



Seattle Housing Authority **Moving to Work** 2021 Annual Plan



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Table of contents

(I)	Introduction	5
	Overview of short-term and long-term MTW goals and objectives	5
(II)	General operating information	7
	Housing stock information	7
	Leasing information	10
	Waiting list information	11
(III)	Proposed MTW activities	13
(IV)	Approved MTW activities	14
	Implemented activities	15
	Not yet implemented activities	46
	Activities on hold	47
	Closed out activities	48
(V)	Sources and uses of MTW funds	52
	Estimated sources and uses of MTW funds	52
	Local asset management plan	54
	Rental Assistance Demonstration participation	55
(VI)	Administrative	56
	Board resolution and certifications of compliance	56
	Documentation of public process	56
	Planned and ongoing evaluations	56
	Lobbying disclosures	56
	Appendix A: Planned existing project-based vouchers	57
	Appendix B: Local asset management plan	64

Appendix C: Compliance documentation	86
Board resolution 5195: Resolution approving the 2021 Moving to Work Annual Plan for the Seattle Housing Authority	87
Certifications of Compliance	89
Certification of Consistency with the Consolidated Plan (Form HUD-2991)	91
Certification of Payments (Form HUD-50071)	92

(I) Introduction

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

SHA provides affordable housing to more than 37,200 people¹ through a variety of opportunities including SHA owned/managed units, subsidizing collaborative units operated by non-profit partners and tenant-based vouchers that provide subsidy to participants to rent in the private market. About one-third of SHA's participants in Seattle are children and another one-third are seniors or adults with disabilities. More than 80 percent of SHA households have annual incomes below 30 percent area median income and the median household income is \$11,904 annually.

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

Funding for the agency's activities comes from multiple sources including the HUD MTW Block Grant, special purpose HUD funds, other government grants, tenant rents and revenues from other activities.

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

SHA's goals and objectives align with the three objectives of the MTW Demonstration: promoting cost-effectiveness, housing choice and self-sufficiency. Through the lens of these three goals and using the flexibility authorized under MTW, SHA continuously reviews our practices and policies to best maximize our resources and provide affordable housing to low-income people in Seattle.

Long-term goals and objectives

MTW is a critical tool in SHA's ability to advance our mission and achieve our strategic goals and objectives. Therefore, one of our long-term goals is to retain the flexibility and stability of the MTW program so we can maximize the impact of limited federal funding for people with low incomes in need of affordable housing. SHA concentrates our efforts on resources, strategies and partnerships to:

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

¹ Data was pulled on 6/30/2020.

Short-term goals and objectives

SHA's short-term MTW goals and objectives for 2021 align with the goals of the MTW Demonstration and SHA's mission, values and strategic plan building on SHA's twenty plus years of innovation under MTW. The COVID-19 pandemic, which struck our community, the nation and the world in early 2020, underscored the value of our MTW status. While the context in which we were operating changed rapidly and dramatically and will likely continue to do so for the foreseeable future, our values and strategic goals did not. Using our MTW authority, we were able to respond quickly to the impacts of COVID-19 and are using lessons learned to continue to adapt and to prepare for future states of emergency and recovery.

In 2021, SHA is not proposing any new MTW authorizations. We are updating several of our approved MTW activities as we continue to adapt to best meet the needs of the people we serve and leverage the opportunities in our community. The following is a summary of key updates (details of these updates are in Section IV: Approved MTW activities).

Inspections: SHA is updating our inspection strategies to allow for increased administrative efficiencies in our housing choice voucher program. Key updates include allowing alternative inspection approvals for new buildings and random unit sampling in large buildings with multiple voucher households.

Income and rent certification, eligibility and verification processes: SHA is always looking to streamline and improve these processes for participants and staff. Specific updates in 2021 include extending the ability for residents and applicants to provide remote authorization for documents, further streamlining certification processes for 100 percent elderly/disabled adult households, creating a local income verification hierarchy and aligning MTW strategies for certification of self-employment expenses across portfolios.

Administrative streamlining: SHA will also be using our MTW authority in 2021 to further streamline additional administrative processes in the voucher program. Specific updates include simplifying forms (e.g. the Tenancy Addendum and allowing for blanket Housing Assistance Payment contracts in large buildings with multiple voucher households), streamlining rent reasonableness determination procedures and expanding options for definitions of bedroom size.

Emergency response and recovery: SHA is continuing and building upon our emergency authorizations approved in our 2020 MTW Plan amendment to support residents and staff during the current and future states of emergency and recovery. SHA's MTW emergency response and recovery flexibilities outlined in this plan include accepting owner/property manager-certification of HCV inspections for new move-ins, deferring regularly scheduled inspections, deferring regular rent reviews, treating all sources of income verification equally and freezing the 180-day end of participation clock in HCV. SHA is also clarifying in the Plan that its short-term rental assistance strategy could be provided directly by SHA or its contracted providers and could be provided to low-income participants in any of SHA's housing units or programs.

(II) General operating information

Housing stock information

Planned new public housing units

Asset management project name and number	Bedroom size						Total units	Population type	# Uniform Federal Accessibility Standards units	
	0/1	2	3	4	5	6+			Fully accessible	Adaptable
N/A	0	0	0	0	0	0	0	N/A	N/A	N/A

0

Total public housing units to be added in 2021

If “population type” is “other” please describe:

N/A

Planned public housing units to be removed

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

The agency may seek HUD approval for demolition/disposition for the following developments, as well as those listed in prior approved plans, during 2021 for the purposes of redevelopment, mixed finance redevelopment or redevelopment using the Rental Assistance Demonstration (RAD) program:

AMP name and number	Number of units to be removed	Explanation for removal
Holly Court WA001000041	97	Disposition and/or demolition for the purposes of rehabilitation or redevelopment.
Jackson Park Village WA001000037	41	Disposition and/or demolition for the purposes of rehabilitation or redevelopment.
Jefferson Terrace WA001000009	299	Rehabilitation or redevelopment.
Scattered Sites WA001000050	57	Section 18 disposition to change as many as 57 units to Project-Based subsidy.
Scattered Sites	46	Section 18 disposition to change as many as 46 units to Project-Based subsidy.

WA001000052		
Scattered Sites WA001000054	66	Section 18 disposition to change as many as 66 units to Project-Based subsidy.
Scattered Sites WA001000056	59	Section 18 disposition to change as many as 59 units to Project-Based subsidy.

665

Total public housing units to be removed in 2021

In 2021, SHA may also:

- Apply for land disposition for sale to market-rate developers, for sale to Limited Partnerships to finance replacement housing and to the City of Seattle Parks Department. These sites may be part of previously approved HOPE VI and CNI developments.
- Consider converting selected properties to RAD, pending further analysis and discussion.
- Continue holding select Scattered Sites units offline to undergo substantial rehabilitation.
- Potentially pursue further acquisition of additional local, non-traditional housing as opportunities may arise.

Planned new project-based vouchers

Property name	Number of vouchers to be project-based	RAD?	Description of project
Multiple – Vouchers committed to City of Seattle Housing Levy award process	100	N	Housing for homeless individuals and families awarded in conjunction with City of Seattle supportive services funding through City competitive award process

100

Planned total vouchers to be newly project-based

Planned existing project-based vouchers

SHA's total **planned existing project-based vouchers for 2021 is 3,575**. The complete list includes more than 150 properties; details can be found in Appendix B.

Planned other changes to MTW housing stock anticipated in 2021

N/A

General description of all planned capital expenditures during 2021

In 2021, SHA will engage in the following capital expenditures.

Electrical: SHA will perform electrical upgrades at Westwood Heights (WA001000023), Bell

Tower (WA001000015), Longfellow Creek Apartments (WA001000096), Nelson Manor (WA001000095), Jefferson Terrace (WA001000009), Denny Terrace (WA001000017) and High Point Phase 2 (WA001000085).

Elevators: SHA is planning to perform the rehabilitation of an elevator at Tri-Court (WA001000031).

Exteriors: SHA will rehab and repair the siding at 311 Coryell Ct. E. (WA001000050), Wildwood Glen (WA001000093), 2400 E. Union St. (WA001000051), Primeau Place (WA001000094), Northgate View (WA001000055), Bell Tower (WA001000015) and 409 S. Henderson St. (WA001000056).

Flooring: SHA will be replacing flooring at Gideon-Mathews Garden (WA001000094), Carroll Terrace (WA001000094) and Pleasant Valley Plaza (WA001000094).

HVAC: SHA will be upgrading the HVAC system at Schwabacher House (WA001000092).

Interior upgrades: SHA will be upgrading the interiors of various Scattered Site units at unit turn (WA001000056, WA001000052, WA001000054, WA001000055).

Life safety: Primeau Place (WA001000094) and Olmsted Manor (WA001000095) will be part of the fire panel upgrade work that will be performed in 2021.

Painting: SHA will be painting the interior common areas of Bell Tower (WA001000015), Denny Terrace (WA001000017), Sunrise Manor (WA001000092), Island View (WA001000093), Fort Lawton Place (WA001000094), Bitter Lake Manor (WA001000095) and Tri-Court (WA001000031). We will also be doing targeted exterior painting at various Scattered Sites buildings (WA001000050, WA001000051, WA001000052, WA001000053, WA001000054, WA001000056, WA001000057).

Roofing: SHA will be replacing roofs at various Scattered Sites buildings (WA001000051, WA001000052, WA001000053, WA001000054, WA001000055, WA001000056).

Site work: This year SHA will be focusing on sidewalk and parking lot improvements at Olive Ridge (WA001000013), Jackson Park Village (WA001000037), Pinehurst Court Apartments (WA001000092), Fort Lawton Place (WA001000094) and Nelson Manor (WA001000095). There will also be sidewalk repairs, parking lot repairs and fencing repairs at various Scattered Site locations (WA001000050, WA001000051, WA001000053, WA001000054, WA001000056).

Windows and doors: SHA will be replacing windows at Bell Tower (WA001000015), Pinehurst Court Apartments (WA001000055) and various Scattered Site locations (WA001000050, WA001000051, WA001000052, WA001000053, WA001000054, WA001000056).

Leasing information

Planned number of households served

Number of households served through:	Planned number of unit months occupied/leased	Planned number of households to be served
MTW public housing units leased	66,585	5,549
MTW Housing Choice Vouchers utilized	117,168	9,764
Local, non-traditional: Tenant-based	N/A	N/A
Local, non-traditional: property-based	15,288	1,274
Local, non-traditional: Homeownership	N/A	N/A

Planned total households served

199,041	16,587
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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	N/A	N/A	N/A
Property-based	MTW Activity #8: Special purpose housing ²	1,270	106
Property-based	MTW Activity #20: Local, non-traditional affordable housing strategies	14,018	1,168
Homeownership	N/A	N/A	N/A

Discussion of any anticipated issues/solutions related to leasing

Housing program	Description of actual leasing issues and solutions
MTW public housing	Leasing has been postponed for much of 2020 due to COVID-19 and continuation of COVID-19 into 2021 is the biggest risk to leasing success. Even without the pandemic, some units and portfolios are more difficult to lease than others, such as Scattered Site units (including single family homes) in Seattle's northern neighborhoods and studio units (in lieu of one-bedroom units). Despite these

² SHA has previously reported on some property-based LNT unit occupancy rates (such as those in our agency units and respite units) in the MTW Report under the metrics for Activity 8, but did not explicitly list them under their own activity in the LNT activity table. This oversight is corrected beginning in this MTW Plan and moving forward.

	challenges, we anticipate that our high occupancy levels will continue.
MTW Housing Choice Voucher	Continuation of COVID-19 state of emergency into 2021 is the biggest risk to leasing success. Specifically, unit availability (lower unit vacancy rates) is expected to be a significant issue. Availability could be impacted in several ways including increased competition for more affordable units if the economy slows, reluctance on the part of landlords to rent units for fear of spreading disease, reluctance to allow unit inspections, etc. SHA's plans to mitigate these issues include continuing to provide housing search assistance for shoppers, using inspection flexibility wherever practical, providing safety equipment to staff and participants and building on community partnerships with landlords.
Local, non-traditional	As social distancing and other pandemic-related measures ease, we expect leasing rates for local non-traditional units to be strong in 2021.

Waiting list information

Waiting list information anticipated

Waiting list name	Description	Number of households on waiting list	Waiting list open, partially open or closed	Plans to open the waiting list during 2021
MTW public housing	Site-based	6,039	Partially open	No
MTW Housing Choice Voucher (Tenant-Based)	Community-wide	1,225	Closed	No
MTW Housing Choice Voucher (Project-Based)	Site-based	1,600 ³	Partially open	No
Local, non-traditional	Site-based	0	Closed ⁴	No

Please describe any duplication of applicants across waiting lists

There is duplication across waiting lists as households are permitted to be and often are on waiting lists for many housing programs (e.g. public housing and tenant-based vouchers) at the same time. For project-based units, many partners fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system which maintains a central waitlist for permanent supportive housing units. Some partners may maintain their own waiting lists

³ Many PBV units are managed by partners, who fill their vacancies through the King County-wide Coordinated Entry for All (CEA) system, which maintains a central waitlist for permanent supportive housing units. Because of this, the number of households on the waitlist for these units is an estimate based on previous years' totals.

⁴ SHA combined the project-based and public housing waitlists in 2019 using our MTW authority in Activity 15: Combined program management.

instead of or in conjunction with the CEA system, and applicants may be duplicated because of this as well.

Planned changes to waiting list in 2021

Waiting list name	Description of planned changes to waiting list
MTW public housing	No changes are planned.
MTW Housing Choice Voucher (Tenant-Based)	No changes are planned.
MTW Housing Choice Voucher (Project-Based)	No changes are planned.
Local, non-traditional	No changes are planned.

(III) Proposed MTW activities

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

SHA is not proposing any new activities in 2021.

(IV) Approved MTW activities

Introduction

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

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

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

1. Development simplification
2. Family Self-Sufficiency program
3. Inspection protocol
4. Investment policies
5. Local leases
6. MTW Block Grant and fungibility (*no longer reported as an MTW activity*)
7. Procurement (*no longer reported as an MTW activity*)
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
14. Related nonprofits (*closed out as an MTW activity*)
15. Combined program management
16. Local asset management program (*no longer reported as an MTW activity*)
17. Performance standards (*no longer reported as an MTW activity*)
18. Short-term assistance
19. Mobility and portability
20. Use of funds for local non-traditional affordable housing
21. Self-sufficiency assessment and planning
22. Housing assistance for school stability

In the following pages, we provide a description of these MTW activities that have been previously approved and describe anticipated updates for 2021.

In accordance with the required HUD format, activities are organized in separate sections based on whether they are active, not yet implemented, on hold or closed out.

Within each approved activity, SHA structures the section with the required HUD data as well as a table of strategies. For convenience, SHA uses a numbering system to categorize strategies as agency-wide (noted with an “A” in the number), voucher-specific (noted with an “H”) and public housing-specific strategies (noted with a “P”). These categorizations are neither official nor limiting in the application of the strategies.

Emergency response and recovery

In continued response to the COVID-19 pandemic and drawing upon lessons learned and best practices in emergency preparedness, SHA is establishing provisions within several MTW activities for both adapting to the current and planning for potential future states of emergency and recovery. Each of those activities specifies the applicable MTW flexibilities and refers to this section for the following description of states of emergency and recovery: In the event that a government body with authority over our jurisdiction (e.g. City of Seattle, King County, State of Washington, the federal government), SHA's Board of Commissioners and/or SHA's Executive Director (as authorized by the Board of Commissioners) declares a state of emergency, SHA may utilize state of emergency and recovery flexibilities outlined in its MTW plan during the state of emergency and subsequent recovery. The state of emergency declaration may last until the emergency has been deemed to end by the declaring body or the declaration expires. The recovery period may last up to 18 months following the state of emergency, unless an extension is necessary due to conditions that preclude staff and residents from undertaking regular operations.

Details about specific modifications are included in the following sections: Activity 2: Family Self-Sufficiency program, Activity 3: Inspection protocol, Activity 5: Local leases, Activity 9: Project-based program, Activity 10: Local rent policy, Activity 12: Waiting lists, preferences and admissions and Activity 13: Homeownership and graduation from subsidy.

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.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
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	Has not been implemented	Inactive
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	2004	Active
1.P.03	Total Development Cost limits: Replace HUD's Total Development Cost limits with reasonable limits that reflect the local market place for quality construction.	1999 MTW Plan	Has not been implemented	Under development
1.P.04	Streamlined mixed-finance closings: Utilize a streamlined process for mixed-finance closings	2000 MTW Plan	2005	Inactive
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	2004	Inactive
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	Has not been implemented	Under development

Planned non-significant changes

None.

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 age 18 and older and helps residents build job preparation and interview skills, teaches financial planning and literacy skills, supports residents to start a small business, connects residents with resources in the community such as childcare and transportation and helps residents sign up for college or vocational training, apply for jobs or explore buying a home.

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

Approved strategies in this activity are as below.

2021 Updates

In 2021, SHA has updates to the implementation of the following strategies under Activity 2:

Strategy 2.A.03: FSS escrow accounts; Strategy 2.A.04: FSS participation contract; Strategy 2.A.06: FSS program incentives

Remote authorizations: As first approved in SHA's 2020 MTW Plan amendment in response to the COVID-19 pandemic, in 2021 and going forward, SHA may allow participants to provide approvals and certifications over the phone, by email or other means in lieu of a signature during states of emergency and recovery (as described in the Introduction to Section IV). In addition, SHA may use this authority in select situations outside of states of emergencies to better assist participants who may have various challenges with providing a written signature including those with mobility issues, lack of internet access, health conditions and other approved circumstances. Policies around remote authorizations and approval processes will be outlined as appropriate in SHA's Admissions and Continued Occupancy Plan (ACOP), HCV Administrative Plan ("Admin Plan") and related procedure manuals.

Strategy	Description	First identified	First implemented	Current status
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	Has not been implemented	Inactive

2.A.02	SJI preference + time limits: Preference for Seattle Jobs Initiative participants coupled with time limits.	1999 MTW Plan	Has not been implemented	Inactive
2.A.03	FSS escrow accounts: Use local policies for determining escrow calculation, deposits, and withdrawals.	2007 MTW Plan	2018	Active
2.A.04	FSS participation contract: Locally designed contract terms including length, extensions, interim goals, and graduation requirements.	2007 MTW Plan	2018	Active
2.A.05	FSS Program Coordinating Committee: Restructure Program Coordinating Committee (PCC) to better align with program goals and local resources.	2007 MTW Plan	Has not been implemented	MTW authority not needed
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	2018	Active
2.A.07	FSS selection preferences: Up to 100 percent of FSS enrollments may be selected by local preferences.	2007 MTW Plan	2018	Active

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.

2021 Updates

In 2021, SHA has a number of updates to the implementation of existing strategies under Activity 3.

Strategy 3.A.01: Private sector cost benefit and risk management approaches to inspections

States of emergency: SHA's amended 2020 MTW Plan activated and updated 3.A.01, allowing that the implementation of this strategy may also include accepting owner or property manager self-certification in place of new lease inspections while using risk management criteria for new move-ins to facilitate housing access. In 2021 and moving forward, SHA may use these flexibilities during states of emergency and recovery (described in the Introduction to Section IV) and is further clarifying that implementation of this strategy may include foregoing quality control inspections during the state of emergency and recovery period.

Certificates of Occupancy: Using our approved MTW authority under Strategy 3.A.01, SHA's Housing Choice Voucher program may allow buildings with new Temporary Certificates of Occupancy or Certificates of Occupancy from the City of Seattle to self-certify for HQS (or HUD-approved alternative) in place of physical initial inspections for new move-ins. In piloting this authorization, SHA plans to conduct an inspection of a representative sample of units in the building, including common areas. When doing so, the representative sample may be waived if the building has been inspected using HUD-approved alternatives to HQS for HOME or LIHTC or has had an inspection conducted by HUD. Ongoing implementation of sampling inspections will be determined based on pilot results.

Strategy 3.A.03: Reduced frequency of inspections

States of emergency: SHA's amended 2020 MTW Plan noted that the implementation of Strategy 3.A.03 may include deferring inspections until the agency has recovered from the COVID-19 crisis or the next regular inspection is due. In 2021 and moving forward, SHA may use these flexibilities during states of emergency and recovery (as described in the Introduction to Section IV).

Risk management approach in large buildings: Since 2003, SHA has reduced the frequency of inspections while using risk management as an underpinning. SHA may expand biennial and triennial inspections in the voucher program based on building inspection performance. Beginning in 2021, SHA may also implement representative sampling in properties with multiple vouchers (tenant and/or project-based).

In addition, SHA is clarifying that all agency-wide and voucher strategies under Activity 3: Inspections may also apply to project-based voucher units.

Strategy	Description	First identified	First implemented	Current status
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	2020	Active
3.A.03 (formerly 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.	1999 MTW Plan	2003	Active
Voucher strategies				
3.H.01	Inspect SHA-owned properties: Allows SHA staff, rather than a third party entity, to complete inspections of SHA owned properties.	2000 MTW Plan	2001	Active
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	Has not been implemented	Inactive
3.H.04	Self-certification for minor fails: Self-certification by landlords of correction of minor failed inspection items.	2010 MTW Plan	2010	MTW authority no longer required

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.

Approved strategies in this activity are as below.

2021 Updates

In 2021, SHA has a number of updates to the implementation of existing strategies under Activity 5.

Remote authorizations: As first approved in SHA's 2020 MTW Plan amendment in response to the COVID-19 pandemic, in 2021 and going forward, SHA may allow participants to provide approvals and certifications over the phone, by email or other means in lieu of a signature during states of emergency and recovery (as described in the Introduction to Section IV). In addition, SHA may use this authority in select situations outside of states of emergencies to better assist participants who may have various challenges with providing a written signature including those with mobility issues, lack of internet access, health conditions and other approved circumstances. Policies around remote authorizations and approval processes will be outlined as appropriate in SHA's ACOP, Admin Plan and related procedure manuals.

Strategy 5.H.01: HAP contracts (formerly Strategy 9.H.06)

Tenancy Addendum: SHA is clarifying that the Tenancy Addendum is a part of the Housing Assistance Payment contract. SHA is also updating that implementation of this activity may include an alternative Tenancy Addendum. SHA will continue to collect and document the required information and will continue to provide all relevant provisions to the tenant and property manager/owner.

Community-based contracts (CBC): Beginning in 2021, SHA may use community-based Housing Assistance Payment (HAP) contracts for individual buildings or multi-building communities where the agency has previously entered into multiple tenant-based HAP contracts. CBCs will serve as an umbrella HAP contract for many or, likely, all tenant-based vouchers in use in the respective building/community. Necessary unit- and household-specific information will be updated through addenda to the CBC or similar.

Strategy	Description	First identified	First implemented	Current status
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	1999	Active
Voucher strategies				
5.H.01 (recategorized from 9.H.06 in 2020)	HAP contracts: SHA may modify the HAP contract and Tenancy Addendum	2000 MTW Plan	2000	Active

Public housing strategies				
5.P.01	Local lease: SHA may implement its own lease, incorporating industry best practices.	2001 MTW Plan	2011	Inactive
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	Has not been implemented	Inactive
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	2009	Inactive
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	2011	Active
5.P.05	Leasing incentives: SHA may offer lease incentives to promote the leasing of a public housing unit	2017 MTW Plan	2018	Active

Planned non-significant changes

None.

Planned changes to metrics/data collection

In previous Annual Reports, averages for self-sufficiency metrics included values of zero where they had previously been excluded. In the 2019 Report (submitted in April 2020) and going forward, we will include values of zero in calculations.

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.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
8.A.01	Conditional housing: Housing program for those who do not currently quite meet SHA's minimum qualifications	2000 MTW Plan	Has not been implemented	Inactive
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	Prior to MTW participation	Active
8.A.03	Service-enriched housing: With the help of key partners, SHA may develop supportive housing communities.	2001 MTW Plan	Has not been implemented	Inactive
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	Prior to MTW participation	Active
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	Prior to MTW participation	Active
8.P.03	Designate LIPH units for specific purposes/ populations: SHA may designate properties/units for specific purposes such as elderly.	2000 MTW Plan	2011	Inactive (2020)
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	Has not been implemented	Inactive
8.P.05	Pet-free environments: Establish pet-free environments in connection with selected service enriched housing.	2009 MTW Plan	Has not been implemented	Inactive

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #9: Project-based program

Status

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

Description

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

Approved strategies in this activity are as below.

2021 Updates

In 2021, SHA has a number of updates to the implementation of existing strategies under Activity 9.

Remote authorizations: As first approved in SHA's 2020 MTW Plan amendment in response to the COVID-19 pandemic, in 2021 and going forward, SHA may allow participants to provide approvals and certifications over the phone, by email or other means in lieu of a signature during states of emergency and recovery (as described in the Introduction to Section IV). In addition, SHA may use this authority in select situations outside of states of emergencies to better assist participants who may have various challenges with providing a written signature including those with mobility issues, lack of internet access, health conditions and other

approved circumstances. Policies around remote authorizations and approval processes will be outlined as appropriate in SHA's ACOP, Admin Plan and related procedure manuals.

Strategy 9.H.01: Cost-benefit inspection approach

SHA will be inactivating Strategy 9.H.01, as this authority is covered in agency-wide inspections Strategies 3.A.01 and 3.A.03.

Strategy 9.H.06: HAP contracts

SHA will be recategorizing Strategy 9.H.06 to Strategy 5.H.01 to clarify that the strategy applies to all voucher units, not just project-based units.

Strategy	Description	First identified	First implemented	Current status
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	2004	Inactive (superseded by Strategies 3.A.01 and 3.A.03)
9.H.02	Assets in rent calculation: Only calculate income on assets declared as valuing \$5,000 or more.	2000 MTW Plan	2005	Inactive (superseded by \$50,000 under 10.H.12)
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	2000	Active
9.H.04	Contract term: Project-based commitments renewable up to 40 years.	2000 MTW Plan	2000	Active
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	2002	Active
9.H.06	Recategorized as 5.H.01 (2020). See Activity 5.			
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	2000	Active
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	2005	Active

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	2000	Active
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	2008	Active
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	2000	Inactive
9.H.12	Streamlined admissions: SHA may streamline and centralize applications and waiting list processes for project-based HCV units.	2000 MTW Plan	2000	Active
9.H.13	Competitive allocation process: Commit vouchers to the City's competitive process for housing funding.	2004 MTW Plan	2005	Active
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	2004	Active
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	2004	Active
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	2005	Active
9.H.17	Program-based vouchers: Allocate floating voucher subsidy to a defined group of units or properties.	2003 MTW Plan	2004	Active
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	2007	Active

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	Inactive
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	2000	Active
9.H.21 (formerly 9.H.20)	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	Prior to MTW participation	Active

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #10: Local rent policy

Status

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

Description

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

Approved strategies in this activity are as below.

Updates

In 2021, SHA has a number of updates to the implementation of existing strategies under Activity 10.

Remote authorizations: As first approved in SHA's 2020 MTW Plan amendment in response to the COVID-19 pandemic, in 2021 and going forward, SHA may allow participants to provide approvals and certifications over the phone, by email or other means in lieu of a signature during states of emergency and recovery (as described in the Introduction to Section IV). In addition, SHA may use this authority in select situations outside of states of emergencies to better assist participants who may have various challenges with providing a written signature including those with mobility issues, lack of internet access, health conditions and other approved circumstances. Policies around remote authorizations and approval processes will be outlined as appropriate in SHA's ACOP, Admin Plan and related procedure manuals.

States of emergency - certification deferrals: In response to the COVID-19 crisis, SHA's 2020 amended MTW Plan updated 10.H.10 and 10.P.03 to allow SHA to defer regular rent reviews for all household types until the agency has recovered from the crisis or the next regular rent review is due. Residents retain applicable opportunities to have an interim review. In 2021 and moving forward, SHA may use these flexibilities during states of emergency and recovery (described in the Introduction to Section IV). Given that this emergency provision applies to all household types, but the remaining aspects of these strategies apply to a subset of household types, for clarity SHA is listing this as a distinct "emergency" strategy (**10.EM.1**) in the table below.

Strategy 10.A.01: Streamlined income verification

States of emergency: SHA's amended 2020 MTW Plan updated 10.A.01 to allow SHA to treat all sources of income verification equally. In 2021 and moving forward, SHA may use these flexibilities during states of emergency and recovery (described in the Introduction to Section IV).

Further streamlining of income verification: Strategy 10.A.01 is intended to streamline the income verification process and improve administrative efficiency. Using lessons learned from the response to COVID-19 and adapting to current circumstances, SHA is updating this strategy to allow for the adoption of a local income verification hierarchy. SHA may also expand the circumstances for extending the timeframe income documentation and determination remain valid, including during voucher shopping. The description in the table below is updated accordingly.

Strategy 10.A.02: Self-employment expenses (formerly Strategy 10.P.23)

In 2015, Strategy 10.P.02 was approved to allow public housing households to declare self-employment expenses up to a set threshold of income without further validation. In 2021 and going forward, SHA may apply this authority to all MTW housing types. To reflect this agency-wide application, Strategy 10.P.23 is recategorized to Strategy 10.A.02.

Strategy 10.H.04: Payment standard

Since 2003, SHA has had the authority to adopt local payment standards. In SHA's approved 2019 MTW Plan it was confirmed that this includes the ability to use local and state agency definitions of bedroom size (such as from the Seattle Department of Construction and Inspections) for determining the voucher payment standard for open one-bedrooms (classifying them as one-bedroom rather than studio units). We are clarifying this may apply to units of all

bedroom sizes.

Strategy 10.H.09: Rent reasonableness streamlining

Many of SHA's vouchers are utilized in units where rent that has previously been determined to be rent reasonable via other MTW activities (e.g. local VPS), administrative policies (e.g. OCAF adjusted rent increases for project-based units) or other policies (e.g. tax credit limits). In these cases, the rent reasonable determination process is unnecessary and adds inefficiencies.

In 2006, SHA established authority to increase the efficiency of the rent reasonable determination processes when processing rent increase requests and subsequently clarified that implementation of this strategy applies to new move ins and annual reviews. SHA is updating that implementation of our rent reasonableness strategy as follows:

- SHA may eliminate the process for determining rent reasonableness (including initial rent determinations, rent increase requests, change in utility responsibilities and/or unit swaps) for units that are rent-restricted or limited through affordability agreements or similar arrangements.
- SHA may streamline rent reasonable determinations for units that are not subject to affordability agreements or similar arrangements based on locally determined criteria. Examples of criteria for streamlined rent reasonableness determination may include rent increases that are less than local average increases and initial or increased rents that are below affordable rent limits.

Strategies 10.H.10 and 10.P.03: Rent reviews for entirely elderly/disabled adult households every three years

SHA first began implementing reduced frequency of recertifications for elderly and/or disabled households more than 15 years ago. During that time, SHA has learned that income for elderly/disabled households without wages tends to remain steady over the years. Therefore, in lieu of traditional three-year full certifications SHA may use a streamlined certification process for qualifying households in which SHA would rely primarily on HUD's Enterprise Income Verification (EIV) system and other upfront income verification systems to monitor household incomes. Unless a discrepancy is identified that exceeds the interim threshold, rent may continue to be calculated in the same manner as an "off year." Households will retain the opportunity and obligation to report household changes and income changes that exceed the agency's interim thresholds. SHA may also continue implementation of our current approach to elderly/disabled adult household certifications for some portfolios or subgroups, and may conduct other income certifications required of funding partners.

Strategy 10.P.17: SSHP rent policy

SHA's Seattle Senior Housing Program (SSHP) portfolio serves low-income seniors and adults with disabilities. It utilizes a tiered rent structure and tenants generally remain on the rent tier they qualified for at move in unless they have a permanent change in income. Since SSHP units came under public housing in 2011, SHA has implemented a three-year review cycle to meet HUD requirements. Prior to that time, SSHP was unsubsidized and residents did not complete income reviews after moving in unless they had a permanent change in income. When doing income reviews to prepare for public housing in 2011, SHA found very few SSHP residents had experienced significant income changes. Building on these lessons and those outlined in the

updates to 10.P.03 and 10.H.10, SHA may also use a streamlined certification process for all qualifying households in the SSHP portfolio. SHA would rely primarily on HUD's Enterprise Income Verification (EIV) system and other upfront income verification systems to monitor household incomes. Unless a substantial discrepancy is identified, rent may continue to be calculated in the same manner as an "off year." Households will retain applicable opportunities and obligations to report household and income changes. SHA may also conduct other income certifications required of funding partners.

Strategy	Description	First identified	First implemented	Current status
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	2014	Active
10.A.02 (recategorized from 10.P.23 in 2020)	Self-employment expenses: Households may declare employment expenses up to a set threshold of gross income without further validation of deductions.	2014 MTW Plan	2015	Active
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	2005	Active
10.H.02	Rent cap-use gross income: Rent burden calculated on 40% of Gross Income, up from HUD's standard 30% of Adjusted Income.	2000 MTW Plan	2005	Active
10.H.03	Rent reasonableness at SHA-owned units: Allows SHA staff to perform rent reasonable determination for SHA-owned units.	2000 MTW Plan	2000	Active
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	2002	Active
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	Has not been implemented	Inactive
10.H.06	Payment standard-SROs: SHA may use the studio payment standard for SRO units.	2003 MTW Plan	2003	Active
10.H.07	Tenant-based self-sufficiency incentives: Rent policies to foster self-sufficiency among employable households, including income disregards proportional to payroll tax;	2005 MTW Plan	Has not been implemented	Inactive

	allowances for employment-related expenses; intensive employment services coupled with time limits; locally-defined hardship waivers.			
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	Has not been implemented	Inactive
10.H.09	Rent reasonableness streamlining: Allows SHA to streamline rent reasonable determinations, including automatic annual updates and shared housing.	2006 MTW Plan	2017	Active
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	2010	Active
10.H.11	Recategorized as 13.H.02. See Activity #13.			
10.H.12	Asset income threshold: SHA will establish a threshold for calculating asset income to an amount up to \$50,000 and may allow self-certification of assets below the threshold.	2010 MTW Plan	2010	Active
10.H.13	Streamlined medical deduction: SHA will allow self-certification of medical expenses.	2010 MTW Plan	2011	Active
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	2011	Active
10.H.15	Disregard of student financial aid as income: SHA may disregard student financial aid as income.	2019 MTW Plan	2019	Active
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	2001	Active
10.P.02	Earned Income Disregard: HUD's Earned Income Disregard is not offered to public housing residents.	2000 MTW Plan	2001	Active
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	2004	Active
10.P.04	Rent freezes: Voluntary rent policy freezes rent in two year intervals.	2000 MTW Plan	2000	Inactive

10.P.05	TANF rent calculation: Calculate TANF participant rent on 25% of gross income.	2000 MTW Plan	2000	Inactive
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	2001	Inactive
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	2001	Inactive
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	2001	Active
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	Has not been implemented	Inactive
10.P.10	Studio vs. one-bedroom: Differentiate rents for studios vs. one-bedroom units.	2005 MTW Plan	Has not been implemented	Inactive
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	Has not been implemented	Inactive
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	2008	Active
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	2014	Active
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	Has not been implemented	Inactive
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	2010	Active
10.P.16	Utility allowance: local benchmark: SHA may develop new benchmarks for "a reasonable use of utilities by an energy conservative household" - the	2009 MTW Plan	Has not been implemented	Inactive

	standard by which utility allowance are calculated.			
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	2011	Active
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	2001	Active
10.P.19 (recategorized from 10.P.17 in 2013)	Asset income threshold: SHA will increase the threshold for including asset income in rent contribution calculations to an amount up to \$50,000 and may allow self-certification of assets below the threshold.	2012 MTW Plan	2012	Active
10.P.20	Simplified Utility Assistance Payment for HOPE VI communities: HOPE VI participants receive a maximum level of consumption rather than reduction, and incentive for conservation. Annual adjustments are made at the next regularly scheduled annual review or update.	2013 MTW Plan	2013	Active
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	2005	Active
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	2005	Active
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	2015	Active
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	2020 MTW Plan	2020	Active

	retain applicable opportunities to have an interim review.			
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Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

MTW Activity #11: Resource conservation

Status

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

Description

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

Approved strategies in this activity are as below.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
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	2000	Active

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.

Approved strategies in this activity are as below.

2021 Updates

In 2021, SHA has a number of updates to the implementation of existing strategies under Activity 12.

Remote authorizations: As first approved in SHA's 2020 MTW Plan amendment in response to the COVID-19 pandemic, in 2021 and going forward, SHA may allow participants to provide approvals and certifications over the phone, by email or other means in lieu of a signature during states of emergency and recovery (as described in the Introduction to Section IV). In addition, SHA may use this authority in select situations outside of states of emergencies to better assist participants who may have various challenges with providing a written signature including those with mobility issues, lack of internet access, health conditions and other approved circumstances. Policies around remote authorizations and approval processes will be outlined as appropriate in SHA's ACOP, Admin Plan and related procedure manuals.

Strategy 12.A.02: Streamlined eligibility verification (formerly Strategy 12.H.06)

States of emergency: SHA's 2020 MTW Plan amendment updated 12.H.06 to apply to all MTW-funded housing and allow for further streamlining, such as treating all sources of income verification equally. In 2021 and moving forward, SHA may utilize these flexibilities during states of emergency and recovery (described in the Introduction to Section IV).

Recategorization: SHA's approved 2020 MTW Plan amendment also broadened the applicability of Strategy 12.H.06 to all household types. To reflect this change, SHA will recategorize this Strategy as 12.A.02.

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
12.A.01	Local preferences: SHA may establish local preferences for federal housing programs.	2002 MTW Plan	2002	MTW authority not currently needed
12.A.02 (Recategorized from 12.H.06 in 2020)	Streamlined eligibility verification: Streamline eligibility verification standards and processes, including allowing income verifications to be valid for up to 180 days.	2009 MTW Plan	2013	Active
Voucher strategies				
12.H.01	Recategorized as 9.H.20. See Activity #9.			
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	2002	Active
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	2003	Active
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	2008	MTW authority no longer required
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	2011	Active
12.H.06	Recategorized as 12.A.02 (2020).			
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	1999	MTW authority not currently needed

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	2000	Active
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	2004	MTW no longer required
12.P.04	No waiting list: Allows for filling units without a waiting list.	2008 MTW Plan	Has not been implemented	Inactive
12.P.05	Eligibility criteria: Unique eligibility criteria for specific units or properties, such as service enriched units.	2008 MTW Plan	Has not been implemented (except for the agency units governed by 8.P.01)	Inactive
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	2013	Active

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

Approved strategies in this activity are as below.

2021 Updates

In 2021, SHA has one update to the implementation of existing strategies under Activity 13.

Strategy 13.H.02: 180-day EOP clock

States of Emergency: SHA may freeze the 180-day end of participation clock for households during states of emergency and recovery (described in the Introduction to Section IV).

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
13.A.01	Down payment assistance: Allocate MTW Block Grant funds to offer a local down payment assistance program.	2004 MTW Plan	2004	Inactive
13.A.02	Savings match incentive: Program that matches savings and provides financial information for participating public housing and HCV households leaving subsidized housing for homeownership or unsubsidized rental units.	2012 MTW Plan	2013	Inactive
Voucher strategies				
13.H.01	Monthly mortgage assistance: SHA may develop a homeownership program that includes a monthly mortgage subsidy.	2008 MTW Plan	Has not been implemented	Inactive
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	2010	Active
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	2016	Active
13.P.02	Incentives for positive tenant departures and housing stability: SHA	2019 MTW Plan	2019	Active

	may provide a financial incentive to public housing households who vacate their unit in a manner consistent with SHA unit guidelines.			
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Planned non-significant changes

None.

Planned changes to metrics/data collection

The metrics proposed and approved for CE #1 and CE #2 in 2019 were total remediation costs and total vacancy time in the four buildings identified for the pilot in Strategy 13.P.02. However, the baseline and benchmark included for CE #2 actually reflected the average vacancy days per unit in each of the four buildings. These metrics also do not reflect staff time savings, per the definition of the metric in the HUD Form 50900. The baseline and benchmark for CE #2 were recalculated based on 2017 numbers to reflect the 2017 total vacancy days in the identified buildings (baseline) and 10% reduction from the baseline (benchmark). This metric was recategorized as an agency metric. The average vacancy days per unit measure was removed as a stand-alone metric and folded into the agency metric.

Planned significant changes

None.

MTW Activity #15: Combined program management

Status

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

Description

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

Approved strategies in this activity are as below.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
15.A.01	Combined program management: Combined program management for project-based vouchers co-located with public housing or other units in communities operating both subsidy types.	2008 MTW Plan	2008	Active

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.

2021 Updates

Strategy 18.A.03: Short-term rental assistance (formerly Strategy 18.H.01)

In 2013, HUD authorized SHA's short-term rental assistance MTW activity. Strategy 18.H.01 was established to provide funding for short-term shallow rental assistance through a cooperative initiative to prevent homelessness through targeted housing assistance and services. The 2014 update to this strategy included a broader range of eligible services, such as short-term assistance with rents, deposits, arrears and/or utilities as needed for targeted households. In 2018, this strategy was categorized as inactive as the prioritized needs were being met by other systems. However, due to the immense impacts of COVID-19 on our community and the people we serve, SHA is reactivating this strategy and providing two updates/clarifications. Assistance may also be provided by SHA or contracted providers. Assistance may be provided for low-income residents and participants in any of SHA's housing units or programs. Accordingly, we have also updated the description. We have also corrected the categorization of the strategy from 18.H.01 to 18.A.03.

Strategy	Description	First identified	First implemented	Current status
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	Has not been implemented	Inactive
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	2014	Active
18.A.03 (recategorized from 18.H.01 in 2021)	Short-term rental assistance: SHA may provide short-term rental and related assistance to help families, students, adults and youth obtain and retain housing.	2013 MTW Plan	2013	Active
Voucher strategies				
18.H.01	Recategorized as 18.A.03 (2021).			

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.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
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	Has not been implemented	Inactive
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	2015	Active
19.H.03	One year residency requirement before port out: SHA may require that Housing Choice Voucher households live in Seattle for one year before moving with their voucher to a different community.	2015 MTW Plan	2015	Active
19.H.04	Streamlined local timelines and processes for improved leasing	2019 MTW Plan	2019	Active

	success: SHA may modify leasing timelines and processes to support leasing success and improve efficiency			
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Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

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

Status

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

Description

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

Approved strategies in this activity are as below.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
Agency-wide strategies				
20.A.01	Use of funds for local non-traditional affordable housing: SHA may use Block Grant funds to develop, capitally improve, maintain and operate affordable housing outside of	2013 MTW Plan	2011	Active

	the traditional public housing and voucher programs.			
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Actual non-significant changes

None.

Actual changes to metrics/data collection

None.

Actual significant changes

None.

MTW Activity #22: Housing assistance for school stability

Status

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

Description

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

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

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

Approved strategies in this activity are as below.

2021 Updates

None.

Strategy	Description	First identified	First implemented	Current status
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	2016	Active

Planned non-significant changes

None.

Planned changes to metrics/data collection

None.

Planned significant changes

None.

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	First implemented	Current status
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	Has not been implemented	Not yet implemented

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.

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	First implemented	Current status
Agency-wide strategies				
4.A.01	Investment policies: SHA may replace HUD investment policies with Washington State investment policies.	1999 MTW Plan	1999	On Hold

Reactivation

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

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	First implemented	Current status
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	1999	Closed
6.A.03	Operating reserve: Maintain an operating reserve consistent with sound management practices	1999 MTW Agreement	1999	Closed
86 (Archival numbering system)	Obligation and expenditure timelines: SHA may establish timelines for the obligation and expenditure of MTW funds	1999 MTW Agreement	1999	Closed
Voucher strategies				
6.H.01	Utilization goals: Utilization defined by use of budget authority	2003 MTW Plan	2003	Closed

Reason for closing

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

MTW Activity #7: Procurement

Status

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

Description

Approved strategies in this activity are as below.

Strategy	Description	First identified	First implemented	Current status
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	1999	Closed
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	1999	Closed
7.A.03	Wage rate monitoring: Simplified process for monitoring the payment of prevailing wages by contractors	1999 MTW Plan	1999	Closed

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	First implemented	Current status
Agency-wide strategies				
14.A.01	Related non-profit contracts: SHA may enter into contracts with any related nonprofit.	2004 MTW Plan	Never implemented	Closed

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	First implemented	Current status
Agency-wide strategies				
29 (Archival numbering system)	Local asset management program: Use asset management principles to optimize housing and services	2000 MTW Plan	2000	Closed

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	First implemented	Current status
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	1999	Closed

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) Sources and uses of funding: 2021 carry-on budget

Estimated sources and uses of MTW funds

Estimated sources of MTW funds

FDS line item number	FDS line item name	Dollar amount
70500 (70300+70400)	Total Tenant Revenue	\$16,459,000
70600	HUD PHA Operating Grants	\$ 193,719,000
70610	Capital Grants	\$14,634,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$0
71100+72000	Interest Income	\$172,000
71600	Gain or Loss on Sale of Capital Assets	N/A
71200+71300+71310+71400+71500	Other Income	\$1,758,000
70000	Total Revenue	\$226,742,000

Estimated uses of MTW funds

FDS line item number	FDS line item name	Dollar amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating – Program and Administrative	\$23,521,000
91300+91310+92000	Management Fee Expense	\$7,925,000
91810	Allocated Overhead	N/A
92500 (92100+92200+92300+92400)	Total Tenant Services	\$154,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$6,738,000
93500+93700	Labor (Included in Line 94000)	N/A
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$15,268,000
95000 (95100+95200+95300+95500)	Total Protective Services	\$601,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	\$1,898,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$1,474,000
96700 (96710+96720+96730)	Total Interest Expense & Amortization Cost	N/A
97100+97200	Total Extraordinary Maintenance	\$0
97300+97350	HAP + HAP Portability-In	\$119,537,000
97400	Depreciation Expense	N/A
97500+97600+97700+97800	All Other Expense (maximum)	\$15,100,000
90000	Total Expenses	\$192,216,000

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

The 2021 budget presented in the fall of 2020 is a carry-on budget. This 2021 carry-on budget consists of modest operating expense changes made to the 2020 budget but with more significant adjustments to revenue and Housing Assistance Payments projections that take into consideration the impact of COVID-19. The carry-on budget approach is necessary due to the work environment caused by provisions and regulations put in place to slow the spread of COVID-19. This is our best effort at this time, but we plan to review and incorporate additional budget adjustments later in 2020 and early 2021 when departments evaluate and present their 2021 work plans to address the impact of COVID-19 and achieve strategic objectives

Estimated MTW sources exceed estimated MTW uses for several reasons. The summary of expenditures table does not include capital expense, which account for approximately \$14.5 million. Seattle Housing Authority's planned capital expense budget is not part of the uses table but capital sources are included on the sources table. In addition, the uses table does not include \$19.0 million that Seattle Housing Authority plans to spend on local housing, programs and services for voucher and public housing participants, such as career coaching, youth engagement and education, parks operations in low-income communities and planning for and redevelopment of low-income housing. See the description of single fund flexibility that follows in this section for a discussion of expenses not included within the uses table. The uses table also does not capture over \$1.0 million for required replacement reserve contributions.

Description of planned use of MTW single fund flexibility

Seattle Housing Authority established an MTW Block Grant Fund under the original MTW Agreement and continues to use single-fund flexibility under the Amended and Restated MTW Agreement (as extended in 2016 through 2028). MTW Block Grant single-fund flexibility is important in supporting the agency's array of low-income housing programs and services, its local partnerships and to meet locally-defined needs. Seattle Housing Authority exercises its MTW authority to move funds and project cash flow among projects and programs, as the agency deems necessary to further its mission and strategic plan, cost objectives, statutory compliance and local housing needs.

The agency analyzes its housing, rental assistance, tenant and community services, sustainability services, administrative and capital needs annually through the budget process to determine the level of service and resource needs to meet the agency's strategic objectives. Seattle Housing Authority's single-fund flexibility allows allocation of MTW Block Grant revenues among Seattle Housing Authority's programs. This enables the agency to balance mixes of housing types, tenant services, administrative support and capital investments in preservation and development of low-income housing. It also enables the agency to tailor resource allocation to best achieve our cost, programmatic 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 single-fund authority is focused on activities in MTW communities, support of low-income housing development and preservation and services for Low-Income Public Housing and Housing Choice Voucher participants.

Examples are:

- 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.
- Youth tutoring, job training and recreational activities for high school youth,
- Aging in place services and leveraging health-related programs that provide participants with critical health care and stability services.
- Supporting SHA residents and participants on their journey toward self-sufficiency and evaluating ways to improve housing stability.
- Parks and open spaces for our low-income communities with play opportunities for children, active and team sports activities for youth and passive and active exercise options for all.
- Planning, pre-development, construction and construction services for asset preservation, public housing redevelopment and opportunities to increase affordable housing for low-income people.

The MTW Block Grant will enable Seattle Housing Authority to:

- Provide transitional funding for services at Yesler until an endowment is established to fund health, education, employment service and other supportive services.
- Continue investment in a multi-year right sizing program to house more families seeking limited 2-3 bedroom units.
- Design and demonstrate landlord incentives to lease to and retain voucher participants in safe decent housing.
- Enhance SHA's housing stability activities to demonstrate benefits and cost effectiveness of a dedicated team of public and behavioral health experts providing crisis intervention, treatment and referrals and case management of public housing residents referred for service.
- Implement modifications and enhancements to SHA information technology environment to address needs revealed by impacts of the COVID-19 virus and changes in operation and workplace policies and protocols.
- Fund planning, feasibility studies and concept work before a project is selected for predevelopment.
- Close funding gap for major rehabilitation work planned for Jefferson Terrace, SHA's largest public housing high-rise with 299 units.

These commitments will be updated further when adjustments to the carry-on budget are implemented.

Local asset management plan

Is SHA allocating costs within statute?	Yes
Is SHA implementing a local asset management plan (LAMP)?	Yes
Has SHA provided a LAMP in the appendix?	Yes

If SHA has provided a LAMP in the appendix, please describe any proposed changes to the LAMP in 2021 or state that SHA does not plan to make any changes in 2021.

Pursuant to the requirements of OMB Super Circular Part 200, the Indirect Service Fee (IDSF) is determined in a reasonable and consistent manner based on projected total units and leased vouchers. The IDSF is a per-housing-unit or per-leased-voucher fee per month charged to each program. For the 2021 carry-on budget per unit costs will remain unchanged from 2020 at

\$59.44 per unit month (PUM) and \$25.98 for leased vouchers. The Adjusted Budget will occur in by Q1 of 2021 and will reflect updates to the per unit month (PUM) costs for housing units and leased vouchers.

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

No other changes are proposed.

Rental Assistance Demonstration (RAD) participation

Description of RAD Participation

N/A

Has SHA submitted a RAD Significant Amendment in the appendix?
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No

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

(VI) Administrative

Board Resolution and Certifications of Compliance

SHA's Board of Commissioners voted on the adoption of the Annual MTW Plan on October 12, 2020. The signed Resolution, Certifications of Compliance and lobbying disclosure form are included in Appendix C of this document. Also included in this appendix is the Certification of Consistency with the Consolidated Plan (Form HUD-2991).

Documentation of public process

The public comment period for the MTW Annual Plan began on August 28, 2020 and concluded on September 28, 2020. Extensive efforts were made to make tenants and the public aware of the availability of the Plan and comment period, including posting in the *Daily Journal of Commerce*, messages in our e-newsletters that reach thousands and flyers in buildings and common areas (where practical due to COVID-19). The draft plan was made publicly available on SHA's website (www.seattlehousing.org) or by requesting a copy. A public hearing was held remotely via remote audio/video conferencing service on September 15, 2020 at 5:00 p.m. Language interpretation and disability accommodations were available by request. One member of the public joined the public hearing but declined to comment.

Staff also met remotely with the two resident advisory groups, the Joint Policy Advisory Committee and Senior Joint Policy Advisory Committee, at a combined meeting on September 22, 2020 to discuss the Plan activities and proposed updates. Approximately 25 residents were present to engage in the materials and ask questions. Documentation of this process was presented to the Board of Commissioners at the October 5, 2020 Board Briefing and can be made available to HUD upon request.

Planned and ongoing evaluations

SHA is not currently engaged in any third-party agency-wide evaluations of its MTW program. No external evaluations are planned for 2021.

Lobbying disclosures

The signed Certificate of Payments (Form HUD-50071) is included in Appendix C of this document.

Appendix A: Planned existing project-based voucher units

The below table consists of the tenant-based vouchers that SHA is currently project-basing in 2020. This section meets the requirements prescribed in HUD Form 50900 Section II.A.iv "Planned Existing Project Based Vouchers."

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
104 th St. Townhomes	3	Leased/Issued	No	Affordable housing
A Place of Our Own	19	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Albion Place	12	Leased/Issued	No	Enhanced behavioral health services
Aldercrest	8	Leased/Issued	No	Affordable housing
Almquist Apartments	52	Leased/Issued	No	Permanent supportive housing
Arbora Court	40	Leased/Issued	No	Service-enriched for homeless individuals
Aridell Mitchell Home	6	Leased/Issued	No	Affordable housing
Aurora House	30	Leased/Issued	No	Permanent supportive housing
Avalon Place	9	Leased/Issued	No	Permanent supportive housing
Baldwin Apartments	15	Leased/Issued	No	Affordable housing
Beacon House	6	Leased/Issued	No	Service-enriched for homeless individuals
Bellevue/Olive Apartments	5	Leased/Issued	No	Affordable housing
Bergan Place	2	Leased/Issued	No	Homeless young adults
Bergan Place	8	Leased/Issued	No	Affordable housing
Brettler Family Place I	51	Leased/Issued	No	Affordable housing
Brettler Family Place II	21	Leased/Issued	No	Service-enriched for homeless families and individuals
Broadway Crossing	10	Leased/Issued	No	Affordable housing
Broadway Crossing	9	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Bush Hotel	7	Leased/Issued	No	Affordable housing
Casa Pacifica	11	Leased/Issued	No	Affordable housing
Cascade Court Apartments	3	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
Cascade Court Apartments	5	Leased/Issued	No	Affordable housing
Cate Apartments	10	Leased/Issued	No	Affordable housing
Cate Apartments	15	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Centerwood Apartments	2	Leased/Issued	No	Affordable housing
Colonial Gardens	20	Leased/Issued	No	Affordable housing
Columbia Court	13	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Colwell Building	21	Leased/Issued	No	Affordable housing
Community Psychiatric Clinic	14	Leased/Issued	No	Enhanced behavioral health services
Compass Broadview	18	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Compass Cascade	33	Leased/Issued	No	Permanent supportive housing
Compass on Dexter	36	Leased/Issued	No	Service-enriched for homeless individuals
CPC 10 th Ave. NW	5	Leased/Issued	No	Enhanced behavioral health services
CPC Alderbrook	6	Leased/Issued	No	Enhanced behavioral health services
Crestwood Place Apartments	6	Leased/Issued	No	Affordable housing
Croft Place	7	Leased/Issued	No	Affordable housing
David Colwell Building	25	Leased/Issued	No	Affordable housing
Dekko Place	5	Leased/Issued	No	Affordable housing
Delridge Heights Apartments	3	Leased/Issued	No	Affordable housing
Delridge Triplexes	6	Leased/Issued	No	Affordable housing
Denny Park Apartments	5	Leased/Issued	No	Affordable housing
Denny Park Apartments	8	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
DESC – PACT	12	Leased/Issued	No	Enhanced behavioral health services
Eastern Hotel	4	Leased/Issued	No	Affordable housing
Eastlake Supportive Housing	25	Leased/Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
Emerald City Commons	12	Leased/Issued	No	Affordable housing
Ernestine Anderson Place	33	Leased/Issued	No	Service-enriched for homeless individuals
Estelle Supportive Housing	15	Leased/Issued	No	Permanent supportive housing
Evans House	49	Leased/Issued	No	Permanent supportive housing
Fir Street Apartments	7	Leased/Issued	No	Affordable housing
First Place	4	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Four Freedoms House	25	Leased/Issued	No	Senior housing
Fremont Solstice Apartments	6	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Gardner House	6	Leased/Issued	No	Permanent supportive housing
The Genessee	17	Leased/Issued	No	Affordable housing
The Genessee	3	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Gossett Place	40	Leased/Issued	No	Permanent supportive housing
Hilltop House	30	Leased/Issued	No	Senior housing
Hoa Mai Gardens	70	Leased/Issued	No	Affordable housing
Holden Manor	1	Leased/Issued	No	Affordable housing
Holden Street Family Housing	25	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Holiday Apartments	6	Leased/Issued	No	Affordable housing
Humphrey House	71	Leased/Issued	No	Permanent supportive housing
Imani Village	8	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Josephinum Apartments	25	Leased/Issued	No	Service-enriched for homeless individuals
Josephinum Stability Project	49	Leased/Issued	No	Service-enriched for homeless individuals
Judkins Park	4	Leased/Issued	No	Affordable housing
Judkins Park	4	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
The Julie Apartments	28	Leased/Issued	No	Affordable housing
The Karlstrom	17	Leased/Issued	No	Service-enriched for homeless individuals
Kebero Court	83	Leased/Issued	No	Affordable housing
Kenyon Housing	18	Leased/Issued	No	Permanent supportive housing
Kerner-Scott House	15	Leased/Issued	No	Permanent supportive housing
Kingway Apartments	16	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Lake City Commons	15	Leased/Issued	No	Affordable housing
Lake Washington Apartments	37	Leased/Issued	No	Affordable housing
Lakeview Apartments	26	Leased/Issued	No	Affordable housing
Lam Bow Apartments	30	Leased/Issued	No	Affordable housing
Legacy House	22	Leased/Issued	No	Senior housing
Leschi House	35	Leased/Issued	No	Senior housing
Lincoln Apartments	4	Leased/Issued	No	Affordable housing
Lyon Building	12	Leased/Issued	No	Permanent supportive housing
Main Street Apartments	2	Leased/Issued	No	Affordable housing
Main Street Place	8	Leased/Issued	No	Affordable housing
Marion West	25	Leased/Issued	No	Affordable housing
Martin Court	28	Leased/Issued	No	Service-enriched for homeless individuals
Martin Court	13	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Family Housing	10	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Martin Luther King Housing	5	Leased/Issued	No	Affordable housing
Martin Luther King Properties	6	Leased/Issued	No	Affordable housing
Mary Avenue Townhomes	8	Leased/Issued	No	Affordable housing
McDermott Place	25	Leased/Issued	No	Permanent supportive housing
Meadowbrook View Apartments	15	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
Mercer Court	3	Leased/Issued	No	Affordable housing
Monica's Village Place	38	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Montridge Arms	13	Leased/Issued	No	Affordable housing
Morrison Hotel	190	Leased/Issued	No	Permanent supportive housing
Muslim Housing	10	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Nhon's Housing	5	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Nihonmachi Terrace	20	Leased/Issued	No	Affordable housing
Nihonmachi Terrace	5	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Norman Street Apartments	15	Leased/Issued	No	Affordable housing
NP Hotel	5	Leased/Issued	No	Affordable housing
Oleta Apartments	6	Leased/Issued	No	Affordable housing
One Community Commons	5	Leased/Issued	No	Affordable housing
One Community Commons	7	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Opportunity Place	145	Leased/Issued	No	Permanent supportive housing
Ozanam House (formerly Westlake II)	29	Leased/Issued	No	Permanent supportive housing
Pacific Hotel	4	Leased/Issued	No	Permanent supportive housing
Palo Studios at the Josephinum	7	Leased/Issued	No	Service-enriched for homeless individuals
Pantages Apartments	10	Leased/Issued	No	Affordable housing
Pantages Apartments	11	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Pardee Townhomes	3	Leased/Issued	No	Affordable housing
Park Place	136	Leased/Issued	No	Assisted living
Parker Apartments	8	Leased/Issued	No	Affordable housing
Parkview Services	23	Leased/Issued	No	Affordable housing for people with disabilities
Pat Williams Apartments	20	Leased/Issued	No	Permanent supportive housing

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
Patricia K. Apartments	12	Leased/Issued	No	Permanent supportive housing
Patrick Place	40	Leased/Issued	No	Permanent supportive housing
Pioneer Human Services	20	Leased/Issued	No	Enhanced behavioral health services
Plymouth on First Hill	77	Leased/Issued	No	Permanent supportive housing
Plymouth on Stewart	74	Leased/Issued	No	Permanent supportive housing
Plymouth Place	70	Leased/Issued	No	Permanent supportive housing
Raven Terrace	50	Leased/Issued	No	Affordable housing
Ravenna Springs Properties	13	Leased/Issued	No	Affordable housing
Red Cedar	80	Leased/Issued	No	Affordable housing
Rose of Lima House	30	Leased/Issued	No	Permanent supportive housing
Rose Street Apartments	4	Leased/Issued	No	Affordable housing
Samaki Commons	12	Leased/Issued	No	Affordable housing
Samaki Commons	8	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Campus	18	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Sand Point Family Housing	21	Leased/Issued	No	Permanent supportive housing for families
Sea-Mar Family Housing	5	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
SHA-SFD Special Portfolio	1	Leased/Issued	No	Affordable housing
Simons Senior Housing Apartments	76	Leased/Issued	No	Permanent supportive housing
SLIHP – High Point	100	Leased/Issued	No	Affordable housing
SLIHP – Rainier Vista	23	Leased/Issued	No	Affordable housing
SLIHP – Tamarack Place	20	Leased/Issued	No	Affordable housing
Sound Mental Health	26	Leased/Issued	No	Enhanced behavioral health services
South Shore Court	9	Leased/Issued	No	Affordable housing
Spruce Street Apartments	10	Leased/Issued	No	Affordable housing

Property name	Number of project-based vouchers	Planned status at end of 2021	RAD?	Description of project
St. Charles Apartments	61	Leased/Issued	No	Permanent supportive housing
Starliter Apartments	6	Leased/Issued	No	Affordable housing
Stone Avenue Townhomes	4	Leased/Issued	No	Affordable housing
Stone Way Apartments	21	Leased/Issued	No	Affordable housing
Stone Way Apartments	14	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Sylvia Odom's Place	64	Leased/Issued	No	Permanent supportive housing graduates
Traugott Terrace	40	Leased/Issued	No	Service-enriched for homeless individuals in recovery
Tyree Scott Apartments	10	Leased/Issued	No	Affordable housing
Tyree Scott Apartments	6	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase I	17	Leased/Issued	No	Affordable housing
Views on Madison Phase I	10	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
Views on Madison Phase II	7	Leased/Issued	No	Affordable housing
Villa Park	5	Leased/Issued	No	Affordable housing
Village Square II Apartments	31	Leased/Issued	No	Affordable housing
Vivian McLean Place Apartments	4	Leased/Issued	No	Affordable housing
Westwood Heights East	22	Leased/Issued	No	Affordable housing
Willie London Properties	15	Leased/Issued	No	Service-enriched for homeless families (with at least one minor)
WSAH (formerly Longfellow/Wisteria)	19	Leased/Issued	No	Affordable housing
Yesler Court	5	Leased/Issued	No	Affordable housing
YWCA Women's Residence	15	Leased/Issued	No	Permanent supportive housing
YWCA Women's Residence	38	Leased/Issued	No	Permanent supportive housing for women

3,575

Planned total existing project-based vouchers

Appendix B: Local asset management plan

Introduction

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

Framework for SHA’s Local Asset Management Program

Mission and values

SHA was established by the City of Seattle under State of Washington enabling legislation in 1939. SHA provides affordable housing to over 32,000 low-income people in Seattle, through units SHA owns and operates or for which SHA serves as the general partner of a limited partnership and as managing agent and through rental assistance in the form of tenant-based, project-based and provider-based vouchers. SHA is also an active developer of low-income housing, redeveloping communities we own and operate and rehabilitating and preserving existing assets.

SHA operates according to the following mission and values:

Our mission

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

Our values

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

SHA owns and operates housing in neighborhoods throughout Seattle. These include the four large family communities of NewHolly and Rainier Vista in Southeast Seattle, High Point in West Seattle and Yesler in Central Seattle. In the past twenty years, SHA has undertaken redevelopment or rehabilitation of all four family communities, a new family community in Lake City and 23 of our public housing high-rise buildings, using mixed financing with low-income housing tax credit limited partnerships and/or American Recovery and Restoration Act (ARRA) funds. As of year-end 2021, SHA will be the general partner in 18 limited partnerships. SHA has

been in the process of creating two more partnerships and dissolving one of our existing LPs/ with sixteen in operation and one in construction.

SHA had approximately 610 employees and a total operating and capital budget that could reach \$400 million for calendar year 2021.

Overarching policy and cost objectives

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

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

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

Local Asset Management Program: Eight guiding principles

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

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

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

This principle has led to several administrative successes, including use of a single set of admissions and lease/tenant requirements for Low-Income Public Housing and project-based Housing Choice Voucher tenants in the same property. Similarly, we have

joint funder agreements for program and financial reporting and inspections on low-income housing projects with multiple local and state funders.

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

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

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

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

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

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

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

- All critical policy and program issues facing individual properties or applying to a single or multiple portfolios, from rent policy to smoke-free buildings to rules for in-home businesses.

- Portfolio reviews and follow-up, where the team convenes to review with property management staff how well properties are operating in relation to common performance measures (e.g. vacancy rates; turnover time); how the property is doing in relation to budget and key reasons for deviations; and property manager projections and/or concerns about the future.
- Annual assessment of capital repair and improvement needs of each property with property managers and area portfolio administrators in relation to five-year projections of capital preservation needs. This annual process addresses the capital needs and priorities of individual properties and priorities across portfolios.
- Review and preparation of the annual MTW Plan and Report, where key issues for the future are identified and discussed, priorities for initiatives to be undertaken are defined, and where evaluation of MTW initiatives are reviewed and next steps determined.

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

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

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

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

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

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

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

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

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

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

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

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

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

The Fleet service fee encompasses vehicle insurance, maintenance, and replacement. Fuel consumption is a direct cost to send a direct conservation signal. The maintenance component of the fleet charge is based on a defined maintenance schedule for each

vehicle given its age and usage. The replacement component is based on expected life of each vehicle in the fleet, a defined replacement schedule, and replacement with the most appropriate vehicle technology and conservation features.

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

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

LAMP implementation

Comprehensive operations

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

- We apply our indirect service fees to all our housing and rental assistance programs;
- We expect all our properties, regardless of fund source, to be accountable for property-based management, budgeting, and financial reporting;
- We exercise MTW authority to assist in creating management and operational efficiencies across programs and to promote applicant and resident-friendly administrative requirements for securing and maintaining their residency; and,
- We use our MTW block grant flexibility across all of SHA's housing programs and activities to create the whole that best addresses our needs at the time.

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

Project-based portfolio management

We have reflected in our guiding principles above the centrality of project/property-based and program-based budgeting, management, reporting and accountability in our asset management program and our implementing practices. We also assign priority to our multi-disciplinary central Asset Management Team in its role to constantly bring best practices, evaluations, and follow-

up to inform SHA's property management practices and policies. Please refer to the section above to review specific elements of our project-based accountability system.

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

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

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

Cost allocation approach

Classification of costs

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

Cost objectives

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

- Cost-effective affordable housing.
- Housing opportunities and choice.
- Resident financial security and/or self-sufficiency.

Costs that can be identified specifically with one of the three objectives are counted as a direct cost to that objective. Costs that benefit more than one objective are counted as indirect costs.

Attachment 1 is a graphic representation of SHA's LAMP, with cost objectives, FDS structure and SHA Funds.

Direct costs

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

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

Indirect costs

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

- Executive
- Communications
- Most of Legal

- Development (most Development staff charge directly to the Development Fund; only certain staff and functions in this department are indirect charges)
- Finance
- Purchasing
- Human Resources
- Most of Housing Finance and Asset Management (based on functions, this staff is split among indirect cost, direct charge to the capital budget and charges to MTW direct property services)
- Administration staff and related expenses of the Housing Operations Department that cannot be identified to a specific cost objective

Indirect service fee: Base, derivation and allocation

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

Equitable distribution base

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

Derivation and allocation

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

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

A per unit cost is calculated using the remaining net indirect costs divided by the number of units and the number of leased vouchers. For the 2021 carry-on budget, the per unit cost will remain unchanged at the per unit per month (PUM) cost for housing units at \$59.44 and for leased vouchers at \$25.98. The adjusted budget planned for the fourth quarter of 2020 and early 2021 will have updated costs per unit month and per leased voucher.

Annual review of ISF charges

SHA will annually review its indirect service fee charges in relation to actual indirect costs and will incorporate appropriate adjustments in indirect service fees for the subsequent year, based on this analysis.

Differences: HUD Asset Management vs. SHA Local Asset Management Program

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

- SHA determined to implement an indirect service fee that is much more comprehensive than HUD's asset management system. HUD's asset management system and fee for service is limited in focusing only on a fee for service at the Low-Income Public Housing (LIPH) property level. SHA's LAMP is much broader and includes other affordable housing and other activities not found in traditional HUD programs. SHA's LAMP addresses the entire SHA operation.
- SHA has defined its cost objectives at a different level than HUD's asset management program. SHA has defined three cost objectives under the umbrella of the MTW program, which is consistent with the issuance of the CFDA number and with the current MTW Contract Agreement (expires 12/31/2028). HUD defined its cost objectives at the property level and SHA defined its cost objectives at the program level. Because the cost objectives are defined differently, direct and indirect costs will be differently identified, as reflected in our LAMP.
- HUD's rules are restrictive regarding cash flow between projects, programs, and business activities. SHA intends to use its MTW resources and regulatory flexibility to move its MTW funds and project cash flow among projects without limitation and to ensure that our operations best serve our mission, our LAMP cost objectives, and ultimately the low-income people we serve.
- HUD intends to maintain all maintenance staff at the property level. SHA's LAMP reflects a cost-effective balance of on-site and central maintenance services for repairs, unit turnover, landscaping, and asset preservation as direct costs to properties.
- HUD's asset management approach records capital project work-in-progress quarterly. SHA's capital projects are managed through central agency units and can take between two and five or more years from budgeting to physical completion. Transfer of fixed assets only when they are fully complete and operational best aligns responsibility for development and close-out vs. housing operations.

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

Balance sheet accounts

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

- Cash
- Petty cash
- Prepaid expenses and deferred charges
- Materials inventory
- Contract retention
- Other Post-Employment Benefits (OPEB) liability
- Pension liability or asset
- Deferred inflows and deferred outflows

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

Enclosures:

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

Attachment 2: 2020 Indirect Services Fee plan

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

Appendix B: Attachment 1

SHA cost objectives, FDS reporting structure and SHA funds

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

Direct cost objectives		Housing						Rental assistance	Community services
FDS columns	MTW	Indirect services costs	AMPs	Other housing	Other business activities	LP component units	MF developments & home ownership	Other housing	Other business activities
Funds	Capital WIP unallocated costs IT capital projects 100 480	400	Various, including LIPH portion of LP CUs	104 122 127 137 193/216 352-354 357 591 750 754	190 194 195 198 199 450 470	19 LPs LIPH portion reported in AMPs	700 704-709 711-712 718-719 723-747	139 168	125 CS grants

Fund name	Fund number
General	100
Seattle Senior Housing	104
Market Terrace	122
Bayview Tower	127
Ref 37	137
Housing Choice Vouchers	139
Mod Rehab	168
Local fund	190
Local housing program	193/216
House ownership	194
SHA land and parks	195
Development	198
Wakefield	199
Holly II and III	352-353
Rainier I	354
High Point North	357
Indirect services costs	400
Impact Property Services	450
Impact Property Management	470
MTW fund	480
Baldwin	591
New acquisitions	750
Northgate	754
MF developments & home ownership	700-747

Appendix B: Attachment 2

Indirect cost allocation plan: Calendar year 2021

Department		2021 Carry-on budget	All units	Hard units only
Executive total		2,544,141	2,544,141	
Asset Management		336,203		336,203
Finance		4,222,294	4,222,294	
Housing Operations		2,032,058		2,032,058
HCV		123,339	123,339	
HR: Allocated based on staff		2,148,596	767,820	1,380,776
Prior year inc/exp reconciliation – expense		497,839	497,839	
Total		\$ 11,904,470	\$ 8,155,433	\$ 3,749,037
Percentage		100%	69%	31%
Less fixed revenues		(4,396,897)		
Remaining OH to allocate PUM		7,507,573	5,143,237	2,364,336
Units			16,498	5,888
PUM cost			\$25.98	\$33.46
PUM cost to equal burden units				\$25.98
PUM fee to hard units				\$59.44

Indirect revenue				2021 Estimate
Capital grant admin				1,463,853
MTW adjustment				1,000,000
10% of developer fee cash				150,661
LP management fees				1,121,470
Laundry fee revenue				149,000
Insurance dividend				160,000
City benefit reimbursement				101,913
Solid waste services				250,000
Total fixed revenues				\$ 4,396,897
Unit summary				Total
Housing units				5,888
Total vouchers			11,005	
Leased vouchers at 94.5% of utilization				10,395
Total Mod Rehab			430	
Divide by two for work equivalency				215
Total units				16,498

INDIRECT SERVICES FEE BY COMMUNITY

		Indirect Services Rates	
		Equal Burden Units	25.98
Low Income Public Housing		Hard Units	59.44
Development No.	Community Name	Units	2021 Carry-On
1	Yesler	0	-
9	Jefferson Terrace	299	213,271
13	Olive Ridge	105	74,894
15	Bell Tower	120	85,594
17	Denny Terrace	220	156,922
23	Westwood Heights	130	92,726
31	Tri Court	87	62,055
37	Jackson Park Village	41	29,244
38	Cedarvale Village	24	17,119
41	Holly Court	66	47,076
50	Scattered Sites	59	42,084
51	Scattered Sites	121	86,307
52	Scattered Sites	60	42,797
53	Scattered Sites	112	79,887
54	Scattered Sites	71	50,643
55	Scattered Sites	128	91,300
56	Scattered Sites	87	62,055
57	Scattered Sites	73	52,069
86	High Rise Rehab Phase I	704	502,149
87	High Rise Rehab Phase II	690	492,163
88	High Rise Rehab Phase III	587	418,695
92	Seattle Senior Housing North	231	164,768
93	Seattle Senior Housing South	138	98,433
94	Seattle Senior Housing Central	246	175,467
95	Seattle Senior Housing City Funded	346	246,795
Total Low Income Public Housing		4,745	3,384,514
Other Housing Programs			
127	Bayview Tower	100	69,432
201	127th & Greenwood	6	4,280
139	Rental Assistance	10,395	3,240,745
168	Mod Rehab	215	7,028
193	Local Housing Program	149	106,279
354	Rainier Vista I - Escallonia	184	131,244
357	High Point N	344	245,368
234	Ritz	30	21,398

352	New Holly II - Othello	96	68,475
353	NewHolly III - Desdemona	219	156,208
591	Baldwin Apartments	15	10,699
Total Other Housing Programs		11,753	4,121,157
Total Management Fee		16,498	7,505,670

Limited Partnership Units and Restricted Fee Units			
	Property	2021 Units	2021 Carry-On
089	731 Tamarack (RV)	83	59,163
0xx	736 RV III Northeast	118	84,691
085	733 High Point S	256	183,736
091	727 Lake City Village	86	56,760
Total HOPE VI Limited Partnerships		543	384,350
292	734 South Shore Apts fka Douglas	44	20,946
735	735 Aldercrest	36	19,440
738	738 1105 E Fir/Kebero	103	73,925
739	739 Leschi House	69	48,082
743	743 Raven LP	83	59,570
744	744 Hoa Mai Gardens	111	75,458
745	745 Red Cedar	119	78,540
746	746 Holly Park I Re-Redevelopment	305	214,915
0xxx	747 West Seattle LP	204	146,244
	Total Restricted Units	1,074	737,120
	Total	1,617	1,121,470

Appendix B: Attachment 3

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

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

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

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

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

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

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

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

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

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

Appendix C: Compliance documents

Board resolution 5195: Resolution approving the 2021 Moving to Work Annual Plan for the Seattle Housing Authority

Certifications of Compliance

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

Certification of Payments (Form HUD-50071)

RESOLUTION NO. 5195

**RESOLUTION APPROVING THE 2021 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 2021 (the "Plan") must be submitted to HUD by October 18, 2020, in the format outlined in HUD Form 50900 to enable SHA to fully use its MTW flexibility;

WHEREAS, the complete draft Plan was made available for public comment from August 28, 2020 to September 28, 2020 on SHA's website and in hard copy form;

WHEREAS, a public hearing on the Plan was held on September 15, 2020 and 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 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 Authority's 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 12th day of October, 2020.

CERTIFIED BY:

A blue ink signature of Paul D. Russell, written in a cursive style, positioned above a horizontal line.

Chair

A black ink signature of Andrew J. Felt, written in a cursive style, positioned above a horizontal line.

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 Chairman 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 (01/01/2021), 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, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the Plan is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15(d), which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, 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)(3). Until such time as the MTW PHA is required to submit an AFH, and that AFH has been accepted by HUD, the MTW PHA will address impediments to fair housing choice identified in the Analysis of Impediments to fair housing choice 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.
- (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 identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (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 135.
- (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 OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 200.
- (21) 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.
- (22) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Seattle Housing Authority

WA001

MTW PHA NAME

MTW PHA NUMBER/HA CODE

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).

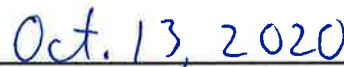
Paul Purcell

Chair, Board of Commissioners

NAME OF AUTHORIZED OFFICIAL

TITLE





SIGNATURE

DATE

***** *Must be signed by either the Chairman 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 Chairman 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.
clearly print the following information:)

ApplicantName: Seattle Housing Authority

ProjectName: Moving to Work Demonstration Program

Location of the Project: N/A

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: Dan Burton

Title: Federal Grants Manager

Signature: 

Date: 10/15/2020

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. 03/31/2020)

Applicant Name

Program/Activity Receiving Federal Grant Funding

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Title

Signature



Date (mm/dd/yyyy)

October 12, 2020