



WASHINGTON STATE  
HOUSING FINANCE  
COMMISSION



# Metro Pool Interested Parties Meeting 9% Program Policy Discussion

*April 28, 2026*

# Agenda



- Introduction
- Recap on Engagement and Approach
- Policy Focus Areas
  - Discussion: Additional Low Income Set Aside, Priority Populations
  - Awareness: Additional Use Period, Energy, TOD, Job Centers
- Discussion
- Next Steps

# Recap from Past Engagement



## **Content Presented**

- Recent Portfolio Data showing impacts and affordability outcomes
- Alternative AMI targeting approaches by other HFAs

## **Feedback**

- Broad support for deep affordability goals
- Strong interest in additional flexibility
- Feasibility concerns for non-PSH projects within current scoring framework

## **Requests**

- Portfolio data further separated by geographic pools
- Additional engagement

# Policy Focus Area: Affordability



## Updated Data

- Additional data analysis by geographic pool

## Revisit Current Policy

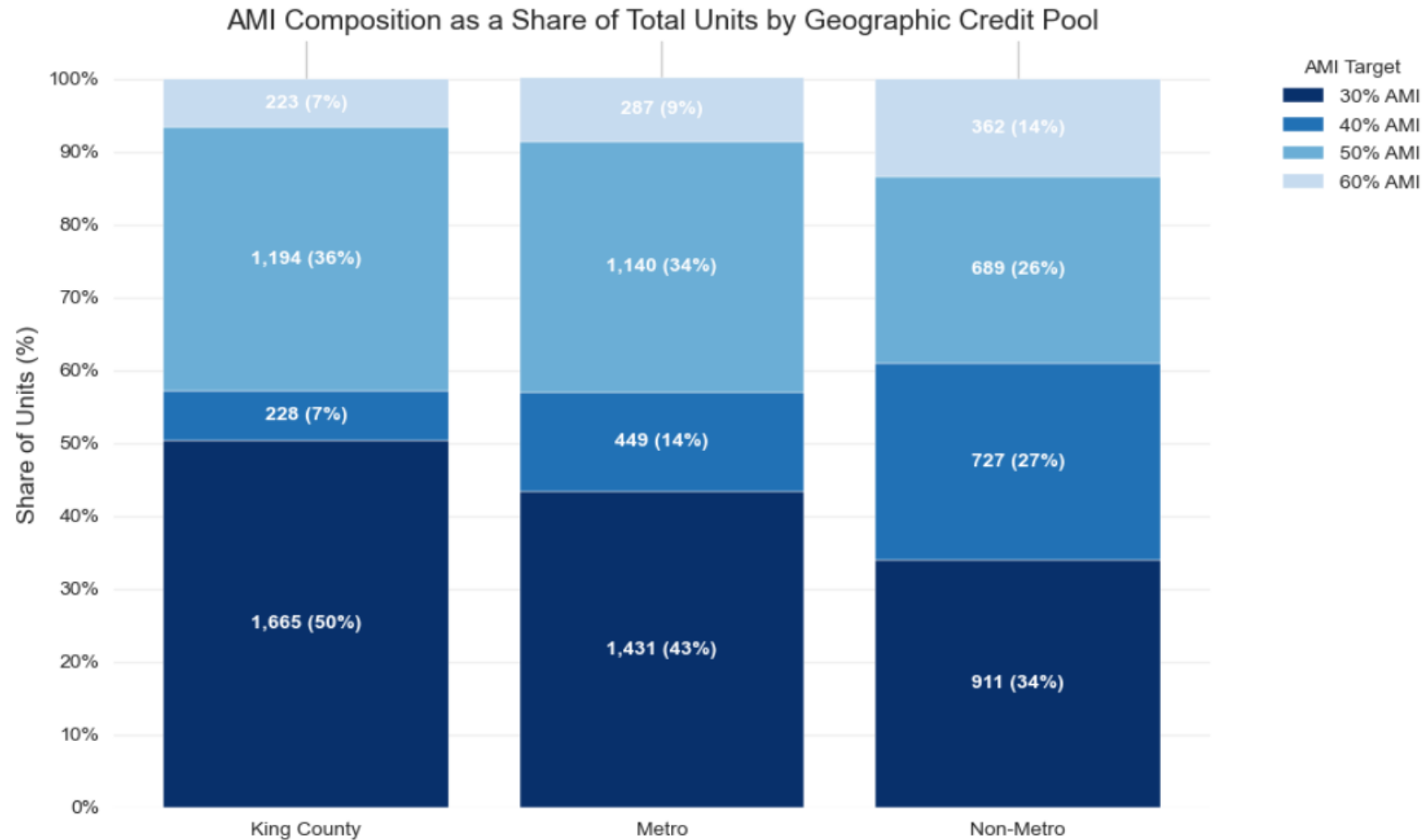
## Introduce Two Potential Ideas for Consideration

- General concept
- Differences/similarities from current policy
- Intended impacts

## Discuss

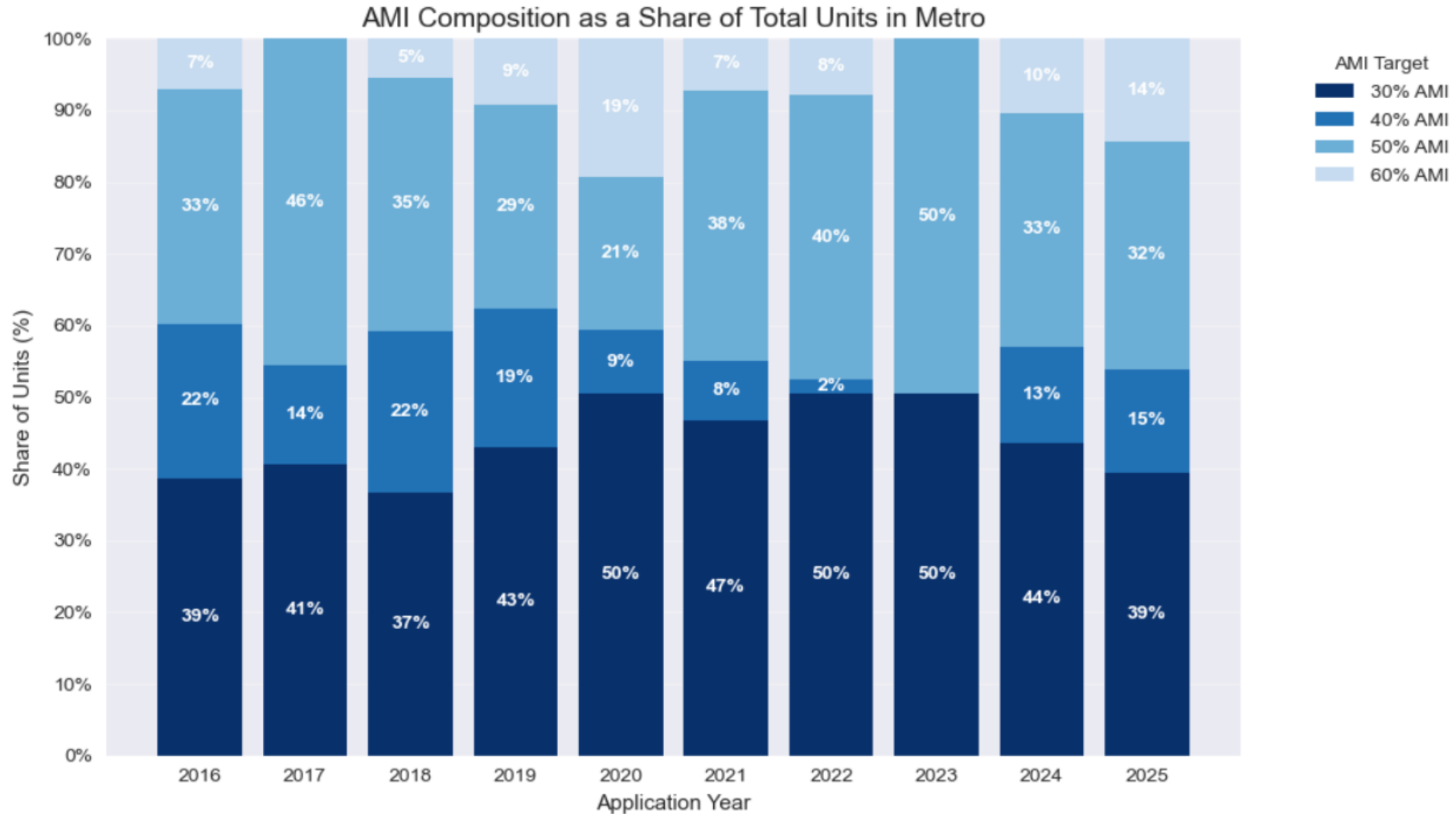
- Are either of these options an improvement from current policy?
- Do either of these options address the issues/barriers you face meeting the need in your area?

# AMI Composition Varies by Credit Pool



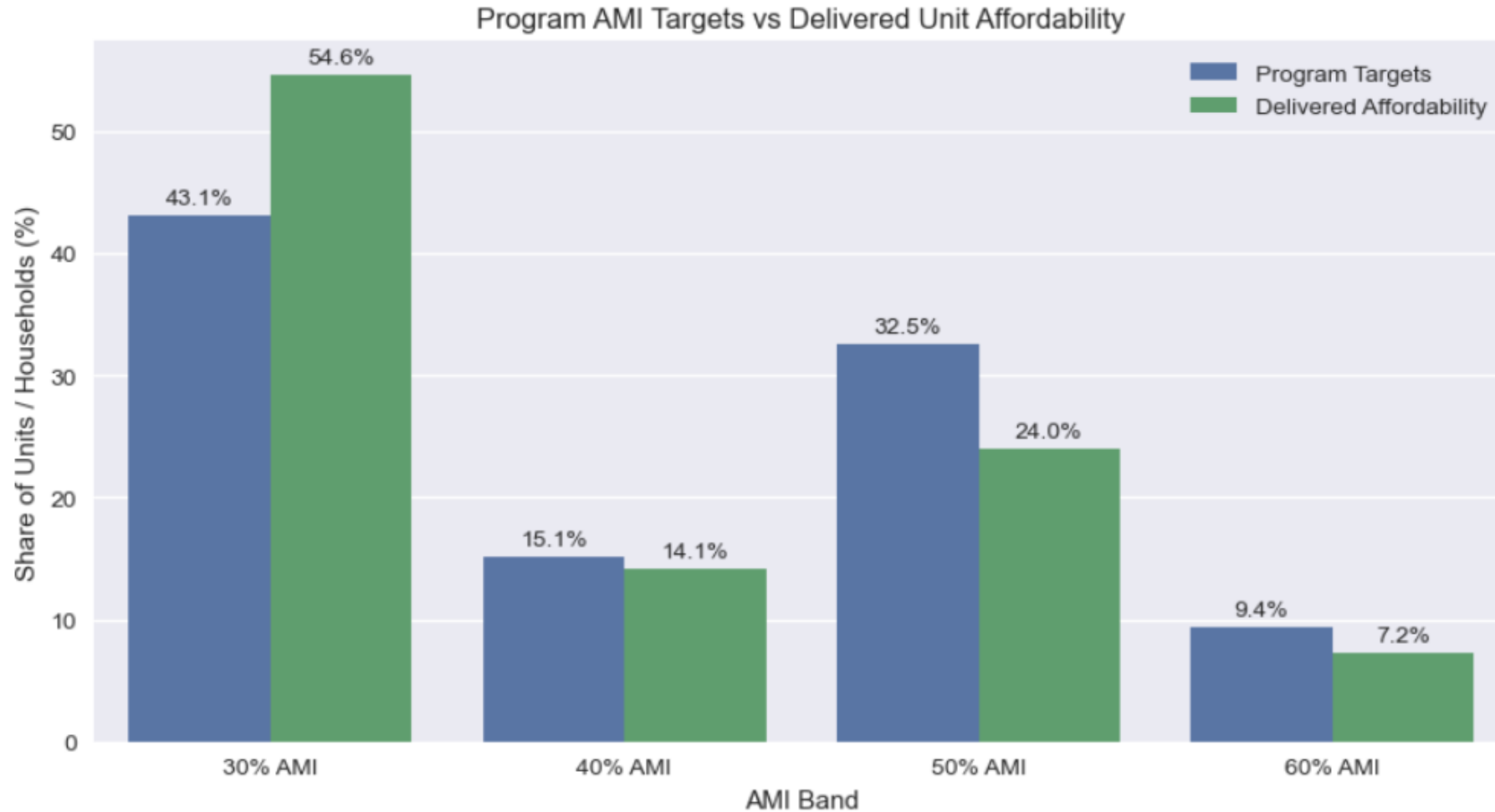
Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# AMI Composition in Metro Pool (% of total units)



Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Program AMI Targets vs. Actual Unit-Level Income Restrictions

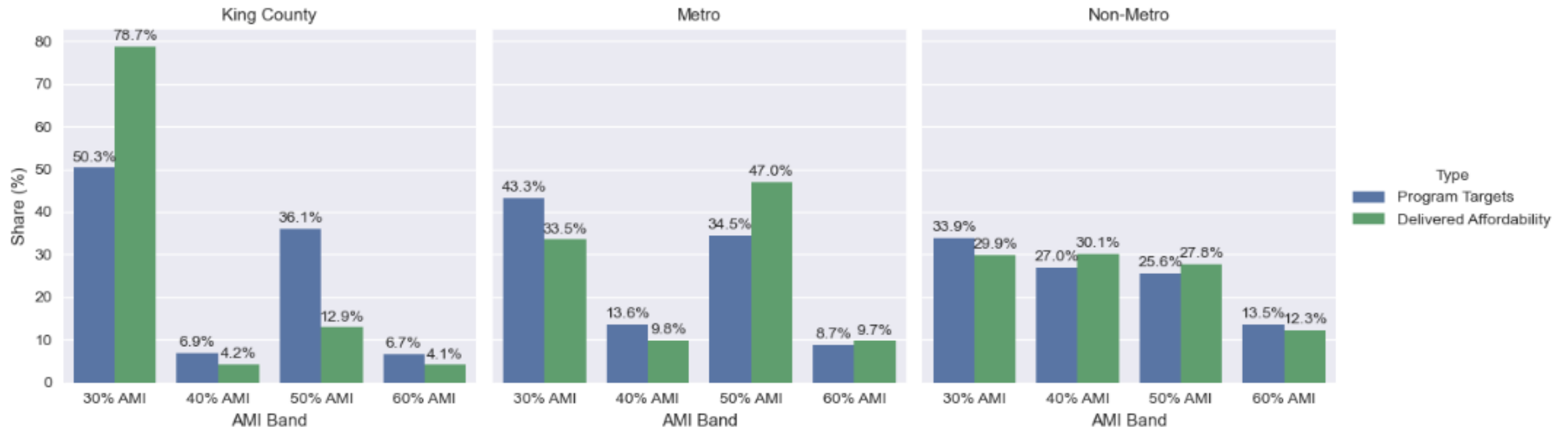


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# Program AMI Targets vs. Actual Unit-Level Income Restrictions



Program AMI Targets vs Delivered Affordability by Credit Pool



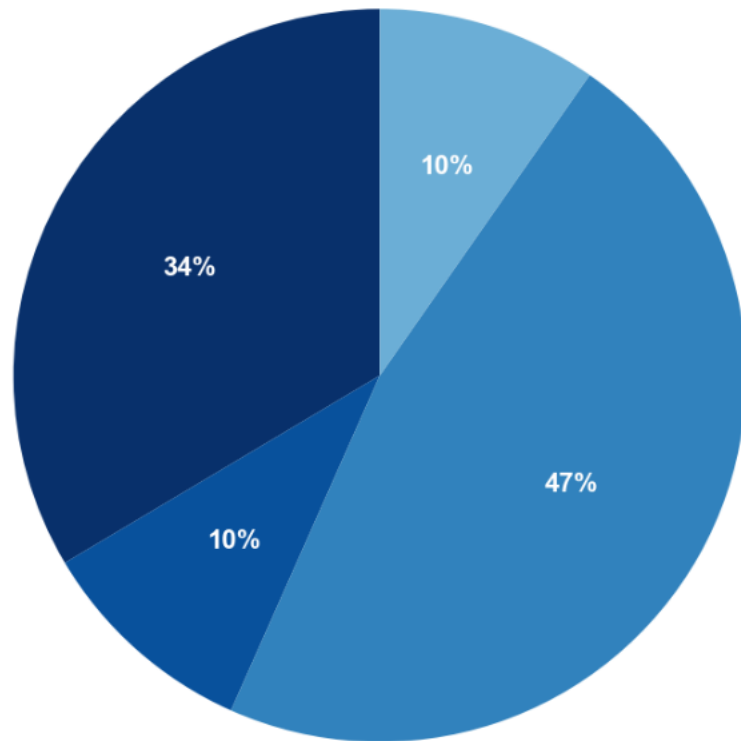
Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Unit Restricted % vs. Actual Household Income

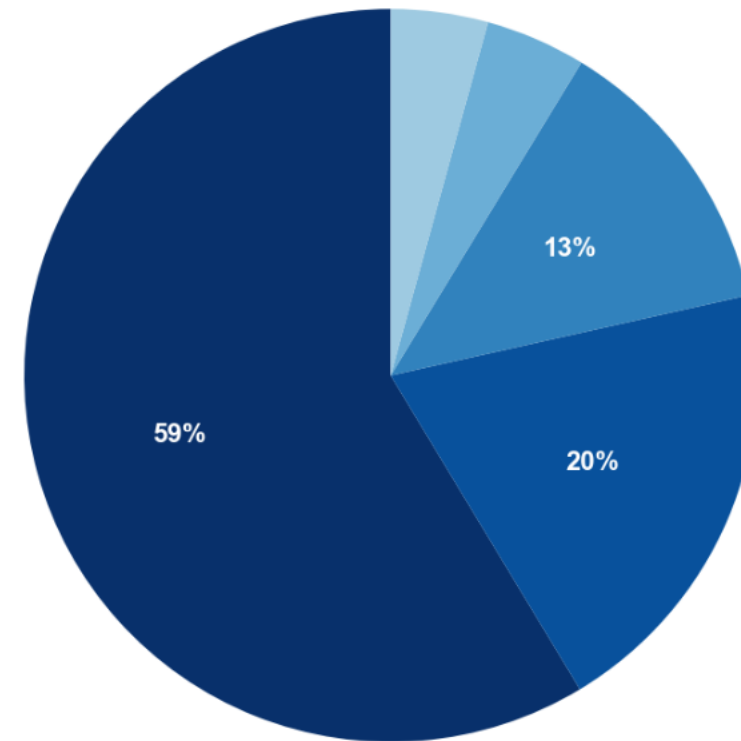


Occupied units, report years 2020-2025

Unit Income Restrictions (Metro)



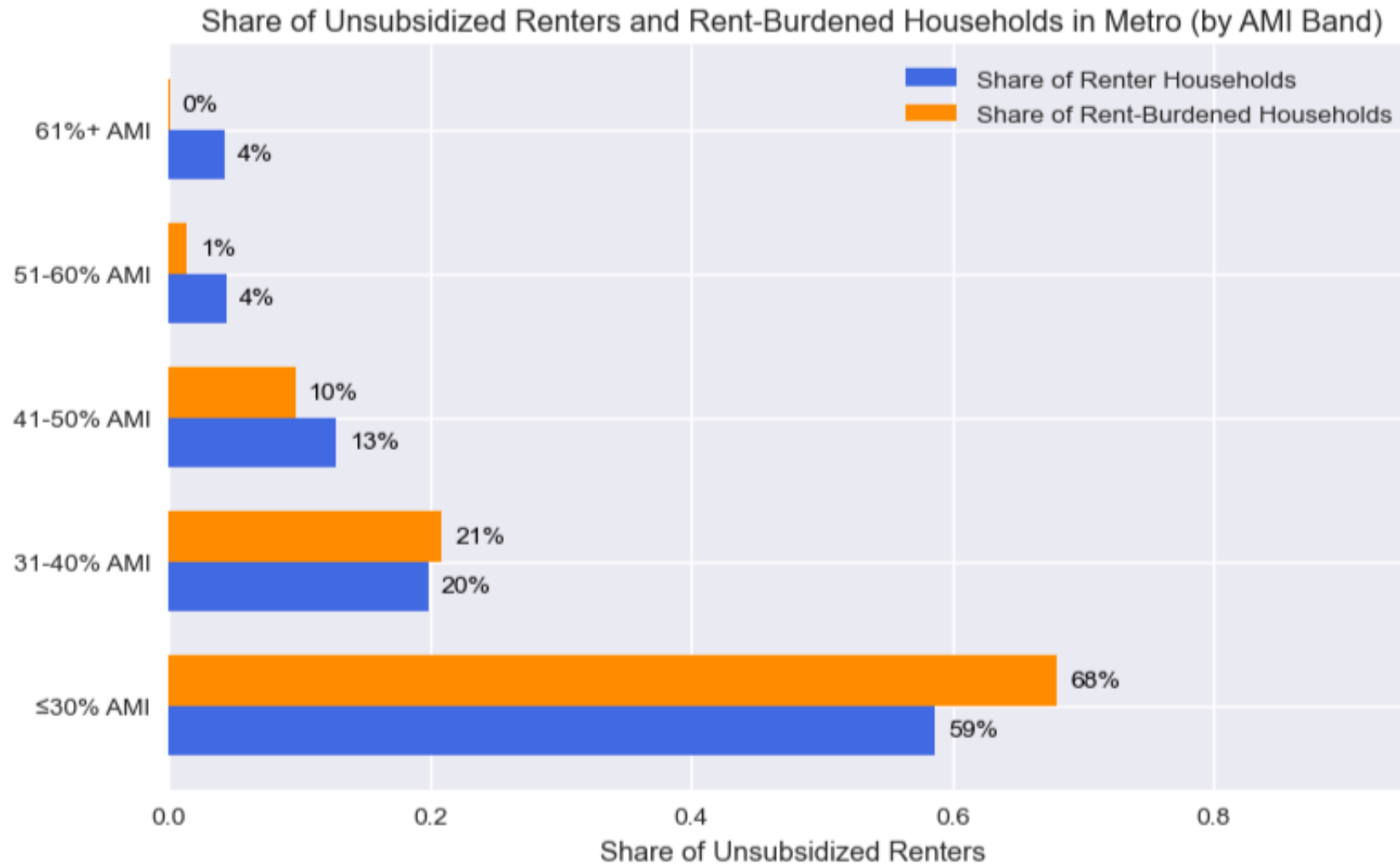
Household Incomes (Occupied Units) (Metro)



*Left: share of units by restricted AMI band. Right: share of households by actual income.*

Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Share of Households vs Share of Rent-Burden (Metro Pool)



Source: Dept. of Commerce WBARS, Table 1. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Current Additional Low Income Set Aside



Additional Low-Income Set-Aside Menu

Option	30% AMI	40% AMI	50% AMI	60% AMI	Higher Income County Points	Lower Income County Points	Weighted Average Income Served
1	50@30	25@40		25@60	60	-	40%
2	50@30	-	50@50	-	60	-	40%
3	50@30	-	30@50	20@60	58	-	42%
4	25@30	50@40		25@60	56	60	42.5%
5	50@30	25@50		25@60	56	-	42.5%
6	10@30	50@40	40@50	-	-	60	43%
7	50@30	10@40	-	40@60	54	60	43%
8	10@30	40@40	50@50	-	-	58	44%
9	-	50@40	50@50	-	56	58	45%
10	10@30	60@40	-	30@60	-	58	45%
11	10@30	30@40	60@50		54	58	45%
12		50@40	40@50	10@60	-	56	46%
13		40@40	60@50		-	56	46%
14	-	40@40	50@50	10@60	54	56	47%
15	-	25@40	75@50	-	54	56	47.5%
16	-	50@40	20@50	30@60	-	56	48%
17	-	40@40	30@50	30@60	54	56	49%

# Potential Idea #1: The Basics



## What Changes

- Reduces matrix to 8 options
- Removes high/low income county component

## What Stays the Same

- Includes 5 “most select options” from 2018-2024 projects
- Keeps flexibility of 25% and 10% level commitment options for where it might matter (e.g., Metro, Farmworker, or Large Households)

## Intended Outcomes

- Maintains 50% @ 30% AMI commitments as highest priority
- Simplifies while still enabling different affordability structures
- Keeps large enough point spread to hit pool minimums
- Mitigate rent burden

# Potential Idea # 1



Additional Low-Income Set-Aside Menu						
	Option	30% AMI	40% AMI	50% AMI	60% AMI	Points
Deep Affordability	1	50@30	-	50@50	-	60
	2	50@30	25@40	-	25@60	60
	3	50@30	10@40	-	40@60	60
Strong Affordability	4	40@30	-	60@50	-	58
	5	40@30	20@40	-	40@60	58
Moderate Affordability	6	25@30	50@40	-	25@60	54
	7	25@30	25@40	50@50	-	52
Targeted Affordability	8	10@30	50@40	40@50	-	50

\*Points are for deliberative purposes only.

# Potential Idea #2: The Basics



## **What Changes**

- Points are awarded based on the percentage of total units restricted at each AMI level
- Applicant may propose any combination of set aside combinations to “build to 100%”
- Removes high/low income county component
- Max points possible changes from 60 to 54 points
- Would likely require updates to minimum point thresholds

## **What Stays the Same**

- Keeps flexibility of smaller commitment options for where it might matter (e.g., Metro, Farmworker, or Large Households)

## **Intended Outcomes**

- Maintains 30% AMI commitments as highest priority
- Enables variety of affordability structures
- Mitigates rent burden

# Potential Idea # 2



AMI Selections	Points
<b>≤30% AMI</b>	
• 50% or more units	35
• 40%-49% units	30
• 30%-39% units	24
• 20%-29% units	17
• 10%-29% units	10
<b>≤40% AMI</b>	
• 30% or more units	15
• 20%-29% units	10
• 10%-19% units	6
<b>≤50% AMI</b>	
• 40% or more units	10
• 30%-39% units	7
• 20%-29% units	4
<b>60% AMI</b>	
Can contribute to project feasibility but not worth points	0
<b>Maximum Points Possible</b>	<b>54</b>

\*Points are for deliberative purposes only.

\*Note: No double counting across income bands

# Alternative Affordability Ideas: Discussion



- Do you think either of these options are an improvement from our current policy?
- Do either of these options address the issues/barriers you face in serving the housing needs in your area?
- Is there something else that's coming to mind for you that we should explore?

# Topic: Average Income Test



- Would you use the Average Income Test (AIT) to support deeper affordability if we incentivized it?
- Do you see AIT as a viable option in your community? Why or why not?

# Policy Focus Area: Priority Population



## **Updated Data**

- Additional data analysis by geographic pool

## **Revisit Current Policy**

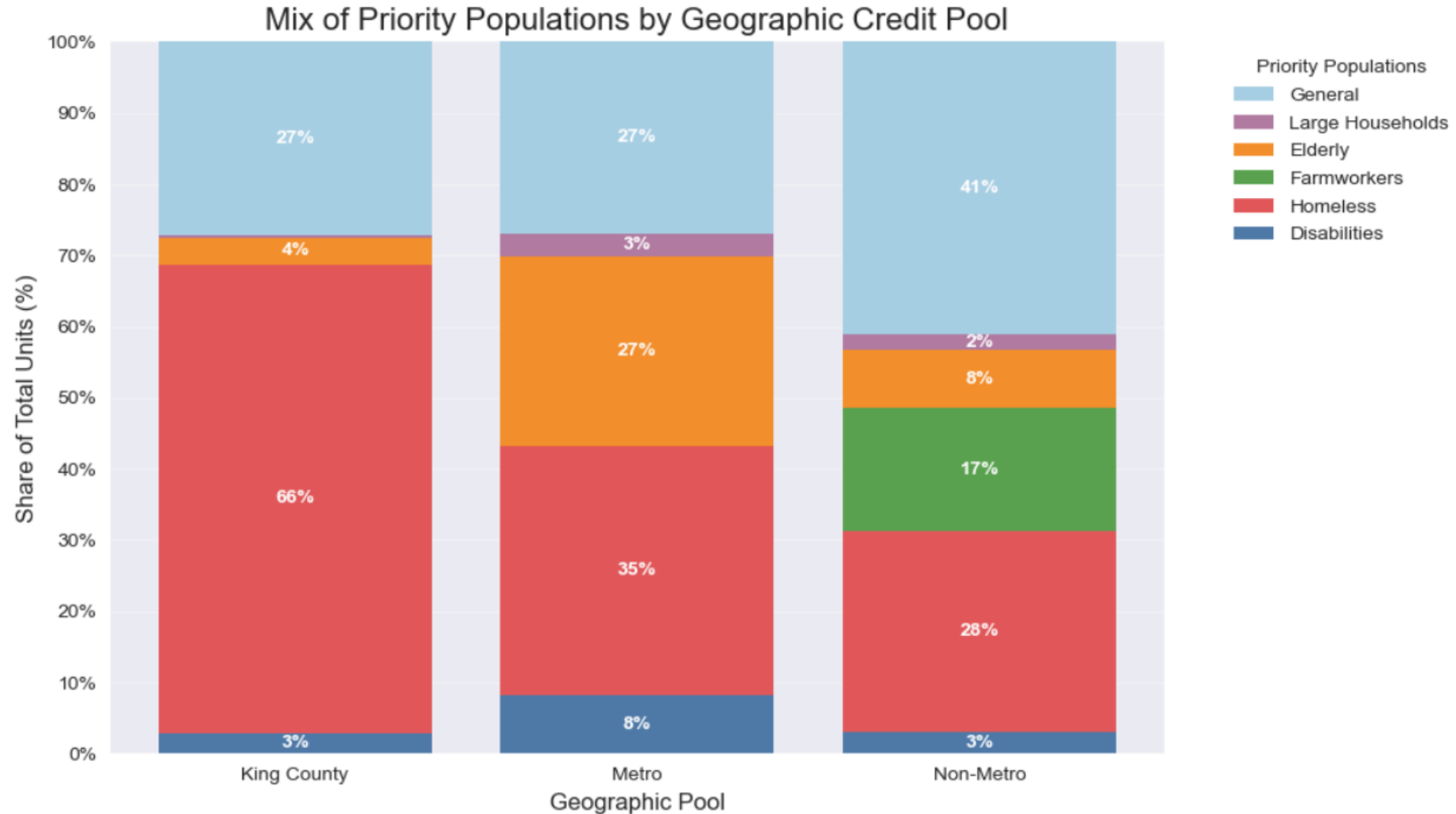
## **Introduce Two Potential Ideas for Consideration**

- General concept
- Differences/similarities from current policy
- Intended impacts

## **Discuss**

- Are either of these options an improvement from current policy?
- Do either of these options address the issues/barriers you face meeting the need in your area?

# Priority Populations Vary By Credit Pool

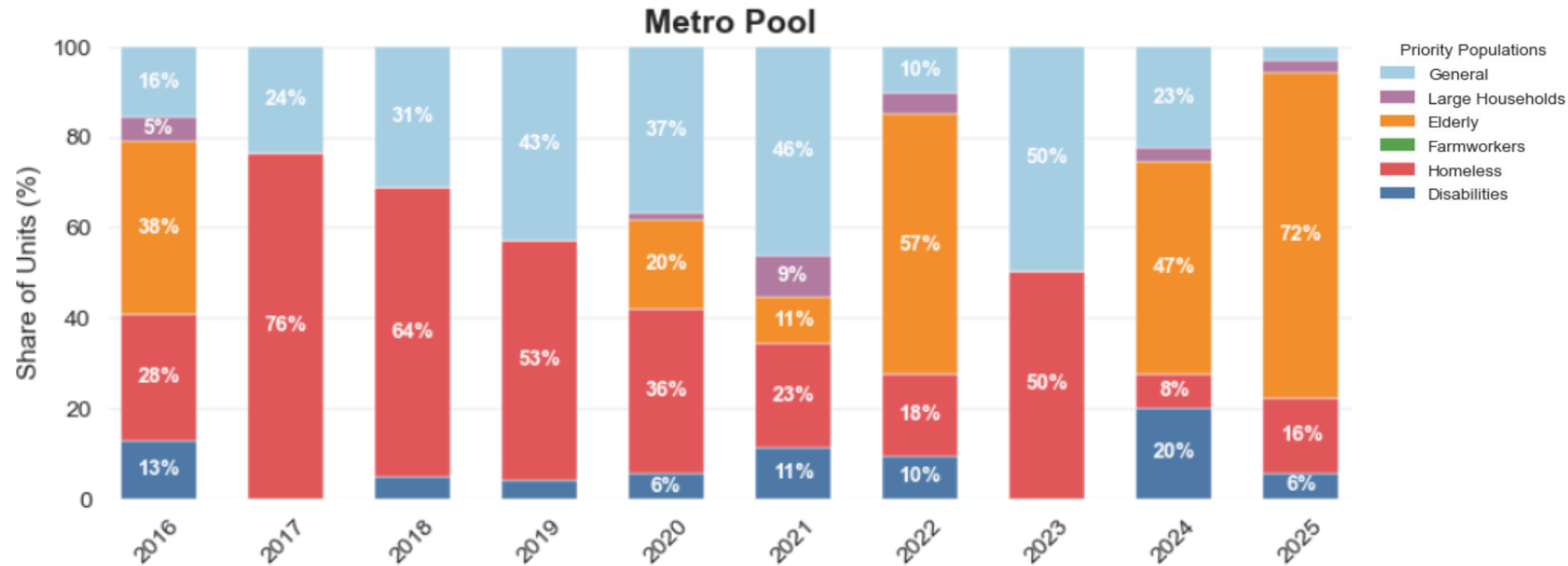


Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Metro Priority Populations Over Time



- **Homeless** population share fluctuates widely and drops in some years (range is 7%-76%) and is trending downward
- Some years have high **Elderly** or **Disabled** unit shares



Source: WSHFC internal operational database. Includes data from projects that received a 9% credit allocation in 2016-2025.

# Priority Populations: Current Policy



## Option A – Permanent Supportive Housing

- Seattle/King County: 75% of units for 35 points
- Metro & Non-Metro: 25% of units for 25 points

## Option B – Farmworker Housing

- Metro and Non-Metro: 75% of units for 25 points

## Option C – Other Priority Populations

- 10 points each (max 20 points)
- Select up to two populations at 20% each
  - Farmworkers
  - Large Households
  - Persons with disabilities
  - Homeless
  - Elderly (entire project)

# Potential Idea #1: The Basics



## **What Changes**

- Points are awarded based on the percentage of total units committed to respective priority population
- Applicant may propose certain combinations to serve mixture of priority population groups
- Options available across pools for same point values
- Max points likely to change but that is still TBD

## **What Stays the Same**

- Continued emphasis on PSH

## **Intended Outcomes**

- Maintains PSH commitments as highest priority
- Elevates Large Households as high priority
- Unbundles categories to make it easier to understand priorities across groups

# Potential Idea #1



Priority Populations	Points
<b>Permanent Supportive Housing(/Homeless)</b>	
• 20-39% units	20
• 40-59% units	32
• 60%+ units	45
<b>Farmworker</b>	
• 20-39% units	15
• 40-59% units	22
• 60%+ units	28
<b>Large Households</b>	
• 20-39% units	15
• 40-59% units	22
• 60%+ units	28
<b>Persons with Disabilities</b>	
• 20-25% units	15
• TBD??	24
<b>Elderly</b>	
• 100% units	24

\*Points are for deliberative purposes only.

# Potential Idea #2: The Basics



## **What Changes**

- Large Households becomes a standalone option that varies by geographic pool
- Current Option C. becomes Option D (language edit)

## **What Stays the Same**

- Everything else

## **Intended Outcomes**

- Maintains PSH commitments as highest priority
- Elevates Large Households as high priority

# Potential Idea #2



## Option A – Permanent Supportive Housing

- Seattle/King County: 75% of units for 35 points
- Metro & Non-Metro: 25% of units for 25 points

## Option B – Farmworker Housing

- Metro and Non-Metro: 75% of units for 25 points

## Option C – Large Households

- Seattle/King County: 50% of units for 30 points
- Metro & Non-Metro: 25% of units for 22 points

## Option D – Other Priority Populations

- 10 points each (max 20 points)
- Select up to two populations at 20% each
  - Farmworkers
  - Large Households
  - Persons with disabilities
  - Homeless
  - Elderly (entire project)

\*Points are for deliberative purposes only.

# Alternative Priority Populations Ideas: Discussion



- Do you think either of these options is an improvement from our current policy?
- Do either of these options address the issues/barriers you face in serving the housing needs in your area?
- Persons with Disabilities Set-Aside: Is there another unit set-aside percentage that we should incentivize besides 20-25%?

# Other Topic Areas



- Job Centers
- Transit Oriented Development
- Energy Incentives
- Additional Use Period



# Topic Area: Job Centers



- Update eligible cities and Census Designated Places (CDPs) using more current data from 2019 to 2023 period
- Resurface methodology incorporating minimum job thresholds (e.g., 2,000 jobs)
- Point Structure: unchanged
- Effective date would be as soon as policies are adopted, but waiver process is under consideration for first year

# Topic Area: Transit Oriented Development



- Use fixed-distance buffers consistent with Department of Commerce's TOD framework:
  - ¼ mile from existing or planned Bus Rapid Transit (BRT)
  - ½ mile from existing or planned Light Rail Transit (LRT)
- Eligibility determined using Commerce's publicly available TOD tool.
  - Applicants must provide documentation (e.g., screenshot) demonstrating eligibility.
  - <https://www.commerce.wa.gov/growth-management/housing-planning/transit-oriented-development/>
- Expand eligibility beyond Seattle/King to all geographic pools
- Still worth 1 point



## Aligning with Commerce's **Clean Building Performance Standards (CBPS)**

- Provide guidance and resources
  - <https://www.commerce.wa.gov/cbps/tier-2-compliance/>
- CBPS requires:
  - Benchmarking
  - Operations & Maintenance Program
  - Energy Management Plan
- Point structure: To be developed (potential optional points for aligning with CBPS)

# Topic Area: Additional Use Period



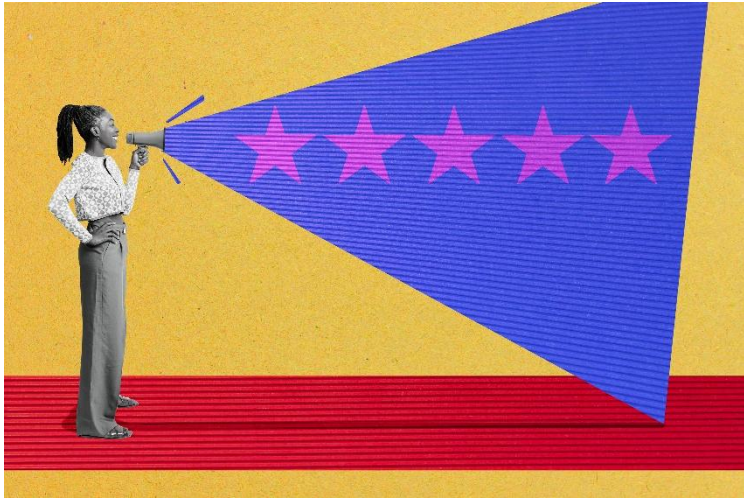
- Establish threshold
- Consider offering points for additional years beyond that threshold



# We Need Your Help



- Call for volunteers for additional testing



- Any projects in your pipeline to test?
- Score AMI and Priority Population Options
- Interested in your selections under these options, impact on points, any challenges with other public funder requirements, etc.

# Timing/Next Steps



## **Original Goal:**



- *Drafting policy language in May*
- *Planned to present to the Board in June*
- *Planned to seek Board approval in July if not June*

## **Next Steps (May-June):**

- Additional testing with volunteer projects in your pipelines
- Sharing back results before finalizing policy language



# Questions?



- Clear understanding?





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# Thank you!

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