



Seattle Housing Authority **Moving to Work** **2025 Annual Plan**



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¹ All staff positions current as of 10.17.2024.

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I. Introduction

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

SHA provides affordable housing to almost 38,000 people² through a variety of opportunities including SHA owned/managed units, subsidizing collaborative units operated by non-profit partners and tenant-based vouchers that provide subsidy to participants to rent in the private market. Thirty percent of SHA's participants in Seattle are children and about the same proportion of participants are seniors or adults with disabilities. About 83 percent of SHA households have annual incomes below 30 percent area median income and their median household income is \$14,016 annually.

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

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

The information in this Annual Plan is submitted to HUD every year following public engagement and Board approval. It follows a format prescribed by HUD in [Attachment B](#)³ to SHA's MTW Standard Agreement.

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

SHA's MTW goals and objectives for 2024 align with the goals of the MTW Demonstration: promoting cost-effectiveness, housing choice and self-sufficiency. They also further SHA's mission, values and new 2025-2030 Strategic Plan, building on SHA's twenty plus years of innovation under MTW. Through the lens of these three goals and using the flexibility authorized under MTW, SHA continuously reviews our MTW practices and policies to best maximize our resources and provide affordable housing to people with low incomes in Seattle.

Long-term MTW goals and objectives

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

² Data was pulled on 8.23.2024.

³ While a newer version of the HUD Form 50900 may be released before the approval of this Plan in early 2025, SHA is using the version current as of public comment posting (8.30.2024).

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.

In all its work, SHA takes an active stance against racism by embedding race and social justice equity throughout the agency's operations. This includes designing Moving to Work and strategic planning processes that serve as critical ways to further the agency's equity work and guide SHA toward becoming a more anti-racist organization.

Throughout 2023 and 2024, SHA undertook an intentionally anti-racist staff-led approach to creating a new 2025-2030 Strategic Plan. This process centered on shared leadership and inclusive decision-making, facilitated by a Steering Committee made up of staff in diverse roles and departments. Input from residents, voucher participants and community members was integrally woven into the process and the final plan. The approach focused on identifying racism and other structural injustices and implementing equity at the individual, institutional and structural levels. The resulting Strategic Plan is unique among Public Housing Authorities. As the plan is implemented over the next five years, SHA will continue to take a staff-driven, equity-based approach in ensuring the goals and values embodied in the plan guide and shape all of SHA's policies and operations.

SHA's 2025-2030 Strategic Plan is available [on SHA's website](#).

Short-term MTW goals and objectives

SHA continuously reviews how MTW can be utilized to further its strategic goals and mission. As a result, below are highlights of a few updates to SHA's Moving to Work activities.

Consistency in rent and income determinations

While SHA is **not** proposing changes to how household income or rent are determined, related federal rules have changed or are soon changing. SHA is making some adjustments to strategies within its already approved *MTW Activity 10: Local rent policy* to further support its ability to maintain consistency with local income determination policies. These adjustments include:

- Making non-significant changes to *Strategy 10.A.04 Streamlined medical deductions* and *Strategy 10.A.05: Asset income threshold* to maintain SHA's current approaches to calculating medical deductions and income from assets. *Strategy 10.A.05* has been renamed as "Asset strategy" to better reflect its intention and scope.
- Adding *Strategy 10.A.06: Streamlined local income determination* as a significant change to *Activity 10* which builds on updates to this activity approved in SHA's 2024 Plan. This new strategy will enable SHA to maintain its current methods of calculating income prospectively (instead of retrospectively), current interim policies and current approaches to income deductions.

SHA continues to explore options for improving the administrative (time, effort) burden of its income and rent determination policies on tenants and staff. Due to the interconnected nature of these policies, SHA may 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.

Additional updates

SHA is including the following additional non-significant changes to existing strategies:

- *Strategy 1.A.03: Total Development Cost (TDC) limits:* SHA is activating this approved strategy in 2025 and is clarifying that it will be basing TDCs on the Washington State Housing Finance Commission's requirements to better reflect local costs.
- *Strategy 9.H.09: Percent of vouchers that may be project-based:* SHA is raising the maximum percentage of vouchers which may be project based from 35 percent to 40 percent.

II. General operating information

A. Housing stock information

i. Planned new public housing units

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

Total public housing units to be added in 2025: 39

In 2025, SHA may apply to bring Ravenna School Apartments, a 39-unit elderly and disabled-designated building, into SHA's public housing Seattle Senior Housing Program (SSHP) portfolio using the units available under the agency's Faircloth limit. If SHA does so, SHA would also amend its Designation Plan to include Ravenna School Apartments with the elderly and disabled designation levels consistent with SSHP.

ii. Planned public housing units to be removed

In 2024, SHA received approval for a Section 18 Disposition of Jackson Park Village (WA001000037). SHA plans to remove them from its inventory in 2025.

AMP name and number	Number of units to be removed	Explanation for removal
Jackson Park Village WA001000037	41	Section 18 Disposition for the purpose of redevelopment.

In addition, SHA may seek disposition approval for public housing units within its Seattle Senior Housing Portfolio to pursue other funding sources that may be beneficial to the sustainability of the portfolio. **SHA is not proposing to eliminate any SSHP housing units or replace units with tenant-based vouchers.** Currently, most SSHP properties receive Low-Income Public Housing subsidy. There are other types of HUD subsidy that may provide better support for these units, such as a project-based voucher subsidy. To apply for these new funding opportunities, SHA must list them in this MTW Plan section under "units to be removed." HUD also requires that SHA use the terms "units to be removed" and "demolition and/or disposition" in the Explanation for Removal. The word "dispose" is the word HUD requires to indicate that the agency may exchange the subsidy for the units from Low Income Public Housing to a different subsidy source.

SHA may also seek disposition of units owned/operated by other housing providers but subsidized by SHA's Low-Income Housing Program through Regulatory and Operating Agreements under Developments WA001000071, WA001000072, WA001000074, WA001000075 and WA001000078. As with SSHP, any disposition-related activities with these properties would be a change in funding but not remove or affect affordability of the disposed units.

SHA will continue to evaluate its public housing-subsidized inventory to identify options for increasing long-term financial stability, addressing capital and operating needs and promoting environmental sustainability. By fully understanding and assessing the risks and benefits of pursuing different HUD programs, SHA could leverage additional or better-suited financial resources. The assessment and prioritization of the building's capital needs will be a pillar of this research. The results of the research and engagement with internal and external stakeholders will be compiled into a proposal to develop a menu of feasible financing options for each impacted property. **This evaluation will focus on ensuring the units remain affordable and that existing residents are not negatively impacted.**

Accordingly, SHA may seek HUD approval for "demolition and/or disposition" for the following developments, as well as those listed in prior approved MTW Plans, due to obsolescence or for the purposes of recapitalization, redevelopment, mixed finance redevelopment, redevelopment using the Rental Assistance Demonstration (RAD) program or other HUD funding opportunities that will serve a similar purpose.

AMP	Units	Explanation for removal
Denice Hunt Townhomes WA001000071	10	Disposition and/or demolition due to obsolescence or for the purposes of recapitalization, redevelopment, mixed finance redevelopment, or redevelopment using the Rental Assistance Demonstration (RAD) program or other HUD funding opportunities that will serve a similar purpose.
Stone View Village WA001000072	12	Same as above.
Stoneview Phase II WA001000074	7	Same as above.
Roxbury Replacement Units WA001000075	15	Same as above.
Meadowbrook View WA001000078	6	Same as above.
SSHP North WA001000092	231	Same as above.
SSHP South WA001000093	138	Same as above.
SSHP Central WA001000094	246	Same as above.
SSHP City Funded WA001000095	279	Same as above.

Total public housing units to be removed in 2025:	985
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iii. Planned new project-based vouchers

Property name	Number of vouchers to be project based	RAD?	Description of project
Jackson Park Village	41	No	Section 18 Disposition for the purpose of redevelopment. An AHAP is expected to be in place by the end of 2025.

Total planned new project-based vouchers:	41
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iv. Planned existing project-based vouchers

SHA's total **planned existing project-based vouchers for 2025 is 4,984**. The complete list includes nearly 200 projects; details can be found in Appendix A.

v. Planned other changes to MTW housing stock anticipated during 2025

Planned other changes to MTW housing stock anticipated in 2025
<p>The financing and construction process will continue for a new development on the site of Jackson Park Village (WA001000037) under SHA's Local Non-Traditional authority, resulting in an estimated 100 Low-Income Housing Tax Credit units; 41 of these will have Project-Based Vouchers.</p> <p>Construction on Juniper Apartments (AMP TBD), the final Choice Neighborhoods Initiative development in Yesler, began in 2023 and is anticipated to complete in 2025. Leasing is anticipated to begin in mid-2025, with a planned unit mix of 39 Project-Based Voucher units and 75 straight tax-credit units (including one Common Area Unit) for a total of 114 units.</p> <p>SHA may utilize Local Non-Traditional to support existing unsubsidized properties, including up to 226 units, in association with redevelopment of its Northgate and Holly Court communities.</p> <p>In 2025, SHA may also:</p> <ul style="list-style-type: none"> • Apply for land disposition for sale to market-rate developers, to Limited Partnerships to finance replacement housing and to the City of Seattle Parks Department. These sites may be part of previously approved HOPE VI and CNI developments. • Continue holding select Scattered Sites units offline to undergo substantial rehabilitation. • Consider and use HUD's Faircloth-to-RAD process to subsidize up to 1,200 units currently available under the agency's Faircloth limit. • Pursue further acquisition of additional Local, Non-Traditional housing as opportunities arise. • Apply for dispositions (as defined in 24 C.F.R. 970) that aid, assist or further SHA's mission but that do not result in the removal of any public housing units from SHA's public housing inventory, including, without limitation, the granting of easements, leases, licenses and covenants.

vi. General description of all planned capital expenditures during 2025

General description of all planned capital expenditures during 2025

In 2025, SHA plans to engage in the following capital expenditures:

Accessibility: SHA will do ADA upgrades in community rooms, mailboxes, community kitchens and shared door handles at several LIPH and SSHP buildings (multiple AMPs).

Appliances: SHA will replace appliances at a number of units in NewHolly Phase II (WA001000076).

Building exterior: SHA will repair and paint siding at Main Street Apartments (N/A) and 1821 E. Mercer St. (WA001000050). SHA will also improve exterior building signage at several SSHP buildings (multiple AMPs).

Electrical: SHA will upgrade lighting at Carroll Terrace (WA001000094). SHA will replace the entry intercom system at Main Street Place (N/A). SHA also plans to replace generators at several LIPH buildings (multiple AMPs).

Elevator: SHA will upgrade the elevator at Michaelson Manor (WA001000094).

Flooring: SHA will replace carpet at Holly Court (WA001000041). SHA will also replace flooring at NewHolly Phase II (WA001000076) and West Town View (WA001000088).

HVAC: SHA will install an HVAC roof unit and replace five air handling units at the community building at Center Park (WA001000087). SHA will add air conditioning to the office at Westwood Heights (WA001000023) and the common area at Columbia Place (WA001000093).

Interior upgrades: SHA will rehab one unit at Ravenna Springs (N/A). SHA will replace the bathroom tub surrounds at Main Street Place (N/A). SHA will perform other interior upgrades and repairs at Daybreak (N/A), Main Street Apartments (N/A) and various LIPH buildings (multiple AMPs).

Life safety: SHA will replace the fire alarm panel at Fort Lawton Place (WA001000094).

Painting: SHA will paint the common areas at Bell Tower (WA001000015) and Nelson Manor (WA001000095). SHA will also paint some interiors and replace ceiling tiles at Olympic West (WA001000087).

Plumbing: SHA will re-pipe hillside units at NewHolly Phase II (WA001000076). SHA will replace boilers at NewHolly Phase II (WA001000076) and NewHolly Phase III (WA001000079).

Roofing: SHA will clean the roof and gutters at NewHolly Phase II (WA001000076). SHA will repair the gutters at Blakeley Manor (WA001000095).

Security: SHA will install ACAM in the laundry room at Bell Tower (WA001000015) and upgrade the ACAM at NewHolly Phase III (WA001000079). SHA will improve the security fence at the South Operations Facility (N/A). SHA will install security lighting and limiters at Columbia Place (WA001000093). SHA will also install a camera system at Montridge Arms (N/A).

General description of all planned capital expenditures during 2025

Site work: SHA will repair parking lots at 8802 Midvale Ave. N. and 535 S. Donovan St. (both WA001000050), as well as Nelson Manor (WA001000095). SHA will also resurface the parking lot at Columbia Place (WA001000093) and restripe the parking lot at NewHolly Phase II (WA001000076) and various Scattered Sites (WA001000050). SHA will remove a tree and repair fences at NewHolly Phase II (WA001000076). SHA will replace sprinkler heads at Main Street Apartments (N/A) and several LIPH properties (multiple AMPs). SHA will repair the garbage station area at Olmsted Manor (WA001000095). SHA will install fall protection at the playground at NewHolly Phase III (WA001000079). SHA will replace the retaining wall and fence at Pinehurst Court Apartments (WA001000092).

B. Leasing information

i. Planned number of households served

Planned number of households served through:	Planned number of unit months occupied/leased	Planned number of households to be served
MTW public housing units leased ⁴	60,975	5,081
MTW Housing Choice Vouchers (HCV) utilized ⁵	126,267	10,522
Local, non-traditional: Tenant-based	612	51
Local, non-traditional: Property-based	9,255	771
Local, non-traditional: Homeownership	0	0

Planned total households served:	197,109	16,425
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Local, non-traditional category	MTW activity name/number	Planned number of unit months occupied/leased	Planned number of households to be served
Tenant-based	MTW Strategy 8.P.01: Agency units for housing and related supportive services	252	21
	MTW Strategy 20.A.02: Reintegration housing program	360	30
Property-based	MTW Strategy 20.A.01: Use of funds for local, non-traditional affordable housing	9,255	771
Homeownership	None	0	0

⁴ 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 households. These units are excluded in the table below to avoid double-counting.

⁵ Housing Choice Voucher unit months leased/households includes all voucher types included in HUD's Substantially the Same calculation.

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

Housing program	Description of anticipated leasing issues and possible solutions
MTW public housing	SHA does not anticipate leasing difficulties in 2025. New and continuing building rehabs at several properties impacts the number of available public housing units. Despite these challenges, SHA anticipates that high occupancy levels will continue.
MTW Housing Choice Voucher	<p>SHA anticipates achieving and maintaining a significant increase in MTW voucher utilization in 2025.</p> <p><i>Tenant-based:</i> Over the course of six months in 2024, SHA drew 1,500 applicants from its newly opened voucher list. Processing applications and issuing vouchers in such high volume poses challenges. SHA anticipates the number of shoppers to continue to grow throughout 2024, resulting in a large number of shoppers in the market at the same time.</p> <p><i>Project-based:</i> Staffing partner turnover and population challenges has created leasing roadblocks for SHA's project-based program. The agency has been engaging directly with housing partners on the issues they are facing in an effort to improve project-based leasing.</p>
Local, non-traditional	SHA's LNT units typically do not have waiting lists. The agency therefore leases in response to the affordable housing market and needs of prospective renters. SHA anticipates that leasing will be strong throughout 2025.

C. Waiting list information

i. **Waiting list information anticipated at the beginning of 2025**

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Plans to open the waiting list during 2025
MTW public housing ⁶	Site-based	5,477	Open	Already open
MTW Housing Choice Voucher (tenant-based)	Community-wide	23,970	Open	Already open
MTW Housing Choice Voucher (property-based) ⁷	Site-based	4,228	Partially open	Already open

⁶ Since 2019 SHA includes project-based units located in portfolios that also operate public housing in the public housing waiting list consistent with our MTW Activity 15: Combined program management and selected LNT properties.

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

ii. Planned changes to waiting list in 2025

Waiting list name	Description of planned changes to waiting list
MTW public housing	No changes anticipated.
MTW Housing Choice Voucher (tenant-based)	No changes anticipated. In February of 2024, SHA opened its regular tenant-based voucher list for the first time since 2017. SHA now maintains an open voucher list with no plans to close it.
MTW Housing Choice Voucher (property-based)	No changes anticipated.

III. Proposed MTW activities

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

Proposed MTW activities

SHA is not proposing any new MTW activities in 2025.

Proposed MTW strategies

SHA is not proposing any new MTW activities in 2025.

IV. Approved MTW activities

Introduction

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

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

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

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

17. [Performance standards](#)

In the following pages, we provide descriptions of these MTW activities that have been previously approved and describe any anticipated updates for 2025.

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), housing choice voucher-specific (noted with an “H”) and public housing-specific strategies (noted with a “P”). These categorizations are neither official nor limiting in the application of the strategies. The dates in the “Year(s) updated” column are supplied for the purpose of enabling readers to easily find significant updates since a strategy was first identified. Some updates may be unintentionally left out.

Emergency response and recovery

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

A. Implemented activities

MTW Activity #1: Development simplification

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated ⁸
Agency-wide strategies				
1.A.03 (Recategorized from 1.P.03 in 2025)	Total Development Cost limits: Replace HUD's Total Development Cost limits with reasonable limits that reflect the local marketplace for quality construction in Seattle.	1999 MTW Plan	Activated in 2025	2019 2025
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	Reclassified as 1.A.03			
1.P.04	Streamlined mixed-finance closings: Utilize a streamlined process for mixed-finance closings	2000 MTW Plan	Activated in 2005	2005 2006 2012
1.P.05	Streamlined public housing demo/dispo process: Utilize a streamlined demolition/disposition protocol negotiated with the Special Applications Center for various public housing dispositions	2000 MTW Plan	Activated in 2004	2004 2006 2009 2012
1.P.06	Local blended subsidy: SHA may blend public housing and Housing Choice Voucher funds to subsidize units that serve households earning below 80 percent of Area Median Income.	2018 MTW Plan	Not yet implemented	2019

2025 Updates

SHA has one update to a strategy in Activity 1.

- *Strategy 1.A.03: Total Development Cost limits:*

SHA is recategorizing the strategy from 1.P.03 to 1.A.03 to clarify that it is not limited to Public Housing-only developments.

Planned non-significant changes

SHA has one non-significant change to a strategy in Activity 1.

- *Strategy 1.A.03: Total Development Cost limits:*

⁸ 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.

SHA is updating this strategy to specify that it will use the Washington State Housing Finance Commission's Total Development Cost limits for Seattle and, if needed, TDC waiver process to establish reasonable cost limits that reflect Seattle's market conditions in lieu of HUD's TDC limits for all applicable activities including development, acquisition and rehabilitation of affordable housing using Public Housing or Local, Non-Traditional funding..

As part of its affordable housing Cost Containment Policy⁹, the Washington State Housing Finance Commission developed and maintains Total Development Cost limits based on robust third-party data that reflect differences in localities throughout the State of Washington, such as the City of Seattle, which are reviewed annually¹⁰. These TDC limits are inclusive of total residential project costs and all funding sources, reflecting the necessity of leveraging a multitude of resources needed to finance affordable housing for people with low incomes.

WSHFC's waiver process is also robust. When a given project's costs are expected to exceed these limits, written justification paired with an estimate of the costs associated with each excessive cost factor (e.g. site conditions, site constraints, requirements of local jurisdictions) is required. Updated schedules of TDC limits and related policies, including waiver requirements and approval processes, are typically published annually at www.wshfc.org.

Planned changes to metrics/data collection

None.

Planned 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

⁹ WSHFC is required to report on development cost data and its Cost Containment Policy to the Washington State Legislature annually. See pages 4-5 of the most recent [Annual Affordable Housing Cost Data – Report to the Washington State Legislature, December 2023](#).

¹⁰ Section 2.4 of [2025 Bond/Tax Credit Program Policies](#) provides current Total Development Cost limit policies. The most recent TDC limits (2025) are published on WSHFC's [website](#).

childcare and transportation and helps residents sign up for college or vocational training, apply for jobs or explore buying a home.

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
2.A.01	FSS: Partner with City: Partner with the City of Seattle to share responsibilities and resources for a new integrated FSS program.	1999 MTW Plan	Not yet implemented	None
2.A.02	SJI preference + time limits: Preference for Seattle Jobs Initiative participants coupled with time limits.	1999 MTW Plan	Not yet implemented	None
2.A.03	FSS escrow accounts: Use local policies for determining escrow calculation, deposits, and withdrawals.	2007 MTW Plan	Activated in 2018	2017 2020 2021
2.A.04	FSS participation contract: Locally designed contract terms including length, extensions, interim goals, and graduation requirements.	2007 MTW Plan	Activated in 2018	2018 2020 2021
2.A.05	FSS Program Coordinating Committee: Restructure Program Coordinating Committee (PCC) to better align with program goals and local resources.	2007 MTW Plan	MTW authority not needed	None
2.A.06	FSS program incentives: Provide incentives to participants including those who do not receive escrow deposits, including program offerings for non-heads of household and other members not enrolled in HUD's FSS program.	2007 MTW Plan	Activated in 2018	2016 2018 2020 2021
2.A.07	FSS selection preferences: Up to 100 percent of FSS enrollments may be selected by local preferences.	2007 MTW Plan	Activated in 2018	2016

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #3: Inspection protocol

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
3.A.01	Private sector cost benefit and risk management approaches to inspections such as avoiding duplicative inspections by using other recent inspections for agencies such as the Washington State Housing Finance Commission	1999 MTW Plan	Activated in 2020	2003 2004 2009 2012 2019 2020 2021
3.A.03 (Combined and recategorized from 3.H.03, 3.P.01)	Reduced frequency of inspections: Cost-benefit approach to housing inspections allows Seattle Housing to establish local inspection protocol, including less frequent inspections and interchangeable use of HQS/UPCS/UPCS-V/NSPIRE.	1999 MTW Plan	Activated in 2003	2002 2005 2009 2011 2013 2014 2017 2020 2021 2022 2023
Voucher strategies				
3.H.01	Inspect SHA-owned properties: Allows SHA staff, rather than a third-	2000 MTW Plan	Activated in 2001	2000-R

Strategy	Description	First identified	Current status	Year(s) updated
	party entity, to complete inspections of SHA owned properties.			
3.H.02	Fines for no-shows at inspections: Impose fines on the landlord or participant for failing to be present at scheduled inspections.	2005 MTW Plan	Not yet implemented	2005-R 2006
3.H.03	Reclassified as 3.A.03			
3.H.04	Self-certification for minor fails: Self-certification by landlords of correction of minor failed inspection items.	2010 MTW Plan	Activated in 2021	2022
Public housing strategies				
3.P.01	Reclassified as 3.A.03			

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #5: Local leases

Status

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

Description

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

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

Approved strategies in this activity are as below.

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 2022 Closed in 2023	2005 2005-R 2022 2023
Voucher strategies				
5.H.01 (Recategorized from 9.H.06 in 2021)	HAP contracts: SHA may modify the HAP contract and Tenancy Addendum.	2000 MTW Plan	Activated in 2000	2000-R 2021 2022
Public housing strategies				
5.P.01	Local lease: SHA may implement its own lease, incorporating industry best practices.	2001 MTW Plan	Activated in 2011	2004 2005 2005-R 2009 2010 2011
5.P.02	Grievance procedures: Modify grievance policies to require tenants to remedy lease violations and be up to date in their rent payments before granting a grievance hearing for proposed tenancy terminations.	2008 MTW Plan	Closed in 2023	2023
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

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #8: Special purpose housing use

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	First implemented	Year(s) updated
Agency-wide strategies				
8.A.01	Conditional housing: Housing program for those who do not currently quite meet SHA's minimum qualifications	2000 MTW Plan	Not yet implemented	None
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	2000 MTW Plan	Activated in 2011	2001 2008 2010

Strategy	Description	First identified	First implemented	Year(s) updated
	designate properties/units for specific purposes such as elderly.			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	Closed in 2023	2023
8.P.05	Pet-free environments: Establish pet-free environments in connection with selected service enriched housing.	2009 MTW Plan	Closed in 2023	2023

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #9: Project-based program

Status

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

Description

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

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

Approved strategies in this activity are as below:

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
9.H.01	Cost-benefit inspection approach: Allows SHA to establish local inspection protocol, including self-certification that inspection standards are met at time of move in for mid-year turnovers	1999 MTW Plan	Activated in 2004 Inactivated in 2021	2020
9.H.02	Assets in rent calculation: Only calculate income on assets declared as valuing \$5,000 or more.	2000 MTW Plan	Activated in 2005	None
9.H.03	Choice offered at beginning (no exit vouchers): Housing choice is offered at the beginning of the project-based admissions process (by nature of site-specific waiting lists); exit vouchers are not offered.	2000 MTW Plan	Activated in 2000	2005
9.H.04	Contract term: Project-based commitments renewable up to 40 years.	2000 MTW Plan	Activated in 2000	None
9.H.05	Eligible unit types: Modify the types of housing accepted under a project-based contract - allows shared housing and transitional housing.	2000 MTW Plan	Activated in 2002	None
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 2025
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

Strategy	Description	First identified	Status	Year(s) updated
9.H.11	Rent cap-30% of income: Project-based participants cannot pay more than 30% of their adjusted income for rent and utilities.	2000 MTW Plan	Activated in 2000 Inactivated in 2011	2011
9.H.12	Streamlined admissions: SHA may streamline and centralize applications and waiting list processes for project-based HCV units.	2000 MTW Plan	Activated in 2000	2010-R 2017
9.H.13	Competitive allocation process: Commit vouchers to the City's competitive process for housing funding.	2004 MTW Plan	Activated in 2005 Inactivated in 2011	2011
9.H.14	Payment standards for SHA units: Allows higher than Voucher Payment Standard for SHA-operated project-based units if needed to support the project budget (while still taking into account rent reasonableness).	2004 MTW Plan	Activated in 2004	2005-R
9.H.15	Subsidy cap in replacement units: Cap subsidy at levels affordable to households at 30% AMI in project-based HOPE VI replacement units where SHA also contributed capital to write-down the unit's affordability to that level.	2004 MTW Plan	Activated in 2004 Inactivated in 2011	2011
9.H.16	Admissions-admit people with felony records under certain conditions: Allows for the admission into Project-based Voucher units of people with Class B and Class C felonies on their records subject to time-limited sex offender registration requirements who do not, in the opinion of the owner of the subsidized units, constitute a threat to others.	2005 MTW Plan	Activated in 2005	2005-R
9.H.17	Program-based vouchers: Allocate floating voucher subsidy to a defined group of units or properties.	2003 MTW Plan	Activated in 2004	2003-R
9.H.18	Provider-based vouchers: Provide vouchers to selected agencies to couple with intensive supportive services. The agency master leases units and subleases to tenants.	2007 MTW Plan	Activated in 2007	None
9.H.19	Streamlined admissions and recertifications: SHA may streamline admissions and recertification processes for provider-based and project-based programs.	2009 MTW Plan	Not yet implemented	None
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

2025 Updates

None.

Planned non-significant changes

SHA is providing one non-significant change to a strategy in Activity 9:

- *Strategy 9.H.09: Percent of vouchers that may be project-based*

SHA is authorized to set its own cap on the percentage of vouchers which are project-based. In 2000, SHA set the cap at 25 percent and raised to no more than 35 percent in 2016. Since raising the cap in 2016, SHA has increased its usage of PBVs by more than a third by placing vouchers in partner-owned units and, increasingly, in SHA's rehabbed and redeveloped properties. Partner-owned units have primarily been awarded to existing Permanent Supportive Housing projects in partnership with the City of Seattle Housing Levy and represent a key component in Seattle's efforts to combat homelessness and expand housing choice for low-income households in Seattle. SHA has already committed additional project-based vouchers to the newest Seattle Housing Levy and therefore will be raising the cap of applicable MTW vouchers that may be project based to no more than 40 percent in this Plan to continue to support those efforts.

The last time SHA provided an update to this strategy was prior to the roll out of HOTMA which made a number of changes, including the regulatory references and the calculation methodology for the PBV Cap. Therefore, SHA is updating the regulatory waivers to 24 CFR 983.6 and 983.9 as necessary. SHA is also clarifying that its local calculation methodology includes all MTW vouchers except those that were allocated for the purpose of replacing units previously HUD subsidized by other means (typically public housing).

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #10: Local rent policy

Status

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

Description

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Current status	Year(s) updated
Agency-wide strategies				
10.A.01	Streamlined income verification: SHA may adopt local rules-regarding the length of time income verification is considered valid and a local verification hierarchy.	2014 MTW Plan	Activated in 2014	2020 2021 2022
10.A.02 (Recategorized from 10.P.23 in 2021)	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2014 MTW Plan	Activated in 2015	2018 2019 2021
10.A.03	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	Activated in 2023	None
10.A.04	Streamlined medical deduction: Seattle Housing Authority will allow self-certification of medical expenses	2010 MTW Plan	Activated in 2011	2015 2023-R 2025
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 2025
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	2000 MTW Plan	Activated in 2005	2003 2005

Strategy	Description	First identified	Current status	Year(s) updated
	Income, up from HUD's standard 30% of Adjusted Income.			
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 2021
10.H.05	Absolute minimum rent: The minimum rent for all residents will be established annually by SHA. No rent will be reduced below the minimum rent amount by a utility allowance.	2003 MTW Plan	Not yet implemented	2005
10.H.06	Payment standard-SROs: SHA may use the studio payment standard for SRO units.	2003 MTW Plan	Activated in 2003	None
10.H.07	Tenant-based self-sufficiency incentives: Rent policies to foster self-sufficiency among employable households, including income disregards proportional to payroll tax; allowances for employment-related expenses; intensive employment services coupled with time limits; locally defined hardship waivers.	2005 MTW Plan	Not yet implemented	None
10.H.08	Imputed income from TANF: Impute TANF income if household appears eligible and has not documented ineligibility. TANF not counted toward income if family is sanctioned.	2006 MTW Plan	Not yet implemented	None
10.H.09	Rent reasonableness streamlining: Allows SHA to streamline rent reasonable determinations, including automatic annual updates and shared housing.	2006 MTW Plan	Activated in 2016	2008 2016 2017 2018 2021
10.H.10	Income reviews conducted for households with 100% elderly and/or disabled adults only every three years (within a period of 40 months).	2009 MTW Plan	Activated in 2010	2013 2014 2015 2020 2021
10.H.11	Recategorized as 13.H.02. See Activity #13.			
10.H.12	Recategorized as 10.A.05 in 2023-R.			
10.H.13	Recategorized as 10.A.04 in 2023.			

Strategy	Description	First identified	Current status	Year(s) updated
10.H.14	Simplified utility allowance schedule: HCV participants' rent will be adjusted for a Utility Estimate based on the number of bedrooms (defined as the lower of voucher size or actual unit size) and tenant responsibility for payment of energy, heat, and sewer/water under their lease, with a proration for energy-efficient units.	2011 MTW Plan	Activated in 2011	2023
10.H.15	Disregard of student financial aid as income: SHA may disregard student financial aid as income.	2019 MTW Plan	Activated in 2019	2020
Public housing strategies				
10.P.01	Absolute minimum rent: Tenants pay a minimum rent (\$50 or more) even if utility allowance would normally result in a lower rental payment or reimbursement.	2000 MTW Plan	Activated in 2001	2005
10.P.02	Earned Income Disregard: HUD's Earned Income Disregard is not offered to public housing residents.	2000 MTW Plan	Activated in 2001	2000 2001
10.P.03	Income reviews conducted for households with 100% elderly and/or disabled adults only every three years (within a period of 40 months).	2001 MTW Plan	Activated in 2004	2005 2013 2014 2015 2020 2021
10.P.04	Rent freezes: Voluntary rent policy freezes rent in two-year intervals.	2000 MTW Plan	Activated in 2000	2000 2001 2005
10.P.05	TANF rent calculation: Calculate TANF participant rent on 25% of gross income.	2000 MTW Plan	Activated in 2000	2000 2001 2005
10.P.06	Tenant Trust Accounts: A portion of working public housing residents' income may be deposited in an escrow account for use toward self-sufficiency purposes.	2000 MTW Plan	Activated in 2000 Inactivated in 2012	2000 2001 2005 2010 2012
10.P.07	Ceiling rent two-year time limit: When a tenant's calculated rent reaches the ceiling rent for their unit, the rent will not be increased beyond the rent ceiling for 24 months.	2000 MTW Plan	Activated in 2001 Inactivated in 2012	2000 2001 2005 2012
10.P.08	Impute income from public benefits: SHA may impute income in rent calculation for tenants declaring no income who appear eligible for but decline to collect cash benefits	2000 Annual Plan	Activated in 2000	2000 2005 2013
10.P.09	Partners develop separate rent policies: Allow partner providers and HOPE VI communities to develop separate rent policies that are in line with program goals and/or to streamline.	2005 MTW Plan	Not yet implemented	None

Strategy	Description	First identified	Current status	Year(s) updated
10.P.10	Studio vs. one-bedroom: Differentiate rents for studios vs. one-bedroom units.	2005 MTW Plan	Not yet implemented	2005
10.P.11	Utility allowance-self-sufficiency and resource conservation: Change utility allowance where metering permits to encourage self-sufficiency and resource conservation.	2005 MTW Plan	Not yet implemented	None
10.P.12	Utility allowance-schedule: SHA may change utility allowances on a schedule different for current residents and new move-ins.	2008 MTW Plan	Activated in 2008	None
10.P.13	Streamlined for fixed income: Further streamline rent policy and certification process for fixed income households, including self-certification of medical expenses.	2009 MTW Plan	Activated in 2014	2015
10.P.14	Streamlined rent policy for partnership units: Allow non-profit partners operating public housing units to implement simplified rent policies.	2009 MTW Plan	Not yet implemented	None
10.P.15	Utility allowance: frequency of utility allowance updates: SHA may revise the schedule for reviewing and updating utility allowances due to fluctuations in utility rates.	2009 MTW Plan	Activated in 2010	2010 2018
10.P.16	Utility allowance: local benchmark: SHA may develop new benchmarks for "a reasonable use of utilities by an energy conservative household" - the standard by which utility allowance are calculated.	2009 MTW Plan	Not yet implemented	None
10.P.17	SSHP rent policy: Rents in SSHP units will be one of five flat rents based on the tenant's percentage of Area Median Income, with annual 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	2013 MTW Plan	Activated in 2013	2014

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

2025 Updates

SHA has one technical correction to a strategy in Activity 10.

- *Strategy 10.A.05: Asset strategy*

This strategy was erroneously labeled Strategy 10.A.04 in the 2024 Plan. It is being relabeled as Strategy 10.A.05 as per changes in the 2023 MTW Report.

Planned non-significant changes

SHA has two non-significant changes to strategies in Activity 10:

- *Strategy 10.A.04: Streamlined medical deduction*

HOTMA changes some definitions of qualifying medical expenses. SHA will continue to use local definitions of qualifying medical expenses as outlined in its ACOP and Admin Plan.

- *Strategy 10.A.05: Asset income threshold*

HOTMA changes the way that income from assets is calculated for both eligibility and continued occupancy, requiring that imputed asset income be calculated for specific assets when specific criteria are met. HOTMA also requires a full verification of a family's assets every three years. SHA will keep the current method of asset income calculation, which is to determine asset income based on the greater of actual or imputed income from the assets as outlined in the ACOP and Admin Plan, as well as continuing to allow self-certification of assets up to \$50,000.

Planned changes to metrics/data collection

None.

Planned significant changes

While SHA is **not proposing changes to how household income is determined**, because related federal rules have changed or are soon changing¹¹, SHA is adding the following new strategy to its already approved *MTW Activity 10: Local rent policy* to update its authorizations to retain current income determination policies in light of revised federal regulations.

Strategy number	Description
MTW Strategy 10.A.06: Streamlined local income determination	SHA may adopt local rules regarding the determination of household income for the purposes of eligibility, Total Tenant Portion and tenant rent.

Since obtaining MTW authority to establish local rent policy in 2000, SHA has utilized its MTW authority to adopt a comprehensive and interconnected set of policies and to make several refinements to streamline income calculation processes. The processes for determining income and rent in subsidized housing programs are complex and burdensome for participants and staff, and SHA's current rent and income calculation processes are designed to work together to simplify and streamline the processes and balance with other policies and investments. Changing any one element would have significant ripple effects.

The ability to maintain current policies will promote the MTW goal of administrative efficiency by not increasing the workload of staff or causing confusion or stress for tenants due to the changes. To enable this, SHA clarified in its approved 2024 MTW Plan that it intends to maintain consistency with its existing rent and income determination policies and procedures. Because there are elements of SHA's rent and income policies that were previously consistent with federal regulations, they had not been called out in Activity 10. Therefore, SHA is adding Strategy 10.A.06, the current implementation of which includes addressing the following provisions of Section 102 of the Housing Opportunities Through Modernization Act of 2016:

1. HOTMA requires PHAs to determine the annual income based on the previous 12-month period. SHA will maintain its current methodology for calculating income by using current family income documentation to project income over the next 12 months.
2. HOTMA makes changes to the deduction amounts for dependents and elderly/disabled family members, as well as the threshold for unreimbursed health and medical expenses. HOTMA also institutes inflationary adjustments for these same deductions as

¹¹ Stemming from the implementation of the Housing Opportunities Through Modernization Act (HOTMA) of 2016.

well as selected income exclusions. SHA will maintain the deduction policies, amounts and thresholds as outlined in the Admissions and Continued Occupancy Policy and HCV Administrative Plan.

3. HOTMA sets specific policies for when interim reviews should be conducted for income increases. SHA has local interim policies that previously did not require MTW approval. The agency will maintain its interim review policies for both increases and decreases as outlined in the ACOP and Admin Plan.

As these policies are all currently in place, there is no implementation schedule needed for this strategy. SHA will take a comprehensive look at opportunities to decrease the administrative burdens of its income and rent determination processes and taking in to account the associated ripple effects in the future. SHA may make a comprehensive set of recommendation, make local adjustments within its approved MTW strategies and/or adopt selected HOTMA policies.

For this strategy, SHA is citing the following authorizations: Attachment C D(3)(a), C(4), C(11), D(1)(c) and D(2)(a), including 24 CFR 5.609, 24 CFR 5.611, 24 CFR 960.257 and 24 CFR 982.516.

MTW Activity #11: Resource conservation

Status

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

Description

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

Approved strategies in this activity are as below.

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

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #12: Waiting lists, preferences and admissions

Status

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

Description

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
12.A.01	Local preferences: SHA may establish local preferences for federal housing programs.	2002 MTW Plan	Activated in 2002 Inactivated in 2011	None
12.A.02 (Recategorized from 12.H.06 in 2021)	Streamlined eligibility verification: Streamline eligibility verification standards and processes, including allowing income verifications to be valid for up to 180 days.	2009 MTW Plan	Activated in 2013	2020 2021
Voucher strategies				
12.H.01	Recategorized as 9.H.20			
12.H.02	Voucher distribution through service provider agencies: Up to 30% of SHA's tenant-based vouchers may be made available to local nonprofits, transitional housing providers, and divisions of local government that provide direct services for use by their clients without regard to their client's position on SHA's waiting list.	2000 MTW Plan	Activated in 2002	2001 2003

Strategy	Description	First identified	Status	Year(s) updated
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
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	Closed in 2023	2023
12.P.06	Seattle Senior Housing Program (SSHP) waiting list policy: SHA will not distinguish between senior and non-senior disabled households in filling vacancies in the SSHP portfolio based on bedroom size. The SSHP program will maintain a 90 percent senior, 10 percent non-senior disabled ratio at the AMP level.	2013 MTW Plan	Activated in 2013 Inactivated in 2023	2023

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #13: Homeownership and graduation from subsidy

Status

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

Description

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
13.A.01	Down payment assistance: Allocate MTW funds to offer a local down payment assistance program.	2004 MTW Plan	Activated in 2004 Reactivated in 2021	2004-R 2007 2021 2022
13.A.02	Savings match incentive: Program that matches savings and provides financial information for participating public housing and HCV households leaving subsidized housing for	2012 MTW Plan	Activated in 2013 Reactivated in 2021	2021 2022

Strategy	Description	First identified	Status	Year(s) updated
	homeownership or unsubsidized rental units.			
13.A.03 (formerly 13.H.01)	Mortgage assistance: Seattle Housing Authority may develop a homeownership program that includes mortgage subsidy.	2008 MTW Plan	Activated in 2021	2021
Voucher strategies				
13.H.01	Recategorized as 13.A.03 (2021)			
13.H.02	180-day EOP clock: The 180-day End of Participation “clock” due to income will start when a family’s Housing Assistance Payment (HAP) reaches \$50 or less.	2010 MTW Plan	Activated in 2010	2012 2021
Public housing strategies				
13.P.01	End of Participation for higher income households in mixed-income communities: In mixed-income communities, SHA will remove subsidy when household income exceeds the established limit for six months.	2012 MTW Plan	Activated in 2016	2017 2018
13.P.02	Incentives for positive tenant departures and housing stability: SHA may provide a financial incentive to public housing households who vacate their unit in a manner consistent with SHA unit guidelines.	2019 MTW Plan	Activated in 2019	None

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #15: Combined program management

Status

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

Description

In some of its communities/portfolios, SHA co-locates units funded through project-based vouchers and low-income public housing. Combining program management and policies for both of these types of units (referred to as Streamlined Low Income Housing Program, or SLIHP, units) within the same community/portfolio reduces costs by eliminating redundancies, including duplicative rent reviews and inspections. It also avoids unnecessary disparities between tenants of the two different types of units. SHA's current implementation of this activity allows for all units subsidized by project-based housing choice vouchers to be operated like public housing subsidized units located within SHA properties but not necessarily co-located with public housing.. This streamlined approach includes transfer policies as well as acceptance of slight differences (generally less than \$1) in rent calculation caused by different data systems of record for vouchers and public housing.

Approved strategies in this activity are as below.

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

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #18: Short-term assistance

Status

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

Description

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

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
18.A.01	Interagency Domestic Violence Transfer Program: SHA may join an inter-jurisdictional transfer program to assist residents and program participants who become victims of domestic violence.	2014 MTW Plan	Closed in 2023	2023
18.A.02	Emergency assistance for housing stability: SHA may disregard one-time or short-term emergency assistance from other sources to prevent households from losing their housing in determining eligibility and rent contribution.	2014 MTW Plan	Activated in 2014	None
18.A.03 (Recategorized from 18.H.01 in 2021)	Short-Term Rental Assistance: SHA may provide funding for short-term shallow rental assistance through cooperative community initiatives to help families, students, adults, and youth obtain and retain housing.	2013 MTW Plan	Activated in 2013	2014 2015 2016 2021
Voucher strategies				
18.H.01	Recategorized as 18.A.03 (2021)			

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #19: Mobility and portability

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Voucher strategies				
19.H.01	Limiting portability in high-cost areas: SHA may deny requests for portability moves to another jurisdiction when the receiving housing authority intends to administer rather than absorb the voucher and the resulting payment standard would be higher than SHA's payment standard.	2013 MTW Plan	Closed in 2023	2023
19.H.02	Housing choice moving cost assistance and support: SHA may develop a program for voucher households to provide assistance with housing search, access supplements, deposits and similar costs, outreach and incentives for landlord participation such as risk reduction funds and access supplements.	2014 MTW Plan	Activated in 2015	2015 2017 2018 2022
19.H.03	One-year residency requirement before port out: SHA may require that Housing Choice Voucher households live in Seattle for one year before	2015 MTW Plan	Activated in 2015	None

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

2025 Updates

None.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

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

Status

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

Description

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

Approved strategies in this activity are as below.

Strategy	Description	First identified	Status	Year(s) updated
Agency-wide strategies				
20.A.01	Use of funds for local non-traditional affordable housing: SHA may use federal funds to develop, capitably 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 households with at least one member returning to the community from incarceration.	2024 MTW Plan	Activated in 2024	None

2025 Updates

None.

Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

MTW Activity #22: Housing assistance for school stability

Status

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

Description

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

SHA provides housing assistance to participating families, using multiple means as available, including prioritizing preference for participating families for admission into units within the selected neighborhood, as well as tenant-based vouchers for participating families, with use limited to the school neighborhood. For new participants, 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 for new participants 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	2025

2025 Updates

SHA stopped enrolling new households in Home from School at the end of 2023. SHA continues to provide housing assistance to families who leased up through the program.

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

B. Not-yet-implemented activities

MTW Activity #21: Self-sufficiency assessment and plan

Status

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

Description

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

Approved strategies in this activity are as below.

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

Reactivation

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

C. Activities on hold

MTW Activity #4: Investment policies

Status

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

Description

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

Approved strategies in this activity are as below.

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

Reactivation

SHA annually assesses potential investments to determine which investment policies are most beneficial. MTW alternate investment policies were not needed in 2019, when the activity was last updated. 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.

Note: HUD has requested that SHA delete any reference to "MTW single fund" or "MTW Block Grant" in the MTW Plan. Since this activity has been closed out, the language will remain intact in this section only.

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	None

Strategy	Description	First identified	Status	Year(s) updated
			Closed out in 2013	

Reason for closing

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

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

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

MTW Activity #17: Performance standards

Status

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

Description

Approved strategies in this activity are as below.

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

Reason for closing

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

V. Planned application of MTW funds

A. Planned application of MTW funds

i. Estimated sources of MTW funds

FDS line item number	FDS line item name	Dollar amount
70500 (70300+70400)	Total tenant revenue	\$ 16,865,000
70600	HUD PHA operating grants	\$ 275,290,000
70610	Capital grants	\$ 16,841,000
70700 (70710+70720+70730+70740+70750)	Total fee revenue	\$ 0
71100+72000	Interest income	\$ 691,000
71600	Gain or loss on sale of capital assets	N/A ¹²
71200+71300+71310+71400+71500	Other income	\$ 1,164,000
70000	Total revenue	\$ 310,851,000

ii. Estimated application of MTW funds

FDS line item number	FDS line item name	Dollar amount
91000 (91100+91200+91400+91500+91600+ 91700+91800+91900)	Total operating - Administrative	\$ 42,288,000
91300+91310+92000	Management fee expense	\$ 10,402,000
91810	Allocated overhead	N/A
92500 (92100+92200+92300+92400)	Total tenant services	\$ 264,000
93000 (93100+93600+93200+93300+93400+ 93800)	Total utilities	\$ 6,523,000
93500+93700	Labor	N/A
94000 (94100+94200+94300+94500)	Total ordinary maintenance	\$ 17,425,000
95000 (95100+95200+95300+95500)	Total protective services	\$ 180,000
96100 (96110+96120+96130+96140)	Total insurance premiums	\$ 2,688,000
96000 (96200+96210+96300+96400+96500+ 96600+96800)	Total other general expenses	\$ 1,809,000
96700 (96710+96720+96730)	Total interest expense & amortization cost	N/A
97100+97200	Total extraordinary maintenance	\$0
97300+97350	HAP + HAP portability-in	\$ 146,413,000

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

FDS line item number	FDS line item name	Dollar amount
97400	Depreciation expense	N/A
97500+97600+97700+97800	All other expense	\$ 3,763,000
90000	Total expenses	\$ 231,755,000

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

The Estimated MTW Sources exceed Estimated MTW Uses primarily because the Estimated Application of MTW Funds table excludes \$57.4 million in the following eligible uses:

- \$21.6 million designated for MTW-funded capital projects, despite capital being listed as a source.
- \$20.5 million that SHA plans to spend on local housing and program development, including the Northgate redevelopment project.
- \$15.3 million that SHA plans to allocate to support the Community Services and JobLink divisions. These divisions provide vital support to low-income housing residents including community building, digital equity initiatives, academic support for youth and families and connecting residents to education and career pathways to enhance financial and economic security among SHA public housing residents.
- \$7.1 million designated for the operation of parks in low-income communities, the administration of SHA's housing development program and fleet replacement.
- \$14.5 million designated for supporting Local, Non-Traditional housing programs, covering grant administrative fees and unplanned increases in labor and overhead.

iii. Description of planned application of MTW funding flexibility

Planned application of MTW funding flexibility
<p>Seattle Housing Authority established itself as an MTW agency with federal funding flexibility in 1999 under the original MTW Agreement and continues to use funding flexibility under the Amended and Restated MTW Agreement. As part of the 2024 Appropriations Bill, the SHA's MTW Agreement has been extended through 2038. The MTW program provides regulatory and funding flexibility in the following ways:</p> <ul style="list-style-type: none"> • 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. • Seattle Housing Authority exercises its MTW authority to move funds and project cash flow among projects and programs, as the agency deems necessary to further its mission and strategic plan, cost objectives, statutory compliance and local housing needs. <p>The agency analyzes its housing, rental assistance, tenant and community services, sustainability services, administrative and capital needs annually through the budget process to determine the level of service and resource needs to meet the agency's strategic objectives. Seattle Housing Authority's funding flexibility allows allocation of</p>

Planned application of MTW funding flexibility

federal revenues among Seattle Housing Authority's programs. This enables the agency to balance mixes of housing types, tenant services, administrative support and capital investments in preservation and development of housing which serves people with low incomes. It also enables the agency to tailor resource allocation to best achieve our cost, program and strategic objectives and therefore maximize our services to low-income residents and applicants to meet their varied needs.

The bulk of Seattle Housing Authority's use of its MTW funding flexibility is focused on activities in MTW communities, support of low-income housing development and preservation, and services for Low-Income Public Housing and Housing Choice Voucher participants. Examples are:

- Community supportive services, including deepening commitment to youth education by expanding external partnerships and focusing on youth engagement by developing emotional supports and pro-social behaviors. Continue youth tutoring, job training and betterment activities for high school youth, aging in place services, and leverage health related programs that provide participants with access to critical health care and stability services. Continue to support SHA residents and participants on their journey toward self-sufficiency and evaluate ways to improve housing stability.
- Parks and open spaces for our low-income communities with play opportunities for children, active and team sports activities for youth and passive and active exercise options for all.
- Planning, pre-development, construction and construction services for asset preservation, public housing redevelopment and opportunities to increase affordable housing for low-income people.

MTW funding flexibility enables Seattle Housing Authority to:

- Evaluate and find long term financial stability options to strategically address capital and operating needs and environmental sustainability of SHA's communities.
- Increase security at communities, enhance security systems and improve safety and security.
- Improve housing quality through unit repairs and unit upgrades; reduce workorder backlogs resulted from the disruption of COVID-19.
- Improve the support for residents struggling with clutter in their units.
- Increase resident support to better connect them with services.
- Enhance tenant services and support aging-in-place initiatives.
- Strengthen communication with residents and better inform them about planned projects.
- Introduce a new role to support the Employee Total Rewards program and improve staff benefits communication.
- Expand and improve access to mediation services for housing stability.

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

Original funding source	Beginning of 2025 - unspent balances	Planned application of PHA unspent funds during 2025
HCV HAP*	\$ 0	\$ 0
HCV admin fee		\$ 0
PH operating subsidy	\$ 3,448,521	\$ 0
Total:	\$ 3,448,521	\$ 0

Description:

SHA projects very low levels of unspent funds in 2025 and, therefore, has not designated related expenditures.

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

C. Local asset management plan

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

No materials changes have been made to the LAMP. The Agency has removed extraneous language from the LAMP. This language was not substantive or related to LAMP requirements, including the difference between SHA's LAMP and standard HUD requirements. The intent of this update is to simplify the document, so it better captures the Agency's approach.

The LAMP was also updated, as is done annually, to reflect the Indirect Service Fees for the Plan year. Pursuant to the requirements of OMB Super Circular Part 200, the Indirect Service Fee is determined in a reasonable and consistent manner based on projected total units and leased vouchers. The IDSF is a per-housing-unit or per-leased-voucher fee per month charged to each program. For the 2025 budget, the per-unit-month (PUM) cost will be \$69.76 for housing units and \$28.96 for leased vouchers.

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

D. Rental Assistance Demonstration participation

i. Description of Rental Assistance Demonstration (RAD) participation

Rental Assistance Demonstration (RAD) participation	
	N/A

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

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

N/A

VII. Administrative

A. Board resolution and certifications of compliance

SHA's Board of Commissioners voted to adopt the Annual MTW Plan on October 14, 2024. The signed Resolution, Certifications of Compliance and lobbying disclosure form are included in Appendix C of the MTW Plan. The signed Certification of Consistency with the Consolidated Plan (Form HUD-2991) is also included in this appendix.

B. Documentation of public process

The public comment period for the MTW Annual Plan began on August 30, 2024 and concluded on September 30, 2024. SHA conducted outreach to participants and the public throughout the public comment period to make them aware of the availability of the Plan and ability to provide public comment, including posting in the *Daily Journal of Commerce*, writing articles for *The Voice* (a resident e-newsletter that reaches thousands) and posting flyers in buildings and common areas. The draft Plan was publicly available on SHA's website (www.seattlehousing.org) and hard copies were available by request. A public hearing was held on September 16, 2024 at SHA's Central Office. Language interpretation and disability accommodations were available by request. Staff reviewed all comments received during this process thoroughly; no changes were made to the MTW Plan as a result of these comments.

Documentation of the public process was be presented to the Board of Commissioners on October 7, 2024 and can be made available to HUD upon request.

C. Planned and ongoing evaluations

SHA is not currently engaged in any third-party agency-wide evaluations of its MTW program. No external MTW evaluations are planned for 2025.

D. Lobbying disclosures

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

Appendix A: Planned existing project-based vouchers

The below table consists of the tenant-based vouchers that SHA is currently project-basing in 2025. Some properties may have more than one existing AHAP/HAP contract with SHA and may be listed two or more times. This section meets the requirements prescribed in HUD Form 50900 Section II.A.iv. "Planned Existing Project Based Vouchers."

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
2nd & 3rd	29	Leased	No	Permanent supportive housing
13 th & Fir	92	Leased	No	Affordable housing
104 th St. Townhomes	3	Leased	No	Affordable housing
A Place of Our Own	19	Leased	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	Leased	No	Enhanced behavioral health services
Aldercrest	8	Leased	No	Affordable housing
Almquist Apartments	52	Leased	No	Permanent supportive housing
Arbora Court	40	Leased	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	Leased	No	Affordable housing
Aurora House	30	Leased	No	Permanent supportive housing
Avalon Place	9	Leased	No	Permanent supportive housing
Baldwin Apartments	15	Leased	No	Affordable housing
Bayview Tower	37	Leased	No	Affordable housing
Beacon House	6	Leased	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	Leased	No	Affordable housing
Bergan Place	2	Leased	No	Homeless young adults
Bergan Place	8	Leased	No	Affordable housing
Brettler Family Place I	51	Leased	No	Service-enriched for homeless families (with at least one minor)
Brettler Family Place II	21	Leased	No	Service-enriched for homeless families (with at least one minor)
Broadway Crossing	10	Leased	No	Service-enriched for homeless individuals
Broadway Crossing	9	Leased	No	Service-enriched for homeless families with at least one minor
Bush Hotel	7	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Casa Pacifica	6	Leased	No	Affordable housing
Casa Pacifica	5	Leased	No	Affordable housing
Cascade Court Apartments	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Cascade Court Apartments	5	Leased	No	Affordable housing
Cate Apartments	10	Leased	No	Affordable housing
Cate Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Cedar Crossing	7	Leased	No	Affordable housing
Centerwood Apartments	2	Leased	No	Affordable housing
Cluster SMH	14	Leased	No	Enhanced behavioral health services
Colonial Gardens	20	Leased	No	Affordable housing
Columbia Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	16	Leased	No	Affordable housing
Compass Broadview	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	Leased	No	Permanent supportive housing
Compass on Dexter	36	Leased	No	Service-enriched for homeless individuals
Council House	30	Leased	No	Senior housing
Crestwood Place Apartments	6	Leased	No	Affordable housing
Croft Place	7	Leased	No	Affordable housing
David Colwell Building	25	Leased	No	Affordable housing
Dekko Place	5	Leased	No	Affordable housing
Delridge Heights Apartments	3	Leased	No	Affordable housing
Delridge Triplexes	6	Leased	No	Affordable housing
Denny Park Apartments	5	Leased	No	Affordable housing
Denny Park Apartments	8	Leased	No	Service-enriched for homeless families (with at least one minor)
DESC	12	Leased	No	Enhanced behavioral health services
Eastern Hotel	4	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Eastlake Supportive Housing	25	Leased	No	Permanent supportive housing
Emerald City Commons	12	Leased	No	Affordable housing
Ernestine Anderson Place	33	Leased	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	Leased	No	Permanent supportive housing
Evans House	49	Leased	No	Permanent supportive housing
Fir Street Apartments	7	Leased	No	Affordable housing
First Place	4	Leased	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	Leased	No	Senior housing
Four Freedoms House	126	Leased	No	Senior housing
Fremont Solstice Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	Leased	No	Service-enriched for homeless families (with at least one minor)
The Genessee	17	Leased	No	Affordable housing
The Genessee	3	Leased	No	Service-enriched for homeless families (with at least one minor)
Golden Sunset	45	Leased	No	Affordable housing
Gossett Place	12	Leased	No	Permanent supportive housing
Gossett Place	28	Leased	No	Permanent supportive housing
High Point	100	Leased	No	Affordable housing
Hilltop House	30	Leased	No	Senior housing
Hinoki Apartments	82	Leased	No	Affordable housing
Hoa Mai Gardens	70	Leased	No	Affordable housing
Hobson Place	26	Leased	No	Affordable housing
Hobson Place	63	Leased	No	Permanent supportive housing
Holden Manor	1	Leased	No	Affordable housing
Holden Street Family Housing (Saint Teresita del Niño Jesus)	25	Leased	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	Leased	No	Affordable housing
Humphrey House	81	Leased	No	Permanent supportive housing
Imani Village	8	Leased	No	Service-enriched for homeless families (with at least one minor)

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Jefferson Terrace	283	Leased	No	Affordable housing
John Fox Place	26	Leased	No	Affordable housing
Josephinum Apartments	25	Leased	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	Leased	No	Service-enriched for homeless individuals
Judkins Park	4	Leased	No	Affordable housing
Judkins Park	4	Leased	No	Service-enriched for homeless families (with at least one minor)
The Julie Apartments	20	Leased	No	Affordable housing
The Julie Apartments	2	Leased	No	Affordable housing
The Julie Apartments	6	Leased	No	Service-enriched for homeless individuals
Juniper	50	Leased	No	Affordable housing
The Karlstrom	17	Leased	No	Service-enriched for homeless individuals
Kebero Court	83	Leased	No	Affordable housing
Kenyon Housing	18	Leased	No	Permanent supportive housing
Kerner-Scott House	15	Leased	No	Permanent supportive housing
Kingway Apartments	16	Leased	No	Service-enriched for homeless families (with at least one minor)
Kristin Benson Place	77	Leased	No	Permanent supportive housing
Lake City Commons	15	Leased	No	Affordable housing
Lake Washington Apartments	37	Leased	No	Affordable housing
Lakeview Apartments	15	Leased	No	Affordable housing
Lakeview Apartments	5	Leased	No	Affordable housing
Lakeview Apartments	6	Leased	No	Affordable housing
Legacy House	22	Leased	No	Senior housing
Leschi House	35	Leased	No	Senior housing
Lewiston Apartments	28	Leased	No	Permanent supportive housing
Lincoln Apartments	4	Leased	No	Affordable housing
Lyon Building	12	Leased	No	Permanent supportive housing
Main Street Apartments	2	Leased	No	Affordable housing
Main Street Place	8	Leased	No	Affordable housing
Marion West	25	Leased	No	Service-enriched for homeless individuals

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Market Terrace	5	Leased	No	Affordable housing
Martin Court	28	Leased	No	Service-enriched for homeless individuals
Martin Court	13	Leased	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Jr. Apartments	10	Leased	No	Affordable housing
Martina Apartments (fka CHS Greenwood)	66	Leased	No	Permanent supportive housing
Mary Avenue Townhomes	8	Leased	No	Affordable housing
McDermott Place	15	Leased	No	Permanent supportive housing
McDermott Place	10	Leased	No	Permanent supportive housing
Meadowbrook View Apartments	15	Leased	No	Service-enriched for homeless families (with at least one minor)
Mercer Court	3	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	5	Leased	No	Affordable housing
MLK Family Housing (Katharine's Place)	10	Leased	No	Service-enriched for homeless families (with at least one minor)
MLK Properties	6	Leased	No	Affordable housing
Monica's Village Place	38	Leased	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	Leased	No	Affordable housing
Morrison Hotel	190	Leased	No	Permanent supportive housing
Muslim Housing	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	4	Leased	No	Service-enriched for homeless families (with at least one minor)
Nihonmachi Terrace	20	Leased	No	Affordable housing
Nihonmachi Terrace	5	Leased	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	Leased	No	Affordable housing
The North Star	20	Leased	No	Affordable housing
NP Hotel	5	Leased	No	Affordable housing
Oleta Apartments	6	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
One Community Commons	5	Leased	No	Service-enriched for homeless individuals
One Community Commons	7	Leased	No	Service-enriched for homeless families (with at least one minor)
Opportunity Place	144	Leased	No	Permanent supportive housing
Ozanam House (fka Westlake II)	29	Leased	No	Permanent supportive housing
Pacific Hotel	6	Leased	No	Permanent supportive housing
Palo Studios at the Josephinum	7	Leased	No	Service-enriched for homeless individuals
Pantages Apartments	10	Leased	No	Affordable housing
Pantages Apartments	11	Leased	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	Leased	No	Affordable housing
Park Place	100	Leased	No	Assisted living
Park Place	36	Leased	No	Assisted living
Parker Apartments	8	Leased	No	Affordable housing
Parkview Services	22	Leased	No	Affordable housing for people with disabilities
Pat Williams Apartments	21	Leased	No	Permanent supportive housing
Patricia K. Apartments	12	Leased	No	Permanent supportive housing
Patrick Place	40	Leased	No	Permanent supportive housing
Plymouth on First Hill	77	Leased	No	Permanent supportive housing
Plymouth on Stewart	84	Leased	No	Permanent supportive housing
Plymouth Place	70	Leased	No	Permanent supportive housing
Rainier Vista Northeast	23	Leased	No	Affordable housing
Raven Terrace	50	Leased	No	Affordable housing
Ravenna Springs Properties	14	Leased	No	Affordable housing
Red Cedar	80	Leased	No	Affordable housing
Rise at Yancy	44	Leased	No	Permanent supportive housing
Rose of Lima House	30	Leased	No	Permanent supportive housing
Rose Street Apartments	4	Leased	No	Affordable housing
Salish Landing (fka Lam Bow)	51	Leased	No	Affordable housing
Samaki Commons	12	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Samaki Commons	8	Leased	No	Service-enriched for homeless families (with at least one minor)
Sand Point Campus	18	Leased	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	Leased	No	Permanent supportive housing for families
Sawara	69	Leased	No	Affordable housing
Scattered Sites – Bitterlake portfolio	54	Leased	No	Affordable housing
Scattered Sites – Madison portfolio	17	Leased	No	Affordable housing
Scattered Sites – Northeast Seattle portfolio	38	Leased	No	Affordable housing
Scattered Sites – Northwest Seattle portfolio	47	Leased	No	Affordable housing
Scattered Sites – South Park portfolio	16	Leased	No	Affordable housing
Scattered Sites – South Seattle portfolio	10	Leased	No	Affordable housing
Scattered Sites – University District portfolio	5	Leased	No	Affordable housing
Scattered Sites – West Seattle portfolio	41	Leased	No	Affordable housing
Sea-Mar Family Housing	5	Leased	No	Service-enriched for homeless families (with at least one minor)
SHA - SFD special portfolio	1	Leased	No	Affordable housing
Simons Senior Housing Apartments	88	Leased	No	Permanent supportive housing
South Shore Court (fka Douglas Apartments)	9	Leased	No	Affordable housing
Spruce Street Apartments	10	Leased	No	Affordable housing
Starliter Apartments – Mount Baker	6	Leased	No	Affordable housing
Stone Avenue Townhomes	4	Leased	No	Affordable housing

Property name	# of project-based vouchers	Planned status at end of 2025	RAD?	Description of project
Stone Way Apartments	21	Leased	No	Affordable housing
Stone Way Apartments	14	Leased	No	Service-enriched for homeless families (with at least one minor)
Sylvia Odom's Place	64	Leased	No	Permanent supportive housing graduates
Tamarack Place	20	Leased	No	Affordable housing
Traugott Terrace	40	Leased	No	Permanent supportive housing
Tyree Scott Apartments	10	Leased	No	Affordable housing
Tyree Scott Apartments	6	Leased	No	Service-enriched for homeless families (with at least one minor)
Views at Madison	17	Leased	No	Affordable housing
Views at Madison	10	Leased	No	Service-enriched for homeless families (with at least one minor)
Views at Madison	7	Leased	No	Affordable housing
Villa Park	6	Leased	No	Affordable housing
Village Square II Apartments	31	Leased	No	Affordable housing
Vivian McLean Place Apartments	4	Leased	No	Affordable housing
Weller Apartments	49	Leased	No	Affordable housing
Westwood Heights East	22	Leased	No	Affordable housing
West Seattle Affordable Housing portfolio (fka Longfellow)	7	Leased	No	Affordable housing
West Seattle Affordable Housing portfolio (fka Roxhill)	6	Leased	No	Affordable housing
West Seattle Affordable Housing portfolio (fka Wisteria)	6	Leased	No	Affordable housing
Yesler Court	5	Leased	No	Affordable housing
YWCA Women's Residence	15	Leased	No	Permanent supportive housing for women
YWCA Women's Residence	38	Leased	No	Permanent supportive housing for women

Total planned existing project-based vouchers

4,984

Appendix B: Local asset management plan

I. Introduction

Since 1999, Seattle Housing Authority has utilized allowable Moving to Work flexibilities to best fulfill its mission and further the goals of the MTW program. SHA initially adopted a Local Asset Management Plan through the agency's HUD-approved 2010 MTW Plan and continues to operate under this LAMP.

SHA's MTW Agreement with HUD requires that the LAMP describes how the agency's financial management approach differs from HUD's standard asset management requirements. In addition, the agency's LAMP describes how the plan complies with 2 CFR 200 and Office of Management and Budget single fund audit requirements.

II. Framework

Consistent with requirements of 2 CFR 200, SHA's MTW agreement and the statutory objectives of the MTW program, SHA's LAMP is led by three overarching policy/cost objectives:

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

III. Local Asset Management Program Implementation

A. Project-Based Portfolio Management

SHA's local asset management approach, fundamentally, is still based on project-based portfolio management.

A fundamental principle of 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.

SHA applies 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, the agency assigns the ultimate authority for determining the scope of work to be performed to the affected property manager.

In Low-Income Public Housing properties, SHA budgets subsidy dollars with the intent that properties will break even with actual revenues and expenses. Over the course of the year, staff gauge performance at the property level in relation to that aim. When a property falls behind, the agency uses periodic portfolio reviews to discern why and agree on corrective actions and then track their effectiveness in subsequent periods. SHA reserves MTW authority to move subsidy and cash flow among LIPH properties based on considered assessment of reasons for surplus or deficit operations. SHA also uses these reviews to identify properties whose performance warrants placement on a “watch” list.

B. Key Differences

While SHA maintains a project-based asset management approach, there are key differences between SHA’s LAMP and HUD Asset Management.

- SHA utilizes an indirect service fee that is much more comprehensive than HUD’s asset management approach. HUD’s fee for service is limited to only a fee for service at the LIPH property level. SHA’s LAMP addresses the entire SHA operation including local housing and other activities not found in traditional HUD programs as allowed under our MTW agreement.
- SHA’s cost objectives are defined at a different level than HUD’s asset management program. SHA has defined three cost objectives under the umbrella of the MTW program, which are consistent with the issuance of the Catalog of Federal Domestic Assistance (CFDA) number and with the current MTW Agreement. HUD defines its cost objectives at the property level and SHA defined its cost objectives at the program level, this results in differences in the identification of direct and indirect costs.
- SHA uses its MTW authority to allocate MTW funds and project cash flow among eligible projects to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- 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 standard is to maintain all maintenance staff at the property level.
- 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 occurs only when the projects are fully complete and operational. HUD’s asset management approach records capital project work-in-progress quarterly.

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 those that can be identified specifically with a particular final cost objective. SHA's direct costs include but are not limited to costs that are allowable under the terms of the MTW Agreement and they are as follows:

- Contract costs readily identifiable with delivering housing assistance to low-income families
- Housing Assistance Payments, including utility allowances, for vouchers
- Operating costs directly attributable to operating SHA-owned properties that are Local Non-Traditional.
- Operating subsidies paid to mixed income, mixed finance communities
- Community Services and JobLink costs directly attributable to tenants' services
- Gap financing for real estate transactions that are Local Non-Traditional
- Acquisition costs for real estate transactions that are Local Non-Traditional
- Demolition, relocation, and leasing incentive fees in repositioning SHA-owned real estate that are Local Non-Traditional
- Homeownership activities for low-income families under Local Non-Traditional or other HUD approved homeownership programs
- Any other activities that can be readily identifiable with delivering housing assistance to low-income families

SHA's LAMP also includes differences in the treatment of some specific direct costs, which are listed in Appendix B - Attachment 3.

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 LAMP includes

differences in the treatment of some specific indirect costs, which are listed in Appendix B - Attachment 3 in Appendix B - Attachment 3.

SHA Indirect Service Fee – Base, Derivation and Allocation

SHA has established an Indirect Services Fee 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 vouchers** 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 a small overhead percent of the MTW 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.

Annual Review of Indirect Service Fee Charges

SHA annually reviews its indirect service fee charges in relation to actual indirect costs and incorporates 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 funding flexibility provisions.

Please consult Attachment 3 for additional detailed differences between HUD's asset management program and SHA's LAMP.

Balance Sheet Accounts

Most balance sheet accounts will be reported in compliance with HUD's asset management requirements and some will deviate from these 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 CFDA number for the MTW program.

Attachments:

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

Attachment 2: 2025 Indirect Services Fee Plan

Attachment 3: HUD vs. SHA Differences in Treatment of Specific 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	104 122 127 137 193/216 352-354 357 358 359 591 750 754	190 194 195 198 199 450 470	14 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 & Lake City	354/359	Northgate	754
Local fund	190	High Point North/South	357-358	MF developments & home ownership	700-749, 848

Appendix B - Attachment 2: 2025 Indirect Cost Allocation Plan

		Indirect services rates	
		Equal burden units	28.96
		Hard units	69.76
Department	2025 Proposed expenses	All units	Hard units only
Executive total	3,562,515	3,562,515	
Asset Management	538,019		538,019
Finance	6,490,225	6,490,225	
Housing Operations	2,374,265		2,374,265
HCV	94,132	94,132	
HR: Allocated based on staff	4,122,554	1,452,128	2,670,426
Prior year inc./exp. reconciliation – expense			
Total	\$ 17,181,710	\$ 11,598,999	\$ 6,351,413
Percentage	100%	68%	32%
Less fixed revenues	(7,143,685)		
Remaining OH* to allocate PUM	\$ 10,038,025	\$ 6,776,453	\$ 3,261,572
Units		19,501	6,662
PUM cost		\$28.76	\$40.80
PUM cost to equal burden units			\$28.96
PUM fee to hard units			\$69.76

*OH = Overhead

Indirect revenue	2025 Estimate
HUD Grant administration	4,069,348
10% of developer fee cash	461,566
LP management fees	1,654,927
Laundry fee revenue	75,605
Insurance dividend	632,239
Solid waste services	250,000
Total fixed revenues	\$ 7,143,685

Unit summary	Total
Housing units	6,662
Total vouchers	13,100
Leased vouchers at 98.00% of utilization	12,757
Total Mod Rehab	163
Divide by two for work equivalency	81.5
Total units	19,501

Appendix B - Attachment 3: HUD vs. SHA Differences in Treatment of Specific Indirect and Direct Costs

The primary differences between how SHA's LAMP treats indirect and direct costs from HUD are outlined in Section C. Cost Allocation Approach of the LAMP. In addition, the tables¹³ in this attachment identify specific differences between HUD's standard approach to indirect and direct expenses and SHA's approach under its Local Asset Management Plan.

SHA replaces "COCC" with "Indirect Services" throughout HUD's Fee/Indirect Expenses. SHA's LAMP otherwise follows HUD's approach unless listed in the table below.

Fee/indirect expense differences

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 except legal staff directly assigned to support LIPH units
	<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	--		

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
5.	Procurement	5.	Centralized Procurement staff
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.

¹³ HUD's categorizations based on Tables 7.1 and 7.2 in https://www.hud.gov/sites/documents/DOC_9191.PDF. Numbering is generally based on the order in which the item appears in those tables.

Direct expense differences

Low-Income Public Housing			
Direct expense per HUD		Direct expense per SHA LAMP	
2.	--	2.	Area management site costs allocated to AMPs within area
3.	--	3.	Direct procurement staff
11.	--	11.	Inspector costs are allocated to the projects as a direct cost.
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
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. Some executive staff costs allocated to IS.
5.	Procurement	5.	Centralized Procurement staff
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.

Appendix C: Compliance documentation

SHA Board of Commissioners resolution approving the 2025 Moving to Work Annual Plan for the Seattle Housing Authority

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

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

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

RESOLUTION NO. 5286

RESOLUTION APPROVING THE 2025 MOVING TO WORK ANNUAL PLAN FOR THE SEATTLE HOUSING AUTHORITY

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

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

WHEREAS, the MTW Annual Plan for Fiscal Year 2025 (the "Plan") must be submitted to HUD by October 17, 2024, in the format outlined in HUD Form 50900 to enable SHA to fully use its MTW flexibility;

WHEREAS, the draft Plan was made available for public comment from August 30, 2024 to September 30, 2024 on SHA's website and in hard copy form;

WHEREAS, public comment was sought through a variety of formats including a public hearing on the Plan which was held on September 16, 2024;

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

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

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

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

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

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

ADOPTED by a majority of all members of the Board of Commissioners and signed by me in open session in authentication of its passage this 14th day of October, 2024.



Chair

CERTIFIED BY:



Secretary/Treasurer

CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (01/01/2025), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

- (1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
- (5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C-1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

form HUD 50900: *Certifications of Compliance (3/2021)*

- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
- (23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Seattle Housing AuthorityWA-001**MTW PHA NAME****MTW PHA NUMBER/HA CODE**

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct.

WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Sally J. ClarkChair, Board of Commissioners**NAME OF AUTHORIZED OFFICIAL****TITLE**

10/14/2024**SIGNATURE****DATE**

*** Must be signed by either the Chair or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.**

**Certification of Consistency
with the Consolidated Plan****U.S. Department of Housing
and Urban Development**

I certify that the proposed activities/projects in the application are consistent with the jurisdiction's current, approved Consolidated Plan.
(Type or clearly print the following information:)

Applicant Name: Seattle Housing Authority

Project Name: Moving to Work Demonstration

Location of the Project: Seattle, WA

Name of the Federal
Program to which the
applicant is applying: N/A

Name of
Certifying Jurisdiction: City of Seattle

Certifying Official
of the Jurisdiction
Name: Tanya Kim

Title: Director

Signature: 

Date: 10/17/2024

Certification of Payments to Influence Federal Transactions

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

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

Applicant Name

Seattle Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Demonstration

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Sally Clark

Title

Chair, SHA Board of Commissioners

Signature



Date (mm/dd/yyyy)

10/14/2024