Department of Commerce

Policy Advisory Team
March 22, 2017
Olympia, WA

Meeting Summary

Participants:
Chris Pegg-PAT Chair, Jim Baumgart-Policy Advisor to the Governor, Diane Klontz-Commerce, Corina Grigoras-Commerce, Trudy Soucoup-Homes First, Karen Peterson-THA, Holly Anderson-CCHS/Yakima, Ann Melone-US Bank, Lisa Vatske-WSHFC, Marty Miller-ORFH, Jon Brumbach-HCA, Renee Rooker-Walla Walla HA, David Stalheim-Everett, Mark Smith-HCBSC, Connie Brown-TPCAHC, Melora Sharts-City of Spokane, Darryl Reber-IERR/Spokane, Peggy Papsdorf-Pioneer Human Services, Tim Walter-King County HA, Ginger Segel-Community Frameworks, Laurie Olson-City of Seattle Housing Office, Michone Preston-Habitat for Humanity, Paul Trautman-City of Spokane, Debby Dover-Clack County Affordable Housing Consortium, Peggy Sheehan-City of Vancouver, Jackie Anderson-Snohomish County, Maureen Fife-Tacoma Habitat for Humanity, Mark Ellerbrook-King County, Lisa Byers-OPAL, Kathleen Hosfeld-Homestead CLT, Mark Gropper-Renton HA, Dean Fearing-Kulshan CLT, Bob Thompson-Pioneer Human Services, Jason Davidson-Commerce, Nathan Peppin-Commerce, Sean Harrington-Commerce, Sharon Robinson-Commerce, Rebecca Spencer-Commerce, Dever Haffner-Ratliffe-Commerce, TyeRae Guined-Commerce

Remote Participants:
Joel Ing-Edge Developers, Tom Jacobi-HomeSight WA, Ken Katahira-Snohomish County, Robin Koskey-Seattle, Megan Adams-Imagine Housing, Cindy Proctor-Beacon, Samya Lutz-City of Bellingham, Rebecca McCrary-Everett, Samantha Whitley-Clark County, Marty Kooistra-Affordable Housing Consortium, Jaclyn Moynahan-King County, Patrick Tippy-CCSWW, Seth Benziger-Impact Capital, Dale Miller-CAC Whitman, Tanya Jimenez-King County, Klaas Nijhuis-Bellevue

Agenda Item	Key Discussions/Decisions
Introductions	Members and participants welcomed by Chris Pegg. Introductions made and many new faces in attendance.
Department of Commerce Updates -Diane Klontz	Commerce's Assistant Director complimented everyone who has been working with Commerce during the Legislative session and with breaking down the budget proposals. Diane notified PAT of the change of AHAB Lead Policy Advisor from Cary Retlin to Emily Grossman, and gave a short overview on the new AHAB subcommittee, Housing Affordability Response Team (HART). She also provided an update regarding the Needs Study directed by AHAB, which is about to undergo a new update. Commerce and the Housing Finance Commission have committed funds to update the Study, reaching 40 percent of the $200,000 budget. If PAT members are interested in contributing funds to the Needs Study, they can contact Diane Klontz or Emily Grossman at Commerce for details.
Governor's Policy Advisory Update	Jim Baumgart, Policy Advisor to Governor Jay Inslee, joined PAT to discuss the application scoring criteria and commend the PAT committee and Commerce staff who worked on creating the new tool. He noted that there is a new expectation from the public, stakeholders, legislators, and "his boss" for government accountability and

-Jim Baumgart	transparency in its processes. The HTF has a stellar reputation and track record and it is important to add more clarity and fidelity to the process, particularly as our housing situation is getting tighter and tighter around the state. Jim and legislators support an objective way to fund projects and Commerce's continuing ability to meet the Governor's expectations. He continued to explain how transparency assists legislators, and the rest of the state government, that are faced with questions of how state dollars are used and accounted for. He thanked everyone who worked on this process and is looking forward to hear how the process will evolve over time.
2017 Application Round Update **National Housing Trust Fund Update** **-Corina Grigoras**	Corina Grigoras began with updates on the 2017 application round. 135 Stage 1 applications were received requesting approximately $235 million in HTF funds. The application process for Stage 1 is now optional and more simplified. It is not scored or evaluated by staff and Stage 1 will no longer be a pre-requisite to apply in Stage 2. However, applicants are encouraged to apply in Stage 1, as the list provides much-needed information to the other public funders and the Legislature about the statewide need and projects in the pipeline. Prior to Stage 2, staff will conduct application workshops on both sides of Washington, to walk through the new application criteria and scoring tool, answer questions, and provide clarifications as needed. Multi-family and homeownership applications were separate in the Stage 1 and will also be separate in Stage 2, due to feedback received from our applicants over the last few years. Commerce and the other combined funders are working on the Stage 2 homeownership application forms. The Stage 2 NOFA will likely publish in June/July or as soon as the capital budget is passed by the Legislature. The new scoring tool will only be applied to the multi-family rental applications. Commerce is working on the 2017 allocation plan for NHTF. Two stakeholder meetings were held in Olympia and Spokane to seek feedback for how to allocate NHTF funds. These stakeholders meetings were optional and were not intended to replace the formal HUD public comment period that will come in April/May, which will cover the NHTF as well as all other HUD formula grants that Commerce administers. Commerce will send out formal notices for the formal public comment period. HTF staff is also gathering a small focus group to discuss using NHTF funds for O&M, in addition to capital investments, in the new allocation plan. Homeownership received mixed feedback within these discussions, so unless the NHTF receives more funds, it will not be eligible to use at this time.
WLIHA's Legislative Agenda **-Michele Thomas**	The Alliance gave a brief update about the Senate and House Budgets coming out. Amendments may come to restore significant cuts to the budget. The Alliance made a strong push for advocacy due to unforeseen HTF cuts projected to come, and to specifically advocate for funds for the state as a whole and not for specific project set-asides. Advocate, advocate, advocate! The budgets are proposals at this point, but the Senate's Operating Budget eliminates the HEN program by reducing the target population for people needing funds. Earmarks of about $32 million projected to come out of homeless programs in Commerce. The Alliance updated PAT on multiple bills that could affect the affordable housing community. They will continue to follow these bills pushed through on their website under the Bills & Budget Tracker.
LIHTC Program Updates	LIHTC is involved and participating in the Tax Credit Reform discussion. There are implications from proposed bill provisions for the LIHTC program. The current environment on the Federal level seems to be that our State Senators and the LIHTC program are playing a lot of defense on the Hill right now and with the current market uncertainty, LIHTC projects are struggling to close deals. All of the outstanding 2016 LIHTC projects have a plan

-Lisa Vatske	worked out, so we expect that all of the projects will move forward. You will find the Allocation plan here. Upcoming policy discussions for the 2018 9% allocation round are underway. One of the policy considerations is looking at raising the lowest AMI to 35% due to rising minimum wages. LIHTC will hold stakeholder meetings in the near future and encourage all to attend.
Application Review Tool – Subcommittee Report **-Corina Grigoras**	Corina Grigoras presented the work and results of the subcommittee. A comprehensive subcommittee report was sent to PAT and interested parties prior to this PAT meeting. For the past 6-7 months, the HTF staff worked with a PAT subcommittee to create an evaluation tool for reviewing, scoring, and ranking *multi-family rental* applications. Its purpose is to aid the HTF staff with evaluating applications in an equitable and objective manner, and to provide a transparent process accessible to all interested applicants and stakeholders. The subcommittee included members selected by the PAT Chair and represented the various stakeholder groups from the affordable housing arena, encompassing both urban and rural areas, developers, HTF applicants, current contractors, public (city, county) and private funders, the Housing Finance Commission, and housing authorities, as well as four HTF staff members. **Process:** The subcommittee had seven meetings and spent many hours analyzing and discussing HTF funding requirements established in statute, policy (HTF Handbook), and through past and current practice. Current statute and policies formed the basis for this evaluation tool. However, the subcommittee discussed some policy items in more detail, resulting in proposed changes to be brought to the PAT for further discussion. Some of the discussions resulted in edits to the Handbook, particularly in the Chapter 3, which is dedicated to the application process. All edits were made in track changes and the file was sent to PAT and all interested parties in advance of this PAT meeting. As a few examples, we added more information about Commerce's discretion and process to issue waivers to threshold requirements, removed language about the process of receiving and submitting an electronic application, and noted that Stage 1 is no longer a pre-requisite for a Stage 2 submittal. HTF also updated the definition of "rural" in the Handbook, to re-align it with the Commission's definition. While not every single scored criterion in this tool received unanimous support, the subcommittee collectively agreed that the evaluation tool was acceptable for moving forward, with the understanding that HTF staff will continue to seek stakeholder input while they continue to test, fine-tune, and adjust it as needed every year, in order to ensure that it will achieve its intended results. The project evaluation criteria is expected to evolve over the years, as HTF staff seek to align it to new priorities (e.g., Capital Budget), and to the ever-changing landscape of affordable housing and homelessness in our state. If this tool does not achieve the results it was intended to achieve, HTF staff will adjust it to ensure that only the most competitive projects that have local support, are fully funded, are construction-ready, and that meet the state's priorities and requirements receive funding. HTF staff will ensure that the evaluation criteria is described in detail in the annual Notices of Funding Availability (NOFAs).

HTF staff will conduct application workshops to engage the applicants early in the application process, and to provide an opportunity for HTF staff to receive feedback, answer questions, provide clarification, and help applicants better understand Commerce's expectations and funding priorities.

After the subcommittee developed the evaluation tool, HTF staff tested it on all of the 2016 applications. (Note that the test was conducted in January 2017, *after* the actual awards were made in December 2016.) We were pleasantly surprised that the test results largely mirrored those arrived at by the historical method (i.e., without numerical scoring) used by HTF staff to make actual funding decisions in 2016.

Tool description:
The HTF has a statutory requirement to allocate 30 percent of its competitive funds to rural projects. When reviewing applications, HTF separates projects into a rural category and an urban category. The urban category is further subdivided between King County projects and other urban projects. The practice has been to allocate *approximately* one-third of the funds to each of the three categories: rural, King County, and other urban. HTF staff will continue to separate projects into these three categories, such that projects will only compete against other projects in the same geographic category.

The new evaluation tool is comprised of three phases representing the three main decision points in the evaluation process, as follows.

- Decision Point #1 applies a series of thresholds that each application must meet in order to be eligible for funding and move forward in the evaluation process. These include: timely and complete application submittal, eligible applicant and activities, organization in good standing, amount requested, readiness (site, zoning, services, long-term operations), and min. ESDS. Not meeting the thresholds may mean that an application will not be reviewed for funding. In extraordinary circumstances, Commerce will exercise its discretion in issuing threshold waivers and will make all waivers public. The waiver process is described in the HTF Handbook.

- Decision Point #2 applies a series of priorities, each with a set of scoring weights assigned to the criteria applicable to multi-family projects. This will result in three ranked lists of projects, one for each of the three geographic categories. Priorities include: population served, source of housing stock, need & local priority, development costs, level of HTF investment, project scope and housing model, opportunity-rich communities, and ESDS. Projects can receive a maximum of 100 base points, plus another 1 to 2 bonus points for projects exceeding the minimum ESDS. *It is important to regard these scored priorities as a "sum total" rather than as individual scores that can determine a project's likelihood for funding.* Where there are multiple—sometimes conflicting—requirements at play, a project may score well in one category but not in another. For example, a project may receive low scores in leverage and development costs but receive high scores in population and scope; a low leverage score—on its own—will not decide the project's funding.

- Decision Point #3 serves as a final threshold, or filter, to determine the viability of a project. If the project has public local (city, county) or other state (e.g., CDBG) funding, Commerce coordinates with the other public funders to assess local priority for the project and to ensure that *only fully funded* projects move forward. Funds must be committed, awarded, or in-hand at the time of the HTF award. For a tax credit project, an HTF award will be conditional on an LIHTC allocation in the current round sufficient to complete the project; otherwise, HTF funds may be withdrawn after the LIHTC allocations are announced. Commerce coordinates with the Housing Finance Commission and reviews the LIHTC self-scores (submitted by applicants in their HTF application), which are helpful in determining the likelihood for tax credit projects to receive LIHTC allocations within their respective LIHTC pools. If the project has no local or other funding (only HTF), the full funding threshold may not apply. This decision point may include other special requirements or circumstances, such as meeting federal requirements, local government prioritization of projects, funding special proviso projects, and availability of funds.

Discussions took place to:
- **address** a resident engagement factor in the application and evaluation process. HTF staff will plan to add a new question about resident engagement in Section 2 of the HTF addendum, as part of the "opportunity rich communities" section. This will help staff in the evaluation of the project scope & housing model criterion.
- **address** previous concerns regarding the local need points & determination section of Decision Point #2. HTF staff indicated that this topic was heavily discussed with the subcommittee and assured members that this criterion carries a lot of weight in Decision Point #3, rather than Decision Point #2, where a project is vetted with the local public funders (as applicable) or where a locality that has several projects in the funding round can have an opportunity to prioritize its projects.
- **address** whether or not earmarks are taken into account when scoring projects. There was large support in the room to include the earmark amount in the leverage and investment calculations. HTF staff confirmed that, unless restricted by legislation, earmarks would be calculated into the "state investment" amount and included in the application scoring tool.
- **address** how to protect the viability of long-term projects with minimum wage inflation looming. Suggestions were made to update the pro-forma or extend it, or to incorporate these concerns in the application or tool. Discussion ensued that a 30-year pro-forma was part of the application forms in the past, but stakeholders and HTF staff agreed that no project can make realistic assumptions for operations that far out. HTF staff indicated that the combined funders (who work together on the combined funder application forms every year) may want to continue on these discussions.
- **address** the balance between different geographic pools and how they are scored. Commerce will continue to compare projects within similar project pools, as it has always done in the past. There is no exact formula of how funds will be distributed between the pools, however, the RCW requires that 30% of the funds in a funding cycle benefit rural projects.
- **address** concerns brought up regarding small, high-need projects that might not benefit from the scoring tool. HTF staff reassured members that this has not been happening and they will continue to run tests on

	past and current applications to ensure the tool is working as it should. In fact, when the tool was tested on the 2016 applications, the very large or LIHTC projects did not raise to the top of the scoring range. The way the population is scored allows for smaller projects to be competitive if they serve populations that are prioritized by the state. - **address** a suggestion to incorporate the scoring tool threshold items into the HTF addendum. Commerce will plan on including all thresholds in the NOFA, as well as the addendum.
Underwriting & Loans – Subcommittee Report **-Jason Davidson**	Discussions continue within the subcommittee revolving around implementing new processes for application and loan term sheets, and payment structures. The subcommittee will meet twice more before the June PAT meeting. They will present these new processes in the upcoming 2017 PAT meetings. PAT encourages members and all else to join and add their input.
Medicaid Waver Program Update **-Jon Brumbach**	The Medical Waiver Program changed their supportive housing target population and added more services to assist individuals. Jon Brumbach (HCA) presented the slides and also introduced Liz Prince and Melodie Pazolt (from DSHS), who have been working on starting up the program. Please refer to the presentation slides attached at the end of this summary for more information.
Affirmatively Furthering Fair Housing **-Tanya Mercier**	Commerce presented a "refresh" on their practices when it comes to implementing Accessibility and Anti-Discrimination to projects receiving funds from HTF or HOME. Please refer to the Compliance presentation slides attached at the end of this summary for more information.
Asset Management **Portfolio Preservation** **-Jason Davidson**	Commerce began on-site monitoring activities for 2017, in coordination with WSHFC and the other public funders. HFU staff will visit 200+ projects throughout the state during the monitoring season. PAT previously discussed the 10/28/16 notice from HUD proposing a requirement for flood insurance for any multi-family properties located on a 500-year floodplain. There has been no further action at the federal level. At this time, Commerce plans to leave the current policy in place and update procedures to clarify that flood insurance, or a flood certificate, is required for projects located on a 100-year floodplain.
Closing Remarks	Chris Pegg concluded the meeting and encouraged members and participants to attend every PAT meeting in-person.

Next PAT Meetings			
	June 14, 2017 9:00am – 12:00pm	Pacific Tower Seattle	PAT Only
	October 02, 2017 9:00am – 12:00pm	DoubleTree by Hilton Spokane	AHAB Meeting to follow PAT Meeting; Coincides with Housing Washington Conference
	December 05, 2017 9:00am – 12:00pm	Pacific Tower Seattle	AHAB Meeting to follow PAT Meeting

Medicaid Transformation Demonstration – Foundational Community Supports (FCS)

Department of Commerce Policy Advisory Team
March 22, 2017

Healthier WASHINGTON

Foundational Community Supports (FCS)

Supportive housing

Community Transition Services (NEW to FCS)	One-time supports for individuals transitioning out of institutions or at imminent risk of becoming institutionalized
	Includes rental deposit, move-in costs, household furnishings and other necessary supports
Community Support Services	Housing assessment and development of a plan to address barriers
	Assistance with applications, community resources, and outreach to landlords
	Education, training, coaching, resolving disputes, and advocacy

*Supportive housing services **do not** include funds for room and board or the development of housing.*

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Supportive housing target population

- Chronically homeless (HUD definition)

- Frequent/lengthy institutional contact

- Frequent/lengthy adult residential care stays

- Frequent turnover of in-home caregivers

- PRISM Score 1.5+

  - (Predictive Risk Intelligence System)

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WASHINGTON

Supported employment
Individual Placement and Support (IPS) model

Principles of supported employment

- Open to anyone who wants to work
- Focus on competitive employment
- Prioritize rapid job search
- Client preferences guide decisions
- Individualized long-term supports
- Integrated with treatment
- Benefits counseling included

Services may include

- Employment assessment and development of a plan to address barriers
- Assistance with applications, community resources and outreach to employers
- Education, training, coaching to maintain employment

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Supported employment target population

- Aged, Blind, Disabled (ABD)/Housing and Essential Needs (HEN)

- Individuals with severe and persistent mental illness, individuals with multiple episodes of inpatient substance use treatment and/or co-occurring

- Working age youth with behavioral health conditions

- Individuals receiving long-term services and supports

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Third Party Administrator

Medicaid funds flow previous model

Medicaid

Program oversight

HCA | BHA | ALTSA | Tribes

Payer

MCOs | BHOs | HCS/AAAs

Provider

SH/SE – Physical Health Conditions | SH/SE – Behavioral Health Conditions | SH/SE - LTSS | SH/SE – Tribal Members

Data

Healthier WASHINGTON
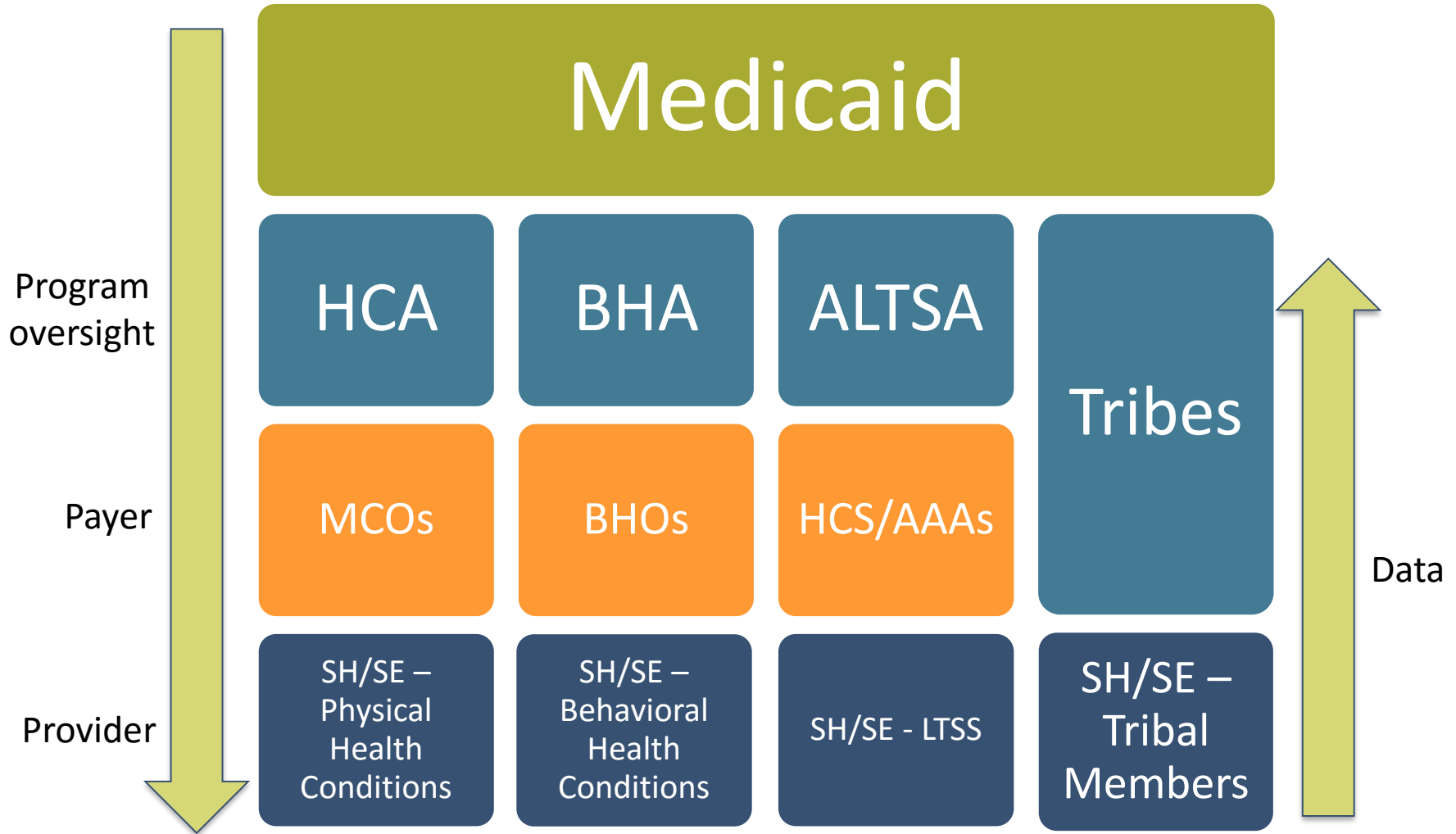
Medicaid funds flow
Current Model

Program oversight

Benefits administrator

Provider

Medicaid

HCA – DBHR – ALTSA

TPA

SH/SE - CBOs | SH/SE – Health care providers | SH/SE – Comm. BH Agencies | SH/SE – LTSS Providers | SH/SE – Tribal Providers

Data

Healthier WASHINGTON

9
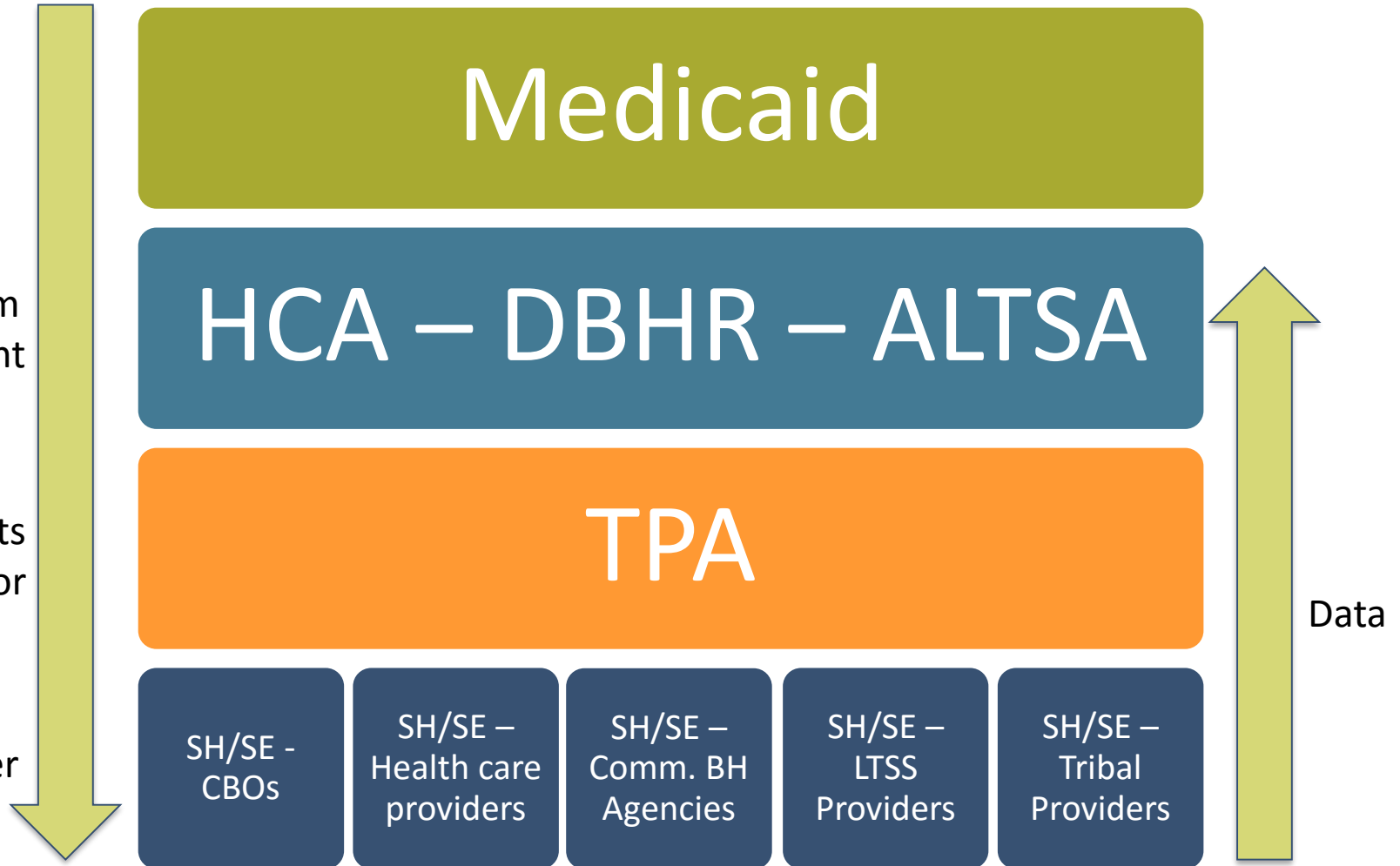
Third party administrator

- Single administrative entity for supportive housing & supported employment.
- No longer to be administered through MCOs, BHOs, LTSS

HOWEVER

- Services and target populations remain the same
- Providers previously eligible to provide the service

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What is a third party administrator?

- Contracted with the state
- Provides administrative oversight of benefit programs
  - Provider network development and maintenance
  - Service authorization
  - Distribution of reimbursement payments
  - Data/encounter tracking

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Why use a third party administrator?

For the demonstration

- Streamline administration and funds flow
- Monitor usage via single information source
- Single point of accountability
- Single data source for evaluation

For sustainability

- Build the program in order to transition to a sustainable model post-demonstration
  - Goal is to include managed care and fee-for-service components in the sustainability approach, post-third party administrator

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What does this mean for providers?

- Single contracting entity for both benefits

- HCA, BHA and ALTSA will continue to provide technical assistance and consultation

- Existing housing & employment providers (BH/LTSS) will still be able to provide FCS services
  - CBOs will also have opportunity to participate

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What does this mean for beneficiaries?

- Target populations remain the same
- Service array remains the same
- Single point of accountability
  - Benefit eligibility decisions
  - Service authorization
  - Appeals

Foundational Community Supports
Next steps

Foundational Community Supports protocol

- Protocol must be approved before services can be provided

Third party administrator

- Procurement will be released shortly

WAC

- HCA: Program authorization
- DBHR: Certification WAC

Initial provision of services to begin July 2017
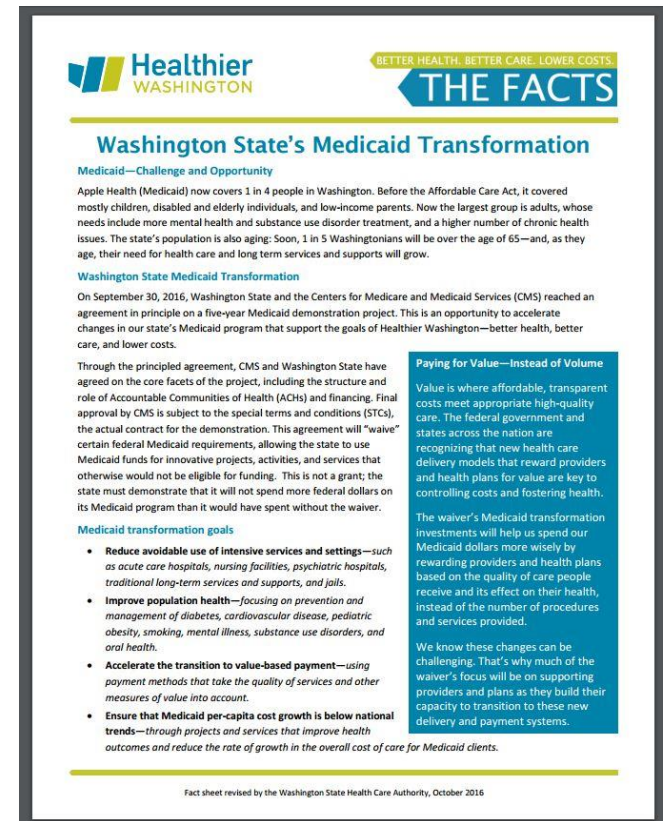
- Benefits will be provided statewide

Healthier WASHINGTON

Learn more

Medicaid Transformation webpage features:

- Demonstration videos
- Fact sheets
- Timeline
- Presentation slide deck

www.hca.wa.gov/hw

Questions?

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Join the Healthier Washington Feedback Network. Sign up at: hca.wa.gov/hw

Send questions to: medicaidtransformation @hca.wa.gov

What are we talking about?

Department of Commerce is subject to federal and state laws related to anti-discrimination in housing services and accessibility during the construction, rehabilitation, and on-going monitoring of rental housing funded with public monies.

EQUAL HOUSING
OPPORTUNITY

Department of Commerce

Who must comply?

- HUD-funded entities have an obligation to implement and monitor all Federal laws and standards related to anti-discrimination and fair housing.

- Affirmatively furthering the principles of these laws is a requirement of HUD funding.

- In addition, Department of Commerce is required to implement the laws of the State of Washington.

- All HTF, HOME, and NHTF funded projects must comply with applicable Federal and State laws related to anti-discrimination and accessibility.

Department of Commerce

What laws and standards apply?

- Title VI of the Civil Rights Act of 1964
- Section 504
    - Uniform Federal Accessibility Standard (UFAS)
- Federal Fair Housing Act (FFHA)
- Americans with Disabilities Act (ADA)
- Architectural Barriers Act (ABA)
- Washington State Laws for Fair Housing
- Residential Landlord Tenant
- Barrier-Free Facilities

Department of Commerce

What do we expect of our contractors?

- Recipients of public funds for the acquisition, construction and rehabilitation of housing are subject to requirements and standards that prohibit discrimination based on disability.

- Multiple requirements and standards may apply, in which case they must be viewed *collectively*.

- When conflicting, the greatest accessibility requirement prevails.

- The contractor is responsible to determine how to comply.

- Contractors must ensure the accessibility of the site, common use areas, and residential units by people with disabilities.

Department of Commerce

What are our current practices?

- **At application**: applicant indicates accessible units and features of the project.

- **At award**: Commerce expects that the units and accessible features indicated at application are followed through during the development of the project.

- **During construction**: A third-party inspector verifies UFAS and ADA standards and other building code requirements, and reports to Commerce.

- **After placed in service**: Compliance and asset managers monitor for long-term contractual compliance and conduct periodic on-site visits:
  - Pre-monitoring questionnaire
  - Particular attention to HOME projects
  - Physical inspections of accessible units and buildings open to the public

Department of Commerce

What are our current practices? (continued)

- Monitoring exit report may contain required actions or recommendations for compliance.
  - If accessibility issues are discovered, a third-party UFAS/ADA inspection is recommended.
  - If discriminatory practices are discovered, a plan of action to remedy this situation is required.
  - For all citations, contractors are responsible for submitting a corrective action plan within 30 days receipt of the Exit Report.

- Corrective action plans are reviewed for compliance and performance:
  - If the response does not meet expectations, additional information is requested.
  - Once agreed to and issues are remedied, Commerce closes the monitoring.

- Failure to submit a corrective action plan will cause the contractor to be out of compliance with their contractual obligation.

- At any point in the process, Commerce staff may engage HUD or Washington State Human Rights Commission in order to enforce anti-discrimination and accessibility requirements.

Department of Commerce

Additional Resources

Handout – Matrix: Accessibility and Anti-Discrimination Compliance in Multi-Family Projects.docx [06/07/2016]

Washington State Housing Trust Fund Handbook [10/19/2016]

http://www.commerce.wa.gov/wp-content/uploads/2015/12/hfu.htf_.handbook.october.19.2016.pdf

Federal Fair Housing Act and Americans with Disabilities Act

https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws/yourrights

Fair Housing Accessibility Guidelines

https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/fhefhag

Uniform Federal Accessibility Standards (UFAS)

https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/ufas

Fair Housing Accessibility FIRST

http://www.fairhousingfirst.org/index.asp

Washington State Human Rights Commission – Fair Housing

http://www.hum.wa.gov/fair-housing

Washington State Residential Landlord-Tenant Act
http://apps.leg.wa.gov/RCW/default.aspx?cite=59.18

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Thank you for your time!

For questions or more information contact:
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