



Seattle Housing Authority **Moving to Work** *Proposed 2024* **Annual Plan**



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**Seattle Housing Authority is accepting comments on the draft Moving to Work
Annual Plan through September 30, 2023**

How to provide public comment:

Phone: 206.239.1528

Email: mtw@seattlehousing.org

Postal mail: Policy Office, P.O. Box 19028, Seattle, WA 98109-1028

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Report prepared by

Lily Sweeney, Policy Strategic Advisor

With contributions and support from: Brooke Anderson, Jared Cummer, Gashaw Dessie, David Edwards, Caroline Engle, Truc Ho, Ali Kamenz, Mark LaBreyere, Ian Langer, Andria Lazaga, Susanna Linse, Jo Lopez, Jeanne McGrady, Terry Mowatt, Miki Naganuma, Samara Ressler, Nisha Riley, Marie Wiley, Sarah Zavaleta

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I. Introduction

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

SHA provides affordable housing to more than 38,000 people¹ through a variety of opportunities including SHA owned/managed units, subsidizing collaborative units operated by non-profit partners and tenant-based vouchers that provide subsidy to participants to rent in the private market. Thirty percent of SHA's participants in Seattle are children and about the same number of participants are seniors or adults with disabilities. About 82 percent of SHA households have annual incomes below 30 percent area median income (AMI) and their median household income is \$13,728 annually.

In keeping with SHA's mission, the agency also supports 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) Block Grant, special purpose funds from the US Department of Housing and Urban Development (HUD), other government grants, tenant rents and revenues from other activities. This Plan focuses on activities supported by the MTW Block Grant.

The information in this Annual Plan is submitted to HUD every year following public engagement and Board approval. It 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 MTW goals and objectives for 2024 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. Through the lens of these three goals and using the flexibility authorized under MTW, SHA continuously reviews our MTW practices and policies to best maximize our resources and provide affordable housing to low-income people in Seattle.

Long-term MTW goals and objectives

MTW is a critical tool in SHA's ability to advance its mission. Therefore, one of the agency's long-term goals is to retain the flexibility and stability of the MTW program to maximize the impact of limited federal funding for people with low incomes in need of affordable housing and sustain the improvements and community investments made throughout SHA's MTW participation. Additional long-term objectives are outlined in SHA's [Strategic Plan](#)

SHA has a strong, enduring commitment to race and social justice. To further strengthen this position, SHA works to take an active stance against racism by weaving in race and social justice throughout the agency's operations. This includes utilizing Moving to Work and strategic

¹ Data was pulled on 8.1.2023.

planning processes as critical ways to further the agency's equity work and guide SHA towards becoming a more anti-racist organization.

Over the course of 2023, SHA staff have been working collaboratively to create a new Strategic Plan. SHA's Strategic Plan serves as a valuable touchstone for decision-making and shaping policies, programs and budgets, underpinning SHA's mission and values. The events of the early 2020s have highlighted just how important it is for entities like SHA to be in dialogue and responsive to the communities the agency is designed to serve, and that values like equity and a commitment to anti-racism are integral to the success of any organization. The development of a new Strategic Plan gives SHA the opportunity to realign its focus and priorities. It is anticipated that this new Strategic Plan will be adopted in early 2024.

The strategic planning process which SHA is engaging in is structured around an anti-racist framework. This process centers on shared leadership and inclusive decision-making, facilitated by a Steering Committee made up of staff in various roles and departments. Input from residents, voucher participants and community members is integrally woven into the process. Additionally, SHA's leadership team and Board of Commissioners have been engaged in race and social justice sessions to develop a deeper foundation in RSJ practices and methods, which will guide their decision-making structures moving forward.

This inclusive, anti-racist process purposefully allows time to incorporate the voices of all stakeholders and to fully consider the components of a new Strategic Plan and the values, meaning and impact they will have on SHA's work as a provider of affordable housing for people with low incomes in Seattle. An anti-racist process is action-oriented and is also about time for taking steps to identify racism and implement equity at the individual, institutional and structural levels, and for recognizing the various ways racism affects different identities. SHA is excited to take this bold new approach to strategic planning to make both the process and the outcome impactful on the quality of our service to SHA's participants, the community and the culture of SHA as a workplace.

Short-term MTW goals and objectives

SHA has a variety of short-term MTW goals and objectives. Below are highlights of a few that are closely tied to Moving to Work, including an update to an existing MTW strategy and two new MTW strategies.

Consistency in rent and income determinations

The processes for determining income and rent in subsidized housing programs are notoriously complex and burdensome for both participants (Housing Choice Voucher and Public Housing²) and staff (of SHA and community partners operating SHA-subsidized housing). Over the years SHA has utilized its MTW authority to adopt a comprehensive set of policies and to make several refinements to streamline processes. In 2019 SHA began the groundwork to make further improvements that will free up participants and staff to focus on other priorities. That body of work was halted by the onset of the COVID-19 pandemic. However, some of the streamlined approaches piloted during that time have since been woven into SHA's standard practices. There remains, however, both need and opportunity to look deeper.

² SHA's Seattle Senior Housing Program portfolio follows a rent policy designed specifically for that portfolio. Changes to that policy will not be a focus of this body of work.

SHA recognizes that changing these policies and processes can be stressful, confusing and time-consuming. Changing any one aspect can have a ripple effect on others. Therefore, SHA intends to maintain consistency with its current set of rent and income determination processes. In 2024 SHA will explore options and potentially develop a comprehensive set of recommendations for improvements. The process for developing recommendations will center the experiences of participants and staff directly involved, including developing a deeper understanding of other demands on their time, information and bandwidth and how those interact with SHA's rent and income determination processes.

SHA also aims for consistency in policies across our subsidized housing programs wherever it makes sense. In keeping with this goal, SHA is combining two existing strategies previously established to achieve the same purpose (*10.H.12: Asset income threshold* and *10.P.19: Asset income threshold*) into a single strategy, *Strategy 10.A.03: Asset income threshold*.

Increase housing choice and stability

In keeping with SHA's mission to foster stability and self-sufficiency for people with low incomes in the Seattle community and commitment to race and social justice, SHA will pilot a local, non-traditional reintegration housing program in 2024. As an affordable housing provider, SHA recognizes that experiencing incarceration exacerbates challenges in securing and maintaining housing and increases the likelihood of experiencing homelessness, which leaves individuals increasingly vulnerable to repeat interactions with the criminal justice system. This program would help prevent homelessness and allow for timely release for members of this vulnerable population by providing bridge housing and tailored supportive services while they seek long-term housing and economic stability after incarceration. In the initial pilot, SHA intends to focus on supporting low-income households who have at least one member reintegrating to their community from incarceration in a state or federal prison and are impacted by systemic inequities that drive gaps in being stably housed. The final program model will be further informed by the communities impacted and may evolve accordingly. (New MTW strategy - *20.A.02: Reintegration housing program* in *Activity 20: Use of funds for Local, Non-Traditional affordable housing*)

SHA also recognizes that the cost of living, particularly the cost of housing, in Seattle is much higher than most areas in the country. HUD has recently rolled out a new policy that limits a household's assets to \$100,000 for admission to Public Housing or HCV, as well as to remain in either program. This new policy stems from the federal Housing Opportunities through Modernization Act (HOTMA) adopted by Congress in 2016. Due to the extremely high cost of living and housing in Seattle, an asset limitation of \$100,000 is not appropriate or realistic for participants of SHA's housing programs. SHA is proposing a local asset eligibility threshold for admissions and continued occupancy which is appropriate for households residing in Seattle³. SHA will use this MTW strategy to set a local asset limit that makes sense for people with low incomes in Seattle, as well as to establish local hardship policies which may take into consideration such factors as age, disability, income, the ability of the family to find suitable alternative housing and whether supportive services are being provided. (New MTW strategy - *12.A.03: Local asset limits for eligibility* in *Activity 12: Waiting lists, preferences and admissions*)

³ This activity does not impact the way income from assets is used in determining household income (*Strategy 10.A.03: Asset income threshold*).

II. General operating information

A. Housing stock information

i. Planned new public housing units

Asset Management Project (AMP) name and number	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	Total units	Population type	Section 504 units (mobility)	Section 504 units (hearing / vision)
SSHP South WA001000093	25	2	0	0	0	0	27	Elderly/ Disabled	0	0
Ravenna School Apartments (AMP TBD)	34	5	0	0	0	0	39	Elderly/ Disabled	0	0

Total public housing units to be added in 2024: 66

In 2024, SHA may apply to bring South Park Manor (WA001000093)⁴, a 27-unit elderly and disabled-designated building, and Ravenna School Apartments, a 39-unit elderly and disabled-designated building into SHA's public housing portfolio using the units available under the agency's Faircloth limit. Both buildings are already part of the agency's Seattle Senior Housing Program (SSHP). In 2011, SHA brought all SSHP properties except South Park and Ravenna School into the Low-Income Public Housing Program. If SHA does so, SHA would also amend its Designation Plan to include South Park Manor and Ravenna School Apartments with the elderly and disabled designation levels consistent with SSHP.

ii. Planned public housing units to be removed

In the next year, SHA may apply for dispositions (as defined in 24 C.F.R. 970) that aid, assist or further SHA's mission but that do not result in the removal of any public housing units from SHA's public housing inventory, including, without limitation, the granting of easements, leases, licenses and covenants. The properties under consideration are listed in SHA's approved 2023 Annual Plan in Section II(A)(ii) on pp. 7-9.

iii. Planned new project-based vouchers

Property name	Number of vouchers to be project based	RAD?	Description of project
Sawara Apartments	50	No	Sawara Apartments is part of the Yesler Development plan. 114 units of affordable housing are expected to come on-line in 2024, including 50 units that will have PBV

⁴ SHA may choose to bring South Park Manor into the public housing portfolio in 2023 after the submission of this Annual Plan, under prior approval in the 2023 Annual Plan.

Property name	Number of vouchers to be project based	RAD?	Description of project
			subsidy. Approximately half the units are family-size units. Sawara will provide tenants with space for residential amenities, enclosed common area, common exterior play area and Property Management offices will be on-site.

Total planned new project-based vouchers:	50
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iv. Planned existing project-based vouchers

SHA's total **planned existing project-based vouchers at the start of 2024 is 4,762**. The complete list includes more than 190 projects; details can be found in Appendix A.

v. Planned other changes to MTW housing stock anticipated during 2024

Planned other changes to MTW housing stock anticipated in 2024
<p>The Jefferson Terrace mixed-finance rehabilitation will be completed in two phases. Work on 165 units is projected to be completed in 2023 and residents will be moved back into their units by year end 2023; the remaining 118 units will be completed in 2024 with residents returned later in the year. All units will be Low Income Housing Tax Credit (LIHTC) with PBVs.</p> <p>Sawara, a building in the Choice Neighborhoods Initiative Yesler Terrace Development, will complete construction in late 2023/early 2024. In addition to the 50 Project-Based Voucher units listed in the prior section, there will be 64 straight tax-credit units (including one Common Area Unit). Leasing is anticipated in mid-2024.</p> <p>Construction on Juniper Apartments, the final Choice Neighborhoods Initiative development in Yesler, will begin in 2024. Leasing is anticipated to begin in mid-2025, with a planned unit mix of 39 Project-Based Voucher units and 75 straight tax-credit units (including one Common Area Unit).</p> <p>In 2024, SHA may also:</p> <ul style="list-style-type: none"> • Apply for land disposition for sale to market-rate developers, for sale to Limited Partnerships to finance replacement housing and to the City of Seattle Parks Department. These sites may be part of previously approved HOPE VI and CNI developments. • Consider and convert selected properties to RAD, pending further analysis and discussion (as discussed in Section A.ii. above). • Continue holding select Scattered Sites units offline to undergo substantial rehabilitation. • Consider and use the Faircloth-to-RAD process developed by HUD to subsidize up to 1,200 units currently available under the agency's Faircloth limit. • Pursue further acquisition of additional Local, Non-Traditional housing as opportunities arise. • Develop a new building under SHA's Local, Non-Traditional authority on the site of Jackson Park Village that will commence in 2024 and add an estimated 41 PBV units (previously noted), 53 straight tax-credit units and one Common Area Unit.

Planned other changes to MTW housing stock anticipated in 2024

- Apply for dispositions (as defined in 24 C.F.R. 970) that aid, assist or further SHA's mission but that do not result in the removal of any public housing units from SHA's public housing inventory, including, without limitation, the granting of easements, leases, licenses and covenants.

vi. General description of all planned capital expenditures during 2023

General description of all planned capital expenditures during 2023

In 2024, SHA will continue its concerted effort to catch up on all maintenance work and building repairs that were deferred or not reported from 2020-2022 due to the COVID pandemic. SHA will engage in the following capital expenditures:

Accessibility: SHA will install ADA door closers on unit doors at Bitter Lake Manor (WA001000095) and handrails at 11208 Meridian Ave N (WA001000050).

Building Exterior: SHA will perform exterior upgrades at Primeau Place (WA001000094). Exterior siding repairs, replacement and painting are planned at multiple Scattered Sites addresses (WA001000050). SHA will also repair the gutters at various Scattered Sites (WA001000050).

Common Area upgrades: SHA will install louvers in the stairwell at Center Park (WA001000087). At Green Lake Plaza (WA001000086), SHA will make common bathroom upgrades and install shades in the community room. SHA plans to replace the community room ceiling at Lake City House (WA001000087).

Electrical: SHA will install a generator at Lictonwood (WA001000086) and GFCIs at International Terrace (WA001000086). SHA also plans an energy retrofit to a Scattered Site (WA001000050). SHA will install solar panels at Denny Terrace (WA001000017). Agency-wide, SHA plans to replace generators throughout SSHP and LIPH properties and will conduct an electrification study and solar panel study. SHA will also be upgrading lighting at many SSHP developments and Scattered Sites properties (WA001000050).

Flooring: SHA will be replacing flooring at Ballard House (WA001000086), Westwood Heights (WA001000023), Cedarvale House (WA001000087), Jackson Park House (WA001000088), Ross Manor (WA001000088), West Town View (WA001000088), Fort Lawton Place (WA001000094), Phinney Terrace (WA001000092), Nelson Manor (WA001000095), Willis House (WA001000095), Wildwood Glen (WA001000093), Island View (WA001000093), Blakeley Manor (WA001000095), several Scattered Sites properties (WA001000050) and vacated units throughout additional SSHP and LIPH buildings.

Haz Mat: SHA has an allowance to work on hazardous materials throughout SSHP and LIPH properties.

HVAC: SHA will upgrade the HVAC system at Nelson Manor (WA001000095) and install air handlers at Primeau Place (WA001000094) and Gideon-Mathews Gardens (WA001000094).

Interior upgrades: SHA will upgrade the interior of four units at Cedarvale Village (WA001000038). SHA also plans to upgrade units at Fir Street Townhomes (N/A) and LIPH units throughout SHA's portfolio as residents vacate.

General description of all planned capital expenditures during 2023

Life safety: SHA will be replacing smoke detectors at various LIPH and SSHP properties.

Painting: SHA will paint the interiors of Westwood Heights (WA001000023), Center West (WA001000088), Cedarvale House (WA001000087), Columbia Place (WA001000093), Phinney Terrace (WA001000092), Carroll Terrace (WA001000094), Willis House (WA001000095), several Scattered Sites (WA001000050) and units throughout vacated LIPH units. SHA will paint the exteriors of 11727 Greenwood Ave N, 10516 Midvale Ave N and 10557 Stone Ave N (WA001000050).

Plumbing: SHA will be repairing and replacing drains at University House (WA001000088) and Center West (WA001000088). SHA is also budgeted for toilet replacements in three MTW-eligible buildings in our portfolio (TBD).

Roofing: SHA will replace roofs at Primeau Place (WA001000094), Barton Place (WA001000088), Cal-Mor Circle (WA001000087), Stewart Manor (WA001000088), Wildwood Glen (WA001000093) and various Scattered Sites (WA001000050).

Security: SHA will install a second entry door at International Terrace (WA001000086). SHA will put in new DVR systems at Harvard Court (WA001000086) and International Terrace (WA001000086) as well as a security camera in the parking lot at Barton Place (WA001000088). SHA will be continuing its ACAM upgrade and replacement work throughout its MTW-eligible developments.

Site work: SHA will be installing garbage station fencing at Lictonwood (WA001000086), Cedarvale Village (WA001000038), Bitter Lake Manor (WA001000095) and 14349 32nd Ave NE (WA001000050). SHA will resurface and restripe the parking lots at Capitol Park (WA001000086), Stewart Manor (WA001000088), Carroll Terrace (WA001000094), Pleasant Valley Plaza (WA001000094), Lake City House (WA001000087) and multiple Scattered Sites properties (WA001000050). SHA will replace mailboxes at Island View (WA001000093) and several Scattered Sites properties (WA001000050). SHA also plans to install Rainwise systems at three MTW-eligible buildings in its portfolio (TBD) and replace sidewalks throughout its MTW-eligible properties. SHA will replace fencing at several Scattered Sites properties (WA001000050). SHA will make retaining wall repairs at 902 N 128th St (WA001000050). SHA will investigate flood barriers for the entry way of Blakeley Manor (WA001000095). SHA will also conduct tree trimming and landscaping at various Scattered Sites properties (WA001000050).

Windows and doors: SHA will replace windows at Bell Tower (WA001000015) and Westwood Heights (WA001000023). SHA plans to replace failing glazing units at Center Park (WA001000087). SHA will install window screens at Gideon-Mathews Gardens (WA001000094). SHA will replace exterior doors at 11308 3rd Ave NE (WA001000050) and secure the utility room doors at 1921 NE 145th St (WA001000050). SHA also plans to install door openers at common area doors at multiple LIPH properties.

B. Leasing information

i. Planned number of households served

Planned number of households served through:	Planned number of unit months occupied/leased	Planned number of households to be served
MTW public housing units leased ⁵	60,117	5,010
MTW Housing Choice Vouchers (HCV) utilized ⁶	120,304	10,025
Local, non-traditional: Tenant-based	180	30
Local, non-traditional: Property-based ⁷	16,817	1,402
Local, non-traditional: Homeownership	0	0
Planned total households served:	197,418	16,467

Local, non-traditional category	MTW activity name/number	Planned number of unit months occupied/leased	Planned number of households to be served
Tenant-based	MTW Activity #20: Local, non-traditional affordable housing strategies ⁸	180	30
Property-based	MTW Activity #8: Special purpose housing use	929	77
	MTW Activity #20: Local, non-traditional affordable housing strategies	16,817	1,402
Homeownership	None	0	0

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

Housing program	Description of anticipated leasing issues and possible solutions
MTW public housing	SHA does not anticipate leasing difficulties in 2024. New and continuing building rehab at several properties - including SHA's large high-rises - impacts the number of available public housing units. Despite these challenges, SHA anticipates that high occupancy levels will continue.

⁵ MTW Public Housing unit months leased/households also includes units in MTW Neighborhood Services-Occupied status which are used for housing.

⁶ Housing Choice Voucher unit months leased/households includes all voucher types included in HUD's Substantially the Same calculation.

⁷ Local, Non-Traditional: Property-based unit months leased/households includes households reported under MTW Activity #20 in the table below. It excludes households reporting in MTW Activity #8, as those units are accounted for in MTW public housing above (per Footnote 4).

⁸ The estimate for Local, Non-Traditional: Tenant-based unit months occupied/leased and Tenant-based households served is reflective of the fact that initial roll out of the program will occur throughout 2024, with an estimated total of 30 households being served by year end, but at varying numbers of unit months leased per family for an estimated total of 180.

Housing program	Description of anticipated leasing issues and possible solutions
MTW Housing Choice Voucher	Capacity remains tight and rent high in Seattle's rental market. HCV staff have been closely monitoring reopening efforts on both the market and on potential and current residents. Staff capacity has recently been increased to help applicants and residents navigate the confusing rental marketplace by utilizing MTW authority to streamline the income review process and increased housing search support. SHA may exhaust its current tenant-based waitlist before a new one can be established which may result in a brief gap in issuance of TBVs. However, leasing of project-based and Special Purpose Vouchers will continue. SHA is considering additional strategies to distribute tenant-based vouchers in 2024 and as part of this analysis is looking at tools to increase lease-up success for new households.
Local, non-traditional	SHA's LNT units typically do not have waiting lists so the agency must be nimble and adjust to the affordable housing market and needs of prospective renters. SHA has enacted strategies such as remote viewing of available units and other similar adjustments to support efficient lease-up. SHA anticipates that leasing will be strong throughout 2024.

C. Waiting list information

i. Waiting list information anticipated at the beginning of 2024

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Plans to open the waiting list during 2024
MTW public housing ⁹	Site-based	5,143	Open	Already open
MTW Housing Choice Voucher (tenant-based)	Community-wide	164	Closed	Yes
MTW Housing Choice Voucher (property-based) ¹⁰	Site-based	1,000	Partially open	Already open

ii. Planned changes to waiting list in 2024

Waiting list name	Description of planned changes to waiting list
MTW public housing	No changes anticipated.
MTW Housing Choice Voucher (tenant-based)	SHA plans to open the HCV tenant-based waitlist by the end of 2023. The agency will take the opportunity to examine alternative

⁹ SHA includes project-based units located in portfolios that also operate public housing in the public housing waiting list since 2019 using our MTW authority under Activity 15: Combined program management and selected LNT properties.

¹⁰ Many PBV units are managed by partners, who fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system, which maintains a central waitlist for permanent supportive housing units. The number entered here reflects the projects SHA partners with which maintain their own waiting lists outside the CEA.

Waiting list name	Description of planned changes to waiting list
	approaches to the lottery/waiting list that has been used in recent years. SHA may also make waiting list changes if new opportunities arise to administer additional vouchers or otherwise address local issues.
MTW Housing Choice Voucher (property-based)	No changes anticipated.

III. Proposed MTW activities

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

Proposed MTW activities

SHA is not proposing any new MTW activities in 2024.

Proposed MTW strategies

SHA is proposing two new MTW strategies in 2024.

SHA is proposing Strategy 12.A.03: Local asset limits for eligibility within MTW Activity 12: Waiting lists, preferences and admissions.

Strategy number	Description
MTW Strategy 12.A.03	Local asset limits for eligibility: SHA may establish local thresholds and local hardship policies for asset limits for admissions and continued occupancy.

A. Strategy description

SHA recognizes that the cost of living, particularly the cost of housing, in Seattle is much higher than most areas in the country. In fact, Seattle is in the top 10 cities in the US in terms of cost of living. HUD has recently rolled out a new policy that limits a household's assets to \$100,000 for admission to Public Housing or HCV, as well as to remain in either program. This new policy stems from the federal Housing Opportunities through Modernization Act (HOTMA) adopted by Congress in 2016.

Due to the extraordinarily high cost of living and housing in Seattle, assets of \$100,000 for the low income subsidized housing participants does not have the same buying power as other parts of the country and may not be the right threshold for SHA. Factoring in the HUD allowable exceptions to asset types (retirement and educational saving accounts), SHA currently serves 79 households that would potentially be facing eviction or termination from Public Housing or the HCV program. Of these households, 73 are entirely elderly/disabled and 3 are households with children. The average income of these households is below 30% AMI (\$25,550 annually), including any income they earn from their financial assets. Enforcing a \$100,000 asset limitation would result in the eviction/program termination of these vulnerable households.

Therefore, SHA may adopt local asset limits for admission and continued occupancy (eligibility) that reflect the local area housing market. The agency may determine a higher asset limit that will balance serving as many low-income families as possible with enabling housing stability for impacted households. SHA also may also establish hardship policies for the asset limitation which may take into consideration such factors as age, disability, income, the ability of the family to find suitable alternative housing and whether supportive services are being provided.

SHA will continue to count income from assets towards a household's rent/rent portion as part of SHA's standard rent policy (see *Section I: Short-term goals and objectives* and the updates to *Activity 10: Local rent policy* for additional information on SHA's overall rent policy strategy).

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

This activity will further the Housing Choice statutory objective of the MTW program. Without a local approach to asset limits, potential and current low-income households will be prevented from accessing or maintaining housing affordable at their income levels. This would significantly reduce the number of affordable housing units available to these households. Of SHA's existing households, this would disproportionately affect elderly/disabled households, who not only face undue burdens in housing search but also who often experience mental and physical hardships when moving units as well. Setting a local threshold and maintaining a reasonable hardship policy will provide needed access to affordable housing units for low income households in their communities.

SHA intends to update its HCV Administrative Plan and the Admissions and Continued Occupancy Policy with any local limits or hardship considerations following the approval of the 2024 MTW Plan.

A. Activity metrics information

SHA will not be adding any new metrics for this strategy since its implementation will involve no changes to SHA's practices.

B. Cost implications

SHA does not anticipate any noteworthy cost implications of this strategy.

C. Need/justification for MTW flexibility

This MTW strategy is authorized under *Attachment C Section C(2): Local preferences and admissions and continued occupancy policies and procedures* and *Section D(3)(b): Eligibility of participants*. Under each section, MTW agencies are authorized to "develop and adopt local preferences and admissions policies and procedures for admission into the public housing" and "adopt and implement any reasonable policy for [...] determining resident eligibility" for HCV.

SHA is proposing Strategy 20.A.02: Reintegration housing program within its existing approved MTW Activity 20: Local non-traditional affordable housing strategies.

Strategy number	Description
MTW Strategy 20.A.02	Reintegration housing program: SHA may operate a program to provide short-term bridge housing for households with at least one member returning to the community from incarceration.

A. Strategy description

i. *Describe the proposed strategy.*

The United States criminal justice system has disproportionately criminalized communities of color through policy and practice. Between April 2019 and April 2022, a total of 3,696 individuals were released from prisons in Washington State into King County. Approximately 10% of individuals released in the last three years were released to homelessness and almost a third of that population are Black. As an affordable housing provider, SHA recognizes that experiencing incarceration exacerbates challenges in securing and maintaining housing and increases the likelihood of experiencing homelessness, which leaves individuals increasingly vulnerable to repeat interactions with the criminal justice system. With this program intended to provide bridge housing and reintegration support for justice-involved individuals (JIs), SHA hopes to have an enduring impact on addressing the inequities caused by the criminal justice system. Support services and community resources will be essential to the success of the program and SHA's partners who are already doing this work will play a significant role in helping JIs achieve the self-sufficiency needed to successfully reintegrate.

SHA has developed relationships with individuals who have recently reintegrated into our community and partners/providers who focus on meeting the needs of people who are reintegrating to inform the design of a program to address this need. Stemming from this, SHA is proposing to leverage its HUD-approved local non-traditional housing activity to offer a new strategy, *20.A.02: Reintegration housing program*. This program will focus on supporting low-income households who have at least one member returning to their community from incarceration in a state or federal prison and is impacted by systemic inequities that drive gaps in being stably housed.

The program will provide housing subsidy to eligible households (up to an equivalent of SHA's Voucher Payment Standard for their household size) for a defined period to facilitate greater opportunity for stabilization, improved economic situation and general ability to thrive. The rent policy for this proposed strategy will be structured to encourage and support economic self-sufficiency. This rent policy will apply to all households participating in the program from the start and will remain in effect for the full duration of their participation. In cases when there is no household income at the time that the program participant is released from incarceration, the program may provide participants a reduced rent or higher subsidy for a short period of time. In rare cases where a household reaches the program term limit before having secured long-term housing, families may contact SHA to be approved for an extension to their term-limited subsidy. Criteria for consideration might include evidence that the household was actively seeking long-term housing (e.g., currently on waitlist for a Section 8 voucher or public housing unit). The program may require participants to engage with a case manager in order to extend program participation or to qualify for hardship.

SHA seeks to engage community partners to provide vital services for successful reintegration and possibly to administer the program. The priority for SHA funds is the housing subsidy. However, SHA may fund some activities to augment services that are available in the community.

The final program details will be informed by the communities impacted and service providers who work with JIs and their families and it may evolve accordingly.

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

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

Housing choice: Individuals who have spent time in prison are nearly 10 times more likely to face homelessness than people who have not experienced incarceration and those who have been recently released from prison are more than twice as likely to be homeless as those who have been out of prison for four years or longer. This is largely in part because affordable housing units are limited, housing support resources are not centrally located or easily accessible and individuals with criminal backgrounds face increased challenges in renting in the private market.

Self-sufficiency: Assisting JILs and their families in securing and maintaining stable housing will support them to establish and increase their financial self-sufficiency. When individuals are released from incarceration, whether it be after a year or decades have passed, it can be challenging for them to find and secure housing and employment. This new strategy will support their long-term self-sufficiency since safe, stable housing is a core foundation for long-term wellbeing, including physical and behavioral health and economic status.

SHA aims to finalize programmatic details by the end of 2023 and begin implementation of this new reintegration housing pilot program in 2024, after approval of the 2024 MTW Plan. SHA will provide updates to HUD in future MTW Plans as required or at HUD's request.

B. Metrics information

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

Metric(s)	Description	Baseline	Benchmark	Final projected outcome	Data source(s)
Housing choice #7: Households assisted by services that increase housing choice	Total number of households served per year	0 households served	30 households served	Not applicable	SHA will collect data from service partners.
Self-sufficiency #5: Households assisted by services that	Total number of households receiving services aimed to increase self	0 households served	22 households served	Not applicable	SHA will collect data from service partners.

increase self-sufficiency	sufficiency (increase)				
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C. Cost implications

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

The program is intended to serve 30 households at any given time during the first three or so years. The estimated financial implication to SHA is generally consistent with costs of standard housing programs and related supportive services. SHA anticipates that the average subsidy paid/rent collected over duration of participation will be similar to that of new move ins in Public Housing or the Housing Choice Voucher program, who are typically well below 30% of area median income and at times lower their income after move in to pursue education and job training toward longer term self-sufficiency. The program may also invest in households with one-time financial support for move in and household setup costs, which SHA has already done in other programs such as Emergency Housing Voucher and Creating Moves to Opportunity. It may also invest in service coordination or similar services not otherwise available in the community. SHA regularly funds supportive services with MTW block grant flexibility.

D. Need/justification for MTW flexibility

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

The MTW Standard Agreement allows for MTW agencies to use Block Grant dollars to fund Local, Non-Traditional programs which provide housing and services for families with low incomes outside of the rules of Sections 8 and 9 of the Housing Act of 1937, providing such programs comply with the other requirements of the MTW statute. Specifically, SHA is citing *Attachment D: Use of MTW Funds* and *Attachment C(B)(1): Single fund budget with full flexibility* (as amended by *Attachment D(B): Authorizations related to both Public Housing and Section 8 Housing Choice Vouchers*).

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 active, not yet implemented, on hold or closed out. Some strategies within an activity may be inactive or closed out and are indicated as such under their appropriate heading. To date, HUD has approved 22 MTW Activities, which are:

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

17. Performance standards

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

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

Emergency response and recovery

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

A. Implemented activities

MTW Activity #1: Development simplification

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated ¹¹
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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

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

MTW activity #2: Family self-sufficiency program

Status

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

Description

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

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

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

Approved strategies in this activity are as below.

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

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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #3: Inspection protocol

Status

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

Description

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

Approved strategies in this activity are as below.

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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #5: Local leases

Status

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

Description

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

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

Approved strategies in this activity are as below.

c	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
5.A.01	Self-sufficiency requirement: All households receiving subsidy from SHA (public housing or voucher) in HOPE VI communities must participate in self-sufficiency activities.	1999 MTW Plan	Activated in 1999 Inactivated in 2022	2005 2005-R 2022
Voucher strategies				
5.H.01 (Recategorized from 9.H.06 in 2021)	HAP contracts: SHA may modify the HAP contract and Tenancy Addendum.	2000 MTW Plan	Activated in 2000	2000-R 2021 2022
Public housing strategies				
5.P.01	Local lease: SHA may implement its own lease, incorporating industry best practices.	2001 MTW Plan	Activated in 2011	2004 2005 2005-R 2009 2010 2011
5.P.02	Grievance procedures: Modify grievance policies to require tenants to remedy lease violations and be up to date in their rent payments before granting a grievance hearing for proposed tenancy terminations.	2008 MTW Plan	Not yet implemented	None
5.P.03	Lease term for public housing units: SHA may offer lease renewals for six months or month-to-month time periods.	2009 MTW Plan	Activated in 2009	2012
5.P.04	Property-specific pet policies: SHA may establish pet policies, which may include the continuation or establishment of pet-free communities or limits on the types of pets allowed, on a building by building basis.	2011 MTW Plan	Activated in 2011	None

c	Description	First identified	Status	Year(s) updated
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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #8: Special purpose housing use

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	First implemented	Year(s) updated
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

Strategy	Description	First identified	First implemented	Year(s) updated
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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #9: Project-based program

Status

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

Description

SHA uses MTW to develop and implement a local project-based program, providing vouchers to subsidize units in SHA-owned and privately owned properties throughout Seattle. SHA's project-based activities include a large number of MTW strategies to reduce costs, make project-based programs financially feasible for owners and to provide housing choice in the city. The project-based program promotes housing choice through strategies such as offering site-specific waiting lists maintained by providers (and, therefore, does not issue exit vouchers), expanding the definition of eligible unit types, allowing more project-based units per development and overall, reallocating vouchers to programs and providers (not just units) 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 allow for contract terms consistent with requirements for other leveraged funding sources.

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

Approved strategies in this activity are as below:

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

Strategy	Description	First identified	Status	Year(s) updated
9.H.06	Recategorized as 5.H.01 (2021)			
9.H.07	Non-competitive allocation of assistance: Allocate project-based subsidy non-competitively to SHA controlled units, including non-contiguous project-based units within a portfolio.	2000 MTW Plan	Activated in 2000	2001 2005-R 2018
9.H.08	Owners may conduct new and turnover inspections: SHA may allow project-based owners to conduct their own new construction/rehab inspections and to complete unit turnover inspections	2000 MTW Plan	Activated in 2005	None
9.H.09	Percent of vouchers that may be project-based: Raise the percentage of vouchers that may be project-based above HUD limits, including exclusion of replacement vouchers and calculation based on authorized number of vouchers.	2000 MTW Plan	Activated in 2000	2008 2008-R 2011 2016
9.H.10	Unit cap per development: Waives the 25% cap on the number of units that can be project-based in a multi-family building without supportive services or elderly/disabled designation.	2000 MTW Plan	Activated in 2008	None
9.H.11	Rent cap-30% of income: Project-based participants cannot pay more than 30% of their adjusted income for rent and utilities.	2000 MTW Plan	Activated in 2000 Inactivated in 2011	2011
9.H.12	Streamlined admissions: SHA may streamline and centralize applications and waiting list processes for project-based HCV units.	2000 MTW Plan	Activated in 2000	2010-R 2017
9.H.13	Competitive allocation process: Commit vouchers to the City's competitive process for housing funding.	2004 MTW Plan	Activated in 2005 Inactivated in 2011	2011
9.H.14	Payment standards for SHA units: Allows higher than Voucher Payment Standard for SHA-operated project-based units if needed to support the project budget (while still taking into account rent reasonableness).	2004 MTW Plan	Activated in 2004	2005-R
9.H.15	Subsidy cap in replacement units: Cap subsidy at levels affordable to households at 30% AMI in project-based HOPE VI replacement units where SHA also contributed capital to write-down the unit's affordability to that level.	2004 MTW Plan	Activated in 2004 Inactivated in 2011	2011
9.H.16	Admissions-admit people with felony records under certain conditions: Allows for the admission into Project-based Voucher units of people with	2005 MTW Plan	Activated in 2005	2005-R

Strategy	Description	First identified	Status	Year(s) updated
	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.			
9.H.17	Program-based vouchers: Allocate floating voucher subsidy to a defined group of units or properties.	2003 MTW Plan	Activated in 2004	2003-R
9.H.18	Provider-based vouchers: Provide vouchers to selected agencies to couple with intensive supportive services. The agency master leases units and subleases to tenants.	2007 MTW Plan	Activated in 2007	None
9.H.19	Streamlined admissions and recertifications: SHA may streamline admissions and recertification processes for provider-based and project-based programs.	2009 MTW Plan	Not yet implemented	None
9.H.20	Partners maintain own waiting lists: Allow partners to maintain waiting lists for partner-owned and/or operated units/vouchers and use own eligibility and suitability criteria.	2000 MTW Plan	Activated in 2000	None
9.H.21 (Recategorized from 9.H.20 in 2013)	COPES housing assistance payment calculations: Count as zero income for residents who are living in project-based units at assisted living properties where Medicaid payments are made on their behalf through the COPES system	2012 MTW Plan	Activated prior to MTW implementation	2013

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #10: Local rent policy

Status

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

Description

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
10.A.01	Streamlined income verification: SHA may adopt local rules-regarding the length of time income verification is considered valid and a local verification hierarchy.	2014 MTW Plan	Activated in 2014	2020 2021 2022
10.A.02 (Recategorized from 10.P.23 in 2021)	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2014 MTW Plan	Activated in 2015	2018 2019 2021
10.A.03 (Combined 10.H.12 and 10.P.19 in 2023)	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 2023
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	2003 MTW Plan	Activated in 2003	2003 2006 2008 2011

Strategy	Description	First identified	Current status	Year(s) updated
	market-rate and affordable housing and shared housing.			2012 2015 2016 2017 2018 2019 2020 2021
10.H.05	Absolute minimum rent: The minimum rent for all residents will be established annually by SHA. No rent will be reduced below the minimum rent amount by a utility allowance.	2003 MTW Plan	Not yet implemented	2005
10.H.06	Payment standard-SROs: SHA may use the studio payment standard for SRO units.	2003 MTW Plan	Activated in 2003	None
10.H.07	Tenant-based self-sufficiency incentives: Rent policies to foster self-sufficiency among employable households, including income disregards proportional to payroll tax; allowances for employment-related expenses; intensive employment services coupled with time limits; locally defined hardship waivers.	2005 MTW Plan	Not yet implemented	None
10.H.08	Imputed income from TANF: Impute TANF income if household appears eligible and has not documented ineligibility. TANF not counted toward income if family is sanctioned.	2006 MTW Plan	Not yet implemented	None
10.H.09	Rent reasonableness streamlining: Allows SHA to streamline rent reasonable determinations, including automatic annual updates and shared housing.	2006 MTW Plan	Activated in 2016	2008 2016 2017 2018 2021
10.H.10	Income reviews conducted for households with 100% elderly and/or disabled adults only every three years (within a period of 40 months).	2009 MTW Plan	Activated in 2010	2013 2014 2015 2020 2021
10.H.11	Recategorized as 13.H.02. See Activity #13.			
10.H.12	Recategorized as 10.A.03 in 2023.			
10.H.13	Streamlined medical deduction: SHA will allow self-certification of medical expenses.	2010 MTW Plan	Activated in 2011	2015
10.H.14	Simplified utility allowance schedule: HCV participants' rent will be adjusted for a Utility Estimate based on the number of bedrooms (defined as the lower of voucher size or actual unit size) and tenant responsibility for payment of energy, heat, and sewer/water under their lease, with a proration for energy-efficient units.	2011 MTW Plan	Activated in 2011	2023

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

Strategy	Description	First identified	Current status	Year(s) updated
10.P.12	Utility allowance-schedule: SHA may change utility allowances on a schedule different for current residents and new move-ins.	2008 MTW Plan	Activated in 2008	None
10.P.13	Streamlined for fixed income: Further streamline rent policy and certification process for fixed income households, including self-certification of medical expenses.	2009 MTW Plan	Activated in 2014	2015
10.P.14	Streamlined rent policy for partnership units: Allow non-profit partners operating public housing units to implement simplified rent policies.	2009 MTW Plan	Not yet implemented	None
10.P.15	Utility allowance: frequency of utility allowance updates: SHA may revise the schedule for reviewing and updating utility allowances due to fluctuations in utility rates.	2009 MTW Plan	Activated in 2010	2010 2018
10.P.16	Utility allowance: local benchmark: SHA may develop new benchmarks for "a reasonable use of utilities by an energy conservative household" - the standard by which utility allowance are calculated.	2009 MTW Plan	Not yet implemented	None
10.P.17	SSHP rent policy: Rents in SSHP units will be one of five flat rents based on the tenant's percentage of Area Median Income, with annual adjustments and income reviews only every three years.	2011 MTW Plan	Activated in 2011	2018 2021
10.P.18	No HUD-defined flat rents: SHA does not offer tenants the choice of "flat rents" as required of non-MTW agencies (includes alternate calculation for mixed citizenship households).	2000 MTW Plan	Activated in 2001	2000 2017
10.P.19 (Recategorized from 10.P.17 in 2013)	Recategorized as 10.A.03 in 2023			
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	2014 MTW Report	Activated in 2014	2014

Strategy	Description	First identified	Current status	Year(s) updated
	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.			
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

2024 Updates

SHA has the following update to the implementation of two existing strategies under Activity 10:

Strategies 10.H.12: Asset income threshold and 10.P.19: Asset income threshold: SHA currently has two strategies affecting the same process, one for public housing and one for HCV. In this Plan, the agency is combining these two strategies into one strategy for consistency. SHA will continue to use its income threshold and self-certification thresholds as adopted as outlined in the ACOP and Admin Plan.

SHA also has the following clarification to the implementation of Activity 10: Local Rent Policy as a suite of strategies:

Since obtaining MTW authority to establish local rent policy in 2000, SHA has utilized its MTW authority to adopt a comprehensive and interconnected set of policies and to make several refinements to streamline our income calculation processes. The processes for determining income and rent in subsidized housing programs are complex and burdensome for participants and staff, and our current income calculation processes are designed to work together to simplify and streamline the process of income calculation and rent determination. Changing any one element would have significant ripple effects. SHA intends to maintain consistency by utilizing current rent and income determination procedures as outlined in its Admission and Continued Occupancy Policy and HCV Administrative Plan. SHA will take a comprehensive look at opportunities to decrease the burden of its income and rent determination processes and may make a comprehensive set of recommendations that account for ripple effects in 2024.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #11: Resource conservation

Status

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

Description

SHA's resource conservation strategies take advantage of the agency's existing relationships with the City of Seattle and local utility providers to 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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #12: Waiting lists, preferences and admissions

Status

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

Description

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

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

Approved strategies in this activity are as below.

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

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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #13: Homeownership and graduation from subsidy

Status

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

Description

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

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

Approved strategies in this activity are as below.

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

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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

One of the buildings used in the evaluation metrics for *Strategy 13.P.02: Incentives for positive tenant departures and housing stability*, Jefferson Terrace, will be offline for much of 2022-2024 for a significant rehabilitation project. Jefferson Terrace will be removed from the properties measured for the strategy until, at the earliest, the building has fully come back online.

Planned significant changes

None.

MTW Activity #15: Combined program management

Status

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

Description

In some of its communities/portfolios, 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/portfolio 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/portfolios 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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #18: Short-term assistance

Status

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

Description

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

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

Approved strategies in this activity are as below.

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

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #19: Mobility and portability

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
19.H.01	Limiting portability in high-cost areas: SHA may deny requests for portability moves to another jurisdiction when the receiving housing authority intends to administer rather than absorb the voucher and the resulting payment standard would be higher than SHA's payment standard.	2013 MTW Plan	Not yet implemented	None
19.H.02	Housing choice moving cost assistance and support: SHA may develop a program for voucher households to provide assistance with housing search, access supplements, deposits and similar costs, outreach and incentives for landlord participation such as risk reduction funds and access supplements.	2014 MTW Plan	Activated in 2015	2015 2017 2018 2022
19.H.03	One-year residency requirement before port out: SHA may require that Housing Choice Voucher households live in Seattle for one year before 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 timelines and processes to support leasing success and improve efficiency	2019 MTW Plan	Activated in 2019	None

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

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

Status

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

Description

SHA sometimes uses MTW Block Grant funds to support affordable housing outside of the standard 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, capitally 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

2024 Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

See proposed strategy 20.A.02 in Section III.

MTW Activity #22: Housing assistance for school stability

Status

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

Description

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

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

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

Approved strategies in this activity are as below.

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

Strategy	Description	First identified	Status	Year(s) updated
	children at selected neighborhood schools.			

2024 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

B. Not-yet-implemented activities

MTW Activity #21: Self-sufficiency assessment and plan

Status

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

Description

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

Approved strategies in this activity are as below.

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

Reactivation

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

C. Activities on hold

MTW Activity #4: Investment policies

Status

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

Description

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

Approved strategies in this activity are as below.

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

Reactivation

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

D. Closed out activities

MTW Activity #6: MTW block grant and fungibility

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #7: Procurement

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #14: Related nonprofits

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

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

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #17: Performance standards

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

V. Planned application of MTW funds

A. Planned application of MTW funds

i. Estimated sources of MTW funds

FDS line item number	FDS line item name	Dollar amount
70500 (70300+70400)	Total tenant revenue	\$ 15,904,000
70600	HUD PHA operating grants	\$ 266,390,000
70610	Capital grants	\$ 16,788,000
70700 (70710+70720+70730+70740+70750)	Total fee revenue	\$ 0
71100+72000	Interest income	\$ 503,000
71600	Gain or loss on sale of capital assets	N/A ¹²
71200+71300+71310+71400+71500	Other income	\$ 1,909,000
70000	Total revenue	\$ 301,494,000

ii. Estimated application of MTW funds

FDS line item number	FDS line item name	Dollar amount
91000 (91100+91200+91400+91500+91600+ 91700+91800+91900)	Total operating - Administrative	\$ 34,235,000
91300+91310+92000	Management fee expense	\$ 9,139,000
91810	Allocated overhead	N/A
92500 (92100+92200+92300+92400)	Total tenant services	\$ 204,000
93000 (93100+93600+93200+93300+93400+ 93800)	Total utilities	\$ 6,395,000
93500+93700	Labor	N/A
94000 (94100+94200+94300+94500)	Total ordinary maintenance	\$ 16,011,000
95000 (95100+95200+95300+95500)	Total protective services	\$ 166,000
96100 (96110+96120+96130+96140)	Total insurance premiums	\$ 2,448,000
96000 (96200+96210+96300+96400+96500+ 96600+96800)	Total other general expenses	\$ 1,757,000
96700 (96710+96720+96730)	Total interest expense & amortization cost	N/A
97100+97200	Total extraordinary maintenance	\$0
97300+97350	HAP + HAP portability-in	\$ 158,822,000

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

FDS line item number	FDS line item name	Dollar amount
97400	Depreciation expense	N/A
97500+97600+97700+97800	All other expense	\$ 27,306,000
90000	Total expenses	\$ 256,483,000

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

The Estimated MTW Sources exceed Estimated MTW Uses for various reasons. The summary of expenditures table does not include capital expense, which account for approximately \$16.8 million. Seattle Housing Authority's planned capital expense budget is not part of the Uses table, but capital is shown as a source. In addition, the Uses table does not include \$28.1 million that Seattle Housing Authority plans to spend on local housing, programs and services for voucher and public housing participates. These services include career coaching, youth engagement, resident services, and education, parks operations in low-income communities, and planning for and redevelopment of low-income housing. See the description of single fund flexibility that follows this section for a discussion of expenses not included within the uses table.

iii. Description of planned application of MTW funding flexibility

Planned application of MTW funding flexibility
<p>Seattle Housing Authority established an MTW Block Grant Fund under the original MTW Agreement and continues to use single-fund flexibility under the Amended and Restated MTW Agreement, (as extended in 2016 to 2028.) MTW Block Grant single-fund 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. Seattle Housing Authority exercises its MTW authority to move funds and project cash flow among projects and programs, as the agency deems necessary to further its mission and strategic plan, cost objectives, statutory compliance, and local housing needs.</p> <p>The agency analyzes its housing, rental assistance, tenant and community services, sustainability services, administrative, and capital needs annually through the budget process to determine the level of service and resource needs to meet the agency's strategic objectives. Seattle Housing Authority's single-fund flexibility allows allocation of MTW Block Grant revenues among Seattle Housing Authority's programs. This enables the agency to balance mixes of housing types, tenant services, administrative support, and capital investments in preservation and development of low-income housing. It also enables the agency to tailor resource allocation to best achieve our cost, program, and strategic objectives and therefore maximize our services to low-income residents and applicants to meet their varied needs.</p> <p>The bulk of Seattle Housing Authority's use of its MTW single fund authority is focused on activities in MTW communities, support of low-income housing development and preservation, and services for Low-Income Public Housing and Housing Choice Voucher participants. Examples are:</p> <ul style="list-style-type: none"> Community supportive services, including deepening commitment to youth education by expanding external partnerships and focusing on youth engagement

Planned application of MTW funding flexibility

by developing emotional supports and pro-social behaviors. Continue youth tutoring; job training and betterment activities for high school youth; aging in place services, and leverage health related programs that provide participants with critical health care and stability services. Continue to support SHA residents and participants on their journey toward self-sufficiency and evaluate ways to improve housing stability.

- Parks and open spaces for our low-income communities with play opportunities for children, active and team sports activities for youth, and passive and active exercise options for all.
- Planning, pre-development, construction, and construction services for asset preservation, public housing redevelopment and opportunities to increase affordable housing for low-income people.

The MTW Block Grant will enable Seattle Housing Authority to:

- Evaluate and find long term financial stability options to strategically address capital and operating needs and environmental sustainability of our communities.
- Continue addressing the maintenance and repair of residential units that were deferred or unreported by residents during COVID pandemic.
- Increase housing inspection capacities and implement preventative maintenance, reduce lead base paint, and address overall unit quality to improve resident satisfaction.
- Address the backlog of over-housed units that are inadequately sized for resident needs. Optimize the use of larger units by relocating residents to appropriate sizes and making larger units available for larger households.
- Continue the concentrated effort to enhance both interior and exterior building conditions in the Low-Income Public Housing and Scattered Sites portfolios.
- Evaluate SHA's buildings energy efficiency by dedicating a Sustainability Analyst advisor. Analyze methods to meet and surpass voluntary and emerging regulatory requirements for energy performance. Preparing to meet and exceed these new and emerging local regulations will advance SHA's work for environmental justice within our building portfolios.
- Relace SHA's outdated Enterprise Resource Planning system, which the vendor will no longer support in the coming years. Integrate the new system with SHA's business needs and infrastructure.
- Review the agency's workflows to continually enhance process improvements throughout the agency that allow SHA staff to work more efficiently and effectively to better support residents and voucher holders.
- Establish a dedicated leasing support team to streamline the lease up process for both newly developed and rehabilitated projects and shorten the lease up time. The leasing team will reduce workload on existing property management staff.

B. Planned application of SHA's unspent operating fund and HCV funding¹³

Original funding source	Beginning of 2024 - unspent balances	Planned application of PHA unspent funds during 2024
HCV HAP*	\$ -	\$ -
HCV admin fee	\$ -	\$ -
PH operating subsidy	\$ -	\$ -
Total:	\$ -	\$ -

Description:

Note: MTW reserves are fungible and not designated as HCV HAPS, HCV Admin Fee, or PH Operating Subsidy

SHA plans to maintain its reserve balance in order to meet unforeseen urgent and emergency needs that may arise in the future. SHA does not presently have 4 months of reserves for our MTW funds.

C. Local asset management plan

- i. Is SHA allocating costs within statute?
- ii. Is SHA implementing a local asset management plan (LAMP)?
- iii. Has SHA provided a LAMP in the appendix?
- iv. If SHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in 2022 or state that SHA does not plan to make any changes in 2024.

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

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

No changes are proposed.

¹³ Unspent balances and planned application of unspent funds forthcoming.

D. Rental Assistance Demonstration participation

i. Description of Rental Assistance Demonstration (RAD) participation

Rental Assistance Demonstration (RAD) participation	
N/A	

ii. Has SHA submitted a RAD significant amendment in the appendix? N/A

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

N/A

VII. Administrative

A. Board resolution and certifications of compliance

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

B. Documentation of public process

The public comment period for the MTW Annual Plan begins on August 31, 2023 and concludes on September 30, 2023. Extensive efforts will be made to make participants and the public aware of the availability of the Plan and comment period, including posting in the *Daily Journal of Commerce*, messages in *The Voice*, a resident e-newsletter that reaches thousands, and flyers in buildings and common areas. The draft Plan is publicly available on SHA's website (www.seattlehousing.org) and by requesting a copy (see Plan cover page for contact information). A public hearing will be held in person (with a remote option) on September 12, 2023 at 3:00 pm. Language interpretation and disability accommodations are made available by request. Any changes made as a result of the public hearing and comment period will be included in the final version of the MTW Plan.

Staff will also meet remotely with SHA's two resident advisory groups, the Joint Policy Advisory Committee and Senior Joint Policy Advisory Committee, in September to discuss the Plan activities and proposed updates. Results of these meetings and processes will be taken into consideration in finalizing the MTW Plan.

Documentation of the public process will be presented to the Board of Commissioners in October and can be made available to HUD upon request.

C. Planned and ongoing evaluations

SHA is not currently engaged in any third-party agency-wide evaluations of its MTW program. No external MTW evaluations are planned for 2024.

D. Lobbying disclosures

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

Appendix A: Planned existing project-based vouchers

The below table consists of the tenant-based vouchers that SHA is currently project-basing in 2024. Some properties may have more than one existing AHAP/HAP contract with SHA and may be listed two or more times. This section meets the requirements prescribed in HUD Form 50900 Section II.A.iv. "Planned Existing Project Based Vouchers."

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
2nd & 3rd	29	Leased	No	Permanent supportive housing
13 th & Fir	92	Leased	No	Affordable housing
104 th St. Townhomes	3	Leased	No	Affordable housing
A Place of Our Own	19	Leased	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	Leased	No	Enhanced behavioral health services
Aldercrest	8	Leased	No	Affordable housing
Almquist Apartments	52	Leased	No	Permanent supportive housing
Arbora Court	40	Leased	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	Leased	No	Affordable housing
Aurora House	30	Leased	No	Permanent supportive housing
Avalon Place	9	Leased	No	Permanent supportive housing
Baldwin Apartments	15	Leased	No	Affordable housing
Bayview Tower	33	Leased	No	Affordable housing
Beacon House	6	Leased	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	Leased	No	Affordable housing
Bergan Place	2	Leased	No	Homeless young adults
Bergan Place	8	Leased	No	Affordable housing
Brettler Family Place I	51	Leased	No	Service-enriched for homeless families (with at least one minor)
Brettler Family Place II	21	Leased	No	Service-enriched for homeless families (with at least one minor)
Broadway Crossing	10	Leased	No	Service-enriched for homeless individuals
Broadway Crossing	9	Leased	No	Service-enriched for homeless families (with at least one minor)
Bush Hotel	7	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Casa Pacifica	6	Leased	No	Affordable housing
Casa Pacifica	5	Leased	No	Affordable housing
Cascade Court Apartments	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Cascade Court Apartments	5	Leased	No	Affordable housing
Cate Apartments	10	Leased	No	Affordable housing
Cate Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Cedar Crossing	7	Leased	No	Affordable housing
Centerwood Apartments	2	Leased	No	Affordable housing
Cluster SMH	14	Leased	No	Enhanced behavioral health services
Colonial Gardens	20	Leased	No	Affordable housing
Columbia Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	16	Leased	No	Affordable housing
Community Psychiatric Clinic	14	Leased	No	Enhanced behavioral health services
Compass Broadview	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	Leased	No	Permanent supportive housing
Compass on Dexter	36	Leased	No	Service-enriched for homeless individuals
Council House	30	Leased	No	Senior housing
Crestwood Place Apartments	6	Leased	No	Affordable housing
Croft Place	7	Leased	No	Affordable housing
David Colwell Building	25	Leased	No	Affordable housing
Dekko Place	5	Leased	No	Affordable housing
Delridge Heights Apartments	3	Leased	No	Affordable housing
Delridge Triplexes	6	Leased	No	Affordable housing
Denny Park Apartments	5	Leased	No	Affordable housing
Denny Park Apartments	8	Leased	No	Service-enriched for homeless families (with at least one minor)
DESC	12	Leased	No	Enhanced behavioral health services

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Eastern Hotel	4	Leased	No	Affordable housing
Eastlake Supportive Housing	25	Leased	No	Permanent supportive housing
Emerald City Commons	12	Leased	No	Affordable housing
Ernestine Anderson Place	33	Leased	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	Leased	No	Permanent supportive housing
Evans House	49	Leased	No	Permanent supportive housing
Fir Street Apartments	7	Leased	No	Affordable housing
First Place	4	Leased	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	Leased	No	Senior housing
Four Freedoms House	126	Leased	No	Senior housing
Fremont Solstice Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	Leased	No	Service-enriched for homeless families (with at least one minor)
The Genessee	17	Leased	No	Affordable housing
The Genessee	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Golden Sunset	36	Leased	No	Affordable housing project
Gossett Place	12	Leased	No	Permanent supportive housing
Gossett Place	28	Leased	No	Permanent supportive housing
High Point	100	Leased	No	Affordable housing
Hilltop House	30	Leased	No	Senior housing
Hinoki	82	Leased	No	Affordable housing
Hoa Mai Gardens	70	Leased	No	Affordable housing
Hobson Place	63	Leased	No	Permanent supportive housing
Holden Manor	1	Leased	No	Affordable housing
Holden Street Family Housing (Saint Teresita del Niño Jesus)	25	Leased	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	Leased	No	Affordable housing
Humphrey House	71	Leased	No	Permanent supportive housing
Imani Village	8	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Jefferson Terrace	283	Leased/Issued	No	Affordable housing
Josephinum Apartments	25	Leased	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	Leased	No	Service-enriched for homeless individuals
Judkins Park	4	Leased	No	Affordable housing
Judkins Park	4	Leased	No	Service-enriched for homeless families (with at least one minor)
The Julie Apartments	20	Leased	No	Affordable housing
The Julie Apartments	2	Leased	No	Affordable housing
The Julie Apartments	6	Leased	No	Service-enriched for homeless individuals
The Karlstrom	17	Leased	No	Service-enriched for homeless individuals
Kebero Court	83	Leased	No	Affordable housing
Kenyon Housing	18	Leased	No	Permanent supportive housing
Kerner-Scott House	15	Leased	No	Permanent supportive housing
Kingway Apartments	16	Leased	No	Service-enriched for homeless families (with at least one minor)
Kristin Benson Place	77	Leased	No	Permanent supportive housing
Lake City Commons	15	Leased	No	Affordable housing
Lake Washington Apartments	37	Leased	No	Affordable housing
Lakeview Apartments	15	Leased	No	Affordable housing
Lakeview Apartments	5	Leased	No	Affordable housing
Lakeview Apartments	6	Leased	No	Affordable housing
Legacy House	22	Leased	No	Senior housing
Leschi House	35	Leased	No	Senior housing
Lewiston Apartments	28	Leased	No	Permanent supportive housing
Lincoln Apartments	4	Leased	No	Affordable housing
Lyon Building	12	Leased	No	Permanent supportive housing
Main Street Apartments	2	Leased	No	Affordable housing
Main Street Place	8	Leased	No	Affordable housing
Marion West	25	Leased	No	Service-enriched for homeless individuals
Martin Court	28	Leased	No	Service-enriched for homeless individuals

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Martin Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Jr. Apartments	10	Leased	No	Affordable housing
Martina Apartments (fka CHS Greenwood)	66	Leased	No	Permanent supportive housing
Mary Avenue Townhomes	8	Leased	No	Affordable housing
McDermott Place	15	Leased	No	Permanent supportive housing
McDermott Place	10	Leased	No	Permanent supportive housing
Meadowbrook View Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Mercer Court	3	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	5	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	10	Leased	No	Service-enriched for homeless families (with at least one minor)
MLK Properties	6	Leased	No	Affordable housing
Monica's Village Place	38	Leased	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	Leased	No	Affordable housing
Morrison Hotel	190	Leased	No	Permanent supportive housing
Muslim Housing	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	5	Leased	No	Service-enriched for homeless families (with at least one minor)
Nihonmachi Terrace	20	Leased	No	Affordable housing
Nihonmachi Terrace	5	Leased	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	Leased	No	Affordable housing
NP Hotel	5	Leased	No	Affordable housing
Oleta Apartments	6	Leased	No	Affordable housing
One Community Commons	5	Leased	No	Service-enriched for homeless individuals
One Community Commons	7	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Opportunity Place	145	Leased	No	Permanent supportive housing
Ozanam House (formerly Westlake II)	29	Leased	No	Permanent supportive housing
Pacific Hotel	6	Leased	No	Permanent supportive housing
Palo Studios at the Josephinum	7	Leased	No	Service-enriched for homeless individuals
Pantages Apartments	10	Leased	No	Affordable housing
Pantages Apartments	11	Leased	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	Leased	No	Affordable housing
Park Place	100	Leased	No	Assisted living
Park Place	36	Leased	No	Assisted living
Parker Apartments	8	Leased	No	Affordable housing
Parkview Services	23	Leased	No	Affordable housing for people with disabilities
Pat Williams Apartments	21	Leased	No	Permanent supportive housing
Patricia K. Apartments	12	Leased	No	Permanent supportive housing
Patrick Place	40	Leased	No	Permanent supportive housing
Pioneer Human Services	11	Leased	No	Service-enriched for homeless individuals
Plymouth on First Hill	77	Leased	No	Permanent supportive housing
Plymouth on Stewart	74	Leased	No	Permanent supportive housing
Plymouth Place	70	Leased	No	Permanent supportive housing
Rainier Vista	23	Leased	No	Affordable housing
Raven Terrace	50	Leased	No	Affordable housing
Ravenna Springs Properties	13	Leased	No	Affordable housing
Red Cedar	80	Leased	No	Affordable housing
Rise at Yancy	44	Leased	No	Permanent supportive housing
Rose of Lima House	30	Leased	No	Permanent supportive housing
Rose Street Apartments	4	Leased	No	Affordable housing
Salish Landing (fka Lam Bow)	51	Leased	No	Affordable housing
Samaki Commons	12	Leased	No	Affordable housing
Samaki Commons	8	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Sand Point Campus	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	Leased	No	Permanent supportive housing for families
Scattered Sites – Bitterlake portfolio	54	Leased	No	Affordable housing
Scattered Sites – Madison portfolio	17	Leased	No	Affordable housing
Scattered Sites – Northeast Seattle portfolio	38	Leased	No	Affordable housing
Scattered Sites – Northwest Seattle portfolio	47	Leased	No	Affordable housing
Scattered Sites – South Park portfolio	16	Leased	No	Affordable housing
Scattered Sites – South Seattle portfolio	10	Leased	No	Affordable housing
Scattered Sites – University District portfolio	5	Leased	No	Affordable housing
Scattered Sites – West Seattle portfolio	41	Leased	No	Affordable housing
Sea-Mar Family Housing	5	Leased	No	Service-enriched for homeless families (with at least one minor)
SHA - SFD special portfolio	1	Leased	No	Affordable housing
Simons Senior Housing Apartments	78	Leased	No	Permanent supportive housing
South Shore Court (fka Douglas Apartments)	9	Leased	No	Affordable housing
Spruce Street Apartments	10	Leased	No	Affordable housing
Starliter Apartments	6	Leased	No	Affordable housing
Stone Avenue Townhomes	4	Leased	No	Affordable housing
Stone Way Apartments	21	Leased	No	Affordable housing
Stone Way Apartments	14	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2024	RAD?	Description of project
Sylvia Odom's Place	64	Leased	No	Permanent supportive housing graduates
Tamarack Place	20	Leased	No	Affordable housing
Traugott Terrace	40	Leased	No	Service-enriched for homeless individuals in recovery
Tyree Scott Apartments	10	Leased	No	Affordable housing
Tyree Scott Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase I	17	Leased	No	Affordable housing
Views on Madison Phase I	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase II	7	Leased	No	Affordable housing
Villa Park	6	Leased	No	Affordable housing
Village Square II Apartments	31	Leased	No	Affordable housing
Vivian McLean Place Apartments	4	Leased	No	Affordable housing
Weller Apartments	49	Leased	No	Affordable housing
Westwood Heights East	22	Leased	No	Affordable housing
WSAH (fka Longfellow/Wisteria)	19	Leased	No	Affordable housing
Yesler Court	5	Leased	No	Affordable housing
YWCA Women's Residence	15	Leased	No	Permanent supportive housing for women
YWCA Women's Residence	38	Leased	No	Permanent supportive housing for women

Total planned existing project-based vouchers

4,762

Appendix B: Local asset management plan

I. Introduction

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

II. Framework for SHA’s local asset management program

A. Mission and Values

The City of Seattle established SHA under State of Washington enabling legislation in 1939. SHA provides affordable housing or rental assistance to over 38,000 low-income people (representing over 18,000 households), through units SHA owns and operates or for which SHA serves as the general partner of a limited partnership and as managing agent, and through rental assistance in the form of tenant-based, project-based and provider-based vouchers. SHA is also an active developer of low-income housing. SHA redevelops and rehabilitates communities and preserves existing assets. SHA operates according to the following mission and values:

Our mission

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

Our values

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

SHA owns and operates housing in neighborhoods throughout Seattle. These include the four large family communities of NewHolly and Rainier Vista in Southeast Seattle, High Point in West Seattle and Yesler in Central Seattle. In the past 23 years, SHA has undertaken redevelopment or rehabilitation of all four family communities, a new family community in Lake City and 23 of our public housing high-rise buildings, using mixed financing with low-income housing tax credit limited partnerships and/or ARRA funds. During 2023, SHA will be the general partner in 16 limited partnerships.

B. Overarching policy and cost objectives

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

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

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

C. Local Asset Management Program – Eight Guiding Principles

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

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

We recognize that varying funding sources carry different requirements for eligibilities, and rules for sustaining low-income housing units through operations and financing. It is SHA's job to present funding and administrative differences as seamlessly as possible to our residents and participants. Our goal is for low-income families to be able to navigate the housing choices and rental assistance programs SHA offers. It is also our job to design our housing operations to bridge differences among programs/fund sources, and to promote consolidated requirements. It is also incumbent on us to use our own and MTW authority to minimize administrative inefficiencies from differing rules. We seek common rules, where possible, to enhance cost effectiveness and 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. SHA's city and county wide partnership with supportive services and educational/training resources to create a comprehensive integrated housing + services program is vital to our success. SHA's LAMP is designed to create a cohesive whole of SHA housing programs. It is intentionally 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 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 and/or other timely financial reviews are conducted with the responsible property manager(s) and the area or housing program managers, with SHA's Asset Management Team and/or 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 and the Policy Office's interdepartmental team meetings provide forums for review of housing operations policies, practices, financial performance, capital requirements and assessment of best practices and performance among SHA, other housing authorities and other housing providers.

A key element of SHA's LAMP is the Asset Management Team (AM Team) in combination with the Budget Office and Policy Office's interdepartmental team meetings comprised of upper and property management staff from housing operations, asset management, property services, executive, legal, finance and budget, community services, communications and rental assistance. These interdisciplinary teams meet throughout the year and address:

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

time), how the property is doing in relation to budget and key reasons for deviations and property manager projections and/or concerns about the future.

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

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

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

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

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

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

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

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

- Most services are supported from public and private grants and many of these don't allow indirect cost charges as part of the pool of eligible expenses under the grant.
- SHA uses local funds from operating surpluses to augment community services funding from grants; these surpluses are derived from operations where indirect services have already been charged.
- SHA's community services are very diverse, from recreational activities for youth to employment programs to translation services. This diversity makes a common basis for allocating indirect services problematic.
- Most importantly, there is a uniform commitment on the part of housing and housing choice managers to see dollars for services to their tenants/participants maximized. There is unanimous agreement that these program dollars not only support the individuals served but serve to reduce property management costs they would experience from idle youth and tenants struggling on their own to get a job.

6. SHA will achieve administrative efficiencies, maintain a central job cost accounting system for capital assets and properly align responsibilities and liability by allocating capital assets/improvements to the property level only upon completion of capital projects.

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

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

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

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

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

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

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

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

A. Comprehensive Operations

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

Accordingly:

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

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

B. Project-Based Portfolio Management

We have reflected in our guiding principles above the centrality of project/property-based and program-based budgeting, management, reporting and accountability in our asset management program and our implementing practices. We also assign priority to our multi-disciplinary central Asset Management Team and the Policy Office's interdepartmental team in its role to constantly bring best practices, evaluations and follow-up to inform SHA's property management practices and policies. Please refer to the section above to review specific elements of our project-based accountability system.

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

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

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

C. Cost Allocation Approach

Classification of Costs

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

Cost Objectives

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

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

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

SHA Direct Costs

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

- | | |
|---|---|
| <ul style="list-style-type: none"> • 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 include, but are not limited to, | <ul style="list-style-type: none"> landscaping, pest control, and decorating and unit turnover • Operating subsidies paid to mixed income, mixed finance communities • Community Services department costs directly attributable to tenants' 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. |
|---|---|

SHA Indirect Costs

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

- | | |
|--|---|
| <ul style="list-style-type: none">• 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 | <ul style="list-style-type: none">• 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 |
|--|---|

SHA Indirect Service Fee – Base, Derivation and Allocation

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

Equitable Distribution Base

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

Derivation and Allocation

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

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

A per unit cost is calculated using the remaining net indirect costs divided by the number of units and the number of leased vouchers. For the 2023 budget the per unit per month (PUM) cost for housing units is \$69.59 and for leased vouchers is \$24.77.

Annual Review of Indirect Service Fee Charges

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

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

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

- SHA determined to implement an indirect service fee that is much more comprehensive than HUD's asset management system. HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Low-Income Public Housing (LIPH) property level. SHA's LAMP is much broader and includes local housing and other activities not found in traditional HUD programs. SHA's LAMP addresses the entire SHA operation.
- SHA has defined its cost objectives at a different level than HUD's asset management program. SHA has defined three cost objectives under the umbrella of the MTW program, which is consistent with the issuance of the CFDA number and with the current MTW Contract Agreement (expires 12.31.2028). 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
- 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: 2024 Indirect Services Fee Plan

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

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

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

Direct cost objectives		Housing						Rental assistance	Community services
FDS columns	MTW	Indirect services costs	AMPs	Other housing	Other business activities	LP component units	MF developments & home ownership	Other housing	Other business activities
Funds	Capital WIP unallocated costs IT capital projects 100 480	400	Various, including LIPH portion of LP CUs	104 122 127 137 193/216 352-354 357 591 750 754	190 194 195 198 199 450 470	16 LPs LIPH portion reported in AMPs	700 704-709 711-712 718-719 723-749 848	139 168	125 CS grants

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

Appendix B - Attachment 2: 2024 Indirect Cost Allocation Plan

Department	2024 Proposed expenses	All units	Hard units only
Executive total	3,321,370	3,321,370	
Asset Management	907,333		907,333
Finance	5,271,019	5,271,019	
Housing Operations	2,970,477		2,970,477
HCV	91,479	91,479	
HR: Allocated based on staff	3,892,474	1,418,869	2,473,604
Prior year inc./exp. reconciliation – expense			
Total	\$ 16,454,150	\$ 10,102,737	\$ 6,351,413
Percentage	100%	61%	39%
Less fixed revenues	(7,315,117)		
Remaining OH* to allocate PUM	\$ 9,139,033	\$ 5,611,305	\$ 3,527,729
Units		18,876	6,560
PUM cost		\$24.77	\$44.81
PUM cost to equal burden units			\$24.77
PUM fee to hard units			\$69.59

*OH = Overhead

Indirect revenue		2024 Estimate
Capital grant admin		1,690,000
MTW adjustment		2,900,000
10% of developer fee cash		284,976
LP management fees		1,614,536
Laundry fee revenue		75,605
Insurance dividend		500,000
City benefit reimbursement		0
Solid waste services		250,000
Total fixed revenues		\$ 7,315,117

Unit summary		Total
Housing units		6,560
Total vouchers	12,316	
Leased vouchers at 95.09% of utilization		11,634
Total Mod Rehab	163	
Divide by two for work equivalency		81.5
Total units		18,876

Indirect Services Fee by Community

Indirect services rates

Equal burden units	24.77
Hard units	69.59

Low Income Public Housing			
Development no.	Community name	Units	2024 Allocation
009	Jefferson Terrace	21	17,536
013	Olive Ridge	105	87,678
015	Bell Tower	120	100,203
017	Denny Terrace	220	183,706
023	Westwood Heights	130	108,554
031	Tri Court	87	72,647
037	Jackson Park Village	7	5,845
038	Cedarvale Village	24	21,041
041	Holly Court	66	55,112
050	Scattered Sites	484	404,153
086	High Rise Rehab Phase I	704	587,859
087	High Rise Rehab Phase II	690	576,169
088	High Rise Rehab Phase III	587	490,161
092	Seattle Senior Housing North	231	192,891
093	Seattle Senior Housing South	138	115,234
094	Seattle Senior Housing Central	246	205,417
095	Seattle Senior Housing City Funded	279	232,973
Total Low Income Public Housing		4,139	3,456,180
Other Housing Programs			
Development no.	Community name	Units	2024 Allocation
104	Seattle Senior Housing Other Units	66	55,112
122	Market Terrace	30	25,051
127	Bayview Tower	100	83,503
137	Ref 37	8	6,680
139	Rental Assistance	12,235	3,637,025
168	Mod Rehab	82	24,227
193	Local Housing Program	563	470,121
352	NewHolly II - Othello	96	80,163
353	NewHolly III - Desdemona	219	182,871
354	Rainier Vista I - Escallonia	184	153,645
357	High Point I North	344	287,250
591	Baldwin Apartments	15	12,525
733	High Point II South	256	213,767
750	New Acquisitions	329	274,724
754	Northgate Apartments	211	176,191
Total Other Housing Programs		14,737	5,682,854
Total Management Fee		18,876	9,139,033

Limited Partnership Units			
Development no.	Community name	Units	2024 Allocation
089	Rainier Vista II – Tamarack	83	65,616
090	Rainier Vista III – Northeast	118	95,318
091	Lake City Court	86	56,760
Total HOPE VI Limited Partnerships		543	413,934
Restricted Fee Units			
Development no.	Community name	Units	2024 Allocation
292	South Shore Court	44	23,573
738	Kebero Court	103	83,202
739	Leschi House	69	54,114
743	Raven Terrace	83	67,046
744	Hoa Mai Gardens	111	84,928
745	Red Cedar	119	85,823
746	NewHolly I - Holly Park	305	241,892
747	West Seattle Affordable Housing	204	160,767
748	Salish Landing	82	62,838
749	Hinoki	136	107,346
751	Sawara	114	80,712
753	Jefferson Terrace	201	156,515
848	SPACE- SS	228	188,085
Total Restricted Units		1,799	1,396,842
Total		2,086	1,614,536

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

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

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

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

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

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

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

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

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

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

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

Appendix C: Compliance documentation

The 2024 Annual MTW Plan includes the following signed documents. Links to blank forms are included for reference where applicable.

SHA Board of Commissioners resolution approving the 2024 Moving to Work Annual Plan for the Seattle Housing Authority (Pending)

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

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

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