



Seattle Housing Authority **Moving to Work** 2023 Annual Report



Submitted March 29, 2024

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For more information on Seattle Housing Authority's 2023 Annual Report or the agency's participation in Moving to Work more broadly, please contact mtw@seattlehousing.org or visit <https://www.seattlehousing.org/about-us/reports/moving-to-work-reports>.

Photo: Mike Fiechtner/Seattle Sounders FC

On the cover: *The Seattle Sounders FC and the RAVE Foundation, the Sounders' philanthropic arm, hosted a celebration for the opening of two RAVE community soccer fields at SHA's NewHolly community. SHA committed land in NewHolly's Central Park for the facility and RAVE, with help from generous donors, built two fields with seating areas and other amenities.*

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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.

In 2023, SHA provided affordable housing to nearly 38,700 people¹ through a variety of opportunities including SHA owned/managed units, subsidized 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 in 2023 were children and 37 percent of participants were seniors or adults with disabilities. About 83 percent of SHA households had annual incomes below 30 percent area median income (AMI) and their annual median household income was \$14,628.

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

Funding for SHA's activities comes from multiple sources including the Moving to Work (MTW) funding flexibility and special purpose funds from the US Department of Housing and Urban Development (HUD), other government grants, tenant rents and revenues from other activities. This Report focuses on activities supported by MTW federal funding.

The information in this Annual Report follows a format prescribed by HUD in [Attachment B](#) to SHA's MTW Standard Agreement.

A. 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 [most recently adopted Strategic Plan](#). The agency is currently undergoing planning for a new Strategic Plan, anticipated to be adopted in 2024.

SHA concentrates our efforts, resources, strategies and partnerships on the following Strategic Directions:

¹ Data as of December 31, 2023.

- 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.

Short-term goals and objectives

In 2023, SHA added one new strategy, Strategy 10.A.03: Mixed-status household subsidy calculation within Activity 10: Local rent policies². This new strategy enables the agency to use a simplified rent calculation for mixed immigration and citizenship status families, such as prorating assistance to these households by applying a reasonable, flat rate supplemental payment. SHA has not implemented this strategy as of March 31, 2024 while the agency undergoes a deep dive into income determination and rental calculation strategies

SHA also updated *Strategy 3.A.03: Reduced frequency of inspections* within *Activity 3: Inspection protocol* in the 2023 MTW Plan. This added the new National Standards for the Physical Inspection of Real Estate (NSPIRE) to the set of standards that may interchangeably be used to inspect SHA's owned/managed properties. As of the time of this report, SHA has implemented NSPIRE in its Public Housing and Housing Choice Voucher programs and is not using MTW to amend the standards. If this changes in the future, SHA will keep HUD apprised in future MTW Plans and Reports.

² This strategy was mislabeled as 10.A.02 in the 2023 Annual Plan. There is already a Strategy 10.A.02 so the error is corrected in this Report and the strategy has been relabeled as 10.A.03.

(II) General operating information

A. Housing stock information

i. Actual new project-based vouchers

SHA's planned new project-based vouchers for 2023 was **101**; the actual number of new project-based vouchers in 2023 was **131**.

Additional details on each new project-based voucher (PBV) allocation can be found in *Appendix B: New project-based voucher units* (beginning on p. 71).

Property name	Number of vouchers newly project-based		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
13th & Fir	0	80	Leased/ Issued	No	13 th and Fir is a part of the Yesler Terrace Redevelopment Plan and was developed by an outside partnership. It has a total of 156 units from studio to 4-bedroom size, of which 80 will receive PBV subsidy. It has an onsite early learning and childcare center in addition to commercial space, interior and exterior common areas, and secure bike and laundry rooms.
Salish Landing	51	51	Leased/ Issued	No	Salish Landing (formerly Lam Bow Apartments) was completely redeveloped following a fire. The redeveloped project consists of 82 total units – 51 PBVs, 30 tax credit units and 1 common area unit. Salish Landing is owned by SHA and the PBV units will be administered under the Streamlined Low-Income Housing Program (<i>Activity 15: Combined program management</i>). Over 80% of the PBV units are family sized.
Sawara Apartments	50	0	N/A	N/A	See table below.

101	131	Planned/actual total vouchers newly project-based
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Please describe differences between the planned and actual number of vouchers newly project based.

13th & Fir (+80): This project was mistakenly left out of the 2023 Annual Plan. The error has been remedied in this Report.

Sawara Apartments (-50): This project did not begin leasing until 2024 and no AHAP was in place by the end of 2023.

ii. Actual existing project-based vouchers

SHA's planned existing project-based vouchers for 2023 was **4,284**; the actual number of existing project-based vouchers at the end of 2023 was **4,253**.

The complete list of actual existing PBV contracts includes more than **190 properties**; details can be found in *Appendix C: Actual existing project-based vouchers* (beginning on p. 75).

Please describe differences between the planned and actual existing number of vouchers project based.

Alderbrook Place (formerly CPC Alderbrook) (-3): Three vouchers were removed from this contract at the request of the provider. The provider indicates they will be closing the contract in 2024.

Bayview Tower (+16): Sixteen vouchers were added to the existing Bayview Tower PBV HAP contract.

CPC 10th Ave. NW (-5): This contract was closed due to attrition.

Golden Sunset (+23): Twenty-three vouchers were added to the existing Golden Sunset PBV HAP contract.

Nhon's House (-1): One voucher was removed from this contract at the request of the provider.

Pat Williams Apartments (+1): One voucher was awarded to the existing Pat Williams Apartments PBV HAP contract.

Pioneer Human Services (-11): This contract was closed due to attrition.

Simons Senior Apartments (+1): One voucher was awarded to the existing Simons Senior Apartments PBV HAP contract.

Sound Mental Health (-6, -20): Two contracts with Sound Mental Health were closed due to attrition resulting in a net reallocation of 26 vouchers.

St. Charles Apartments (-29): This contract was closed at the request of the provider.

Villa Park (+1): One unit was awarded to the existing Villa Park PBV HAP contract.

Weller Apartments (+2): Two units were awarded to the existing Weller Apartments PBV HAP contract.

iii. Actual other changes to MTW housing stock in 2023

None.

iv. General description of all actual capital expenditures during 2023

In 2023, Seattle Housing Authority addressed appliances, electrical upgrades, elevators, exterior rehabilitation, flooring replacement, foundation/structural improvements, HVAC repairs, interior upgrades, life safety, painting, plumbing, roofing, security upgrades and sitework, in addition to other capital projects.

Appliances: Appliances were replaced at units in NewHolly Phase II (WA001000076), NewHolly Phase III (WA001000079) and Rainier Vista Phase I (WA001000080).

Electrical upgrades: Design work was completed for solar panels on the roof of Denny Terrace (WA001000017) and more energy-efficient lighting was installed at a Scattered Site (WA001000050).

Elevators: Elevator upgrades were completed at Fort Lawton Place (WA001000094), Nelson Manor (WA001000095) and various Scattered Sites (WA001000050). An elevator piston replacement was made at Blakeley Manor (WA001000095).

Exteriors: Exterior rehabilitation work was completed at Fort Lawton Place (WA001000094), Gideon-Mathews Gardens (WA001000094) and Primeau Place (WA001000094). Exterior lighting upgrades took place at Beacon Tower (WA001000086) and Olive Ridge (WA001000013). Siding repairs and painting were completed at Holly Court (WA001000041) and various Scattered Sites (WA001000050).

Flooring: Flooring replacement occurred at Fort Lawton Place (WA001000094), Gideon-Mathews Gardens (WA001000094), Rainier Vista Phase I (WA0010000730), Harvard Court (WA001000086), Olmsted Manor (WA001000095) and Pleasant Valley Plaza (WA001000094).

HVAC: Heat pumps were installed in the community rooms at Denny Terrace (WA001000017), Olive Ridge (WA001000013) and Tri-Court (WA001000031). Boilers were replaced at NewHolly Phase II (WA001000076) and NewHolly Phase III (WA001000079).

Interior upgrades: Interior upgrades were completed at Cedarvale Village (WA001000038), NewHolly Phase II (WA001000076) and in two Scattered Site locations (WA001000050) as part of unit upgrades to single family units in the portfolio. MTW funding is also contributing to a major rehabilitation of Jefferson Terrace (WA001000009 pre-disposition), which should complete its two-year construction period in Fall 2024.

Life safety: Fire panels were replaced at Aki Kurose II (WA001000074). Staff also replaced fire sprinkler heads in the garage at Olympic West (WA001000087).

Painting: Interior painting for common areas took place at Beacon Tower (WA001000086), Harvard Court (WA001000086), Sunrise Manor (WA001000092) and University West (WA001000087). Other interiors in the buildings were painted at Fort Lawton Place (WA001000094) and Olmsted Manor (WA001000095). Work to remove ceiling tiles and paint

ceilings was completed at Olympic West (WA001000087). Exterior painting was undergone at two Scattered Sites (WA001000050).

Plumbing: Repairs to water main lines took place at Barton Place (WA001000088) and two Scattered Sites (WA001000050). The drain at University West (WA001000087) was replaced. The water main line was replaced at a Scattered Site (WA001000050). Units at Westwood Heights (WA001000023) had their water valves replaced.

Roofing: Roof replacement occurred at multiple Scattered Sites (WA001000050). Roof repairs took place at Center West (WA001000088).

Security: The fence at University House (WA001000088) was repaired. Fences were installed at two Scattered Sites (WA001000050). Intercoms were replaced at Island View (WA001000093) and Wildwood Glen (WA001000093).

Site: Sidewalks were repaired at Lake City House (WA001000087). A concrete slab with wire mesh and a drainage system was replaced at a Scattered Site (WA001000050).

Other capital projects: SHA completed various small capital projects at Scattered Sites buildings, including window replacement, siding repair and replacement, exterior painting, appliances, flooring, cabinet replacement, door repair and replacement and window furnishings.

B. Leasing information

i. Actual number of households served

Number of households served through:	Number of unit months occupied/leased		Number of households served	
	Planned	Actual	Planned	Actual
MTW Public Housing units leased³	63,857	59,806	5,321	4,984
MTW Housing Choice Vouchers utilized⁴	118,013	114,120	9,834	9,510
Local, non-traditional: Tenant-based⁵	0	781	0	65

³ *MTW Public Housing unit months leased/households* also includes 77 units in MTW Neighborhood Services-Occupied status which are used for housing Local, Non-Traditional (LNT) households. These units are excluded in the table below to avoid double-counting. Using a different service model, these units served 95 unique households.

⁴ *Housing Choice Voucher unit months leased/households* includes all voucher types included in HUD's Substantially the Same calculation (MTW, Mainstream, Family Unification Program (FUP) pre-2008).

⁵ Beginning in 2023, households in SHA's respite program at Jefferson Terrace are counted as LNT: Tenant-based due to a change in the financing of the units the program utilizes. Through these units, 309 unique individuals were served in 2023.

Local, non-traditional: property-based⁶	5,421	5,906	452	492
Local, non-traditional: Homeownership	0	0	0	0

Planned/actual totals	187,291	183,540	15,607	15,295
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Please describe differences between the planned and actual households served.

<p><u>Public housing households</u>: Leasing was delayed at buildings across SHA’s portfolio due to fire, clutter and infestation. As a result, unit turnover took longer than expected and SHA’s actual number of households served through public housing was reduced.</p> <p><u>Housing Choice Voucher households</u>: SHA stopped issuing vouchers in 2023 as the agency reached the end of the 2017 voucher waiting list, in anticipation of opening the voucher list in 2024. This temporarily reduced SHA’s voucher utilization, which is anticipated to return to normal in 2024 after issuance begins again.</p> <p><u>Local, non-traditional households</u>: Slightly fewer households moved than anticipated in 2023 in the LNT portfolio increasing the number of unit months occupied.</p>

Local, non-traditional category	MTW activity name/number	Number of unit months occupied/leased		Number of households to be served	
		Planned	Actual	Planned	Actual
Tenant-based	MTW Activity #8: Special purpose housing use	0	781	0	65
Property-based	MTW Activity #20: Local, non-traditional affordable housing strategies	5,421	5,906	452	492
Homeownership	N/A	0	0	0	0

Households receiving local, non-traditional services only	Average number of households per month	Total number of households in 2023
N/A	0	0

ii. Discussion of any actual issues/solutions related to leasing

Housing program	Description of actual leasing issues and solutions
MTW public housing	Building issues (such as a fire and infestation problems) caused longer unit turnover times than expected in 2023 in a few select buildings. Unaffected buildings leased up as usual.

⁶ Local, Non-Traditional: Property-based unit months leased/households includes households reported under MTW Activity #20 in the table below. It excludes households reported in MTW Activity #8, as those units are accounted for in MTW public housing above (per footnote 3).

MTW Housing Choice Voucher	The project-based program (excluding SHA’s SLIHP units) continues to have problems leasing quickly. Staffing shortages at the agencies managing the project-based buildings lead to longer unit turns and slower application processing times.
Local, non-traditional	SHA manages the waitlists and leasing procedures for subsidized LNT units the same for public housing. Unsubsidized LNT units (e.g. straight tax credit units) do not have waitlists. Leasing was normal in 2023.

C. Waiting list information

i. Actual waiting list information

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Was the waiting list opened during 2023?
MTW public housing	Site-based	6,744	Partially open	No
MTW Housing Choice Voucher (Tenant-based)	Community-wide	0	Closed	No
MTW Housing Choice Voucher (Project-based)	Site-based	4,228 ⁷	Partially open	No
Local, non-traditional	Site-based	0	Closed ⁸	No

Please describe any duplication of applicants across waiting lists.

There is duplication across waiting lists as households are permitted to be and often are on waiting lists for many housing programs (e.g., public housing and tenant-based vouchers) at the same time. For partner-operated project-based units, many partners fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system which maintains a central waitlist for Permanent Supportive Housing units and other units targeting households experiencing homelessness. Site-based waitlists also allow participants to apply to multiple sites simultaneously which often results in duplication across waitlists at different projects.

⁷ 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. Because of this, the number of households on the waitlist for these units is an estimate based on previous years’ totals. Approximately 80 programs use these referrals.

⁸ Subsidized LNT unit (project-based) waitlists for household served under MTW Activity 20 were combined with Public Housing waitlists in 2019 using our MTW authority in *Activity 15: Combined program management*. Agencies housing participants through Activity 8 manage their own admissions.

ii. Actual changes to waiting list in 2023

Waiting list name	Description of actual changes to waiting list
MTW public housing	No changes.
MTW Housing Choice Voucher (tenant-based)	SHA drew down the HCV tenant-based voucher wait list by year end 2023. Any remaining households were either issued a voucher or purged from the list. SHA opened its voucher list in early 2024.
MTW Housing Choice Voucher (project-based)	No changes.
Local, non-traditional	No changes.

D. Information on statutory objectives and requirements

i. 75% of families assisted are very low income⁹

Income level	Number of local, non-traditional households admitted in 2023
50-80% area median income	6
30-49% area median income	22
Below 30% area median income	101

Total local, non-traditional households admitted	129
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ii. Maintain comparable mix

Family size	Baseline mix of family sizes served (upon entry to MTW)				Baseline mix percentage
	Occupied public housing units	Utilized HCVs	Non-MTW adjustments	Baseline number mix	
1 person	3,317	1,535	785	5,637	51%
2 person	967	1,041	79	2,087	19%
3 person	590	824	0	1,414	13%
4 person	423	529	0	952	9%
5 person	223	259	0	482	4%
6+ person	203	207	0	410	4%
Total	5,723	4,395	864	10,982	100%

Please describe the justification for any “non-MTW adjustments” given above.

Since 1999, SHA has done significant asset repositioning and made numerous non-MTW policy changes (such as occupancy standards). In addition, the demographics and availability of other housing resources in the Seattle community has changed.

⁹ SHA does not include counts of newly admitted participants to the medical respite program at Jefferson Terrace because the nature of the program (serving individuals pending hospital discharge who would otherwise be street-homeless).

In 2011, SHA added 894 units from the Seattle Senior Housing Portfolio. Using average occupancy for the most recent three years, the baseline was adjusted to show an increase of 785 one-person households and 79 two-person households.

Since there is not necessarily a direct relationship in unit/policy changes and household size, SHA reserves the right to make further historical adjustments in future reports.

Data issues: Approximately 100 households were not included in the 1998 numbers due to missing historical data for a portion of Holly Park, which was undergoing redevelopment at the time.

Mix of family sizes served (in 2023)				
Family size	Baseline mix percentage	Number of households served in 2023	Percentage of households served in 2023	Percentage change from 1999 to 2023
1 person	51%	9,579	58%	+13%
2 person	19%	2,764	17%	-12%
3 person	13%	1,407	8%	-35%
4 person	9%	1,099	7%	-26%
5 person	4%	735	4%	+11%
6+ person	4%	973	6%	+47%
Total	100%	16,557	100%	

Please describe the justification for any variances of more than 5% between 2023 and 1999.

Since 1998, SHA has undertaken significant asset repositioning and significantly increased the number of HCVs under MTW. While there is not a one-for-one relationship between unit size and household size, the changes in household size served largely reflect the changes in public housing unit sizes in the past 20+ years. SHA’s tenant-based voucher program typically does not consider household size when selecting households from the voucher list and therefore the change in the mix is subject to changes outside of SHA’s control, such as demographic changes in the broader community. In addition, the allocation of PBVs to support service-enriched housing locally has increased the number of single-adult households, due to a community-driven focus on prioritizing currently homeless households.

iii. Number of households transitioned to self-sufficiency in 2023

MTW activity name/number	Number of households transitioned to self-sufficiency	SHA local definition of self-sufficiency
MTW activity #2: Family self-sufficiency program	353	Number of participants whose primary source of income is wages
MTW activity #8: Special purpose housing use	19	Number of households that transition to unsubsidized housing (not including medical respite)
MTW activity #10: Local rent policy	1,240	Number of households in properties with absolute minimum rent that have

MTW activity name/number	Number of households transitioned to self-sufficiency	SHA local definition of self-sufficiency
		primary source of income from wages
MTW activity #13: Homeownership and graduation from subsidy	28	Number of households who transitioned to unsubsidized housing due to homeownership and graduation from subsidy strategies.

0

Households duplicated across MTW activities

1,640

Total households transitioned to self sufficiency

(III) Proposed MTW activities

All proposed MTW activities that were granted approval by HUD are reported in Section IV as “approved activities.”

(IV) Approved MTW activities

Introduction

This section provides HUD-required information detailing previously HUD-approved uses of SHA's MTW authority. SHA has made efforts 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. To better understand how SHA is implementing MTW activities and to identify promising practices, 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 implemented (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:

<i>Implemented (active) MTW activities</i>
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
<i>Not yet implemented activities</i>
21. Self-sufficiency assessment and planning
<i>Activities on hold</i>
4. Investment policies
<i>Closed out activities</i>
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 a description of these MTW activities that have been previously approved and report on outcomes 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 in prior Plans and Reports since a strategy was first identified. Some updates may be unintentionally left out.

Emergency response and recovery

In SHA’s approved 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 the 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.

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 ¹⁰
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

Impact

Development simplification strategies are intended to promote housing choice by allowing SHA to acquire, finance, develop and remove property in a manner that maximizes our ability to take advantage of market conditions and provide affordable housing throughout Seattle.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Housing choice	HC #1: Additional units of housing	Number of new housing units made available for	0	400 cumulative	0 new in 2023; 1 cumulative	No

¹⁰ 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.

	made available	households at or below 80% AMI as a result of development simplification.				
	HC #2: Units of housing preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available.	0	500 cumulative	0 new in 2023; 1,085 cumulative	Yes
	HC #5: Increase in resident mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of development simplification.	0	0	0	Yes

Data collection methods

SHA closely tracks all details regarding housing development and acquisition projects, including the number of units developed and acquired and project expenses and revenues, including interest costs and leveraged funds for all mixed-finance and bond-financed programs.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA’s development activities and, specifically, use of this MTW activity are largely dependent on external factors such as the availability of financing, the real estate market and community

priorities. As a result, performance against the benchmarks is neither a positive nor negative reflection of the efficacy of the MTW strategies in Activity #1.

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 age 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.

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	2007 MTW Plan	MTW authority not needed	None

Strategy	Description	First identified	Current status	Year(s) updated
	better align with program goals and local resources.			
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

Impact

FSS is integrated within SHA's JobLink program which connects residents to employment, education and resources through one-on-one coaching support. The program helps residents build assets, develop job preparation and interview skills, teaches financial planning and literacy skills, supports residents to start small businesses, 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.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Self-sufficiency	SS #1: Increase in household income	Average earned income of JobLink participants	Avg. \$16.50/hour for participants employed at program entry	Avg. \$17.61/hour or higher for participants in JobLink job placements ¹¹	Avg. \$23.11/hour	Yes
	SS #2: Increase in household savings	Average savings/escrow of JobLink participants	Avg. \$484 for participants at program entry	Avg. \$2,500 savings/escrow for JobLink participants	Avg. \$2,269/participant	No
	SS #3: Increase in positive outcomes in employment status	Number of participants at time of program entry for each category:	Number of participants at program entry:	Participant outcomes:	Participant outcomes:	No (1 out of 4 met)
			Employed full-time	123	120	

¹¹ Average hourly wage is taken from the Workforce Development Council of Seattle-King County self-sufficiency standard for the Seattle/King County area. The standard was last updated in 2020.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
		Employed part-time	150	40	42	
		Enrolled in an educational program	144	200	182	
		Enrolled in a job training program	20	20	1	
		Unemployed	362	N/A	N/A	
		<i>Totals</i>	<i>799</i>	<i>380</i>	<i>301</i>	
	SS #5: Households assisted by services that increase self-sufficiency	Number of individuals receiving services aimed to increase self-sufficiency.	357 participants	535 participants	646 participants	Yes
	SS #8: Households transitioned to self-sufficiency	Number of participants transitioned to unsubsidized housing during the Plan year.	2 participants	2 participants	8 participants	Yes
	SS #8: Households transitioned to self-sufficiency	Number of participants whose primary source of income is wages.	245 participants	245 participants	353 participants	Yes

Data collection methods

JobLink tracks participants and outcomes by individual rather than by household and therefore all reported metrics represent individual participants.

Savings/escrow baseline is the average of self-reported bank account balances. Annual outcomes are the average accrued escrow balance of participants with escrow accounts. The benchmark represents 50% of JobLink’s maximum escrow disbursement.

In order to become self-sufficient, particularly in an expensive market like Seattle, additional education and training may be necessary for JobLink participants to obtain a living wage job. Therefore, employment is not always the immediate goal for all JobLink participants and “unemployed” is not a meaningful metric. Employment status data is based on job placements only.

Participants that enroll in job training programs at local community colleges are categorized under educational programs rather than job training in order to avoid duplicate counts.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmarks for the following metrics:

- *Self-sufficiency #2: Increase in household savings*
- *Self-sufficiency #3: Increase in positive outcomes in employment status*

In 2023, JobLink outcomes were slightly below benchmarks in several areas due to the nature of the labor market in Seattle. The return of many employers to in-person or hybrid work resulted in rapidly changing workplace expectations that SHA is managing with JobLink participants. Additionally, the benchmark for SS#3 reflects 380 participants, while the outcomes reflect 301 participants. The ratio of people's employment categories at their entry into the program is roughly similar to the benchmarks, SHA just did not serve the same volume of individuals in this manner in 2023. SHA will reevaluate the benchmarks moving forward if this becomes a recurring issue.

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	1999 MTW Plan	Activated in 2020	2003 2004 2009

Strategy	Description	First identified	Current status	Year(s) updated
	duplicative inspections by using other recent inspections for agencies such as the Washington State Housing Finance Commission			2012 2019 2020 2021
3.A.03 (Combined and re-categorized from 3.H.03, 3.P.01)	Reduced frequency of inspections: Cost-benefit approach to housing inspections allows Seattle Housing Authority 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 2022	2022
Public housing strategies				
3.P.01	Reclassified as 3.A.03			

Impact

MTW inspection protocol strategies are intended to increase cost effectiveness by saving staff time through less frequent inspections and by inspecting SHA's own units rather than contracting this work, with a goal of no negative impact on the quality of housing.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost-effectiveness	CE #1: Agency cost savings	Total cost of inspections in dollars	\$429,647 in wages (CY 2000)	\$761,477 or less in wages (CY 2023 adjusted)	\$680,118 in wages	Yes
	CE #2: Staff	Total amount of staff time dedicated to	18,720 total staff hours	16,640 or fewer staff hours	10,448 hours (5.0 FTE)	Yes

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
	time savings	inspections prior to implementation	(9.0 FTE)	(8.0 FTE)		
	SHA metric #1	Total amount of staff hours saved by avoided inspections	0 hours	500 hours annually	2,340 hours	Yes
Maintain housing quality	SHA metric #2	Voucher participant-requested inspections per leased vouchers	1.8% (128 requests per 6,997 HHs)	<1.8% annually	0.6% (65 requests per 9,510 HHs)	Yes
	SHA metric #3	Percent of voucher units that fail inspections (excluding SLIHP)	29% failure rate	33% or less	29.5% failure rate (1,067 annual fails out of 3,612 annual inspections)	Yes

Data collection methods

Hours, costs and time savings for MTW inspection protocol strategies are reported for both HCV and public housing portfolios. HOPE VI communities and Yesler are excluded because their staffing structure for inspections and property management are distinct from the rest of the public housing portfolios and because SHA has different inspection goals for these portfolios. MTW strategies such as less frequent inspections are not applied in HOPE VI communities and Yesler and they are therefore not included in the data for the metrics.

Total hours and costs are reported based on inspections staff wages only. Other costs such as mileage, benefits and overhead are not included. Hours are calculated based on actual number of inspections staff at year end.

Hours saved from avoiding annual inspections for public housing units is based on the total number of units that did not receive a full inspection during the year multiplied by 30 minutes, the average length of each inspection.

The voucher management system records the results of all inspections by type and all inspection requests.

Updates

SHA updated *Strategy 3.A.03: Reduced frequency of inspections* in the 2023 MTW Plan. This added the new National Standards for the Physical Inspection of Real Estate (NSPIRE) to the set of standards that may interchangeably be used in SHA’s inspection protocols.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

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.

Approved strategies in this activity are as below.

Strategy	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 HOPE VI communities must participate in self-sufficiency activities.	1999 MTW Plan	Activated in 1999 Inactivated in 2021	2005 2005-R 2021-R
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

Strategy	Description	First identified	Status	Year(s) updated
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

Impact

Local lease strategies are intended to enable SHA the flexibility to meet local priorities including promoting self-sufficiency by encouraging work-able adults to participate in self-sufficiency activities, housing choice by providing living environments that are pet-free in addition to communities that allow pets and through the ability to offer lease incentives to ensure units are leased.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost of lost rental revenue due to vacancy	\$399,010 (CY 2016)	\$536,155 (CY 2023 adjusted)	\$751,989	No
	CE #2: Staff time savings	Total time to lease vacant units	26,527 vacancy days (151,583 staff hours) (CY 2016)	26,527 vacancy days (151,583 staff hours)	59,002 vacancy days (472,016 staff hours)	No

Data collection methods

SHA maintains detailed records of vacancy and leasing for all public housing units. Total unit vacancy days and vacancy loss excludes units at SHA’s Yesler community, where vacancies are impacted by redevelopment, and units vacant at year end, where length of vacancy cannot yet be calculated. Vacancy days are converted into staff hours by removing weekend days and

assuming a 40-hour work week. Vacancy loss is calculated based on vacancy days and average rental revenue by portfolio.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rates for calendar year 2023 were calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmarks for the following metrics:

- *Cost-effectiveness #1: Agency cost savings* and *Cost-effectiveness #2: Staff time savings* Though the cost of vacancy days to the agency due to lost revenue was below the benchmark, the number of vacancy days was higher than the benchmark. As mentioned in Section II(B): Leasing information, staffing shortages in property management and maintenance contributed to longer than normal vacate times. Leasing was also delayed at certain buildings due to fire and infestation.

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 activity 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 currently quite meet SHA's minimum qualifications	2000 MTW Plan	Not yet implemented	None
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

Impact

Special purpose housing use strategies are intended to increase housing choice and self-sufficiency by providing service-enriched housing for households that would otherwise be difficult to serve in traditional housing authority units and by enabling services to be available in the community.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #4: Increase in resources leveraged	Amount of funds leveraged in dollars	\$0	\$2M in service dollars	\$593,448 in 2023; \$4.9M cumulative	Yes
Housing choice	HC #5: Increase in resident mobility	Number of households moving to a service-enriched unit	0 households	126 households	95 households	No
	HC #7: Households assisted by services that increase housing choice	Number of households receiving services aimed to increase housing choice	0 households	126 households	107 households	No
Self-sufficiency	SS #8: Households transitioned to self-sufficiency	Number of households that transition to unsubsidized housing	0 households	50 households	19 households	No
	SHA metric #1	Number of onsite agencies in SHA's residential units	5 agencies	5 agencies	5 agencies	Yes
	SHA metric #2	Percent of households that exit service-enriched units for stable housing (transitional, permanent or unsubsidized)	0% of exits	70% of exits	44% of exits (68 out of 154 total exits)	No

Data collection methods

Unit use is tracked by staff in SHA's property management software. All other metrics, including households served, new entries, exits and exit reasons are tracked by the partner agencies themselves and reported at year-end.

Medical respite program participants at Jefferson Terrace are not included for household metrics because the medical respite program model and goals are unique.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmarks for the following metrics:

- *HC #5: Increase in resident mobility*
- *HC #7: Households assisted by services that increase housing choice*

This metric captures households served in SHA's agency units, which includes the respite program at Jefferson Terrace. Due to the rehab at the building, the respite program is operating at approximately 50% capacity. Additionally, one of the agency unit providers shifted their service delivery model from short-term emergency shelter to longer-term transitional housing, resulting in longer household stays in units and lower turnover.

- *SS #8: Households transitioned to self-sufficiency*
- *SHA metric #2*

Fifty-three percent of household exits were coded as "unknown" for the agency unit program. This results in the data showing fewer reported moves to unsubsidized or "stable" housing.

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.

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 (Superseded by 3.A.01 & 03)	2020 2021
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 Inactivated in 2010 (Superseded by 10.H.12)	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-based contract - allows shared housing and transitional housing.	2000 MTW Plan	Activated in 2002	None
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

Strategy	Description	First identified	Status	Year(s) updated
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
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

Strategy	Description	First identified	Status	Year(s) updated
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

Impact

The project-based program is intended to promote cost effectiveness by reducing staff time and leveraging funding, as well as expanding housing choice by increasing access to service-enriched affordable housing.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost to administer project-based vouchers (in wages)	\$0	\$633,205 or less (CY 2023 adjusted)	\$847,860	No
	CE #2: Staff time savings	Total time to administer project-based vouchers (in staff hours)	0	16,640 or fewer (8.0 FTE)	24,960 hours (12 FTE)	No
	CE #4: Increase in resources leveraged	Amount of funds leveraged (in dollars)	\$0	\$200,000 or more	\$11.5 million in 2023	Yes
	SHA metric #1	SHA hours saved by allowing partners to maintain their own waiting lists and not conducting new/turnover inspections	0	1,400 hours or more	1,002 hours	No
	SHA metric #2	SHA hours spent on project-based vs. tenant-based vouchers (in FTEs)	0.0034 FTE per leased TBV (20 total FTE for 5,962 TBVs)	Staff time per PBV is equal to or less than time per TBV	0.0028 FTE (11.5 FTE total for 4,145 PBVs)	Yes
Housing choice	HC #4: Displacement prevention	Number of households at or below 80% AMI	0 households	50 households or fewer	305 households	No

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
		that lose assistance or need to move				
	HC #5: Increase in resident mobility	Number of households moving to a service-enriched unit	0 households	500 households	365 households	No

Data collection methods

SHA maintains detailed tenant, inspection, landlord and voucher allocation information in its voucher management system. Partner agencies maintain waiting list information and commit to service levels in their application for PBVs. Staff hours are calculated based on actual number of PBV-dedicated staff. Time savings are based on an estimated one hour of time saved processing a new tenant application for each new household served off a partner’s waiting list and 30 minutes per turnover inspection avoided. Comparative time savings between project-based and tenant-based vouchers is calculated based on leased vouchers only and excludes special purpose vouchers and port-outs. Total costs represent staff salary costs only and exclude all overhead, benefits and other costs.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmark for the following metrics:

- *Cost effectiveness #1: Agency cost savings and Cost Effectiveness #2: Staff time savings:* SHA has struggled with meeting the benchmarks for these two metrics since the agency first reported on them in 2015. This is due to the ever-growing portfolio of vouchers the agency has project-based since 2013.
- *SHA metric #1: SHA hours saved and Housing choice #5: Increase in resident mobility:* SHA has consistently met the benchmark for these two metrics since beginning to report on them in 2015. Since 2020, numbers have declined in mobility as evidenced by the

fact that the benchmarks for these metrics have not been met since. Staff at partner agencies attribute this to staffing shortages, which leads to slower application processing times and unit turnover times. As a result, fewer hours were “saved” through time saving strategies and there were fewer new move-ins. SHA will continue to monitor these results to see if this becomes a permanent trend or if unit turnover begins to increase again.

- *HC #4: Displacement prevention:* SHA’s jurisdiction was under a number of overlapping eviction moratoria from 2020-2022 as a result of the pandemic. By 2023, these moratoria had ended and evictions resumed. The volume of evictions in 2023 is presumed to be higher than pre-COVID levels as a result of a backlog of evictions which had been pending while moratoria were in place.

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 activity addresses 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.

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
10.A.03	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.	2023 MTW Plan	Not yet implemented	None
10.A.04 (Recategorized from 10.H.13 in 2023)	Streamlined medical deduction: SHA will allow self-certification of medical expenses.	2010 MTW Plan	Activated in 2011	2015 2023-R

Strategy	Description	First identified	Current status	Year(s) updated
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 2019 2020
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

Strategy	Description	First identified	Current status	Year(s) updated
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	Recategorized as 10.A.04.			
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 sewer/water under their lease, with a proration for energy-efficient units.	2011 MTW Plan	Activated in 2011	None
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

Strategy	Description	First identified	Current status	Year(s) updated
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 encourage self-sufficiency and resource conservation.	2005 MTW Plan	Not yet implemented	None
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	2011 MTW Plan	Activated in 2011	2018 2021

Strategy	Description	First identified	Current status	Year(s) updated
	adjustments and income reviews only every three years.			
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
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

Impact

Local rent policy strategies are intended to promote cost effectiveness by saving staff time and to support self-sufficiency by encouraging households to build income, employment and assets.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost of recertifications (in wages)	\$720,966 in wages (CY 2009)	\$1,154,260 or less (CY 2023 adjusted)	\$752,901 in wages	Yes
	CE #2: Staff time savings	Total time to complete recertifications (in staff hours)	45,407 staff hours	45,224 or fewer staff hours	22,800 staff hours	Yes
	SHA metric #1	Total time in savings from local rent policies	2,873 staff hours saved	3,056 or more staff hours saved	3,525 staff hours	Yes
Housing choice	HC #4: Displacement prevention	Number of households at 80% AMI or below who would lose assistance or need to move without local rent policies	69 public housing evictions	69 or fewer evictions	26 court filings for eviction	Yes
Self-sufficiency	SS #3: Increase in positive outcomes in employment status	Number of heads of household who are:	Number of heads of household who are:	Number of heads of household who are:	Number of heads of household who are:	Yes
		Employed full-time	455 / 34%	455 / 34%	655 / 35%	
		Employed part-time	552 / 34%	552 / 34%	593 / 32%	
		Unemployed	662 / 33%	662 / 33%	617 / 33%	
	SS #8: Households transitioned to self-sufficiency	Number of households in properties with absolute minimum rent whose primary source of income is from wages	1,080 households	1,200 households	1,240 households	Yes

Data collection methods

SHA began implementing rent reforms in 2001. However, meaningful data from that time period for staffing and hours spent on recertifications is unavailable. We therefore use 2009 as the baseline year for recertification metrics because data is available and because this year precedes implementation of a round of rent policy strategies that had a measurable impact on staff hours, including implementation of triennial recertifications in the HCV program. SHA conducted a 2013 time study to determine the amount of staff time spent on public housing

annual and interim recertifications and a 2011 time study for the HCV program. Reported costs in this category reflect only staff wages attributable to conducting certifications and do not include benefits, taxes, or costs for resources such as postage and paper. Total wages are calculated by multiplying median wage rates for the staff positions times the amount of time per certification times the number of certifications. This methodology is used rather than total wages because many staff are engaged in a number of activities not related to certifications. Baseline data for 1999 for households whose primary source of income is through wages does not include Holly Park because this data is not available.

SHA does not track employment by full-time or part-time status. Instead, we provide these figures using a proxy that makes assumptions based on earned income using the minimum wage rate (\$15 per hour for 2023¹²).

SHA maintains records on tenant certifications including income, rents, exclusions, etc. in the respective systems of record for public housing and HCV.

Recertification data exclude Mod Rehab units and port-in voucher households.

Updates

SHA received no hardship request related to absolute minimum rent in 2023.

Actual non-significant changes

Strategy 10.H.13 has been recategorized as Strategy 10.A.04 to reflect that this strategy is being used in both HCV and Public Housing.

Actual changes to metrics/data collection

Benchmarking for CE #1 and SS #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

None.

¹² In 2023 in Seattle, the minimum wage for large employers was \$18.69 per hour and for small employers ranged between \$16.50 and \$18.69 per hour (dependent on factors such as benefits and tips). In Washington State, the minimum wage for all employers was \$15.74 per hour. Due to the range of minimum wage rates in the City of Seattle and the fact that not all residents are employed in businesses which operate within the city boundaries, SHA uses \$15 per hour as a proxy calculation rate for full time and part time status. See [Seattle's Office of Labor Standards](#) and [Washington's Department of Labor & Industries](#) for additional information.

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

Impact

Resource conservation strategies are intended to increase cost effectiveness by working continuously with local utility providers and the City of Seattle to identify conservation measures in a timely manner and avoiding the cost of hiring a third party to conduct energy audits every five years.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost of energy audits per year	\$102,000 (CY 2009)	\$239,560 (CY 2023 adjusted)	\$34,738 in staff salaries in 2023	Yes
Agency metrics	SHA metric #1	Savings from water conservation measures	N/A	\$900,000 per year (since CY 2009)	\$881,792 in 2023; \$29.2 million since implementation	Yes
	SHA metric #2	Savings from electricity conservation measures	N/A	\$147,000 per year (since CY 2009)	\$332,690 in 2023; \$5.8 million since implementation	Yes

Data collection methods

SHA maintains detailed utility consumption and rate data supplied by utility providers and SHA's own system. Cost savings measures look solely at the impact of conservation initiatives and are not an agency-wide measure of utility usage. For example, portfolios that were not included in the conservation initiatives are not included in the analysis. Cost savings represent the total amount of energy saved through conservation initiatives and do not distinguish between resulting decreases in expenses for the agency and for tenants.

The baseline cost of energy audits is based on the real cost to SHA of \$51,000 for an energy audit of 520 units in 2009, resulting in a proportionate estimated cost of \$510,000 for 5,200 public housing units. Since energy audits are required only once every five years, this is divided by five to calculate an average annual cost of \$102,000 for the baseline. The cost of energy audits is based on a percentage of the median salary for staff responsible for energy and utility analyses. This analysis does not include factors such as overhead or benefits.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

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.

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 circumstances, for example if they enter into a repayment agreement.	2008 MTW Plan	Activated in 2008 Inactivated in 2010-R	2008-R
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

Strategy	Description	First identified	Status	Year(s) updated
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	None

Impact

Waiting list, preferences and admission strategies are intended to increase cost effectiveness by reducing avoidable turnover and avoiding costs for tasks that can be fulfilled by service providers.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost of administering waiting lists and admissions, in wages	\$442,791 (CY 1999)	\$731,957 (CY 2023 adjusted)	\$674,814 in staff salaries	Yes
	CE #2: Staff time savings	Total time to administer waiting lists and admissions, in staff hours	24,960 (12.0 FTEs)	20,800 or fewer (10.0 FTEs)	18,720 staff hours (9.0 FTEs)	Yes
Agency metrics	SHA metric #1	Savings from agencies	\$0	\$24,960	\$18,525	No

		maintaining their own waiting lists (per year)				
	SHA metric #2	Number of applicants newly receiving housing through agency referrals or waiting lists	0	75	95 new admissions	Yes

Data collection methods

Avoided costs from agencies maintaining their own waiting lists is calculated based on savings of \$195 per newly occupied unit for partnership and service-provider operated housing units. The \$195 per unit is derived from the agency’s real cost in 2010 of \$879,050 to conduct regular admissions for 4,500 units.

Hours are calculated based on actual number of admissions staff. Staff costs are calculated based on the median wage per position, but do not include other costs such as benefits and overhead.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmarks for the following metrics:

SHA metric #1: Savings from agencies maintaining their own waiting lists: While SHA did meet the benchmark for the number of new households admitted through strategies in Activity 12, the organization did not meet the cost savings metric. This is perhaps due to a change in the cost of administering these units since the benchmark was set in 2010. SHA may reevaluate this benchmark in the future.

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 away from housing subsidy – not only through homeownership, but also through unsubsidized rentals in the private market. These strategies include End of Participation clocks for households whose income has increased to the point where they no longer require substantial subsidy.

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 Inactivated in 2013 Activated in 2022	2004-R 2007 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 Inactivated in 2018 Activated in 2022	2018 2022
Voucher strategies				
13.H.01	Mortgage assistance: Seattle Housing Authority may develop a homeownership program that includes mortgage subsidy.	2008 MTW Plan	Not yet implemented	None
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

Strategy	Description	First identified	Status	Year(s) updated
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

Impact

Homeownership and graduation from subsidy strategies promote self-sufficiency and create housing opportunities for waiting list households by helping participants leave subsidized housing.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total remediation costs in buildings where the incentive is offered	\$416,688 total remediation costs in Bell Tower, Jefferson Terrace, Olive Ridge and Westwood Heights (2017)	\$455,911 in remediation costs (CY 2023 adjusted)	\$212,004 in remediation costs	Yes
	SHA metric #1	Total vacancy time in buildings where the incentive is offered	2,529 total vacancy days for Bell Tower, Jefferson Terrace, Olive Ridge and Westwood Heights (2017)	2,373 total vacancy days	9,952 total vacancy days	No
Housing choice	HC #6: Increase in homeownership opportunities	Number of households that purchased a home through homeownership and graduation from subsidy strategies	0 households	5 or more households	2 households	No
Self-sufficiency	SS #8: Households transitioned to self-sufficiency	Number of households who transitioned to unsubsidized housing due to homeownership and graduation from subsidy strategies	0 households	25 or more households	28 households	Yes

Data collection methods

End of participation information is maintained in SHA's participant databases. Homeownership is not tracked for households leaving the HCV program due to the end of participation clock. SHA maintains records of all households vacating their units, including the date of exit, the per-unit costs of unit remediation services (i.e. the work orders related to repairing a unit to prepare it for new tenants) and the number of days the unit is vacant between tenants.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not meet the benchmarks for the following metric:

- *SHA metric #1: Total vacancy time* As mentioned several times in this Report, SHA is undertaking a significant rehabilitation project at Jefferson Terrace and half the units were taken offline in 2023 to allow for the renovation. The inability to achieve the benchmark was based on this factor.
- *Housing choice #6: Increase in homeownership opportunities* The market for housing in Seattle is extremely expensive, even with a slight downturn in the market in 2023. As a result, homeownership is out of reach for many people in Seattle, particularly those with low incomes, and even for those who graduate from subsidy.

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

Impact

Combined program management strategies are intended to increase cost effectiveness by decreasing staff time through the elimination of duplicated activities, such as inspections and waiting lists, and the streamlining of rent and other policies that would otherwise be similar, but different, if the units were operated under the separate subsidy programs.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost to complete recertifications for combined program management units (in wages)	\$10,335 (CY 2007)	\$200,969 or less	\$228,788	No
	CE #2: Staff time savings	Total time to complete recertifications for combined program management units	472 hours (CY 2007)	6,608 hours or fewer	6,953 hours	No

Data collection methods

Staff time is calculated based on a 2011 voucher time study and 2013 public housing time study, which found that on average it took 16 minutes to key an annual review in HCV's data

system of record, plus an average of 146 total minutes to complete a regular recertification in public housing. The time required for a regular recertification in public housing is used as a proxy for the equivalent amount of time required to complete an annual tax credit certification in the HOPE VI units. The baseline figure is derived from the average total time required to complete a public housing annual review plus the average total time required to complete a project-based voucher annual review.

The data provided on time saved through this strategy reflects only time spent on annual recertifications and does not reflect the added opportunities for efficiencies through unified waiting lists and inspections. Data on cost savings reflects median wage levels only and excludes other factors such as overhead, benefits, and postage.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for *Cost effectiveness #1: Agency cost savings* was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

The baseline and benchmark metrics for Activity 15 were based off of unit counts from 2007, when the SLIHP program was much smaller. Through various disposition and development activities, SHA's portfolio of SLIHP units is nearly 18 times what it was in 2007¹³. SHA rebenchmarking in 2020 and 2022 based on this growth. Due to additional SLIHP units being added in 2023, the agency did not meet the benchmark despite having rebenchmarking in 2022. Because SHA will be reevaluating all reported metrics in 2024 due to the updated Form 50900 removing the required Standard Metrics, SHA is not rebenchmarking in 2023.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

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.

¹³ In 2007, SHA had 143 SLIHP units. By 2023, this has grown to 2,538 SLIPH units.

Description

SHA works 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 rental and related assistance 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)			

Impact

Short-term assistance strategies contribute to self-sufficiency by providing households with the services and financial assistance that they need to remain stable in their housing and/or to obtain housing.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Housing choice	HC #4: Displacement prevention	Number of households at or below 80% AMI that would lose assistance or need to move without access to emergency assistance funds	0	0	0	Yes
	HC #5: Increase in resident mobility	Number of households able to move to a better unit (per year)	0	3 or more households	0	No
	HC #7: Households assisted by services that increase housing choice	Number of households receiving services aimed at increasing housing choice (per year)	0	25 or more households	0	No

Data collection methods

Outcomes for households are tracked through program records and HMIS.

SHA reports zeroes for the benchmark and annual outcome for emergency assistance for housing stability (Metric HC #4 / Strategy 18.A.02) because the policy allows the agency to disregard this type of emergency assistance and it is not collected from residents/participants.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA did not achieve the benchmarks for *Housing choice #5: Increase in resident mobility* and *Housing choice #7: Households assisted by services that increase housing choice* in Activity #18 because SHA did not fund short-term rental assistance in 2023 and because MTW was not necessary for excluding short-term/one-time payments. SHA may adjust the benchmark in the future.

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
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 moving with their voucher to a different community.	2015 MTW Plan	Activated in 2015	None
19.H.04	Streamlined local timelines and processes for improved leasing success: SHA may modify leasing	2019 MTW Plan	Activated in 2019	None

	timelines and processes to support leasing success and improve efficiency			
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Impact

Mobility and portability strategies support cost effectiveness by reducing agency costs and time commitments.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Cost effectiveness	CE #1: Agency cost savings	Total cost to complete port-out processing (in wages)	\$17,332 (CY 2014)	\$19,691 in wages (CY 2023 adjusted)	\$2,556 in wages	Yes
	CE #2: Staff time savings	Total time to complete port-out processing (in staff hours)	419 hours	369 hours	54.5 hours	Yes
Housing choice	HC #4: Displacement prevention	Number of households at or below 80% AMI that would lose assistance	9 expired MWCA vouchers (While absent from unit)	Fewer than 10 expired MWCA vouchers (While absent from unit)	32 expired MWCA vouchers (While absent from unit)	No

Data collection methods

SHA maintains records of households that have ported-out of Seattle in Elite (the current system of record for the HCV program). Time estimates represent initial port out processing only and do not include subsequent activities such as annual port-out updates. Cost estimates represent staff wages and do not include overhead costs.

SHA also maintains records in Elite of issuance and leasing success for Moving with Continued Assistance (MWCA) vouchers.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

Benchmarking for CE #1 was updated to reflect inflation. The new rate for calendar year 2023 was calculated using the Bureau of Labor Statistics inflation calculator.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

SHA missed the benchmark for *Housing choice #4: Displacement prevention*. After a reduction in the number of Moving with Continued Assistance (MWCA) vouchers issued in 2020-2021 due to pandemic-related causes, SHA resumed a normal volume of MWCA issuance in 2022. Many of these vouchers didn't expire until 2023, reflecting an increase in expiration that SHA attributes to a backlog.

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

Impact

Local non-traditional affordable housing strategies support housing choice by creating and preserving affordable housing options for households below 80% AMI throughout the city of Seattle.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Housing choice	HC #1: Additional units of housing made available	Number of new units made available for households at or below 80% AMI (cumulative)	0	596 units	81 new units in 2023; 805 units cumulative	Yes
	HC #2: Units of housing preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (cumulative)	0	90 units	0 new units in 2023 513 units cumulative	Yes

Data collection methods

SHA routinely tracks information on all of its housing stock, including funding type.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

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 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

Impact

Housing Assistance for School Stability strategies support self-sufficiency and housing choice by providing homeless families with housing and supports that allow them to keep their children in the same school.

This activity is **on schedule**.

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
Housing choice	HC #5: Increase in resident mobility	Number of households able to move to a unit that allows them to continue their child's	0	22 households	67 households (10 new households in 2023)	Yes

Statutory objective	Metric	Unit of measurement	Baseline	Benchmark	Outcome	Benchmark achieved?
		enrollment at their current neighborhood or feeder school (cumulative)				
	HC #7: Households assisted by services that increase housing choice	Number of households receiving services to increase housing choice (cumulative)	0	25 households	60 households (10 new households in 2023)	Yes
Self-sufficiency	SS #5: Households assisted by services that increase self-sufficiency	Number of households receiving services to increase self-sufficiency (cumulative)	0	25 households	60 households (10 new households in 2023)	Yes

Data collection methods

SHA, Seattle Public Schools and service partners maintain detailed records of participation in the program, including receipt of housing assistance and supportive services.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

Challenges in achieving benchmarks and possible strategies

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.

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 2023 investment flexibility was not needed and all SHA investments followed HUD policies.

Approved strategies in this activity are as below.

Strategy	Description	First identified	First implemented	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 2023. 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. Financial reporting

i. Available MTW funds in 2023

SHA began reporting to HUD on the new 50900 in 2013. Public housing authorities continue to submit their financial information through the Financial Assessment System - PHA (FASPHA) rather than in the MTW Report. The following sections provide information on a few aspects of SHA's use of MTW funding flexibility, but they are not comprehensive. SHA has submitted unaudited and audited information in the prescribed Financial Data Schedule (FDS) format through the Financial Assessment System – PHA (FASPHA).

ii. Expenditures of MTW funds in 2023

The MTW Block Grant is a critical element of MTW participation, allowing MTW housing authorities to combine Public Housing capital, operating and most Housing Choice Voucher subsidies into a single source of funding that they can allocate to meet local housing and service needs of low-income people in Seattle. The following table describes how SHA used single fund flexibility in 2023. SHA submitted unaudited and audited information in the prescribed FDS format through the FASPHA.

iii. Describe application of MTW funding flexibility

Application of MTW funding flexibility
<p>Seattle Housing Authority's use of MTW funding flexibility is important in supporting the agency's array of low-income housing programs and services, its local partnerships, and to meet locally defined needs. SHA uses this single fund flexibility as required by the First Amendment to the MTW Agreement. Funding flexibility allowed under MTW supports a variety of low-income housing services and programs and is central to the agency's Local Asset Management Plan (LAMP). SHA's LAMP includes the whole of its operations, including sources and uses of revenue. During 2023, SHA exercised its MTW flexibility to allocate MTW revenues among the Authority's housing and administrative programs. This enabled SHA to further its mission and strategic plan by balancing the mix of housing types, services, capital investment and administrative support to different low-income housing programs and different groups of low-income residents and voucher participants.</p> <p>In 2023, Seattle Housing used single fund authority of \$76.5 million to support the following activities:</p> <ul style="list-style-type: none">• Support resident and voucher households to achieve greater economic stability through building assets, achieving education goals and gaining job opportunities.• Provide community supportive services and health and wellness programs for public housing participants such as case management, education and youth activities to support housing stability and education achievement.

- Low-income housing acquisition, development, preservation and rehabilitation to increase SHA’s capacity to serve more low-income people through owned and/or managed residential facilities.
- Implement facility protocols and Information technology changes to enhance security of electronic systems and workplaces; and support staff with appropriate equipment for working in a hybrid environment supporting both in-office and remote work activities.
- Direct support of local low-income housing operations, assistance, capital repairs and program support to ensure safe, decent and affordable housing.

While all the above activities benefit from the flexibility of SHA’s MTW funds, nearly all activities are for Section 8 and Section 9 participants and a minor share also benefit local, non-traditional MTW activities as defined in PIH Notice 2011-45. SHA remains in compliance with the guidance regarding use of funds described in PIH Notice 2011-45.

B. Local asset management plan

- | | | |
|------|---|-----|
| i. | Did SHA allocate costs within statute in 2023? | Yes |
| ii. | Did SHA implement a local asset management plan (LAMP) in 2023? | Yes |
| iii. | Did SHA provide a LAMP in the appendix? | Yes |
- iv. If SHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that SHA did not make any changes in 2023.

Seattle Housing continues to operate under its approved Local Asset Management Plan (LAMP), as first stipulated in the 2010 Annual Plan and in practice since the beginning of its MTW participation. No significant changes were made to Seattle Housing's LAMP during 2023.

SHA updates its Indirect Service Fees (ISF) annually, adds new programs if/when created and SHA maintains on-site maintenance staffing at selected communities as deemed most efficient to meet local needs. SHA submitted the LAMP with our 2023 MTW Plan and it was approved by HUD in a letter received February 22, 2023.

In compliance with the First Amendment to the MTW Agreement and the Office of Management and Budget (OMB) Super Circular at Title 2 CFR Part 200 (formerly A-87 requirements), SHA has set up an Indirect Services Fee. The indirect cost plan is described in more detail in SHA’s LAMP. Similar to HUD's Central Office Cost Center (COCC) and consistent with Circular 200, SHA created a Central Services Operating Center (CSOC) to represent the fee charges and expenses for indirect costs. As described previously, SHA developed an ISF in compliance with OMB Circular 200 requirements. SHA's CSOC is more comprehensive than HUD's asset management system, which focuses only on fees for services for public housing properties. SHA's mission and work is much broader than public housing and therefore SHA's LAMP is broader. The LAMP includes local housing, for sale activities, limited partnership properties and other activities not found in traditional HUD programs or public housing agencies.

SHA’s ISF is based on anticipated indirect costs serving all direct service programs. In accordance with OMB Circular 200 requirements, the ISF is determined in a reasonable and consistent manner based on total units and leased vouchers. The ISF is a standard fee

calculated annually per housing unit and leased voucher charged each month to each program. Please see the LAMP in the appendices to review SHA's Indirect Cost Plan.

(VI) Administrative

A. Review, audits and inspections

SHA received no findings from HUD audits and monitoring visits that required actions to correct in 2023.

B. Evaluation results

SHA is not currently engaged in any agency-wide evaluations of its MTW program.

C. MTW statutory requirement certification

SHA certifies that the agency has met the three MTW statutory requirements in 2023.

1. At least 75% of families assisted by SHA are very low income.
 - SHA certifies that it is meeting this statutory objective. HUD, as stated in Section II, will confirm this with PIC data and the information SHA provides in this Report on households served by LNT programs.
2. SHA continues to assist substantially the same total number of households as would have been assisted had SHA not participated in the MTW Demonstration.
 - SHA continued to meet this requirement in 2023. Supporting details in HUD's prescribed format may be submitted separately from this Report.
3. SHA has maintained a comparable mix of households (by family size) served as would have been served had SHA not participated in the MTW Demonstration.
 - SHA has maintained a comparable mix of families by family size in 2023 as would have been served absent the Demonstration. While the distribution of family sizes served has shifted since SHA began its MTW participation, these shifts are largely attributed to non-MTW changes such as housing stock and community demographics, as explained in Section II of this Report.

D. MTW energy performance contract (EPC) flexibility data

Not applicable.

Appendix A: Housing stock and leasing overview

In the body of this Report, we provide statistics on properties and units funded through the MTW Block Grant. However, SHA owns and manages additional housing stock funded through other sources. In this appendix we provide an overview of SHA's housing stock for units that are both MTW and non-MTW funded.

Year-end snapshot: Seattle Housing Authority housing stock

Public housing stock (MTW-funded)

The Low-Income Public Housing program (also referred to as Public Housing or LIPH) included 5,243 units as of year-end 2023. Public housing units are in high-rises (large apartment buildings), Scattered Sites units (small apartment buildings and single-family homes scattered throughout the city) and in communities at High Point, Lake City Court, NewHolly, Rainier Vista and Yesler. HUD's MTW Block Grant provides funding to help pay for operating costs exceeding rental income. Households typically pay approximately 30% of their monthly income for rent and utilities. About 100 of these Public Housing units are utilized by service providers who provide transitional housing or services to residents. More than 900 public housing units are part of the Seattle Senior Housing Program. Forty units receiving Public Housing subsidy through SHA are owned by nonprofits and operated as traditional Public Housing.

Voucher stock (MTW-funded)

The Housing Choice Voucher (HCV) program is also known Section 8. The program is a public/private partnership that provides vouchers (housing subsidies) to low-income families for use in the private rental housing market. At year-end 2023, SHA administered 10,610 vouchers funded through HUD's MTW Block Grant.

Participants typically pay 30 to 40% of their household's monthly income for rent and utilities, depending on the unit that they choose. Voucher subsidies are provided through a variety of means including:

- Tenant-based (tenants can take their vouchers into the private rental market).
- Project-based (the subsidy stays with the unit, property or defined set of properties).
- Program-based (MTW flexibility allows SHA to provide unit-based subsidies that float within a group of units or properties).
- Provider-based (SHA uses MTW flexibility to distribute subsidies through service providers so that they can master lease units and sublet to participants in need of highly supportive housing).
- Agency-based (tenant-based vouchers distributed through selected partners).

Housing stock (non-MTW federally funded)

SHA also administers units and vouchers that are federally funded through sources other than the MTW Block Grant.

Moderate Rehab

SHA administers HUD Section 8 Moderate Rehab funding for 238 units operated by partner nonprofits serving extremely low-income individuals.

Section 8 New Construction

SHA has administered Section 8 New Construction properties in the past, but did not have any of these properties in its portfolio in 2023.

Special purpose vouchers

SHA administers vouchers for special purposes (2,2465 as of year-end 2023), such as housing previously homeless veterans and reuniting families. These vouchers, referred to collectively as SPVs, are often awarded competitively and funding is provided outside of the MTW Block Grant.

Other affordable housing

Other affordable housing programs are operated outside of HUD's MTW Block Grant. They receive no operating subsidy except for some project-based vouchers in selected properties. SHA may use MTW Block Grant funds for capital improvements in other affordable housing properties serving low-income residents (as authorized by *Strategy 20.A.01: Use of funds for local, non-traditional affordable housing*). SHA's other affordable housing is not equivalent to HUD's local, non-traditional category, but there is some overlap between the two categories.

Senior housing

The Seattle Senior Housing Program (SSHP) was established by a 1981 Seattle bond issue. It includes 22 apartment buildings throughout the city, totaling over 960 units affordable to low-income elderly and disabled residents. In 2011, the agency added Public Housing subsidy to 894 of these units to keep rents affordable while addressing needed capital repairs. The agency used MTW authority to maintain the SSHP program's unique rules and procedures despite the introduction of Public Housing subsidy.

Remaining in the Seattle Senior Housing Program (as of year-end 2023) are 136 units without Public Housing subsidy.

Tax credit and other housing types

SHA operates 2,082 units of other types of housing, including locally subsidized housing and unsubsidized housing. Units are located in townhomes and small apartment complexes throughout Seattle, including low- and moderate-income rental housing in the agency's redeveloped family communities (High Point, NewHolly, Rainier Vista and Yesler). These units do not receive ongoing operating subsidy, with the exception of project-based vouchers in selected units.

Changes in housing inventory

MTW Block Grant-funded housing	YE 2022	YE 2023
Housing Choice Vouchers	10,403	10,610
<i>Tenant-based vouchers</i>	5,962	5,881
<i>Project-based vouchers (partner-owned)</i>	3,024	3,235
<i>Project-based vouchers (SHA-owned)</i>	1,365	1,462
<i>Program-based vouchers (SHA-owned)</i>	10	10
<i>Provider-based vouchers</i>	42	22
Public housing	5,243	5,243
<i>SHA-owned*</i>	5,203	5,203
<i>Partner-owned</i>	40	40
Total MTW Block Grant-funded housing units	15,646	15,853

Other HUD-funded housing	YE 2022	YE 2023
Housing Choice Vouchers (Special Purpose Vouchers)**	2,265	2,465
<i>Emergency Housing Vouchers (EHV)</i>	498	518
<i>Family Unification Program (FUP)</i>	275	275
<i>Foster Youth Initiative (FYI)</i>	75	163
<i>Housing conversion (tenant protection)</i>	147	127
<i>Mainstream disability vouchers</i>	305	317
<i>Non-Elderly Disabled vouchers (NED)</i>	451	442
<i>RAD</i>	396	396
<i>Veterans Affairs Supportive Housing (VASH)</i>	569	669
Section 8 New Construction	0	0
Section 8 Moderate Rehab	238	238
Total other HUD-funded housing units	2,428	3,145

Other affordable housing	YE 2022	YE 2023
Seattle Senior Housing Program (SSHP)*	136	136
Tax credit housing (without subsidy)	1,541	1,054
Other affordable housing	910	892
Managed by SHA for other owners	0	0
Total other affordable housing units	2,587	2,082

	YE 2022	YE 2023
Total housing units***	20,661	21,080

* Includes units for live-in staff, residential units used for services and units leased to partner agencies to provide housing.

** Some SPVs are project-based as follows (with the subset in SHA units in parentheses): FUP 0 (0), housing conversion 0 (0), Mainstream 89 (0), RAD 323 (0), VASH 169 (0).

*** Due to the project-basing and program-basing of Housing Choice Vouchers in other affordable housing units, the total housing unit calculation is the sum of all housing units minus SHA-owned project-based vouchers, program-based vouchers and project-based SPVs utilized in SHA owned/managed units. Units managed for SHA for other owners (if any) are also not included in the total housing calculation.

Appendix B: New project-based voucher units

SHA awarded 2 new contracts totaling 131 new project-based vouchers in 2023. The projects are detailed below.

13 th & Fir							
Project description	13 th & Fir is a part of the Yesler Terrace Redevelopment Plan and was developed by an outside partnership. It has a total of 156 units from studio to 4-bedroom size, of which 80 will receive PBV subsidy. It has an onsite early learning and childcare center in addition to commercial space, interior and exterior common areas, and secure bike and laundry rooms.						
Number of project-based units at property	0 BR	1 BR	2 BR	3 BR	4 BR	5+ BR	TOTAL
	0	25	38	13	4	0	80

Salish Landing							
Project description	Salish Landing (formerly Lam Bow Apartments) was completely redeveloped following a fire. The redeveloped project consists of 82 total units – 51 PBVs, 30 tax credit units and 1 common area unit. Salish Landing is owned by SHA and the PBV units will be administered under the Streamlined Low-Income Housing Program (Activity 15: Combined program management). Over 80% of the PBV units are family-sized.						
Number of project-based units at property	0 BR	1 BR	2 BR	3 BR	4 BR	5+ BR	TOTAL
	0	9	30	12	0	0	51

Appendix C: Actual existing project-based vouchers

The below table consists of the tenant-based vouchers that were project-based in 2023. This section meets the requirements prescribed in HUD Form 50900 Section II.A.ii: Actual existing project-based MTW vouchers.

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Al ?al	29	29	Leased /Issued	No	Permanent supportive housing
104 th St. Townhomes	3	3	Leased /Issued	No	Affordable housing
A Place of Our Own	19	19	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	12	Leased /Issued	No	Enhanced behavioral health services
Alderbrook Place (formerly CPC Alderbrook)	6	3	Leased /Issued	No	Enhanced behavioral health services
Aldercrest	8	8	Leased /Issued	No	Affordable housing
Almquist Apartments	52	52	Leased /Issued	No	Permanent supportive housing
Arbora Court	40	40	Leased /Issued	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	6	Leased /Issued	No	Affordable housing
Aurora House	30	30	Leased /Issued	No	Permanent supportive housing
Avalon Place	9	9	Leased /Issued	No	Permanent supportive housing
Baldwin Apartments	15	15	Leased /Issued	No	Affordable housing
Bayview Tower	21	37	Leased /Issued	No	Affordable housing
Beacon House	6	6	Leased /Issued	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	5	Leased /Issued	No	Affordable housing
Bergan Place	2	2	Leased /Issued	No	Homeless young adults
Bergan Place	8	8	Leased /Issued	No	Affordable housing
Brettler Family Place I and II	51	51	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Brettler Family Place III	21	21	Leased /Issued	No	Service-enriched for homeless families and individuals
Broadway Crossing	10	10	Leased /Issued	No	Affordable housing
Broadway Crossing	9	9	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Bush Hotel	7	7	Leased /Issued	No	Affordable housing
Casa Pacifica	6	6	Leased /Issued	No	Affordable housing
Casa Pacifica	5	5	Leased /Issued	No	Affordable housing
Cascade Court Apartments	3	3	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Cascade Court Apartments	5	5	Leased /Issued	No	Affordable housing
Cate Apartments	10	10	Leased /Issued	No	Affordable housing
Cate Apartments	15	15	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Cedar Crossing	7	7	Leased /Issued	No	Affordable housing
Centerwood Apartments	2	2	Leased /Issued	No	Affordable housing
Cluster SMH (Community Psychiatric Clinic)	14	14	Leased /Issued	No	Enhanced behavioral health services
Colonial Gardens	20	20	Leased /Issued	No	Affordable housing
Columbia Court	13	13	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	16	16	Leased /Issued	No	Affordable housing
Compass Broadview	18	18	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	33	Leased /Issued	No	Permanent supportive housing
Compass on Dexter	36	36	Leased /Issued	No	Service-enriched for homeless individuals

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Council House	30	30	Leased /Issued	No	Senior housing
CPC 10th Ave. NW	5	0	Leased /Issued	No	Enhanced behavioral health services
Crestwood Place Apartments	6	6	Leased /Issued	No	Affordable housing
Croft Place	7	7	Leased /Issued	No	Affordable housing
David Colwell Building	25	25	Leased /Issued	No	Affordable housing
Dekko Place	5	5	Leased /Issued	No	Affordable housing
Delridge Heights Apartments	3	3	Leased /Issued	No	Affordable housing
Delridge Triplexes	6	6	Leased /Issued	No	Affordable housing
Denny Park Apartments	5	5	Leased /Issued	No	Affordable housing
Denny Park Apartments	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
DESC	12	12	Leased /Issued	No	Enhanced behavioral health services
Eastern Hotel	4	4	Leased /Issued	No	Affordable housing
Eastlake Supportive Housing	25	25	Leased /Issued	No	Permanent supportive housing
Emerald City Commons	12	12	Leased /Issued	No	Affordable housing
Ernestine Anderson Place	33	33	Leased /Issued	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	15	Leased /Issued	No	Permanent supportive housing
Evans House	49	49	Leased /Issued	No	Permanent supportive housing
Fir Street Apartments	7	7	Leased /Issued	No	Affordable housing
First Place	4	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	25	Leased /Issued	No	Senior housing
Four Freedoms House	126	126	Leased /Issued	No	Senior housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Fremont Solstice Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
The Genessee	17	17	Leased /Issued	No	Affordable housing
The Genessee	3	3	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Golden Sunset	21	44	Leased /Issued	No	Affordable housing
Gossett Place	12	12	Leased /Issued	No	Permanent supportive housing
Gossett Place	28	28	Leased /Issued	No	Permanent supportive housing
High Point	100	100	Leased /Issued	No	Affordable housing
Hilltop House	30	30	Leased /Issued	No	Senior housing
Hoa Mai Gardens	70	70	Leased /Issued	No	Affordable housing
Hobson Place	63	63	Leased /Issued	No	Permanent supportive housing
Holden Manor	1	1	Leased /Issued	No	Affordable housing
Holden Street Family Housing (Santa Teresita del Niño Jesus)	25	25	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	6	Leased /Issued	No	Affordable housing
Humphrey House	71	71	Leased /Issued	No	Permanent supportive housing
Imani Village	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Josephinum Apartments	25	25	Leased /Issued	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	49	Leased /Issued	No	Service-enriched for homeless individuals
Judkins Park	4	4	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Judkins Park	4	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
The Julie Apartments	2	2	Leased /Issued	No	Affordable housing
The Julie Apartments	20	20	Leased /Issued	No	Affordable housing
The Julie Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
The Karlstrom	17	17	Leased /Issued	No	Service-enriched for homeless individuals
Kebero Court	83	83	Leased /Issued	No	Affordable housing
Kenyon Housing	18	18	Leased /Issued	No	Permanent supportive housing
Kerner-Scott House	15	15	Leased /Issued	No	Permanent supportive housing
Kingway Apartments	16	16	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Kristin Benson Place	77	77	Leased /Issued	No	Permanent supportive housing
Lake City Commons	15	15	Leased /Issued	No	Affordable housing
Lake Washington Apartments	37	37	Leased /Issued	No	Affordable housing
Lakeview Apartments	5	5	Leased /Issued	No	Affordable housing
Lakeview Apartments	6	6	Leased /Issued	No	Affordable housing
Lakeview Apartments	15	15	Leased /Issued	No	Affordable housing
Legacy House	22	22	Leased /Issued	No	Senior housing
Leschi House	35	35	Leased /Issued	No	Senior housing
Lewiston Apartments	28	28	Leased /Issued	No	Permanent supportive housing
Lincoln Apartments	4	4	Leased /Issued	No	Affordable housing
Lyon Building	12	12	Leased /Issued	No	Permanent supportive housing
Main Street Apartments	2	2	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Main Street Place	8	8	Leased /Issued	No	Affordable housing
Marion West	25	25	Leased /Issued	No	Affordable housing
Martin Court	28	28	Leased /Issued	No	Service-enriched for homeless individuals
Martin Court	13	13	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Family Housing (Katharine's Place)	10	10	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Family Housing (Katharine's Place)	5	5	Leased /Issued	No	Affordable housing
Martin Luther King Properties	6	6	Leased /Issued	No	Affordable housing
Martin Luther King Junior Apartments	10	10	Leased /Issued	No	Affordable housing
Martina Apartments (formerly CHS Greenwood)	66	66	Leased /Issued	No	Permanent supportive housing
Mary Avenue Townhomes	8	8	Leased /Issued	No	Affordable housing
McDermott Place (Lake City Court)	10	10	Leased /Issued	No	Permanent supportive housing
McDermott Place	15	15	Leased /Issued	No	Permanent supportive housing
Meadowbrook View Apartments	15	15	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Mercer Court	3	3	Leased /Issued	No	Affordable housing
Monica's Village Place	38	38	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	13	Leased /Issued	No	Affordable housing
Morrison Hotel	190	190	Leased /Issued	No	Permanent supportive housing
Muslim Housing	10	10	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	5	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Nihonmachi Terrace	20	20	Leased /Issued	No	Affordable housing
Nihonmachi Terrace	5	5	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	15	Leased /Issued	No	Affordable housing
NP Hotel	5	5	Leased /Issued	No	Affordable housing
Oleta Apartments	6	6	Leased /Issued	No	Affordable housing
One Community Commons	5	5	Leased /Issued	No	Affordable housing
One Community Commons	7	7	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Opportunity Place	145	145	Leased /Issued	No	Permanent supportive housing
Ozanam House (formerly Westlake II)	29	29	Leased /Issued	No	Permanent supportive housing
Pacific Hotel	6	6	Leased /Issued	No	Permanent supportive housing
Palo Studios at the Josephinum	7	7	Leased /Issued	No	Service-enriched for homeless individuals
Pantages Apartments	10	10	Leased /Issued	No	Affordable housing
Pantages Apartments	11	11	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	3	Leased /Issued	No	Affordable housing
Park Place	100	100	Leased /Issued	No	Assisted living
Park Place	36	36	Leased /Issued	No	Assisted living
Parker Apartments	8	8	Leased /Issued	No	Affordable housing
Parkview Services	23	23	Leased /Issued	No	Affordable housing for people with disabilities
Pat Williams Apartments	20	21	Leased /Issued	No	Permanent supportive housing
Patricia K	12	12	Leased /Issued	No	Permanent supportive housing
Patrick Place	40	40	Leased /Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Pioneer Human Services	11	0	Leased /Issued	No	Enhanced behavioral health services
Plymouth on First Hill	77	77	Leased /Issued	No	Permanent supportive housing
Plymouth on Stewart	74	74	Leased /Issued	No	Permanent supportive housing
Plymouth Place	70	70	Leased /Issued	No	Permanent supportive housing
Rainier Vista NE	23	23	Leased /Issued	No	Affordable housing
Raven Terrace	50	50	Leased /Issued	No	Affordable housing
Ravenna Springs Properties	13	13	Leased /Issued	No	Affordable housing
Red Cedar	80	80	Leased /Issued	No	Affordable housing
Rise at Yancy	44	44	Leased /Issued	No	Permanent supportive housing
Rose of Lima House	30	30	Leased /Issued	No	Permanent supportive housing
Rose Street Apartments	4	4	Leased /Issued	No	Affordable housing
Samaki Commons	12	12	Leased /Issued	No	Affordable housing
Samaki Commons	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Campus	18	18	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	21	Leased /Issued	No	Permanent supportive housing for families
Scattered Sites – Bitterlake Portfolio	54	54	Leased /Issued	No	Affordable housing
Scattered Sites – Madison Portfolio	17	17	Leased /Issued	No	Affordable housing
Scattered Sites – Northeast Seattle Portfolio	38	38	Leased /Issued	No	Affordable housing
Scattered Sites – Northwest Seattle Portfolio	47	47	Leased /Issued	No	Affordable housing
Scattered Sites – South Park Portfolio	16	16	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Scattered Sites – South Seattle Portfolio	10	10	Leased /Issued	No	Affordable housing
Scattered Sites – University District Portfolio	5	5	Leased /Issued	No	Affordable housing
Scattered Sites – West Seattle Portfolio	41	41	Leased /Issued	No	Affordable housing
Sea-Mar Family Housing	5	5	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
SHA-SFD Special Portfolio	1	1	Leased /Issued	No	Affordable housing
Simons Senior Housing Apartments	77	78	Leased /Issued	No	Permanent supportive housing
Sound Mental Health	6	0	Leased /Issued	No	Enhanced behavioral health services
Sound Mental Health	20	0	Leased /Issued	No	Enhanced behavioral health services
South Shore Court (formerly Douglas Apartments)	9	9	Leased /Issued	No	Affordable housing
Spruce Street Apartments	10	10	Leased /Issued	No	Affordable housing
St. Charles Apartments	29	0	Leased /Issued	No	Permanent supportive housing
Starliter Apartments	6	6	Leased /Issued	No	Affordable housing
Stone Avenue Townhomes	4	4	Leased /Issued	No	Affordable housing
Stone Way Apartments	21	21	Leased /Issued	No	Affordable housing
Stone Way Apartments	14	14	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sylvia Odom’s Place	64	64	Leased /Issued	No	Permanent supportive housing graduates
Tamarack Place	20	20	Leased /Issued	No	Affordable housing
Traugott Terrace	40	40	Leased /Issued	No	Service-enriched for homeless individuals in recovery
Tyree Scott Apartments	10	10	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2023	RAD?	Description of project
	Planned	Actual			
Tyree Scott Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase I	17	17	Leased /Issued	No	Affordable housing
Views on Madison Phase I	10	10	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase II	7	7	Leased /Issued	No	Affordable housing
Villa Park	5	6	Leased /Issued	No	Affordable housing
Village Square II Apartments	31	31	Leased /Issued	No	Affordable housing
Vivian McLean Place Apartments	4	4	Leased /Issued	No	Affordable housing
Weller Apartments	47	49	Leased /Issued	No	Affordable housing
Westwood Heights East	22	22	Leased /Issued	No	Affordable housing
West Seattle Affordable Housing (formerly Longfellow)	7	7	Leased /Issued	No	Affordable housing
West Seattle Affordable Housing (formerly Roxhill)	6	6	Leased /Issued	No	Affordable housing
West Seattle Affordable Housing (formerly Wisteria)	6	6	Leased /Issued	No	Affordable housing
Yesler Court	5	5	Leased /Issued	No	Affordable housing
YWCA Women's Residence	15	15	Leased /Issued	No	Permanent supportive housing
YWCA Women's Residence	38	38	Leased /Issued	No	Permanent supportive housing for women
Actual total existing PBVs	4,284	4,253			
Total projects/contracts	192	187			

Appendix D: Local asset management plan

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.

Framework for SHA’s Local Asset Management Program

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 38,000 low-income people, representing nearly 19,000 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 incomes.

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 in Central Seattle. In the past 24 years, SHA has undertaken redevelopment or rehabilitation of all four family communities, a new family community in Lake City and SHA’s Public Housing high-rise buildings, using mixed financing with low-income housing tax credit limited partnerships and/or American Recovery and Restoration Act (ARRA) funds. As of year-end 2023, SHA was the general partner in 17 limited partnerships.

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 plan (LAMP), 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:

1. **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.
2. **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.
3. **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.

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 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 and services program city- and county-wide. As such, not only is SHA's LAMP designed to create a cohesive whole of SHA housing programs, 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, housing program managers and 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 management of both SHA and other housing authorities and providers.

A key element of SHA's LAMP is the Asset Management Team (AMT), comprised of senior leadership staff from Housing Operations, Asset Management, Property Services, Development, Executive, Legal, Finance, Budgets, Community Services, Communications, Policy and the Housing Choice Voucher department. The interdisciplinary AMT meets bi-weekly throughout the year and addresses:

- All critical policy and program issues facing individual properties or 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., 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 annual MTW 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 AMT 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.

Note: The in-person cross-department Asset Management Team formal Quarterly Portfolio Reviews have been suspended since early in the pandemic. The agency continued other groups, providing venues for addressing priority issues, including the Financial Policy Oversight group, the Cross-Departmental Policy Work Group and Cabinet (a weekly meeting of agency-wide department directors). SHA is exploring resuming the Asset Management Team in 2024.

4. To ensure that SHA 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 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 their 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 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 eligible expenses under the grant.
- SHA uses local funds from operating surpluses to augment community services funding from grants; these surpluses have 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 and weighted 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 flexibility to use MTW Block Grant resources to support its low-income housing programs is central to our 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.

LAMP implementation

Comprehensive operations

Consistent with the guiding principles above, a fundamental driver of SHA's LAMP is its application comprehensively 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.

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 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.

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.

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:

- Contract costs readily identifiable with delivering housing assistance to low-income families
- Housing Assistance Payments, including utility allowances, for vouchers
- Utilities
- Surface Water Management fee
- Insurance
- Bank charges
- Property-based audits
- Staff training
- Interest expense
- Information technology fees
- Portability administrative fees
- Rental Assistance department costs for administering Housing Choice Vouchers including inspection activities
- Operating costs directly attributable to operating SHA-owned properties
- Fleet management fees and fuel costs
- Central maintenance services for unit or property repairs or maintenance
- Central maintenance services including, but not limited to, landscaping, pest control, decorating and unit turnover
- Operating subsidies paid to mixed income, mixed finance communities
- Community Services Department costs directly attributable to tenant services
- Gap financing real estate transactions
- Acquisition costs
- Demolition, relocation and leasing incentive fees in repositioning SHA-owned real estate
- Homeownership activities for low-income families
- Leasing incentive fees
- Certain legal expenses
- Professional services at or on behalf of properties or a portfolio, including security services
- Extraordinary site work
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families
- Any cost identified for which a grant award is made (such costs will be determined as SHA receives grants)
- Direct finance staff costs
- Direct area administration staff costs

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:

- Executive
- Communications
- Most of Legal
- Development (most Development staff charge directly to the Development Fund; only certain staff and functions in this department are indirect charges)
- Finance
- Purchasing
- Human Resources
- 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)
- Administration staff and related expenses of the Housing Operations Department that cannot be identified to a specific cost objective

Indirect service fee: Base, derivation and allocation

SHA has established an Indirect Services Fee (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 and 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 cost remained unchanged at the per unit per month (PUM) cost for housing units at \$68.44 and for leased vouchers \$24.60.

Annual review of ISF 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. SHA has extensively allocated MTW status to most communities; allocation of variances using MTW sources is allowed.

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 Report 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 other affordable 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 12.31.2028). 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
- GASB 87 lease accounting
- 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: 2021 Indirect Services Fee plan

Attachment 3: Matrix: HUD vs. SHA indirect and direct costs

Appendix D: Attachment 1
SHA cost objectives, FDS reporting structure and SHA funds

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				
Funds	Capital WIP unallocated costs	400	Various, including LIPH portion of LP CUs	104	190	17 LPs LIPH portion reported in AMPs	700 704-709	139	125				
	IT capital projects			122						194	711-712	168	CS grants
	100			127						195	718-719		
	480			137						198	723-749		
				193/216						199	848		
				352-354						450			
				357						470			
				591									
				750									
				754									

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 D - Attachment 2: 2023 Indirect Cost Allocation Plan

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

*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
Total fixed revenues	\$ 6,642,353

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
Total units	17,902

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
Total Low Income Public Housing		4,239	3,481,406
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
Total Other Housing Programs		13,663	4,882,641
Total Management Fee		17,902	8,364,047

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
Total HOPE VI Limited Partnerships		543	413,934
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
Total Restricted Units		1,572	1,190,434
Total		2,115	1,604,368

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

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

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

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
SHA Local Asset Management Program (LAMP)

Low-income public housing	
Direct expense per HUD	
1.	Actual personnel costs of staff assigned directly to AMP sites
2.	
3.	
4.	Repair & maintenance costs, including:
	<ul style="list-style-type: none"> • Centralized maintenance provided under fee for service
	<ul style="list-style-type: none"> • Maintenance supplies
	<ul style="list-style-type: none"> • Contract repairs e.g. heating, painting, roof, elevators on site
	<ul style="list-style-type: none"> • Make ready expenses, including painting and repairs, cleaning, floor replacements, and appliance replacements;
	<ul style="list-style-type: none"> • Preventive maintenance expenses, including repairs and maintenance, as well as common area systems repairs and maintenance
	<ul style="list-style-type: none"> • Maintenance contracts for elevators, boilers, etc.
5.	Utility costs
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
8.	PILOT
9.	All costs of insurance for the AMP
10.	Professional services contracts for audits, rehab and inspections specific to the project.
11.	

Direct expense per SHA LAMP	
1.	Actual personnel costs of staff assigned directly to AMP sites
2.	Area management site costs allocated to AMPs within area
3.	Direct procurement staff
4.	Repair & maintenance costs, including:
	<ul style="list-style-type: none"> • Centralized maintenance provided under fee for service (IPS)
	<ul style="list-style-type: none"> • Maintenance supplies
	<ul style="list-style-type: none"> • Contract repairs e.g. heating, painting, roof, elevators on site
	<ul style="list-style-type: none"> • Make ready expenses, including painting and repairs, cleaning, floor replacements, and appliance replacements;
	<ul style="list-style-type: none"> • Preventive maintenance expenses, including repairs and maintenance, as well as common area systems repairs and maintenance
	<ul style="list-style-type: none"> • Maintenance contracts for elevators, boilers, etc.
5.	Utility costs
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
8.	PILOT
9.	All costs of insurance for the AMP
10.	Professional services contracts for audits, rehab and inspections specific to the project.
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.	
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