



Seattle Housing Authority **Moving to Work** 2024 Annual Report



Submitted March 31, 2025

Seattle Housing Authority Leadership

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For more information on Seattle Housing Authority's 2024 Annual Report or the agency's participation in Moving to Work more broadly, please contact mtw@seattlehousing.org or visit <https://www.seattlehousing.org/about-us/reports/moving-to-work-reports>.

On the cover: A young person celebrates the grand opening of SHA's newest building, Sawara Apartments, in the Yesler community.

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(I) Introduction

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

In 2024, SHA provided affordable housing to more than 37,000 people¹ through a variety of opportunities including SHA owned/managed units, subsidized collaborative units operated by non-profit partners and tenant-based vouchers that provide subsidy to participants to rent in the private market. Nearly 30% of SHA's participants were children and 35% of participants were seniors or adults with disabilities. About 84% of SHA households had annual incomes below 30% area median income and the annual median household income was \$14,892.

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

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

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

A. Overview of short-term and long-term MTW goals and objectives

SHA's goals and objectives for 2024 align with the goals of the MTW Demonstration. MTW agencies are committed to three common goals: financial and administrative efficiency, self-sufficiency for families and neighborhood choice. In addition to these goals, the work that MTW agencies have been doing for the past 25 years is closely aligned the nation's values, including investing in affordable housing, reducing regulatory burdens, increasing opportunities for families with children and promoting economic self-sufficiency. Through the lens of these goals and using the flexibility authorized under MTW, SHA continuously reviews its practices and policies to best maximize its resources and provide affordable housing to low-income people in Seattle.

Long-term goals and objectives

MTW is a critical tool in SHA's ability to advance its mission. 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. In pursuit of that goal, SHA supported federal legislation, championed by Senator Patty Murray of Washington State, in 2024 to preserve and extend the MTW agreements for the initial 39 MTW agencies. In doing so, SHA helped secure a ten-year extension for the initial 39 MTW agencies, extending the program's expiration date from 2028 to 2038.

¹ Data as of December 31, 2024.

Short-term goals and objectives

In 2024, SHA began work on improving the administrative (time and effort) burden of income and rent determination policies on tenants and staff. The goal is to develop a comprehensive set of recommendations for improvements. 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. Work is expected to wrap up in 2025, with recommendations going to SHA's leadership and Board of Commissioners.

Two major construction projects wrapped up in 2024 as well:

1. Phase two of the Jefferson Terrace mixed-finance rehabilitation was completed, with all units now available for lease-up. Many residents who were relocated during the rehab returned; due to attrition there are still units available for new tenants. All units in the building are Low Income Housing Tax Credit (LIHTC) with PBVs.
2. Sawara, a building in the Choice Neighborhoods Initiative Yesler Terrace Development, opened in August. It is the sixth new residential building at Yesler, a neighborhood near downtown Seattle redeveloped by SHA into a vibrant, new mixed-income community. The building name honors Japanese culture in the neighborhood and can refer to a cypress tree or a type of fish. The building features 114 apartments, including many 2-, 3- and 4-bedroom family units. Sixty-nine units are project-based, and the rest are straight tax credits.

(II) General operating information

A. Housing stock information

i. Actual new project-based vouchers

Property name	Number of vouchers newly project-based		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Beacon Pacific Village	0	31	Leased/ Issued	No	Beacon Pacific Village is a mixed-use community development managed by the Seattle Chinatown International District Preservation and Development Authority (SCIDpda). It will be completed in two phases. Phase 1 includes 160 units of affordable family sized housing.
Hobson Place II	0	26	Leased/ Issued	No	Hobson Place is a supportive housing building featuring 177 studio units across two phases. 92 units are in the second phase of this 2-phase development. This building is operated by Downtown Emergency Service Center (DESC), which also provides tenants with management and supportive services.
John Fox Place	0	26	Leased/ Issued	No	John Fox Place is operated by the Low Income Housing Institute (LIHI). It contains a total of 104 units made up of studios, 1-, 2-, and 3-bedroom affordable units.
North Star	0	42	Leased/ Issued	No	The North Star is a permanent supportive housing building operated by DESC. It features 100 studio units with supportive services and indoor & outdoor community spaces.
Sawara Apartments	50	69	Leased/ Issued	No	Sawara Apartments is part of the Yesler Development. It is comprised of 114 units of affordable housing, including 69 units with PBV subsidy. Approximately half the units are family-size units. Sawara provides tenants with space for residential amenities, enclosed common area, common exterior play area and Property Management offices are on-site.

50	194
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Planned/actual total vouchers newly project-based

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

Beacon Pacific Village (+31): This contract was newly awarded in 2024 (1 of 4 new awards).
Hobson Place II (+26): This contract was newly awarded in 2024 (1 of 4 new awards).
John Fox Place (+26): This contract was newly awarded in 2024 (1 of 4 new awards).
North Star (+42): This contract was newly awarded in 2024 (1 of 4 new awards).
Sawara Apartments (+19): SHA project-based 19 additional units within this new project than predicted at the time the 2024 Plan was submitted.

ii. Actual existing project-based vouchers

SHA's planned existing project-based vouchers for 2024 was **4,961**; the actual number of existing project-based vouchers at the end of 2024 was **4,970**.

The complete list of actual existing PBV contracts includes nearly **210 properties**; details can be found in *Appendix B: Actual existing project-based vouchers* (beginning on p. 59).

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

Alderbrook Place (formerly CPC Alderbrook) (+2): Contract is closing at request of the provider. Units are being removed as tenants move out. There are still two units left in the contract, which was expected to have fully closed out by year-end 2024.
Bayview Tower (+11): SHA is project-basing the vouchers in this building as families with tenant-based vouchers move out.
Golden Sunset (+11): SHA is project-basing the vouchers in this building as families with tenant-based vouchers move out.
Humphrey House (+6): SHA awarded six additional PBVs to this contract to replace VASH PBVs as families move out.
Market Terrace (+7): This contract was mistakenly left off the list of Planned Existing Project-Based Vouchers in the 2024 Plan.
Nhon's House (-1): One unit removed from contract at request of provider.
Opportunity Place (-1): One unit removed for use by provider's staff.
Parkview Services (-1): One unit removed from contract at request of provider.

Pioneer Human Services (-11): Contract was closed at request of provider.

Plymouth on Stewart (+3): SHA awarded three additional PBVs to this contract to replace VASH PBVs as families move out.

Ravenna Springs Properties (+1): SHA awarded one additional PBV to this contract.

Simon's Senior Apartments (+3): SHA awarded three additional PBVs to this contract to replace VASH PBVs as families move out.

Special Purpose Vouchers (+246): An additional mix of VASH and Mainstream vouchers were added to the count of SHA's Planned Existing Project-Based Voucher count due to updated instructions in the Form HUD-50900 (exp. 2027). Because these were all existing contracts in 2024, they have been added to the count of Actual Existing Vouchers in Appendix A.

iii. Actual other changes to MTW housing stock in 2024

Jackson Park Village: Disposition of this Public Housing Development (WA001000037) was approved in early 2024 and the majority of tenant relocation was completed in advance of redeveloping the site.

Sawara (+114 LIHTC units): Sawara, the penultimate building in SHA's Choice Neighborhoods Initiative redevelopment of Yesler Terrace, came online, with 114 units comprising 69 Project-Based Vouchers and 45 straight Tax Credit units (including one Common Area Unit).

South Park Manor (+27 LIPH units): SHA introduced Low Income Public Housing subsidy into the previously unsubsidized South Park Manor, part of the Seattle Senior Housing Program. Subsidy began 04.01.2024 under the new HUD Development WA001000097.

Verse Seattle (+98 units): In May, SHA acquired the Verse Seattle apartments, implementing a Use Agreement to preserve the buildings' affordability by limiting occupancy to 80% of Area Median Income..

iv. General description of all actual capital expenditures during 2024

In 2024, SHA engaged in the following capital expenditures:

Appliances: SHA replaced appliances at NewHolly Phase II (WA001000076) and NewHolly Phase III (WA001000079).

Building Exterior: SHA performed exterior recladding at South Park Manor (WA001000097). SHA performed exterior upgrades, including siding repair, at various Scattered Sites (WA001000050).

Common Area Upgrades: SHA made common area upgrades at Columbia Place (WA001000093).

Electrical: SHA upgraded lighting at Gideon-Mathews Gardens (WA01000094), Fremont Place (WA01000092), Michaelson Manor (WA001000094), South Park Manor

(WA001000097), and Scattered Sites properties (WA001000050). SHA also conducted a solar panel study at Center Park (WA001000010).

Elevator: SHA upgraded the elevator at Westwood Heights (WA001000023). SHA repaired elevators at University House (WA001000088) and Willis House (WA001000095). SHA also replaced the elevator sheave and phone line connection at University House (WA001000088).

HVAC: SHA installed heat pumps to the community rooms of Tri-Court (WA001000031), Olive Ridge (WA001000013), and Denny Terrace (WA001000017). SHA installed ductless heat pumps at South Park Manor (WA001000097) and Scattered Sites (WA001000050). SHA also replaced boilers at NewHolly Phase II (WA001000076).

Interior Upgrades: SHA upgraded the interior of four units at Cedarvale Village (WA001000038). SHA replaced cabinets and countertops and upgraded interiors at NewHolly Phase III (WA001000079). SHA rehabbed a unit at both 104th Street Townhomes (N/A) and Spruce Street Townhomes (N/A), one home at Ravenna Springs (N/A), and various Scattered Sites (WA001000050). SHA also upgraded bathtubs at Martin Luther King Jr Apartments (N/A).

Painting: SHA painted the interiors of Sunrise Manor (WA001000092), Ravenna School Apartments (N/A), Denny Terrace (WA001000017), and Tri-Court (WA001000031). SHA painted the exteriors of several Scattered Sites (WA001000050).

Planning: SHA worked with a consultant to investigate, design, and get permits for exterior upgrades at Fremont Place (WA001000092), Fort Lawton Place (WA001000094), and Gideon-Mathews Gardens (WA001000094).

Roofing: SHA replaced the roof at South Park Manor (WA001000097) and various Scattered Sites (WA001000050).

Security: SHA demolished the horizontal lifeline at the Operations Support Center (N/A).

Site Work: SHA repaired fencing at 104th Street Townhomes (N/A) and repaired the garbage station pad at Main Street Apartments (N/A). SHA also installed mailboxes at Nelson Manor (WA001000095), Gideon-Mathews Gardens (WA001000094), Pinehurst Court (WA001000092), Carroll Terrace (WA001000094), Reunion House (WA001000095), Primeau Place (WA001000094), Phinney Terrace (WA001000092), Schwabacher House (WA001000092), Pleasant Valley Plaza (WA001000094), Olmsted Manor (WA001000095), Island View (WA001000093), Fremont Place (WA001000092) and Columbia Place (WA001000093).

B. Leasing information

i. Actual number of households served

Number of households served through:	Number of unit months occupied/leased		Number of households served	
	Planned	Actual	Planned	Actual
MTW Public Housing units leased²	60,120	59,859	5,010	5,171
MTW Housing Choice Vouchers utilized³	118,944	137,796	9,912	11,483
Local, non-traditional: Tenant-based⁴	360	1,157	30	92
Local, non-traditional: property-based⁵	16,824	8,100	1,402	675
Local, non-traditional: Homeownership	0	0	0	0
Planned/actual totals	196,068	206,912	16,354	17,421

Please describe differences between the planned and actual households served.

Public housing households: Leasing was delayed at buildings across SHA's portfolio due to fire and rehabilitation. See "ii. Discussion of any actual issues/solutions related to leasing" for additional details.

Housing Choice Voucher households: SHA counted project-based units in Yesler Terrace in the LNT-Property-Based category in the MTW Plan; however, following the publication of the "[Moving to Work Local, Non-Traditional FAQs](#)" on September 13, 2024, these units are now being counted as MTW Housing Choice Vouchers. After opening the new Voucher Wait List in 2024, leasing was more successful and lease-up happened more quickly than anticipated.

Local, non-traditional tenant-based households: The Respite Program at Jefferson Terrace came back online in 2024 and is now in SHA's Local, Non-Traditional tenant-based portfolio.

Local, non-traditional property-based households: Per the above, project-based units were counted in the LNT category in the MTW Plan and were moved to the HCV category in this Report.

² MTW Public Housing unit months leased/households also includes 77 units in MTW Neighborhood Services-Occupied status which are used for housing Local, Non-Traditional (LNT) households. These units are excluded in the table below to avoid double-counting. Using a different service model, these units served 95 unique households.

³ Housing Choice Voucher unit months leased/households includes all voucher types included in HUD's Substantially the Same calculation (MTW, Mainstream, Family Unification Program (FUP) pre-2008).

⁴ Beginning in 2023, households in SHA's respite program at Jefferson Terrace are counted as LNT: Tenant-based due to a change in the financing of the units the program utilizes.

⁵ Local, Non-Traditional: Property-based unit months leased/households includes households reported under MTW Activity #20 in the table below. It excludes households reported in MTW Activity #8, as those units are accounted for in MTW public housing above (per footnote 3).

Local, non-traditional category	MTW activity name/number	Number of unit months occupied/leased		Number of households to be served	
		Planned	Actual	Planned	Actual
Tenant-based	MTW Activity #8: Special purpose housing use	360	1157	30	92
Property-based	MTW Activity #20: Local, non-traditional affordable housing strategies	16,824	8,100	1,402	675
Homeownership	N/A	0	0	0	0

Households receiving local, non-traditional services only	Average number of households per month	Total number of households in 2024
N/A	0	0

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

Housing program	Description of actual leasing issues and solutions
MTW public housing	<p>Several buildings experienced leasing issues that impacted SHA's total number of households served.</p> <ol style="list-style-type: none"> 1. Jefferson Terrace: Waitlist numbers for the newly refurbished building were lower than expected. SHA has a lease-up team working on filling the vacancies. 2. Bell Tower: Many units remain offline as they are rehabbed due to a fire in 2023. SHA is working to complete repair work on these units as quickly as possible. 3. Jackson Park Village: All units were vacated during 2024 for a planned rehabilitation. The property will remain offline until construction is completed, estimated 2026.
MTW Housing Choice Voucher (SHA managed)	SHA's HCV portfolio did not experience issues related to leasing in 2024.
MTW Housing Choice Voucher (partner managed)	<p>In 2024, two main issues slowed leasing in partner-managed project-based voucher units.</p> <ol style="list-style-type: none"> 1. Coordinated Entry: The referral system for individuals experiencing homelessness was slower to lease due to difficulty with referrals not having documents ready to process. Providers will be making an effort to better collaborate with the King County Regional Homelessness Authority to prepare residents for leasing. 2. Staff turnover: Frequent staff turnover at the partner agencies means that new staff do not have the familiarity with the application processes and compliance rules. SHA is recommending that partners put additional emphasis on training.

Local, Non-Traditional	SHA's Local, Non-Traditional portfolio did not experience issues related to leasing in 2024.
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iii. Unique households served

Housing program	Unique households served
Agency Units	677
Respite Program	382
Total	1,059

Agency units are units owned by SHA and managed by non-profit organizations: First Place, Muslim Housing Services, Solid Ground, YWCA locations East Cherry and Willow. This is authorized under Activity 8: Special purpose housing. The medical respite program is in partnership with local hospitals to serve people who are homeless and in need of continued care after hospitalization. This program is located at Jefferson Terrace. For both programs, year-end counts are submitted to SHA spring of the following year.

C. Waiting list information

i. Actual waiting list information

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Was the waiting list opened during 2024?
MTW public housing	Site-based	6,104	Open	No
MTW Housing Choice Voucher (Tenant-based)	Community-wide	24,881	Open	Yes
MTW Housing Choice Voucher (Project-based)	Site-based	4,300 ⁶	Partially open	No
Local, non-traditional	Site-based	0	Closed ⁷	No

⁶ Many PBV units are managed by partners, who fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system, which maintains a central waitlist for permanent supportive housing units. Because of this, the number of households on the waitlist for these units is an estimate based on previous years' totals. Approximately 80 programs use these referrals.

⁷ Subsidized LNT unit (project-based) waitlists for household served under MTW Activity 20 were combined with Public Housing waitlists in 2019 using our MTW authority in *Activity 15: Combined program management*. Agencies housing participants through Activity 8 manage their own admissions.

Please describe any duplication of applicants across waiting lists.

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

ii. Actual changes to waiting list in 2024

Waiting list name	Description of actual changes to waiting list
MTW public housing	No changes.
MTW Housing Choice Voucher (tenant-based)	SHA opened its HCV tenant-based voucher list. The list is continuously open, and tenants are selected randomly from all waiting list applicants.
MTW Housing Choice Voucher (project-based)	No changes.
Local, non-traditional	No changes.

D. Information on statutory objectives and requirements

i. 75% of families assisted are very low income⁸

Income level	Number of local, non-traditional households admitted in 2024
50-80% area median income	12
30-49% area median income	61
Below 30% area median income	82
Total local, non-traditional households admitted	156

⁸ SHA does not include counts of newly admitted participants to the medical respite program at Jefferson Terrace because the nature of the program (serving individuals pending hospital discharge who would otherwise be street-homeless).

ii. Maintain comparable mix

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

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

Since 1999, SHA has done significant asset repositioning and made numerous non-MTW policy changes (such as occupancy standards). In addition, the demographics and availability of other housing resources in the Seattle community has changed. In 2011, SHA added 894 units from the Seattle Senior Housing Portfolio. Using average occupancy for the most recent three years, the baseline was adjusted to show an increase of 785 one-person households and 79 two-person households.

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

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

Family size	Mix of family sizes served (in 2024)			
	Baseline mix percentage	Number of households served in 2024	Percentage of households served in 2024	Percentage change from 1999 to 2024
1 person	51%	10,612	62%	+21%
2 person	19%	2,748	16%	-16%
3 person	13%	1,375	8%	-39%
4 person	9%	1,001	6%	-35%
5 person	4%	615	4%	-11%
6+ person	4%	853	5%	+24%
Total	100%	17,204	100%	

Please describe the justification for any variances of more than 5% between 2024 and 1999.

Since 1998, SHA has undertaken significant asset repositioning and significantly increased the number of HCVs under MTW. While there is not a one-for-one relationship between unit size and household size, the changes in household size served largely reflect the changes in public housing unit sizes in the past 20+ years. SHA’s tenant-based voucher program typically does not consider household size when selecting households from the voucher list

and therefore the change in the mix is subject to changes outside of SHA's control, such as demographic changes in the broader community. In addition, the allocation of PBVs to support service-enriched housing locally has increased the number of single-adult households, due to a community-driven focus on prioritizing currently homeless households.

iii. Number of households transitioned to self-sufficiency in 2024

MTW activity name/number	Number of households transitioned to self-sufficiency	SHA local definition of self-sufficiency
MTW activity #2: Family self-sufficiency program	245	Number of JobLink participants whose primary source of income is wages
MTW activity #2: Family self-sufficiency program	5	Number of JobLink participants who transitioned to unsubsidized housing
MTW activity #8: Special purpose housing use	102	Number of households that transition to unsubsidized housing (not including medical respite)
MTW activity #10: Local rent policy	1,226	Number of households in properties with absolute minimum rent that have primary source of income from wages
MTW activity #13: Homeownership and graduation from subsidy	29	Number of households who transitioned to unsubsidized housing due to homeownership and graduation from subsidy strategies.

5

Households duplicated across MTW activities

1,602

Total households transitioned to self sufficiency

(III) Proposed MTW activities

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

(IV) Approved MTW activities

Introduction

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

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

In accordance with the required HUD format, activities are organized in sections based on whether they are implemented (active), not yet implemented, on hold or closed out. Some strategies within an activity may be inactive or closed out and are indicated as such under their appropriate heading.

To date, HUD has approved 22 MTW Activities, which are:

<u>Implemented (active) MTW activities</u>	
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
<u>Not yet implemented activities</u>	
21.	Self-sufficiency assessment and planning
<u>Activities on hold</u>	
4.	Investment policies
<u>Closed out activities</u>	
6.	MTW Block Grant and fungibility

7. Procurement
14. Related nonprofits
16. Local asset management program
17. Performance standards

In the following pages, we provide a description of these MTW activities that have been previously approved and report on outcomes for 2024.

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

Emergency response and recovery

In SHA’s approved 2021 MTW Plan, the agency established an emergency response and recovery protocol. In the event that a government body with authority over SHA’s jurisdiction (e.g., City of Seattle, King County, State of Washington, the federal government), SHA’s Board of Commissioners and/or SHA’s Executive Director (as authorized by the Board of Commissioners) declares a state of emergency, SHA may utilize state of emergency and recovery flexibilities outlined in its MTW plan during the state of emergency and subsequent recovery. The state of emergency declaration may last until the emergency has been deemed to end by the declaring body or the declaration expires. The recovery period may last up to 18 months following the state of emergency, unless an extension is necessary due to conditions that preclude staff and residents from undertaking regular operations.

A. Implemented activities

MTW Activity #1: Development simplification

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated ⁹
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% of Area Median Income.	2018 MTW Plan	Not yet implemented	2019

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

⁹ 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.

Actual significant changes

None.

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.

SHA applies Strategies 2.A.03, 2.A.04, 2.A.06 and 2.A.07 to SPVs.

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

Strategy	Description	First identified	Current status	Year(s) updated
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
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% of FSS enrollments may be selected by local preferences.	2007 MTW Plan	Activated in 2018	2016

Impact

FSS is integrated within SHA's JobLink program which connects residents to employment, education and resources through one-on-one coaching support. The program helps residents build assets, develop job preparation and interview skills, teaches financial planning and literacy skills, supports residents to start small businesses, connects residents with resources in the community such as childcare and transportation and helps residents sign up for college or vocational training, apply for jobs or explore buying a home.

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual 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.

SHA applies Strategies 3.A.01, 3.A.03, 3.H.01 and 3.H.04 to SPVs.

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual 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.

SHA applies Strategy 5.H.01 to SPVs.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
5.A.01	Self-sufficiency requirement: All households receiving subsidy from SHA (public housing or voucher) in HOPE VI communities must participate in self-sufficiency activities.	1999 MTW Plan	Activated in 1999 Inactivated in 2021	2005 2005-R 2021-R
Voucher strategies				
5.H.01 (Recategorized from 9.H.06 in 2021)	HAP contracts: SHA may modify the HAP contract and Tenancy Addendum.	2000 MTW Plan	Activated in 2000	2000-R 2021 2022
Public housing strategies				
5.P.01	Local lease: SHA may implement its own lease, incorporating industry best practices.	2001 MTW Plan	Activated in 2011	2004 2005 2005-R 2009 2010 2011

Strategy	Description	First identified	Status	Year(s) updated
5.P.02	Grievance procedures: Modify grievance policies to require tenants to remedy lease violations and be up to date in their rent payments before granting a grievance hearing for proposed tenancy terminations.	2008 MTW Plan	Not yet implemented	None
5.P.03	Lease term for public housing units: SHA may offer lease renewals for six months or month-to-month time periods.	2009 MTW Plan	Activated in 2009	2012
5.P.04	Property-specific pet policies: SHA may establish pet policies, which may include the continuation or establishment of pet-free communities or limits on the types of pets allowed, on a building-by-building basis.	2011 MTW Plan	Activated in 2011	None
5.P.05	Leasing incentives: SHA may offer lease incentives to promote the leasing of a public housing unit	2017 MTW Plan	Activated in 2018	None

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual 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 activity SHA allows partner agencies to use residential units both for service-enriched transitional/short-term housing and for office space for community activities and service delivery. The ability to designate public housing units for specific purposes and populations facilitates this work, by allowing units to target populations with specific service and housing needs or specific purposes.

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual significant changes

None.

MTW Activity #9: Project-based program

Status

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

Description

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

SHA applies Strategies 9.H.04, 9.H.05, 9.H.07, 9.H.08, 9.H.09, 9.H.10, 9.H.12, 9.H.13, 9.H.14 and 9.H.17 to SPVs.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
9.H.01	Cost-benefit inspection approach: Allows SHA to establish local inspection protocol, including self-certification that inspection standards are met at time of move in for mid-year turnovers	1999 MTW Plan	Activated in 2004 Inactivated in 2021 (Superseded by 3.A.01 & 03)	2020 2021
9.H.02	Assets in rent calculation: Only calculate income on assets declared as valuing \$5,000 or more.	2000 MTW Plan	Activated in 2005 Inactivated in 2010 (Superseded by 10.H.12)	None
9.H.03	Choice offered at beginning (no exit vouchers): Housing choice is offered at the beginning of the project-based admissions process (by nature of site-specific waiting lists); exit vouchers are not offered.	2000 MTW Plan	Activated in 2000	2005
9.H.04	Contract term: Project-based commitments renewable up to 40 years.	2000 MTW Plan	Activated in 2000	None
9.H.05	Eligible unit types: Modify the types of housing accepted under a project-based contract - allows shared housing and transitional housing.	2000 MTW Plan	Activated in 2002	None
9.H.06	Recategorized as 5.H.01 (2021)			
9.H.07	Non-competitive allocation of assistance: Allocate project-based subsidy non-competitively to SHA controlled units, including non-contiguous project-based units within a portfolio.	2000 MTW Plan	Activated in 2000	2001 2005-R 2018
9.H.08	Owners may conduct new and turnover inspections: SHA may allow project-based owners to conduct their own new construction/rehab inspections and to complete unit turnover inspections	2000 MTW Plan	Activated in 2005	None
9.H.09	Percent of vouchers that may be project-based: Raise the percentage of vouchers that may be project-based above HUD limits, including exclusion of replacement vouchers and calculation based on authorized number of vouchers.	2000 MTW Plan	Activated in 2000	2008 2008-R 2011 2016
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	2000 MTW Plan	Activated in 2000	2011

Strategy	Description	First identified	Status	Year(s) updated
	than 30% of their adjusted income for rent and utilities.		Inactivated in 2011	
9.H.12	Streamlined admissions: SHA may streamline and centralize applications and waiting list processes for project-based HCV units.	2000 MTW Plan	Activated in 2000	2010-R 2017
9.H.13	Competitive allocation process: Commit vouchers to the City's competitive process for housing funding.	2004 MTW Plan	Activated in 2005 Inactivated in 2011	2011
9.H.14	Payment standards for SHA units: Allows higher than Voucher Payment Standard for SHA-operated project-based units if needed to support the project budget (while still taking into account rent reasonableness).	2004 MTW Plan	Activated in 2004	2005-R
9.H.15	Subsidy cap in replacement units: Cap subsidy at levels affordable to households at 30% AMI in project-based HOPE VI replacement units where SHA also contributed capital to write-down the unit's affordability to that level.	2004 MTW Plan	Activated in 2004 Inactivated in 2011	2011
9.H.16	Admissions-admit people with felony records under certain conditions: Allows for the admission into Project-based Voucher units of people with Class B and Class C felonies on their records subject to time-limited sex offender registration requirements who do not, in the opinion of the owner of the subsidized units, constitute a threat to others.	2005 MTW Plan	Activated in 2005	2005-R
9.H.17	Program-based vouchers: Allocate floating voucher subsidy to a defined group of units or properties.	2003 MTW Plan	Activated in 2004	2003-R
9.H.18	Provider-based vouchers: Provide vouchers to selected agencies to couple with intensive supportive services. The agency master leases units and subleases to tenants.	2007 MTW Plan	Activated in 2007	None
9.H.19	Streamlined admissions and recertifications: SHA may streamline admissions and recertification processes for provider-based and project-based programs.	2009 MTW Plan	Not yet implemented	None
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

Strategy	Description	First identified	Status	Year(s) updated
9.H.21 (Recategorized from 9.H.20 in 2013)	COPES housing assistance payment calculations: Count as zero income for residents who are living in project-based units at assisted living properties where Medicaid payments are made on their behalf through the COPES system	2012 MTW Plan	Activated prior to MTW implementation	2013

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

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

SHA applies Strategies 10.A.01, 10.A.02, 10.A.04, 10.A.05, 10.H.01, 10.H.02, 10.H.03, 10.H.04, 10.H.06, 10.H.09, 10.H.10, 10.H.14 and 10.H.15 to SPVs.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
10.A.01	Streamlined income verification: SHA may adopt local rules regarding the length of time income verification is considered valid and a local verification hierarchy.	2014 MTW Plan	Activated in 2014	2020 2021 2022
10.A.02 (Recategorized from 10.P.23 in 2021)	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2014 MTW Plan	Activated in 2015	2018 2019 2021
10.A.03	Mixed-status household subsidy calculation: SHA may prorate housing subsidy for mixed-status households as a per person or per household standard amount rather than using HUD's standard percentage.	2023 MTW Plan	Closed in 2024	2024-R
10.A.04 (Recategorized from 10.H.13 in 2023)	Streamlined medical deduction: SHA will allow self-certification of medical expenses.	2010 MTW Plan	Activated in 2011	2015 2023-R
10.A.05 (Combined 10.H.12 and 10.P.19 in 2023)	Asset strategy: 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-R 2024
Voucher strategies				
10.H.01	Rent burden-include exempt income: Exempt income included for purposes of determining affordability of a unit in relation to 40% of household income.	2000 MTW Plan	Activated in 2005	2005 2014
10.H.02	Rent cap-use gross income: Rent burden calculated on 40% of Gross Income, up from HUD's standard 30% of Adjusted Income.	2000 MTW Plan	Activated in 2005	2003 2005
10.H.03	Rent reasonableness at SHA-owned units: Allows SHA staff to perform rent reasonable determination for SHA-owned units.	2000 MTW Plan	Activated in 2000	2006 2017
10.H.04	Payment standard: SHA may develop local voucher payment standards, including supplements for opportunity areas and different standards for market-rate and affordable housing and shared housing.	2003 MTW Plan	Activated in 2003	2003 2006 2008 2011 2012 2015 2016 2017 2018 2019 2020
10.H.05	Absolute minimum rent: The minimum rent for all residents will be	2003 MTW Plan	Not yet implemented	2005

Strategy	Description	First identified	Current status	Year(s) updated
	established annually by SHA. No rent will be reduced below the minimum rent amount by a utility allowance.			
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.05 in 2023-R.			
10.H.13	Recategorized as 10.A.04.			
10.H.14	Simplified utility allowance schedule: HCV participants' rent will be adjusted for a Utility Estimate based on the number of bedrooms (defined as the lower of voucher size or actual unit size) and tenant responsibility for payment of energy, heat, and sewer/water under their lease, with a proration for energy-efficient units.	2011 MTW Plan	Activated in 2011	None
10.H.15	Disregard of student financial aid as income: SHA may disregard student financial aid as income.	2019 MTW Plan	Activated in 2019	2020
Public housing strategies				
10.P.01	Absolute minimum rent: Tenants pay a minimum rent (\$50 or more) even if utility allowance would normally result in a lower rental payment or reimbursement.	2000 MTW Plan	Activated in 2001	2005

Strategy	Description	First identified	Current status	Year(s) updated
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
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

Strategy	Description	First identified	Current status	Year(s) updated
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.05 in 2023-R.			
10.P.20	Simplified Utility Assistance Payment for HOPE VI communities: HOPE VI participants receive a maximum level of consumption rather than reduction, and incentive for conservation. Annual adjustments are made at the next regularly scheduled annual review or update.	2013 MTW Plan	Activated in 2013	2014
10.P.21	Market rate rent: SHA may charge market rate rent as a penalty for noncompliance with the annual review process.	2005 MTW Plan	Activated in 2005	2015
10.P.22	Delay in rent increase for newly employed households: SHA may allow a longer notification period before rent increase if the increase is due to the resident becoming employed after at least six months of unemployment and is self-reported by the resident in a timely manner.	2014 MTW Report	Activated in 2014	2014
10.P.23	Self-employment expenses: Households may declare employment expenses up to a set threshold of	2015 MTW Plan	Activated in 2015	2018 2019

Strategy	Description	First identified	Current status	Year(s) updated
	gross income without further validation of deductions.			
Emergency response & recovery				
10.EM.01	States of emergency: certification deferrals: SHA may defer regular rent reviews for all household types during states of emergency and recovery until the agency has recovered from the crisis, as defined in the Introduction to Section IV. Residents retain applicable opportunities to have an interim review.	2020 MTW Plan	Activated in 2020	None

Impact

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

This activity is **on schedule**.

Updates

SHA received no hardship request related to absolute minimum rent in 2024.

Actual non-significant changes

SHA is combined 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.05: Asset income threshold* (previously mislabeled as Strategy 10.A.04).

SHA closed out *Strategy 10.A.03: Mixed-status household subsidy calculation* due to updated guidance from HUD.

Actual significant changes

None.

MTW Activity #11: Resource conservation

Status

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

Description

SHA's resource conservation strategies take advantage of the agency's existing relationships with the City of Seattle and local utility providers, which continuously identify opportunities to increase resource conservation and reduce costs, rather than conducting a HUD-prescribed

energy audit every five years. Conservation strategies have already achieved significant energy and cost savings to the agency, including conversion to more efficient toilets and electrical upgrades.

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual 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. Approved strategies in this activity are as below.

SHA applies Strategy 12.A.02 to SPVs.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
12.A.01	Local preferences: SHA may establish local preferences for federal housing programs.	2002 MTW Plan	Activated in 2002 Inactivated in 2011	None
12.A.02 (Recategorized from 12.H.06 in 2021)	Streamlined eligibility verification: Streamline eligibility verification standards and processes, including allowing income verifications to be valid for up to 180 days.	2009 MTW Plan	Activated in 2013	2020 2021
Voucher strategies				
12.H.01	Recategorized as 9.H.20			
12.H.02	Voucher distribution through service provider agencies: Up to 30% of SHA's tenant-based vouchers may be made available to local nonprofits, transitional housing providers, and divisions of local government that provide direct services for use by their clients without regard to their client's position on SHA's waiting list.	2000 MTW Plan	Activated in 2002	2001 2003
12.H.03	Special issuance vouchers: Establish a "special issuance" category of vouchers to address circumstances where timely issuance of vouchers can prevent homelessness or rent burden.	2003 MTW Plan	Activated in 2003	2017
12.H.04	Admit applicants owing SHA money: Provide voucher assistance to households owing SHA money from prior tenancy under specific circumstances, for example if they enter into a repayment agreement.	2008 MTW Plan	Activated in 2008 Inactivated in 2010-R	2008-R
12.H.05	Limit eligibility for applicants in subsidized housing: Implement limits or conditions for tenants living in subsidized housing to participate in the HCV program. For example, before issuing a Public Housing resident a Voucher, they must fulfill the initial term of their public housing lease.	2008 MTW Plan	Activated in 2011	None
12.H.06	Recategorized as 12.A.02 (2021)			
Public housing strategies				
12.P.01	Site-based waiting lists: Applicants can choose from several site-specific and/or next available waiting lists.	1999 MTW Plan	Activated in 1999 Inactivated in 2011	None

Strategy	Description	First identified	Status	Year(s) updated
12.P.02	Partners maintain own waiting lists: Allow partners to maintain waiting lists for partner-owned and/or operated units (traditional LIPH units; service provider units, etc.) and use own eligibility and suitability criteria (including no waiting list).	2000 MTW Plan	Activated in 2000	None
12.P.03	Expedited waiting list: Allow applicants referred by selected partners (primarily transitional housing providers) to receive expedited processing and receive the "next available unit."	2004 MTW Plan	Activated in 2004 Inactivated in 2018	2005-R
12.P.04	No waiting list: Allows for filling units without a waiting list.	2008 MTW Plan	Not yet implemented	None
12.P.05	Eligibility criteria: Unique eligibility criteria for specific units or properties, such as service enriched units.	2008 MTW Plan	Not yet implemented	None
12.P.06	Seattle Senior Housing Program (SSHP) waiting list policy: SHA will not distinguish between senior and non-senior disabled households in filling vacancies in the SSHP portfolio based on bedroom size. The SSHP program will maintain a 90% senior, 10% non-senior disabled ratio at the AMP level.	2013 MTW Plan	Activated in 2013	None

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
13.A.01	Down payment assistance: Allocate MTW Block Grant funds to offer a local down payment assistance program.	2004 MTW Plan	Activated in 2004 Inactivated in 2013 Activated in 2022	2004-R 2007 2022
13.A.02	Savings match incentive: Program that matches savings and provides financial information for participating public housing and HCV households leaving subsidized housing for homeownership or unsubsidized rental units.	2012 MTW Plan	Activated in 2013 Inactivated in 2018 Activated in 2022	2018 2022
Voucher strategies				
13.H.01	Mortgage assistance: Seattle Housing Authority may develop a homeownership program that includes mortgage subsidy.	2008 MTW Plan	Not yet implemented	None
13.H.02	180-day EOP clock: The 180-day End of Participation “clock” due to income will start when a family’s Housing Assistance Payment (HAP) reaches \$50 or less.	2010 MTW Plan	Activated in 2010	2012 2021
Public housing strategies				
13.P.01	End of Participation for higher income households in mixed-income communities: In mixed-income communities, SHA will remove subsidy when household income exceeds the established limit for six months.	2012 MTW Plan	Activated in 2016	2017 2018

Strategy	Description	First identified	Status	Year(s) updated
13.P.02	Incentives for positive tenant departures and housing stability: SHA may provide a financial incentive to public housing households who vacate their unit in a manner consistent with SHA unit guidelines.	2019 MTW Plan	Activated in 2019	None

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual significant changes

None.

MTW Activity #15: Combined program management

Status

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

Description

In some of its communities, SHA co-locates units funded through project-based vouchers and low-income public housing. Combining program management and policies for both types of units (referred to as Streamlined Low Income Housing Program, or SLIHP, units) within the same community reduces costs by eliminating redundancies, including duplicative rent reviews and inspections. It also avoids unnecessary disparities between tenants of the two different types of units. SHA's current implementation of this activity allows for all units subsidized by project-based housing choice vouchers to be operated like public housing subsidized units in communities that receive both subsidy types. 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.

SHA applies Strategy 15.A.01 to SPVs.

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

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

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

SHA applies 18.A.02 and 18.A.03 to SPVs.

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual 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.

SHA applies Strategies 19.H.02 and 19.H.03 to SPVs.

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
19.H.01	Limiting portability in high-cost areas: SHA may deny requests for portability moves to another jurisdiction when the receiving housing authority intends to administer rather than absorb the voucher and the resulting payment standard would be higher than SHA's payment standard.	2013 MTW Plan	Not yet implemented	None
19.H.02	Housing choice moving cost assistance and support: SHA may develop a program for voucher households to provide assistance with housing search, access supplements, deposits and similar costs, outreach and incentives for landlord participation such as risk reduction funds and access supplements.	2014 MTW Plan	Activated in 2015	2015 2017 2018
19.H.03	One-year residency requirement before port out: SHA may require that Housing Choice Voucher households live in Seattle for one year before moving with their voucher to a different community.	2015 MTW Plan	Activated in 2015	None
19.H.04	Streamlined local timelines and processes for improved leasing success: SHA may modify leasing timelines and processes to support leasing success and improve efficiency	2019 MTW Plan	Activated in 2019	None

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual significant changes

None.

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

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
20.A.01	Use of funds for local non-traditional affordable housing: SHA may use Block Grant funds to develop, capially improve, maintain and operate affordable housing outside of the traditional public housing and voucher programs.	2013 MTW Plan	First used in 2011	2013-R 2015
20.A.02	Reintegration Housing Program: SHA may operate a program to provide short-term bridge housing for	2024 MTW Plan	Activated in 2024	None

	households with at least one member returning to the community from incarceration.			
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Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual significant changes

SHA added new *Strategy 20.A.02: Reintegration Housing Program*.

MTW Activity #22: Housing assistance for school stability

Status

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

Description

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

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

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

Approved strategies in this activity are as below.

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

Impact

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

This activity is **on schedule**.

Updates

None.

Actual non-significant changes

None.

Actual 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.

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 2024 investment flexibility was not needed and all SHA investments followed HUD policies.

Approved strategies in this activity are as below.

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

Reactivation

SHA annually assesses potential investments to determine which investment policies are most beneficial. MTW alternate investment policies were not needed in 2024. However, SHA continues to revisit its investment strategies annually in consideration of both the agency's financial plans and available investment opportunities.

D. Closed out activities

MTW Activity #6: MTW block grant and fungibility

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #7: Procurement

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #14: Related nonprofits

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

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

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #17: Performance standards

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

(V) Planned application of MTW funds

A. Financial reporting

i. Available MTW funds in 2024

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

ii. Expenditures of MTW funds in 2024

The MTW Block Grant is a critical element of MTW participation, allowing MTW housing authorities to combine Public Housing capital, operating and most Housing Choice Voucher subsidies into a single source of funding that they can allocate to meet local housing and service needs of low-income people in Seattle. The following table describes how SHA used single fund flexibility in 2024. SHA submitted unaudited and audited information in the prescribed FDS format through the FASPHA.

iii. Describe application of MTW funding flexibility

Application of MTW funding flexibility
<p>Seattle Housing Authority's use of MTW funding flexibility is important in supporting the agency's array of low-income housing programs and services, its local partnerships, and to meet locally defined needs. SHA uses this single fund flexibility as required by the First Amendment to the MTW Agreement. Funding flexibility allowed under MTW supports a variety of low-income housing services and programs and is central to the agency's Local Asset Management Plan (LAMP). SHA's LAMP includes the whole of its operations, including sources and uses of revenue. During 2024, SHA exercised its MTW flexibility to allocate MTW revenues among the Authority's housing and administrative programs. This enabled SHA to further its mission and strategic plan by balancing the mix of housing types, services, capital investment and administrative support to different low-income housing programs and different groups of low-income residents and voucher participants.</p> <p>In 2024, Seattle Housing used single fund authority of \$108.8 million to support the following activities:</p> <ul style="list-style-type: none">• Support resident and voucher households to achieve greater economic stability through building assets, achieving education goals and gaining job opportunities.• Provide community supportive services and health and wellness programs for public housing participants such as case management, education and youth activities to support housing stability and education achievement.

- Low-income housing acquisition, development, preservation and rehabilitation to increase SHA's capacity to serve more low-income people through owned and/or managed residential facilities.
- Acquire a permanent office space for SHA departments to enhance the management of low-income-housing programs.
- Direct support of local low-income housing operations, assistance, capital repairs and program support to ensure safe, decent and affordable housing.

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

B. Local asset management plan

- | | | |
|------|---|-----|
| i. | Did SHA allocate costs within statute in 2024? | Yes |
| ii. | Did SHA implement a local asset management plan (LAMP) in 2024? | Yes |
| iii. | Did SHA provide a LAMP in the appendix? | Yes |
| iv. | If SHA has provided a LAMP in the appendix, please provide a brief update on implementation of the LAMP. Please provide any actual changes (which must be detailed in an approved Annual MTW Plan/Plan amendment) or state that SHA did not make any changes in 2024. | |

The Seattle Housing Authority (SHA) continues to operate under its approved Local Asset Management Plan (LAMP), as first stipulated in the 2024 Annual Plan and in practice since the beginning of its MTW participation. No significant changes were made to Seattle Housing's LAMP during 2024. SHA updates its Indirect Service Fees (ISF) annually and adds new programs if/when created. SHA submitted the LAMP with its 2024 MTW Plan and it was approved by HUD in a letter received on February 21, 2024.

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

SHA's ISF is based on anticipated indirect costs serving all direct service programs. In accordance with OMB Circular 200 requirements, the ISF is determined in a reasonable and consistent manner based on total units and leased vouchers. The ISF is a standard fee calculated annually per housing unit and leased voucher charged each month to each program. Please see the LAMP in the appendices to review SHA's Indirect Cost Plan.

(VI) Administrative

A. Review, audits and inspections

SHA received no findings from HUD audits and monitoring visits that required actions to correct in 2024.

B. Evaluation results

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

C. MTW statutory requirement certification

SHA certifies that the agency has met the three MTW statutory requirements in 2024.

1. At least 75% of families assisted by SHA are very low income.
 - SHA certifies that it is meeting this statutory objective. HUD, as stated in Section II, will confirm this with PIC data and the information SHA provides in this Report on households served by LNT programs.
2. SHA continues to assist substantially the same total number of households as would have been assisted had SHA not participated in the MTW Demonstration.
3.
 - SHA continued to meet this requirement in 2024. Supporting details in HUD's prescribed format may be submitted separately from this Report.
4. SHA has maintained a comparable mix of households (by family size) served as would have been served had SHA not participated in the MTW Demonstration.
5.
 - SHA has maintained a comparable mix of families by family size in 2024 as would have been served absent the Demonstration. While the distribution of family sizes served has shifted since SHA began its MTW participation, these shifts are largely attributed to non-MTW changes such as housing stock and community demographics, as explained in Section II of this Report.

D. MTW energy performance contract (EPC) flexibility data

Not applicable.

Appendix A: Housing stock and leasing overview

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

Year-end snapshot: Seattle Housing Authority housing stock

Public housing stock (MTW-funded)

The Low-Income Public Housing program (also referred to as Public Housing or LIPH) included 5,270 units as of year-end 2024. Public housing units are in high-rises (large apartment buildings), Scattered Sites units (small apartment buildings and single-family homes scattered throughout the city) and in communities at High Point, Lake City Court, NewHolly, Rainier Vista and Yesler. HUD's MTW Block Grant provides funding to help pay for operating costs exceeding rental income. Households typically pay approximately 30% of their monthly income for rent and utilities. About 100 of these Public Housing units are utilized by service providers who provide transitional housing or services to residents. More than 900 public housing units are part of the Seattle Senior Housing Program. Forty units receiving Public Housing subsidy through SHA are owned by nonprofits and operated as traditional Public Housing.

Voucher stock (MTW-funded)

The Housing Choice Voucher (HCV) program is also known Section 8. The program is a public/private partnership that provides vouchers (housing subsidies) to low-income families for use in the private rental housing market. At year-end 2024, SHA administered 10,744 vouchers funded through HUD's MTW Block Grant.

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

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

Housing stock (non-MTW federally funded)

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

Moderate Rehab

SHA administers HUD Section 8 Moderate Rehab funding for 126 units operated by partner nonprofits serving extremely low-income individuals.

Section 8 New Construction

SHA has administered Section 8 New Construction properties in the past, but did not have any of these properties in its portfolio in 2024.

Special purpose vouchers

SHA administers vouchers for special purposes (2,351 as of year-end 2024), such as housing previously homeless veterans and reuniting families. These vouchers, referred to collectively as SPVs, are often awarded competitively and funding is provided outside of the MTW Block Grant.

Other affordable housing

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

Senior housing

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

Remaining in the Seattle Senior Housing Program (as of year-end 2024) are 109 units without Public Housing subsidy.

Tax credit and other housing types

SHA operates 2,158 units of other types of housing, including locally subsidized housing and unsubsidized housing. Units are located in townhomes and small apartment complexes throughout Seattle, including low- and moderate-income rental housing in the agency's redeveloped family communities (High Point, NewHolly, Rainier Vista and Yesler). These units do not receive ongoing operating subsidy, with the exception of project-based vouchers in selected units.

Changes in housing inventory

MTW Block Grant-funded housing	YE 2023	YE 2024
Housing Choice Vouchers	10,610	10,744
<i>Tenant-based vouchers</i>	5,881	5,759
<i>Project-based vouchers (partner-owned)</i>	3,235	3,402
<i>Project-based vouchers (SHA-owned)</i>	1,462	1,551
<i>Program-based vouchers (SHA-owned)</i>	10	10
<i>Provider-based vouchers</i>	22	22
Public housing	5,243	5,270
<i>SHA-owned*</i>	5,203	5,230
<i>Partner-owned</i>	40	40
Total MTW Block Grant-funded housing units	15,853	16,014

Other HUD-funded housing	YE 2023	YE 2024
Housing Choice Vouchers (Special Purpose Vouchers)**	2,465	2,351
<i>Emergency Housing Vouchers (EHV)</i>	518	518
<i>Family Unification Program (FUP)</i>	275	275
<i>Foster Youth Initiative (FYI)</i>	163	163
<i>Housing conversion (tenant protection)</i>	127	0
<i>Mainstream disability vouchers</i>	317	305
<i>Non-Elderly Disabled vouchers (NED)</i>	442	428
<i>RAD</i>	396	396
<i>Veterans Affairs Supportive Housing (VASH)</i>	669	662
Section 8 New Construction	0	0
Section 8 Moderate Rehab	238	126
Total other HUD-funded housing units	3,145	2,873

Other affordable housing	YE 2023	YE 2024
Seattle Senior Housing Program (SSHP)*	136	109
Tax credit housing (without subsidy)	1,054	1,099
Other affordable housing	892	950
Managed by SHA for other owners	0	0
Total other affordable housing units	2,082	2,158

	YE 2023	YE 2024
Total housing units***	21,080	21,045

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

** Some SPVs are project-based as follows (with the subset in SHA units in parentheses): FUP 0 (0), housing conversion 0 (0), Mainstream 80 (57), RAD 396 (113), VASH 162 (114).

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

Appendix B: Actual existing project-based vouchers

The below table consists of the tenant-based vouchers that were project-based in 2024. This section meets the requirements prescribed in HUD Form 50900 Section II.A.ii: Actual existing project-based MTW vouchers.

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Palmer	29	29	Leased /Issued	No	Permanent supportive housing
Palmer	5	5	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
104 th St. Townhomes	3	3	Leased /Issued	No	Affordable housing
13 th & Fir	92	92	Leased /Issued	No	Affordable housing
A Place of Our Own	19	19	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	12	Leased /Issued	No	Enhanced behavioral health services
Alderbrook Place (formerly CPC Alderbrook)	14	2	Leased /Issued	No	Enhanced behavioral health services
Aldercrest	8	8	Leased /Issued	No	Affordable housing
Almquist Apartments	50	50	Leased /Issued	No	Permanent supportive housing (SPV-Mainstream)
Almquist Apartments	52	52	Leased /Issued	No	Permanent supportive housing
Arbora Court	40	40	Leased /Issued	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	6	Leased /Issued	No	Affordable housing
Aurora House	30	30	Leased /Issued	No	Permanent supportive housing
Avalon Place	9	9	Leased /Issued	No	Permanent supportive housing
Baldwin Apartments	15	15	Leased /Issued	No	Affordable housing
Bayview Tower	33	44	Leased /Issued	No	Affordable housing
Beacon House	6	6	Leased /Issued	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	5	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Bergan Place	2	2	Leased /Issued	No	Homeless young adults
Bergan Place	8	8	Leased /Issued	No	Affordable housing
Brettler Family Place I and II	51	51	Leased /Issued	No	Affordable housing
Brettler Family Place III	21	21	Leased /Issued	No	Service-enriched for homeless families and individuals
Broadway Crossing	10	10	Leased /Issued	No	Affordable housing
Broadway Crossing	9	9	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Bush Hotel	7	7	Leased /Issued	No	Affordable housing
Casa Pacifica	6	6	Leased /Issued	No	Affordable housing
Casa Pacifica	5	5	Leased /Issued	No	Affordable housing
Cascade Court Apartments	3	3	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Cascade Court Apartments	5	5	Leased /Issued	No	Affordable housing
Cate Apartments	10	10	Leased /Issued	No	Affordable housing
Cate Apartments	15	15	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Cedar Crossing	7	7	Leased /Issued	No	Affordable housing
Centerwood Apartments	2	2	Leased /Issued	No	Affordable housing
Cluster SMH (Community Psychiatric Clinic)	14	14	Leased /Issued	No	Enhanced behavioral health services
Colonial Gardens	20	20	Leased /Issued	No	Affordable housing
Columbia Court	13	13	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	16	16	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Compass Broadview	18	18	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	33	Leased /Issued	No	Permanent supportive housing
Compass on Dexter	10	10	Leased /Issued	No	Service-enriched for homeless individuals (SPV-VASH)
Compass on Dexter	36	36	Leased /Issued	No	Service-enriched for homeless individuals
Council House	30	30	Leased /Issued	No	Senior housing
Crestwood Place Apartments	6	6	Leased /Issued	No	Affordable housing
Croft Place	7	7	Leased /Issued	No	Affordable housing
David Colwell Building	25	25	Leased /Issued	No	Affordable housing
Dekko Place	5	5	Leased /Issued	No	Affordable housing
Delridge Heights Apartments	3	3	Leased /Issued	No	Affordable housing
Delridge Triplexes	6	6	Leased /Issued	No	Affordable housing
Denny Park Apartments	5	5	Leased /Issued	No	Affordable housing
Denny Park Apartments	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
DESC	12	12	Leased /Issued	No	Enhanced behavioral health services
Eastern Hotel	4	4	Leased /Issued	No	Affordable housing
Eastlake Supportive Housing	25	25	Leased /Issued	No	Permanent supportive housing
Emerald City Commons	12	12	Leased /Issued	No	Affordable housing
Ernestine Anderson Place	8	8	Leased /Issued	No	Service-enriched for homeless individuals (SPV-VASH)
Ernestine Anderson Place	33	33	Leased /Issued	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	15	Leased /Issued	No	Permanent supportive housing
Evans House	49	49	Leased /Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Fir Street Apartments	7	7	Leased /Issued	No	Affordable housing
First Place	4	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	25	Leased /Issued	No	Senior housing
Four Freedoms House	126	126	Leased /Issued	No	Senior housing
Fremont Solstice Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Gardner House	22	22	Leased /Issued	No	Service-enriched for homeless families (with at least one minor) (SPV-Mainstream)
George Fleming Place	15	15	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
The Genessee	17	17	Leased /Issued	No	Affordable housing
The Genessee	3	3	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Golden Sunset	36	47	Leased /Issued	No	Affordable housing
Gossett Place	10	10	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
Gossett Place	10	10	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
Gossett Place	12	12	Leased /Issued	No	Permanent supportive housing
Gossett Place	28	28	Leased /Issued	No	Permanent supportive housing
High Point	100	100	Leased /Issued	No	Affordable housing
Hilltop House	30	30	Leased /Issued	No	Senior housing
Hinoki Apartments	82	82	Leased /Issued	No	Affordable housing
Hoa Mai Gardens	70	70	Leased /Issued	No	Affordable housing
Hobson Place	63	63	Leased /Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Holden Manor	1	1	Leased /Issued	No	Affordable housing
Holden Street Family Housing (Santa Teresita del Niño Jesus)	25	25	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	6	Leased /Issued	No	Affordable housing
Humphrey House	4	4	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
Humphrey House	71	77	Leased /Issued	No	Permanent supportive housing
Imani Village	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Jefferson Terrace	283	283	Leased /Issued	No	Affordable housing
Josephinum Apartments	3	3	Leased /Issued	No	Service-enriched for homeless individuals (SPV-VASH)
Josephinum Apartments	25	25	Leased /Issued	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	49	Leased /Issued	No	Service-enriched for homeless individuals
Judkins Park	4	4	Leased /Issued	No	Affordable housing
Judkins Park	4	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
The Julie Apartments	2	2	Leased /Issued	No	Affordable housing
The Julie Apartments	20	20	Leased /Issued	No	Affordable housing
The Julie Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
The Karlstrom	17	17	Leased /Issued	No	Service-enriched for homeless individuals
Kebero Court	83	83	Leased /Issued	No	Affordable housing
Kenyon Housing	18	18	Leased /Issued	No	Permanent supportive housing
Kerner-Scott House	15	15	Leased /Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Kingway Apartments	16	16	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Kristin Benson Place	77	77	Leased /Issued	No	Permanent supportive housing
Lake City Commons	15	15	Leased /Issued	No	Affordable housing
Lake Washington Apartments	37	37	Leased /Issued	No	Affordable housing
Lakeview Apartments	5	5	Leased /Issued	No	Affordable housing
Lakeview Apartments	6	6	Leased /Issued	No	Affordable housing
Lakeview Apartments	15	15	Leased /Issued	No	Affordable housing
Legacy House	22	22	Leased /Issued	No	Senior housing
Leschi House	35	35	Leased /Issued	No	Senior housing
Lewiston Apartments	7	7	Leased /Issued	No	Permanent supportive housing (SPV-Mainstream)
Lewiston Apartments	28	28	Leased /Issued	No	Permanent supportive housing
Lincoln Apartments	4	4	Leased /Issued	No	Affordable housing
Longfellow Creek	1	1	Leased /Issued	No	Affordable housing (SPV-VASH)
Lyon Building	12	12	Leased /Issued	No	Permanent supportive housing
Main Street Apartments	2	2	Leased /Issued	No	Affordable housing
Main Street Place	8	8	Leased /Issued	No	Affordable housing
Market Terrace	7	7	Leased /Issued	No	Affordable housing
Marion West	25	25	Leased /Issued	No	Affordable housing
Martin Court	28	28	Leased /Issued	No	Service-enriched for homeless individuals
Martin Court	13	13	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Junior Apartments	10	10	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Martina Apartments (formerly CHS Greenwood)	66	66	Leased /Issued	No	Permanent supportive housing
Mary Avenue Townhomes	8	8	Leased /Issued	No	Affordable housing
McDermott Place (Lake City Court)	10	10	Leased /Issued	No	Permanent supportive housing
McDermott Place	10	10	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
McDermott Place	10	10	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
McDermott Place	10	10	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
McDermott Place	15	15	Leased /Issued	No	Permanent supportive housing
Meadowbrook View Apartments	15	15	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Mercer Court	3	3	Leased /Issued	No	Affordable housing
Monica's Village Place	38	38	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	13	Leased /Issued	No	Affordable housing
Morrison Hotel	190	190	Leased /Issued	No	Permanent supportive housing
Muslim Housing	10	10	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	5	4	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Nihonmachi Terrace	20	20	Leased /Issued	No	Affordable housing
Nihonmachi Terrace	5	5	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	15	Leased /Issued	No	Affordable housing
NP Hotel	5	5	Leased /Issued	No	Affordable housing
Oleta Apartments	6	6	Leased /Issued	No	Affordable housing
One Community Commons	5	5	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
One Community Commons	7	7	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Opportunity Place	145	144	Leased /Issued	No	Permanent supportive housing
Ozanam House (formerly Westlake II)	29	29	Leased /Issued	No	Permanent supportive housing
Pacific Hotel	6	6	Leased /Issued	No	Permanent supportive housing
Palo Studios at the Josephinum	7	7	Leased /Issued	No	Service-enriched for homeless individuals
Pantages Apartments	10	10	Leased /Issued	No	Affordable housing
Pantages Apartments	11	11	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	3	Leased /Issued	No	Affordable housing
Park Place	100	100	Leased /Issued	No	Assisted living
Park Place	36	36	Leased /Issued	No	Assisted living
Parker Apartments	8	8	Leased /Issued	No	Affordable housing
Parkview Services	23	22	Leased /Issued	No	Affordable housing for people with disabilities
Pat Williams Apartments	21	21	Leased /Issued	No	Permanent supportive housing
Patricia K. Apartments	10	10	Leased /Issued	No	Permanent supportive housing (SPV-Mainstream)
Patricia K. Apartments	12	12	Leased /Issued	No	Permanent supportive housing
Patrick Place	40	40	Leased /Issued	No	Permanent supportive housing
Pioneer Human Services	11	0	Leased /Issued	No	Enhanced behavioral health services
Plymouth on First Hill	77	77	Leased /Issued	No	Permanent supportive housing
Plymouth on Stewart	7	7	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
Plymouth on Stewart	74	77	Leased /Issued	No	Permanent supportive housing
Plymouth Place	70	70	Leased /Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Rainier Vista NE	23	23	Leased /Issued	No	Affordable housing
Raven Terrace	50	50	Leased /Issued	No	Affordable housing
Ravenna Springs Properties	13	14	Leased /Issued	No	Affordable housing
Red Cedar	80	80	Leased /Issued	No	Affordable housing
Rise at Yancy	44	44	Leased /Issued	No	Permanent supportive housing
Rose of Lima House	30	30	Leased /Issued	No	Permanent supportive housing
Rose Street Apartments	4	4	Leased /Issued	No	Affordable housing
Salish Landing (formerly Lam Bow)	51	51	Leased /Issued	No	Affordable housing
Samaki Commons	12	12	Leased /Issued	No	Affordable housing
Samaki Commons	8	8	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Campus	18	18	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	21	Leased /Issued	No	Permanent supportive housing for families
Scattered Sites – Bitterlake Portfolio	54	54	Leased /Issued	No	Affordable housing
Scattered Sites – Madison Portfolio	17	17	Leased /Issued	No	Affordable housing
Scattered Sites – Northeast Seattle Portfolio	38	38	Leased /Issued	No	Affordable housing
Scattered Sites – Northwest Seattle Portfolio	47	47	Leased /Issued	No	Affordable housing
Scattered Sites – South Park Portfolio	16	16	Leased /Issued	No	Affordable housing
Scattered Sites – South Seattle Portfolio	10	10	Leased /Issued	No	Affordable housing
Scattered Sites – University District Portfolio	5	5	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Scattered Sites – West Seattle Portfolio	41	41	Leased /Issued	No	Affordable housing
Sea-Mar Family Housing	5	5	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
SHA-SFD Special Portfolio	1	1	Leased /Issued	No	Affordable housing
Simons Senior Housing Apartments	7	7	Leased /Issued	No	Permanent supportive housing (SPV-VASH)
Simons Senior Housing Apartments	78	81	Leased /Issued	No	Permanent supportive housing
South Shore Court (formerly Douglas Apartments)	4	4	Leased /Issued	No	Affordable housing (SPV-VASH)
South Shore Court (formerly Douglas Apartments)	9	9	Leased /Issued	No	Affordable housing
Spruce Street Apartments	10	10	Leased /Issued	No	Affordable housing
Starliter Apartments	6	6	Leased /Issued	No	Affordable housing
Stone Avenue Townhomes	4	4	Leased /Issued	No	Affordable housing
Stone Way Apartments	21	21	Leased /Issued	No	Affordable housing
Stone Way Apartments	14	14	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Sylvia Odom's Place	64	64	Leased /Issued	No	Permanent supportive housing graduates
Tamarack Place	20	20	Leased /Issued	No	Affordable housing
Traugott Terrace	40	40	Leased /Issued	No	Service-enriched for homeless individuals in recovery
Tyree Scott Apartments	10	10	Leased /Issued	No	Affordable housing
Tyree Scott Apartments	6	6	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase I	17	17	Leased /Issued	No	Affordable housing

Property name	Number of project-based vouchers		Status at end of 2024	RAD?	Description of project
	Planned	Actual			
Views on Madison Phase I	10	10	Leased /Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase II	7	7	Leased /Issued	No	Affordable housing
Villa Park	6	6	Leased /Issued	No	Affordable housing
Village Square II Apartments	31	31	Leased /Issued	No	Affordable housing
Vivian McLean Place Apartments	4	4	Leased /Issued	No	Affordable housing
Weller Apartments	49	49	Leased /Issued	No	Affordable housing
Westwood Heights East	22	22	Leased /Issued	No	Affordable housing
West Seattle Affordable Housing (formerly Longfellow/Wisteria)	19	19	Leased /Issued	No	Affordable housing
Yesler Court	5	5	Leased /Issued	No	Affordable housing
YWCA Women's Residence	15	15	Leased /Issued	No	Permanent supportive housing
YWCA Women's Residence	38	38	Leased /Issued	No	Permanent supportive housing for women
Actual total existing PBVs	4,961	4,970			
Total projects/contracts	208	208			

Appendix C: 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 almost 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 24 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 2024, SHA was 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 funding flexibility authority and flexibility to optimize housing opportunities provided by SHA to low-income people in Seattle.*

SHA's flexibility to use MTW funding flexibility 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 federal 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 funding 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% 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 2024 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:

[0Attachment 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

Submitted March 31, 2025

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	
11.	Work with auditors and audit preparation.
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.
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.
16.	Investment and reporting on HCV proceeds.
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.
19.	Insurance costs for fidelity or crime and dishonesty coverage for COCC employees based on a reasonable allocation method.
20.	Commissioners' stipend and non-training travel.
21.	Commissioners' training that exceed HUD standards

Fee/indirect expense per SHA LAMP	
11.	Work with auditors and audit preparation.
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.
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.
16.	Investment and reporting on HCV proceeds.
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.
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.
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.
	<ul style="list-style-type: none"> Other maintenance expenses, Section 504 compliance, pest 		<ul style="list-style-type: none"> Other maintenance expenses, Section 504 compliance, pest
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 exceeds HUD standards	21.	Commissioners' training that exceeds HUD standards