# TABLE OF CONTENTS

**ACKNOWLEDGEMENTS & PROJECT BACKGROUND**  
7

**EXECUTIVE SUMMARY**  
8

**CHAPTER 1: THE PROBLEM OF UNHEALTHY HOUSING**  
1.1 Introduction & Project Goals  
1.2 What is Unhealthy Housing?  
1.3 Why is unhealthy housing a problem?  
1.4 Unhealthy Housing: A Problem of Race and Equity  
1.5 The High Cost of Unhealthy Housing & the Importance of Affordable Healthy Housing  
10

**CHAPTER 2: DEFINING THE PROBLEM OF UNHEALTHY HOUSING IN SOUTH KING COUNTY**  
2.1 Characteristics of SKC & the Prevalence of Unhealthy Housing  
2.2 Theoretical Causal Models for Owner and Rental Markets  
23

**CHAPTER 3: EXISTING POLICIES & PROGRAMS IN SOUTH KING COUNTY**  
3.1 Existing Programs & Policies Impacting Housing & Health in SKC  
3.2 Evaluating How Status Quo Policies Fail to Work Together Toward Healthy Housing Goals  
37

**CHAPTER 4: EVALUATING POLICIES AND SOLUTIONS**  
40

**CHAPTER 5: RECOMMENDED BEST PRACTICES TO ADDRESS UNHEALTHY HOUSING IN SOUTH KING COUNTY**  
5.1 Increasing Access to Information for Renters and Homeowners  
5.2 Multi-Family Property Owner Incentives and Regulations  
5.3 Tenant Support Policies  
5.4 Additional Local Capacity  
5.5 Synergy of Solutions  
43

**CHAPTER 6: IMPLEMENTATION SUGGESTIONS — A REGIONAL HOUSING PARTNERSHIP**  
6.1 Local Policies: Ensuring a Strong Foundation  
6.2 A Regional Housing Partnership  
6.3 Collaboration and Referrals  
77

**CHAPTER 7: CONCLUSION AND SUGGESTIONS FOR FUTURE RESEARCH**  
7.1 For Future Research  
83

**APPENDIX A: ADDITIONAL STRATEGIES FOR ADDRESSING UNHEALTHY HOUSING**  
85

**APPENDIX B: FUNDING HEALTHY HOUSING INTERVENTIONS**  
B.1 Social Impact Bonds  
B.2 Billing Healthy Housing Services through Medicaid  
B.3 Hospital Community Benefits For Healthy Housing Interventions  
B.4 Federal and State Grants  
96

**APPENDIX C: POLITICAL FEASIBILITY**  
103

**APPENDIX D: EXISTING POLICY DETAIL—WASHINGTON STATE LANDLORD TENANT ACT**  
105

**APPENDIX E: RESEARCH ON THE EFFECTS OF UNHEALTHY HOUSING CONDITIONS ON HOME VALUE**  
107

**APPENDIX F: POLICY MATRIX**  
109
ACKNOWLEDGEMENTS & PROJECT BACKGROUND

We would like to thank Kelly Rider, Policy Director at the Housing Development Consortium of Seattle King-County (HDC) for granting us the opportunity to explore the important issue of unhealthy housing in South King County. Her support, guidance, feedback, and willingness to connect us with important stakeholders were crucial in helping us to develop a complete and effective report.

We would also like to thank our faculty adviser, Professor Crystal Hall, who provided feedback and support throughout this six-month process.

Finally, thank you to all the individuals in and outside of South King County who were willing to sit down with us and share their unique perspectives on the issue of unhealthy housing.

This report, “Improving Health and Housing in South King County,” was completed in partial fulfillment of the Masters in Public Administration degree at the Daniel J. Evans School of Public Affairs. The project was undertaken as part of the Evans School’s Public Service Clinic program and completed in consultation with the authors’ client, HDC.
EXECUTIVE SUMMARY

Unhealthy Housing in South King County
Unhealthy housing conditions negatively impact neighborhoods, cities, and families who both rent and own their housing. Unhealthy housing conditions manifest themselves in several forms, including the presence of mold brought on by water leaks and uncontrolled moisture infiltration, lead-based paint in the home, insufficient plumbing, lack of heat and ventilation, structural damage, water leakage and more. These conditions, such as mold and pest infestation, can contribute to the prevalence of disease-inducing conditions. Unhealthy housing conditions disproportionately impact low-income families, people of color, and older adults. If unabated, living in these conditions places families at risk of large medical expenditures, higher home maintenance costs, and lost property values. Considering that many individuals suffering from unhealthy housing already have lower incomes, these costs can be crippling.

For these reasons, unhealthy housing conditions concern many of the cities in South King County (SKC), including Tukwila, Renton, SeaTac, Federal Way, Kent and Auburn. While local and statewide policies and programs attempt to maintain housing quality and address unhealthy housing conditions, they fall short in addressing the full range of needs and the complexity of this ongoing problem in SKC. The need for additional strategies to address unhealthy housing in SKC provides the impetus for this report, which seeks to answer the following research question: Which policies and programs can best improve health and housing quality in South King County?

Methodology & Solution Analysis
To determine the policies best suited to address health and housing quality issues in SKC, we conducted exploratory interviews with officials from SKC cities as well as other stakeholders in the local housing community. These interviews informed an understanding of existing programs and their effectiveness. These discussions also helped shape the development of two causal models: one for the rental housing market and one for homeowners. These models help to explain the causes of unhealthy housing specific to SKC.

To develop unique and effective solutions, we conducted a national literature review to determine the best practices used to address unhealthy housing. These solutions were measured against five

Nationally, households with incomes less than $25,000 are almost five times more likely to live in inadequate housing than those earning more than $75,000.

– American Housing Survey
goals to determine which would be recommended as part of a final set of recommended best practices. The goals are:

- the **improvement of health**
- the **improvement of housing quality**
- the **improvement of equity** (including displacement as well as impact on vulnerable populations, people of color, and affordability)
- the **financial feasibility** of the option
- the **implementation requirements** of the option

**Recommended Set of Best Practices**

Based on their performance against these five goals, this report recommends a set of best practices that can be implemented on the local and regional level to improve housing and health in SKC and that also work in harmony with each other. The locally implemented solutions lay the foundation for the regional solutions to succeed, and include:

- **Updated Building Codes that Adopt the National Healthy Housing Standard (NHHS):** Updating local building codes to reflect healthy housing goals will have a direct impact on code enforcement and housing quality.
- **Proactive Rental Inspection Programs:** Assessing the condition of rental units and actively enforcing building codes will have a positive effect on housing quality in the rental market.
- **Just Cause Eviction Ordinances (JCEOs):** Enacting a new ordinance will decrease under-reporting of poor rental housing conditions and provide displacement protections to tenants who may face eviction as retaliation for reporting unhealthy conditions.

This report recommends that these solutions be implemented locally to raise standards for property owners (rental and homeowners alike) and to assist with identifying a range of housing problems in the local community.

This report also recommends implementing the following set of best practices through a **regional housing partnership**, a new entity through which cities can fund and effectively operate the following new programs:

- **Community Health Workers (CHWs):** Community health workers can educate residents about health outcomes associated with substandard housing conditions and connect them to the appropriate programs and resources necessary to improve their homes.
- **Code Compliance Loans for Multi-Family Repairs:** Cities can offer property owners low-interest loans to make the repairs necessary to bring units up to code.
- **Regional Acquisition Fund:** By pooling resources, information, and funds, SKC cities can work with non-profit housing developers to purchase and rehabilitate multifamily and single-family properties, based on local priorities. These acquisitions would ensure healthy, livable units remain permanently affordable across the entire region.

By tackling the issue of health and housing both locally and regionally, SKC cities can leverage their resources and operate programs with greater efficiency to achieve the common goal of healthy, affordable housing.
‘Synergy’ of Solutions
Furthermore, all six of the recommended best practices work in harmony with each other to secure a greater quantity of healthy units across SKC cities. As code is only as strong as its enforcement, implementing rental inspection programs in tandem with the NHHS effectively holds all residential rental property owners accountable and enforces greater overall compliance to a higher overall standard. A JCEO ensures that tenants whose units have not been inspected recently can report healthy housing problems with protection from retaliatory eviction, and therefore allows city code enforcement officers to require that the landlord make the necessary improvements.

Code compliance loans and the acquisition fund also complement the adoption of more stringent building codes and rental inspection programs. By helping low-margin property owners afford potentially expensive repairs and maintenance, the code compliance loan program makes it more likely that landlords will pursue repairs rather than retreating into absenteeism or pursuing a sale of the property (which might threaten the property’s long term affordability). In the latter case, the regional acquisition fund can provide early financing to nonprofit developers in order to acquire the property for redevelopment or rehabilitation and maintain its long term affordability.

By pursuing these policies simultaneously, cities can also capitalize on the set of existing programs aimed at improving health and housing and encourage stronger linkages between new and existing programs. The solutions to SKC’s unhealthy housing problem must ultimately be deployed together from various sectors; a single program cannot solve this complex problem. A collaborative approach that spans jurisdictions and sectors ultimately holds the greatest power to improve not only homes but also the health and lives of South King County residents.
CHAPTER 1: THE PROBLEM OF UNHEALTHY HOUSING

1.1 Introduction & Project Goals

This research report and policy analysis explores unhealthy housing in South King County (SKC) and examines potential solutions that local cities can implement to minimize the problem. The report was written on behalf of the Housing Development Consortium of Seattle-King County (HDC), which requested this report through the Evans School of Public Affairs Public Service Clinic program.

Substandard housing conditions are a problem for entire regions, cities, neighborhoods, and individuals. Poor housing conditions have their most immediate impact on the families and individuals in the form of poor health outcomes. Unhealthy housing, or housing with certain conditions detrimental to one's health, is a problem requiring urgent public policy action in areas where it is most prevalent.

This report examines the linkages between health and housing in SKC and provides a suite of policy and programmatic recommendations to improve housing quality. SKC has a high concentration of housing that is both of low-grade and poorly maintained. The area is also home to a diverse, low-income population that has grown in recent years as regional housing demand has forced many to pursue lower-cost options. Such structural forces create a difficult and urgent situation for local policymakers.

In the ensuing chapters, we seek to answer the following research question: Which policies and programs can best improve health and housing quality in South King County?

To answer this question, we use a number of additional in-depth research questions to guide our analysis. Our research strategies include a robust review of the literature on national best practices and an investigation of quantitative and qualitative data to help understand the intricacies of South King County's challenges. Much of the qualitative data was uncovered through interviews with five SKC cities. Understanding the problem at the local level allows us to better target our research in order to recommend strategies tailored to local needs.

The following chapters cover the concept and problem of unhealthy housing and provide a framework for assessing policy options. Chapter 1 provides a survey of the literature regarding
unhealthy housing, including a definition of unhealthy housing and a review of how explicit housing conditions, such as mold, can be detrimental to one’s health. In short, *what is unhealthy housing and why is it a problem?* Chapter 2 moves on to analyze housing conditions in SKC, specifically by examining the quantitative and qualitative evidence that unhealthy housing is a problem in SKC. Further, we define our causal models for renter and owner households. These causal models are a way to conceptualize these two categorizations of unhealthy housing in SKC. Chapter 3 evaluates the existing set of policies and programs that impact unhealthy housing in SKC. In other words, *how do current policies address the problem of unhealthy housing in SKC?*

Chapter 4 explains the criteria we use to evaluate strategies that SKC cities could implement. Chapter 5 defines and evaluates a set of six best practices that SKC should implement to address unhealthy housing in their local communities. Finally, Chapter 6 provides an implementation guide for selected best practices. This final set of recommendations includes both locally implemented policies and a set of regional programs that should be implemented and operated through a new regional housing partnership.

**Methodology**

In answering the above questions, we rely on the following methods:

- Reviewing national literature regarding the intersection between housing conditions and health outcomes as well as evaluation of programs and policies that attempt to address unhealthy housing.
- Interviews with local stakeholders, including city and county staff, as well as interested and relevant non-profit organizations.

We researched a wide spectrum of national healthy housing data, costs, existing and potential programs, and funding opportunities. Typically, our sources include healthy housing program evaluations, local government documents and program websites, U.S. federal government websites with healthy housing program information, and healthy housing research previously conducted by other academic institutions.

We interviewed staff members at the SKC cities of Auburn, Federal Way, Kent, Renton, and Tukwila who work in housing, community development, or similar fields. In these interviews, we were chiefly interested in gaining cities’ perspectives on problem identification, particular neighborhoods at higher risk of experiencing unhealthy housing, the extent to which cities utilize existing programs, and the kinds of programmatic or policy-related solutions in which they were most interested. We also interviewed county staff from the King County Housing Repair Program.
and Public Health–Seattle & King County to learn more about the county’s role in ensuring healthy housing. Lastly, other organizations and non-profits we interviewed include: Mercy Housing Northwest, the Tenants Union of Washington State, Shelter Resources, Inc., and Enterprise Community Partners.

1.2 What is Unhealthy Housing?
Unhealthy housing is a well-studied area. As a blanket term, unhealthy housing covers a host of housing-related conditions. Unhealthy housing can include not only poor physical condition of a home but also whether it is located in an area at high-risk for natural disasters such as floods, landslides, or earthquakes. Further, industrial or certain commercial facilities can pose contamination risks to nearby homes and their residents. Housing units could also be considered unhealthy if they lie in neighborhoods with high levels of violent crime.

The National Healthy Housing Standard, established by the National Center for Healthy Housing (NCHH) and the American Public Health Association, provides detailed descriptions of the physical requirements of a healthy and safe home. The NCHH’s standard covers such items as minimum structural requirements, safety and personal security, electrical systems, heating and energy efficiency, moisture, waste, pest management, and chemical agents. For each requirement, a rationale is provided linking the specific housing condition to its impact on a resident’s health.

In order to provide a framework for addressing unhealthy housing conditions specifically in SKC in an effective way, this research paper limits the scope of unhealthy housing to the physical characteristics of a home, similar to the National Healthy Housing Standard. The working definition of unhealthy housing for our paper follows the NCHH’s Seven Principles of a Healthy Home:

- Dry
- Clean
- Pest-Free
- Safe
- Contaminant-Free
- Ventilated
- Maintained

Housing units may also be unhealthy if they lack basic necessities, such as kitchen facilities, plumbing, and heating. For purposes of this paper, unhealthy housing is limited to the physical state

---

1 King County Public Health. "Unsafe Housing Protocol: Warning Signs of Asthma."
of a house and does not include whether the home is located in a dangerous area, either because it is at risk to a natural disaster or because it is near a contaminated site.

1.3 Why is unhealthy housing a problem?

Too many people in SKC, including both renters and homeowners and especially young children and the elderly, live in otherwise preventable unhealthy housing conditions with severe consequences on their health.

Inadequate and substandard housing is a problem that increases an individual’s risks of developing serious and costly health conditions. Researchers and public health experts across the country have documented a robust causal link between housing and health. Poor quality housing is most prominently associated with the following health conditions:3

- Lead poisoning
- Asthma & other chronic diseases
- Respiratory infections & other infectious diseases
- Unintentional injuries, including fire
- Cancer

An array of home conditions are linked with poor health outcomes. The section below expands on the causal links between housing conditions and health.

How Do Home Conditions Impact Health?

**Lead-Based Paint:** Perhaps the most well-known housing condition linked with poor health is the presence of lead. Lead was widely used in paint and home piping prior to 1978 when regulations were passed prohibiting the use of lead-based paint. Ingesting lead “irreversibly affects [the] brain and nervous system, resulting in lower intelligence and reading disabilities.”4 The problem is of greatest concern in pre-1978 homes with chipping and deteriorating paint and can be hazardous when children ingest or inhale lead-contaminated dust.5 Researchers estimate that “70 percent of lead poisoning cases can be attributed to lead-based paint hazards in the home.”6

---

5 Ibid
**Mold and Asthma:** Mold primarily spreads in damp environments. Damp conditions are most prevalent in kitchens and bathrooms but can plague the entire home if internal or external structural inadequacies enable moisture to enter the home. For instance, holes and missing roof materials offer entry points for moisture as can any number of other conditions including missing, broken or improperly installed windows,7 cracks in walls, etc. Piping and plumbing malfunctions can also allow moisture to invade the home. Signs of water damage include sagging roofs and sloping or buckling walls. Similarly, poor or ineffective ventilation can fail to eradicate moisture, enabling damp conditions to persist. Living in damp and moldy conditions can exacerbate respiratory conditions like asthma, especially in children.

The association between mold and asthma and other chronic respiratory conditions is robust. Researchers find a significant relationship between mold and health conditions even after potentially “confounding factors such as income, social class, smoking, crowding and unemployment are controlled for.”8 Indeed, those estimating the total number of asthma cases caused by indoor environmental conditions like mold find that 21% to approximately 40% of asthma cases are attributable to conditions within the home.9,10,11

**Non-Mold Allergens and Respiratory Conditions:** Cockroaches are one of the leading and most severe causes and irritants of asthma. Particles from decomposing cockroaches and their feces enter the air breathed by a home’s residents. When inhaled, these particles severely irritate the lungs sometimes causing asthma and in other cases severely exacerbating it.12 Water and poorly stored food attract cockroaches.13 Therefore, damp conditions and improper food storage increase the risk of cockroach infestation. Dirty carpets, being hotbeds for dust mites, also irritate those with asthma and other respiratory conditions. Clean living conditions with properly functioning ventilation systems help mitigate these problems.

---

7 Interview with City of Tukwila officials.
8 Ibid.
Radon and Carcinogenic Air Pollutants: Housing can be a source of exposure to carcinogenic air pollutants.\textsuperscript{14} For instance, radon, a naturally occurring gas released from the ground, has been associated with lung cancer. HUD reports that 6.8 million homes in 2009 had radon exposures above the current EPA action level.\textsuperscript{15} Asbestos are also linked with cancer. Furthermore, residential exposure to smoke and other pollutants from heating and cooking with gas are also linked with respiratory illness.\textsuperscript{16}

Unintentional Injury: Structural defects, indoor air quality, toxic chemicals, and other hazards can all lead to unintentional injury, especially among children, elderly, and disabled populations.\textsuperscript{17} Unhealthy housing and poor design can leave older adults susceptible to falls.\textsuperscript{18} Injuries at home account for an estimated 4 million emergency room visits and 70,000 hospital admissions each year.\textsuperscript{19}

Cold Home Conditions: Poor insulation and heating systems and exposure of the indoor habitat to the outdoors can create uncomfortably cold home conditions. Exposure to very low indoor conditions is associated with an increased risk of cardiovascular disease, and all around poor health.\textsuperscript{20}

Coexistence of Unhealthy Conditions
The Robert Wood Johnson Foundation's Commission to Build a Healthier America notes that many of the above conditions often coexist in the same homes.\textsuperscript{21} For instance, just one home often plays host to hazardous lead paint and poor indoor air quality while lacking home safety devices like fire alarms or handrails on steep staircases. Coexisting problems place families at greater risk of multiple health problems. As will be seen below, certain groups are disproportionately likely to be

\textsuperscript{18} Ibid.
at risk to these problems. And, most concerning, these same families are often the least able to afford the high costs of both living in unhealthy housing and mitigating its effects.

1.4 Unhealthy Housing: A Problem of Race and Equity
Researchers and federal agencies have found that lower-income and minority populations are more likely to lack access to healthy housing conditions. The Surgeon General of the United States, in the document titled “The Surgeon General’s Call to Action to Promote Healthy Homes,” notes that the often discussed health disparities along racial lines may be linked to poor access to safe and healthy homes.22

Low Income Individuals
When it comes to living in substandard housing conditions, there is a significant disparity between those earning low and very low incomes and individuals earning a more livable wage. Nationwide, households earning an annual salary of less than $24,999 per year were almost five times more likely to live in inadequate housing (not necessarily equal to unhealthy housing, as discussed below) than those earning greater than $75,000 (8.5% versus 2.4%, respectively).23 The U.S. Centers for Disease Control also report “those without a high school diploma were more than twice as likely as those with some college education to live in inadequate housing.”24

However, the income-disparity for residents living in unhealthy housing, by CDC’s definition, is somewhat less extreme. The distinction is subtle; many homes may have elements of poor health, such as rodents and pest infestations and even water leaks, without having major housing quality standard issues (present in inadequate housing). The CDC notes that:

“A householder earning [less than $25,000 per year] was approximately 4 times more likely to live in an inadequate housing unit as a householder making [more than $75,000] a year, but was only 1.3 times more likely to live in an unhealthy, as opposed to an inadequate, home. The decrease likely can be attributed to more common characteristics associated with unhealthy homes (e.g., presence of rodents and interior water leaks), compared with inadequate homes. For example, in 2009, approximately 36.9% of surveyed respondents in housing units indicated observing rodents recently, and 10% reported having had a water leak during the previous 12 months.”25

24 Ibid.
25 Ibid.
People of Color
There is also a pronounced racial disparity in the likelihood of living in poor housing conditions.26 The CDC reports that African Americans, Asians/Pacific Islanders and American Indians/Alaskan Natives are all more likely to live in inadequate housing nationwide compared to non-Hispanic whites.27 This finding is substantiated by interviews with staff members across the cities of South King County, all of whom mentioned anecdotal evidence that immigrant, refugee and non-English speaking communities are overrepresented in their stock of substandard living conditions.

Vulnerable Populations Susceptible to the Problem: The Young, Old and Pregnant
Young children and pregnant women are especially vulnerable to unhealthy housing. Mold, lead, pesticides, and tobacco smoke can have detrimental effects for pregnant women and their unborn children. Young children are also especially susceptible to environmental toxins. For instance, “Due to their developing organs and nervous system ... the normal hand-to-mouth and exploratory behavior of young children and babies makes them more vulnerable to environmental hazards, especially to contaminants in dust. Since they may spend 80-90 percent of their time indoors, the importance of minimizing possible dangers is clear.”28

The elderly are also more vulnerable due to the fact that aging bodies grow more susceptible to environmental hazards such as carbon monoxide, tobacco smoke, and temperature extremes.29 The elderly are also substantially more at risk for accidental injuries brought on by poor or unsafe housing design like improperly attached or missing handrails, steep staircases, etc.30

Renters
Low-income renters have a higher incidence of housing quality problems compared to other renters or homeowners.31 In 2005, for instance, 14% of low-income renters across the nation lived in homes with severe or moderate physical problems (like water growth that causes mold growth which triggers allergic reactions and asthma attacks), versus 6% of all U.S. residents.32 As Chapter 3

29 Ibid.
30 Ibid.
32 Ibid
discusses, renters are also most likely to suffer from unhealthy housing in South King County compared to homeowners.

1.5 The High Cost of Unhealthy Housing & the Importance of Affordable Healthy Housing

As detailed above, the families with the least means are also the most likely to live in substandard and unhealthy housing. Unfortunately, living in poor conditions can impose steep financial costs on already cost-burdened families as well as their surrounding community. As a result, the families most likely to live in unhealthy conditions are the most unable and unlikely to improve these conditions, giving them little chance of escaping unhealthy housing conditions. Unhealthy housing results in three costs discussed below: increased medical expenditures, higher maintenance and utility costs, and a cost to families (and local cities) through the lost value of their home.

1) Increased Medical Expenditures

Problems with the home environment can impose serious direct and indirect medical costs on families and individuals. Those suffering from asthma, for example, face increased costs related to healthcare including emergency visits, hospital stays, physician visits, ambulance use, drugs and devices, and blood and diagnostics tests. Children with asthma suffer by missing school, while parents of asthmatic children – or adults that also suffer from asthma – lose precious work time and productivity due to travel and wait time related to medical appointments.

An old but well cited study found that costs related to asthma ranged from $140 - $2,584 per year – a figure inclusive of direct healthcare costs and indirect costs associated with productivity losses. These costs impose billions of dollars' worth of societal costs nationally. Similarly, unintentional home injuries, such as falls among the elderly along steep staircases, cost the nation billions annually in similar health-related costs, including emergency hospital visits and ambulance use.

---


2) **Higher Maintenance & Utility Costs**
Homes of poor quality are more expensive in which to live and to maintain. For instance, homes with broken, missing, or low-quality single pane windows require more energy to heat and cool. Higher utility bills result, further limiting family purchasing decisions regarding healthy foods and even home repairs. Maintenance for substandard housing is also more expensive. A sagging roof that needs replaced, for example, will cost great expense, which an already cash-strapped homeowner will struggle to afford. Research conducted by the authors of this report (see Appendix E) found that water leaks due to structural deficiencies and cracked walls significantly increased yearly maintenance expenditures by thousands of dollars or more.38

3) **Lost Value of a Home**
It is well known that blighted properties suppress the values of adjacent homes. While many homes with unhealthy conditions cannot officially be termed “blighted,” they still host conditions that negatively impact the value of the property and potentially the values of neighbors’ homes. Research conducted for this report found that numerous housing conditions linked to poor health outcomes reduce home values. For example, broken windows and sagging roofs, known causes of mold in the home, depress home values by *tens of thousands of dollars*.39

This is troublesome for two key reasons. First, low-income families who occupy and own single-family homes need to build and accumulate assets, particularly since home equity is one possible way to finance needed home repairs. While homeownership has traditionally been viewed as a sound investment, it is difficult for households living in poor quality housing to realize these gains as the value of their home may not appreciate very quickly. While these assets can realistically only be utilized by taking out a loan against the house or selling a home, this can have an impact on the ability to pay for emergencies or to finance large expenditures like college education. Second, these costs are often shared, though to a lesser extent, by neighboring homeowners and other taxpayers. Severely dilapidated homes (perhaps defined as blight) can negatively impact the property values of nearby homes, and increases in medical needs related to unhealthy housing can lead to increases in property taxes to

---

38 The research referenced was completed for a graduate course in advanced multivariate regression methods. Research from our report, titled “Determinants of Home Repairs and Maintenance and the Cost of Non-Repairs: Evidence from the 2013 American Housing Survey,” is included in Appendix E.

39 See above footnote.
fund local emergency service needs. The reduction in local property values can have cascading negative effects on local property tax revenues.
CHAPTER 2: DEFINING THE PROBLEM OF UNHEALTHY HOUSING IN SOUTH KING COUNTY

In order to determine how best to address unhealthy housing conditions, it is important to understand how widespread unhealthy housing is in South King County, relative to other areas. This chapter provides context for the problem of unhealthy housing through an examination of quantitative and qualitative evidence of unhealthy housing in SKC. The section below discusses general characteristics of SKC’s housing market and population. The Chapter concludes by discussing the rental and homeownership causal models developed for this report, which explain some of the causes of the ongoing unhealthy housing problems.

2.1 Characteristics of SKC & the Prevalence of Unhealthy Housing

Although SKC cities share many common characteristics, they are not homogenous and have unique characteristics related to the housing stock and the population that resides there, as discussed in the following sections.

Study Area Demographics

This report examines unhealthy housing in SKC as a region but focuses on six cities in particular: Auburn, Federal Way, Kent, Renton, SeaTac, and Tukwila. These cities range in population from 124,435 in Kent to 19,765 in Tukwila. Typical incomes in SKC are much less than in other areas of the county. The median household income in these cities varies from $43,331 in Tukwila to $64,141 in Renton. King County median income was $71,811 in 2013.

While South King County is typically discussed as having a large amount of market-rate affordable housing, a large number of homeowners and renters still experience housing cost-burdens because they have such low incomes. Households are considered cost-burdened when they pay more than 30% of their income on housing costs. In all six cities listed above, 50% of the households are spending more than 30 percent of their income on housing. In SeaTac, the cost-burden rate is 58%, and in Tukwila, 59.8% of households are paying more than is considered affordable. High housing cost-burdens have significant implications for unhealthy housing since households with high

---

41 Ibid.
42 Ibid.
housings costs have much less discretionary income to spend on home repairs and regular maintenance.

South King County is also home to a very diverse and growing population. Over the last 20 years, people of color have accounted for 100% of population growth while the non-Hispanic white population has actually declined.43

**Condition of Homes in the Seattle Metro Area**

Understanding the general condition of homes in SKC can help cities design the most impactful programs and policies. There is evidence that homes in SKC are, on average, more likely to be in poor condition relative to nearby areas.

**American Housing Survey Data:** The American Housing Survey (AHS) provides the most in-depth survey of housing quality across the nation. While detailed in the type of questions asked, the survey does not provide city-specific housing characteristics. Instead, the AHS provides details on metropolitan statistical areas (MSAs). The Seattle MSA was most recently surveyed in 2009. The survey of the Seattle MSA provides a large sample size that can be broken down into two main geographic areas: central-city (Seattle) and non-central city. The non-central city data encompasses South King County but also includes the areas to the east and to the north of Seattle. For SKC, the AHS provides a useful but limited approximation of area housing conditions.

The AHS dataset defines homes as moderately or severely inadequate, based on a home having at least two major conditions, or missing a key facility such as a kitchen. 9.9% of rental units outside of Seattle are severely or moderately inadequate.44 This is statistically significantly higher than the national average of only 6.7%.45 Meanwhile, only 3.0% of owner units are severely or moderately inadequate. Yet of owner-occupied housing that is severely inadequate, the rate is 1.6% outside of Seattle, which is significantly higher than the national average of 0.9% for non-central city, though lower than Seattle where 3.0% of owner-occupied units are severely inadequate.46

---


44 "Healthy Housing Profiles for Cities and MSAs. Based on the American Housing Survey,” National Center for Healthy Housing. Based on 2009 American Housing Survey data.

45 Ibid.

46 Ibid.
Overall, of homes in the Seattle MSA, 30% of homeowners and 33% of renters noted some interior or exterior problem with their unit.47 9.1% of owner-occupied homes outside the central city have unrepaid roof problems, which is statistically significantly higher than the national average of 5.9%,48 and 6% of rental homes lack adequate kitchen facilities, almost double the national average. It should be noted that the regional housing stock also surprisingly fares better than average on measures such as water supply and water leaks. 49

Data on home condition collected by the King County Assessor provides additional evidence that single-family homes are of poor condition in South King County relative to other areas. The Assessor’s office rates homes on a 1-5 scale (1 being “poor-worn out” and 2 being “fair-badly worn”).50 The ratings are somewhat subjective, however, as inspectors may not actually enter a home in many cases and simply rely on the general external features of the building. Generally, homes in Tukwila are more likely to receive a 1 or 2 condition rating than that of other South King County cities; Tukwila zip codes 98108 and 98168 are ranked 8 and 9 for the most homes ranked 2 in percentage terms of all King County. The total number of homes in Tukwila ranked 1 or 2, however, is still relatively low; 133 and 183 condition 2 homes out of 5604 and 7883 total homes are located in those respective zip codes.51

**Age of Homes**

The age of the housing stock in South King County is not necessarily older than the rest of King County, as the city of Seattle has a large number of homes built before 1939. As shown in Table 1, of the six South County cities studied, Tukwila has the largest portion of housing stock built in 1939 or older at 7.6%. Conversely, a large portion of the housing in Federal Way and Kent was built in 1980 or later.

---

47 Ibid.
48 Ibid.
49 Ibid.
50 Condition rating of 1: “Poor- Worn out. Repair and overhaul needed on painted surfaces, roofing, plumbing, heating and numerous functional inadequacies. Excessive deferred maintenance and abuse, limited value-in-use, approaching abandonment or major reconstruction; reuse or change in occupancy is imminent. Effective age is near the end of the scale regardless of the actual chronological age.” Condition rate of 2: “Fair- Badly worn. Much repair needed. Many items need refinishing or overhauling, deferred maintenance obvious, inadequate building utility and systems all shortening the life expectancy and increasing the effective age.” See “Glossary of terms for residential parcels,” King County Department of Assessments. [http://your.kingcounty.gov/assessor/eRealProperty/ResGlossaryOfTerms.html](http://your.kingcounty.gov/assessor/eRealProperty/ResGlossaryOfTerms.html).
SKC contains multiple pockets of low-quality homes developed quickly during World War II to house Boeing workers. Many homes built during this time period were meant only as temporary housing yet still house low-income residents in cities such as Renton. These types of developments are difficult to redevelop due to the extensive amount of rehabilitation needed.

### Type of Housing Stock

The characteristics of unhealthy housing in SKC cities can also be viewed in relation to the type of housing stock – whether the problem is more prevalent in single-family homes or in larger multifamily buildings and the extent to which each exists in SKC cities. Addressing poor housing conditions in multifamily units will require a different approach than single-family homes.

The six cities in SKC vary in both scale and proportion of multifamily buildings. As Table 2 illustrates, Tukwila has the highest percentage of buildings with 3 or more units at 51.4%. Meanwhile, Auburn has a larger share of single-family homes and mobile homes; only 31.1% of Auburn’s total units are multifamily. Kent has the largest total number of multifamily homes, with 40 percent of units in buildings with 3 or more units. Here, more than 17,000 homes are in multi-family buildings while less than 4,000 multi-family homes exist in Tukwila.

---

52 Per interview with Auburn city officials. March 5, 2015.
While SKC has a large number of multifamily units, generally the size of individual buildings is smaller compared to King County as a whole. While 18% of King County’s housing consists of multifamily buildings with 3-20 units, the percentage is higher in every SKC city examined. In Federal Way and Kent, 29% of all housing is in buildings of this size. These cities, however, have a much lower share of large multifamily buildings consisting of 20 units or more, with percentages as low as 9% in Auburn.54

54 American Communities Survey. 5-Year 2009–2013 estimates.
Owner-Occupied versus Renter-Occupied Housing
As stated above, both nationally and in the greater Seattle area, renter households are more likely to live in substandard conditions. This is in part because renters have less control over their housing conditions as well as rental housing market factors.

In SKC cities, the majority of the housing stock is owner-occupied with the exception of Tukwila, where 60% of units are renter-occupied. Most cities are fairly balanced between renter and owner-occupied units as shown in Table 3.

<table>
<thead>
<tr>
<th>SKC City</th>
<th>Owner-Occupied</th>
<th>Owner-Occupied Percent</th>
<th>Renter-Occupied</th>
<th>Renter-Occupied Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auburn</td>
<td>16,407</td>
<td>59.8%</td>
<td>11,020</td>
<td>40.2%</td>
</tr>
<tr>
<td>Federal Way</td>
<td>18,615</td>
<td>55.1%</td>
<td>15,145</td>
<td>44.9%</td>
</tr>
<tr>
<td>Kent</td>
<td>21,515</td>
<td>53.5%</td>
<td>18,674</td>
<td>46.5%</td>
</tr>
<tr>
<td>Renton</td>
<td>20,148</td>
<td>54.4%</td>
<td>16,907</td>
<td>45.6%</td>
</tr>
<tr>
<td>SeaTac</td>
<td>5,281</td>
<td>52.5%</td>
<td>4,779</td>
<td>47.5%</td>
</tr>
<tr>
<td>Tukwila</td>
<td>2,880</td>
<td>39.6%</td>
<td>4,399</td>
<td>60.4%</td>
</tr>
</tbody>
</table>

Source: American Communities Survey (2009–2013)

Conditions Specific to South King County
In conversations with city staff in SKC, we learned that unhealthy housing is prevalent and generally on cities’ radar. Unhealthy housing is understood to be most prevalent among low-income homeowners and renters. Often, unhealthy conditions are found in large multifamily buildings where mold and deferred maintenance can lead to poor health outcomes for those living there. Additionally, some SKC cities report that residents dwelling in multifamily rental properties under-report unhealthy conditions in their units as they fear eviction or other retaliatory practices from their landlords. This issue is further exacerbated by language differences and a general perception of “trust issues” among immigrant communities.

These conversations reflected a region-wide desire to identify proactive, cost-effective measures that can greatly improve the health of each city’s housing stock.

2.2 Theoretical Causal Models for Owner and Rental Markets
The root causes contributing to the prevalence of unhealthy housing in the rental and homeowner markets vary considerably. To better understand and explain these differences, we developed two causal models that help explain how housing becomes, and continues to be, unhealthy in SKC.

Why Unhealthy Housing Exists in the Rental Market

55 Interviewed city staff in Auburn, Federal Way, Kent, Renton, and Tukwila.
The quality of housing is largely a product of supply and demand. The market produces housing when demand is strong enough to yield rent levels that support developer and investor profit demands. Demand for housing is strong throughout King County, a jobs-rich region currently experiencing a tech-boom expected to add thousands more jobs in coming years. Under the “stress” of this population influx, demand for rental properties is outpacing supply across the urban market. The results of this demand have impacted the SKC rental market, where vacancy rates have dropped and monthly rents risen intensely over the last 9 years.56

Many renters in SKC lack the purchasing power of renters in King County’s other regions. The incomes of prospective renters remain, on average, considerably lower than Seattle, for instance. From a developer’s perspective, these lower incomes cannot support the rents that provide a sufficient return on investment for the development of new units. Rather than (or in addition to) leading to the production of new units, strong demand for low-cost rental housing in SKC is potentially eliminating the financial incentive for property owners to maintain the quality and health of their units.

Expanding on this point, profit-driven owners of rental properties seek to recoup the cost of completing expensive repairs or upgrades to units through higher rents. However, demand in the SKC rental market does not support the property owners’ desired return on investment for expensive repairs. So, unable to recoup the cost of more expensive maintenance and repairs, property owners are without a monetary incentive to maintain the health and quality of their units. This might be especially true of some property owners that deferred maintenance during the Great Recession, allowing minor problems to develop into more major (and more costly) ones. It should be noted that, for a period, vacancies soared, rents dipped and profits declined in the SKC rental

56 CoStar.
housing market (see graphs above). The high proportion of smaller multifamily buildings further compounds the problem; these property owners, more than others, struggle to earn the positive returns required to reinvest in their property.\textsuperscript{57} Lacking strong profit margins, many of these units are undercapitalized, physically inadequate, and potentially unhealthy.\textsuperscript{58}

Faced with poorer quality units but intense competition for units, renters are willing to accept unhealthier and substandard housing conditions at a higher price than they would in a weaker market. This dynamic shifts the balance of bargaining power from the renter to the landlord, who may exercise this power imbalance and exploit the renter’s desperation for living quarters through intimidation, including threat of eviction and deterring renters from lodging complaints about the quality of their units with local code enforcement officials.

In summary, the lack of a proper market signal combined with disempowered tenants who refrain from reporting poor housing quality, means that \textit{multifamily property owners lack the incentive to properly maintain their units}. This gives way to several adverse consequences. First, some SKC residents directly suffer from unhealthy conditions. Second, communities suffer from increased emergency and public safety costs, negative perceptions of SKC housing, and suppressed nearby property values.

\textbf{Figure 1: Causal Model Explaining Unhealthy Housing in the Rental Market}

\begin{center}
\includegraphics[width=\textwidth]{figure1.png}
\end{center}

\textsuperscript{57} Newman, Sandra J. “Low-End Rental Housing: The Forgotten Story in Baltimore’s Housing Boom.” The Urban Institute. \url{http://webarchive.urban.org/publications/311222.html}.

\textsuperscript{58} Ibid
It is likely that a portion of renters living in unhealthy housing are generally unaware of the connection between their living environment and their health and are therefore unable to make informed housing choices.

Why Unhealthy Housing Conditions Exist in the Single-Family Owner Market
While market forces contribute to producing unhealthy housing units in the rental market, their role is much less pronounced in explaining the existence of unhealthy owner-occupied units. Generally speaking, the acute consequences of the Great Recession and the societal in-migration to urban areas have meant that suburbs like those in SKC suffer from disinvestment (also known as the Suburbanization of Poverty). The high levels of unemployment seen during the Great Recession deeply impacted personal finances and limited the amount of funds that homeowners could spend on proactive home maintenance and repairs. As the economy grows stronger, we posit that owner-occupied units in SKC continue to lack maintenance for three key reasons, resulting in occupants living in unhealthy housing conditions:

1. Homeowners are simply unaware of the relationship between their living environment and their health. As a result, they may not practice healthy home maintenance.
2. Homeowners, particularly low-income homeowners, lack the resources to properly maintain and/or rehabilitate their unit. This may be especially true of individuals buying a more affordable but poor quality home in need of substantial repairs.
3. Homeowners simply choose to let their units fall into decay.

Figure 2: Causal Model Explaining Unhealthy Housing in Owner Market
**Causes of Unhealthy Housing – A Summary**

The following four bullets summarize the key causes to unhealthy housing, as predicted by our causal models.

- Multi-family landlords lack regulatory and financial incentives to maintain the quality of their units.
- Renters and homeowners are unaware of connection between health and housing and as a result, unwittingly reside in units that negatively affect their health while failing to take action to remedy the problem(s).
- Homeowners lack or are unaware of financial resources available for home maintenance and rehab, such as rebate programs, the energy efficiency tax credit and city/county home repair programs.
- Tenants lack sufficient protection against retaliatory evictions, deterring them from taking anti-unhealthy housing actions.

The policies and programs we described in later chapters aim to directly address these causes.
CHAPTER 3: EXISTING POLICIES & PROGRAMS IN SOUTH KING COUNTY

Local governments, at the county and city level, currently implement two main categories of healthy housing strategies: personal financial support programs, including efforts like home repair programs and regulatory efforts including rental inspection programs. SKC renters also benefit to some degree from the state Landlord-Tenant Act. This chapter considers the effectiveness of these programs and some of their limiting factors. The gaps left by current programs and policies point to the additional strategies needed to improve health and housing in SKC. A brief summary is provided here, with further analysis throughout this chapter.

The existing suite of policies and programs targeted at improving the condition of housing units in SKC are well intentioned but ultimately insufficient to meet quality and health goals. For example:

- **Home Repair Programs**: These programs provide funding and repair services to households in severe need. However, the manpower required to sufficiently operate these programs, combined with the relatively small quantity of funds available and the per household cost of major repairs, severely limits the impact of these programs. Additionally, as discussed below, home repair programs are not equitably distributed among community members.

- **Rental Inspection Programs**: Tukwila is the only city in SKC with a rental inspection program. Tukwila’s experience displays the promise of such programs to limit code violations and, as a result, help ensure both quality of the unit and the health of its inhabitants. The other five cities are not currently utilizing this opportunity to identify and confront their housing health and quality issues.

Other elements of the status quo surveyed in this chapter may lack proper enforcement, clarity, utilization, and/or awareness. Specific barriers and concerns include:

- **Fear of Eviction**: Retaliatory evictions are illegal under Washington State law. While the Landlord-Tenant Act seeks to empower renters to take action against landlords that refuse to repair unhealthy home conditions, the burden of enforcement and accountability falls on the tenant. Interviews with staff from the Tenants Union of WA suggest that this protection often goes unenforced, leaving renters with little legal recourse against absentee landlords.

- **Tax Exemptions and Utility Rebates**: There are bounties of tax exemptions and rebate programs available to families for financing healthy home repairs and upgrades. However, it is likely that these programs go under-utilized because the target audience is unaware of their existence.

The remainder of this chapter examines these programs and discusses their value in detail. The chapter concludes with an evaluation of how these policies and programs fail to work together to improve health and housing.
3.1 Existing Programs & Policies Impacting Housing & Health in SKC

**Home Repair Programs**

All six cities we examined in South King County provide a home repair program to some extent. These programs provide either (a) free repairs for minor housing issues, (b) low-to-no interest loans to complete the repairs, or (c) typically a combination of both. These programs serve residents earning 80% of AMI or less, with preferences of order and amount given to those on the lower end of the income spectrum with the most pressing repair needs.

King County Department of Community and Human Services (DCHS) currently operates the Housing Repair Program, a countywide program that provides low-to-no interest loans for low-income residents to improve the quality of their homes. King County’s Housing Repair Program does not serve homes within cities that have their own programs. The program focuses on homeowners but does offer some assistance to renters seeking to address access needs.\[^{59}\] This program uses Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) dollars from HUD to fund the repairs while also recirculating loan repayments from residents back into the program. This structure makes DCHS dependent on receiving federal funds, the amount of which can fluctuate year to year and often arrives months later than anticipated (see graph below).\[^{60},\,61\] To help offset this reliance on volatile federal funding, the program is also designed to return funds from loan repayments over the course of several years.

\[^{59}\] Housing & Community Development Program, King County Department of Community and Human Services. “Housing Repair.” [http://www.kingcounty.gov/socialservices/Housing/ServicesAndPrograms/Services/HousingRepair.aspx](http://www.kingcounty.gov/socialservices/Housing/ServicesAndPrograms/Services/HousingRepair.aspx).

\[^{60}\] This insight was drawn from an interview with a King County Home Repair Program Official.

\[^{61}\] “King County Consolidated Annual Performance and Evaluation Report,” 2012-2014. Housing & Community Development Program, King County Department of Community and Human Services. [http://www.kingcounty.gov/socialservices/Housing/PlansAndReports/HCD_Reports/CAPER/Legacy%20CAPERs.aspx](http://www.kingcounty.gov/socialservices/Housing/PlansAndReports/HCD_Reports/CAPER/Legacy%20CAPERs.aspx).
King County also spends its CDBG funds on minor home repair programs. These programs seek to maintain and increase the health and safety of residents while preserving dwellings as “decent, safe and affordable housing.” Funds per project, whether a grant or a loan, vary substantially between King County's Housing Repair Program and the minor home repair program, which covers Renton, SeaTac and Tukwila. As the name suggests, minor home repair programs seek to address more minor, less expensive problems. Meanwhile, King County's Housing Repair Program makes its funds available for larger scale projects. The graph below depicts this difference, showing large per-project funding for King County Home Repair Projects (on the left) compared to smaller per-project funding practiced by the Renton and Tukwila Consortium Minor Home Repair Programs.

![Average Project Size, Home Repair Programs](image)

**Evaluating Home Repair Programs:** In an interview, a King County staff member indicated that the *King County Housing Repair Program is unintentionally underutilized by people of color and non-elderly populations* (and renters, although this group is not necessarily the program’s target audience). Conversations with the King County official suggested that non-white populations, especially those traditionally disconnected from or distrustful of government, simply are unaware of the program.

---

62 “Minor Home Repair Programs available in King County.” Housing & Community Development Program, King County Department of Community and Human Services. [http://www.kingcounty.gov/socialservices/Housing/ServicesAndPrograms/Services/HousingRepair/MinorHomeRepairPrograms.aspx](http://www.kingcounty.gov/socialservices/Housing/ServicesAndPrograms/Services/HousingRepair/MinorHomeRepairPrograms.aspx).

Table 4, below, illustrates the breakdown of demographic groups receiving King County CDBG home repair dollars. It shows a demographic imbalance in groups benefiting from repair programs. Furthermore, the impact of home repair programs is limited by finite resources, and is both a costly and time-consuming operation. As a result of limited resources, the repair program prioritizes emergency repairs and only reaches several dozen homes each year. As the King County Housing Repair Program is funded by CDBG dollars (and program revenues, to a lesser extent), it must make as many repairs as possible with a fixed yearly sum. Consequently, many homes that could benefit do not. The vetting process is lengthy and intensive. Program staff must ensure families applying for funds are income-eligible and must ensure that the problem is substantial enough to warrant use of scarce public dollars.

Table 4: Distribution of Home Repairs by Racial Group

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Projects</strong></td>
<td>72</td>
<td>240</td>
<td>77</td>
</tr>
<tr>
<td><strong>White households served</strong></td>
<td>57</td>
<td>187</td>
<td>51</td>
</tr>
<tr>
<td><strong>White, Hispanic households served</strong></td>
<td>2</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td><strong>Black / African American households served</strong></td>
<td>7</td>
<td>22</td>
<td>13</td>
</tr>
<tr>
<td><strong>Asian households served</strong></td>
<td>4</td>
<td>9</td>
<td>9</td>
</tr>
</tbody>
</table>


Further, based on interviews with multiple SKC cities, we found that the lack of a weatherization component in citywide programs severely limits impact on housing health. Broken windows and poor insulation greatly decrease the amount of heat a home can retain, thus reducing the overall health “score” of a rented or owned unit. Because weatherization can help a home become more energy efficient, it creates healthier homes and usually decreases utility costs in the process. Currently, no city in South King County offers weatherization as it is expensive and time-consuming per unit. The King County Housing Authority offers weatherization, but it consistently has a years-long waitlist.

**Building Codes**
Each city promulgates its own standards and minimum requirements to which built structures must adhere. Cities generally do not create their own housing codes but rather utilize model codes, such as those developed by the International Code Council (ICC). Building codes are designed to ensure the safety and health of building occupants. For example, the City of Tukwila utilizes the

---

2012 International Building Code (IBC). It is upon this code that Tukwila’s rental inspection program and all other code enforcement activities are based.

The International Property Maintenance Code (IPMC) governs and sets forth minimum maintenance requirements for existing buildings.65 The National Center for Healthy Housing (NCHH) notes that the IPMC is of critical importance to healthy housing as it “provides a road map to [the seven principles of healthy homes].”66,67 Despite its importance, the NCHH notes that the IPMC falls short of many of the provisions of the National Healthy Housing Standard68 produced by the American Public Health Association and the NCHH.

**Evaluating Building Codes:** South King County cities are not uniform in their use of the IPMC. Renton, SeaTac, Federal Way, and Tukwila all adhere to the IPMC. However, Kent and Auburn do not. As all code enforcement activities are based on these codes, cities that do not utilize IPMC are missing out on opportunities to enforce better building quality and health. As discussed in Chapter 5, building codes could include additional specifics related to healthy housing, an opportunity which none of the cities are currently taking advantage.

**Inspection Programs**

In 2010, the Washington State legislature passed legislation placing certain restrictions on the type of rental inspection programs cities can implement. Existing rental inspection programs, such as Pasco’s and Tukwila’s, are sometimes more stringent than state regulations presently allow since the state law allows existing programs to continue even if they deviate from the new limitations.

The current statute limits municipal inspection programs in the following ways:

- Inspections (or certificates of inspections) are limited to every three years, four years if there have been no code violations.
- Multi-family buildings with less than 20+ units are limited in inspections to only 4 units. For buildings with 21+ units, only 20 percent of all units may be inspected. All units may be inspected if there has been a code violation in the last year.69

**Tukwila’s Rental Inspection Program:** Since 2010, the City of Tukwila has operated a rental inspection program unique to SKC. The Residential Rental Licensing & Inspection Program addresses unhealthy conditions in rental units by requiring that all landlord-owned units are code

---

66 The seven principles are as follows: “dry, clean, pest-free, safe, contaminant-free, ventilated, maintained.”
compliant. If units fail inspection, landlords are required to make the necessary repairs and renovations. The Tukwila Department of Community Development performs one inspection for each property every four years. Neglecting certain criteria -- such as heat and standard plumbing -- is considered automatic failure while other issues like mold may only count for a small number of points. This is due to the program’s focus on habitability, prioritizing the most needed amenities.

Tukwila’s program is not designed to be punitive. Rather, the Department of Community Development aims to work with landlords whose properties fail the initial inspection to implement what changes and improvements are needed to pass a second inspection. With that said, Tukwila also reports having many “absentee landlords” who are incommunicative and unavailable to make the necessary improvements particularly if they are living outside of the area. These landlords do face penalties for inspection failure.

**Evaluating Rental Inspection Programs:** Anecdotal evidence, obtained in interviews with City staff, suggests that Tukwila’s rental inspection program has achieved some success in promoting code compliant units. As one indicator of success, Tukwila City employees reported that the number of code complaints from residents have decreased since the program was implemented.

<table>
<thead>
<tr>
<th>Table 5: Selected Programs and Policies by City</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Auburn</strong></td>
</tr>
<tr>
<td><strong>Home repair</strong></td>
</tr>
<tr>
<td><strong>Rental inspection</strong></td>
</tr>
<tr>
<td><strong>Building Codes</strong></td>
</tr>
</tbody>
</table>

*Auburn has a rental inspection program framework, but does not currently operate this program.*
**Tax Credits and Energy Efficiency Rebate Programs**

There is no shortage of programs aimed at inducing homeowners and multi-family homeowners to make energy-efficient upgrades and additions to their units, yet often these programs go underutilized for healthy housing repairs, and even more often may not target healthy housing for low-income households specifically. We examine the programs relevant to SKC briefly:

- **Puget Sound Energy (PSE)** offers cash rebates for energy-improving upgrades in residential units, including insulation and window replacement, which both are very applicable to healthy housing.70
- **Seattle City Light**, which covers portions of South King County, offers rebates similar to PSE combined with loans for certain repairs. The program, called Community Power Works, offers rebates for insulation installations, air sealing, and window replacements.71
- **The King County Property Tax Abatement** eliminates property tax on the improved portion of a property’s value for major additions and remodels. These abatements do not cover what is considered more routine maintenance, such as roof repairs, new paint, or window replacement, which is closely linked to healthy housing.72 As a result, this program may be useful for complete renovations to a dilapidated home but is less useful for more marginal repairs.
- **Federal Tax Credits** are available for certain weatherization-related residential improvements. Tax credits are available for a portion of the cost to install energy-efficient windows, doors, roofs, and heating systems.73

**Evaluating Tax Credits and Incentives:** Tax incentives for the energy saving measures discussed above do address a portion of the problems related to healthy housing. Weatherization and health are closely linked. Unfortunately, many of these incentives, which are aimed at reducing either a household’s property or income taxes, are less useful to low-income homeowners who pay little to none of these taxes already. Further, homeowners may require additional upfront financing to afford even modest repairs that will later return some rebate. It is also unclear to what extent target audiences are aware of the existence of these financing opportunities.

**Tenant-Landlord Regulations and Enforcement**74

For families living in unhealthy housing, the Washington State Residential Landlord-Tenant Act provides a framework to resolve disputes over unit maintenance and overall living conditions.75

---

74 Appendix D.1 provides additional information on relevant section of the Tenant-Landlord Act.
The process to escalate a landlord’s failure to bring a unit into compliance, however, is complicated and not an easy process to complete.

RCW 59.18.060 establishes the general duties of landlords and tenants with regard to upkeep of a unit. In addition to ensuring a given unit meets local code enforcement standards, landlords are required to “maintain the structural components including, but not limited to, the roofs, floors, walls, chimneys, fireplaces, foundations, and all other structural components, in reasonably good repair so as to be usable.” Conversely, tenants have a responsibility to maintain their unit during their tenancy and are responsible for paying for any damages they cause.

In cases where a landlord has failed to properly maintain a unit or is unable to bring a unit into compliance, a tenant has limited options, one of which involves taking their landlord to court. Because many municipalities in Washington State do not have proactive rental inspection programs, tenants must “self-enforce” the law themselves, meaning that the burden of responsibility lies with the tenant to know his or her rights and proactively take action against the delinquent landlord.

**Evaluating the Landlord-Tenant Act:** Without enforcement and proactive work from city officials, the self-enforced landlord-tenant act fails to meet the needs of many renters living in unhealthy conditions while essentially creating a de facto deterrent to tenant action against recalcitrant landlords.

While state law prohibits retaliatory action from being taken against a tenant exercising his or her legal rights (i.e. vengeful actions taken within 90 days of renters asserting their rights), state law does not control for retaliatory actions taken beyond that 90-day window. Landlords can attempt to avoid the civil authorities by waiting to serve an eviction notice without cause after the 90 days has passed.

Additionally, the public's understanding of the Landlord-Tenant act is slim, especially among people who speak English as a second language. Despite state law's prohibition of retaliatory action against a tenant exercising their legal rights, there is a fear among tenants that reporting concerns to a

---

78 See Appendix D for additional detail.
landlord may result in retaliation via rent increase\textsuperscript{80,81} or illegal evictions.\textsuperscript{82} Many tenants living in unhealthy housing are already cost-burdened, and this consideration, combined with the high competition for units in SKC and the broader region, helps to explain why tenants ignore poor conditions and often refuse to take actions against their landlord.

\textbf{Non-Profit Programs}
There are several nonprofit programs that target unhealthy housing within the King County region. While some organizations work, or have worked, with SKC cities at some point, there are some special examples of established collaboration across programs. For example, Catholic Community Services of Western Washington (CCSWW) refers large housing repair projects to Rebuilding Together Seattle.\textsuperscript{83} Below are a few key nonprofit players in King County:

\textbf{Housing Repair:}\textsuperscript{84}
- \textbf{Catholic Community Services of Western Washington (CCSWW)} runs a Volunteer Chore Services program to provide free minor home repair assistance for low-income elderly or disabled residents. CCSWW refers larger repair projects to Rebuilding Together.\textsuperscript{85}
- \textbf{Rebuilding Together Seattle} rehabilitates homes for low-income residents.\textsuperscript{86} Its home repair programs serve the greater Seattle area, from Everett to Burien.\textsuperscript{87}
- \textbf{Habitat for Humanity} operates several rebuilding projects in King County.\textsuperscript{88}
  - La Fortuna, Renton
  - Rainier Vista, Seattle
  - Westway, Federal Way
  - White Center, Seattle
- \textbf{Master Builders Care Foundation} hosts an annual program called Rampathon, in which volunteers use donated materials to install ADA compliant ramp access for older adults and residents with disabilities.\textsuperscript{89}

\textsuperscript{80} RCW 59.18.140. \url{http://apps.leg.wa.gov/RCW/default.aspx?cite=59.18.140}.
\textsuperscript{81} Tenants Union of Washington State: Rule Changes & Rent Increases. \url{http://www.tenantsunion.org/en/rights/rule-changes-rent-increases}.
\textsuperscript{82} Per interview with Tenants Union of Washington State.
\textsuperscript{83} Catholic Community Services of Western Washington. “Volunteer Chore Services King County.” \url{http://www.ccsww.org/site/PageServer?pagename=volunteerchore_kingcounty}.
\textsuperscript{84} Habitat for Humanity Seattle-South King County. (2011). “Housing Repair and Weatherization Resource Listing.” \url{http://www.habitatskc.org/wp-content/uploads/King-Sno-Pierce_RepairPrograms_201107151.pdf}.
\textsuperscript{85} Catholic Community Services of Western Washington. “Volunteer Chore Services King County.” \url{http://www.ccsww.org/site/PageServer?pagename=volunteerchore_kingcounty}.
\textsuperscript{86} Rebuilding Together South Sound. “Year Round Program.” \url{http://rebuildingtogetherss.org/our-programs/year-round}.
\textsuperscript{87} Rebuilding Together Seattle. “Homeowner Application.” \url{http://www.rtseattle.org/homeowner/}.
\textsuperscript{88} Habitat for Humanity Seattle-King County. “Current Neighborhoods.” \url{http://www.habitatskc.org/current-neighborhoods/}.
\textsuperscript{89} Master Builders Association. “Rampathon.” \url{http://www.masterbuildersinfo.com/index.cfm?Community=Rampathon}. 
Home Assessment:
- **American Lung Association** currently offers free Healthy Home Assessments to Seattle residents.\(^9\) They also provide a Home Environmental Assessment List (HEAL) upon request to residents interested in conducting their own assessment.\(^9\)

Tenants' Rights:
- **Tenants Union of Washington State** runs a tenant hotline and advocates for the rights of renters to have healthy homes.\(^9\) This includes ensuring landlords make necessary repairs and assisting tenants in their communications with their landlords. Examples of targeted issues include bed bugs, mold, air quality, and relocation assistance.

Other Involvement:
- **Enterprise Community Partners, Pacific Northwest** funds capital investments for affordable housing projects guaranteed to be affordable for low-income households with the intent of maintaining affordability and sustainability.\(^\)\(^9\) In 2014, the organization launched its Health and Homes Initiative, which intends to link housing with health care and its impact on vulnerable populations in Oregon, and has expressed further interest in King County initiatives.\(^4\)

**Evaluating Non-Profit Contributions:** While these non-profit run programs provide needed services to SKC and the surrounding region, there are missed opportunities to collaborate and coordinate services.

3.2 **Evaluating How Status Quo Policies Fail to Work Together Toward Healthy Housing Goals**

The above programs and policies represent a piece of the puzzle in improving health and housing quality in SKC. Yet this existing suite of programs does not fully address the complex nature of unhealthy housing as evidenced by its persistent presence in the region. To understand where these programs and policies fall short, we evaluate them against three of the relevant goals that this analysis aims to achieve (see Chapter 4 for an additional discussion of these goals).

**Do Existing Programs Improve Health?**

**Homeowners:** Local home repair programs and building codes improve the health of SKC residents some, but many do not receive such benefits. Since both non-profit and city run home repair programs are limited by the funding available, many homeowners in need will not receive any

---


benefits. When denied home repair funding, there are few alternatives and incentives to help make repairs more financially feasible for those with low-incomes. Existing tax credits are mostly tailored to energy efficiency and extensive remodels. For example, a repair to a roof or to upgrade interior piping is not eligible for weatherization rebates or King County's Property Tax Abatement. Homeowners may be able to receive a loan from a local bank if they have built sufficient home equity, but barring this, many low-income households will continue to live in unhealthy conditions.

Renters: The situation is worse for renter households suffering from unhealthy housing. While building codes may be meant to ensure some standard of habitability, many renters do not benefit from these policies without proactive enforcement by local jurisdictions. When tenants live in a unit needing repairs, many choose not to report their concerns to their landlord or to the city for fear of eviction. The Landlord-Tenant Act does not provide sufficient protection for tenants who could be consumed by court proceedings in cases where they resist an eviction notice, even if it is illegal.

Renters are also disadvantaged due to the lack of funding available for repairs to privately owned units. Zero- and low-interest loans made available in home repair programs and local non-profit run programs do not target the rental market specifically. As a result, low-margin property owners may lack sufficient resources to make repairs to their units, and without inspections, may continue to rent these units to renters with few other affordable options. Few funds are made available for rehabilitation of rental units in SKC, and non-profit capacity is limited, though local non-profits do acquire and rehabilitate buildings from time to time.95 Under the status quo, there is no program in SKC providing consistent funding for rehabilitation of rental units.

Finally, while health assessments are available through non-profits like the American Health Association, there are no formal linkages between such programs and resources to assist families over time in remediying these situations.

Do Existing Programs Improve Housing?
Aside from Tukwila, local policies do not provide sufficient incentives for landlords to maintain their units over time – either by making it financially or legally unwise to operate unhealthy units or by supplying low-cost financing or incentives. For homeowners, local property tax incentives focus on additions or major remodels and not necessarily routine maintenance. The local non-profit housing development community does assist with some preservation of affordable rental units, but there is no consistent funding stream for these projects in SKC.

**Are Existing Programs Equitable?**

The King County Housing Repair Program and the minor home repair programs effectively serve extremely low and low-moderate income families.\(^96\) However, as mentioned above, low-income white families disproportionately benefit from these programs. Furthermore, families dwelling in rental housing – whom are more likely to be low-income and people of color – are at a disadvantage given the general lack of proactive rental inspection programs, the absence of proactive protections in the state’s Landlord-Tenant Act, and limited public funds for affordable housing preservation and improvement.

As explained above, the Landlord-Tenant Act does not provide sufficient protections for tenants seeking upgrades to their rental unit. As a result, they may experience displacement due to rent increases, illegal evictions, or other reasons. Somewhat perversely, displacement also is minimized through this reality: due to a fear of eviction, many households may consciously continue to live in unhealthy housing.

There is also a high potential for displacement and a loss of affordability if the owner of a dilapidated and expensive-to-maintain property decides to sell it to a new developer for redevelopment. The resulting new housing is likely to be much less affordable than the current housing if it receives less drastic upgrades but is maintained as older, healthy housing. By not requiring or incentivizing more regular maintenance, the current arrangement of policies and programs in SKC contributes to greater inequities.

---

CHAPTER 4: EVALUATING POLICIES AND SOLUTIONS

As Chapters 2 and 3 explained, a range of programs and policies already exist to address portions of the unhealthy housing problem in South King County, yet there are considerable gaps in coverage, as evidenced by the ongoing and severe nature of unhealthy housing. This chapter explains the framework used to evaluate the recommended best practices presented in Chapter 5 (and those examined in Appendix A).

The goal of the evaluation for each policy or program option is to assess the strengths and weaknesses based on a set of consistent criteria. From here, we can ultimately determine the set of best practices that SKC cities can implement individually or collectively to improve housing quality in the local community.

**Criteria for Evaluating Solutions**
Examining the range of options available requires a set of consistent criteria to effectively measure the strengths and weaknesses of each program or policy. These criteria should reflect the degree to which the strategies achieve certain goals related to solving the healthy housing problem. The goals against which we measure each solution are as follows:

1. **Improves Health**: Does the policy or program improve the health outcomes of those living in unhealthy housing conditions?
2. **Improves Existing Housing**: Does the policy or program improve the condition of existing affordable housing?
3. **Equity**: Does the policy or program equitably serve people of color and low-income populations while preserving affordability and minimizing displacement?
4. **Financial Feasibility**: Can the program or policy be funded and implemented within local capacity?
5. **Implementation Requirement**: Does the policy or program require a change to state or local law or a local funding allocation?

In turn, our criteria for each goal reflect measures of how each strategy contributes to furthering this goal.

1. **Improves Health**
   a. Magnitude of impact on health of homeowners
   b. Magnitude of impact on health of renters
2. **Improves Existing Housing**
   a. Improves the quality of local affordable housing
3. **Equity**
   a. Minimal to no displacement
   b. Preserves the affordability of existing housing
c. Impact on people with low-incomes, people of color, immigrants and other vulnerable populations

4. Financial Feasibility
   a. Cost to implement at local level
   b. Immediacy of impact
   c. Existing infrastructure in place to implement the program
   d. Certainty of Impact

5. Implementation Requirement
   a. Is a state or local law change or budget allocation required?

**Evaluation Methodology**

The following chapter includes an evaluation for each recommended policy or program. In this evaluation, the baseline for comparison is the “status quo” – the set of policies and programs currently in place in SKC. We make one critical assumption: the “status quo” does not include rental inspection programs, as Tukwila is the only city of six to have this policy in place.

Finally, each policy and program below is given one of five designations for its performance against the above goals:

- Two plus signs (++) denote a “very good” improvement against the status quo
- One plus sign (+) denotes a “good” improvement against the status quo
- An equal sign (=) denotes “no change” from the status quo
- One minus sign (-) denotes a “poor” change from the status quo
- Two minus signs (--) denotes a “very poor” change from the status quo

For the financial feasibility goal, instead of using the plus and minus system, we use dollar symbols (from one to four) to represent the magnitude of costs associated with each program relative to the status quo.

**Political Feasibility**

Our criteria above do not include political feasibility as information to assess this factor was not readily available and because the political calculus for many of the options discussed in Chapter 5 will be similar, as private property owners in the rental market may strongly oppose any interventions in the private market. This opposition should not discount an option entirely from consideration. See Appendix C for an in-depth discussion of political feasibility.
CHAPTER 5: RECOMMENDED BEST PRACTICES TO ADDRESS UNHEALTHY HOUSING IN SOUTHERN KING COUNTY

This chapter discusses and evaluates six recommended best practices to address the prevalence of unhealthy housing in South King County. These best practices were selected after an extensive literature review of national solutions and were evaluated based on the criteria discussed in Chapter 4. Additionally, these six policies were included because they effectively address a cause of unhealthy housing not sufficiently targeted by the current suite of programs offered in SKC. Appendix A includes discussion of four additional strategies that were analyzed but not selected as recommended best practices. See Appendix F for a matrix showing evaluation of all options.

The best practices are grouped into categorizations based on their point of intervention on the renter and owner-occupied causal models discussed in Chapter 2. This categorization is used to illustrate the importance of each option in resolving important causes of unhealthy housing – such as a lack of information for residents or insufficient financial resources.

<table>
<thead>
<tr>
<th>Recommended Best Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Access to Information for Renters and Homeowners</strong></td>
</tr>
<tr>
<td>• <strong>Community Health Workers</strong>: Provide in-home visitation to assist residents in identifying environmental concerns contributing to negative health outcomes.</td>
</tr>
<tr>
<td><strong>Multifamily Property Owner Incentives and Regulations</strong></td>
</tr>
<tr>
<td>• <strong>Adopt National Healthy Housing Standard</strong>: Implement elements of NHHS into local building codes, raising standards for health and housing quality.</td>
</tr>
<tr>
<td>• <strong>Proactive Rental Inspection Programs</strong>: Require business licenses and inspections of rental housing units on a periodic basis.</td>
</tr>
<tr>
<td>• <strong>Code Compliance Loans</strong>: Provide low-interest loans to low-margin property owners to make necessary repairs more financially feasible.</td>
</tr>
<tr>
<td><strong>Tenant Support Policies</strong></td>
</tr>
<tr>
<td>• <strong>Just-Cause Eviction Ordinance (JCEO)</strong>: Adopt JCEO to add extra protection for tenants by requiring property owners to cite one of a few just causes when evicting.</td>
</tr>
<tr>
<td><strong>Additional Local Capacity</strong></td>
</tr>
<tr>
<td>• <strong>Regional Acquisition Fund</strong>: Pool funding to assist non-profits in purchasing, rehabilitating, and preserving affordable healthy housing in SKC.</td>
</tr>
</tbody>
</table>
Each discussion of the six best practices in this chapter includes a description of the program or policy, an evaluation based on the goals described in Chapter 4, a logic model and action plan, and examples of the programs in action. Analyses for four additional strategies for addressing unhealthy housing are not included in Chapter 5. These can be found in Appendix A.

5.1 Increasing Access to Information for Renters and Homeowners

A key cause of the ongoing unhealthy housing problem in SKC in both the rental and homeownership markets is a lack of information. This lack of information includes knowledge of the connection between housing quality and health, the rights of tenants, and the many programs and resources currently available to improve the health of one’s housing. This section analyzes programs that address this lack of information.

Community Health Workers:
Home Visitation, Outreach & Education Programs

Oftentimes low-income families, particularly English language learners, do not have access to the information and resources necessary to make positive health changes related to their housing conditions. In some cases, families may not understand the connection between their housing conditions and their health and may continue to live in preventable unhealthy housing situations. Community health workers (CHWs) are powerful methods of improving health outcomes for both rental tenants and homeowners by increasing awareness of the connection between housing and health. CHWs are especially effective in improving outcomes for those in immigrant communities who may be disconnected from service providers. To help improve access to information and accompanying health outcomes, this analysis recommends that SKC implement a CHW program.
**Description of Program**

CHWs are an evidence-based means of providing health information and services to economically disadvantaged communities. 97 CHWs are community-based intermediaries that link social service and health service agencies to communities in order to “facilitate access to services and improve the quality and cultural competency of service delivery.” 98 In the context of healthy housing, community health worker interventions are designed to educate individuals of the connection between their living environment and their health. CHWs visit homes and suggest actions and strategies to mitigate chronic health conditions, such as asthma, through the elimination of in-home irritants. When serving populations that live in rental housing, CHWs can be trained and directed to instruct tenants on their rights to quality living conditions. More importantly, a CHW can help empower the residents to action by instructing them of the steps required to take action and apply for any services that may exist to help, like free legal services.

The promotores model is one prominent use of CHWs that has been implemented in Latino communities. Promotores is described as a “social change model” that can be “implemented with any issue ... because it is the quality of the relationships, not a particular issue area, which has the potential to create community change.” 99 According to Vision y Compromiso, the promotores model follows three stages:

1. Relationship building
2. Information sharing
3. Community participation through individual and collective action

As described in a recent CDC report, promotores and CHWs can support the prevention and control of chronic disease through these relationships and connections to the community by: 100

- Bridging cultural mediation between communities and the health care system
- Providing culturally appropriate and accessible health education and information
- Ensuring that people get the services they need
- Providing informal counseling and support
- Advocating for individuals and communities
- Providing direct services
- Building individual and community capacity

---


CHWs are particularly effective by drawing providers from the same communities in which they work. This enables them to serve as trusted advisors who provide culturally competent in-home services while drawing clear connections between a resident’s living conditions and their health.¹⁰¹,¹⁰²

**Evaluation of Program**

**Improves Health: Significant Health**

*Improvements for Homeowners & Renters*

Rigorous academic studies find that community health worker interventions are an effective means of improving targeted chronic health conditions ranging from asthma to non-housing related conditions like hypertension and cancer.¹⁰³,¹⁰⁴ They do so by penetrating the home and drawing tangible and actionable connections between one’s living environment and health conditions that are not possible with other health service arrangements or the passive delivery of information. Specific experiences like King County Public Health’s “Health Homes” effort demonstrated the direct applicability of community health workers to healthy housing.¹⁰⁵

**Improves Existing Housing: Marginal Improvements to Housing Quality**

CHW interventions will have little substantive impact on improving housing quality if implemented on their own. Improvements will likely occur on a small scale as a result of a CHW assessment for several reasons:

- Low-income homeowners may be limited in the amount of income or savings they have available to make substantial repairs. Therefore, on average, repairs made by homeowners will likely be small and inexpensive in scale.
- Some landlords will make repairs when they become aware of housing issues reported by tenants. More expensive repairs, some of which may require loans or other financing, may not occur, particularly as property owners with few units (less than four) typically do not have the profit margins or savings to do so. Furthermore, research suggests that small

---


¹⁰⁴ http://www.cdc.gov/dhdsp/docs/chw_brief.pdf, pg. 2

multifamily property owners can be unattractive loan recipients (see section 5.2’s discussion of Code Compliance Loans for further detail).

- Finally, without a just cause eviction or similar policy in place, other landlords will discourage tenants from reporting issues altogether by intimidating them under threat of a retaliatory eviction (see section 5.3 for more on just cause evictions for further detail). By limiting complaints and the reporting of issues, some pressing improvements will not be made (either voluntarily or as required by city code enforcement).

Although renters living in multifamily units will have limited opportunity for actions, especially if a property owner is unwilling to make repairs, CHWs can empower tenants by informing them of their rights and even potentially contacting property owners on the tenant’s behalf. Newly alerted to problems, some landlords will make repairs. However, other landlords may be unwilling to make repairs. The current State Landlord-Tenant Act, in practice, discourages tenants from taking action, which will be described in full in the Tenant Protection Policies section below. Overall, CHWs will likely inspire residents to make behavioral changes, such as turning on a fan to avoid condensation buildup and mold, which will lead to marginal improvements in housing quality. However, for individuals suffering from more severe unhealthy housing conditions, CHWs provide limited impact on major quality improvements.

**Equity: Significant Health Improvements for Low-Income and Immigrant Community Members**

CHWs excel in targeting and serving the health needs of populations disconnected from the medical and municipal systems, such as immigrant and other low-income communities. As mentioned above, CHWs accomplish this by using the trust they have earned as community members and knowledge of the cultural context to provide highly relevant services and information that otherwise might be turned away or go unheeded.

Displacement is unlikely to occur as the result of a CHW intervention as programs focus on empowering residents to make healthy housing improvements at their own pace. There is potential for displacement to occur, either temporarily for renovations or permanently due to higher rents or redevelopment, if landlords become aware of large problems that require full-scale renovations, especially if a local jurisdiction lacks tenant relocation provisions.\(^{106}\) But, as discussed above, CHW programs alone are unlikely to lead to major housing repairs or renovations. Therefore, CHW intervention is less likely to lead to significant rent hikes.

---

\(^{106}\) See discussion of Tenant Relocation Assistance in Chapter 7’s Further Research.
Financial Feasibility: Potentially Requires Significant Budget Allocations

Despite offering strong social benefits, start-up costs for CHW interventions are fairly expensive and take concerted planning. CHWs must be trained and salaries must be funded. Research shows that CHW programs that do not include major home repairs or upgrades can cost between $200 and $1700 per person depending on the intensity of the intervention.\(^{107}\) In one study of the cost effectiveness of CHWs for Hispanic adults with diabetes, per-participant costs were $783.75 for a 12-month period.\(^{108}\) CHW interventions could be eligible for at least partial funding through Medicaid. (See Appendix B for a discussion of this option.) There are also scenarios in which CHWs could be funded by social impact bonds which could alleviate some of the costs to local cities.

Implementation Requirement: Requires City Budget Allocation

A CHW program does not require any policy change. Rather, it requires a budgetary allocation, likely implemented through a contractual relationship with a nonprofit organization or public health agency. (See Appendix C for further discussion of political feasibility considerations.)

Logic Model & Action Plan

Funding Sources:

City-Led Funding Options
- City budget appropriations as part of a funding agreement between city and local nonprofit

Non-City Funding Options
- Grants: Communities of Opportunity Grants, Seattle Foundation
- Bill CHW visits to Medicaid
- Social Impact Bonds

See Appendix B for discussion of innovative funding options.

http://www.cdc.gov/pcd/issues/2012/12_0074.htm
To implement a Community Health Workers program, we recommend cities do the following:

1. **Perform needs analysis of community to determine how many families are suffering from unhealthy housing conditions and the specific kinds of ailments present in the community.** Determine how many community health workers will be needed to serve this population over a given time period. Identify other community issues that CHWs may be able to address, such as informing tenants of their rights.

2. **Determine CHW program funding source and program administration requirements (i.e. which organization should employ the CHWs – non-profit, cities, or some other entity).**
   - Cities could consider partnering with Global 2 Local (G2L) to get started. G2L currently operates a community health worker program targeted at weight loss in the Somali and Latino communities. The cities of Tukwila and SeaTac are partners in this effort. G2L may therefore already have the knowledge base and community connections in place required to recruit, train and implement a CHW model.
   - If partnering with an external nonprofit organization, cities can offer some combination of in-kind donations (through staff support) and explicit funding appropriations.

3. **Ensure proper training of CHWs.**

4. **Develop and execute marketing plan to generate awareness and interest in the CHW program.** At this point, the CHW intervention can begin.

**Program Examples & Variations**

CHWs have been implemented in multiple jurisdictions across the country, including:

- **Clinton County Healthy Neighborhood Program (HNP):** The program targets housing in high-risk areas that are identified using housing, health, and socioeconomic indicators from census and surveillance data. The HNP uses a combination of door-to-door canvassing (roughly 67 percent of visits) and referrals (32 percent of visits) to reach residents in these high-risk areas. During a visit, the home is assessed for environmental health and safety issues. For problems or potential hazards identified during the visit, an outreach worker provides education (written and verbal), referrals, and products to help residents correct or reduce housing hazards related to the home. Individuals are referred to other County agencies/services as applicable.109

- **Multnomah County Asthma Referral Programs:** Medical providers make referrals for patients to one of two programs: 1) a Healthy Homes program lasting for six months where an educator and community health worker visit a home and provide educational resources and help build an asthma action plan; or 2) an Asthma Inspection Referral Program (AIR) which includes an environmental health specialist who helps households identify asthma triggers.110 CHW visits are billed to the state's Medicaid plan for visits to Medicaid-eligible households. (See discussion of using Medicaid as a funding source in Appendix B.)

- **Phoenix Healthy Homes:** The Phoenix Neighborhood Services Department and the Phoenix Children’s Hospital developed a collaborative program that linked care, education and resources to improve health outcomes. In this program, a visual home assessment was used to “examine 29 potential injury hazards and seven potential respiratory hazards, and it was accompanied by a home specific intervention ... designed to provide the children’s

---


parents or caretakers with the knowledge, skills, motivation, supplies, equipment, and minimum housing conditions necessary for a healthy and safe home.”

5.2 Multi-Family Property Owner Incentives and Regulations

Unhealthy housing as it presents itself in the rental market is a complex problem with multiple causes. A main source of the ongoing problem of unhealthy housing in the rental market originates from a lack of financial and regulatory incentive for property owners to maintain unit quality. The following strategies can be implemented to help correct these financial and regulatory incentives by creating higher building code standards and/or adopting proactive rental inspection programs, while offering additional financial incentives to make repairs more financially feasible for low-margin property owners.

Adopt National Healthy Housing Standards

All code enforcement activities undertaken by cities are predicated on their set of building codes. Unfortunately, many local building codes lack specificity and clarity on issues relating to health, leading to different interpretations and standards. To ensure that buildings and their property owners are held to the highest possible quality and health standard, this report proposes that all SKC cities update their local building codes to include all, or some, of the “National Healthy Housing Standard.”

---


Description of Program
The National Healthy Housing Standard (NHHS) offers suggested codes for cities to adopt on the following topics: 113

- Structures, Facilities, and Plumbing
- Safety and Personal Security
- Lighting and Electrical Systems
- Thermal Comfort, Ventilation, and Energy Efficiency
- Moisture Control, Solid Waste, and Pest Management
- Chemical and Radiological Agents

Multiple national stakeholders – such as Charley Shimanski, President and CEO of Rebuilding Together – have gone on record to support the NHHS, identifying its comprehensive, equitable approach to providing healthy homes.114 It is important to note that updating building codes would have a disproportionately large impact on new construction. Further, adopting the NHHS should be paired with code enforcement or a rental inspection program in order to impact the existing housing stock.

Evaluation
Implements Health: Marginal Health
Improvements without New Code

<table>
<thead>
<tr>
<th>Goals &amp; Evaluation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Improves Health</td>
<td>+</td>
</tr>
<tr>
<td>Improves Existing Housing</td>
<td>=</td>
</tr>
<tr>
<td>Equity</td>
<td>-</td>
</tr>
<tr>
<td>Financially Feasible</td>
<td>$</td>
</tr>
<tr>
<td>Implementation Requirement</td>
<td>City code change</td>
</tr>
</tbody>
</table>

Enforcement Policies
By adopting the more stringent health standards offered by the NHHS, code enforcement officials will be empowered to hold units to higher and healthier standards. Similarly, all new units constructed within city limits will be required to meet the new NHHS. However, cities are hampered by their current code enforcement policies; namely, all cities except for Tukwila operate reactive code enforcement programs. So, without a program ensuring compliance across all units, it is difficult to know to what extent units would actually be maintained to the NHHS standard. With that said, the adoption of the NHHS will only marginally impact health outcomes relative to the status quo.

Improves Existing Housing: *May Raise Costs of Improvements, Discouraging Repairs*
Existing housing will improve insofar as all building activity that requires building permits will be held to the NHHS. However, on its own, it does not encourage improvement and preservation; rather, it might actually discourage some building improvements by increasing the cost of doing so. The NHHS is a more stringent set of codes than the next best alternative. As a result of these higher standards, all else equal, it may cost more to build a NHHS compliant unit than its alternative as new or more expensive materials may be required.

**Equity: May Produce Some Displacement with Enforcement**
Adopting the National Healthy Housing Standard does not specifically target one segment of the population over others. Displacement is not a likely consequence of updating building codes, but it could be the result of the enforcement of new codes. For example, even under current reactive code enforcement strategies, employed by all SKC cities aside from Tukwila, violations that come to the attention of code enforcement will need to be addressed. However, meeting code requirements may require significant construction activities and be very expensive. They may, therefore, be subject to the NHHS. Property owners lacking the funds necessary to make the required improvements may close or sell the property in lieu of rehabilitation. Displacement would occur in this case. Without any additional enforcement activities to those currently in place, displacement will occur only slightly more than it does now by adding to the cost and scale of rehabilitation projects. As a result, the addition of the NHHS may not on its own produce equitable outcomes and should be paired with proactive code enforcement and tenant protections against eviction.

**Financial Feasibility: Current Capacity Exists to Develop and Implement the NHHS**
Cities already have code enforcement staff, as needed to enforce current code. The most pressing cost associated with adopting the NHHS involves staff time related to developing a specific proposal of what standards to adopt in their building code.

**Implementation Requirement: Requires Change to City Code**
Adopting the NHHS requires a change to city code, which will require political support. However, because it requires no additional funding, policymakers may be more interested in this option than other more costly ones. It remains unclear how property owners would respond to a proposal to adopt the new code, but there could be significant opposition from those that believe the city is

---

simply layering more regulation on the industry. See Appendix C for further discussion of political feasibility considerations.

**Logic Model & Action Plan**

To implement the National Healthy Housing Standard, we recommend cities do the following:

1. Identify where existing city building code differs or falls short from the NHSS, and construct revisions to existing city building codes.
2. Create a political strategy to garner support from property owners, including providing opportunities for public discourse and addressing the inherent benefit of increasing tenant reporting of housing conditions.
3. Pass city law change authorizing changes to city's building code.
4. Distribute marketing materials and hold public meetings to inform renters and landlords of what the law means and how it impacts both parties. Inform renters and landlords of any new processes related to the ordinance, such as new mechanisms through which to lodge complaints.
5. Enforce the law using current code enforcement mechanisms.

**Policy Examples & Variations**

- **Portland, OR, Housing Code – Healthy Home Provisions**: Portland City Code has worked in conjunction with the National Center for Healthy Housing to comprehensively update housing codes to meet healthy standards.116

- **New York State’s Prevention Plan 2013-2017**: In an action plan to promote a healthy and safe environment, New York State identified the NHHS as an opportunity point to improve the design and maintenance of homes to promote health and reduce illness.117

---


Proactive Rental Inspection Programs

With no regular check on their housing units’ quality, many property owners lack both the regulatory and economic incentives to maintain their units. While building codes provide standards for housing quality and health, without active enforcement, many units will fall out of compliance. In order to ensure property owners in the rental market are in compliance with health and quality standards, SKC cities should implement rental inspection programs.

Description of Program

Rental inspection programs are one impactful way that SKC cities can respond to unhealthy housing conditions in the local rental market. Inspection programs explicitly target the goal of improving housing quality and resident health in the rental market by requiring that property owners have their rental housing units inspected once every few years. This inspection provides an opportunity for the city code inspection staff to hold landlords accountable for abiding by city code requirements. Typically, these programs are implemented with little burden on the typical taxpayer; instead, landlords are asked to pay for a business license that covers at least a portion of the cost of the city program.

While rental inspection programs are allowed under Washington State law, in 2010 the legislature enacted limitations on what provisions cities could include in new programs. Under these limitations, cities can require inspections not more than every three years, and four years if the property owner can provide certification that they were found code compliant within the last four years. For larger multifamily buildings with more than 20 units, state law restricts cities to inspecting only 20 percent of a building’s total units, as the units selected are representative of the building’s overall condition.

At least four cities in Washington State (Pasco, Mount Vernon, Tukwila, and Seattle) have implemented rental inspection programs, each with their own variations that cater specifically to the needs of the local community. Rental inspection programs in SKC should appropriately target a wide range of health issues, weighing certain health issues more heavily than others. Many rental inspection programs inspect for building code violations, including structural concerns, the presence of mold, sufficient and working plumbing, and basic standards such as existence of

119 Ibid.
kitchen and bathroom facilities. Some programs also include criteria aimed at identifying overcrowding.\textsuperscript{120}

Despite restrictions on new rental inspection ordinances, SKC cities still have considerable room to design their programs in ways that are financially feasible and incentivize proactive maintenance. First, inspection programs would require that property owners purchase a business license, ensuring that all rental properties can be identified for inspection. These fees can be used to partially fund the program. Second, cities can design their programs to incentivize good behavior by allowing longer periods between inspections, once a landlord shows proper maintenance and code compliance, essentially creating a tiered set of properties as the city of Minneapolis has done.\textsuperscript{121} Minneapolis repeats rental inspections anywhere from one to eight years apart.

\textbf{Evaluation of Program}

\textbf{Improves Health: Significant Health Improvements for Renters}

Inspection programs can certainly have a positive impact on the health of renters.\textsuperscript{122} Landlords will be required to both register their properties and maintain them over time, or face fines, and this will have a direct impact on the health impacts discussed in Chapter 2. By meeting building code standards and making the required repairs to be in compliance, many issues that cause poor health outcomes, like broken ventilation systems or leaks, will be rectified. Resident health will improve while reducing the risk that health conditions related to the home environment will develop.

\textbf{Improves Existing Housing: Significant Improvement to the Existing Stock of Housing}

Researchers have found that a proactive rental inspection program can successfully “[decrease] the number of housing complaints from citizens, [decrease] the number of residential fires, and [prompt] landlords to invest in maintenance and timely repairs of rental properties.”\textsuperscript{123} After an


\textsuperscript{123} http://ghc.illkd.com/wp-content/uploads/2008/04/enhancinghousingquality.pdf
inspection program was implemented in Austin, Texas, “the number of residential fires decreased by 50 percent during the period when the city required proactive inspections of all units.” A key benefit of inspection programs is that they encourage ongoing maintenance of housing units, which may in fact also benefit property owners who may otherwise defer regular maintenance, allowing minor problems to develop into major, extremely costly problems. In this way, rental inspection programs may actually save landlords money in the long term.

**Equity: Unclear and Potentially Damaging Effect for Very Low Income Residents**

A potential concern is that inspection programs will raise costs for renters or even result in displacement. Under a rental inspection program, particularly if applied only in small geographies, landlords may try to raise rents in response to higher demand for higher quality units and in order to recoup the cost of repairs, but substantial, and potentially displacement causing, rent increases are not likely to be a major concern for the average SKC renter for two reasons:

1. Because a large number of repairs will be inexpensive and won’t require large (if any) rent increases to recoup costs, and
2. Because the market will only support rents at or below a certain level. Despite the cost of expensive repairs, rents can only rise so high before there is no longer demand for a unit priced at that amount. As a result, property owners will not be able to substantially increase rents for the average renter following expensive repairs because the market will not support it. This point is expanded upon below.

Currently, property owners likely decide against making expensive repairs because the market does not support the rent level required to make it a profitable decision, as discussed in section 2.2. As a result of inspections, landlords would likely market their newly upgraded units to a relatively higher-income segment of the population that is able to afford more expensive rents and provide the property owner’s required return on investment. However, the extent to which property owners in SKC could raise rents is greatly limited by the prevailing market conditions. Namely, households searching for homes in SKC are looking for lower cost housing. If property owners sought higher rents, they may face difficulty in finding a tenant as potential tenants may no longer be able to or interested in living in these units. Therefore, it is more likely that the property

---


125 To expand further on this point, one of the likely causes of unhealthy rental housing in SKC is that incomes are considerably lower in there than elsewhere in King County. Property owners considering expensive repairs and upgrades are deterred from taking action as a result, as the rents produced by supply and demand do not support the costs of repairs that profit driven property owners would need to pass on to maintain margins satisfactory to them.

126 See the beginning of section 2.1 and the discussion of SKC’s demographics and below AMI incomes.
owner will be forced to accept a lower-than-optimal rental rate that does not quite return the profit margins desired for completing such a repair or upgrade. This is substantiated by Gardner’s research, which states that “larger than average profits currently derived from neglected properties would likely diminish over time as the average quality of the rental housing stock goes up.”¹²⁷ In summary, current supply and demand act as a check on substantial rent hikes that could otherwise result in displacement. If, however, conditions change such that potential tenants are willing to pay more for housing in SKC, property owners will likely take advantage of higher potential rent payments and make an effort to capture this market.

Still there is potential for some displacement, especially for low-income populations.¹²⁸ This will likely occur under the following three scenarios:

1. Some property owners that are unable to fully recoup the high cost of maintenance will look to “flip” their units to new developers that can produce housing that earns higher profits either by attracting higher rents or operating at lower costs. Tenants will be displaced in the process of demolition and redevelopment.

2. Tenants will be temporarily displaced while larger-scale repairs or improvements are being made as the property owner seeks to comply with code.¹²⁹

3. Units requiring expensive upgrades but that are renting at levels affordable to the region’s low-income residents will increase rents as high as the market can bear, perhaps even risking vacant units in order to recoup the cost of upgrades. Especially for very low-income families, even small rent increases may force a household to seek alternative housing. Unable to afford these new rents, tenants will be displaced or accept higher cost burdens.

The third scenario demonstrates that renters with low to extremely low incomes may indeed be vulnerable to displacement as a result of repairs motivated by the rental inspection.¹³⁰ To help limit the impacts of displacement on low-income residents resulting from renovation, demolition and redevelopment, cities can pursue tenant relocation assistance programs (discussed in Chapter 7’s future research section). However, the third scenario likely cannot be completely mitigated.


¹³⁰ However, it is hard to predict the extent to which displacement may occur in the third scenario without data on how many units affordable at 30% AMI are in need of substantial repairs, and without hard displacement data from Tukwila’s experience. Future research should target both of these points.
In cases where displacement does not occur,\textsuperscript{131} rental inspection programs are particularly impactful for vulnerable populations, including immigrants, who may be less likely to report unhealthy housing conditions in their unit.\textsuperscript{132} Crucially, inspection programs do not rely on tenant complaints, which lowers displacement concerns as a result of retaliatory evictions (see discussion of tenant support policies below).

**Financial Feasibility: Potential to Operate Self-Sufficiently**

At its heart, a rental inspection program aims to enforce existing code and hold property owners accountable.\textsuperscript{133} In the long term, it will be important to maintain a thorough and effective inspection program that property managers can anticipate so they make home repairs proactively. An effective inspection program requires creating and maintaining a database to monitor and track inspections and hiring administrative staff to process data and communicate with landlords and inspectors. Programs can be designed so that the business licensing fees and fines associated with failed inspections cover much of the operating costs of the program.\textsuperscript{134} Because this program would not rely on general funds, it is slightly more financial feasible than other potential programs.

**Implementation Requirement: Requires Local Law Change**

SKC cities can implement and fund a proactive rental inspection program by passing a local ordinance, so long as it follows the restrictions imposed under state law.

\begin{itemize}
\item \textsuperscript{131} Displacement would be most likely to occur for very expensive repairs. There is very limited data with which to ascertain the number of extremely dilapidated units in need of these repairs. In the absence of this data, this analysis suggests that very expensive repairs are less common than moderately expensive repairs that do not lead to large percentage increase rent hikes.
\end{itemize}
Logic Model & Action Plan

To implement an inspection program, cities can take the following steps:

1. Identify peer city rental inspection policies that comply with state law and determine staff required to implement program (including database and administration, code enforcement, fee collection).
2. Design inspection program, including scoring criteria, and determine an allowable time period to require property owners to make repairs. Establish requirements for providing proof of inspection.
3. Adopt rental inspection program ordinance, including a business license requirement.
4. Communicate with the property owner community on the business license requirement for rental housing operations within city limits.
5. Begin inspecting units on a rolling basis with all units inspected within three years.

Program Examples & Variations

- **Los Angeles’s Systematic Code Enforcement Program (SCEP):** SCEP requires owners of properties with 2 or more occupied units to be inspected regularly. If a property does not pass inspection and does not provide a valid reason for non-compliance, the property owner must refund all inspection, re-inspection, and administrative costs to the city. Regarding the licensing fee, the program’s website states, “Property owners are charged $43.32 per unit, per year whether or not the units are inspected during that year.” Through this program, the City of Los Angeles inspected over 90 percent of the city's multifamily housing stock from 1998 to 2005, leading to approximately $1.3 billion in property owner reinvestment.

- **Durham’s Proactive Rental Inspection Program (PRIP):** One unique feature of the City of Durham’s program is that rather than inspecting units citywide, PRIP primarily inspects

---

135 As determined by the City of Los Angeles’s General Manager Hearing.
137 Ibid.
Within these areas, the city has created Priority Maps to identify neighborhoods most in need of inspection. Yearly licensing costs for multifamily properties with over 3 units is $400 (or $200 for licensed properties with 2 or fewer units).

Rehabilitation and Code Compliance Loans for Multi-Family Properties

As discussed above, even with appropriate building codes and active code enforcement, some landlords may still lack the resources to comply and make investments in their units. This may be especially true in properties that went unmaintained amid the Great Recession, during which property owners struggled with declining rents and rising vacancy rates that whittled away reserves for capital maintenance and improvement (see chart in Section 2.2 depicting vacancy and rental rates across the cities of Tukwila, Auburn, Kent, Renton, SeaTac and Federal Way). Some property owners likely also struggled with the tightening of credit that occurred in the aftermath of the financial crisis. Unable to access credit to make more expensive repairs, some lower-profit property owners likely deferred maintenance that may be manifesting itself in the form of even more costly repairs now. Furthermore, privately owned properties with fewer units that rent at prices at or below area median income often have “little or no reserves for capital maintenance and improvement” due to lower rents and generally larger per-unit maintenance costs. It may then be financially difficult for these owners to make the necessary improvements to comply with code.

Banks may also be skipping over the private owners of smaller multifamily complexes for loans due to cost economies. In an interview appearing in 2013 HUD “Evidence Matters,” the managing director of a real estate and mortgage finance advisory firm stated that,

“The same amount of energy will go into making a $5 million loan as will go into making a $500,000 loan. But banks charge for these services on a percentage basis. If I charge 1.0 percent, I make $5,000 on the smaller loan and $50,000 on the larger loan. If my cost of making the loan is $10,000 per loan, I lose money on the smaller loan and make money on the larger loan.”

145 Ibid.
To encourage and even enable multi-family property owners to bring their units up to city-mandated quality standards, particularly low-profit property owners and those renting their units to low-income occupants, this analysis recommends that SKC cities develop and offer a Rehabilitation and Code Compliance Loan Program for multifamily repairs.

**Description of Program**

A code compliance program would offer loans at or below market rate to multifamily property owners that rent at least a portion of their units at affordable prices to low-income households, to ensure that the program is maximizing its public benefit and reducing potential for displacement. The loans would be used specifically to assist with code compliance and/or rehabilitation projects. Cities would need to hire technical staff to administer the program, a job that includes reviewing applications and approving or rejecting them based on the appropriate financial considerations. However, to save money and direct it where it is needed most, this analysis recommends that cities offer loans only for code compliance and/or for landlords to which traditional banks may be unwilling to lend.

Example of eligibility requirements:

- Eligibility of units is restricted to households making 80% AMI or less (Central Minnesota Housing Partnership (CMHP))
- At least 51% of the property must be residential space (CMHP)
- Property must meet minimum financial feasibility and selection requirement (CMHP)
- Rehabilitation must address all rehab needs of the property, including those related to health: lead paint remediation, smoke detectors, electrical upgrades (CMHP)
- Code violations must be resolved (NYC Dept. of Housing Preservation and Development)

Some offer eligibility requirements for kinds of improvements that can be pursued:

- Roofing, insulation, siding, windows or doors
- Heating and air conditionings
- Plumbing and electrical
- Kitchen and bathroom remodeling
- Garage, carport and deck construction
- Attic and basement finishing

Loan terms can also be designed according to the property owners’ needs and access to funding (or lack thereof):
Central Minnesota Housing Partnership | Michigan State Housing Development Authority

<table>
<thead>
<tr>
<th>Central Minnesota Housing Partnership</th>
<th>Michigan State Housing Development Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to $25,000 per unit - $35,000 for Single Family / Duplex Units</td>
<td>Up to $25,000 for single-family rental property</td>
</tr>
<tr>
<td>Maximum loans ($300,000)</td>
<td>Up to $12,000 per unit for up to 5 multi-family rental units in buildings with 11 or fewer units</td>
</tr>
<tr>
<td>Term for 10 - 30 years based on loan amount</td>
<td>$60,000 max loan for multi-family project</td>
</tr>
<tr>
<td>Deferred payment, 0% construction loan</td>
<td>Competitive 8% interest rate</td>
</tr>
<tr>
<td>Non-recourse loan</td>
<td>Loan terms up to 20 years</td>
</tr>
<tr>
<td>Up to 25% loan forgiveness for qualified owners</td>
<td>Lien requirement for all landlord loans</td>
</tr>
<tr>
<td>Loan may be extended for continued affordability in lieu of repayment</td>
<td></td>
</tr>
</tbody>
</table>

While this program would likely have a high per unit cost, particularly for resource-constrained SKC cities, King County administers funds that can be dispersed for this purpose. Specifically, the County determines how to allocate about $7,000,000 in HOME and CDBG dollars each year through its CDBG and HOME Investment Partnership Consortium. The program has listed rehabilitation as an eligible expense in past years. The County also allocates funds through its Regional Affordable Housing Program (RAHP) specifically for rehabilitation (accomplished through inter-local agreements). Cities can lobby King County unilaterally or in partnership with other cities to ensure these funds are allocated to this type of program. In addition, cities could explore using bonding capacity to fund this need, rather than direct general fund revenues, since it funds a capital cost and the loan funds are expected to be returned to the city.

**Evaluation**

**Improves Health: Significant Health Improvements for Renters**

Rehabilitation and code compliance loans will have immediate, positive impacts on the health of renters, as units are brought into compliance and proactively renovated. Over time, more units will meet the new health and building standards. Homeowners will not benefit, however, if only multifamily building owners are eligible for the program.

---

Improvement of Existing Housing: *Improvements Will Be Made, though Limited by Size and Scale of Program*

Under this program, housing will improve at a swifter rate than in the current state as property owners take advantage of low-interest loans. However, the magnitude and scale of the improvement depends on the amount of funding available (see below in “financial feasibility” for more detail). The more money made available and loaned to building owners, the more properties will improve. Assuming an average loan amount of $5,000, twenty units will improve due to a yearly allocation of $100,000 for code compliance loans.

**Equity: Possible Displacement among Communities of Highest Need**

Low-income populations and people of color will be the greatest beneficiaries of this program as these folks are the most likely to live in substandard and unhealthy rental housing that requires repairs. Furthermore, the program can and should be designed to limit displacement by requiring that loan recipients maintain unit affordability. However, the program may result in some displacement if rehabilitation requires tenants to relocate and no relocation assistance ordinance is in place. Despite this, this analysis determines that the number of displaced residents will be far fewer than the number of low-income residents that will benefit from the program.

**Financial Feasibility: Significant Initial Costs, Savings down the Road**

A code compliance loan program would have an immediate and certain impact. But, in order to have a significant impact, the program will require a significant amount of funding. Size of the program depends entirely on how much money the cities decide to make available per unit and how many units they would like to serve. As in the example used in the “Improvement of Housing” section above, a target average loan of $5,000 and a program target of 20 units served would require a program budget of $100,000. However, these funds can revolve over time as landlords pay back their loans.

While the County administers funding to cities for rehabilitation purposes, it may be difficult to obtain an agreement from King County to funnel more of its scarce HOME and CDBG dollars into SKC rehabilitation projects. Furthermore, SKC cities may lack specialized staff to administer, review, and underwrite loans.

---

**Funding Sources:**

City-Led Funding Options
- City budget appropriations

Non-City Funding Options
- King County CDBG & HOME Funding
- Potential for state funding
Implementation Requirement: Requires Budget Allocation

If the city owns and operates the program, city councils would have to formally appropriate funds during the budget process. That fund appropriation would likely require Council legislative action to authorize and shape the program.

Logic Model & Action Plan

To implement a code compliance loan program, cities can take the following steps:

1. Determine staff time required to design, oversee and administer program, including its marketing.
2. Determine eligibility and affordability requirements for property owners interested in benefiting from the loans. Determine funding limits per unit (i.e. up to $5,000 per unit or up to $25,000 per unit).
3. Determine, authorize and allocate funding sources for the program. This can come from the current city general funds, from King County as a result of extra HOME or CDBG allocations, or other sources.
4. Market the program to intended audience.
5. Begin accepting and reviewing applications and disbursing loans.
6. Design and implement program accountability measures to enforce program requirements.
7. Collect loan payments from outstanding loans.

Program Examples and Variations

- **Central Minnesota Housing Partnership**: Prerequisites for multifamily properties to receive the loan include housing residents 80% AMI and below and demonstrating a comprehensive need for rehabilitation (lead paint removal, fire alarm installation, etc.).

- **Michigan State Housing Development Authority**: Through the Property Improvement Program for Landlords (PIP), both single-family and multifamily property owners can borrow at a competitive rate of 8.6610%.

---


5.3 Tenant Support Policies

The rental causal model discussed in Chapter 2 identifies a lack of legal protections for tenants as one cause of unhealthy housing. Specifically, tenants may continue to live in unhealthy housing and not report concerns to their property owner or city code enforcement for fear of being evicted. This section analyzes one way cities can add protections for renters with positive outcomes for both housing and health.

Just Cause Eviction Protection Ordinances

As described when evaluating current programs, the state's landlord-tenant law only nominally empowers tenants to take action against negligent landlords through its protection against retaliatory actions. The state assumes that an adverse action, such as an eviction, is retaliatory only if it occurs within 90 days of the tenant pursuing action against the landlord. Thus, a tenant must shoulder the costs of going to court, including court fees and time away from work, to prove a timeline for retaliation. And the tenant is still vulnerable to retaliatory eviction after the 90 days have passed. **By implementing and enforcing a just-cause eviction protection ordinance in a similar manner to Seattle, cities can more effectively empower renters to take action, by substantially deterring vengeful actions taken by landlords, while greatly limiting displacement.**

Description of Program

Seattle’s Department of Planning and Development (DPD) enforces the City’s Just Cause Eviction Ordinance. If a tenant is served a “termination of tenancy” without a listed “just cause,” or if the tenant wishes to dispute the “just cause,” the tenant contacts DPD with a complaint. DPD code compliance staff then investigates the complaint, and if the complaint is validated, code
enforcement staff instructs the landlord to rescind the termination of tenancy notice. If the landlord refuses to rescind the notice of termination, he or she will receive a “Notice of Violation” and the case will be referred to the City Attorney's Office. Furthermore, the City imposes steep fines on landlords found to have illegally terminated a tenancy. Landlords that acted illegally will be charged a “civil fine of $150.00 per day per housing unit from the date the violation begins for the first ten days of non-compliance and $500.00 per day per housing unit thereafter.”

Just Cause Eviction Ordinances (JCEO), like the one in place in Seattle, lay out a strict set of “just causes” for which a tenant can be served an eviction notice. Seattle’s ordinance lists 18 causes including overdue rent, planned major rehabilitation (contingent on the landlord obtaining a “tenant relocation license”), or building conversion into a “condominium or cooperative.” Outside of this list of causes, Seattle’s law prohibits landlords from evicting a tenant. Unlike state law, which only protects against retaliatory actions that occur within 90 days, a JCEO ordinance effectively protects against retaliatory action in perpetuity by making it illegal to serve an eviction without cause.

The ordinance and Seattle’s enforcement of it work to shift power back into the hands of renters, resulting in positive impacts for otherwise vulnerable renters. Seattle's action to immediately invalidate termination notices preempts actual eviction, as they do not wait until the tenant has already been evicted and displaced to take action. As a result, Seattle’s enforcement of JCEO greatly reduces possible displacements. Furthermore, JCEO enforcement eliminates the barriers faced by tenants elsewhere who are required to initiate the costly legal process and retain legal counsel. No longer deterred by the potential for retaliatory eviction and the expensive legal process, tenants are empowered to report problems – and seek resolution to them – with their units that they might otherwise have accepted to avoid a retaliatory eviction. These positive impacts are described in more detail below.

---


150 Ibid.

**Evaluation of Policy**

**Improved Health: Some Health Improvement for Renters**

A JCEO enforced in the manner described above will improve health among renters in two ways. First, newly empowered residents will more willingly report health and quality issues to their landlord. Unable to avoid resolving these issues by retaliating against the tenant, landlords will make the necessary improvements or face penalties applied by the cities for failing to comply with code. Second, property owners will begin to act proactively to maintain their dwellings knowing that they can no longer avoid maintenance by intimidating tenants.

However, it is unclear just how many units and residents will benefit. The true impact depends on the extent to which cities enforce the ordinance and to what extent tenants know and truly believe they will be protected from eviction under the new ordinance. Assuming the ordinance is enforced as described above, significant health improvements will result.

**Improvement of Existing Housing: Some Improvements to Quality of Existing Housing**

A JCEO will improve housing in two ways. First, since renters will more willingly submit complaints of unit health and quality issues, housing will improve insofar as code enforcement staff is more aware of housing quality concerns requiring enforcement. As a result, code enforcement staff will reactively require landlords to address significant health and quality issues.

Second, landlords will likely be more willingly to proactively maintain their units when stripped of the ability to defer maintenance by quieting complaints through intimidation. Thus, a JCEO will improve upon the extent to which housing is improved, relative to current policy.

**Equity: Significant Benefits for Low-Income Populations, Including Reduced Displacement**

Low-income families, who are more likely to live in unhealthy and substandard conditions and who are the most vulnerable to the adverse consequences of eviction (such as the costs related to moving and relocating to areas that increase their commute times and costs), will experience the greatest benefits under a JCEO ordinance.
JCEOs are intended to benefit residents in the most dire rental housing conditions. As described in the above two goals, these newly empowered tenants will more willingly and frequently report problems which code enforcement staff would require landlords to address or otherwise face penalties or even legal action by the cities. This is especially true in contrast to the current conditions under the State Landlord-Tenant Act. The Act deters the lowest income individuals from taking legal action because they can least afford the costly legal process required to prove that an eviction was retaliatory. Seattle’s enforcement of JCEO eliminates these costs by invalidating termination notices without having to go to court.

Under Seattle’s enforcement of the ordinance, perhaps its most positive impact for low income individuals is its ability to limit displacement caused by evictions. The chart at right depicts all JCEO violations since the policy was enacted. 152

Each "violation" essentially denotes an instance of displacement avoidance. As a "violation" means the City found a landlord to have issued an invalid termination notice, each violation means that the city took action to ensure that a resident was not unjustly evicted and displaced. As a result, an enforced JCEO is likely to have very beneficial impacts on the health of low-income renters and displacement avoidance.

Financial Feasibility: Potentially Expensive Enforcement Costs

The most substantial costs related to a JCEO involve enforcement of the new protections. Enforcement of a JCEO will require code enforcement and city attorney staff time in cases where the landlord refuses to improve his or her unit or tries to fight an overturned eviction, for instance. SKC cities technically do have existing staff in these roles, but the City may need to hire new employees to keep up with enforcement and administrative activities especially as landlords are first adjusting to the new law. As briefly described above, the program will likely yield long-term efficiencies as

landlords modify their behavior to reflect their understanding that they can no longer intimidate tenants, and the city will likely be required to respond to fewer complaints over time.

**Implementation Requirements:** *Requires Passage of New City Ordinance*

Cities would have to pass a new law to enact a JCEO and would likely face strong opposition from property managers and property owners in the area. See Appendix C for further detail.

**Logic Model & Action Plan**

We recommend cities approach implementation of a Just Cause Eviction Ordinance with the following action plan:

1. Create a political strategy to garner support from property owners, including opportunities for public discourse and addressing the inherent benefit of increasing tenant reporting of housing conditions.
2. Pass city law change for a Just Cause Eviction Ordinance.
3. Hire or train any new staff that might be required to enforce the law.
4. Distribute marketing materials and hold public meetings to inform renters and landlords of what the law means and how it impacts both parties. Inform renters and landlords of any new processes related to the ordinance, such as new mechanisms through which to lodge complaints.
5. Enforce the law, which includes overturning or upholding evictions.

**Program Examples and Variations**

- **City of Seattle’s Just Cause Eviction Ordinance:** As described above, Seattle’s JCEO protects renters and is actively enforced by the local Department of Planning and Development. It actively shifts the power from landlords to tenants by setting out a specified and limited list of just causes for evictions.

**5.4 Additional Local Capacity**

Cities in South King County are, like many cities, constrained in the amount of resources they can direct to any given problem. As this report is premised on an understanding that unhealthy housing
is of regional concern, there are opportunities for SKC cities to work together to implement cross-jurisdictional solutions in a way that leverages limited local resources. This section examines one way SKC cities can work together to positively influence housing and health. While this section does not align with a particular part of the causal model, it would provide a direct route to achieving the overriding goals of affordability and improvement of the current housing stock.

### Regional Acquisition Fund

SKC cities face many similar unhealthy housing problems in their communities – delinquent landlords, pockets of concentrated dilapidation, and persistent substandard conditions in both the rental and ownership markets. As discussed in Chapter 2, some landlords will consistently choose to rent units to higher income tenants or at rates that low-income families must stretch to afford while choosing not to maintain high quality units. One of the most direct strategies for attaining both affordability and quality is through the acquisition and preservation of buildings by non-profit affordable housing developers. This analysis recommends that SKC cities work together to operate a regional acquisition fund to provide financing for the acquisition and rehabilitation of affordable housing.

**Description of Program**

An acquisition fund would finance the permanent or long-term preservation of affordable homes in SKC. Funding could be used for multifamily acquisition and rehabilitation or, depending on the fund’s goals, for the acquisition of single-family homes in close proximity to one another to achieve rehabilitation and resale to local community members. For both multifamily and single-family projects, non-profit developers would be the primary recipients of acquisition funds. Funding acquisition and rehabilitation by non-profits, as compared to private property owners, ensures that newly rehabilitated or improved healthy housing will remain permanently affordable and better promotes the goal of serving low-income families (the agencies’ missions) rather than profit maximization.

A regional acquisition fund would allow cities to leverage their individual capacity to fund affordable housing across jurisdictional boundaries to achieve greater results and efficiencies. Such a fund in SKC would function similarly to East King County’s model, the ARCH (A Regional Coalition for Housing) housing trust fund, wherein member cities provide funding for affordable housing investments either through their general fund or by allocating a portion of their CDBG funding.  

similar SKC fund, however, should focus on local priority activities that support preservation and healthy housing rather than funding new affordable housing projects, reflecting the needs identified by the SKC stakeholders we interviewed. While the acquisition fund could be administered by a single city (or through new staff entirely), the benefits would be spread across all contributors as housing problems and residents don’t end at a city’s borders. The direct benefits would be seen in the locations where buildings were acquired and rehabilitated.

**Evaluation of Program**

**Improves Health: Modest Health Benefits for Residents Who Return to Rehabilitated Units**

Both renters and homeowners stand to benefit from an acquisition fund depending on the fund’s priorities, as unhealthy housing is rehabilitated in both markets. Because some rehabilitation projects require tenants to relocate for at least a period of time, health benefits may not necessarily accrue to all current residents of a particular building (see discussion of equity and displacement below). However, for new residents or those residents that do return, preservation and rehabilitation projects that are designed to increase health outcomes have proven effective at doing so, such as occurred with the rehabilitation of public housing projects in Viking Terrace, Minnesota. In order to gain the greatest health benefits, the acquisition fund should focus on supporting acquisition of buildings with the most egregious code enforcement or condition problems or where residents are most at-risk of displacement if conditions are improved.

**Improves Existing Housing: Significant and Certain Improvement of Existing Housing**

The main purpose of the acquisition fund would be to improve the existing stock of housing, while maintaining affordability for low-income residents in the community. The extent to which this can be accomplished depends on funding levels, yet there is a potential for great impact when funds are leveraged across other local, state and federal funding sources. While the effects of an acquisition fund on housing quality would be targeted and impactful, they would not be seen for many years, after rehabilitation projects have been financed and acquired and rehabilitation is complete.

---

Equity: Benefits Vulnerable Populations and Ensures Long-Term Affordability

Communities of color and low-income households stand to benefit from a well-funded acquisition fund, as they are most likely to face challenges in finding affordable housing and to be currently suffering from unhealthy housing. The fund would contribute to preservation of affordability in SKC. Funds for acquisition and preservation should be contingent on serving low-income households, with a requirement that non-profit builders adhere to healthy housing standards.

There are key long-term benefits to providing public subsidies for permanent acquisition and rehabilitation. First, the mission-driven non-profit agencies who rehabilitate and own the housing will keep prices affordable for low-income tenants, as opposed to property owners in the private market who will expect a return on their investment and set rents as high as the market will bear. Second, while displacement of existing residents can occur during building renovation, there is considerable leeway to minimize displacement when a non-profit manages the rehabilitation. For instance, when Mercy Housing Northwest (MHNW) rehabilitated the Appian Way apartments in Kent, negative displacement impacts on tenants were mitigated by surveying the incomes of the residents to determine how to best structure income set-asides and rehabilitating a set of multifamily buildings one at a time. This process minimized the number of times a tenant had to move. MHNW also provided a relocation benefit to residents, many of whom returned to their old unit but with a lower rent.\textsuperscript{155}

Financial Feasibility: Costly for Individual Cities but Effective at Regional Level

A regional housing acquisition fund would be an expensive investment relative to other options that SKC could use to improve unhealthy housing. However, rehabilitation can be a cost-effective approach to providing quality housing, in some cases costing less than new construction, over time.\textsuperscript{156} Creating an acquisition fund regionally, instead of within individual cities, will add even more cost efficiencies, enable the fund to have more dollars available for attractive opportunities for rehabilitation, and reduce staff expenses.

\hspace{1cm}

\hspace{1cm}

\textsuperscript{155} Email correspondence with Mercy Housing Northwest. June 4\textsuperscript{th}, 2015.
While SKC cities may be hesitant to shift funding from current uses to this purpose, an acquisition fund could be set up as a revolving loan fund that could return money over years, when funding is received from other sources. Additionally, since an acquisition fund can be scaled and can increase to include more projects as additional funding becomes available, a fund could be started with a relatively small allocation. Finally, by pooling a significant amount of resources to leverage other funding sources, SKC cities can earn a “seat at the table” in public, housing finance decisions, a significant benefit that will ensure other funders address SKC’s priorities.157

**Implementation Requirement: Ongoing Local Budget Allocations**

A regional acquisition fund requires budget allocations from individual SKC cities. It may be politically challenging at first, particularly to identify a funding source. However, if the program gains some early wins by clearly and significantly improving an identified problem, the fund can gain political will and achieve success.

**Logic Model & Action Plan**

To develop a regional acquisition fund we recommend taking the following steps:

1. Convene a working group with members from all SKC cities to develop explicit goals and activities for a regional fund. We recommend cities include other local non-profit developers during this process to gauge capacity and interest of development partners.
2. Forecast expected long-term local contributions, expected local housing benefits for each city, and the staff capacity required to operate the fund. Develop and execute inter-local agreements and/or a memorandum of understanding between jurisdictions regarding governance of the fund and regional coalition.158
3. Allocate funds.
4. Solicit proposals from non-profit developers.
5. Begin operation of the fund. Begin allocating funds to non-profit developers to begin acquisition and rehabilitation of housing.

157 Per Kelly Rider, Housing Development Consortium of Seattle King County.
158 Ibid.
Program Examples and Variations

- **HEART**: The Housing Endowment and Regional Trust (HEART) of San Mateo County operates a revolving loan fund that invests in local affordable housing projects. HEART is a public-private partnership and could be mirrored to include relevant healthy housing stakeholders. Currently, HEART has raised funds from local banks, private corporations including Comcast and Genentech, as well as from county and state agencies. 159

- **ARCH**: This model provides a local example of how collaboration can yield efficiencies and great outcomes. This fund focuses on funding new affordable housing construction but also does fund preservation and rehabilitation. The ARCH staff also advises cities on housing issues and policymaking. 160

5.5 Synergy of Solutions

While all of the programs and policies recommended in this chapter are valuable independently, many of these strategies function more effectively when implemented concurrently. In so doing, cities can combine efforts that combat unhealthy housing conditions across programs and policies and affect multiple causes of healthy housing problems. Table 6, on the following page, illustrates and describes how five of the six policies specifically complement each other by addressing “gaps” or “limitations if used in isolation.” This discussion is followed by a flow chart depicting the interaction between the options.

Updated building codes to the National Healthy Housing Standard, rental inspection programs, and Just Cause Eviction Ordinances work harmoniously with each other to enhance results. As building codes are only as strong as their enforcement, implementing a rental inspection program in tandem with the NHHS effectively holds all rental property owners accountable and enforces greater overall compliance to a higher overall standard. However, inspections are limited to once in a 3-4 year cycle. In between inspections, community health workers help identify conditions that need remediation in between inspections and encourage tenants to report these issues to their landlords and/or local code enforcement. Some tenants will not do so for fear of retaliatory eviction. In response to this problem, a JCEO ensures that tenants can report healthy housing problems without this fear. Newly empowered by protections to report issues to their landlord and, if necessary, the city, more issues are resolved and more building units in the city are improved.

Code compliance loans and the acquisition fund also complement the adoption of more stringent building codes and rental inspection programs. An inspection program requires absentee landlords to confront code requirements rather than simply avoid the cost of repair. Other landlords and property owners will simply be unable to afford the cost of making the improvements required to

comply with code. By helping low-margin property owners afford potentially expensive repairs and maintenance, the code compliance loan program makes it more likely that landlords will pursue repairs after inspection rather than sell their property to another for-profit developer, which places the affordability of these units at risk from redevelopment. Finally, the regional acquisition fund helps preserve affordability in properties that are sold by providing early financing to nonprofit developers to acquire the property and maintain its long-term affordability through redevelopment or rehabilitation.

<table>
<thead>
<tr>
<th>Table 6: Policy Limitations &amp; Solutions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy</td>
</tr>
<tr>
<td>Building codes are mere tokens without enforcement.</td>
</tr>
<tr>
<td>Some property owners of non-compliant properties lack the resources with which to bring units up to code.</td>
</tr>
<tr>
<td>Units in between 3-4 year inspection cycles may avoid maintenance by evicting restive tenants that ask for repairs.</td>
</tr>
<tr>
<td>Low-margin property owners will lack financial capacity to make repairs and may avoid doing so.</td>
</tr>
<tr>
<td>Lack of incentives and/or motivation by property owners limits applications for financing and related repairs.</td>
</tr>
<tr>
<td>CHWs will only identify environmental concerns in homes that require substantial repairs not make the repairs.</td>
</tr>
</tbody>
</table>
Figure 3: Diagram of the connections between the recommended best practices

Acquisition fund provides early financing to acquire properties that may otherwise sell to the private market under burden of code compliance costs, losing affordability

Code compliance loans offered to assist and encourage compliance

JCEO results in (1) more code compliant units by empowering tenants to report issues that, once known, city code enforcement officials can ensure are complied with.

JCEO results in (2) more proactive maintenance as landlords no longer can avoid improvements by limiting tenant reporting through intimidation, thereby keeping the issues unknown to code enforcement.

Maintenance avoided on some units in between 3-4 inspection cycle by dissuading tenants from reporting conditions through intimidation & threat of retaliatory action

Some property owners unable to afford cost of bringing unit up to code

BCs enforced by Proactive Rental Inspection Programs

Community Health Workers identify environmental concerns in homes & encourage tenants to report issues

Building Codes
CHAPTER 6: IMPLEMENTATION SUGGESTIONS — A REGIONAL HOUSING PARTNERSHIP

The discussion of “synergy” in section 5.5 of this report reveals that all of the recommended best practices complement each other such that their simultaneous implementation will reap greater health, housing quality and equity impacts for SKC residents. This chapter suggests strategies for implementing Chapter 5’s best practices that will yield greater efficiencies and, thus, greater impact.

Although all of the recommended best practices discussed in Chapter 5 can be implemented locally and as standalone policies (except the regional acquisition fund), we suggest that several of these options can and should be implemented regionally to be most effective, while others derive the greatest benefits through local implementation. This section of the report offers suggestions for how SKC cities can implement various options described in Chapter 5 to most effectively address issues of health and housing quality in their jurisdictions by capitalizing on synergies between policies and taking advantage of opportunities for cross-city and cross-sector collaboration.

First, three best practices should be implemented at the local level:

- Adopting the National Healthy Housing Standard
- Implementing Proactive Rental Inspection Programs
- Enacting Just Cause Eviction Ordinances

Second, SKC should form a regional housing partnership to implement the remainder of Chapter 5’s best practices. Such a partnership can help pool scarce resources and leverage them most efficiently into high-priority rehabilitation and preservation projects, while helping to provide the cities with a consolidated and stronger voice to help ensure scarce King County housing dollars are better addressing local healthy housing priorities. The programs that can be implemented through this partnership include:

- Code Compliance Loans for Multifamily Repairs
- Regional Acquisition Fund
- Regional Community Health Worker Program

Third, we conclude this chapter by discussing the importance of healthy housing referrals. As discussed in Chapter 2, current programs could benefit from deeper collaboration and working to link together new and existing programs operating in SKC – including the medical system, city and county home repair programs, and local code enforcement inspection activities – can have a greater impact on resident health and housing quality. Referrals are an all-encompassing regional strategy
rooted in a need for collaboration that builds on several different policies and programs, but this is not itself a program. The benefits of referrals originate at the level of individual programs and not necessarily from a coordinating entity, and therefore this is not discussed in Chapter 5 with standalone programs.

6.1 Local Policies: Ensuring a Strong Foundation

In order to effectively address the complex causes of unhealthy housing, local SKC cities must enact local policies and adopt enforcement procedures that raise standards and regulatory requirements in the rental market. Updating local building codes to include the NHHS and enforcing these new standards with rental inspection programs ensures that there is a foundation for the region to identify housing quality issues. Additionally, enacting and enforcing JCEOs helps to level the playing field for renters while preempting their displacement as a result of eviction. JCEOs and rental inspection programs both work to hold property owners accountable to certain health and quality standards.

Establishing this strong foundation at the local level increases the overall effectiveness of the other policies and programs, discussed below, which should be implemented regionally. For instance, rental inspection programs can assist in identifying problem properties that could benefit from a new code compliance loan program or direct acquisition and rehabilitation. The adoption of higher building standards also ensures that rehabilitation and repairs are completed to a healthy and sustainable standard, contributing to the longevity of the program.

6.2 A Regional Housing Partnership

We suggest that South King County cities form a Regional Housing Partnership to accomplish three main objectives:

- Pool and steer local funds into large-scale rehabilitation and preservation projects through a regional acquisition fund and administer a code compliance loan program. This results in greater regional impact at lower administrative cost to each individual city.
- Operate or fund a CHW program. Depending on local capacity, the regional partnership can operate a CHW program or manage grants to another organization, such as a local non-profit, to deliver CHW services.
- Create a stronger, united voice of SKC cities in the process that decides how King County housing dollars will be allocated, resulting in external dollars more effectively addressing local SKC priorities.

This entity would act as a partnership between incorporated SKC cities, and could even include unincorporated areas such as Skyway or White Center, that manages and administers regional programs. Implementing these programs regionally allows the cities to capture important economics of scale through lower overall staffing costs. Furthermore, the effectiveness and impact
will only grow as it receives greater support from a larger number of municipalities. Finally, regionally approaching health problems like asthma, for instance, can help entice large institutional investments like social impact bonds to fund a regional, evidence-based community health worker program. The benefits of a regional partnership are discussed in full below.

**Economies of Scale**
Administration of an acquisition fund and code compliance loans, in particular, require a level of expertise, staff time and financial resources that lie beyond the current capabilities of individual SKC cities. Specifically,

- Cities lack the technical staff and expertise needed to manage, coordinate and administer these funds and loans. Rather than having each city hire its own dedicated staff, the cities could save by sharing the cost of hiring a single set of staff.
- Cities individually lack the seven figures needed to operate an impactful acquisition fund. Similarly, SKC cities individually lack the type of funding required to operate a code compliance program capable of serving five-figure loans to dozens of property owners in need. However, smaller allocations made by multiple cities could create a reasonably sized pool of funds.

**Regional Solution to a Regional Problem**
Unhealthy housing conditions are not confined to any one area and neither are the solutions. Treating the healthy housing problem as a regional one is important, and a regional housing partnership begins the process of addressing it in a collaborative way. Addressing housing issues together, with a recognition of common impediments, can help move King County and other entities to focus work in the area on rehabilitation of existing housing stock.

Furthermore, by acting regionally, cities have a greater potential to attract large sums of institutional investment through a social impact bond model, which could be used to fund community health workers. (See Appendix B for additional detail on social impact bond financing.) Community health worker programs meet many of the common requirements for social impact bond financing. However, to better attract substantial institutional investment in a pay for success social impact bond model, benefits must be spread to a large number of people.\(^{161}\) By acting regionally, a regional housing partnership has the potential to attract investment to fund an evidence-based community health worker program at little or no cost to the public.

**A Seat at the Table**
Pooling resources has the benefit of contributing to the creation of a common vision for SKC and increasing the ability to influence the direction of King County housing dollars. Interviews

\(^{161}\) See the example of HEART, discussed as a program example for a Regional Acquisition Fund, and the ability of that organization to attack external financing.
conducted in order to complete this report yielded multiple instances where city officials expressed a desire to have a stronger say in regional housing decisions. Forming and funding a new regional entity begins the process of getting SKC a seat at the table.162

It should be noted that a regional housing partnership requires support from local cities to be effective. A similar model was proposed in the 1990s, but failed to get off the ground. One report has attributed the failure to a “lack of a clear mandate and work plan for the staff position” and a lack of “a broad base of support.”163 To overcome these prior obstacles, a renewed local effort requires broad political will to address the problem of unhealthy housing as well as explicit goals and expected benefits to individual cities, recognizing their diverse needs.

6.3 Collaboration and Referrals

As discussed in Chapter 3, a number of programs in both the public and non-profit sectors already exist to address unhealthy housing needs in SKC. As cities look to expand their efforts to address unhealthy housing, we suggest that the region work to ensure that these programs are working together more effectively. A referral network would allow the region to better align healthy housing programs in mutually beneficial ways by encouraging programs to coordinate. Thus, a referral network is not in and of itself a program to be implemented in isolation; rather, it is a method of implementation that acts as the “glue” between existing programs and some of the best practices identified in Chapter 5.

Referrals are a powerful mechanism for organizations to link families suffering from the effects of unhealthy housing to other helpful programs. The ad-hoc referral system between the Tenants Union and the American Lung Association is one current example of this. Potential referral partners include local school districts, healthcare providers (both hospitals and primary care providers), home repair programs, in-home assessment and community health workers, tenant resource providers such as the Tenants Union, and agencies or community members who could provide information on available tax credits and incentives for healthy home repairs. Because residents in one SKC city do not only utilize services in their home city, a regional referral network helps to connect residents to all resources serving the area.

In a referral network, hospitals or other medical service providers serve as the first point of contact for those suffering from adverse health conditions. After diagnosing these negative health outcomes

162 Per Kelly Rider, Housing Development Consortium.
as a byproduct of dwelling in unhealthy housing, this institution would then refer the individual to a program such as a community health worker, home repair, or code enforcement program. Through these avenues, the resident would then have greater information and access to achieving healthier housing. If the resident dwells in a multifamily property whose owner cannot afford the necessary repairs, this owner may become eligible for a code compliance loan.

**Referrals and Multi-Sector Interventions**

Referral networks bring benefits through both improving health outcomes and increasing equity for low-income and vulnerable populations.

*First,* referrals increase the number of contacts across sectors and between affected families and available programs, bringing health benefits for both renters and homeowners alike. There is evidence to support such multi-intervention solutions. For example, a federally-funded pilot program run by the King County Housing Authority used referrals from a local school district to link households to weatherization and community health worker interventions. Households that received both services saw greater health improvements than households that received only community health worker visits.164 Here, the referral occurs at the program level and is not coordinated by a new entity.

*Second,* referrals increase the opportunities for vulnerable populations, such as immigrants and the disabled, to connect with programs that they otherwise would not encounter. With this implementation strategy, an immigrant family who never would have found out about a home repair program would be referred to the program by a local community health worker or by a healthy home assessment program. In this way, cross-program coordination helps to address a current problem with existing programs, in that benefits of home repair programs are often not evenly distributed across all demographic groups.165

While there are clear benefits to encouraging proactive referrals between existing programs, some residents in need will run into inevitable situations where there is a lack of funding or a long waitlist for referred services. For instance, a single-family homeowner referred to the King County Housing Authority for weatherization services might encounter a long waitlist. Referrals, particularly with a strong data/monitoring component, may help quantify the need for new dedicated funding to support currently available services and recommended new programs. This


165 Per in-person interview with King County staff member.
will help promote desired healthy outcomes and the capacity required to implement needed services.

**Referrals in Action**
While many pilot programs have been initiated locally premised on referrals from either a hospital or a school,\(^{166}\) there are fewer examples of lasting local referral networks. Boston’s Breathe Easy at Home program provides one example. This program tracks referrals between medical providers and city agencies to ensure that follow-up improvements are made. It uses a shared website wherein “doctors, nurses or other health professionals can refer patients with asthma for housing inspections if they suspect substandard housing conditions may be triggering a child’s asthma in their home.”\(^{167}\) In this case, local code enforcement is linked with the health sector in a mutually beneficial way. If SKC cities implement the best practices recommended in Chapter 5, there would be numerous opportunities to link new programs together with already established programs.

---

\(^{166}\) See King County Public Health Healthy Homes Pilots I and II, and King County Housing Authority’s Weatherization and Community Health Worker intervention.

CHAPTER 7: CONCLUSION AND SUGGESTIONS FOR FUTURE RESEARCH

This report has discussed unhealthy housing and the causes of it in South King County and also recommended a set of best practices to address this ongoing problem. In both the rental and homeownership markets, unhealthy housing conditions lead to negative health outcomes, large resident expenses, and dilapidation. Further, the issue of unhealthy housing disproportionately harms low-income residents, who often do not have the ability to repair their homes. Therefore, SKC cities must be proactive in their commitment to improve the quality of housing – and thus the quality of life – for their residents.

There are many policies and programs SKC can implement to improve both the quality of homes and the health of residents as a result of their housing. This report analyzed and recommended six best practices for local cities and the larger region to pursue:

- **Community Health Workers.** Community health workers will help educate residents about health outcomes from housing conditions and connect them to the appropriate programs and resources necessary to improve their homes.
- **National Healthy Housing Standard.** Updated city building codes that reflect more healthy housing goals will have a direct effect on housing improvements when paired with proactive code enforcement.
- **Proactive Rental Inspection.** Rental inspections programs that assess the condition of rental units and actively enforce health codes will have a positive effect on both multi-family housing repairs and tenants’ health.
- **Just-Cause Eviction.** Through creating a new city ordinance, cities will provide displacement protections to tenants who may otherwise face retaliatory eviction. This approach would promote tenant reporting of rental housing health issues.
- **Code Compliance Loans for Multifamily Repairs.** Low-interest loans will ensure low-margin property owners can afford make the repairs necessary to bring units up to code without redevelopment.
- **Regional Acquisition Fund.** By pooling together resources, information, and funds, South King County cities can purchase and rehabilitate dilapidated, affordable multifamily properties. This will maintain and improve the number of affordable homes across the entire region, and all cities will benefit.

Many of the solutions listed above address different, but equally important, causes of unhealthy housing in SKC. As a result, while any one of these options can make a significant impact on their own, the net impact will dramatically increase if multiple solutions are implemented concurrently as discussed in section 5.5 and in Chapter 6.
Under a **regional housing partnership**, cities can stretch this impact across the entire region through code compliance loans, an acquisition fund, and a referral network. Moreover, through additional collaboration that emphasizes referrals, cities can identify families most in need of healthy home improvements and connect them to community health workers and other existing programs.

### 7.1 For Future Research

Our research and conversation with South King County cities revealed several avenues for future research that fell outside the scope of our work. These are problems that the Housing Development Consortium, the cities themselves or future analysts should consider.

**Tenant Relocation Assistance**

Tenant relocation assistance (TRA) requirements for landlords seeking to sell, convert or rehabilitate their units are critically important for ensuring that low-income residents are not displaced with nowhere to go. Furthermore, TRAs are important behavior modifiers. They add significant costs to landlords that defer maintenance for years and now require that current tenants move out so that expensive repairs can be made. They can also cut into the profitability of simply “flipping” a dilapidated unit to a buyer intent on demolishing and redeveloping the property. In this way, TRAs might work to encourage more proactive maintenance and repairs while discouraging decisions that can lead to wide-scale displacement.

TRA requirements came up many times in our research. We did not include formal discussion of TRAs, however, because we simply did not have the time to do so.

**Mass Foreclosures & Vacant Property**

Several cities expressed concern about large swaths of foreclosed and vacant properties within their jurisdictions. Cities in other regions hit especially hard by the recession’s housing crisis have developed innovative strategies to address this nuanced problem.

- The use of *social impact bonds* to purchase and reclaim foreclosed and/or vacant property, rehabilitate it, and sell the property to a new homeowner can deliver a positive return to the project’s investor(s). This can also include the role of *land banks* in property acquisition, rehabilitation, and sale. The Detroit Land Bank is a leading example.
- The intersection between land banking and land trusts or other ways of preserving affordability for current residents should also be explored.

**Concentrated Dilapidation**

Related to mass foreclosures and vacant properties, some neighborhoods in SKC have fallen into blight. The concentration of dilapidated properties increases the risk of fire, attracts graffiti and
other criminal activity, and mars the community and regional perceptions of it. Some tools to consider include:

- Use of the Community Renewal Law to leverage otherwise inaccessible funding streams.
- Upzoning in these areas to increase the value and productivity of the land.

However, these tools should be used in conjunction with anti-displacement strategies, as both of these criteria can lead to higher cost housing replacing current housing affordable to low-income households.

**Dilapidated and Unhealthy Mobile Homes**

Nearly all SKC cities struggle to address the needs of worn out manufactured home communities. Future researchers and policy analysts should consider tools, incentives, and other strategies that result either in the rehabilitation of unhealthy manufactured homes or in redevelopment of the land while preserving affordability.¹⁶⁸

**Hoarding**

Many city officials also expressed concern with the problem of hoarding, and its health risks, in their communities. Hoarding is a unique problem that falls outside the reach of many regulations and incentives. We recommend that future researchers take a specific look at strategies that can be used to address health and structural issues without displacing the occupant.

¹⁶⁸ Furman, M. Eradicating Substandard Manufactured Homes: Replacement Programs as a Strategy. 2014.  
APPENDIX A: ADDITIONAL STRATEGIES FOR ADDRESSING UNHEALTHY HOUSING

As part of a process to determine Chapter 5’s set of recommended best practices, the authors of this report explored other alternative strategies that could be implemented to improve healthy housing. This appendix provides brief descriptions and evaluations of these four programs, some of which will be familiar to SKC cities:

- Multi-Family Property Tax Exemption for Rehabilitation
- Increasing Home Repair and Weatherization Funding
- Occupant Education Programs
- Homeowner Property Tax Incentives

While these programs are worthy of discussion in determining how to best improve health and housing, they were excluded based on a few criteria, as discussed within each option. Two of the below options were excluded from Chapter 5 based on their implementation requirement—a state policy change. Additionally, some programs, such as occupant education and home repair programs, are either currently in place in SKC or do not promote equitable outcomes. Given this, implementation or expansion of the below programs will be less likely to improve health and housing relative to our selected strategies.

Because these programs are not recommended as best practices, the below descriptions and evaluations do not contain action plans, logic models or program examples as present in Chapter 5.

**Multifamily Rehabilitation Property Tax Exemption for Rehabilitation**

As discussed in Chapter 2, multifamily property owners often lack the necessary regulatory and financial incentives to maintain the quality of their buildings. Interaction between low profits and a ceiling on potential rents in SKC means that the return on investment for property owners is not sufficient to warrant major reinvestment in a unit. *To better incentivize rehabilitation of aging, poor quality multifamily buildings, SKC cities can pursue a multifamily property tax exemption (MFTE) that makes rehabilitations more financially feasible.*

This report did not select this option as one of the recommended best practices for the following reasons:

- **State Law Change:** The existing MFTE program allowable under state law is not designed for use in rehabilitation projects that do not involve a vacant building. Therefore, for SKC cities to offer an effective rehabilitation MFTE program to property owners, they would need to advocate for a change to state law, a strategy with uncertain outcomes.
• **Lengthy Implementation:** In addition to pursuing a state law change, which might take multiple years, there would be additional lead-time before property owners take advantage of the exemption.

**Description of Program**
For private multifamily property owners, property tax exemptions are one mechanism to incentivize rehabilitation. Under existing law, cities have the authority to authorize multi-family tax exemptions for new housing and for the rehabilitation of vacant, run-down buildings when they set aside units for affordable housing. To qualify for the latter rehabilitation provision, existing buildings must be completely vacant for at least one year.\(^{169}\) As a result, even in jurisdictions with MFTE provisions, rehabilitations are rarely eligible for this tax exemption.\(^{170}\) Indeed, the provision was not designed for rehabilitation in high-demand, low vacancy markets. Amending the state law, to tailor the MFTE provision so that it is more suited for rehabilitation of existing multifamily buildings, would provide another tool for SKC cities to attract reinvestment by private property owners. An MFTE provision for multifamily rehabilitation would ideally include the following provisions:

- No requirement that units be vacant, as long as the MFTE is implemented alongside a tenant relocation assistance program, to mitigate any displacement.
- A lower cap on rehabilitation cost per unit to allow for smaller scale repairs.
- Elimination of the opt-out affordability provision.
- A structure that limits fiscal impacts on local cities (see below).

By offering a property tax incentive to rehabilitate properties up to high standards of health, property owners will reinvest in their units in order to increase their long-term revenue outlook. This tax benefit will need to be large enough that property owners will want to take advantage of it but not too large that it discourages regular housing maintenance without a tax benefit.

Since MFTE programs are voluntary, they do not guarantee rehabilitation or repairs will take place; it will take some time for landlords to become informed and participate in this program, and some will ultimately never participate. However, with a proper tax benefit structure, this program can encourage more property owners to improve their rental properties.

This MFTE program would need to be carefully structured to ensure cities do not lose too significant a portion of current revenues. Cities could assure this by exempting only the added value of the building from property taxes and not the current value. This would be valuable to landlords by allowing them to hold the value of their property, and therefore taxes owed, steady over time.

\(^{170}\) Tacoma and Seattle MFTE evaluation from auditor’s office.
Evaluation of Program

Improves Health: Improved Health Dependent on Program Participation

Once amended by state law and enacted by local SKC cities, a preservation MFTE program would specifically target rehabilitation of multifamily buildings, allowing tax exemptions for repairs that improve the health of their residents. As Chapter 1 illustrates, poor living conditions can have a detrimental impact on health. Health benefits will accrue to those residents living in the selection of multifamily properties that take advantage of the new MFTE program.

Improves Existing Housing: Uncertainty Regarding Magnitude of Impact

An MFTE program designed for preservation and rehabilitation would target improvement of existing housing explicitly, rather than creating new housing (although MFTE programs can be used for this purpose under existing law). The degree to which an MFTE program will improve existing conditions is ultimately dependent on whether the mixture of affordability requirements and the amount of the tax exemption is sufficiently enticing for private property owners. Additional research and discussions with the development community will be required to ensure a new program will be effective.

Equity: Preserves Affordable Housing but with Risk of Displacement

An MFTE program tailored to SKC housing rehabilitation needs would include affordability provisions and therefore contribute to the preservation of the region’s affordable housing stock. Acting on its own, and without proper protections included in the statute change, there is a risk of displacement for residents in properties that take advantage of an MFTE provision. Most repairs covered by this provision cannot be completed while tenants occupy units, and thus would necessitate some displacement. Depending on the type of rehabilitation project, developers can plan for and mitigate displacement (see discussion of Mercy Housing’s Appian Way rehabilitation project in Section 5.3). However, a for-profit property owner may be less inclined to design a project with limiting displacement in mind – which speaks again to the importance of tenant relocation assistance policies as well as programmatic protections in statute.
Financial Feasibility: Limited Impact on Local Tax Revenues

MFTE programs enacted in other cities in Washington State have had minimal effects on overall property tax revenues. Because the current program only exempts added value of new construction and not the value of land, it does not impact current tax revenues and only limits growth of revenues. If the new program was structured to similarly hold current land value constant for a period of time while the building improved in value, similar impacts on local tax revenues could be expected for the new program.

Implementation Requirement: Requires State Law Change

A new preservation MFTE program designed to incentivize multifamily maintenance and rehabilitation requires a change to state law and adoption of a local ordinance authorizing the exemption.

Increase Repair & Weatherization Funding

As discussed in our homeowner causal model, a lack of financial resources is an impediment for low-income families in making home repairs. In order to address these concerns, SKC cities can supplement existing CDBG funding with additional local funding to provide additional home repair and weatherization services to low-income homeowners.

This strategy to address unhealthy housing was not included in Chapter 5’s recommended best practices for the following reasons:

- **Already Good Coverage:** The homeownership market is already well addressed in SKC by current programs. Due to the prevalence of home repair programs, including those run by non-profits, cities and King County, the region would be better served by balancing efforts to better promote efforts in the rental market.
- **Limited Reach:** The current model for home repair programs, discussed at length in Chapter 3, is ineffective at reaching a diverse population.

**Description of Program**

Home repair programs are city- or county-run programs that provide either grants or loans to low-income homeowners and in some cases to low-income renters for accessibility improvements. These programs aim to assist households who cannot afford to make critical repairs to their homes.

As discussed in Chapter 3, existing local policy provides weatherization assistance to low-income households through both the King County Housing Authority’s weatherization program and the Puget Sound Energy rebate program for households that make energy-saving improvements on their own. However, cities could gain significant improvements by funding additional
weatherization initiatives, specifically those related to healthy housing, if they encourage explicit linkages with home repair programs.

Often, weatherization work can be halted due to safety concerns, such as roof leaks and structural damage, which can limit the overall impact of weatherization to the point that the service should not be provided. Efficiencies could be gained by more closely linking weatherization and home repair through formal referrals between KCHA weatherization and local home repair programs. Also, by investing local dollars in home repair programs, cities can target areas missed by other programs, such as window replacements – an important component of a healthy home and one that is not funded through existing weatherization programs.

**Evaluation of Program**

**Improves Health: Improved Health for Limited Number of Homeowners Who Receive Funding**

Increasing funding for home repair and weatherization programs is a straightforward option that will undoubtedly provide health benefits to those that receive free repairs or take advantage of low-interest loans. Yet, there will be many homeowners who, even when made aware of a program's expansion, will not receive funding to assist them with healthy housing repairs because these programs are limited by available funding. Renters will rarely see a benefit.

**Improvement of Existing Housing: Impact Directly Tied to Allocated Funding**

Similar to the improvement of health, only a small segment of homes will benefit from the program. Thus, the degree to which an expansion of home repair programs improve a city's housing stock may be limited. Additionally, as home repair programs often cap on the maximum grant a single household or property can receive, the homes that require the most rehabilitation are less likely to be renovated up to housing health standards through this program.

---


172 See discussion of deferral solutions in “Healthy Housing Opportunities During Weatherization Work.”

**Equity: Limited Displacement but Inequitably Distributed Services**

Home repair programs limit displacement, as homeowners will mostly enact repairs that allow them to stay in their home. This is especially true for the minor home repair programs discussed in Chapter 3. However, historically, the benefits of home repair programs have been inequitably distributed to white homeowners, as discussed in Chapter 3, tending not to have the same level of benefit for people of color.

**Financial Feasibility: Predictable Outcomes Linked to Local Funding Levels**

Expansion of home repair and weatherization programs will require additional state or local funding. One strength of home repair programs is that there is a strong amount of certainty in outcomes. Home repair and weatherization program impacts are directly tied to the amount of allocated funding.

**Implementation Requirement: Increased Local and/or State Funding**

This strategy requires additional local funding, and if possible, an increase in state funding.

---

### Resident Education Programs

A lack of information regarding available programs and the connection between health and housing is an ongoing concern contributing to the unhealthy housing problem in SKC. *Resident education programs are a relatively low cost, easy to implement option that can help to decrease the information gap in low-income communities regarding health and housing interconnectivity.*

We chose not to include this type of program in our main analysis for the following reason:

- **Comparatively Low Impact:** The estimated impact is significantly lower than the potential impact of other programs included in our recommended package.

**Description of Program**

Resident education programs can involve information about programs and funding options available to residents as well as educational hands-on seminars for residents to further understand the health outcomes associated with unhealthy housing conditions. Resident education programs and workshops target the same information gap as do CHWs. While resident education programs lack rigorous study to support their effectiveness, they are low-cost and easily implementable solutions that cities could implement within a few months. For this reason, they are worthy of city consideration.

Similar to CHW interventions, resident education programs and workshops seek to empower residents by educating them of the connection between their home environment and their health.
These programs also share information regarding the many resources available to them to mitigate structural and health issues. For example, the City of Long Beach’s Healthy Homes Workshop’s goal is “to increase resident’s awareness and understanding of a healthy and safe home and community environment using practical hands-on exercises and interactive dialogues.” There is also a wide range of organizations, programs and even tax and rebate policies of which residents can take advantage. However, it is likely that the average resident is unaware of the many financial options available to them and even less aware of eligibility requirements. Examples of programs include the Washington State Housing Finance Commission's homebuyer education course. Cities can design tailored education courses and materials for their unique populations and constituencies.

**Evaluation:**

**Implements Health: Limited Impact on Health Outcomes**

Education and/or workshop programs can be constructed to allow members of the community, from all backgrounds, to be eligible for their services, thereby providing coverage to all of a city's residents. However, there is little evidence to support the effectiveness of such programs. They also present three key weaknesses:

- They struggle to garner a critical mass of interest and target those most in need of assistance.
- They rely on the initiative of residents, as opposed to the initiative of program advocates (like a CHW).
- Populations traditionally distrustful or disconnected from government services, who are more likely to be living in homes in need of healthy homes upgrades, will be the most difficult residents to serve through resident education programs.

Unfortunately, given a lack of evidence and the difficulty in attracting a critical mass of those in need, the guarantee of success in this program is small. Furthermore, online resources as well as educational seminars, such as the Homebuyer Education courses offered by the Washington State Housing Finance Commission already currently exist.176

---

175 For example, Habitat for Humanity has published a lengthy list of all city and nonprofit home repair and weatherization programs: [http://www.habitatskc.org/wp-content/uploads/King-Sno-Pierce_RepairPrograms_201107151.pdf](http://www.habitatskc.org/wp-content/uploads/King-Sno-Pierce_RepairPrograms_201107151.pdf).
Improvement of Existing Housing: *Minor Improvement through Increased Resident Initiative*

By enabling greater awareness of financial resources available to households, a greater number of homes in the area are more likely to repair their home. Thus, resident education programs may have some, albeit marginal, positive impact on preservation and improvement goals related to proactive and on-going home maintenance. These programs have a limited impact on existing housing quality due to the heavy reliance on residents to identify repairs, make repairs, and connect with other programs.

**Equity: May Not Reach Immigrant and Hard to Reach Populations**

While resident education programs would be designed to target those most in need, such as low income residents, they may be ineffective at attracting a diverse array of the city’s residents. Similar to home repair programs, which rely on residents to self-identify and self-select, resident education programs may attract a singular clientele without a concerted outreach effort. As a result, populations typically distrustful of government may not benefit from services.

As this program is primarily focused on empowering home maintenance and repairs through information provision, and not focused on large, system-wide rehabilitation and revitalization projects, it is unlikely to result in any displacement.

**Financial Feasibility: Low Cost, Easily Implementable**

Municipally organized education programs are low cost and can be implemented quickly, but they do require government staff time and resources to organize and host trainings and workshops. It would require some research and perhaps a consultant to organize and prepare an effective class with effective accompanying resources.

**Implementation Requirement: Budget Allocation for Staff Time**

In order to be effective, an occupant education program would need to appropriate funds for marketing, collateral, staff and outreach.

---

**Expanding Tax Incentives for Healthy Housing Improvements**

As explained in Chapter 3, one of the key causes of unhealthy housing as it afflicts single-family homeowners is the inability of many households to afford the cost of repairs. Existing tax incentives, like King County's Home Improvement Tax Abatement (KCHITA) program, mainly target major home renovations that add value and not routine maintenance or major projects crucial to maintaining a healthy home, such as a roof repair. *Seeking to expand the existing King County Home Improvement Tax Abatement program to exempt healthy housing repairs – including roof repairs,*
window, insulation and other replacements – is one way SKC can make repairs more financially feasible for low-income homeowners.

This report does not include this strategy as part of Chapter 5’s recommended best practices for the following reason:

- **State Law Change Required:** Expanding the KCHITA tax program would require a change to state law and therefore is omitted from Chapter 5 due to the uncertainty surrounding such a strategy.

**Description of Program**

To achieve greater health outcomes among low-income single-family households – particularly vulnerable populations – South King County cities can seek to expand the KCHITA program to include healthy home repairs made by low-income homeowners. By offering a financial incentive to make healthy and positive steps towards housing repair, newly eligible, single-family households will act more proactively to achieve the health outcomes desired. An expanded KCHITA program would provide qualifying, low-income renters with a deduction in their yearly property tax bill. This may work well in conjunction with a neighborhood community health worker, who can reach vulnerable populations directly and encourage them to utilize the tax incentives.

**Evaluation**

**Improves Health: Limited Improvement on Homeowner Health if Implemented Alone**

For a property tax exemption program to work, homeowners will need to take advantage of it and utilize it for healthy housing repairs. South King County cities can implement tax incentives to single-family homeowners in certain neighborhoods of need, similar to the City of Milwaukee’s Pilot Ordinance, which targets neighborhoods with high prevalence of lead-based paint.177

There are multiple examples of using tax incentives to encourage home repairs or maintenance on single-family homes.178 This type of program would certainly improve the health of fewer individuals than a program targeting individuals dwelling in multifamily properties.

---

177 http://www.nehh.org/LinkClick.aspx?fileticket=KaKHKQYENRe%3D&tabid=254
Improves Existing Housing: *Marginal Improvements for Single-Family Homeowners*

Currently, homeowners may struggle to receive a bank loan to implement healthy home repairs.\(^\text{179}\) Offering a reduction in their yearly property tax liability may incentivize homeowners to undertake needed repairs. Because this is an opt-in program for which residents must seek the tax incentives, cities may wish to include a marketing strategy in order to increase the likelihood of a substantial impact. Some examples of marketing materials include: multilingual pamphlets and videos, physician education, and local health department staff training. While all of these elements incur some cost, providing tax incentives is a way of investing in the health of the community.\(^\text{180}\)

Additional research is required to understand the extent to which homeowners would take advantage of such an incentive.

**Equity: Limited Displacement**

Because this program could help homeowners afford deferred maintenance, it can help homeowners stay in their homes. In addition, there is no evidence to show that the types of repairs that would be incentivized would require homeowners to be temporarily displaced during construction.

That said, because this program targets single-family homeowners and requires the homeowner to know about the program, it is likely to target a fairly homogenous group of white, older adults. People of color or people who speak limited English are much less likely to benefit.

**Financial Feasibility: Limited Fiscal Impact**

A local property tax exemption like this would require the cities to forego future property tax revenue. As this is a significant source of revenue for cities, that could be concerning to some city leaders and community members. However, because of the way Washington State property taxes are calculated, this would not be as burdensome as other programs that require budget allocations. Cities would still be allowed to collect the same amount of property taxes as in past years (plus a 1% inflation factor). In order to make up the difference, cities would need to shift the burden of exempted property taxes onto other homeowners. That would certainly cause some concern from other local property owners. Political concerns would need to be managed.

---


Implementation Requirement: *Requires State Law Change*

This policy requires first a change to state law and a subsequent local ordinance authorizing the exemption.
Many of the solutions discussed in Chapter 5 of this report require some amount of funding. In some cases, programs can be at least partially self-funded (rental inspection programs, low-cost revolving loans) while others will require significant new budgetary outlays. While SKC cities technically have the ability to fund these programs through either their general fund, CDBG dollars or a voter-approved levy, there are emerging and innovative ways to fund some programs such as community health workers, home repair programs, and inspection programs.

This section includes both explanations of innovative funding models and descriptions of resources that may be useful to SKC in identifying potential funding streams, including grants. Specifically, this section identifies three new funding mechanisms: social impact bonds (a pay for success model), billing healthy home interventions to Medicaid and hospital community benefit funding. We close by detailing specific grants that could be used to start new programs.

### B.1 Social Impact Bonds

**Description of Funding Source**

According to the Center for American Progress, a social impact bond (SIB) is defined as follows:

> “An arrangement between one or more government agencies and an external organization where the government specifies an outcome (or outcomes) and promises to pay the external organization a pre-agreed sum (or sums) if it is able to accomplish the outcome(s)”\(^{181}\)

In addition to the above-described arrangement, outside investment is typically required to fund initial start-up and operating costs. It is these investors that earn a return, but if and only if the program accomplishes its desired outcomes. For this reason, SIBs are said to operate under a "pay for success" (PFS) model wherein the bond “issuer” only begins paying back if the promised outcomes are achieved.

Thus, a social impact bond is similar in concept to traditional investments: some entity invests capital in expectation of realizing a return if the product succeeds. In social impact financing,

private or philanthropic investors assume the risk and “pay the upfront costs” necessary to catalyze a social, evidence-based project that offers a high probability of returning long-term savings. In many cases, the “payer” looking to save money is the government. However, it does not always have to be the government. For example, asthma prevention programs may result in cost-savings for both insurers and hospitals. One (or both) of these players would then use a portion of their savings to pay back investors, providing the investor with the required return on investment. This is the model used in the Fresno example detailed below. Preventative health care strategies, such as community health workers, are natural fits for social impact bond financing, as high quality preventative services can potentially yield substantial long-term cost savings.

**Implementation**

A generic social impact bond agreement includes the following key players:183, 184

- **The bond “issuer,”** commonly a nonprofit or non-profit organization, sometimes referred to as the “intermediary.” It is this organization that works directly with the service providing organization, if the organization itself is not providing the service.
- **Investors** that provide startup and working capital needed for the initiative to get under way and sustain itself.
- **The bond “backer”** or the institutional player who is a payer but wants to save some money. If cost savings occur and originally agreed upon outcomes are achieved, the backer pays the issuer a previously agreed upon amount plus enough to cover the premium needed to pay back investors at a required rate of return.

Scholars and practitioners suggest that SIBs are suitable only for the problems in which:

- “Outcomes can be clearly defined and historical data are available.”
- Proposed interventions have “high levels of evidence” already in existence.
- “Political will for traditional direct funding can be difficult to sustain.”

**Program Examples & Variations**

- **Health Impact Bonds in Fresno, CA:** In this example, the California Endowment provided the upfront investment needed to fund community health worker interventions to mitigate uncontrolled asthma in 200 households. Rather than the government acting as the backer of the bond, the California Endowment entered into an agreement directly with insurers and

---

186 Ibid.
employers such that if the preventative CHW initiative reduces insurer and employer medical costs, then these parties must repay the California Endowment a certain total.  

- **Reducing Asthma Related Hospital Visits in Alameda County, CA:** Alameda County has also used a pay-for-success SIB model to fund an in-home education program seeking to reduce asthma hospitalizations.  

### B.2 Billing Healthy Housing Services through Medicaid

**Description of Funding Source**
The passage of the Patient Protection and Affordable Care Act brought with it new opportunities for funding housing-related services with Medicaid dollars. We recommend that South King County join efforts with other state housing groups to support Washington State’s Medicaid waiver application to allow for services such as community health workers and in-home healthy housing assessments to be billed to Medicaid. Such legislation would allow for an ongoing community health worker-type of intervention to serve very low-income (Medicaid-eligible) households. Each visit to a Medicaid-eligible household would be eligible for reimbursement from the state’s Medicaid program.

Billing healthy housing services to Medicaid is a common-sense approach premised on evidence showing that certain interventions save Medicaid money by reducing hospital visits and other medical costs. A community health worker that assists a household in eliminating asthma triggers would lead to a reduction in emergency room asthma visits for the household and lower billings to Medicaid over time.

**Implementation**
In order for healthy housing services to be billed under Medicaid, the Washington State Department of Health and Human Services must seek a federal waiver or an amendment to the State Medicaid Plan. A waiver provides only a temporary exemption from certain Medicaid regulations (up to five years) for purposes of testing new policies, while a state plan amendment is permanent. Both the waiver and the state plan amendment require approval from the federal Center for Medicare and Medicaid Services (CMS). This process may require some back and forth between the

---


191 Ibid.
state and federal agencies. However, with proper planning, approval can be achieved in a reasonable time frame. Oregon, for instance, obtained approval from CMS in about a year, by having already prepared much of the supporting documentation and evidence of the benefits of the CHW model.192

While there are few drawbacks to using Medicaid to fund healthy home services, the funding will not likely become available for several years as the waiver application will need to be approved at the federal level. The state’s current Medicaid waiver application, if approved, would still require the local (King County) Accountable Communities of Health to approve expenditures on programs like CHWs. This is a promising funding stream that should be pursued, even if it takes multiple years to come to fruition.

**Program Examples & Variations**

- **Texas Environmental Lead Investigations:** The State of Texas received authorization to bill Medicaid for “environmental lead investigations,” which involve in-home visits and guidance on remediation.193

- **Multnomah County’s Healthy Homes Program:** Multnomah County, Oregon operates a Healthy Homes program (as discussed in Chapter 5) as a successful example of a CHW model in action. The Healthy Homes program bills visits from CHWs and nurse asthma educators to the state’s Medicaid plan for eligible beneficiaries.194 Medicaid reimburses for only a portion of total program costs, however, with the rest coming from local budget allocations.195

**B.3 Hospital Community Benefits For Healthy Housing Interventions**

**Description of Funding Source**

In order to maintain their tax-exempt status, non-profit hospitals must spend a portion of their revenue each year on “community benefits,” expenditures that provide some benefit to the community based on need. 196 Community benefits funding must be used to “improve access to services, enhance the health of the community, advance medical knowledge, and reduce government burden.”197 As discussed in Chapter 1, unhealthy housing has the inevitable cost of increased medical expenditures, burdening the medical system and the finances of those

---

192 Per interview with Multnomah County Public Health official.
195 Per interview with Multnomah County Public Health official.
197 Ibid.
experiencing adverse health effects. Hospitals have a vested interest in preventing unnecessary visits to the emergency rooms and investing a portion of the community benefit funding in healthy housing improvements.

Previously, hospitals directed most of their community benefit funding to paying for uninsured patients. However, under new provisions implemented as a result of the Patient Protection and Affordable Care Act (PPACA), hospitals must now complete needs assessments and target funding at a broader swath of health-related problems. New detail was added to the reporting form for hospitals, including a list of potential expenditures, one of which is “physical improvements and housing.” As a result, there is an opportunity to fund healthy housing strategies with hospital community benefit funding as the model shifts to encourage support for a more diverse set of projects and programs.

**Implementation**

Hospitals in King County have already joined together as part of a collaborative called “King County Hospitals for a Better Community” and recently completed a Community Health Needs Assessment. The report described the need for safe, healthy, and affordable homes in the local community. Community leaders in South King County could approach members of this health collaborative and request that they invest their community benefit dollars through some of the best practice solutions discussed in Chapter 5.

**Program Examples & Variations**

- **Children’s Hospital Boston:** Since 2005, Children’s Hospital Boston has operated a Community Asthma Initiative (CAI) aimed at reducing repeat hospitalizations with some of its community benefit dollars. The program works with a variety of partners, including

---

198 The PPACA has also lessened the demand for uninsured “charity” care as many more previously uninsured patients will become insured under Medicaid and through the private market. See “Hospital Community Benefits,” referenced above.

199 Robert Wood Johnson Foundation. “What’s New with Community Benefit?”


201 King County Public Health. “King County Hospitals for Healthier Communities.”

202 King County Hospitals for Healthier Communities. King County Community Needs Assessment 2015/2016.

the City of Boston’s Rental Inspection Program, and can fund pest control and home cleaning solutions that reduce asthma triggers.\textsuperscript{204}

### B.4 Federal and State Grants

Several federal and state grants potentially could fund the healthy housing strategies discussed in this report. These are summarized in the below table. While each grant targets a different spectrum of programs and services, healthy housing initiatives directly fall under each of these funding options. Some programs cater to certain grants more than others – for example, the Maternal, Infant, and Early Childhood Home Visiting grant is a near-perfect match for implementing a Promotores model. With that said, eligibility for the below funding sources is fairly broad.

<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
<th>Eligibility</th>
<th>Grant cycle</th>
<th>Amount granted</th>
<th>Funding Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>CHDOs and HOME Investment Partnership</td>
<td>Broad funding source for cities to work with local Community Housing Development Organizations (CHDOs) Utilizes HOME funds Includes rehabilitation, demolition, relocation, and more</td>
<td>Entitled to Washington State Must serve populations earning below a set AMI (varies based on project)</td>
<td>Yearly</td>
<td>Fluctuates</td>
<td>Federal - HUD</td>
</tr>
<tr>
<td>Choice Neighborhoods</td>
<td>Funds both planning and implementation of transformative housing projects</td>
<td>Open application Strong proposal and action plan</td>
<td>Sporadically</td>
<td>$76 mil. (2014 national total)</td>
<td>Federal - HUD</td>
</tr>
<tr>
<td>Community Transformation Grant</td>
<td>Funds programs that target healthy outcomes and activities Key objectives: combating chronic diseases, tobacco, and unhealthy lifestyles Features a Small Communities Program to improve health in communities with pop. of 500,000 or less</td>
<td>Open application Strong proposal and action plan</td>
<td>Yearly</td>
<td>$103 mil. (2011 national total) $797k (Tacoma-Pierce County, FY2012)</td>
<td>Federal - CDC</td>
</tr>
<tr>
<td>Preventative Health and Health Services Block Grant</td>
<td>Broad funding source for capital projects that improve community health Must target national health objectives as described in Healthy People 2020</td>
<td>Must target national health objectives as described in Healthy People 2020</td>
<td>Yearly</td>
<td>$136 mil. (2014 national total)</td>
<td>Federal - CDC</td>
</tr>
<tr>
<td>Neighborhood Stabilization Program (NSP)</td>
<td>Provides funding for the purchasing, rehabilitation, and stabilization of homes and neighborhoods Must assist households earning under 120% AMI Administered in stages since 2008; currently in its 3\textsuperscript{rd} stage (NSP3)</td>
<td>Administered in stages since 2008; currently in its 3\textsuperscript{rd} stage (NSP3)</td>
<td>Administered in stages since 2008; currently in its 3\textsuperscript{rd} stage (NSP3)</td>
<td>$1 billion (NSP3 national total)</td>
<td>Federal - HUD Administered by Washington State</td>
</tr>
</tbody>
</table>

Maternal, Infant, and Early Childhood Home Visiting

<table>
<thead>
<tr>
<th>Maternal, Infant, and Early Childhood Home Visiting</th>
<th>Health worker home visits help educate families on healthy choices and resources for childhood development</th>
<th>Funds states, territories, and tribal entities</th>
<th>Yearly</th>
<th>$386 mil. (2015 national total)</th>
<th>Federal - HHS</th>
</tr>
</thead>
</table>

Washington State Housing Trust Fund

<table>
<thead>
<tr>
<th>Washington State Housing Trust Fund</th>
<th>Offers programs to combat lead-based paint, as well as weatherization services</th>
<th>Low-income, child-occupied households or dwelling in units built pre-1978</th>
<th>Stage 1: 2015-17</th>
<th>Situational; depends on strength of application</th>
<th>State - Department of Commerce</th>
</tr>
</thead>
</table>

Other Funding Sources

Listed below are several additional funding sources that some stakeholders in SKC are currently discussing. We briefly describe their potential relation to funding healthy housing in SKC:

- **Pacific Hospital Public Development Authority (PDA)**: Pacific Hospital PDA has provided over $20 million in funding for projects and programs to support health access and reduce health disparities since 2003.205 One ongoing grant is the Outreach to Vietnamese and Somali Communities at Yesler Terrace, a $136,048 project that provides two community health workers to these immigrant populations.206 This is just one example of funding the intersection between health and housing.

- **Seattle Foundation**: The Seattle Foundation’s current campaign, GiveTogether 2015, provides grants ranging from $10,000 - $25,000 to non-profits addressing issues of health and wellness, immigrant communities, and more.207

- **United Way**: One ongoing campaign of United Way is Bridge to Basics, which connects families and individuals with food and health services. Part of this campaign’s goal is to increase health in the home and ensure children have access to health care.208

- **The Bill and Melinda Gates Foundation**: Does not fund health projects in developed countries.209

---


APPENDIX C: POLITICAL FEASIBILITY

This report presented and recommended a set of best practices to improve housing in the rental and homeownership markets. These strategies have varying degrees of intensity and impact on major stakeholders, making some options more politically feasible than others. This appendix discusses the potential concerns regarding the political feasibility of these options. This was not included as one of our evaluation criteria because many of the regulatory options will encounter similar opposition from landlords and property managers. Therefore, this measure is constant across most recommendations. Additionally, SKC cities, their councilmembers and city staff members are better positioned to specifically evaluate the political feasibility of options in the context of their city's unique political climate.

While certain options that intervene in the rental market will face heavy opposition from key stakeholders, as discussed below, intentionally reframing the issues and jointly implementing the best practices can assuage some concerns.

Regulatory Strategies in the Rental Market and Landlord Opposition

Three policies will draw critical opposition from landlord and property management associations:

1. **Enacting and enforcing the National Healthy Housing Standard (NHHS) and integrating into local building codes.** Even under current reactive code enforcement, adopting more stringent building codes will inevitably increase costs for some property owners who are forced to comply with a more stringent standard of building quality.

2. **Enacting and enforcing Proactive Rental Inspection Programs.** By applying and enforcing building codes on all rental units, costs will increase for all currently noncompliant rental units and their property owners. However, rental inspection programs can actually save property owners money in the long term by encouraging proactive maintenance rather than allowing expensive conditions to develop by deferring maintenance.

3. **Enacting and enforcing a Just Cause Eviction Ordinance (JCEO).** JCEO gives property owners less flexibility and flips the power structure against them. As a result, landlords will likely oppose a JCEO.

In addition to those listed above, cities are likely to hear two arguments from landlords on why these various programs are unnecessary and/or unfair:

- **First,** landlords will argue that building codes and rental inspection programs are overly burdensome on them, and they will likely seek to weaken inspection provisions. Seattle’s experience passing its rental inspection ordinance offers clues of the strategies SKC landlords will pursue. During talks regarding Seattle’s Rental Inspection Ordinance, property owners attempted to include a provision that would allow owners to "self-
certify,” eliminating the requirement to use either city code enforcement officers or qualified private inspectors.

- **Second,** landlords may argue that inspection programs will make operating rental properties less profitable – or even unprofitable – as incomes and rents in SKC are not sufficiently high to pay for expensive repairs. Landlords will argue that these policies will, as a result, place an unfair burden on them or force them out of business.

- **Third,** Cities that seek to implement JCEO ordinances will also face fierce opposition from landlord groups on the grounds that existing law already covers disagreements between tenants and the landlords and that retaliation is specifically accounted for.

**Increasing the Political Feasibility of the Options**

- **Offer code compliance loans to ease the burden and costs imposed by rental inspection programs and code enforcement.** Cities looking to implement inspection requirements can assuage concerns by offering financing to low-margin property owners. (See discussion of code compliance loans in Chapter 5.)

- **Make clear that inspection programs can actually save landlords money in the long term.** Both building code updates and inspection programs increase the quality of existing housing by encouraging proactive maintenance. This positive effect will clearly benefit property owners who may otherwise defer regular maintenance, allowing minor problems to develop into major, extremely costly problems. Second, experienced and trained inspectors can identify subtle maintenance needs that a landlord might otherwise overlook, helping the landlord to take actions that will slow depreciation and extend the life of the property.

- **Make clear that JCEOs can be seen as beneficial for landlords looking to preserve their property.** As discussed in Chapter 5, tenants do not report their unhealthy housing conditions for fear of retaliatory evictions. A JCEO can be a benefit to a property owner in cases where this fear of eviction is not justified, and where the landlord wants to make repairs without eviction, because it lets the property owner know of emerging problems.

In summary, while the political opposition from landlord groups will be strong, SKC cities still have the opportunity to enact these more forceful interventions. As the experience in Tukwila and Seattle shows, regulation of the rental market can be implemented in spite of these forces. Additionally, this discussion showcases the need for SKC cities to implement a holistic set of options. Code compliance loans and other incentives can go a long way in responding to landlord concerns.

---

APPENDIX D: EXISTING POLICY DETAIL—WASHINGTON STATE LANDLORD TENANT ACT

For families living in unhealthy housing, the Washington State Residential Landlord-Tenant Act provides a framework to resolve disputes over unit maintenance and overall living conditions."211 The process to escalate a landlord’s failure to bring a unit into compliance, however, is complicated and not an easy process to complete.

Duties of Landlords and Tenants: RCW 59.18.060 provides general duties of landlords and tenants with regard to upkeep of a unit. In addition to ensuring a given unit meets local code enforcement standards, landlords are required to “maintain the structural components including, but not limited to, the roofs, floors, walls, chimneys, fireplaces, foundations, and all other structural components, in reasonably good repair so as to be usable.”212 Further, landlords are to “provide a reasonable program for the control of infestation by insects, rodents, and other pests at the initiation of the tenancy and, except in the case of a single-family residence, control infestation during tenancy except where such infestation is caused by the tenant.”213

Conversely, tenants have a responsibility to maintain their unit during their tenancy and are responsible for paying for any damage they cause.214 Tenants are responsible for maintenance that may cause the onset of unhealthy conditions, including the requirement to “properly dispose from his or her dwelling unit all rubbish, garbage, and other organic or flammable waste, in a clean and sanitary manner at reasonable and regular intervals, and assume all costs of extermination and fumigation for infestation caused by the tenant.”215

Resolving Disputes: In cases where a landlord has failed to properly maintain a unit or is unable to bring a unit into compliance, a tenant can take action to repair the unit themselves. Because many municipalities in Washington State do not have proactive rental inspection programs, tenants must “self-enforce” the law, meaning that the burden of responsibility lies with the tenant to know his or

---

213 Ibid.
215 Ibid.
her rights and proactively take action against a delinquent landlord. Tenants have several options when a landlord does not repair a unit. First, the tenant must give a written letter of information to his/her landlord, noting the issues in need of repair. If the landlord does not respond to the issue within a predetermined period of time, the tenant has the following options, contingent on the tenant being up-to-date on rent and utilities:

- A tenant may hire a contractor to repair a unit, after providing notice to the landlord, and deduct the cost of the repair from one month's rent.
- A tenant can move out from a unit, after a period of time has passed.
- A tenant may pursue litigation or arbitration to solve the dispute.
- A tenant can initiate a process to place their rent payments in an escrow account. This involves having local code enforcement examine the unit and certify that substandard or dangerous conditions are present. Landlords must be properly notified throughout the process before payment into an escrow account can be made.

State law prohibits landlords from taking retaliatory actions if the tenant exercises the rights listed above. Specifically, retaliatory actions are those taken by the landlord within 90 days of a tenant's action. (Under state law, it can be assumed that actions taken within 90 days are retaliatory.)

Retaliatory actions include: raising rent, "reducing services provided to the tenant, or evicting the tenant." Taking action against a landlord is a complicated process for any tenant, let alone one with limited resources, limited English language abilities, or a weak support network. In cases of absentee landlords, the initial monetary cost of repairing a unit falls on the tenant, which is a particularly harmful predicament for low-income and already cost-burdened households. As a result, many tenants may find themselves without the ability to address these concerns themselves, allowing a lack of maintenance to give way to persistent unhealthy living conditions.
Two of the authors of this report completed a separate multivariate analysis of American Housing Survey data to determine the effect of certain unhealthy housing conditions on property values (Table 3, below) and the effect of unhealthy housing conditions on monthly home maintenance costs (Table 5, following page). Maintenance costs did not include utilities. The data analyzed was from the Seattle MSA and included only homeowners. For the full report, the “Determinants of Home Repairs and Maintenance and the Cost of Non-Repairs: Evidence from the 2013 American Housing Survey,” please contact the authors of this report.

Table 3, below, shows that certain conditions, such as crumbling foundations, cracks in walls and broken windows, can drag property values down by tens of thousands of dollars. Table 5, on the following page, illustrates that certain unhealthy conditions, such as exterior water leaks, can increase the amount of money households spend on routine maintenance, even holding income constant.

<table>
<thead>
<tr>
<th>Table 3: Results for Predicting Home Values</th>
<th>Coeff.</th>
<th>Std. Error</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Home Characteristics</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year constructed</td>
<td>761.2***</td>
<td>(30.46)</td>
</tr>
<tr>
<td>Rooms in Home</td>
<td>35,210***</td>
<td>(459.0)</td>
</tr>
<tr>
<td>Has porch</td>
<td>13,692***</td>
<td>(2,647)</td>
</tr>
<tr>
<td>Has garage</td>
<td>22,170***</td>
<td>(2,073)</td>
</tr>
<tr>
<td><strong>Unhealthy Home Conditions</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sagging roof</td>
<td>-14,409**</td>
<td>(6,527)</td>
</tr>
<tr>
<td>Interior water leaks</td>
<td>-8,193***</td>
<td>(3,173)</td>
</tr>
<tr>
<td>Exterior water leaks</td>
<td>-3,144</td>
<td>(2,574)</td>
</tr>
<tr>
<td>Crumbling foundation</td>
<td>-16,896***</td>
<td>(4,044)</td>
</tr>
<tr>
<td>Cracks in walls</td>
<td>-15,729***</td>
<td>(4,142)</td>
</tr>
<tr>
<td>Broken windows</td>
<td>-27,368***</td>
<td>(4,741)</td>
</tr>
<tr>
<td><strong>Neighborhood/Locational Characteristics</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Near open space</td>
<td>4,661**</td>
<td>(1,985)</td>
</tr>
<tr>
<td>Near businesses</td>
<td>-6,509**</td>
<td>(2,617)</td>
</tr>
<tr>
<td>Near Industry</td>
<td>-21,255***</td>
<td>(6,446)</td>
</tr>
<tr>
<td>Roads in Need of Repair</td>
<td>1,829</td>
<td>(4,618)</td>
</tr>
<tr>
<td>Plumbing Shared With Neighbors</td>
<td>-27,829***</td>
<td>(8,865)</td>
</tr>
<tr>
<td>Near Vandalized Homes</td>
<td>-22,049***</td>
<td>(5,650)</td>
</tr>
<tr>
<td>Nearby homes have junk</td>
<td>-19,170**</td>
<td>(8,589)</td>
</tr>
<tr>
<td>Located in noisy area</td>
<td>-13,056***</td>
<td>(3,580)</td>
</tr>
<tr>
<td>Near water</td>
<td>20,431***</td>
<td>(2,638)</td>
</tr>
<tr>
<td><strong>Urban-Rural Status (Outside MSA Central City)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inside MSA Urban</td>
<td>10,779***</td>
<td>(2,170)</td>
</tr>
<tr>
<td>Inside MSA Rural</td>
<td>12,765***</td>
<td>(2,894)</td>
</tr>
<tr>
<td>Outside MSA Urban</td>
<td>-28,150***</td>
<td>(3,699)</td>
</tr>
<tr>
<td>Outside MSA Rural</td>
<td>-15,998***</td>
<td>(3,074)</td>
</tr>
<tr>
<td><strong>Observations</strong></td>
<td>33,195</td>
<td></td>
</tr>
<tr>
<td><strong>R-squared</strong></td>
<td>0.404</td>
<td></td>
</tr>
</tbody>
</table>

Note: Standard errors in parentheses. Fixed effects not shown here.
*** p<0.01, ** p<0.05, * p<0.1
Table 5: Results for Monthly Maintenance Expenditure

<table>
<thead>
<tr>
<th>Explanatory Variables</th>
<th>Monthly Maintenance Costs</th>
<th>T-Stat</th>
<th>Including Unhealthy Home Characteristics</th>
<th>T-Stat</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personal Finances</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing costs/income</td>
<td>-0.006</td>
<td>-0.612</td>
<td>-0.006</td>
<td>-0.610</td>
</tr>
<tr>
<td>Income Stable</td>
<td>-3.420</td>
<td>-1.606</td>
<td>-2.826</td>
<td>-1.327</td>
</tr>
<tr>
<td>Family income</td>
<td>1.114***</td>
<td>9.681</td>
<td>1.127***</td>
<td>9.803</td>
</tr>
<tr>
<td><strong>Householder Characteristics</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spouse absent and child</td>
<td>1.431</td>
<td>0.643</td>
<td>1.117</td>
<td>0.503</td>
</tr>
<tr>
<td>Spouse absent</td>
<td>-2.308</td>
<td>-1.160</td>
<td>-2.359</td>
<td>-1.288</td>
</tr>
<tr>
<td>HH difficult to dress</td>
<td>8.961</td>
<td>1.327</td>
<td>6.729</td>
<td>0.996</td>
</tr>
<tr>
<td>Age</td>
<td>-0.399***</td>
<td>-5.567</td>
<td>-0.373***</td>
<td>-5.206</td>
</tr>
<tr>
<td>Female</td>
<td>2.537</td>
<td>1.445</td>
<td>2.631</td>
<td>1.501</td>
</tr>
<tr>
<td>No GED</td>
<td>-1.581</td>
<td>-0.452</td>
<td>-1.671</td>
<td>-0.478</td>
</tr>
<tr>
<td>High School Diploma</td>
<td>-2.411</td>
<td>-1.003</td>
<td>-2.337</td>
<td>-0.973</td>
</tr>
<tr>
<td>Bachelor’s Degree</td>
<td>3.900*</td>
<td>1.659</td>
<td>3.968*</td>
<td>1.690</td>
</tr>
<tr>
<td>Post Bachelor degree</td>
<td>8.297***</td>
<td>3.092</td>
<td>7.922***</td>
<td>2.955</td>
</tr>
<tr>
<td>Hispanic</td>
<td>7.754***</td>
<td>2.402</td>
<td>7.983***</td>
<td>2.476</td>
</tr>
<tr>
<td>Black</td>
<td>13.994***</td>
<td>4.218</td>
<td>12.706***</td>
<td>3.829</td>
</tr>
<tr>
<td>American Indian</td>
<td>18.912</td>
<td>1.511</td>
<td>18.114</td>
<td>1.450</td>
</tr>
<tr>
<td>Asian</td>
<td>7.224</td>
<td>1.549</td>
<td>7.623</td>
<td>1.637</td>
</tr>
<tr>
<td><strong>Neighborhood Fabric</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Close Knit Strongly agree</td>
<td>0.881</td>
<td>0.388</td>
<td>1.255</td>
<td>0.553</td>
</tr>
<tr>
<td>Close Knit Somewhat agree</td>
<td>0.778</td>
<td>0.358</td>
<td>0.873</td>
<td>0.403</td>
</tr>
<tr>
<td>Close Knit Somewhat disagree</td>
<td>-3.795</td>
<td>-1.155</td>
<td>-4.226</td>
<td>-1.287</td>
</tr>
<tr>
<td>Nearby homes have junk</td>
<td>1.874</td>
<td>0.210</td>
<td>-0.566</td>
<td>-0.063</td>
</tr>
<tr>
<td>Near Vandalized Homes</td>
<td>2.579</td>
<td>0.375</td>
<td>0.471</td>
<td>0.069</td>
</tr>
<tr>
<td><strong>Repair &amp; Home Factors</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of improvements</td>
<td>5.508***</td>
<td>14.613</td>
<td>5.263***</td>
<td>13.918</td>
</tr>
<tr>
<td>HH has done own repairs</td>
<td>-1.450</td>
<td>-0.780</td>
<td>-1.543</td>
<td>-0.830</td>
</tr>
<tr>
<td>First time homeowner</td>
<td>-4.346**</td>
<td>-2.321</td>
<td>-4.262**</td>
<td>-2.279</td>
</tr>
<tr>
<td>Unit SF</td>
<td>0.002***</td>
<td>4.921</td>
<td>0.002***</td>
<td>4.701</td>
</tr>
<tr>
<td>Home value</td>
<td>0.602***</td>
<td>17.076</td>
<td>0.606***</td>
<td>17.205</td>
</tr>
<tr>
<td>Year constructed</td>
<td>-0.410***</td>
<td>11.818</td>
<td>-0.378***</td>
<td>-10.789</td>
</tr>
<tr>
<td>Mobile home</td>
<td>-1.481</td>
<td>-0.349</td>
<td>-0.319</td>
<td>-0.737</td>
</tr>
<tr>
<td><strong>Other Neighborhood/Locational</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inside MSA Urban</td>
<td>-3.215</td>
<td>-1.431</td>
<td>-3.203</td>
<td>-1.428</td>
</tr>
<tr>
<td>Inside MSA Rural</td>
<td>0.642</td>
<td>0.222</td>
<td>0.648</td>
<td>0.224</td>
</tr>
<tr>
<td>Outside MSA Urban</td>
<td>-10.697***</td>
<td>-2.720</td>
<td>-10.898***</td>
<td>-2.798</td>
</tr>
<tr>
<td>Outside MSA Rural</td>
<td>-10.324***</td>
<td>-3.344</td>
<td>-10.469***</td>
<td>-3.394</td>
</tr>
<tr>
<td><strong>Repair Assistance/Incentives</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gov. assist for repairs</td>
<td>-0.549</td>
<td>-0.092</td>
<td>-1.645</td>
<td>-0.277</td>
</tr>
<tr>
<td>Received energy credit</td>
<td>1.013</td>
<td>0.262</td>
<td>1.516</td>
<td>0.392</td>
</tr>
<tr>
<td><strong>Unhealthy Home Characteristics</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sagging roof</td>
<td>8.539</td>
<td>1.246</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interior water leaks</td>
<td>2.299</td>
<td>0.765</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exterior water leaks</td>
<td>12.576***</td>
<td>4.910</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Crumbling foundation</td>
<td>6.281</td>
<td>1.481</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cracks in walls</td>
<td>10.148**</td>
<td>2.373</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Broken windows</td>
<td>3.000</td>
<td>0.641</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Constant</td>
<td>868.959***</td>
<td>12.613</td>
<td>802.003***</td>
<td>11.519</td>
</tr>
<tr>
<td>Observations</td>
<td>15,341</td>
<td></td>
<td>15,338</td>
<td></td>
</tr>
<tr>
<td>R-squared</td>
<td>0.097</td>
<td></td>
<td>0.100</td>
<td></td>
</tr>
</tbody>
</table>

*** p<0.01, ** p<0.05, * p<0.1. Note: Family income and home values are per $10,000.
### Recommended Best Practices

<table>
<thead>
<tr>
<th>Goals and Criteria</th>
<th>Create a Community Health Worker Program</th>
<th>Adopt National Healthy Housing Standard</th>
<th>Implement a Proactive Rental Inspection Programs</th>
<th>Offer Code Compliance Loans</th>
<th>Just Cause Eviction Ordinances</th>
<th>Regional Acquisition Fund</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improves Health:</td>
<td>++</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td><strong>Homeowners</strong></td>
<td>CHWs provide health-improving information to residents.</td>
<td>Homeowners benefit from purchasing homes built to a healthier code.</td>
<td>Homeowners are not the primary focus of this program.</td>
<td>Homeowners are not the primary focus of this program.</td>
<td>Homeowners are not the primary focus of this program.</td>
<td>Depending on local priorities, the fund could provide some new homeownership opportunities for low-income families.</td>
</tr>
<tr>
<td><strong>Renters</strong></td>
<td>CHWs provide health-improving information to residents.</td>
<td>Renters benefit from dwelling in units maintained up to healthier standard.</td>
<td>All renters benefit from regular enforcement of code and housing health.</td>
<td>Renters will benefit where property owners receive loans.</td>
<td>Renters will be empowered to submit complaints against landlords and rectify health and quality issues.</td>
<td>Preservation of affordability and quality of existing rental units will occur.</td>
</tr>
<tr>
<td><strong>Improvement of Existing Housing</strong></td>
<td>+</td>
<td>=</td>
<td>=</td>
<td>=</td>
<td>=</td>
<td>+</td>
</tr>
<tr>
<td><strong>Improvement of Existing Housing</strong></td>
<td>Residents bear the brunt of repair costs. But CHWs increase likelihood residents will make repairs &amp; utilize programs.</td>
<td>Limited impact without strict code enforcement.</td>
<td>Proven to decrease deferred maintenance, improve rental housing quality, and protect tenants.</td>
<td>Without large appropriations, only a few dozen units, at most, can benefit each year. Over time the program can have a substantial impact.</td>
<td>As tenants report unhealthy housing more frequently, cities become increasingly aware of these issues and require repairs.</td>
<td>The acquisition fund would directly work to rehabilitate existing housing.</td>
</tr>
<tr>
<td><strong>Equity</strong></td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td><strong>Minimal to No Displacement</strong></td>
<td>Reduces displacement by allowing residents to improve homes, stay in place.</td>
<td>Some property owners may displace tenants to comply with code.</td>
<td>Tenants increase reporting of unhealthy housing.</td>
<td>Major repairs may result in minimal displacement without a tenant relocation assistance program.</td>
<td>ICDIs directly displace but not based on reporting of conditions.</td>
<td>Major repairs may require tenant relocation, but can be mitigated through anti-displacement project planning.</td>
</tr>
<tr>
<td><strong>Affordability Preservation</strong></td>
<td>No change from status quo.</td>
<td>Potential increase in rents due to newly required repairs.</td>
<td>Tenants with lowest incomes are likely to be impacted by some amount of rental increase, particularly in cases where costly repairs are required.</td>
<td>Deeds tied to loans ensure affordability for residents</td>
<td>No change from status quo in cases where property owners still cannot afford to make repairs.</td>
<td>Rehabilitation projects financed with acquisition funds ensure permanent affordability for residents.</td>
</tr>
<tr>
<td><strong>Impact on Low-Income People of Color, Immigrants, and Vulnerable Populations</strong></td>
<td>CHWs are most effective when drawn from local communities. High impact and effectiveness in immigrant communities.</td>
<td>These groups gain from improved building codes.</td>
<td>City-mandated inspections improve housing for immigrant tenants who avoid risks associated with reporting unhealthy conditions.</td>
<td>Immigrants and people of color will benefit, as they live in buildings most likely to take advantage of these loans.</td>
<td>Immigrant populations are most likely to be intimidated by their landlords and wary to benefit from protections.</td>
<td>Acquisition could focus on vulnerable populations in rental units.</td>
</tr>
<tr>
<td><strong>Financial Feasibility</strong></td>
<td>$$$$</td>
<td>$</td>
<td>$</td>
<td>$$</td>
<td>$</td>
<td>$$</td>
</tr>
<tr>
<td><strong>Cost to City</strong></td>
<td>Costs range between $200 and $1100 per patient, but Medicaid financing can cover part of cost.</td>
<td>Does not require substantial costs, aside from administrative staff time.</td>
<td>Staff time to design program; Some costs recouped through business license and non-compliance fees.</td>
<td>Implementing this loan program would require significant upfront costs, some of which could be recouped over time.</td>
<td>Some staff costs associated with enforcement of the ordinance.</td>
<td>Would require considerable investment at the local level.</td>
</tr>
<tr>
<td><strong>Immediacy Of Impact</strong></td>
<td>Can be implemented within a 1 - 2 year startup timeframe.</td>
<td>Some impact on new housing, but will take time to be incorporated into existing housing.</td>
<td>Some lag time before all properties are inspected.</td>
<td>May take time for property owners to take advantage of loans after a new program is created.</td>
<td>Benefits may accrue immediately for some, but larger long-term impact will occur as landlords adjust their behavior.</td>
<td>A long-term solution with limited benefits in first few years.</td>
</tr>
<tr>
<td><strong>Existing Infrastructure</strong></td>
<td>CHWs need to be hired and trained, work by a local non-profit or other partner.</td>
<td>The NIHIS and local resources available.</td>
<td>Many resources and precedents are available to South King County cities who begin this type of program.</td>
<td>Most S&amp;K cities lack technical staff to effectively operate this program.</td>
<td>Can be modeled based on Seattle’s JCEO.</td>
<td>Potential start-up costs for an entity organizing the fund (potentially a regional housing partnership).</td>
</tr>
<tr>
<td><strong>Certainty of Impact</strong></td>
<td>High certainty of impact, evidence-based.</td>
<td>Impact is uncertain without effective code enforcement.</td>
<td>Proven to be effective at improving housing quality.</td>
<td>Loans are earmarked for rehab or code compliance in the most needy multifamily units. Will most certainly have a positive impact on health and unit quality.</td>
<td>Tenants increase reporting of unhealthy conditions.</td>
<td>High certainty of regional impact, proportional to local budgetary allocations.</td>
</tr>
<tr>
<td><strong>Implementation Requirement:</strong></td>
<td>Budget Allocation</td>
<td>Local Ordinance</td>
<td>Local Ordinance</td>
<td>Budget Allocation</td>
<td>Local Ordinance</td>
<td>Budget Allocation</td>
</tr>
</tbody>
</table>

**APPENDIX F: Improving Health and Housing in South King County, Evaluation of Best Practices**
## APPENDIX F: Improving Health and Housing in South King County, Evaluation of Best Practices

### Additional Options

<table>
<thead>
<tr>
<th>Goals and Criteria</th>
<th>Occupant Education Programs</th>
<th>Add'l Funding for Home Repair &amp; Weatherization</th>
<th>Multi-Family Tax Exemption for Rehabilitation</th>
<th>Expanding Tax Incentives for Healthy Home Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improves Health:</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>= / +</td>
</tr>
<tr>
<td>Homeowners</td>
<td>Marginalizes increases resident access to information regarding programs and health outcomes.</td>
<td>Low-income homeowners are direct beneficiaries, but impact is limited by costs.</td>
<td>Homeowners will not be affected by this program.</td>
<td>Homeowners would take advantage of the resources and inherent benefits of home repair. Impact is limited when implemented on its own.</td>
</tr>
<tr>
<td>Renters</td>
<td>Marginalizes increases resident access to information regarding programs and health outcomes.</td>
<td>Does not affect most renters.</td>
<td>A selection of property owners will take advantage of tax exemptions to make improvements.</td>
<td>Renters are not the primary focus of this program.</td>
</tr>
<tr>
<td>Improvement of Existing Housing:</td>
<td>+</td>
<td>+</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>Improvement of Existing Housing</td>
<td>Residents become aware of resources and can identify unhealthy conditions. Does not address financial need for repairs.</td>
<td>Has marginal benefits to some homes.</td>
<td>Improves buildings that take advantage of incentive.</td>
<td>Repairs made as a result of such a program are likely to be minor but will provide some benefit to existing housing.</td>
</tr>
<tr>
<td>Equity:</td>
<td>= / +</td>
<td>= / +</td>
<td>= / +</td>
<td>= / +</td>
</tr>
<tr>
<td>Minimal to No Displacement</td>
<td>Does not displace residents, attempts to empower tenants to make changes.</td>
<td>Minor repairs allow families to stay in their homes by maintaining quality.</td>
<td>This type of program on its own does not displace families due to major repairs. However, there is potential for joint programs for tenant relocation.</td>
<td>Limited displacement as most repairs will be minor in nature.</td>
</tr>
<tr>
<td>Affordability Preservation</td>
<td>No change from status quo.</td>
<td>Limited impact on affordability. Increases property value in homeowner market in some cases.</td>
<td>Would ensure affordability for low-income residents of buildings that utilized MFTE rehabilitation incentive.</td>
<td>Limited impact on affordability. Increases property value in some cases.</td>
</tr>
<tr>
<td>Impact on Low-Income People of Color, Immigrants, and Vulnerable Populations</td>
<td>Without direct, culturally-appropriate marketing, communities disconnected from government unlikely to benefit.</td>
<td>Generally serves white non-immigrant homeowners without direct outreach. Weatherization programs may reach more diverse base.</td>
<td>Offering tax exemptions has potential to have a large impact on multifamily properties housing low-income immigrant communities.</td>
<td>Immigrant communities are more likely to live in multifamily rental housing and would not likely benefit from this program.</td>
</tr>
<tr>
<td>Financial Feasibility:</td>
<td>$</td>
<td>$</td>
<td>$ / $</td>
<td>$ / $</td>
</tr>
<tr>
<td>Cost to City</td>
<td>Can be implemented at a low cost. Requires staff time and materials.</td>
<td>Home repair programs are costly to implement and do not scale well.</td>
<td>Tax exemptions may lead to a decline in city revenue. However, building improvements add property value.</td>
<td>Can be constructed to be cost efficient. But ultimately, it is not economically sound to invest heavily in incentives for single-family repairs.</td>
</tr>
<tr>
<td>Immediate Impact</td>
<td>May not see immediate health or housing outcomes.</td>
<td>Has lasting benefit but will take years to reach many homeowners.</td>
<td>Takes time for property owners to learn how to access the tax exemption.</td>
<td>In the short term, homeowners can utilize the tax statements and be proactive in their response to home repair needs.</td>
</tr>
<tr>
<td>Existing Infrastructure</td>
<td>Some education materials exist.</td>
<td>Many run their own repair programs already.</td>
<td>Robust MFTE programs currently exist for new housing and can act as a model for design and implementation.</td>
<td>There are several examples across the country that can be used as a model for design and implementation.</td>
</tr>
<tr>
<td>Certainty of Impact</td>
<td>Very little evidence to suggest these programs are effective.</td>
<td>Benefits proportional to the amount of new funding invested.</td>
<td>Uncertainty in whether or not property owners will take advantage of the new incentive.</td>
<td>There is no guarantee of impact. There is also little evidence done explicitly on healthy housing tax incentives.</td>
</tr>
<tr>
<td>Implementation Requirement:</td>
<td>Budget Allocation</td>
<td>Budget Allocation</td>
<td>State and Local Law Change</td>
<td>State and Local Law Change</td>
</tr>
</tbody>
</table>