2026)

Sep 2024 (Sep 2025)

Oct 2024 (Oct 2026)

Nov 2024 (Nov 2025)

Dec 2024 (Dec 2026)

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.
Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)
Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?
The MTW activity applies to all tenant-based units
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.
Not Applicable
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.s. - Elimination of Deduction(s) (HCV)
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No
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 is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

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

For all households, including those listed above:

Interim recertifications for decreases in income will be conducted in accordance with Spartanburg Housing Policy.

Interim recertifications for increases of income will be limited to a change of \$500 or more per month. Increases in income of less than \$500 per month are required to be reported, but no interim will be completed.

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

Spartanburg Housing provides landlords with a payment of \$500 when an HCV participant moves out and the landlord rents the unit to another HCV participant. If the landlord chooses not to rent the unit to another HCV participant, they would forfeit this payment.

This would apply to all HCV units and landlords. This would not apply to PBV properties or landlords.

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 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 to all family types

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

The MTW activity applies to all tenant-based units

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 activity was implemented on June 1, 2023. There has been one (1) payment for vacancy loss.

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?
\$500
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?
\$150

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
Spartanburg Housing will provide landlords with up to \$1250 for damages caused by an HCV participant. Given the following steps have been followed: 1) Move In inspection completed and signed off by both the landlord and HCV participant 2) Move out inspection completed and signed off by both landlord and HCV participant 3) Itemized list of repairs and estimated cost to repair provided to Spartanburg Housing turned in within 15 days of move out of HCV participant 4) Established a reasonable cost of repairs This would apply to all HCV and PBV landlords.
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.
The activity was implemented on June 1, 2023. There has been one (1) payment for damage claims.
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?
\$1250
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?
\$632

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
<p>1) Sign-On Bonus: Spartanburg Housing will provide each new landlord with a one-time \$250 sign on bonus. This bonus would be given to the new landlord after lease up of the first unit. This money would be directly deposited with their first Housing Assistance Payment. This would apply to new HCV landlords only. This would not apply to PBV landlords. 2) Landlord Referral Bonus: Participating landlords, who refers a new landlord to Spartanburg Housing, would receive \$100 bonus after the first unit is leased with the new landlord. This payment would be sent electronically to the participating landlord with their next Housing Assistance Payment. This would apply to existing HCV landlords only. This would not apply to PBV landlords. 3) Other Incentives: Spartanburg Housing will give each existing landlord a monetary award for every 5 years they have been with Spartanburg Housing. The maximum award amount is \$100 per every 5 years.</p> <p>This would apply to HCV landlords only.</p>
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.
<p>The incentives were implemented on June 1, 2023. Below are the payments for fiscal year end 2023.</p> <p>13 Sign On Bonus Payment-Total \$6,500 72 5-Year Tenure Bonus-Total \$7,200 112 10-Year Tenure Bonus-Total \$22,400</p>
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?)

Certain types of units only

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

\$500 is the maximum payment...for each new landlord referral.

Referral Bonus: The maximum payment is \$100.

Other Incentives: The maximum payment is \$100.

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

197

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

\$36,100

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

Spartanburg Housing will perform HQS inspections on PBV units that it owns, manages, and/or controls. The Director of Leased Housing will randomly select a sample of Quality Control inspections (5%) that have been completed within a 60-day period.

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.

This is an approved activity that has not been implemented.

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

- 1) The inspections for the last 60 days will be downloaded from the Yardi system into an Excel worksheet where the number of inspections can be determined.
- 2) The number of inspections will be multiplied by 5% to determine the number of inspections that will need to be performed. We will round up in all cases.
- 3) We will use a random generator to select the number of the inspections to select to complete based on the number needed to complete the 5% of inspections.

- 4) We will send letters to the landlords and tenants to schedule the inspections.
- 5) The inspections will be completed and re-inspections will be scheduled if necessary.
- 6) Copies of the inspections will be kept in a separate files.

If [Upload file] options- Display 'Attached for quality assurance method'

No document is attached.

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

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

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

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

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2024	\$0	\$0	\$0	
2023	\$1,934,803	\$1,399,052	\$585,751	2023-12-31
2022	\$1,777,715	\$1,326,973	\$0	2022-12-31

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	
	49%-30% Area Median Income	
	Below 30% Area Median Income	
	Total Local, Non-Traditional Households	0

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

G.2	Establishing Reasonable Rent Policy.
<p>Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? No</p> <p>Please describe the MTW agency's plans for its future rent reform activity and the implementation timeline.</p>	

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

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.
----	--------------

No known evaluations.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (10/01/2023 _____), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Spartanburg Housing

SC003

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

John O. Fairey, Jr.

Chair

NAME OF AUTHORIZED OFFICIAL

TITLE


SIGNATURE

12/28/2023

DATE

*** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

Instructions for Preparing Chapter 6: Income and Rent Determinations

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

The regulations governing financial hardship exemptions from minimum rent apply only to PHAs that establish a minimum rent greater than \$0 (see section 6-III.A). Hence the first decision point concerns this choice.



Decision Point: Did the PHA establish a minimum rent greater than \$0?
(Model ACOP, p. 6-50)



Option 1: No. Leave the first paragraph of the model ACOP in place, as shown below, and ignore the rest of the material in section 6-III.B. No changes to the model ACOP are needed.

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.



Option 2: No. Delete the words “described below” from the first paragraph of the model ACOP and all of the text in section 6-III.B of the model ACOP following the first paragraph.



Option 3: Yes. Delete the policy of the model ACOP and continue.

Overview

The financial hardship exemption applies only to the payment of the minimum rent and not to a family’s inability to pay based upon other elements of the TTP formula. HUD identifies four types of hardship in the regulations and permits the PHA to add other hardship criteria.

When a family requests a financial hardship exemption, the steps required by the regulations depend on whether the PHA determines that the request is valid and whether the hardship will be temporary or long-term. HUD’s requirements and PHA decision points are described below.

Instructions for Preparing Chapter 6: Income and Rent Determinations

HUD-Defined Financial Hardship

HUD-defined hardships specified in 24 CFR 5.630(b) include:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen 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.

The ACOP should clarify:

- What distinctions, if any, will be made in the treatment of families who have lost eligibility, been denied eligibility, or are awaiting an eligibility determination
- How the end of a hardship will be determined
- Whether families who have lost eligibility as a result of fraud will be permitted to receive a hardship exemption



Decision Point: How will the PHA implement HUD's mandatory hardship criteria related to families who have lost or are awaiting federal, state, or local assistance? (Model ACOP, p. 6-50)



Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.



Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

Instructions for Preparing Chapter 6: Income and Rent Determinations

(2) The family would be evicted because it is unable to pay the minimum rent.



Decision Point: How will the PHA implement HUD's mandatory hardship criteria related to families who may be evicted? (Model ACOP, p. 6-50)



Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent or tenant-paid utilities.



Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

(3) Family income has decreased because of changed family circumstances, including the loss of employment.

No PHA policy decisions are required.

Instructions for Preparing Chapter 6: Income and Rent Determinations

(4) A death has occurred in the family.



Decision Point: How will the PHA implement HUD's mandatory hardship criteria related to a death in the family? (Model ACOP, p. 6-51)

Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

(5) The family has experienced other circumstances determined by the PHA.

The PHA is permitted to establish additional hardship criteria.



Decision Point: Does the PHA wish to add any hardship criteria? (Model ACOP, p. 6-51)

Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

The PHA has not established any additional hardship criteria.

Option 2: Add PHA-developed criteria. Edit or delete the model ACOP language and insert the PHA's policy.

Instructions for Preparing Chapter 6: Income and Rent Determinations

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request. When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. To further explain this requirement, the model ACOP contains a chart that illustrates that the TTP is not automatically reduced to zero in hardship cases.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term. Since HUD does not define temporary or long term hardship, the PHA must decide what these terms mean. The model ACOP uses 90 days or less for its definition of temporary hardship because the PHA may not evict the family for nonpayment of minimum rent for 90 days.

Decision Point: How will the PHA define temporary and long term hardships?
(Model ACOP, p. 6-52)

- Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days.

- Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.*

The regulation is silent on submission requirements and only requires that the PHA make its determination "promptly" [24 CFR 5.630(b)(2)(i)(B)]. The model ACOP specifies family submission requirements and requires the PHA to make a decision within 30 days of the family's request.

Decision Point: What requirements will the PHA impose for the family's submission and how soon will the PHA make a decision? (Model ACOP, p. 6-52)

- Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

- Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.*

Instructions for Preparing Chapter 6: Income and Rent Determinations

No Financial Hardship

The regulation requires that if there is no financial hardship, the PHA must reinstate the minimum rent and require the family to repay the amounts suspended on terms and conditions set by the PHA [24 CFR 5.630(b)(2)(iii)(A)].

Decision Point: How long will the PHA give a family to repay suspended rent if the family does not qualify for a hardship suspension or exemption? (Model ACOP, p. 6-53)

Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must reinstate the minimum rent from the beginning of the first of the month following the date of the family's request for a hardship exemption.

The family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship. The model ACOP permits the PHA and the family to agree on a repayment schedule in accordance with the PHA's policy.

Decision Point: How will the PHA require the family to repay amounts suspended for a temporary hardship? (Model ACOP, p. 6-53)

Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

The PHA will enter into a repayment agreement in accordance with the PHA's repayment policy.

Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

Instructions for Preparing Chapter 6: Income and Rent Determinations

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. Repayment of the minimum rent for the period of the long-term hardship is not required.

The model ACOP specifies when the hardship ends. The policy addresses hardships based upon loss of income and hardship-related expenses.



**Decision Point: How will the PHA determine when a long-term hardship has ended?
(Model ACOP, p. 6-54)**



Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.



Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA's policy.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

PHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the family share is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen 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.

Spartanburg Housing Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

Spartanburg Housing Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent to the owner or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.

(4) A death has occurred in the family.

Spartanburg Housing Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

(5) The family has experienced other circumstances determined by the PHA.

Spartanburg Housing Policy

Spartanburg Housing has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

Spartanburg Housing Policy

Spartanburg Housing defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$50.	
Family Share – No Hardship	Family Share – With Hardship
\$0 30% of monthly adjusted income	\$0 30% of monthly adjusted income
\$15 10% of monthly gross income	\$15 10% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$50 Minimum rent	\$50 Minimum rent
Minimum rent applies. TTP = \$50	Hardship exemption granted. TTP = \$15

Spartanburg Housing Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

Spartanburg Housing will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

Spartanburg Housing Policy

Spartanburg Housing will require the family to repay the suspended amount within 30 calendar days of Spartanburg Housing's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

Spartanburg Housing Policy

Spartanburg Housing will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of this plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

Spartanburg Housing Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

Impact Analysis: Bi-Annual Re-Examinations

1. Impact on Spartanburg Housing Finances

This activity is expected to have an impact on finances through a slight increase in per unit costs in the voucher program. Spartanburg Housing will offset these costs through savings that will result from reduced staff and administrative time.

2. Affordability of Housing Costs for affected families

This activity will positively impact affordability for families as rent increases will only take effect when income increases significantly. Families will have increased disposable income for other needs.

3. Wait List

This activity will have no impact on the wait list.

4. Termination Rate

This activity is not anticipated to impact the termination and/or eviction rate

5. Occupancy Level in Public Housing and Utilization Rate in HCV

This activity is not anticipated to impact occupancy or utilization rates

6. Meeting the MTW Goals of cost effectiveness, Self-Sufficiency, or Expanding Housing Choice

This activity will have a positive impact on meeting MTW goals as it will result in cost effectiveness for Spartanburg Housing and provide additional self-sufficiency initiatives for the elderly and disabled families as they have additional available income for one year without an increase in rent. There will be 890 HCV families and 214 PH families that will be affected by this change.

7. Impact on Spartanburg Housing ability to meet MTW Statutory Goals

This activity is not anticipated to impact Spartanburg Housing's ability to meet statutory goals.

8. Impact on Rate of Hardship Requests

This activity is not expected to impact the rate of hardship requests

9. Impact on Protected Classes and Associated Disparate Impact

This activity is not expected to impact any protected classes and will have not disparate impact.

Impact Analysis: Bi-Annual Re-Examinations

1. Impact on Spartanburg Housing Finances

This activity is expected to have an impact on finances through a slight increase in per unit costs in the voucher program. Spartanburg Housing will offset these costs through savings that will result from reduced staff and administrative time.

2. Affordability of Housing Costs for affected families

This activity will positively impact affordability for families as rent increases will only take effect when income increases significantly. Families will have increased disposable income for other needs.

3. Wait List

This activity will have no impact on the wait list.

4. Termination Rate

This activity is not anticipated to impact the termination and/or eviction rate

5. Occupancy Level in Public Housing and Utilization Rate in HCV

This activity is not anticipated to impact occupancy or utilization rates

6. Meeting the MTW Goals of cost effectiveness, Self-Sufficiency, or Expanding Housing Choice

This activity will have a positive impact on meeting MTW goals as it will result in cost effectiveness for Spartanburg Housing and provide additional self-sufficiency initiatives for the elderly and disabled families as they have additional available income for one year without an increase in rent. There will be 890 HCV families and 214 PH families that will be affected by this change.

7. Impact on Spartanburg Housing ability to meet MTW Statutory Goals

This activity is not anticipated to impact Spartanburg Housing's ability to meet statutory goals.

8. Impact on Rate of Hardship Requests

This activity is not expected to impact the rate of hardship requests

9. Impact on Protected Classes and Associated Disparate Impact

This activity is not expected to impact any protected classes and will have not disparate impact.

Public Hearing

Spartanburg Housing held a public hearing on Thursday, November 16, 2023 at 4:00pm. There were no attendees; therefore, no comments were provided.

Analysis of Public Comments

Spartanburg Housing held resident and participant meetings on the following dates:

October 25, 2023

November 9, 2023

November 14, 2023

November 20, 2023

November 21, 2023

A virtual public hearing was held on November 16, 2023. There were no attendees from the public.

The minutes have been included with this submission.

- In general, residents/participants that did not receive a utility reimbursement check wanted to know how someone can qualify to receive one.
- Staff addressed questions related to who would be impacted by the change to a biennial recertification process. Staff explained that this change applies to senior and disabled residents only.
- There was concern about the impact on residents when the reimbursements are eliminated. Staff addressed during the meetings.

Based on comments during the meetings with the residents, participants, and Board, Spartanburg Housing will implement the elimination of the utility reimbursements in phases to allow sufficient time for education and for residents to adjust to the change.

Wednesday October 25, 2023 10AM In Person and Virtual

In Person Attendance

Mimmie [REDACTED]
Jackie [REDACTED]
Dolores [REDACTED]
Louvencer [REDACTED]
Larisa [REDACTED]
Svetlana [REDACTED]
Olha [REDACTED]
Ivan & Lyubov [REDACTED]

Staff In Attendance

Teresa Moultrie
Meridith Vachon
Mia Parks
Carolyn Wofford
Callie Henline
Christy Godfrey
Vernon Beatty

Virtual Attendance

Lakeisha [REDACTED]
Shadai [REDACTED]
China [REDACTED]
Markeesha [REDACTED]
Tykvina [REDACTED]
Daniel [REDACTED]
Cheryl [REDACTED]
Bernita [REDACTED]

Staff In Attendance

Lanise Dillard
Crystal Moye

Questions Asked and Responses:

Utility Question – A participant asked how one would qualify for a utility check?

Teresa Moultrie explained how utility reimbursement works; if you pay zero rent you may be entitled to a utility check based on your income and unit and how many families are currently affected; roughly 400.

Recertification Question – A participant asked if the recertification changes will affect everyone?

Meridith Vachon explained that families who are not categorized as elderly/disabled will continue to recertify every year. Only elderly/disabled will change to every other year starting in 2024 for even months recertification, and 2025 for odd months recertification.

Elderly/Disabled Question – A participant asked what deductions are currently in place?

Teresa Moultrie explained the elderly/disabled families receive a \$400 annual deduction, families with a disabled child receive a \$480 annual deduction and families with a child in college receive a \$480 annual deduction.

Thursday November 9th, 2023 6PM In Person and Virtual

In Person Attendance

April [REDACTED]
Donna [REDACTED]
Haley [REDACTED]

Virtual Attendance

Felicia [REDACTED]
Dominique [REDACTED]
Jamie [REDACTED]
Britta [REDACTED]
Nicole [REDACTED]
Cadejiice [REDACTED]
Sheena [REDACTED]
Zaporla [REDACTED]

Questions Asked and Responses:

Recertification Question – A participant asked if the recertification changes will affect the elderly?

Teresa Moultrie explained elderly families will change to bi-annual recertifications; every other year starting in 2024 for even months recertification, and 2025 for odd months recertification.

Utility Check Question – A participant asked if they have no income how will they pay utilities when the utility checks stop?

Teresa Moultrie explained how resident services are making plans to conduct workshops early next year to help families learn strategies to help adjust finances once the utility checks are no longer available.

Utility Check Question – A participant asked when utility checks will discontinue?

Meridith Vachon explained right now the plan is to stop issuing checks in June 2024 but all proposed changes have to be voted on by the board and submitted to HUD for approval before the changes are final.

MTW Supplement 2024 Public Housing Resident Public Meetings

Thursday November 9th, 2023 In Person

Attendance

Tonya [REDACTED]
Felix [REDACTED]
Bobbie [REDACTED]
Kiwana [REDACTED]

Participant Question- Am I getting a utility allowance now?

Jill [REDACTED] explained that all residents receive a utility allowance. The utility allowance is factored into the portion of rent you pay the landlord. The resident has a TTP that they pay, so if the tenant's TTP is \$200 and the utility allowance is \$100, the tenant would pay \$100 to the landlord and have \$100 for utilities.

Tuesday November 14th, 2023 In Person

Attendance

Svetlana [REDACTED]
Mary [REDACTED]
Betty [REDACTED]
Kiarra [REDACTED]
Regina [REDACTED]
Toketha [REDACTED]

There were no questions asked about the presentation.

Monday November 20th, 2023 Virtual

Attendance

Tracey [REDACTED]

There were no questions asked about the presentation.

Tuesday, November 21st, 2023 Virtual

Attendance

John [REDACTED]

Marsha [REDACTED]

There were no questions asked about the presentation.