



# Seattle Housing Authority **Moving to Work** **2023 Annual Plan**



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# Seattle Housing Authority leadership

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## I. Introduction

The mission of the Seattle Housing Authority (SHA), a public corporation, is to enhance the Seattle community by creating and sustaining decent, safe and affordable living environments that foster stability and self-sufficiency for people with low incomes.

SHA provides affordable housing to more than 37,700 people<sup>1</sup> through a variety of opportunities including SHA owned/managed units, subsidizing collaborative units operated by non-profit partners and tenant-based vouchers that provide subsidy to participants to rent in the private market. Thirty percent of SHA's participants in Seattle are children and about the same number of participants are seniors or adults with disabilities. Nearly 82 percent of SHA households have annual incomes below 30 percent area median income and the median household income is \$12,816 annually.

In keeping with our mission, SHA also supports a wide range of community services for residents, including employment services, housing stability supports, case management and youth activities.

Funding for the agency's activities comes from multiple sources including the HUD Moving to Work (MTW) Block Grant, special purpose HUD funds, other government grants, tenant rents and revenues from other activities. This Plan follows a format prescribed by HUD and focuses on activities supported by the MTW Block Grant.

### Overview of short-term and long-term MTW goals and objectives

SHA's goals and objectives for 2023 align with the goals of the MTW Demonstration: promoting cost-effectiveness, housing choice and self-sufficiency. They also further SHA's mission, values and Strategic Plan, building on SHA's twenty plus years of innovation under MTW, SHA's goals and objectives align with the three objectives of the MTW Demonstration. Through the lens of these three goals and using the flexibility authorized under MTW, SHA continuously reviews our practices and policies to best maximize our resources and provide affordable housing to low-income people in Seattle.

### Long-term goals and objectives

MTW is a critical tool in SHA's ability to advance our mission and achieve our strategic goals and objectives. Therefore, one of our long-term goals is to retain the flexibility and stability of the MTW program so we can maximize the impact of limited federal funding for people with low incomes in need of affordable housing. Additional long-term objectives are outlined in SHA's [2016-2020 Strategic Plan](#). SHA concentrates our efforts, resources, strategies and partnerships on the following Strategic Directions:

- Expand housing opportunities: creating more affordable housing and diversifying housing choice.
- Promote quality communities: ensuring that all SHA communities offer a high-quality living environment.
- Improve quality of life: investing in services that help people lead healthy, productive lives.

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<sup>1</sup> Data was pulled on 7/1/2022.



Due to the COVID-19 pandemic, as well as the planned retirement of the agency's Executive Director in Spring 2021, planning for the next Strategic Plan was postponed. The agency has begun a new strategic planning process, with a new Plan anticipated by the end of 2023. Until a new strategic plan is adopted, the existing Strategic Plan continues to guide the agency's work.

Race and social justice is one of the Organizational Cornerstones in the agency's current Strategic Plan. To further strengthen this position, SHA will take an active stance against racism by weaving in race and social justice throughout our operations. This includes our Moving to Work and strategic planning processes as critical ways to further the agency's equity work and guide SHA towards becoming a more anti-racist organization.

### **Short-term goals and objectives**

In 2023, SHA is proposing one new strategy. Since COVID-19 emerged in 2020, SHA has made significant updates to strategies in the 2020, 2021 and 2022 MTW Plans and are working to implement and continuously improve them. We therefore have fewer updates planned for 2023 than in recent years.

#### **New Strategy 10.A.02: Mixed-status household subsidy calculation within Activity 10: Local rent policies:**

In service to our commitment to Race and Social Justice principles, staff have been reviewing policies for inequities, particularly policies which negatively impact historically marginalized communities and communities historically harmed by government institutions and housing policies. One such policy is the rent calculation protocol for so called "mixed-status" households, or households with one or more ineligible non-citizens. In reviewing the calculation protocol SHA currently uses, we found that, on average, these households are 1.5 times more likely to include people of color (including Latine/x) and three times more likely to include children in the household.

SHA has 54 mixed-status households currently under subsidy. Current protocol has SHA prorating subsidy based on the number of ineligible non-citizens, causing their rent to be higher than similar households. The result of this is families paying on average nearly \$300 more per month than they would if their subsidy was not prorated. On average these households are required to pay 175 percent of their income for rent, rather than the 30-40 percent typically paid by those not impacted by this policy. The impacts of this approach to rent determinations include households facing housing instability due to challenges paying the higher rent or, worse, not even being able to take advantage of the voucher they waited years for because they cannot find a unit they can afford.

To create greater equity between mixed-status and fully eligible households, SHA is proposing a new strategy, *10.A.02: Mixed-status household subsidy calculation*, to enable the agency to use a simplified rent calculation for mixed immigration and citizenship status families. Rent for mixed-status families would no longer increased by a percentage based on the number of ineligible members. Instead, SHA would prorate assistance by applying a reasonable, flat rate supplemental payment. More details of this strategy, including an impact analysis, hardship case criteria and financial impacts to the agency can be found in Section III: Proposed MTW Activities.

Other updates: SHA has an update to a strategy within *Activity 3: Inspection protocol* in the 2023 MTW Plan:

- Adding NSPIRE standards to Strategy 3.A.03: In keeping with Activity 3's goals of reducing frequency of inspections and using a cost-benefit approach, and in anticipation of the launch of the new NSPIRE standards in spring of 2023, SHA will be adding NSPIRE to the set of standards that may interchangeably be used to inspect SHA's owned/managed properties.

## II. General operating information

### A. Housing stock information

#### i. Planned new public housing units

Asset Management Project (AMP) name and number	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	Total units	Population type	Section 504 units (mobility)	Section 504 units (hearing / vision)
TBD	25	2	0	0	0	0	27	N/A	0	0

**Total public housing units to be added in 2023: 27**

In 2022, SHA may apply to bring South Park Manor, a 27-unit elderly and disabled-designated building in the agency's Seattle Senior Housing Program (SSHP), into our public housing portfolio using the units available under the agency's Faircloth limit. If SHA does so, SHA would also amend its Designation Plan to include South Park Manor with the elderly and disabled designation levels consistent with SSHP.

#### ii. Planned public housing units to be removed

**SHA is not proposing to eliminate any of our subsidized housing units, or replace them with tenant-based vouchers.** Public housing, for the purpose of this Plan, refers specifically to "Low-Income Public Housing subsidy." There are other types of HUD subsidy that may provide better support for these units, such as a project-based voucher subsidy. To apply for these new funding opportunities, SHA has to have them listed in the MTW Plan in Section II: General operating information. HUD requires that SHA use the terms "units to be removed" and "demolition and/or disposition." The agency is not intending to "demolish" any housing unless it is part of a planned redevelopment that would replace affordable units at one-to-one or greater. The word "dispose" is the word HUD requires to indicate that the agency may exchange the subsidy for the units from Low Income Public Housing to a different subsidy source.

Over the course of the next three years, SHA plans to evaluate its public housing inventory to identify options for increasing long-term financial stability for the Low-Income Public Housing (LIPH) communities, addressing capital and operating needs of public housing buildings and promote environmental sustainability. This proposal is an opportunity to analyze the long-term viability of SHA's public housing portfolio. By fully understanding and assessing the risks and benefits of pursuing different HUD programs, SHA could leverage additional financial resources towards both the properties and the agency. The assessment and prioritization of the building's capital needs will be a pillar of this research. The results of the research and engagement with internal and external stakeholders will be compiled into a proposal to develop a menu of feasible financing options for each property within LIPH. **This evaluation will focus on ensuring the units remain affordable and that existing residents are not negatively impacted.**

Accordingly, SHA may seek HUD approval for "demolition and/or disposition" for the following developments, as well as those listed in prior approved plans, due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, redevelopment using the Rental

Assistance Demonstration (RAD) program or other HUD funding opportunities that will serve a similar purpose.

AMP name and number	Number of units to be removed	Explanation for removal
Olive Ridge WA001000013	105	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Bell Tower WA001000015	120	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Denny Terrace WA001000017	220	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Westwood Heights WA001000023	130	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Tri-Court WA001000031	87	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Jackson Park Village WA001000037	41	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Cedarvale Village WA001000038	24	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Holly Court WA001000041	97	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000050	2	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000051	121	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000052	14	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.



AMP name and number	Number of units to be removed	Explanation for removal
Scattered Sites WA001000053	112	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000054	5	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000055	128	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000056	28	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
Scattered Sites WA001000057	73	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
High Rise Phase 1 Limited Partnership WA001000086	704	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
High Rise Phase 2 Limited Partnership WA001000087	686	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.
High Rise Phase 3 Limited Partnership WA001000088	587	Disposition and/or demolition due to obsolescence or for the purposes of redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program.

**Total public housing units to be removed in 2023: 3,284**

**iii. Planned new project-based vouchers**

Property name	Number of vouchers to be project based	RAD?	Description of project
Lam Bow Apartments	51	No	Lam Bow Apartments is a redeveloped project consisting of 82 total units, of which 51 will have project-based vouchers. Lam Bow is SHA-owned and project-based

			units there will be administered under the SLIHP program ( <i>Activity 15: Combined program management</i> ). Over 80 percent of the project-based units are family-size units.
Sawara Apartments	50	No	Sawara Apartments is part of the Yesler Terrace Development plan. Sawara will have 114 units of affordable housing, including 50 units that will have PBV subsidy. Approximately half the units are family-size units. Sawara will provide tenants with space for residential amenities, enclosed common area, common exterior play area and Property Management offices will be on-site.

<b>Total planned new project-based vouchers:</b>	<b>101</b>
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#### iv. Planned existing project-based vouchers

SHA's total **planned existing project-based vouchers for 2023 is 4,284**. The complete list includes more than 190 projects; details can be found in Appendix A.

#### v. Planned other changes to MTW housing stock anticipated during 2023

Planned other changes to MTW housing stock anticipated in 2023
<p>A new building, Lam Bow Apartments in the Delridge neighborhood of West Seattle, will complete construction in 2023, adding 51 Project-Based Voucher units, 30 straight tax-credit units, and one Common Area Unit. This replaces the 51 project-based units in the Lam Bow property after one of the buildings was destroyed in a 2016 fire and adds 30 LIHTC units to increase the availability of affordable housing in Seattle.</p> <p>In the Jefferson Terrace mixed-finance rehabilitation, work on 165 units is projected to be completed in 2023; the remaining 118 units will be completed in 2024. All units will be LIHTC with PBVs.</p> <p>Sawara, a building in the Choice Neighborhoods Initiative Yesler Terrace Development, will complete construction in late 2023/early 2024, comprising 50 Project-Based Voucher units, 64 straight tax-credit units and one Common Area Unit.</p> <p>Closing is anticipated in 2023 on the mixed-finance development of Juniper Apartments, the final Choice Neighborhoods Initiative development in Yesler Terrace. Leasing is anticipated to begin in mid-2025, with a planned unit mix of 39 Project-Based Voucher units, 53 straight tax-credit units, and one Common Area Unit.</p> <p>In 2023, SHA may also:</p> <ul style="list-style-type: none"> <li>• Apply for land disposition for sale to market-rate developers, for sale to Limited Partnerships to finance replacement housing and to the City of Seattle Parks</li> </ul>

#### Planned other changes to MTW housing stock anticipated in 2023

Department. These sites may be part of previously approved HOPE VI and CNI developments.

- Consider and convert selected properties to RAD, pending further analysis and discussion.
- Continue holding select Scattered Sites units offline to undergo substantial rehabilitation.
- Consider and use the Faircloth-to-RAD process developed by HUD to subsidize up to 1,200 units currently available under the agency's Faircloth limit.
- Pursue further acquisition of additional Local, Non-Traditional housing as opportunities arise.
- Develop a new building under SHA's Local, Non-Traditional authority on the site of Jackson Park Village that will commence in 2024 and add an estimated 40 Project-Based Voucher units, 53 straight tax-credit units and one Common Area Unit.
- Apply for dispositions (as defined in 24 C.F.R. 970) that aid, assist or further SHA's mission but that do not result in the removal of any public housing units from SHA's public housing inventory, including, without limitation, the granting of easements, leases, licenses and covenants.

#### vi. General description of all planned capital expenditures during 2023

##### General description of all planned capital expenditures during 2023

In 2023, SHA will engage in the following capital expenditures:

Accessibility: SHA will be designing a program for accessibility upgrades in numerous SSHP buildings (AMPs WA001000095, WA001000094, WA001000093 and WA001000092), including but not limited to toilet replacements, community room kitchen upgrades, mailboxes replacements and door handle replacements.

Appliances: SHA will replace aging appliances at NewHolly Phase 2 (WA001000076) and NewHolly Phase 3 (WA001000079).

Building Exterior: SHA will clean the exterior siding and repair the gutters at Holly Court (WA001000041).

Common Area Upgrades: SHA will be installing common area cooling appliances at Columbia Place (WA001000093) and updating signage at various SSHP developments.

Electrical: SHA will conduct lighting upgrades at Carroll Terrace (WA001000094), Fremont Place (WA001000092), Green Lake Plaza (WA001000086), Michaelson Manor (WA001000094), Olympic West (WA001000087) and Stewart Manor (WA001000088). Additional security lighting will be installed at Columbia Place (WA001000093) and a design project for solar panels at Denny Terrace (WA001000017) will be undertaken. SHA will also be conducting electrical upgrades at many SSHP developments and replacing failing generators across many LIPH buildings.

Elevator: SHA will be working on elevator upgrades and modifications at Capitol Park (WA001000086), Michaelson Manor (WA001000094), Olive Ridge (WA001000013), Stewart Manor (WA001000088) and Westwood Heights (WA001000023).

## General description of all planned capital expenditures during 2023

Flooring: SHA will be replacing flooring at Gideon-Mathews Garden (WA001000094), NewHolly Phase 2 (WA001000076), NewHolly Phase 3 (WA001000079), Primeau Place (WA001000094) and 11308 3rd Ave NE (WA001000055).

HVAC: SHA will be replacing boilers and hot water tanks at NewHolly Phase 2 (WA001000076) and NewHolly Phase 3 (WA001000079), as well as replacing the air handling units at Center Park (WA001000087) and University House (WA001000088).

Interior Upgrades: SHA will fix water intrusion issues at West Town View (WA001000088) and complete some general interior upgrades at 104th Street Townhomes (N/A)<sup>2</sup>, NewHolly Phase 2 (WA001000076), NewHolly Phase 3 (WA001000079), Ravenna Springs (N/A) and numerous other LIPH buildings as needs arise. SHA will also be replacing shower pans, drains, sinks and toilets at Cedarvale House (WA001000087), Green Lake Plaza (WA001000086), Jackson Park House (WA001000088) and Ross Manor (WA001000088). A new bedroom will be added to 14329 Stone Ave N (WA001000052). NewHolly Phase 3 (WA001000079) will receive new cabinets and countertops.

Life Safety: Center Park (WA001000087) will receive additional funding to complete the fire panel replacement project and SHA will be replacing sprinklers at various LIPH properties.

Painting: SHA will be cleaning and painting the exteriors of Delridge 4-Plex (WA001000056), Pleasant Valley Plaza (WA001000094), Reunion House (WA001000095) and 7100 California Ave SW (WA001000057).

Plumbing: SHA will be replacing water lines and replumbing units at Holly Court Building 6 (WA001000041), NewHolly Phase 2 (WA001000076) and NewHolly Phase 3 (WA001000079).

Roofing: SHA will conduct roof repairs and replacements at Beacon Tower (WA001000086), Capitol Park (WA001000086), Lake City House (WA001000087), 6025 21st Ave SW (WA001000056) and University House (WA001000088). SHA will also be cleaning gutters at Blakely Manor (WA001000095) and NewHolly Phase 2 (WA001000076).

Security: SHA will be continuing its ACAM upgrade and replacement work at Beacon Tower (WA001000086), Bell Tower (WA001000015), NewHolly Phase 3 (WA001000079) and several other MTW eligible Local Non-Traditional developments.

Site Work: SHA will be installing garbage station fencing at Blakely Manor (WA001000095), replacing parking lot fencing at Cal-Mor Circle (WA001000087), NewHolly Phase 2 (WA001000076), and NewHolly Phase 3 (WA001000079) and resurfacing the parking lot at Columbia Place (WA001000093) and NewHolly Phase 2 (WA001000076). Exterior grills to stairwells at Lictonwood (WA001000086) need to be installed. Fall protection will be installed at the NewHolly Phase 3 (WA001000079) playground and the sidewalks around Ravenna School Apartments (N/A) will be fixed. SHA will also conduct tree trimming and landscaping at NewHolly Phase 2 (WA001000076), as well as various homeWorks and SSHP developments.

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<sup>2</sup> Properties with "N/A" listed as their HUD Development do not have Low Income Public Housing but are eligible for federal funds as Local, Non-Traditional activities under MTW Activity 20.A.01.

General description of all planned capital expenditures during 2023

Windows and Doors: SHA will replace windows at Ravenna Springs (N/A) and Westwood Heights (WA001000023).

## B. Leasing information

### i. Planned number of households served

Planned number of households served through:	Planned number of unit months occupied/leased	Planned number of households to be served
MTW public housing units leased <sup>3</sup>	63,857	5,321
MTW Housing Choice Vouchers (HCV) utilized <sup>4</sup>	118,013	9,834
Local, non-traditional: Tenant-based	0	0
Local, non-traditional: Property-based <sup>5</sup>	5,421	452
Local, non-traditional: Homeownership	0	0
<b>Planned total households served:</b>	<b>187,291</b>	<b>15,607</b>

Local, non-traditional category	MTW activity name/number	Planned number of unit months occupied/leased	Planned number of households to be served
Tenant-based	None	0	0
Property-based	MTW Activity #8: Special purpose housing use	917	76
	MTW Activity #20: Local, non-traditional affordable housing strategies	5,421	452
Homeownership	None	0	0

### ii. Discussion of any anticipated issues/possible solutions related to leasing

Housing program	Description of anticipated leasing issues and possible solutions
MTW public housing	In the absence of further COVID-19-related restrictions, SHA does not anticipate leasing difficulties in 2023. New and continuing building rehab at several properties - including one of SHA's large high-rises - impacts the number of available public housing units. Despite these challenges, SHA anticipates that high occupancy levels will continue.

<sup>3</sup> MTW Public Housing unit months leased/households also includes units in MTW Neighborhood Services-Occupied status which are used for housing.

<sup>4</sup> Housing Choice Voucher unit months leased/households includes all voucher types included in HUD's Substantially the Same calculation.

<sup>5</sup> Local, Non-Traditional: Property-based unit months leased/households includes households reported under MTW Activity #20 in the table below. It excludes households reporting in MTW Activity #8, as those units are accounted for in MTW public housing above (per footnote 2).



Housing program	Description of anticipated leasing issues and possible solutions
MTW Housing Choice Voucher	Many anticipated leasing issues in 2023 for tenant-based vouchers are still related to uncertainty. The opening of the rental market in Seattle post COVID-19 has proceeded slowly as new waves of infections arrive. Capacity remains tight and rent high. HCV staff have been closely monitoring reopening efforts on both the market and on potential and current residents. Staff capacity has been increased to help applicants and residents navigate the confusing rental marketplace by utilizing MTW authority to streamline our annual review process and increased housing search support.
Local, non-traditional	SHA's LNT units typically do not have waiting lists so the agency must be nimble and adjust to the affordable housing market and needs of prospective renters. Nonetheless, SHA anticipates leasing will be strong throughout 2023. In 2023, as discussed in Section II(A)(v) Planned other changes to MTW housing stock anticipated during 2023, SHA will be rehabbing Jefferson Terrace, which currently includes 21 units of Special Purpose Housing. These units will therefore not be occupied in 2023 and is reflected in the lowered expected unit months occupied/leased compared to 2022.

## C. Waiting list information

### i. Waiting list information anticipated

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Plans to open the waiting list during 2022
MTW public housing <sup>6</sup>	Site-based	5,371	Open	No
MTW Housing Choice Voucher (tenant-based)	Community-wide	336	Closed	No
MTW Housing Choice Voucher (property-based) <sup>7</sup>	Site-based	1,000	Partially open	No

<sup>6</sup> SHA includes project-based units located in public housing buildings in the public housing waiting list since 2019 using our MTW authority under Activity 15: Combined program management and selected LNT properties.

<sup>7</sup> Many PBV units are managed by partners, who fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system, which maintains a central waitlist for permanent supportive housing units. The number entered here reflects the projects SHA partners with which maintain their own waiting lists outside the CEA.

ii. **Planned changes to waiting list in 2023**

Waiting list name	Description of planned changes to waiting list
MTW public housing	No changes anticipated.
MTW Housing Choice Voucher (tenant-based)	Though unlikely, SHA <i>may</i> need to replenish its current MTW tenant-based waiting list by the end of 2023. If so, SHA may take the opportunity to examine alternative approaches to the lottery/waiting list that has been used in recent years. SHA may also make waiting list changes if new opportunities arise to administer additional vouchers or otherwise address local issues
MTW Housing Choice Voucher (property-based)	No changes anticipated.

### III. Proposed MTW activities

This section provides information detailing propose new uses of MTW authority, including evaluation criteria and specific waivers to be used.

#### Proposed MTW activities

SHA is not proposing any new MTW activities in 2023.

#### Proposed MTW strategies

SHA is proposing one new strategy in 2023: *Strategy 10.A.02: Mixed-status household subsidy calculation*, within MTW Activity 10: *Local rent policy*.

Strategy number	Description
MTW Strategy 10.A.02	Mixed-status household subsidy calculation: SHA may prorate housing subsidy for mixed-status households as a per person or per household standard amount rather than using HUD's standard percentage.

#### A. Strategy description

##### i. Describe the proposed strategy

HUD regulations prescribe a punitive approach to calculating rent<sup>8</sup> for households in Low Income Public Housing or participating in the Housing Choice Voucher (HCV) program that include members with mix of subsidy eligibility due to immigration status. HUD refers to these households as “mixed-status families”. In all cases, these households include members who are eligible for full subsidy in these programs. There are a variety of reasons why a member may not be eligible for subsidy, including being in the US on a student visa or H1B1 work visa. This policy disproportionately results in substantially increased rent burden and potential for housing instability for people of color and families with children. On average these households are 1.5 time more likely to be people of color (including Latine/x) and three times more likely to include children in the household.

Currently, mixed-status families’ rent calculation starts off like any other household. Essentially, monthly income of all family members is tallied (minus any allowable exclusions or deductions) and then multiplied by 30 percent to determine the amount the household should pay toward rent. However, under current HUD regulations, the value of the assistance they receive to make their rent affordable is then prorated based on the percentage of family members with subsidy-eligible immigration status. The result of this is families paying on average nearly \$300 more per month than they would if their subsidy was not prorated. On average, these households pay 175 percent of their income in rent, rather than the 30 to 40 percent paid by those not impacted by this policy.

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<sup>8</sup> For the purposed of this strategy proposal, the term “rent” refers to SHA's base “total tenant payment” (or TTP) toward rent and utilities calculated for households in Public Housing and the Housing Choice Voucher program.

The impacts of this approach to rent determination results in households facing housing instability due to challenges paying the higher rent or, worse, not even being able to take advantage of the voucher they waited years for because they cannot find a unit they can afford. Ninety-six (96) percent of households impacted by this rent policy include people of color and 88 percent include children.

To create greater equity between mixed-status and fully eligible households, SHA is proposing a new strategy, *10.A.02: Mixed-status household subsidy calculation*, to enable the agency to use a simplified rent calculation for mixed-status families. Instead of prorating subsidy by a percentage of eligible household members, SHA would prorate assistance by reducing subsidy by a reasonable, fixed amount (hereafter referred to as a “supplemental payment”). The fixed proration amount will be finalized upon implementation of the policy and may be adjusted by updating the HCV Administrative Plan and the Admissions and Continued Occupancy Plan. The impact analysis below illustrates the likely range of the supplemental payment.

- ii. Describe how the proposed activity will achieve one or more of the three statutory objectives and the specific impacts on that statutory objective(s).*

SHA anticipates that this new strategy would promote the statutory objectives of Moving to Work in the following ways:

Housing choice: With a more reasonable amount required for rent, SHA anticipates that more families with mixed-eligibility status will be able to lease up before their vouchers expire or accept public housing units that would otherwise have been cost-prohibitive to them. Though it is difficult to predict the future demographic make-up of households receiving subsidy from SHA, the agency also hope mixed-status households will not self-screen out of applying for vital housing assistance once they learn of this policy. The agency also hopes that having a lower rent burden will open up more units and neighborhoods to Housing Choice Voucher mixed-status households in Seattle’s extremely expensive housing market, though again this is difficult to predict.

Self-sufficiency: Providing more equitable support for mixed-status families and lowering rent burden will support families to gain financial self-sufficiency and payoff or accumulate less debt more of their take-home income will be available for essentials other than housing costs. Additionally, as 88 percent of these households have children (who are almost always US citizens), this policy change will support long term equity in self-sufficiency since safe, stable housing is a core foundation for learning and long-term wellbeing including health and economic status.

- iii. Provide the anticipated schedule for implementing the proposed activity.*

SHA aims to finalize and begin implementation of this revised approach to mixed-status family subsidy/rent for new move-ins and families with rent reviews in 2023, after approval of the 2023 MTW Plan. SHA will provide updates to HUD in future MTW Plans as required or at HUD’s request.

## B. Metrics information

- i. Provide the metrics from the “Standard HUD Metrics” section that are applicable to the proposed activity.
- ii. Give the baseline performance level for each metrics (a numeric value) prior to the implementation of the proposed activity.
- iii. Give the annual benchmark for each value (a numeric value).
- iv. If applicable, give the overall and/or long-term benchmark(s) for each metric (a numeric value).
- v. Give the data source from which the metric data will be compiled.

Strategy 10.A.02: Mixed-status household subsidy calculation					
	Metric(s)	Description	Baseline	Benchmark	Final projected outcome
Outcome measures	Housing choice #7: Households assisted by services that increase housing choice	Total number of mixed-status households served per year	56 households served	Same number or higher (of MTW households served)	Not applicable
	Self-sufficiency #1: Increase in household income	Average rent burden of mixed-status families (decrease)	175%	At or below 60%	Not applicable
Data source(s)	Housing choice #7	SHA stores household member demographic information collected via HUD Form MTW-50058 in its property management database.			
	Self-sufficiency #1	SHA stores household income and rent information collected via HUD Form MTW-50058 in its property management database.			

## C. Cost implications

- i. State whether the proposed activity will result in any cost implications (positive and/or negative) for SHA.
- ii. If the proposed activity does result in cost implications, provide an estimate of the amount and discuss how SHA will manage the surplus or deficit anticipated.

The estimated financial implication to SHA is \$125,000 to \$155,000 annually in a combination of increased Housing Assistance Payments and decreased rent payments compared to HUD’s standard mixed-status family calculation. However, these households still pay more than families that are not mixed-status. Since a household’s mixed status is not taken into consideration in terms of prioritization of housing resources (admissions, issuances), the same or greater impact could occur just by “luck of the draw” of the incomes of households on our waiting lists. Additionally, given SHA’s total estimated 2023 MTW financial sources of \$237 million, this amounts to a minimal impact (about a half a percent). SHA is anticipating that lease-up rates for mixed-eligibility households would eventually increase over the current levels, but not with a large enough increase to substantially increase the costs annually.



#### **D. Need/justification for MTW flexibility**

- i. Cite the authorization(s) detailed in Attachment C and/or D of the Standard MTW Agreement (or applicable successor section in future iterations of the MTW Agreement) that gives SHA flexibility to conduct the proposed activity.*
- ii. Explain why the cited authorization(s) is needed to engage in the proposed activity.*

This MTW strategy is authorized under *Attachment C Section C(11): Rent policies and term limits* (public housing) and *Section D(2)(a): Rent policies and term limits* (HCV). Under each section, MTW agencies are authorized to “determine family payment, including total tenant payment [TTP], the minimum rent, utility reimbursements and tenant rent” in public housing and “adopt and implement any reasonable policy to establish payment standards, rents or subsidy levels” in Section 8 that “differ from the currently mandated program requirements.” Using this flexibility, SHA may determine currently ineligible family members as qualified for modified assistance using a method other than proration. To support self-sufficiency of and housing choice for mixed-status families, a simplified rent calculation will be used to calculate mixed-status families housing assistance payments. Rather than performing a prorated income calculation, SHA is proposing to apply a supplemental payment for each ineligible family member to the otherwise “normal” rent calculation. No other changes will be made to rent calculation for mixed-status households vis a vis fully-eligible households.

#### **E. Rent reform/Term limit information**

- i. Impact analysis*

This policy revision does not include term limits and no household should pay more in rent due to this policy revision. A hardship provision will be in place for any families who would have an increase of tenant portion due to the new structure, although this is not anticipated. SHA currently service 56 families with mixed status (40 in HCV and 16 in public housing).

The tables below show average impact on tenant portions without prorated rent calculation<sup>9</sup> and under two potential supplemental rent payment amounts. Amounts used below are for sample purpose only. SHA anticipates that the initial supplemental payment will be no more than \$100 per month per family member with ineligible status.

**Table 1: Housing Choice Voucher: Impact and cost analysis compared to HUD's mixed-status family rent calculation**

	Standard rent calculation (mixed-status)	Flat \$100 fee per family with ineligible members (monthly)	Fee of \$50 per ineligible family member (monthly)
Average impact on tenant share	\$0	-\$229	-\$275
Median impact on tenant share	\$0	-\$223	-\$283
Average rent burden of impacted households <sup>10</sup>	218%	68%	43%
Number of households impacted	40	40	40
Number of ineligible participants	41	41	41
Median family size	4	4	4
Total monthly supplemental payments	\$0	\$4,100	\$2,050
Total monthly cost to agency (increased housing assistance payments)	\$0	\$9,164	\$11,014
<b>Annual cost</b>	<b>\$155,568</b>	<b>\$109,968</b>	<b>\$132,168</b>

**Table 2: Public housing: Impact and cost analysis compared to HUD's mixed-status family rent calculation**

	Standard rent calculation (mixed-status)	Flat \$100 fee per family with ineligible members (monthly)	Fee of \$50 per ineligible family member (monthly)
Average impact on tenant share	\$0	-\$85	-\$126
Median impact on tenant share	\$0	-\$35	-\$85
Average rent burden of impacted households	46%	36%	33%
Number of households impacted	16	16	16
Number of ineligible participants	19	19	19
Median family size	4	4	4
Total monthly supplemental payments	\$0	\$1,900	\$950
Total monthly cost to agency (lost revenue)	\$0	\$1,367	\$2,017
<b>Annual cost</b>	<b>\$0</b>	<b>\$16,404</b>	<b>\$24,204</b>

<sup>10</sup> The average rent burden excludes households with \$0 income (six households in HCV and zero households in public housing).

*ii. Hardship case criteria*

In rare cases where the simplified rent calculation creates a higher total tenant portion than prorated rent, families may contact SHA to be approved to convert to the HUD standard prorated rent as approved by management. Criteria for approval would be an increase in TTP under the new calculation of a fair amount that is in line with other SHA rent hardship policies, such as a threshold of at least a \$30 impact to the household.

*iii. Description of annual reevaluation*

On an annual basis, the activity will be tracked by reviewing data on mixed-status households including:

- Number of mixed-status families
- Number of people in mixed-status families
- Total tenant portion
- Household income
- Household/member demographics
- Housing assistance payment amount in HCV

To identify unintended impacts, SHA will monitor any disproportionate effects on this data or outliers, while taking into consideration the data changes that may be driven by the small number of impacted households.

Using the above data, SHA will evaluate whether the strategy has made progress towards the following outcomes:

- Cost implications not significantly greater than anticipated
- More mixed-status families participating in SHA housing programs
- Reduced rent burden for mixed-status families compared to the baseline

*iv. Transition period*

Following adoption of SHA's finalized proration schedule, and appropriate updates to rent calculation systems and procedure manuals, the transition for affected households will begin at their next regularly scheduled recertification or special review and all new applicant households with ineligible-status members will receive a simplified rent calculation at their initial certification. Updates will be provided in subsequent MTW Plans to inform HUD of SHA's progress by request.

## IV. Approved MTW activities

### Introduction

This section provides HUD-required information detailing previously HUD-approved uses of SHA's MTW authority. SHA has made an effort to include all previously approved MTW activities and updates in this section. Any exclusion is unintentional and should be considered continuously approved. If additional previously approved activities, strategies or updates are discovered, we will add them to subsequent MTW Plans and Reports.

MTW activities are the overarching approved areas of reform that SHA is pursuing, such as local inspection protocols and the local project-based voucher program, often with multiple strategies to reach our goals. SHA obtained approval from HUD for many of these activities through previous Annual Plans and other means prior to execution of the Amended and Restated MTW Agreement at the end of 2008. Prior to that time, MTW agencies were not required to specify the policy elements or waivers being used to implement an activity. For the purpose of evaluating the impact and success of these activities, SHA has made an effort to break down the specific elements of the initiative into distinct strategies where feasible.

In accordance with the required HUD format, activities are organized in sections based on whether they are active, not yet implemented, on hold or closed out. Some strategies within an activity may be inactive or closed out and are indicated as such under their appropriate heading. To date, HUD has approved 22 MTW Activities, which are:

Active MTW activities
1. Development simplification
2. Family Self-Sufficiency program
3. Inspection protocol
5. Local leases
8. Special purpose housing use
9. Project-based program
10. Local rent policy
11. Resource conservation
12. Waiting lists, preferences and admission
13. Homeownership and graduation from subsidy
15. Combined program management
18. Short-term assistance
19. Mobility and portability
20. Use of funds for local non-traditional affordable housing
22. Housing assistance for school stability
Not yet implemented activities
21. Self-sufficiency assessment and planning
Activities on hold
4. Investment policies
Closed out activities
6. MTW Block Grant and fungibility
7. Procurement
14. Related nonprofits
16. Local asset management program
17. Performance standards

In the following pages, we provide descriptions of these MTW activities that have been previously approved and describe anticipated updates for 2023.

Within each approved activity, SHA structures the section with the required HUD data as well as a table of strategies. For convenience, SHA uses a numbering system to categorize strategies as agency-wide (noted with an “A” in the number), voucher-specific (noted with an “H”) and public housing-specific strategies (noted with a “P”). These categorizations are neither official nor limiting in the application of the strategies. The dates in the “Year(s) updated” column are supplied for the purpose of enabling readers to easily find significant updates since a strategy was first identified. Some updates may be unintentionally left out.

## **Emergency response and recovery**

In SHA’s 2021 MTW Plan, the agency established an emergency response and recovery protocol. In the event that a government body with authority over SHA’s jurisdiction (e.g., City of Seattle, King County, State of Washington, the federal government), SHA’s Board of Commissioners and/or SHA’s Executive Director (as authorized by the Board of Commissioners) declares a state of emergency, SHA may utilize state of emergency and recovery flexibilities outlined in its MTW plan during a state of emergency and subsequent recovery. The state of emergency declaration may last until the emergency has been deemed to end by the declaring body or the declaration expires. The recovery period may last up to 18 months following the state of emergency, unless an extension is necessary due to conditions that preclude staff and residents from undertaking regular operations. While Washington State has not yet declared an end to the COVID-19 state of emergency, in 2023, SHA does not anticipate enacting these precautions unless an additional state of emergency is declared sometime in the year.

### **A. Implemented activities**

#### **MTW Activity #1: Development simplification**

##### *Status*

MTW Activity #1 was included in SHA’s 1999 MTW Agreement and first proposed in the 1999 Annual Plan. It was first implemented in 2004.

##### *Description*

Development simplification helps SHA to move quickly to acquire, finance, develop, and remove public housing properties from its stock in an efficient, market-driven manner. MTW flexibilities allow the agency to respond to local market conditions and avoid delays and associated costs incurred as a consequence of HUD requirements and approval processes. While of greatest impact when the housing market is highly competitive, these strategies present opportunities continuously for SHA to avoid costs and increase housing options as circumstances arise.

Approved strategies in this activity are as below.



Strategy	Description	First identified	Current status	Year(s) updated <sup>11</sup>
Public housing strategies				
1.P.01	Design guidelines: SHA may establish reasonable, modest design guidelines, unit size guidelines and unit amenity guidelines for development and redevelopment activities.	1999 MTW Agreement	Not yet implemented	None
1.P.02	Streamlined public housing acquisitions: Acquire properties for public housing without prior HUD approval, provided that HUD site selection criteria are met.	1999 MTW Agreement	Activated in 2004	None
1.P.03	Total Development Cost limits: Replace HUD's Total Development Cost limits with reasonable limits that reflect the local marketplace for quality construction.	1999 MTW Plan	Not yet implemented	2019
1.P.04	Streamlined mixed-finance closings: Utilize a streamlined process for mixed-finance closings	2000 MTW Plan	Activated in 2005	2005 2006 2012
1.P.05	Streamlined public housing demo/dispo process: Utilize a streamlined demolition/disposition protocol negotiated with the Special Applications Center for various public housing dispositions	2000 MTW Plan	Activated in 2004	2004 2006 2009 2012
1.P.06	Local blended subsidy: SHA may blend public housing and Housing Choice Voucher funds to subsidize units that serve households earning below 80 percent of Area Median Income.	2018 MTW Plan	Not yet implemented	2019

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.

<sup>11</sup> Any years notated as XXXX-R indicate the update was included in an MTW Report. All other years indicate that the update was in an MTW Plan.

## MTW activity #2: Family self-sufficiency program

### Status

MTW activity #2 was first proposed in the 1999 Annual Plan. It was first implemented in 2018.

### Description

SHA's JobLink program is an innovative initiative that combines family self-sufficiency (FSS) with other funding streams to allow participants streamlined access to multiple resources. JobLink's mission is to help SHA residents increase their income through employment. JobLink uses one-on-one coaching support to connect residents to employment, education, and resources. The program is open to all SHA residents aged 18 and older and helps residents build job preparation and interview skills, teaches financial planning and literacy skills, supports residents to start a small business, connects residents with resources in the community such as childcare and transportation and helps residents sign up for college or vocational training, apply for jobs or explore buying a home.

MTW strategies have been designed to help JobLink expand its impact by providing incentives for participation and using local selection criteria, contract terms and escrow calculation methods. Escrow accounts and short-term incentives such as education, employment and emergency fund payments are distinct strategies and receipt of short-term incentives does not disqualify a household from receiving an escrow disbursement in the future.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
2.A.01	FSS: Partner with City: Partner with the City of Seattle to share responsibilities and resources for a new integrated FSS program.	1999 MTW Plan	Not yet implemented	None
2.A.02	SJI preference + time limits: Preference for Seattle Jobs Initiative participants coupled with time limits.	1999 MTW Plan	Not yet implemented	None
2.A.03	FSS escrow accounts: Use local policies for determining escrow calculation, deposits, and withdrawals.	2007 MTW Plan	Activated in 2018	2017 2020 2021
2.A.04	FSS participation contract: Locally designed contract terms including length, extensions, interim goals, and graduation requirements.	2007 MTW Plan	Activated in 2018	2018 2020 2021
2.A.05	FSS Program Coordinating Committee: Restructure Program Coordinating Committee (PCC) to better align with program goals and local resources.	2007 MTW Plan	MTW authority not needed	None

Strategy	Description	First identified	Current status	Year(s) updated
2.A.06	FSS program incentives: Provide incentives to participants including those who do not receive escrow deposits, including program offerings for non-heads of household and other members not enrolled in HUD's FSS program.	2007 MTW Plan	Activated in 2018	2016 2018 2020 2021
2.A.07	FSS selection preferences: Up to 100 percent of FSS enrollments may be selected by local preferences.	2007 MTW Plan	Activated in 2018	2016

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

In the 2023 MTW Report and moving forward, SHA will be removing the following metrics from the annual evaluation of Activity 2: Family Self-Sufficiency:

Current metric	Unit of measurement	Reason for removal
Self-sufficiency #8: Households transitioned to self-sufficiency	Number of participants transitioned to unsubsidized housing	The goal of the JobLink program is not to move households off of subsidy, but rather to increase income through employment opportunities.
Self-sufficiency #8: Households transitioned to self-sufficiency	Number of participants whose primary source of income is wages	This metric is not as strong of an indicator of program success as is metric Self-sufficiency #1: Increase on household income, unit of measurement Average earned income of JobLink participants.

### *Planned significant changes*

None.

## MTW Activity #3: Inspection protocol

### Status

MTW Activity #3 was first proposed in the 1999 Annual Plan. It was first implemented in 2001.

### Description

SHA uses a cost-benefit approach to unit and property inspections. Current strategies in this approach include using SHA's own staff to complete HQS inspection of its properties with vouchers and inspecting residences on a less frequent schedule.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
3.A.01	Private sector cost benefit and risk management approaches to inspections such as avoiding duplicative inspections by using other recent inspections for agencies such as the Washington State Housing Finance Commission	1999 MTW Plan	Activated in 2020	2003 2004 2009 2012 2019 2020 2021
3.A.03 (Combined and recategorized from 3.H.03, 3.P.01)	Reduced frequency of inspections: Cost-benefit approach to housing inspections allows Seattle Housing to establish local inspection protocol, including less frequent inspections and interchangeable use of HQS/UPCS/UPCS-V/NSPIRE.	1999 MTW Plan	Activated in 2003	2002 2005 2009 2011 2013 2014 2017 2020 2021 2022 2023
Voucher strategies				
3.H.01	Inspect SHA-owned properties: Allows SHA staff, rather than a third-party entity, to complete inspections of SHA owned properties.	2000 MTW Plan	Activated in 2001	2000-R
3.H.02	Fines for no-shows at inspections: Impose fines on the landlord or participant for failing to be present at scheduled inspections.	2005 MTW Plan	Not yet implemented	2005-R 2006
3.H.03	Reclassified as 3.A.03			
3.H.04	Self-certification for minor fails: Self-certification by landlords of correction of minor failed inspection items.	2010 MTW Plan	Activated in 2021	2022
Public housing strategies				
3.P.01	Reclassified as 3.A.03			

## 2023 Updates

In 2023, SHA has the following updates to the implementation of existing strategies under Activity 3:

Update to Strategy 3.A.03: Reduced frequency of inspections: Strategy 3.A.03 allows SHA to create a local inspections protocol. In 2013, SHA clarified that staff may use HQS and UPCS standards interchangeably when inspecting SHA's owned and managed units. In 2015, when UPCS-V was launched, SHA added it to the list of inspections standards that could be used interchangeably as well. Therefore, in anticipation of HUD's launch of the new NSPIRE standards in the spring of 2023, the agency will be adding NSPIRE to the set of standards that may interchangeably when SHA staff conduct inspections. In addition, with the growth of SHA's LIHTC portfolio owned by private LLCs, we are further clarifying that this strategy applies to any unit type subsidized by or under SHA's purview.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.

## **MTW Activity #5: Local leases**

### *Status*

MTW Activity #5 was first proposed in the 1999 Annual Plan. It was first implemented in 1999.

### *Description*

SHA utilizes local lease strategies to incorporate best practices from the private market and to encourage self-sufficiency.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below.

c	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
5.A.01	Self-sufficiency requirement: All households receiving subsidy from SHA (public housing or voucher) in	1999 MTW Plan	Activated in 1999	2005 2005-R 2022



c	Description	First identified	Status	Year(s) updated
	HOPE VI communities must participate in self-sufficiency activities.		Inactivated in 2022	
Voucher strategies				
5.H.01 (Recategorized from 9.H.06 in 2021)	HAP contracts: SHA may modify the HAP contract and Tenancy Addendum.	2000 MTW Plan	Activated in 2000	2000-R 2021 2022
Public housing strategies				
5.P.01	Local lease: SHA may implement its own lease, incorporating industry best practices.	2001 MTW Plan	Activated in 2011	2004 2005 2005-R 2009 2010 2011
5.P.02	Grievance procedures: Modify grievance policies to require tenants to remedy lease violations and be up to date in their rent payments before granting a grievance hearing for proposed tenancy terminations.	2008 MTW Plan	Not yet implemented	None
5.P.03	Lease term for public housing units: SHA may offer lease renewals for six months or month-to-month time periods.	2009 MTW Plan	Activated in 2009	2012
5.P.04	Property-specific pet policies: SHA may establish pet policies, which may include the continuation or establishment of pet-free communities or limits on the types of pets allowed, on a building by building basis.	2011 MTW Plan	Activated in 2011	None
5.P.05	Leasing incentives: SHA may offer lease incentives to promote the leasing of a public housing unit	2017 MTW Plan	Activated in 2018	None

### 2023 Updates

None.

### Planned non-significant changes

None.

### Planned changes to metrics/data collection

Current metric	Unit of measurement	Reason for removal
Self-sufficiency #5: Households assisted by services that increase self-sufficiency	Total number of households affected by HOPE VI self-sufficiency requirement receiving self-sufficiency services	SHA removed the local self-sufficiency requirement for HOPE VI communities in the 2022 MTW Plan. Total number of residents receiving

Current metric	Unit of measurement	Reason for removal
		self-sufficiency services is captured by metric Self-sufficiency #5: Households assisted by services that increase self-sufficiency in <i>Activity 2: Family self-sufficiency program</i> .
Self-sufficiency #8: Households transitioned to self-sufficiency	Total number of households affected by HOPE VI self-sufficiency requirement whose primary source of income is wages	SHA removed the local self-sufficiency requirement for HOPE VI communities in the 2022 MTW Plan.
Self-sufficiency #8: Households transitioned to self-sufficiency	Percent of HOPE VI households whose primary source of income from wages	SHA removed the local self-sufficiency requirement for HOPE VI communities in the 2022 MTW Plan.

#### *Planned significant changes*

None.

### **MTW Activity #8: Special purpose housing use**

#### *Status*

MTW Activity #8 was first implemented prior to SHA being granted MTW status in 1999.

#### *Description*

SHA utilizes public housing units to provide special purpose housing and to improve quality of services or features for targeted populations. In partnership with agencies that provide social services, SHA is able to make affordable housing available to households that would not likely be admitted in traditional public housing units. With this program SHA allows partner agencies to use residential units both for service-enriched transitional/short-term housing and for office space for community activities and service delivery. The ability to designate public housing units for specific purposes and populations facilitates this work, by allowing units to target populations with specific service and housing needs or specific purposes.

Approved strategies in this activity are as below.

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
8.A.01	Conditional housing: Housing program for those who do not	2000 MTW Plan	Not yet implemented	None

Strategy	Description	First identified	First implemented	Current status
	currently quite meet SHA's minimum qualifications			
8.A.02	Program-specific waiting lists: Operate separate waiting lists (or no waiting list) for specific programs such as service enriched units.	2000 MTW Plan	Activated prior to MTW implementation	2009 2010-R 2019
8.A.03	Service-enriched housing: With the help of key partners, SHA may develop supportive housing communities.	2001 MTW Plan	Not yet implemented	None
Public housing strategies				
8.P.01	Agency units for housing and related supportive services: Make residential units available for service-enriched housing by partner agencies.	1999 MTW Agreement	Activated prior to MTW implementation	2009 2010 2010-R
8.P.02	Agency units for services: Make residential units available as space for community activities, management use, and partner agencies providing services in and around the community.	1999 MTW Agreement	Activated prior to MTW implementation	2010-R 2011 2012 2015
8.P.03	Designate LIPH units for specific purposes/populations: SHA may designate properties/units for specific purposes such as elderly.	2000 MTW Plan	Activated in 2011	2001 2008 2010 2011
8.P.04	Definition of elderly: Allows change in definition of elderly for HUD-designated elderly preference public housing from 62 to 55.	2008 MTW Plan	Not yet implemented	None
8.P.05	Pet-free environments: Establish pet-free environments in connection with selected service enriched housing.	2009 MTW Plan	Not yet implemented	None

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.

## MTW Activity #9: Project-based program

### Status

MTW Activity #9 was first proposed in the 1999 Annual Plan. It was first implemented in 2000.

### Description

SHA uses MTW to develop and implement a local project-based program, providing vouchers to subsidize units in SHA-owned and privately owned properties throughout Seattle. SHA's project-based activities include a large number of MTW strategies to reduce costs, make project-based programs financially feasible for owners and to provide housing choice in the city. The project-based program promotes housing choice through strategies such as offering site-specific waiting lists maintained by providers (and, therefore, does not issue exit vouchers), expanding the definition of eligible unit types, allowing more project-based units per development and overall, admitting people with certain types of felonies on their records, reallocating vouchers to programs and providers (not just units), allowing payment standards that promote services and the financial viability of projects and coupling housing assistance with services by working with partners. The project-based program reduces SHA's costs through strategies allowing project-based owners to self-certify selected inspections and maintain their own waiting list, reducing the frequency of inspections by SHA staff, streamlining admissions and non-competitively allocating subsidies to SHA units. Project-based program strategies also make contract terms consistent with requirements for other leveraged funding sources.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below:

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
9.H.01	Cost-benefit inspection approach: Allows SHA to establish local inspection protocol, including self-certification that inspection standards are met at time of move in for mid-year turnovers	1999 MTW Plan	Activated in 2004 Inactivated in 2021	2020
9.H.02	Assets in rent calculation: Only calculate income on assets declared as valuing \$5,000 or more.	2000 MTW Plan	Activated in 2005	None
9.H.03	Choice offered at beginning (no exit vouchers): Housing choice is offered at the beginning of the project-based admissions process (by nature of site-specific waiting lists); exit vouchers are not offered.	2000 MTW Plan	Activated in 2000	2005
9.H.04	Contract term: Project-based commitments renewable up to 40 years.	2000 MTW Plan	Activated in 2000	None
9.H.05	Eligible unit types: Modify the types of housing accepted under a project-	2000 MTW Plan	Activated in 2002	None

Strategy	Description	First identified	Status	Year(s) updated
	based contract - allows shared housing and transitional housing.			
9.H.06	Recategorized as 5.H.01 (2021)			
9.H.07	Non-competitive allocation of assistance: Allocate project-based subsidy non-competitively to SHA controlled units, including non-contiguous project-based units within a portfolio.	2000 MTW Plan	Activated in 2000	2001 2005-R 2018
9.H.08	Owners may conduct new and turnover inspections: SHA may allow project-based owners to conduct their own new construction/rehab inspections and to complete unit turnover inspections	2000 MTW Plan	Activated in 2005	None
9.H.09	Percent of vouchers that may be project-based: Raise the percentage of vouchers that may be project-based above HUD limits, including exclusion of replacement vouchers and calculation based on authorized number of vouchers.	2000 MTW Plan	Activated in 2000	2008 2008-R 2011 2016
9.H.10	Unit cap per development: Waives the 25% cap on the number of units that can be project-based in a multi-family building without supportive services or elderly/disabled designation.	2000 MTW Plan	Activated in 2008	None
9.H.11	Rent cap-30% of income: Project-based participants cannot pay more than 30% of their adjusted income for rent and utilities.	2000 MTW Plan	Activated in 2000 Inactivated in 2011	2011
9.H.12	Streamlined admissions: SHA may streamline and centralize applications and waiting list processes for project-based HCV units.	2000 MTW Plan	Activated in 2000	2010-R 2017
9.H.13	Competitive allocation process: Commit vouchers to the City's competitive process for housing funding.	2004 MTW Plan	Activated in 2005 Inactivated in 2011	2011
9.H.14	Payment standards for SHA units: Allows higher than Voucher Payment Standard for SHA-operated project-based units if needed to support the project budget (while still taking into account rent reasonableness).	2004 MTW Plan	Activated in 2004	2005-R
9.H.15	Subsidy cap in replacement units: Cap subsidy at levels affordable to households at 30% AMI in project-based HOPE VI replacement units where SHA also contributed capital to write-down the unit's affordability to that level.	2004 MTW Plan	Activated in 2004 Inactivated in 2011	2011

Strategy	Description	First identified	Status	Year(s) updated
9.H.16	Admissions-admit people with felony records under certain conditions: Allows for the admission into Project-based Voucher units of people with Class B and Class C felonies on their records subject to time-limited sex offender registration requirements who do not, in the opinion of the owner of the subsidized units, constitute a threat to others.	2005 MTW Plan	Activated in 2005	2005-R
9.H.17	Program-based vouchers: Allocate floating voucher subsidy to a defined group of units or properties.	2003 MTW Plan	Activated in 2004	2003-R
9.H.18	Provider-based vouchers: Provide vouchers to selected agencies to couple with intensive supportive services. The agency master leases units and subleases to tenants.	2007 MTW Plan	Activated in 2007	None
9.H.19	Streamlined admissions and recertifications: SHA may streamline admissions and recertification processes for provider-based and project-based programs.	2009 MTW Plan	Not yet implemented	None
9.H.20	Partners maintain own waiting lists: Allow partners to maintain waiting lists for partner-owned and/or operated units/vouchers and use own eligibility and suitability criteria.	2000 MTW Plan	Activated in 2000	None
9.H.21 (Recategorized from 9.H.20 in 2013)	COPES housing assistance payment calculations: Count as zero income for residents who are living in project-based units at assisted living properties where Medicaid payments are made on their behalf through the COPES system	2012 MTW Plan	Activated prior to MTW implementation	2013

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.



## MTW Activity #10: Local rent policy

### Status

MTW Activity #10 was first proposed in the 2000 Annual Plan. It was first implemented in 2000.

### Description

SHA's rent policy program tackles a number of objectives, including increased flexibility in the rent calculation process and determining the eligibility of units and payment standards. Rent policies also promote cost effectiveness and self-sufficiency through a minimum rent and asset income threshold and through streamlined rent review processes.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
10.A.01	Streamlined income verification: SHA may adopt local rules-regarding the length of time income verification is considered valid and a local verification hierarchy.	2014 MTW Plan	Activated in 2014	2020 2021 2022
10.A.02 (Recategorized from 10.P.23 in 2021)	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2014 MTW Plan	Activated in 2015	2018 2019 2021
Voucher strategies				
10.H.01	Rent burden-include exempt income: Exempt income included for purposes of determining affordability of a unit in relation to 40% of household income.	2000 MTW Plan	Activated in 2005	2005 2014
10.H.02	Rent cap-use gross income: Rent burden calculated on 40% of Gross Income, up from HUD's standard 30% of Adjusted Income.	2000 MTW Plan	Activated in 2005	2003 2005
10.H.03	Rent reasonableness at SHA-owned units: Allows SHA staff to perform rent reasonable determination for SHA-owned units.	2000 MTW Plan	Activated in 2000	2006 2017
10.H.04	Payment standard: SHA may develop local voucher payment standards, including supplements for opportunity areas and different standards for market-rate and affordable housing and shared housing.	2003 MTW Plan	Activated in 2003	2003 2006 2008 2011 2012 2015 2016 2017 2018

Strategy	Description	First identified	Current status	Year(s) updated
				2019 2020 2021
10.H.05	Absolute minimum rent: The minimum rent for all residents will be established annually by SHA. No rent will be reduced below the minimum rent amount by a utility allowance.	2003 MTW Plan	Not yet implemented	2005
10.H.06	Payment standard-SROs: SHA may use the studio payment standard for SRO units.	2003 MTW Plan	Activated in 2003	None
10.H.07	Tenant-based self-sufficiency incentives: Rent policies to foster self-sufficiency among employable households, including income disregards proportional to payroll tax; allowances for employment-related expenses; intensive employment services coupled with time limits; locally defined hardship waivers.	2005 MTW Plan	Not yet implemented	None
10.H.08	Imputed income from TANF: Impute TANF income if household appears eligible and has not documented ineligibility. TANF not counted toward income if family is sanctioned.	2006 MTW Plan	Not yet implemented	None
10.H.09	Rent reasonableness streamlining: Allows SHA to streamline rent reasonable determinations, including automatic annual updates and shared housing.	2006 MTW Plan	Activated in 2016	2008 2016 2017 2018 2021
10.H.10	Income reviews conducted for households with 100% elderly and/or disabled adults only every three years (within a period of 40 months).	2009 MTW Plan	Activated in 2010	2013 2014 2015 2020 2021
10.H.11	Recategorized as 13.H.02. See Activity #13.			
10.H.12	Asset income threshold: SHA will establish a threshold for calculating asset income to an amount up to \$50,000 and may allow self-certification of assets below the threshold.	2010 MTW Plan	Activated in 2010	2015
10.H.13	Streamlined medical deduction: SHA will allow self-certification of medical expenses.	2010 MTW Plan	Activated in 2011	2015
10.H.14	Simplified utility allowance schedule: HCV participants' rent will be adjusted for a Utility Estimate based on the number of bedrooms (defined as the lower of voucher size or actual unit size) and tenant responsibility for payment of energy, heat, and	2011 MTW Plan	Activated in 2011	2023

Strategy	Description	First identified	Current status	Year(s) updated
	sewer/water under their lease, with a proration for energy-efficient units.			
10.H.15	Disregard of student financial aid as income: SHA may disregard student financial aid as income.	2019 MTW Plan	Activated in 2019	2020
Public housing strategies				
10.P.01	Absolute minimum rent: Tenants pay a minimum rent (\$50 or more) even if utility allowance would normally result in a lower rental payment or reimbursement.	2000 MTW Plan	Activated in 2001	2005
10.P.02	Earned Income Disregard: HUD's Earned Income Disregard is not offered to public housing residents.	2000 MTW Plan	Activated in 2001	2000 2001
10.P.03	Income reviews conducted for households with 100% elderly and/or disabled adults only every three years (within a period of 40 months).	2001 MTW Plan	Activated in 2004	2005 2013 2014 2015 2020 2021
10.P.04	Rent freezes: Voluntary rent policy freezes rent in two-year intervals.	2000 MTW Plan	Activated in 2000	2000 2001 2005
10.P.05	TANF rent calculation: Calculate TANF participant rent on 25% of gross income.	2000 MTW Plan	Activated in 2000	2000 2001 2005
10.P.06	Tenant Trust Accounts: A portion of working public housing residents' income may be deposited in an escrow account for use toward self-sufficiency purposes.	2000 MTW Plan	Activated in 2000 Inactivated in 2012	2000 2001 2005 2010 2012
10.P.07	Ceiling rent two-year time limit: When a tenant's calculated rent reaches the ceiling rent for their unit, the rent will not be increased beyond the rent ceiling for 24 months.	2000 MTW Plan	Activated in 2001 Inactivated in 2012	2000 2001 2005 2012
10.P.08	Impute income from public benefits: SHA may impute income in rent calculation for tenants declaring no income who appear eligible for but decline to collect cash benefits	2000 Annual Plan	Activated in 2000	2000 2005 2013
10.P.09	Partners develop separate rent policies: Allow partner providers and HOPE VI communities to develop separate rent policies that are in line with program goals and/or to streamline.	2005 MTW Plan	Not yet implemented	None
10.P.10	Studio vs. one-bedroom: Differentiate rents for studios vs. one-bedroom units.	2005 MTW Plan	Not yet implemented	2005
10.P.11	Utility allowance-self-sufficiency and resource conservation: Change utility allowance where metering permits to	2005 MTW Plan	Not yet implemented	None

Strategy	Description	First identified	Current status	Year(s) updated
	encourage self-sufficiency and resource conservation.			
10.P.12	Utility allowance-schedule: SHA may change utility allowances on a schedule different for current residents and new move-ins.	2008 MTW Plan	Activated in 2008	None
10.P.13	Streamlined for fixed income: Further streamline rent policy and certification process for fixed income households, including self-certification of medical expenses.	2009 MTW Plan	Activated in 2014	2015
10.P.14	Streamlined rent policy for partnership units: Allow non-profit partners operating public housing units to implement simplified rent policies.	2009 MTW Plan	Not yet implemented	None
10.P.15	Utility allowance: frequency of utility allowance updates: SHA may revise the schedule for reviewing and updating utility allowances due to fluctuations in utility rates.	2009 MTW Plan	Activated in 2010	2010 2018
10.P.16	Utility allowance: local benchmark: SHA may develop new benchmarks for "a reasonable use of utilities by an energy conservative household" - the standard by which utility allowance are calculated.	2009 MTW Plan	Not yet implemented	None
10.P.17	SSHP rent policy: Rents in SSHP units will be one of five flat rents based on the tenant's percentage of Area Median Income, with annual adjustments and income reviews only every three years.	2011 MTW Plan	Activated in 2011	2018 2021
10.P.18	No HUD-defined flat rents: SHA does not offer tenants the choice of "flat rents" as required of non-MTW agencies (includes alternate calculation for mixed citizenship households).	2000 MTW Plan	Activated in 2001	2000 2017
10.P.19 (Recategorized from 10.P.17 in 2013)	Asset income threshold: SHA will increase the threshold for including asset income in rent contribution calculations to an amount up to \$50,000 and may allow self-certification of assets below the threshold.	2012 MTW Plan	Activated in 2012	2013 2015
10.P.20	Simplified Utility Assistance Payment for HOPE VI communities: HOPE VI participants receive a maximum level of consumption rather than reduction, and incentive for conservation. Annual adjustments are made at the next regularly scheduled annual review or update.	2013 MTW Plan	Activated in 2013	2014

Strategy	Description	First identified	Current status	Year(s) updated
10.P.21	Market rate rent: SHA may charge market rate rent as a penalty for noncompliance with the annual review process.	2005 MTW Plan	Activated in 2005	2015
10.P.22	Delay in rent increase for newly employed households: SHA may allow a longer notification period before rent increase if the increase is due to the resident becoming employed after at least six months of unemployment and is self-reported by the resident in a timely manner.	2014 MTW Report	Activated in 2014	2014
10.P.23	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2015 MTW Plan	Activated in 2015	2018 2019
Emergency response & recovery				
10.EM.01	States of emergency: certification deferrals: SHA may defer regular rent reviews for all household types during states of emergency and recovery until the agency has recovered from the crisis, as defined in the Introduction to Section IV. Residents retain applicable opportunities to have an interim review.	2020 MTW Plan	Activated in 2020	None

### *2023 Updates*

In 2023, SHA has the following updates to the implementation of existing strategies under Activity 10:

Update to Strategy 10.H.14: Simplified utility allowance schedule: SHA has had the authority to adopt a simplified, local utility allowance schedule based on bedroom size since 2011. In updates to Strategy 10.H.04: Payment standard in 2020 and 2021, SHA clarified that the agency had the authority to use local and state agency definitions of bedroom size (such as the Seattle Department of Construction and Inspections) for determining the voucher payment standard (VPS). The intent of this update was to use local definitions of bedroom size for all relevant aspects of total tenant payment, not just VPS. In 2022, SHA is clarifying that the local definition of bedroom size will also apply to calculating the household utility allowance.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

*Planned significant changes*

None.

**MTW Activity #11: Resource conservation**

*Status*

MTW Activity #11 was first proposed in the 2000 Annual Plan. It was first implemented in 2000.

*Description*

SHA's resource conservation strategies take advantage of the agency's existing relationships with the City of Seattle and local utility providers, which continuously identify opportunities to increase resource conservation and reduce costs, rather than conducting a HUD-prescribed energy audit every five years. Conservation strategies have already achieved significant energy and cost savings to the agency, including conversion to more efficient toilets and electrical upgrades.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Public housing strategies				
11.P.01	Energy protocol: Employ a cost-benefit approach for resource conservation in lieu of HUD-required energy audits every five years.	2000 MTW Plan	Activated in 2000	2004

*2023 Updates*

None.

*Planned non-significant changes*

None.

*Planned changes to metrics/data collection*

None.

*Planned significant changes*

None.



## MTW Activity #12: Waiting lists, preferences and admissions

### Status

MTW Activity #12 was first proposed in the 2000 Annual Plan. It was first implemented in 2000.

### Description

SHA's waiting list, preferences and admission strategies are primarily intended to increase efficiencies which, in turn, facilitate housing access. These MTW flexibilities include streamlining onerous administrative requirements to match local needs and non-profit housing partners to administer their own waiting lists. Several of SHA's streamlining practices over the years are no longer needed under MTW as they are now allowable practices for all housing authorities.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
12.A.01	Local preferences: SHA may establish local preferences for federal housing programs.	2002 MTW Plan	Activated in 2002 Inactivated in 2011	None
12.A.02 (Recategorized from 12.H.06 in 2021)	Streamlined eligibility verification: Streamline eligibility verification standards and processes, including allowing income verifications to be valid for up to 180 days.	2009 MTW Plan	Activated in 2013	2020 2021
Voucher strategies				
12.H.01	Recategorized as 9.H.20			
12.H.02	Voucher distribution through service provider agencies: Up to 30% of SHA's tenant-based vouchers may be made available to local nonprofits, transitional housing providers, and divisions of local government that provide direct services for use by their clients without regard to their client's position on SHA's waiting list.	2000 MTW Plan	Activated in 2002	2001 2003
12.H.03	Special issuance vouchers: Establish a "special issuance" category of vouchers to address circumstances where timely issuance of vouchers can prevent homelessness or rent burden.	2003 MTW Plan	Activated in 2003	2017
12.H.04	Admit applicants owing SHA money: Provide voucher assistance to households owing SHA money from prior tenancy under specific	2008 MTW Plan	Activated in 2008 Inactivated in 2010-R	2008-R

Strategy	Description	First identified	Status	Year(s) updated
	circumstances, for example if they enter into a repayment agreement.			
12.H.05	Limit eligibility for applicants in subsidized housing: Implement limits or conditions for tenants living in subsidized housing to participate in the HCV program. For example, before issuing a Public Housing resident a Voucher, they must fulfill the initial term of their public housing lease.	2008 MTW Plan	Activated in 2011	None
12.H.06	Recategorized as 12.A.02 (2021)			
Public housing strategies				
12.P.01	Site-based waiting lists: Applicants can choose from several site-specific and/or next available waiting lists.	1999 MTW Plan	Activated in 1999 Inactivated in 2011	None
12.P.02	Partners maintain own waiting lists: Allow partners to maintain waiting lists for partner-owned and/or operated units (traditional LIPH units; service provider units, etc.) and use own eligibility and suitability criteria (including no waiting list).	2000 MTW Plan	Activated in 2000	None
12.P.03	Expedited waiting list: Allow applicants referred by selected partners (primarily transitional housing providers) to receive expedited processing and receive the "next available unit."	2004 MTW Plan	Activated in 2004 Inactivated in 2018	2005-R
12.P.04	No waiting list: Allows for filling units without a waiting list.	2008 MTW Plan	Not yet implemented	None
12.P.05	Eligibility criteria: Unique eligibility criteria for specific units or properties, such as service enriched units.	2008 MTW Plan	Not yet implemented	None
12.P.06	Seattle Senior Housing Program (SSHP) waiting list policy: SHA will not distinguish between senior and non-senior disabled households in filling vacancies in the SSHP portfolio based on bedroom size. The SSHP program will maintain a 90 percent senior, 10 percent non-senior disabled ratio at the AMP level.	2013 MTW Plan	Activated in 2013 Inactivated in 2023	2023

### 2023 Updates

Through the most recent Designated Housing Plan (approved 10.27.2022), SHA has authorization to operate 894 Seattle Senior Housing Program (SSHP) units as elderly/disabled mix. As such, *Strategy 12.P.06: Seattle Senior Housing Program (SSHP) Waiting List Policy* is no longer needed at this time. SHA has marked the strategy as inactivate in the MTW 2023 Annual Plan.

*Planned non-significant changes*

None.

*Planned changes to metrics/data collection*

None.

*Planned significant changes*

None.

**MTW Activity #13: Homeownership and graduation from subsidy**

*Status*

MTW Activity #13 was first proposed in the 2004 Annual Plan. It was first implemented in 2004.

*Description*

SHA provides support for the multiple ways that households can successfully move on from housing subsidy, not only through homeownership, but also through unsubsidized rentals in the private market, to facilitate the goals of the family and the ability of SHA to serve additional families in need of housing assistance. These strategies include an End of Participation clock for households whose income has increased to the point where they no longer require substantial subsidy while allowing them to remain in an affordable Low Income Housing Tax Credit unit and piloting incentives for positive tenant departures.

As first approved in 2021, SHA may allow participants to provide select approvals and certifications over the phone, by email or other means in lieu of a signature.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
13.A.01	Down payment assistance: Allocate MTW Block Grant funds to offer a local down payment assistance program.	2004 MTW Plan	Activated in 2004 Reactivated in 2021	2004-R 2007 2021 2022
13.A.02	Savings match incentive: Program that matches savings and provides financial information for participating public housing and HCV households leaving subsidized housing for homeownership or unsubsidized rental units.	2012 MTW Plan	Activated in 2013 Reactivated in 2021	2021 2022
13.A.03 (formerly 13.H.01)	Mortgage assistance: Seattle Housing Authority may develop a	2008 MTW Plan	Activated in 2021	2021

Strategy	Description	First identified	Status	Year(s) updated
	homeownership program that includes mortgage subsidy.			
Voucher strategies				
13.H.01	Recategorized as 13.A.03 (2021)			
13.H.02	180-day EOP clock: The 180-day End of Participation “clock” due to income will start when a family’s Housing Assistance Payment (HAP) reaches \$50 or less.	2010 MTW Plan	Activated in 2010	2012 2021
Public housing strategies				
13.P.01	End of Participation for higher income households in mixed-income communities: In mixed-income communities, SHA will remove subsidy when household income exceeds the established limit for six months.	2012 MTW Plan	Activated in 2016	2017 2018
13.P.02	Incentives for positive tenant departures and housing stability: SHA may provide a financial incentive to public housing households who vacate their unit in a manner consistent with SHA unit guidelines.	2019 MTW Plan	Activated in 2019	None

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

If SHA implements any significant homeownership program in 2023 or future years, we will reevaluate the metrics for this activity at that time.

One of the buildings used in the evaluation metrics for *Strategy 13.P.02: Incentives for positive tenant departures and housing stability*, Jefferson Terrace, will be offline for much of 2022-2024 for a significant rehabilitation project (see *Section II.A.v. Planned other changes to MTW housing stock anticipated during 2023* for additional details on this project). Jefferson Terrace will be removed from the properties measured for the strategy until, at the earliest, the building has fully come back online.

### *Planned significant changes*

None.

## MTW Activity #15: Combined program management

### *Status*

MTW Activity #15 was first proposed in the 2008 Annual Plan. It was first implemented in 2008. Subsequent amendments to the activity are included in the table below.

### *Description*

In some of its communities, SHA co-locates units funded through project-based vouchers and low-income public housing. Combining program management and policies for both of these types of units (referred to as Streamlined Low Income Housing Program, or SLIHP, units) within the same community reduces costs by eliminating redundancies, including duplicative rent reviews and inspections. It also avoids unnecessary disparities between tenants of the two different types of units. SHA's current implementation of this activity allows for all units subsidized by project-based housing choice vouchers to be operated like public housing subsidized units in communities that receive both types of subsidy. This streamlined approach includes transfer policies as well as acceptance of slight differences (generally less than \$1) in rent calculation caused by different data systems of record for vouchers and public housing.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
15.A.01	Combined program management: Combined program management for project-based vouchers co-located with public housing or other units in communities operating both subsidy types.	2008 MTW Plan	Activated in 2008	2008-R 2009 2010 2014 2018

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.

## MTW Activity #18: Short-term assistance

### Status

MTW Activity #18 was first proposed in the 2013 Annual Plan. It was first implemented in 2013. Subsequent amendments to the activity are included in the table below.

### Description

SHA is working on multiple fronts with community partners to develop innovative new assistance programs that are designed to be short-term in length. These new programs help households both access and retain housing through one-time or temporary assistance such as rent, deposits, arrears, utility assistance, moving and relocation costs, and temporary housing as needed. Short-term assistance is paired with targeted services when needed, including connections to case management, employment, childcare services, and domestic violence counseling.

SHA's MTW activities for short-term assistance also include disregarding one-time or short-term emergency assistance from other sources to prevent households from losing their housing in determining eligibility and rent contribution.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
18.A.01	Interagency Domestic Violence Transfer Program: SHA may join an inter-jurisdictional transfer program to assist residents and program participants who become victims of domestic violence.	2014 MTW Plan	Not yet implemented	None
18.A.02	Emergency assistance for housing stability: SHA may disregard one-time or short-term emergency assistance from other sources to prevent households from losing their housing in determining eligibility and rent contribution.	2014 MTW Plan	Activated in 2014	None
18.A.03 (Recategorized from 18.H.01 in 2021)	Short-Term Rental Assistance: SHA may provide funding for short-term shallow rental assistance through cooperative community initiatives to help families, students, adults, and youth obtain and retain housing.	2013 MTW Plan	Activated in 2013	2014 2015 2016 2021
Voucher strategies				
18.H.01	Recategorized as 18.A.03 (2021)			

### 2023 Updates

None.



*Planned non-significant changes*

None.

*Planned changes to metrics/data collection*

None.

*Planned significant changes*

None.

**MTW Activity #19: Mobility and portability**

*Status*

MTW Activity #19 was first proposed in the 2013 Annual Plan. It was first implemented in 2015. Subsequent amendments to the activity are included in the table below.

*Description*

Mobility and portability strategies are designed to support cost effectiveness and to increase access to targeted units and neighborhoods for voucher holders.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
19.H.01	Limiting portability in high-cost areas: SHA may deny requests for portability moves to another jurisdiction when the receiving housing authority intends to administer rather than absorb the voucher and the resulting payment standard would be higher than SHA's payment standard.	2013 MTW Plan	Not yet implemented	None
19.H.02	Housing choice moving cost assistance and support: SHA may develop a program for voucher households to provide assistance with housing search, access supplements, deposits and similar costs, outreach and incentives for landlord participation such as risk reduction funds and access supplements.	2014 MTW Plan	Activated in 2015	2015 2017 2018 2022
19.H.03	One-year residency requirement before port out: SHA may require that Housing Choice Voucher households live in Seattle for one year before	2015 MTW Plan	Activated in 2015	None

Strategy	Description	First identified	Status	Year(s) updated
	moving with their voucher to a different community.			
19.H.04	Streamlined local timelines and processes for improved leasing success: SHA may modify leasing timelines and processes to support leasing success and improve efficiency	2019 MTW Plan	Activated in 2019	None

### *2023 Updates*

None.

### *Planned non-significant changes*

None.

### *Planned changes to metrics/data collection*

None.

### *Planned significant changes*

None.

## **MTW Activity #20: Local non-traditional affordable housing strategies**

### *Status*

MTW Activity #20 was first proposed in the 2013 Annual Plan, per HUD guidance. It was first implemented in 1999. Subsequent amendments to the activity are included in the table below.

### *Description*

SHA sometimes uses MTW Block Grant funds to support affordable housing outside of the traditional public housing and voucher programs. This activity includes both short- and long-term funding for development, capital improvement, and maintenance of affordable housing units. It may also provide financial maintenance, such as the contribution of funds to meet an established Debt Coverage Ratio, required for continued operation of the affordable units. SHA follows applicable requirements regarding local non-traditional use of MTW funds.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
20.A.01	Use of funds for local non-traditional affordable housing: SHA may use Block Grant funds to develop, capially improve, maintain and operate affordable housing outside of the traditional public housing and voucher programs.	2013 MTW Plan	First used in 2011	2013-R 2015

### *2023 Updates*

None.

### *Actual non-significant changes*

None.

### *Actual changes to metrics/data collection*

None.

### *Actual significant changes*

None.

## **MTW Activity #22: Housing assistance for school stability**

### *Status*

MTW Activity #22 was first proposed in the 2016 Annual Plan. It was first implemented in 2016. Subsequent amendments to the activity are included in the table below.

### *Description*

Stable, quality schools are a core component of neighborhoods of opportunity. SHA is partnering with local service providers and the school district to implement Home from School, a collaborative initiative to support homeless and unstably housed families with children in order to positively impact family and school stability. Student turnover, especially mid school year, creates challenges for schools and for students, both in serving new students and those who remain throughout the year. Residential stability can lead to an uninterrupted school year for students and can prevent fewer school changes that often leave children behind academically.

SHA provides housing assistance to participating families, using multiple means as available, including prioritizing preference for participating families for admission into units within the selected neighborhood, as well as tenant-based vouchers for participating families, with use limited to the school neighborhood. Partnering service providers provide outreach, enrollment, and pre and post-move support, including services such as housing search, assistance with

barriers to leasing such as lack of security deposit and utility arrears, and connecting families to neighborhood resources and services.

Participation in the program is voluntary and priority is given to literally homeless families. To continue to receive SHA housing assistance, participating families must remain in the school neighborhood until their children graduate from elementary school.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
22.A.01	Housing assistance for school stability: SHA may provide housing assistance for homeless or unstably housed low-income families with children at selected neighborhood schools.	2016 MTW Plan	Activated in 2016	None

#### *2023 Updates*

None.

#### *Planned non-significant changes*

None.

#### *Planned changes to metrics/data collection*

None.

#### *Planned significant changes*

None.

## B. Not-yet-implemented activities

### MTW Activity #21: Self-sufficiency assessment and plan

#### *Status*

MTW Activity #21 was first proposed in the 2015 Annual Plan. It has not been implemented. Subsequent amendments to the activity are included in the table below. The activity was placed on hold in 2017.

#### *Description*

This activity is intended to increase self-sufficiency by connecting participants to assessments, individualized plans, and community resources designed to help them increase their education, training, and credentials and obtain higher wage jobs.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
21.A.01	Self-sufficiency assessment and plan: SHA may make self -sufficiency assessments and planning mandatory for work-able adults	2015 MTW Plan	Not yet implemented	2019

#### *Reactivation*

SHA launched the Workforce Opportunity System pilot in 2015 and at the end of 2017 ended the three-year pilot program without needing to make participation mandatory. Key strategies from the pilot were integrated in the new JobLink program in 2018, which streamlined access to services previously delivered through the Family Self-Sufficiency and Economic Opportunities programs. Mandatory participation has not been needed to date but each year SHA will continue to monitor enrollment and participation and may make changes such as requiring mandatory participation based on those results.

## C. Activities on hold

### MTW Activity #4: Investment policies

#### *Status*

MTW Activity #4 was first proposed in the 1999 Annual Plan. It was first implemented in 1999. Subsequent amendments to the activity are included in the table below. The activity was placed on hold in 2013.

#### *Description*

SHA's MTW investment policies give the agency greater freedom to pursue additional opportunities to build revenue by making investments allowable under Washington State's investment policies in addition to HUD's investment policies. Each year, SHA assesses potential investments and makes a decision about whether this MTW flexibility will be needed. In 2018 investment flexibility was not needed and all SHA investments followed HUD policies.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
4.A.01	Investment policies: SHA may replace HUD investment policies with Washington State investment policies.	1999 MTW Plan	Activated in 1999 Placed on hold in 2013	1999 2017 2019

#### *Reactivation*

SHA annually assesses potential investments to determine which investment policies are most beneficial. MTW alternate investment policies were not needed in 2019. However, SHA continues to revisit its investment strategies annually in consideration of both the agency's financial plans and available investment opportunities.



## D. Closed out activities

### MTW Activity #6: MTW block grant and fungibility

#### *Status*

MTW Activity #6 was included in SHA's 1999 MTW Agreement. It was first implemented in 1999. Subsequent amendments to the activity are included in the table below. The activity was closed out in 2011.

#### *Description*

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
6.A.01	MTW Block Grant: SHA combines all eligible funding sources into a single MTW Block Grant used to support eligible activities.	1999 MTW Agreement	Activated in 1999 Closed out in 2011	None
6.A.02	Obligation and expenditure timelines: SHA may establish timelines for the obligation and expenditure of MTW funds	1999 MTW Agreement	Activated in 1999 Closed out in 2011	2003-R
6.A.03	Operating reserve: Maintain an operating reserve consistent with sound management practices	1999 MTW Agreement	Activated in 1999 Closed out in 2011	None
Voucher strategies				
6.H.01	Utilization goals: Utilization defined by use of budget authority	2003 MTW Plan	Activated in 2003 Closed out in 2011	None

#### *Reason for closing*

While the Block Grant, fungibility, operating reserve and utilization goals continue to be active and critical elements of SHA's participation as an MTW agency, this activity may be considered closed out as of 2011, which was the last year that SHA reported on it as a separate activity. HUD no longer allows SHA to establish timelines for the obligation and expenditure of MTW funds. SHA reports on uses of single fund/Block Grant fungibility in Section V of this report.

### MTW Activity #7: Procurement

#### *Status*

MTW Activity #7 was included in SHA's 1999 MTW Agreement. It was first implemented in 1999. Subsequent amendments to the activity are included in the table below. The activity was closed out per HUD guidance in 2011.

### *Description*

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
7.A.01	Construction contract: Locally-designed form of construction contract that retains HUD requirements while providing more protection for SHA	1999 MTW Plan	Activated in 1999 Closed out in 2011	None
7.A.02	Procurement policies: Adopt alternative procurement system that is competitive and results in SHA paying reasonable prices to qualified contractors	1999 MTW Plan	Activated in 1999 Closed out in 2011	None
7.A.03	Wage rate monitoring: Simplified process for monitoring the payment of prevailing wages by contractors	1999 MTW Plan	Activated in 1999 Closed out in 2011	2003 2006

### *Reason for closing*

While SHA's MTW procurement activity was approved by HUD in the 1999 Annual Plan, HUD has since that time taken the position that it is not an allowable MTW activity.

## **MTW Activity #14: Related nonprofits**

### *Status*

MTW Activity #14 was first proposed in the 2004 Annual Plan. It was never implemented. The activity was closed out in 2013.

### *Description*

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
14.A.01	Related non-profit contracts: SHA may enter into contracts with any related nonprofit.	2004 MTW Plan	Never implemented Closed out in 2013	None

### *Reason for closing*

SHA never implemented this activity, which would have allowed the agency to enter into contracts with related nonprofits. SHA determined that existing partnership structures were adequate without needing additional MTW authority.

## MTW Activity #16: Local asset management program (LAMP)

### Status

MTW Activity #16 was included in SHA's 2000 MTW Plan. It was first implemented in 2000. Subsequent amendments to the activity are included in the table below. The activity was closed out in 2013.

### Description

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
29 (Archival numbering system)	Local asset management program: Use asset management principles to optimize housing and services	2000 MTW Plan	Activated in 2000 Closed out in 2013	None

### Reason for closing

Although SHA maintains the authority to implement the LAMP, and the continued operation of the LAMP remains an essential element of the agency's participation in the MTW program, this activity may be considered closed out at HUD's request as of 2013.

## MTW Activity #17: Performance standards

### Status

MTW Activity #17 was included in SHA's 1999 MTW Agreement. It was first implemented in 1999. Subsequent amendments to the activity are included in the table below. The activity was closed out in 2014.

### Description

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
30 (Archival numbering system)	Local performance standards in lieu of HUD measures: Develop locally relevant performance standards and benchmarks to evaluate the agency performance in lieu of HUD's Public Housing Assessment System (PHAS)	1999 MTW Plan	Activated in 1999 Closed out in 2014	None

*Reason for closing*

Although SHA continues to maintain and refine alternate performance standards, this activity may be considered closed out at HUD's request as of 2014.

## V. Planned application of MTW funds

### A. Planned application of MTW funds

#### i. Estimated sources of MTW funds

FDS line item number	FDS line item name	Dollar amount
70500 (70300+70400)	Total tenant revenue	\$ 15,459,000
70600	HUD PHA operating grants	\$ 238,988,000
70610	Capital grants	\$ 16,858,000
70700 (70710+70720+70730+70740+70750)	Total fee revenue	\$ 0
71100+72000	Interest income	\$ 64,000
71600	Gain or loss on sale of capital assets	N/A <sup>12</sup>
71200+71300+71310+71400+71500	Other income	\$ 1,759,000
<b>70000</b>	<b>Total revenue</b>	<b>\$ 273,128,000</b>

#### ii. Estimated application of MTW funds

FDS line item number	FDS line item name	Dollar amount
91000 (91100+91200+91400+91500+91600+ 91700+91800+91900)	Total operating - Administrative	\$ 27,067,000
91300+91310+92000	Management fee expense	\$ 9,233,000
91810	Allocated overhead	N/A
92500 (92100+92200+92300+92400)	Total tenant services	\$ 297,000
93000 (93100+93600+93200+93300+93400+ 93800)	Total utilities	\$ 6,699,000
93500+93700	Labor	N/A
94000 (94100+94200+94300+94500)	Total ordinary maintenance	\$ 15,364,000
95000 (95100+95200+95300+95500)	Total protective services	\$ 326,000
96100 (96110+96120+96130+96140)	Total insurance premiums	\$ 2,461,000
96000 (96200+96210+96300+96400+96500+ 96600+96800)	Total other general expenses	\$ 2,067,000
96700 (96710+96720+96730)	Total interest expense & amortization cost	N/A
97100+97200	Total extraordinary maintenance	\$0
97300+97350	HAP + HAP portability-in	\$ 130,900,000

<sup>12</sup> N/A in tables above indicates that SHA does not budget these items for MTW.

FDS line item number	FDS line item name	Dollar amount
97400	Depreciation expense	N/A
97500+97600+97700+97800	All other expense	\$ 17,608,000
<b>90000</b>	<b>Total expenses</b>	<b>\$212,022,000</b>

Please describe any variance between estimated total revenue and estimated total expenses:

Estimated sources of funds exceed estimated application of funds for several reasons. The summary of expenditures table does not include capital expense, which account for approximately \$16.9 million. Seattle Housing Authority's planned capital expense budget is not part of the Application table, but capital is shown as a source. In addition, the Application table does not include \$30.5 million that Seattle Housing Authority plans to spend on local housing, programs and services for voucher and public housing participants (such as career coaching, youth engagement and education), parks operations in low-income communities and planning for and redevelopment of low-income housing. See the description of single-fund flexibility that follows this section for a discussion of expenses not included within the uses table. The Application table also does not capture \$1.0 million for required replacement reserve contributions.

### iii. Description of planned application of MTW funding flexibility

Planned application of MTW funding flexibility
<p>Seattle Housing Authority established an MTW Block Grant Fund under the original MTW Agreement and continues to use single-fund flexibility under the Amended and Restated MTW Agreement. MTW Block Grant single-fund flexibility is vital in supporting the agency's array of low-income housing programs and services, its local partnerships and to meet locally defined needs. Seattle Housing Authority exercises its MTW authority to tailor allocation of funds and project cash flow among projects and programs as the agency deems necessary to further its mission and strategic plan, MTW plan, cost objectives, statutory compliance and local housing needs. The agency analyzes expenditures such as housing, rental assistance, tenant and community services, sustainability services, administrative and capital needs annually through the budget process to determine the level of service and resource needs accordingly.</p> <p>The bulk of SHA's use of its MTW single-fund authority is focused on activities in MTW communities, support of low-income housing development and preservation and services for Low-Income Public Housing and Housing Choice Voucher participants. Examples are:</p> <ul style="list-style-type: none"> <li>• Community supportive services, including: <ul style="list-style-type: none"> <li>○ Deepening SHA's commitment to youth education by expanding external partnerships and supporting youth achievement through emotional supports and activities such as youth tutoring, job training and extracurricular activities.</li> <li>○ Providing Aging in Place and stability services for elderly and/or disabled residents through partnerships which provide participants' increased access to critical health care and related services.</li> <li>○ Supporting SHA's adult residents and participants on their journey toward economic self-sufficiency through SHA's local JobLink program.</li> </ul> </li> </ul>

### Planned application of MTW funding flexibility

- Innovating to improve housing stability for all residents by meeting them where they are at, including leveraging resources to create Permanent Supportive Housing, incorporating trauma-informed practices into everyday interactions and facilitating access to housing stability support services such as landlord mediation and hoarding support.
- Maintaining parks and open spaces for low-income communities with play opportunities for children, team sports activities for youth and passive and active exercise options for all.
- Engaging in planning, pre-development, construction and construction services for asset preservation, public housing redevelopment and opportunities to increase affordable housing for low-income people.

The MTW Block Grant allocations in 2023 will enable Seattle Housing Authority to:

- Evaluate and find long-term financial stability options to strategically address capital and operating needs and environmental sustainability of our communities.
- Address maintenance and repair of residential units that were deferred or unreported by residents during COVID. Also increase housing inspection capacity and preventative maintenance, reduce lead base paint and address overall unit quality to improve resident satisfaction and REAC scores.
- Increase security at communities to address safety of our residents and hire a consultant to evaluate the short and long term needs of the SHA's communities.
- Begin researching options for supporting and housing residents at risk of eviction and in need of greater support including the possibility of transitioning them into Permanent Supportive Housing.
- Test a new staffing model designed to increase and improve youth education and engagement at our family communities.
- Plan a pilot program to help provide bridge housing for formerly incarcerated persons needing minimal services to avoid homelessness.
- Launch a pilot program to report rent payment history to credit scoring agencies with the goal of improving participants credit worthiness and their ability to gain better access to financial projects and private market rental housing.
- Design a quality internship and mentor program in the IT field aimed at the BIPOC community in order to provide equitable opportunities and promote diversity.

### B. Planned application of SHA's unspent operating fund and HCV funding

Original funding source	Beginning of FY - unspent balances	Planned application of PHA unspent funds during FY
HCV HAP*	\$428,456	\$0
HCV admin fee		
PH operating subsidy	\$ 5,253,718	\$0
<b>Total:</b>	<b>\$ 5,682,174</b>	<b>\$0</b>



Description:

**NOTE:** MTW funds are fungible and not designated as HCV HAP, HCV Admin Fee or PH Operating Subsidy; rather, MTW funds represent SHA's pool of Single-Fund/Block Grant authority.

SHA plans to maintain its HCV and PH reserve balances in order to meet unforeseen urgent and emergency needs that may arise in the future.

### C. Local asset management plan

- i. Is SHA allocating costs within statute?
- ii. Is SHA implementing a local asset management plan (LAMP)?
- iii. Has SHA provided a LAMP in the appendix?
- iv. If SHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in 2022 or state that SHA does not plan to make any changes in 2022.

Pursuant to the requirements of OMB Super Circular Part 200, the Indirect Service Fee (IDSF) is determined in a reasonable and consistent manner based on projected total units and leased vouchers. The IDSF is a per-housing-unit or per-leased-voucher fee per month charged to each program. For the 2023 budget, the per-unit-month (PUM) cost will be \$68.44 for housing units and \$24.60 for leased vouchers.

As part of the IDSF calculation, MTW Block Grant revenues can also be used to support any positive or negative budget variance as part of the annual reconciliation process.

No changes are proposed.

### D. Rental Assistance Demonstration participation

- i. Description of Rental Assistance Demonstration (RAD) participation

Rental Assistance Demonstration (RAD) participation
N/A

- ii. Has SHA submitted a RAD significant amendment in the appendix?
- iii. If SHA has provided a RAD significant amendment in the appendix, please state whether it is the first RAD significant amendment submitted or describe any proposed changes from the prior RAD significant amendment.

N/A
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## **VII. Administrative**

### **A. Board resolution and certifications of compliance**

SHA's Board of Commissioners voted on the adoption of the Annual MTW Plan on October 17, 2022. The signed Resolution, Certifications of Compliance and lobbying disclosure form are included in Appendix C of the MTW Plan. The signed Certification of Consistency with the Consolidated Plan (Form HUD-2991) is also included in this appendix.

### **B. Documentation of public process**

The public comment period for the MTW Annual Plan began on August 31, 2022 and concluded on October 7, 2022. Extensive efforts will be made to make residents, tenants and the public aware of the availability of the Plan and comment period, including posting in the *Daily Journal of Commerce*, messages in our e-newsletters that reach thousands and flyers in buildings and common areas (where practical due to COVID-19 restrictions). The draft Plan is publicly available on SHA's website ([www.seattlehousing.org](http://www.seattlehousing.org)) or by requesting a copy (see Plan cover page). A public hearing was held remotely via remote audio/video conferencing service on September 12, 2022 at 3:00 pm. Language interpretation and disability accommodations are made available by request, as is an in-person option. Results of the public hearing and comment period will be included in the final version of the MTW Plan.

Staff also met remotely with SHA's two resident advisory groups, the Joint Policy Advisory Committee and Senior Joint Policy Advisory Committee, at a combined meeting on September 27, 2022 to discuss the Plan activities and proposed updates. Results of these meetings and processes were taken into consideration in finalizing the MTW Plan, and resulted in one non-substantive change to the descriptive information in *Section II(A)(ii) Planned public housing units to be removed*. Documentation of this process was presented to the Board of Commissioners at the October 10, 2022 Board Briefing and can be made available to HUD upon request.

### **C. Planned and ongoing evaluations**

SHA is not currently engaged in any third-party agency-wide evaluations of its MTW program. No external MTW evaluations are planned for 2023.

### **D. Lobbying disclosures**

The signed Certificate of Payments (Form HUD-50071) is included in Appendix C of the final MTW Plan.

## VIII. Appendix A: Planned existing project-based vouchers

The below table consists of the tenant-based vouchers that SHA is currently project-basing in 2022. Some properties may have more than one existing AHAP/HAP contract with SHA and may be listed two or more times. This section meets the requirements prescribed in HUD Form 50900 Section II.A.iv. "Planned Existing Project Based Vouchers."

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Al ?al ?al	29	Leased	No	Permanent supportive housing
104 <sup>th</sup> St. Townhomes	3	Leased	No	Affordable housing
A Place of Our Own	19	Leased	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	Leased	No	Enhanced behavioral health services
Aldercrest	8	Leased	No	Affordable housing
Almquist Apartments	52	Leased	No	Permanent supportive housing
Arbora Court	40	Leased	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	Leased	No	Affordable housing
Aurora House	30	Leased	No	Permanent supportive housing
Avalon Place	9	Leased	No	Permanent supportive housing
Baldwin Apartments	15	Leased	No	Affordable housing
Bayview Tower	21	Leased	No	Affordable housing
Beacon House	6	Leased	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	Leased	No	Affordable housing
Bergan Place	2	Leased	No	Homeless young adults
Bergan Place	8	Leased	No	Affordable housing
Brettler Family Place I	51	Leased	No	Service-enriched for homeless families (with at least one minor)
Brettler Family Place II	21	Leased	No	Service-enriched for homeless families (with at least one minor)
Broadway Crossing	10	Leased	No	Service-enriched for homeless individuals
Broadway Crossing	9	Leased	No	Service-enriched for homeless families (with at least one minor)
Bush Hotel	7	Leased	No	Affordable housing
Casa Pacifica	6	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Casa Pacifica	5	Leased	No	Affordable housing
Cascade Court Apartments	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Cascade Court Apartments	5	Leased	No	Affordable housing
Cate Apartments	10	Leased	No	Affordable housing
Cate Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Cedar Crossing	7	Leased	No	Affordable housing
Centerwood Apartments	2	Leased	No	Affordable housing
Colonial Gardens	20	Leased	No	Affordable housing
Columbia Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	16	Leased	No	Affordable housing
Community Psychiatric Clinic	14	Leased	No	Enhanced behavioral health services
Compass Broadview	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	Leased	No	Permanent supportive housing
Compass on Dexter	36	Leased	No	Service-enriched for homeless individuals
Council House	30	Leased	No	Senior housing
CPC 10 <sup>th</sup> Ave. NW	5	Leased	No	Enhanced behavioral health services
CPC Alderbrook	6	Leased	No	Enhanced behavioral health services
Crestwood Place Apartments	6	Leased	No	Affordable housing
Croft Place	7	Leased	No	Affordable housing
David Colwell Building	25	Leased	No	Affordable housing
Dekko Place	5	Leased	No	Affordable housing
Delridge Heights Apartments	3	Leased	No	Affordable housing
Delridge Triplexes	6	Leased	No	Affordable housing
Denny Park Apartments	5	Leased	No	Affordable housing
Denny Park Apartments	8	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
DESC	12	Leased	No	Enhanced behavioral health services
Eastern Hotel	4	Leased	No	Affordable housing
Eastlake Supportive Housing	25	Leased	No	Permanent supportive housing
Emerald City Commons	12	Leased	No	Affordable housing
Ernestine Anderson Place	33	Leased	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	Leased	No	Permanent supportive housing
Evans House	49	Leased	No	Permanent supportive housing
Fir Street Apartments	7	Leased	No	Affordable housing
First Place	4	Leased	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	Leased	No	Senior housing
Four Freedoms House	126	Leased	No	Senior housing
Fremont Solstice Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Golden Sunset	21	Leased	No	Affordable housing project
The Genessee	17	Leased	No	Affordable housing
The Genessee	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Gossett Place	12	Leased	No	Permanent supportive housing
Gossett Place	28	Leased	No	Permanent supportive housing
High Point	100	Leased	No	Affordable housing
Hilltop House	30	Leased	No	Senior housing
Hoa Mai Gardens	70	Leased	No	Affordable housing
Hobson Place	63	Leased	No	Permanent supportive housing
Holden Manor	1	Leased	No	Affordable housing
Holden Street Family Housing (Saint Teresita del Niño Jesus)	25	Leased	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	Leased	No	Affordable housing
Humphrey House	71	Leased	No	Permanent supportive housing

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Imani Village	8	Leased	No	Service-enriched for homeless families (with at least one minor)
Josephinum Apartments	25	Leased	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	Leased	No	Service-enriched for homeless individuals
Judkins Park	4	Leased	No	Affordable housing
Judkins Park	4	Leased	No	Service-enriched for homeless families (with at least one minor)
The Julie Apartments	20	Leased	No	Affordable housing
The Julie Apartments	2	Leased	No	Affordable housing
The Julie Apartments	6	Leased	No	Service-enriched for homeless individuals
The Karlstrom	17	Leased	No	Service-enriched for homeless individuals
Kebero Court	83	Leased	No	Affordable housing
Kenyon Housing	18	Leased	No	Permanent supportive housing
Kerner-Scott House	15	Leased	No	Permanent supportive housing
Kingway Apartments	16	Leased	No	Service-enriched for homeless families (with at least one minor)
Kristin Benson Place	77	Leased	No	Permanent supportive housing
Lake City Commons	15	Leased	No	Affordable housing
Lake Washington Apartments	37	Leased	No	Affordable housing
Lakeview Apartments	15	Leased	No	Affordable housing
Lakeview Apartments	5	Leased	No	Affordable housing
Lakeview Apartments	6	Leased	No	Affordable housing
Legacy House	22	Leased	No	Senior housing
Leschi House	35	Leased	No	Senior housing
Lewiston Apartments	28	Leased	No	Permanent supportive housing
Lincoln Apartments	4	Leased	No	Affordable housing
Lyon Building	12	Leased	No	Permanent supportive housing
Main Street Apartments	2	Leased	No	Affordable housing
Main Street Place	8	Leased	No	Affordable housing
Marion West	25	Leased	No	Service-enriched for homeless individuals

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Martin Court	28	Leased	No	Service-enriched for homeless individuals
Martin Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Jr. Apartments	10	Leased	No	Affordable housing
Martina Apartments (fka CHS Greenwood)	66	Leased	No	Permanent supportive housing
Mary Avenue Townhomes	8	Leased	No	Affordable housing
McDermott Place	15	Leased	No	Permanent supportive housing
McDermott Place	10	Leased	No	Permanent supportive housing
Meadowbrook View Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Mercer Court	3	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	5	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	10	Leased	No	Service-enriched for homeless families (with at least one minor)
MLK Properties	6	Leased	No	Affordable housing
Monica's Village Place	38	Leased	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	Leased	No	Affordable housing
Morrison Hotel	190	Leased	No	Permanent supportive housing
Muslim Housing	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	5	Leased	No	Service-enriched for homeless families (with at least one minor)
Nihonmachi Terrace	20	Leased	No	Affordable housing
Nihonmachi Terrace	5	Leased	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	Leased	No	Affordable housing
NP Hotel	5	Leased	No	Affordable housing
Oleta Apartments	6	Leased	No	Affordable housing
One Community Commons	5	Leased	No	Service-enriched for homeless individuals



Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
One Community Commons	7	Leased	No	Service-enriched for homeless families (with at least one minor)
Opportunity Place	145	Leased	No	Permanent supportive housing
Ozanam House (formerly Westlake II)	29	Leased	No	Permanent supportive housing
Pacific Hotel	6	Leased	No	Permanent supportive housing
Palo Studios at the Josephinum	7	Leased	No	Service-enriched for homeless individuals
Pantages Apartments	10	Leased	No	Affordable housing
Pantages Apartments	11	Leased	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	Leased	No	Affordable housing
Park Place	100	Leased	No	Assisted living
Park Place	36	Leased	No	Assisted living
Parker Apartments	8	Leased	No	Affordable housing
Parkview Services	23	Leased	No	Affordable housing for people with disabilities
Pat Williams Apartments	20	Leased	No	Permanent supportive housing
Patricia K. Apartments	12	Leased	No	Permanent supportive housing
Patrick Place	40	Leased	No	Permanent supportive housing
Pioneer Human Services	11	Leased	No	Service-enriched for homeless individuals
Plymouth on First Hill	77	Leased	No	Permanent supportive housing
Plymouth on Stewart	74	Leased	No	Permanent supportive housing
Plymouth Place	70	Leased	No	Permanent supportive housing
Rainier Vista	23	Leased	No	Affordable housing
Raven Terrace	50	Leased	No	Affordable housing
Ravenna Springs Properties	13	Leased	No	Affordable housing
Red Cedar	80	Leased	No	Affordable housing
Rise at Yancy	44	Leased	No	Permanent supportive housing
Rose of Lima House	30	Leased	No	Permanent supportive housing
Rose Street Apartments	4	Leased	No	Affordable housing
Samaki Commons	12	Leased	No	Affordable housing
Samaki Commons	8	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Sand Point Campus	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	Leased	No	Permanent supportive housing for families
Scattered Sites – Bitterlake portfolio	54	Leased	No	Affordable housing
Scattered Sites – Madison portfolio	17	Leased	No	Affordable housing
Scattered Sites – Northeast Seattle portfolio	38	Leased	No	Affordable housing
Scattered Sites – Northwest Seattle portfolio	47	Leased	No	Affordable housing
Scattered Sites – South Park portfolio	16	Leased	No	Affordable housing
Scattered Sites – South Seattle portfolio	10	Leased	No	Affordable housing
Scattered Sites – University District portfolio	5	Leased	No	Affordable housing
Scattered Sites – West Seattle portfolio	41	Leased	No	Affordable housing
Sea-Mar Family Housing	5	Leased	No	Service-enriched for homeless families (with at least one minor)
SHA - SFD special portfolio	1	Leased	No	Affordable housing
Simons Senior Housing Apartments	77	Leased	No	Permanent supportive housing
Sound Mental Health	6	Leased	No	Service-enriched for homeless individuals
Sound Mental Health	20	Leased	No	Service-enriched for homeless individuals
South Shore Court (formerly Douglas Apartments)	9	Leased	No	Affordable housing
Spruce Street Apartments	10	Leased	No	Affordable housing
St. Charles Apartments	29	Leased	No	Permanent supportive housing
Starliter Apartments	6	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2022	RAD?	Description of project
Stone Avenue Townhomes	4	Leased	No	Affordable housing
Stone Way Apartments	21	Leased	No	Affordable housing
Stone Way Apartments	14	Leased	No	Service-enriched for homeless families (with at least one minor)
Sylvia Odom's Place	64	Leased	No	Permanent supportive housing graduates
Tamarack Place	20	Leased	No	Affordable housing
Traugott Terrace	40	Leased	No	Service-enriched for homeless individuals in recovery
Tyree Scott Apartments	10	Leased	No	Affordable housing
Tyree Scott Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase I	17	Leased	No	Affordable housing
Views on Madison Phase I	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase II	7	Leased	No	Affordable housing
Villa Park	5	Leased	No	Affordable housing
Village Square II Apartments	31	Leased	No	Affordable housing
Vivian McLean Place Apartments	4	Leased	No	Affordable housing
Weller Apartments	47	Leased	No	Affordable housing
Westwood Heights East	22	Leased	No	Affordable housing
WSAH (formerly Longfellow/Wisteria)	19	Leased	No	Affordable housing
Yesler Court	5	Leased	No	Affordable housing
YWCA Women's Residence	15	Leased	No	Permanent supportive housing for women
YWCA Women's Residence	38	Leased	No	Permanent supportive housing for women

**Total planned existing project-based vouchers**

**4,284**

## Appendix B: Local asset management plan

### I. Introduction

The First Amendment to the Amended and Restated Moving to Work (MTW) Agreement (“First Amendment”) allows the Seattle Housing Authority (SHA or the Authority) to develop a local asset management program (LAMP) for its Public Housing program. The agency is to describe its LAMP in its next MTW Annual Plan, to include a description of how it is implementing project-based management, budgeting, accounting and financial management and any deviations from HUD’s asset management requirements. Under the First Amendment, SHA agreed its cost accounting and financial reporting methods would comply with the federal Office of Management and Budget (OMB) Super Circular at Title 2 CFR Part 200 (formerly A-87 requirements) and agreed to describe its cost accounting plan as part of its LAMP, including how the indirect service fee is determined and applied. The materials herein fulfill SHA’s commitments.

### II. Framework for SHA’s local asset management program

#### A. Mission and Values

The City of Seattle established SHA under State of Washington enabling legislation in 1939. SHA provides affordable housing or rental assistance to over 37,700 low-income people (representing nearly 18,000 households), through units SHA owns and operates or for which SHA serves as the general partner of a limited partnership and as managing agent, and through rental assistance in the form of tenant-based, project-based and provider-based vouchers. SHA is also an active developer of low-income housing. SHA redevelops and rehabilitates communities and preserves existing assets. SHA operates according to the following mission and values:

##### *Our mission*

*Our mission is to enhance the Seattle community by creating and sustaining decent, safe and affordable living environments that foster stability and increase self-sufficiency for people with low-income.*

##### *Our values*

*As stewards of the public trust, we pursue our mission and responsibilities in a spirit of service, teamwork, and respect. We embrace the values of excellence, collaboration, innovation, and appreciation.*

SHA owns and operates housing in neighborhoods throughout Seattle. These include the four large family communities of NewHolly and Rainier Vista in Southeast Seattle, High Point in West Seattle, and Yesler Terrace in Central Seattle. In the past 22 years, SHA has undertaken redevelopment or rehabilitation of all four family communities, a new family community in Lake City and 23 of our public housing high-rise buildings, using mixed financing with low-income housing tax credit limited partnerships and/or ARRA funds. During 2023, SHA will be the general partner in 17 limited partnerships.

## B. Overarching policy and cost objectives

SHA's mission and values are embraced by our employees and ingrained in our policies and operations. They are the prism through which we view our decisions and actions and the cornerstone to which we return in evaluating our results. In formulating SHA's Local Asset Management Program, our mission and values have served as the foundation of our policy/cost objectives and the key guiding principles that underpin SHA's LAMP.

Consistent with requirements and definitions of 2 CFR 200, SHA's LAMP is led by three overarching policy/cost objectives:

- ◇ *Cost effective affordable housing:* To enhance the Seattle community by creating, operating and sustaining decent, safe and affordable housing and living environments for low-income people, using cost-effective and efficient methods.
- ◇ *Housing opportunities and choice:* To expand housing opportunities and choice for low-income individuals and families through creative and innovative community partnerships and through full and efficient use of rental assistance programs.
- ◇ *Resident financial security and/or self-sufficiency:* To promote financial security or economic self-sufficiency for low-income residents, as individual low-income tenants are able, through a network of training, employment services and support.

## C. Local Asset Management Program – Eight Guiding Principles

Over time and with extensive experience, these cost objectives have led SHA to define an approach to our LAMP that is based on the following principles:

1. *In order to most effectively serve low-income individuals seeking housing, SHA will operate its housing and housing assistance programs as a cohesive whole, as seamlessly as feasible.*

We recognize that different funding sources carry different requirements for eligibility and different rules for operations, financing, and sustaining low-income housing units. It is SHA's job to make funding and administrative differences as invisible to tenants/participants as we can, so low-income people are best able to navigate the housing choices and rental assistance programs SHA offers. We also consider it SHA's job to design our housing operations to bridge differences among programs/fund sources, and to promote consolidated requirements, wherever possible. It is also incumbent on us to use our own and MTW authority to minimize administrative inefficiencies from differing rules and to seek common rules, where possible, to enhance cost effectiveness, as well as reduce the administrative burden on tenants.

This principle has led to several administrative successes, including use of a single set of admissions and lease/tenant requirements for Low Income Public Housing and project-based Housing Choice Voucher tenants in the same property. Similarly, we have joint funder agreements for program and financial reporting and inspections on low-income housing projects with multiple local and state funders.

An important corollary is SHA's involvement in a community-wide network of public, non-profit, and for-profit housing providers, service and educational providers, and coalitions designed to rationalize and maximize housing dollars – whatever the source – and supportive services and educational/training resources to create a comprehensive integrated housing + services program city and county-wide. So, not only is SHA's LAMP designed to create a cohesive whole of SHA housing programs, but it is also intended to be flexible enough to be an active contributing partner in a city-wide effort to provide affordable housing and services for pathways out of homelessness and out of poverty.

2. *In order to support and promote property performance and financial accountability at the lowest appropriate level, SHA will operate a robust project and portfolio-based budgeting, management, and reporting system of accountability.*

SHA has operated a property/project-based management, budgeting, accounting and reporting system for the past twenty plus years. Our project-based management systems include:

- Annual budgets developed by on-site property managers and reviewed and consolidated into portfolio requests by area or housing program managers.
- Adopted budgets at the property and/or community level that include allocation of subsidies, where applicable, to balance the projected annual budget. This balanced property budget becomes the basis for assessing actual performance.
- Monthly property-based financial reports comparing year-to-date actual to budgeted performance for the current and prior years.
- Quarterly portfolio reviews are conducted with the responsible property manager(s) and the area or housing program managers, with SHA's Asset Management Team, including Budget and Accounting staff.

SHA applies the same project/community-based budgeting system and accountability to its non-federal programs.

3. *To ensure best practices across SHA's housing portfolios, SHA's Asset Management Team provides the forum for review of housing operations policies, practices, financial performance, capital requirements, and assessment of best practices and performance among SHA, other housing authorities, and other housing providers.*

A key element of SHA's LAMP is the Asset Management Team (AM Team) comprised of upper and property management staff from housing operations, asset management, property services, executive, legal, finance and budget, community services, communications, and rental assistance. This interdisciplinary AM Team meets bi-weekly throughout the year and addresses:

- All critical policy and program issues facing individual properties, applying to a single unit or multiple portfolios, from rent policy to smoke-free buildings to rules for in-home businesses.
- Portfolio reviews and follow-up, where the team convenes to review with property management staff how well properties are operating in relation to common performance measures (e.g. occupancy, rent collections and receivables, vacancy rates, turnover time), how the property is doing in relation to budget and key reasons for deviations and property manager projections and/or concerns about the future.



- Annual assessment of capital repair and improvement needs of each property with property managers and area portfolio administrators in relation to five-year projections of capital preservation needs. This annual process addresses the capital needs and priorities of individual properties and priorities across portfolios.
- Review and preparation of the MTW Annual Plan and Report, where key issues for the future are identified and discussed, priorities for initiatives to be undertaken are defined, and where evaluation of MTW initiatives are reviewed and next steps determined.

The richness and legitimacy of the AM Team processes result directly from the diverse Team composition, the open and transparent consideration of issues, the commitment of top management to participate actively on the AM Team and the record of follow-up and action on issues considered by the AM Team.

- 4. To ensure that the Authority and residents reap the maximum benefits of cost-effective economies of scale, certain direct functions will be provided centrally.*

Over time, SHA has developed a balance of on-site capacity to perform property manager, resident manager and basic maintenance/handyperson services, with asset preservation services performed by a central capacity of trades and specialty staff. SHA's LAMP reflects this cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, pest control, and asset preservation as direct costs to properties. Even though certain maintenance functions are performed by central trade crews, the control remains at the property level, as it is the property manager and/or area or program manager who calls the shots as to the level of service required from the "vendor" – the property services group – on a unit turnover, site landscaping, and maintenance and repair work orders. Work is not performed at the property by the central crews without the prior authorization of the portfolio manager or his/her designee. And all services are provided on a fee for service basis.

Similarly, SHA has adopted procurement policies that balance the need for expedient and on-site response through delegated authorization of certain dollar levels of direct authority for purchases, with Authority-wide economies of scale and conformance to competitive procurement procedures for purchases/work orders in excess of the single bidder levels. Central procurement services are part of SHA's indirect services fee.

- 5. SHA will optimize direct service dollars for resident/tenant supportive services by waiving indirect costs that would otherwise be borne by community service programs and distributing the associated indirect costs to the remaining direct cost centers.*

A large share of tenant/resident services are funded from grants and foundations and these funds augment local funds to provide supportive services and self-sufficiency services to residents. In order to optimize available services, the indirect costs will be supported by housing and housing choice objectives.

There are myriad of reasons that led SHA to this approach:

- Most services are supported from public and private grants and many of these don't allow indirect cost charges as part of the pool of eligible expenses under the grant.



- SHA uses local funds from operating surpluses to augment community services funding from grants; these surpluses are derived from operations where indirect services have already been charged.
  - SHA's community services are very diverse, from recreational activities for youth to employment programs to translation services. This diversity makes a common basis for allocating indirect services problematic.
  - Most importantly, there is a uniform commitment on the part of housing and housing choice managers to see dollars for services to their tenants/participants maximized. There is unanimous agreement that these program dollars not only support the individuals served but serve to reduce property management costs they would experience from idle youth and tenants struggling on their own to get a job.
6. *SHA will achieve administrative efficiencies, maintain a central job cost accounting system for capital assets, and properly align responsibilities and liability by allocating capital assets/improvements to the property level only upon completion of capital projects.*

Development and capital projects are managed through central agency units and can take between two and five or more years from budgeting to physical completion. Transfer of fixed assets only when they are fully complete and operational best aligns responsibility for development and close-out vs. housing operations.

The practice of transferring capital assets when they are complete and operational, also best preserves clear lines of accountability and responsibility between development and operations; preserves the relationship and accountability of the contractor to the project manager; aligns with demarcations between builders risk and property insurance applicability; protects warranty provisions and requirements through commissioning; and, maintains continuity in the owner's representative to ensure all construction contract requirements are met through occupancy permits, punch list completion, building systems commissioning, and project acceptance.

7. *SHA will promote service accountability and incorporate conservation incentives by charging fees for service for selected central services.*

This approach, rather than an indirect cost approach, is preferred where services can be differentiated on a clear, uniform, and measurable basis. This is true for information technology services and for Fleet Management services. The costs of information technology services, hardware and software, are distributed based on department headcount, number of hardware equipment devices (Wise; PC; laptops and tablets) and by employee job function, i.e. field employees were weighted much less than office staff.

The Fleet service fee encompasses vehicle insurance, maintenance, and replacement. Fuel consumption is a direct cost to send a direct conservation signal. The maintenance component of the fleet charge is based on a defined maintenance schedule for each vehicle given its age and usage. The replacement component is based on expected life of each vehicle in the fleet, a defined replacement schedule, and replacement with the most appropriate vehicle technology and conservation features.

8. *SHA will use its MTW block grant authority and flexibility to optimize housing opportunities provided by SHA to low-income people in Seattle.*

SHA's flexibility to use MTW Block Grant resources to support its low-income housing programs is central to our Local Asset Management Program (LAMP). SHA will exercise our contractual authority to move our MTW funds and project cash flow among projects and programs, including Indirect Services Fee calculation, as the Authority deems necessary to further our mission and cost objectives. MTW flexibility to allocate MTW Block Grant revenues among the Authority's housing and administrative programs enables SHA to balance the mix of housing types and services to different low-income housing programs and different groups of low-income residents. It enables SHA to tailor resource allocation to best achieve our cost objectives and therefore maximize our services to low-income residents and applicants having a wide diversity of circumstances, needs, and personal capabilities. As long as the ultimate purpose of a grant or program is low-income housing, it is eligible for MTW funds.

### **III. SHA's Local Asset Management Program (LAMP) Implementation**

#### **A. Comprehensive Operations**

Consistent with the guiding principles above, a fundamental driver of SHA's LAMP is its comprehensive application to the totality of SHA's MTW program. SHA's use of MTW resource and regulatory flexibility and SHA's LAMP encompass our entire operations.

Accordingly:

- We apply our indirect service fees to all our housing and rental assistance programs.
- We expect all our properties, regardless of fund source, to be accountable for property-based management, budgeting, and financial reporting.
- We exercise MTW authority to assist in creating management and operational efficiencies across programs and to promote applicant and resident-friendly administrative requirements for securing and maintaining their residency.
- We use our MTW block grant flexibility across all of SHA's housing programs and activities to create the whole that best addresses our needs at the time.
- We will have the option to exercise MTW authority to balance indirect service fees when expenses exceed revenues or when revenues exceed expenses in the CSOC. MTW funding will assist in balancing or evening out the fee cost to communities, especially in the event of unforeseen circumstances like a pandemic that creates new costs and curtails employment and rehiring opportunities to low-income residents.

SHA's application of its LAMP and indirect service fees to its entire operations is more comprehensive than HUD's asset management system. HUD addresses fee for service principally at the low-income public housing property level and does not address SHA's comprehensive operations, which include other housing programs, business activities, and component units.

#### **B. Project-based Portfolio Management**

We have reflected in our guiding principles above the centrality of project/property-based and program-based budgeting, management, reporting and accountability in our asset management

program and our implementing practices. We also assign priority to our multi-disciplinary central Asset Management Team in its role to constantly bring best practices, evaluations, and follow-up to inform SHA's property management practices and policies. Please refer to the section above to review specific elements of our project-based accountability system.

A fundamental principle we have applied in designing our LAMP is to align responsibility and authority and to do so at the lowest appropriate level. Thus, where it makes the most sense from the standpoints of program effectiveness and cost efficiency, the SHA LAMP assigns budget and management accountability at the property level. We are then committed to providing property managers with the tools and information necessary for them to effectively operate their properties and manage their budgets.

We apply the same principle of aligning responsibility and accountability for those services that are managed centrally, and, where those services are direct property services, such as landscaping, decorating, or specialty trades work, we assign the ultimate authority for determining the scope of work to be performed to the affected property manager.

In LIPH properties, we budget subsidy dollars with the intent that properties will break even with actual revenues and expenses. Over the course of the year, we gauge performance at the property level in relation to that aim. When a property falls behind, we use our quarterly portfolio reviews to discern why and agree on corrective actions and then track their effectiveness in subsequent quarters. We reserve our MTW authority to move subsidy and cash flow among our LIPH properties based on our considered assessment of reasons for surplus or deficit operations. We also use our quarterly reviews to identify properties whose performance warrants placement on a "watch" list.

## **C. Cost Allocation Approach**

### *Classification of Costs*

Under 2 CFR 200, there is no one universal rule for classifying certain costs as either direct or indirect under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost be treated consistently in like circumstances, as either a direct or an indirect cost. Consistent with 2 CFR 200 cost principles, SHA has identified all of its direct costs and segregated all its costs into pools, as either a direct or an indirect cost pool. We have further divided the indirect services pool to assign costs as "equal burden" or hard housing unit based, as described below.

### *Cost Objectives*

2 CFR 200 defines cost objective as follows: *Cost objective means a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred.* The Cost Objectives for SHA's LAMP are the three overarching policy/cost objectives described earlier:

- Cost Effective Affordable Housing
- Housing Opportunities and Choice
- Resident Financial Security and/or Self-Sufficiency

Costs that can be identified specifically with one of the three objectives are counted as a direct cost to that objective. Costs that benefit more than one objective are counted as indirect costs. Attachment 1 is a graphic representation of SHA's LAMP, with cost objectives, FDS structure, and SHA Funds.

### *SHA Direct Costs*

2 CFR 200 defines direct costs as follows: *Direct costs are those that can be identified specifically with a particular final cost objective.* SHA's direct costs include but are not limited to:

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Contract costs readily identifiable with delivering housing assistance to low-income families</li> <li>• Housing Assistance Payments, including utility allowances, for vouchers</li> <li>• Utilities</li> <li>• Surface Water Management fee</li> <li>• Insurance</li> <li>• Bank charges</li> <li>• Property-based audits</li> <li>• Staff training</li> <li>• Interest expense</li> <li>• Information technology fees</li> <li>• Portability administrative fees</li> <li>• Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities</li> <li>• Operating costs directly attributable to operating SHA-owned properties</li> <li>• Fleet management fees and fuel costs</li> <li>• Central maintenance services for unit or property repairs or maintenance</li> <li>• Central maintenance services include, but are not limited to,</li> </ul> | <ul style="list-style-type: none"> <li>landscaping, pest control, and decorating and unit turnover</li> <li>• Operating subsidies paid to mixed income, mixed finance communities</li> <li>• Community Services department costs directly attributable to tenants' services</li> <li>• Gap financing real estate transactions</li> <li>• Acquisition costs</li> <li>• Demolition, relocation, and leasing incentive fees in repositioning SHA-owned real estate</li> <li>• Homeownership activities for low-income families</li> <li>• Leasing incentive fees</li> <li>• Certain legal expenses</li> <li>• Professional services at or on behalf of properties or a portfolio, including security services</li> <li>• Extraordinary site work</li> <li>• Any other activities that can be readily identifiable with delivering housing assistance to low-income families</li> <li>• Any cost identified for which a grant award is made. Such costs will be determined as SHA receives grants</li> <li>• Direct Finance staff costs</li> <li>• Direct area administration staff costs.</li> </ul> |
|---|---|

## *SHA Indirect Costs*

2 CFR 200 defines indirect costs as *those (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.* SHA's indirect costs include, but are not limited to:

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• Executive</li><li>• Communications</li><li>• Most of Legal</li><li>• Development (Most Development staff charge directly to the Development Fund, only certain staff and functions in this department are indirect charges)</li><li>• Finance</li><li>• Purchasing</li></ul> | <ul style="list-style-type: none"><li>• Human Resources</li><li>• Housing Finance and Asset Management (Based on functions, this staff is split among indirect cost, direct charge to the capital budget, and charges to MTW direct property services.)</li><li>• Administration staff and related expenses of the Housing Operations Department that cannot be identified to a specific cost objective.</li></ul> |
|--|--|

## *SHA Indirect Service Fee – Base, Derivation and Allocation*

SHA has established an Indirect Services Fee (IS; ISF) based on anticipated indirect costs for the fiscal year. Per the requirements of 2 CFR 200, the ISF is determined in a reasonable and consistent manner based on total units and leased vouchers. Thus, the ISF is calculated as a per-housing-unit or per-leased-voucher fee per month charged to each program. Please see Attachment 2 to review SHA's Indirect Services Fee Plan.

### *Equitable Distribution Base*

According to 2 CFR 200, *the distribution base may be (1) total direct costs (excluding capital expenditure), (2) direct salaries and wages, or (3) another base which results in an equitable distribution.* SHA has found that unit count and leased voucher is an equitable distribution base when compared to other potential measures. Testing of prior year figures has shown that there is no material financial difference between direct labor dollar allocations and unit allocations. Total units and leased vouchers are a far easier, more direct and transparent, and more efficient method of allocating indirect service costs than using direct labor to distribute indirect service costs. Direct labor has other complications because of the way SHA charges for maintenance services. Using housing units and leased vouchers removes any distortion that total direct salaries and wages might introduce. Units and leased vouchers is an equitable distribution base which best measures the relative benefits.

### *Derivation and Allocation*

According to 2 CFR 200, where a grantee agency's indirect costs benefit its major functions in varying degrees, such costs shall be accumulated into separate cost groupings. Each grouping shall then be allocated individually to benefitted functions by means of a base which best measures the relative benefits. SHA divides indirect costs into two pools, "Equal Burden" costs and "Hard Unit" costs. Equal Burden costs are costs that equally benefit leased voucher activity and hard, existing housing unit activity. Hard Unit costs primarily benefit the hard, existing housing unit activity.

Before calculating the per unit indirect service fees, SHA's indirect costs are offset by designated revenue. Offsetting revenue includes 10 percent of the MTW Capital Grant award, a portion of the developer fee paid by limited partnerships, limited partnership management fees, laundry revenue, dividend or savings from insurance companies and purchasing card discounts for early payment, commuting reimbursements from employees and a portion of Solid Waste's outside revenue.

A per unit cost is calculated using the remaining net indirect costs divided by the number of units and the number of leased vouchers. For the 2023 budget the per unit per month (PUM) cost for housing units is \$68.44 and for leased vouchers is \$24.60

#### *Annual Review of Indirect Service Fee Charges*

SHA will annually review its indirect service fee charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis. To achieve a breakeven fund, any deficit or excess can be balanced by using the MTW fund, as allowed under SHA's fund flexibility provisions.

#### **D. Differences – HUD Asset Management vs. SHA Local Asset Management Program**

Under the First Amendment, SHA is allowed to define costs differently than the standard definitions published in HUD's Financial Management Guidebook pertaining to the implementation of 24 CFR 990. SHA is required to describe in this MTW Annual Plan differences between our Local Asset Management Program and HUD's asset management program. Below are several key differences, with additional detail reflected in Attachment 3 to this document:

- SHA determined to implement an indirect service fee that is much more comprehensive than HUD's asset management system. HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Low-Income Public Housing (LIPH) property level. SHA's LAMP is much broader and includes local housing and other activities not found in traditional HUD programs. SHA's LAMP addresses the entire SHA operation.
- SHA has defined its cost objectives at a different level than HUD's asset management program. SHA has defined three cost objectives under the umbrella of the MTW program, which is consistent with the issuance of the CFDA number and with the current MTW Contract Agreement (expires 12/31/28). HUD defined its cost objectives at the property level and SHA defined its cost objectives at the program level. Because the cost objectives are defined differently, direct and indirect costs will be differently identified, as reflected in our LAMP.
- HUD's rules are restrictive regarding cash flow between projects, programs, and business activities. SHA intends to use its MTW resources and regulatory flexibility to move its MTW funds and project cash flow among projects without limitation and to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- HUD intends to maintain all maintenance staff at the property level. SHA's LAMP reflects a cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, and asset preservation as direct costs to properties.
- HUD's asset management approach records capital project work-in-progress quarterly. SHA's capital projects are managed through central agency units and can take between



two and five or more years from budgeting to physical completion. Transfer of fixed assets only when they are fully complete and operational best aligns responsibility for development and close-out vs. housing operations.

Please consult *Attachment 3* for additional detailed differences between HUD's asset management program and SHA's LAMP. However, detailed differences for SHA's other housing programs are not provided.

### *Balance Sheet Accounts*

Most balance sheet accounts will be reported in compliance with HUD's Asset Management Requirements and some will deviate from HUD's requirements, as discussed below:

- Cash
- Petty Cash
- Prepaid Expenses and Deferred Charges
- Materials Inventory
- Contract Retention
- Other Post-Employment Benefits (OPEB) Liability
- Pension Liability or Asset
- Deferred Inflows and Deferred Outflows

SHA will deviate from HUD's asset management requirements by reporting the above account balances as assets or liabilities maintained centrally. They will not be reported by AMP or program. Through years of practice, we believe that maintaining these accounts centrally has proven to be the most cost effective and least labor-intensive method. Although these balance sheet accounts are proposed to be maintained centrally, the related expenses will continue to be reported as an expense to the appropriate program, department and/or AMP, based on income and expense statements. It is important to note that maintaining the above balance sheet accounts centrally will not diminish SHA's obligation or ability to effectuate improved and satisfactory operations and to develop and adhere to its asset management plan. This is consistent with the new Catalog of Federal Domestic Assistance (CFDA) number for the MTW program.

### **Enclosures:**

**Attachment 1: Structure of SHA's LAMP and FDS Reporting**

**Attachment 2: 2023 Indirect Services Fee Plan**

**Attachment 3: Matrix: HUD vs. SHA Indirect and Direct Costs**



## Appendix B - Attachment 1: Structure of SHA's LAMP and FDS Reporting

*Local Asset Management Program:  
Use MTW flexibility to operate housing and assistance programs as seamlessly as feasible.*

Direct cost objectives		Housing						Rental assistance	Community services
FDS columns	MTW	Indirect services costs	AMPs	Other housing	Other business activities	LP component units	MF developments & home ownership	Other housing	Other business activities
<b>Funds</b>	Capital WIP unallocated costs IT capital projects 100 480	400	Various, including LIPH portion of LP CUs	104 122 127 137 193/216 352-354 357 591 750 754	190 194 195 198 199 450 470	17 LPs LIPH portion reported in AMPs	700 704-709 711-712 718-719 723-749 848	139 168	125 CS grants

Fund name	Fund number	Fund name	Fund number	Fund name	Fund number
General	100	Local housing program	193/216	Indirect services costs	400
Seattle Senior Housing	104	House ownership	194	Impact Property Services	450
Market Terrace	122	SHA land and parks	195	Impact Property Management	470
Bayview Tower	127	Development	198	MTW fund	480
Ref 37	137	Wakefield	199	Baldwin	591
Housing Choice Vouchers	139	Holly II and III	352-353	New acquisitions	750
Mod Rehab	168	Rainier I	354	Northgate	754
Local fund	190	High Point North	357	MF developments & home ownership	700-749, 848

## Appendix B - Attachment 2: 2023 Indirect Cost Allocation Plan

Department	2023 Proposed expenses	All units	Hard units only
<b>Executive total</b>	3,030,126	3,030,126	
<b>Asset Management</b>	416,615		369,034
<b>Finance</b>	5,079,516	5,079,516	
<b>Housing Operations</b>	2,816,973		2,816,973
<b>HCV</b>	93,313	93,313	
<b>HR: Allocated based on staff</b>	3,570,039	1,277,780	2,292,259
<b>Prior year inc./exp. reconciliation – expense</b>			
<b>Total</b>	<b>\$ 15,006,582</b>	<b>\$ 9,480,735</b>	<b>\$ 5,525,847</b>
<b>Percentage</b>	<b>100%</b>	<b>63%</b>	<b>37%</b>
Less fixed revenues	(6,642,353)		
<b>Remaining OH* to allocate PUM</b>	<b>\$8,364,229</b>	<b>\$5,284,284</b>	<b>\$3,079,945</b>
<b>Units</b>		17,902	5,854
<b>PUM cost</b>		\$24.60	\$43.84
<b>PUM cost to equal burden units</b>			<b>\$24.60</b>
<b>PUM fee to hard units (all units + hard units only)</b>			<b>\$68.44</b>

\*OH = Overhead

Indirect revenue		2023 Estimate
Capital grant admin		1,690,000
MTW adjustment		2,400,000
10% of developer fee cash		166,248
LP management fees		1,604,367
Laundry fee revenue		81,738
Insurance dividend		450,000
City benefit reimbursement		0
Solid waste services		250,000
<b>Total fixed revenues</b>		<b>\$ 6,642,353</b>

Unit summary		Total
Housing units		5,854
Total vouchers	12,504	
Leased vouchers at 95.4% of utilization		11,929
Total Mod Rehab	238	
Divide by two for work equivalency		119
<b>Total units</b>		<b>17,902</b>

## Indirect Services Fee by Community

Indirect services rates	
Equal burden units	24.60
Hard units	68.44

Low Income Public Housing			
Development no.	Community name	Units	2023 Allocation
9	Jefferson Terrace	21	17,247
13	Olive Ridge	105	86,234
15	Bell Tower	120	98,554
17	Denny Terrace	220	180,682
23	Westwood Heights	130	106,766
31	Tri Court	87	71,451
37	Jackson Park Village	41	33,672
38	Cedarvale Village	24	19,711
41	Holly Court	66	54,204
50	Scattered Sites	2	1,643
51	Scattered Sites	121	99,375
52	Scattered Sites	15	12,319
53	Scattered Sites	112	91,983
54	Scattered Sites	5	4,106
55	Scattered Sites	128	105,124
56	Scattered Sites	28	22,996
57	Scattered Sites	73	59,953
86	High Rise Rehab Phase I	704	578,181
87	High Rise Rehab Phase II	690	566,683
88	High Rise Rehab Phase III	587	482,091
92	Seattle Senior Housing North	231	189,716
93	Seattle Senior Housing South	138	113,337
94	Seattle Senior Housing Central	246	202,035
95	Seattle Senior Housing City Funded	345	283,342
<b>Total Low Income Public Housing</b>		<b>4,239</b>	<b>3,481,406</b>
Other Housing Programs			
Development no.	Community name	Units	2023 Allocation
127	Bayview Tower	100	82,128
201	127th & Greenwood	6	4,928
139	Rental Assistance	11,929	3,521,147
168	Mod Rehab	119	35,127
193	Local Housing Program	621	510,015
354	Rainier Vista I - Escallonia	184	151,116
357	High Point N	344	282,520
234	Ritz	30	24,638
352	New Holly II - Othello	96	78,843

353	NewHolly III - Desdemona	219	179,860
591	Baldwin Apartments	15	12,319
<b>Total Other Housing Programs</b>		<b>13,663</b>	<b>4,882,641</b>
<b>Total Management Fee</b>		<b>17,902</b>	<b>8,364,047</b>

Limited Partnership Units			
Development no.	Community name	Units	2023 Allocation
089	731 Tamarack (RV)	83	63,883
090	736 RV III Northeast	118	92,536
085	733 High Point S	256	200,755
091	727 Lake City Village	86	56,760
<b>Total HOPE VI Limited Partnerships</b>		<b>543</b>	<b>413,934</b>
Restricted Fee Units			
Development no.	Community name	Units	2023 Allocation
292	734 South Shore Apts fka Douglas	44	22,889
738	738 1105 E Fir/Kebero	103	80,773
739	739 Leschi House	69	52,537
743	743 Raven LP	83	65,089
744	744 Hoa Mai Gardens	111	82,451
745	745 Red Cedar	119	83,324
746	746 Holly Park I Re-Redevelopment	305	234,862
747	747 West Seattle LP	204	156,084
749	Hinoki LP	136	104,220
753	Jefferson Terrace	170	126,480
848	SPACE SS	228	181,725
<b>Total Restricted Units</b>		<b>1,572</b>	<b>1,190,434</b>
<b>Total</b>		<b>2,115</b>	<b>1,604,368</b>

## Appendix B - Attachment 3: Matrix: HUD vs. SHA Indirect and Direct Costs

Matrix: HUD's Tables 7.1: Fee/indirect expense  
HUD vs. SHA Local Asset Management Program (LAMP)

Low-income public housing			
Fee/indirect expense per HUD		Fee/indirect expense per SHA LAMP	
1.	Actual personnel costs for individuals assigned to the following positions:	1.	Actual personnel costs for individuals assigned to the following positions:
	<ul style="list-style-type: none"> <li>Executive direct and support staff</li> </ul>		<ul style="list-style-type: none"> <li>Executive direct and support staff</li> </ul>
	<ul style="list-style-type: none"> <li>Human Resources staff</li> </ul>		<ul style="list-style-type: none"> <li>Human Resources staff</li> </ul>
	<ul style="list-style-type: none"> <li>Regional managers</li> </ul>		
	<ul style="list-style-type: none"> <li>Corporate legal staff</li> </ul>		<ul style="list-style-type: none"> <li>Corporate legal staff</li> </ul>
	<ul style="list-style-type: none"> <li>Finance, accounting and payroll staff</li> </ul>		<ul style="list-style-type: none"> <li>Finance, accounting and payroll staff, except non-supervisory accounting staff (considered front-line bookkeepers)</li> </ul>
	<ul style="list-style-type: none"> <li>IT staff including Help Desk</li> </ul>		<ul style="list-style-type: none"> <li>Separate IT Fee for Service</li> </ul>
	<ul style="list-style-type: none"> <li>Risk Management staff</li> </ul>		<ul style="list-style-type: none"> <li>Risk Management staff</li> </ul>
	<ul style="list-style-type: none"> <li>Centralized procurement staff</li> </ul>		<ul style="list-style-type: none"> <li>Most centralized procurement staff</li> </ul>
	<ul style="list-style-type: none"> <li>Quality control staff, including quality control inspections</li> </ul>		
2.	Purchase and maintenance of COCC arrangements, equipment, furniture and services	2.	Purchase and maintenance of indirect services (IS) arrangements, equipment, furniture and services
3.	Establishment, maintenance, and control of an accounting system adequate to carryout accounting/bookkeeping for the AMPs	3.	Establishment, maintenance, and control of an accounting system adequate to carryout accounting/bookkeeping for the AMPs
4.	Office expense including office supplies, computer expense, bank charges, telephone, postage, utilities, fax and office rent related to the general maintenance and support of COCC	4.	Office expense including office supplies, computer expense, bank charges, telephone, postage, utilities, fax and office rent related to the general maintenance and support of IS.
5.	The cost of insurance related to COCC buildings, equipment, personnel to include property, auto, liability E&O and casualty.	5.	The cost of insurance related to COCC buildings, equipment, personnel to include property, auto, liability E&O and casualty.
6.	Work with auditors for audit preparation and review of audit costs associated with the COCC.	6.	Work with auditors for audit preparation and review of audit costs associated with the IS.
7.	Central servers and software that support the COCC (not projects)	7.	Central servers and software that support the IS (not projects)

Low-income public housing			
Fee/indirect expense per HUD		Fee/indirect expense per SHA LAMP	
8.	Commissioners' stipend and non-training travel.	8.	Commissioners' stipend and non-training travel.
9.	Commissioners' training that exceed HUD standards	9.	Commissioners' training that exceed HUD standards
10.	The cost of a central warehouse, unless, with HUD approval, the Agency can demonstrate that the costs of maintaining this warehouse operation, if included with the costs of the goods purchased, are less than what the project would otherwise incur if the goods were obtained by on-site staff.	10.	The cost of a central warehouse, unless, with HUD approval, the Agency can demonstrate that the costs of maintaining this warehouse operation, if included with the costs of the goods purchased, are less than what the project would otherwise incur if the goods were obtained by on-site staff.

Housing Choice Voucher			
Fee/indirect expense per HUD		Fee/indirect expense per SHA LAMP	
1.	A share of the personnel costs for HCV staff assigned to the COCC.	1.	A share of the personnel costs for HCV staff assigned to Indirect Services ("IS"). Some executive staff costs allocated to IS.
2.	Establish, maintain and control an accounting system adequate to carryout accounting/ bookkeeping for the HCV program	2.	Establish, maintain and control an accounting system adequate to carryout accounting/ bookkeeping for the HCV program
3.	General maintenance of HCV books and records	3.	General maintenance of HCV books and records
4.	Supervision by COCC management staff of overall HCV program operations	4.	Supervision by IS management staff of overall HCV program operations
5.	Procurement	5.	Centralized Procurement staff
6.	Preparation of monitoring reports for internal and external use.	6.	Preparation of monitoring reports for internal and external use.
7.	Preparation, approval and distribution of HCV payments, not HAP	7.	Preparation, approval and distribution of HCV payments, not HAP
8.	COCC staff training, and ongoing certifications related to HCV program.	8.	IS staff training, and ongoing certifications related to HCV program. Certifications are an ongoing cost of keeping trained staff.
9.	Travel for COCC staff for training, etc. related to HCV program	9.	Travel for IS staff for training, etc. related to HCV program
10.	COCC staff attendance at meetings with landlords, tenants, others regarding planning, budgeting, and program review.	10.	IS staff attendance at meetings with landlords, tenants, others regarding planning, budgeting, and program review.

Housing Choice Voucher			
Fee/indirect expense per HUD		Fee/indirect expense per SHA LAMP	
11.	Work with auditors and audit preparation.	11.	Work with auditors and audit preparation.
12.	Indirect cost allocations imposed on the HCV program by a higher level of local government.	12.	Indirect cost allocations imposed on the HCV program by a higher level of local government.
13.	Hiring, supervision and termination of front-line HCV staff.	13.	Hiring, supervision and termination of front-line HCV staff.
14.	Preparation and submission of HCV program budgets, financial reports, etc. to HUD and others.	14.	Preparation and submission of HCV program budgets, financial reports, etc. to HUD and others.
15.	Monitoring and reporting on abandoned property as required by states.	15.	Monitoring and reporting on abandoned property as required by states.
16.	Investment and reporting on HCV proceeds.	16.	Investment and reporting on HCV proceeds.
17.	Storage of HCV records and adherence to federal and/or state records retention requirements.	17.	Storage of HCV records and adherence to federal and/or state records retention requirements.
18.	Development and oversight of office furniture, equipment and vehicle replacement plans.	18.	Development and oversight of office furniture, equipment and vehicle replacement plans.
19.	Insurance costs for fidelity or crime and dishonesty coverage for COCC employees based on a reasonable allocation method.	19.	Insurance costs for fidelity or crime and dishonesty coverage for IS employees based on a reasonable allocation method.
20.	Commissioners' stipend and non-training travel.	20.	Commissioners' stipend and non-training travel.
21.	Commissioners' training that exceed HUD standards	21.	Commissioners' training that exceed HUD standards



Matrix: HUD's Tables 7.2: Direct expense  
HUD vs. SHA Local Asset Management Program (LAMP)

Low-income public housing			
Direct expense per HUD		Direct expense per SHA LAMP	
1.	Actual personnel costs of staff assigned directly to AMP sites	1.	Actual personnel costs of staff assigned directly to AMP sites
2.		2.	Area management site costs allocated to AMPs within area
3.		3.	Direct procurement staff
4.	Repair & maintenance costs, including:	4.	Repair & maintenance costs, including:
	<ul style="list-style-type: none"> <li>Centralized maintenance provided under fee for service</li> </ul>		<ul style="list-style-type: none"> <li>Centralized maintenance provided under fee for service (IPS)</li> </ul>
	<ul style="list-style-type: none"> <li>Maintenance supplies</li> </ul>		<ul style="list-style-type: none"> <li>Maintenance supplies</li> </ul>
	<ul style="list-style-type: none"> <li>Contract repairs e.g. heating, painting, roof, elevators on site</li> </ul>		<ul style="list-style-type: none"> <li>Contract repairs e.g. heating, painting, roof, elevators on site</li> </ul>
	<ul style="list-style-type: none"> <li>Make ready expenses, including painting and repairs, cleaning, floor replacements, and appliance replacements;</li> </ul>		<ul style="list-style-type: none"> <li>Make ready expenses, including painting and repairs, cleaning, floor replacements, and appliance replacements;</li> </ul>
	<ul style="list-style-type: none"> <li>Preventive maintenance expenses, including repairs and maintenance, as well as common area systems repairs and maintenance</li> </ul>		<ul style="list-style-type: none"> <li>Preventive maintenance expenses, including repairs and maintenance, as well as common area systems repairs and maintenance</li> </ul>
	<ul style="list-style-type: none"> <li>Maintenance contracts for elevators, boilers, etc.</li> </ul>		<ul style="list-style-type: none"> <li>Maintenance contracts for elevators, boilers, etc.</li> </ul>
	<ul style="list-style-type: none"> <li>Other maintenance expenses, Section 504 compliance, pest</li> </ul>		<ul style="list-style-type: none"> <li>Other maintenance expenses, Section 504 compliance, pest</li> </ul>
5.	Utility costs	5.	Utility costs
6.	Costs related to maintaining a site-based office, including IT equipment and software license allocations.	6.	Costs related to maintaining a site-based office, including IT equipment and software license allocations.
7.	Advertising costs specific to AMP, employees or other property	7.	Advertising costs specific to AMP, employees or other property
8.	PILOT	8.	PILOT
9.	All costs of insurance for the AMP	9.	All costs of insurance for the AMP
10.	Professional services contracts for audits, rehab and inspections specific to the project.	10.	Professional services contracts for audits, rehab and inspections specific to the project.
11.		11.	Inspector costs are allocated to the projects as a direct cost.

Low-income public housing			
Direct expense per HUD		Direct expense per SHA LAMP	
12.	Property management fees, bookkeeping fees, and asset management fees.	12.	Property management fees, bookkeeping fees, and asset management fees.
13.	Certain litigation costs.	13.	Certain litigation costs.
14.	Audit costs (may be prorated)	14.	Only audit costs for component units are allocated to properties
15.	Vehicle expense	15.	Separate Fleet Fee for Service
16.	Staff recruiting and background checks, etc.	16.	Staff recruiting and background checks, etc.
17.	Family self-sufficiency staff and program costs	17.	Family self-sufficiency staff and program costs
18.	Commissioners' training up to a limited amount as provided by HUD	18.	Commissioners' training up to a limited amount as provided by HUD
19.		19.	Building rent

Housing Choice Voucher			
Direct expense per HUD		Direct expense per SHA LAMP	
1.	A share of the personnel costs for HCV staff assigned to the COCC.	1.	A share of the personnel costs for HCV staff assigned to Indirect Services (IS). Some executive staff costs allocated to IS.
2.	Establish, maintain and control an accounting system adequate to carryout accounting/ bookkeeping for the HCV program	2.	Establish, maintain and control an accounting system adequate to carryout accounting/ bookkeeping for the HCV program
3.	General maintenance of HCV books and records	3.	General maintenance of HCV books and records
4.	Supervision by COCC management staff of overall HCV program operations	4.	Supervision by IS management staff of overall HCV program operations
5.	Procurement	5.	Centralized Procurement staff
6.	Preparation of monitoring reports for internal and external use.	6.	Preparation of monitoring reports for internal and external use.
7.	Preparation, approval and distribution of HCV payments, not HAP	7.	Preparation, approval and distribution of HCV payments, not HAP
8.	COCC staff training, and ongoing certifications related to HCV program.	8.	IS staff training, and ongoing certifications related to HCV program. Certifications are an ongoing cost of keeping trained staff.
9.	Travel for COCC staff for training, etc. related to HCV program	9.	Travel for IS staff for training, etc. related to HCV program
10.	COCC staff attendance at meetings with landlords, tenants, others regarding planning, budgeting, and program review.	10.	IS staff attendance at meetings with landlords, tenants, others regarding planning, budgeting, and program review.

Housing Choice Voucher			
Direct expense per HUD		Direct expense per SHA LAMP	
11.	Work with auditors and audit preparation.	11.	Work with auditors and audit preparation.
12.	Indirect cost allocations imposed on the HCV program by a higher level of local government.	12.	Indirect cost allocations imposed on the HCV program by a higher level of local government.
13.	Hiring, supervision and termination of front-line HCV staff.	13.	Hiring, supervision and termination of front-line HCV staff.
14.	Preparation and submission of HCV program budgets, financial reports, etc. to HUD and others.	14.	Preparation and submission of HCV program budgets, financial reports, etc. to HUD and others.
15.	Monitoring and reporting on abandoned property as required by states.	15.	Monitoring and reporting on abandoned property as required by states.
16.	Investment and reporting on HCV proceeds.	16.	Investment and reporting on HCV proceeds.
17.	Storage of HCV records and adherence to federal and/or state records retention requirements.	17.	Storage of HCV records and adherence to federal and/or state records retention requirements.
18.	Development and oversight of office furniture, equipment and vehicle replacement plans.	18.	Development and oversight of office furniture, equipment and vehicle replacement plans.
19.	Insurance costs for fidelity or crime and dishonesty coverage for COCC employees based on a reasonable allocation method.	19.	Insurance costs for fidelity or crime and dishonesty coverage for IS employees based on a reasonable allocation method.
20.	Commissioners' stipend and non-training travel.	20.	Commissioners' stipend and non-training travel.
21.	Commissioners' training that exceed HUD standards	21.	Commissioners' training that exceed HUD standards

## Appendix C: Compliance documentation

The 2023 Annual MTW Plan includes the following signed documents. Links to blank forms are included for reference where applicable.

SHA Board of Commissioners resolution approving the 2023 Moving to Work Annual Plan for the Seattle Housing Authority

Certifications of Compliance ([Form HUD-50900](#))

Certification of Consistency with the Consolidated Plan ([Form HUD-2991](#))

Certification of Payments ([Form HUD-50071](#))

RESOLUTION NO. 5249

RESOLUTION APPROVING THE 2023 MOVING TO WORK ANNUAL PLAN FOR THE  
SEATTLE HOUSING AUTHORITY

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) has selected the Housing Authority of the City of Seattle (SHA) to participate in the Moving to Work Program (MTW) to design and test new ways of providing housing assistance and services to low-income households;

WHEREAS, as a participant in MTW, SHA is required to develop an MTW Annual Plan for each fiscal year that outlines MTW activities that will be pursued that year along with key operations and financial information;

WHEREAS, the MTW Annual Plan for Fiscal Year 2023 (the “Plan”) must be submitted to HUD by October 18, 2022, in the format outlined in HUD Form 50900 to enable SHA to fully use its MTW flexibility;

WHEREAS, the draft Plan was made available for public comment from August 31, 2022 to October 7, 2022 on SHA’s website and in hard copy form;

WHEREAS, public comment was sought through a variety of formats including a public hearing on the Plan which was held on September 14, 2022;

WHEREAS, comments have been considered and shared with the Board of Commissioners; and

WHEREAS, a Board Resolution approving the Plan and certifying that the Plan complies with MTW agreement requirements must be included in the Plan.

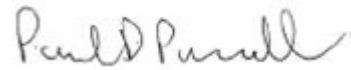
NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Housing Authority of the City of Seattle as follows:

1. The Board of Commissioners approves the Plan and authorizes the Executive Director to finalize and submit the Plan to HUD.
2. The Board of Commissioners certifies that all public notice, public hearing and MTW requirements pertaining to implementation and submission of the Plan have been satisfied and authorizes the Chair of the Board to execute the attached HUD Certification of Compliance with Regulations.
3. The Board of Commissioners authorizes the Executive Director and their designees to make such changes to the Admissions and Continued Occupancy Plan, the Housing Choice Voucher Administrative Plan and any other policy

documents that are necessary or appropriate in such individuals' discretion in order to implement the approved MTW Plan and to give effect to this resolution and the transactions contemplated herein.

4. Any actions of the Authority or its officers prior to the date hereof and consistent with the terms of this resolution are ratified and confirmed.

ADOPTED by a majority of all members of the Board of Commissioners and signed by me in open session in authentication of its passage this 17<sup>th</sup> day of October, 2022.



Chair

CERTIFIED BY:



Secretary/Treasurer

## 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 Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2023), hereinafter referred to as "the Plan", 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 Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (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 Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan 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 Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (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.
- (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 75.
- (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 and implementing regulations at 49 CFR Part 24.



- (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 24 CFR 85.20 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 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan 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 Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Seattle Housing Authority

WA-001

**MTW PHA NAME**

**MTW PHA NUMBER/HA CODE**

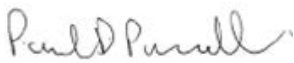
***I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).***

Paul Purcell

Chair, Board of Commissioners

**NAME OF AUTHORIZED OFFICIAL**

**TITLE**



October 17, 2022

**SIGNATURE**

**DATE**

**\* Must be signed by either the Chair 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 Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

**U.S. Department of Housing  
and Urban Development**

**Certification of Consistency Plan  
with the Consolidated Plan  
for the Continuum of Care  
Program Competition**

I certify the proposed activities included in the Continuum of Care (CoC) project application(s) is consistent with the jurisdiction's currently approved Consolidated Plan.

Applicant Name: \_\_\_\_\_

Project Name: \_\_\_\_\_

Location of the Project: \_\_\_\_\_

Name of  
Certifying Jurisdiction: \_\_\_\_\_

Certifying Official  
of the Jurisdiction Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature:  \_\_\_\_\_

Date: \_\_\_\_\_

# Certification of Payments to Influence Federal Transactions

U.S. Department of Housing  
and Urban Development  
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 01/31/2017)

Applicant Name

Program/Activity Receiving Federal Grant Funding

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

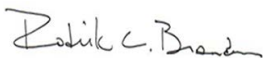
This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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)

Name of Authorized Official

Title

Signature



Date (mm/dd/yyyy)

10/17/2022