

South Carolina Regional Housing Authority #3
MTW Waiver Impact Analysis
April 2023

Under the Moving to Work (MTW) Operations Notice, MTW agencies, including South Carolina Regional Housing Authority #3 (SCRHA3), are required to prepare an impact analysis as a “safe harbor” for certain activities proposed in the annual MTW Supplement. MTW agencies must prepare the impact analysis:

- Prior to implementation of the MTW activity, if required as a safe harbor;
- For certain activities as defined in the MTW Operations Notice on an annual basis during the implementation of the MTW activity;
- Prior to any Safe Harbor Waiver or Agency-Specific Waiver requests; and,
- At the time the MTW activity is closed out, if an impact analysis was previously required.

SCRHA3 has prepared this impact analysis in conjunction with its first MTW Supplement. This analysis describes the projected impacts of MTW Activity 3.b. – Alternative Reexamination Schedule, which will implement a triennial reexamination schedule for Public Housing households.

1. Impact on the agency’s finances (e.g., how much will the activity cost, any change in the agency’s per family contribution)

SCRHA3 is not able to precisely determine the financial impact of this waiver as the future incomes of Public Housing households are unknown, although a relatively modest decrease in potential tenant revenue is anticipated. However, on an overall basis, SCRHA3 estimates that the effect will be revenue neutral or de minimis when considering the time savings that are projected from less frequent regular reexaminations.

2. Impact on affordability of housing costs for affected families (e.g., any change in how much affected families will pay towards their housing costs)

Moving to triennial recertifications will have a positive impact on affordability of housing costs because Public Housing residents will be able to keep any additional household income accrued between regular reexaminations without any corresponding increase in rent. Conversely, if household income decreases or household expenses increase between regular reexaminations, the household will be able to request an interim reexamination which may result in a lower rent payment.

3. Impact on the agency’s waitlist(s) (e.g., any change in the amount of time families are on the waitlist)

The proposed activity will not have any impact on the agency’s waitlist including on the amount of time families are on the waitlist.

4. 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)

SCRHA3 has developed a Hardship Policy to address potential areas of hardship for participating families. However, SCRHA3 projects that this activity will have no impact on Public Housing termination rates.

5. Impact on the agency's current occupancy level in public housing and utilization rate in the HCV program

SCRHA3 projects that this activity will have no impact on current public housing occupancy rates.

6. Impact on meeting the MTW statutory goals of cost effectiveness, self-sufficiency, and/or housing choice

SCRHA3 projects that triennial reexamination schedules will have a positive impact on the MTW statutory goal of increasing resident self-sufficiency by allowing Public Housing households a three-year window between regular recertifications during which the household can increase income without a corresponding increase in rent. Triennial reexaminations are also projected to result in a more streamlined process for determining initial eligibility and conducting regular recertifications. Thus, the activities are expected to support the MTW goal of improving cost effectiveness.

7. Impact on the agency's ability to meet the MTW statutory requirements

Implementation of the proposed MTW activity is projected to have no impact on the agency's ability to meet the five MTW statutory requirements.

8. Impact on the rate of hardship requests and the number granted and denied as a result of this activity

Due to SCRHA3's policy which allows households to request interim reexaminations due to decreases to household income or increases in other expenses, the agency expects that there will be no increase in hardship requests due specifically to the MTW activity.

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

SCRHA3 does not project any negative impacts including disparate impacts on protected classes as a result of implementation of an alternative reexamination schedule.