



ATRÓMITOS
CONSULTING DONE FEARLESSLY

WASHINGTON STATE DEPARTMENT OF COMMERCE

**Proposal for Community-Based Housing
Advisory Committee**

December 29, 2023

Washington State Department of Commerce
Housing Division
1101 Plum Street SE
P.O. Box 42525
Olympia, WA 98504-2525

Via e-mail: HTFStakeholderCommunications@commerce.wa.gov

RE: Proposal for Community-Based Housing Advisory Committee

Dear Sir or Madam:

Atrómitos appreciates the opportunity to respond to the Washington State Department of Commerce's [Proposal for Community-Based Housing Advisory Committee](#). Atrómitos is a woman-owned consulting firm specializing in health and human services safety-net programs, particularly Medicaid. Our mission is to improve healthcare and other social services to create healthier, more equitable, and more resilient communities. Atrómitos' recent work has included a toolkit to support Community Based Organizations' participation in Medicaid supportive housing programs, and a landscape scan of Washington's immigrant communities to inform Washington Health Benefit Exchange's strategy to expand health insurance coverage. These projects and others exemplify Atrómitos' deep commitment to addressing equity through health and housing policy, strategy, and organizational governance in the state of Washington. It is with this background that we respectfully submit the following comments:

(1) The Department of Commerce should commit to continuous evaluation of the proposed PAT replacement structure to ensure that historically marginalized people are involved in decision-making.

The Washington State Department of Commerce is the primary agency in the state that supports access to affordable housing. The Affordable Housing Advisory Board and the Policy Advisory Team (PAT) that advises it (which will be disbanded and replaced with a new, more equitable stakeholder engagement process) provide advice to the Department of Commerce about important decisions, including how capital is expended through the Housing Trust Fund to preserve affordable housing, land use, coordination of state and federal initiatives, reducing barriers to affordable housing, public-private cooperation in housing development, and housing tax policies.

In its December 1, 2022 letter to the Housing Trust Fund and the PAT, a diverse group of constituents requested that the PAT membership be reformed to be more equitable, as noted in the Department's proposal. This letter emphasized having a seat at the table to impact decisions that affect people living in affordable housing or experiencing homelessness:

[a]s a primary policy advisory body for the State Housing Trust Fund, the PAT plays an important role in decisions that impact the lives of low-income people, people living in affordable housing, and people experiencing homelessness. The PAT makes recommendations on decisions including the HTF application process and loan policies, how Commerce expends funds, and what standards affordable housing developers must meet in order to qualify for funds and to be in good standing with the state. Each of these issue areas have significant racial equity implications; yet, the PAT membership currently does not represent the diversity of perspectives that is necessary to make strong policy informed by impacted communities and rooted in equity.

In response, the Department of Commerce is recommending a new four-part stakeholder engagement framework to address these concerns. It includes (1) the creation of a new Community-Based Housing Advisory Committee (CBHAC) to replace the PAT with a more inclusive and equitable membership, (2) Public Forums and Assemblies for information dissemination and feedback, (3) Ad-hoc Task Forces and Advisory Groups to work on specific policies as needed, and (4) avenues for Agency Partners and Consortia to provide input.

We applaud the Department for making this effort to address the dual concerns raised by the community: making membership and stakeholder engagement more inclusive and ensuring that the result is a true seat at the decision-making table. To understand if these two goals are being achieved, the Department should:

- **engage in a continuous improvement process to evaluate progress toward these two goals, and publicly communicate what this process would look like;**
- **seek ongoing feedback from the communities that requested the changes and any new voices that may come to the table through this reformed process about how it is going; and,**
- **publish timely progress reports that explain whether the changes are working and what more may be needed.**

As an example, with the process now being divided into four different arenas, the Department might ask the CBHAC if it felt it was able to provide input into the policies developed by the task forces and if that input was taken into consideration in a meaningful way. And if not, what would make that better?

The Department also discussed at the December 5 AHAB meeting whether and how associations or proxy groups that represent the impacted communities should participate in this new process. A progress assessment should evaluate the extent to which proxies are being used and if their participation, in lieu of people with lived experience, is addressing the original concern.

We could also imagine the Department identifying new core stakeholders through its public process and work with the CBHAC. For example, [Accountable Communities of Health](#) are regional organizations that engage local communities to promote health equity

and coordinate around social determinants of health. They have experience with both BIPOC community engagement and rental assistance and housing. Will the new process be nimble enough to include these new voices continuously, and if not, how should it change?

Continuous improvement efforts are essential to realizing the Department's commitment to equity, anti-racism, and housing justice. We recognize that the department is engaging significant resources to make important changes, and we encourage the Department to think of this not as a one-time process that will end but as an ongoing effort to build trust and reform the structural inequities in policy-making processes.

(2) The Department should consider additional ways to embed equity in all policy development through further self-assessment and action.

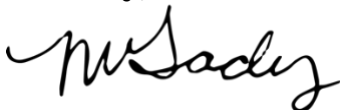
In addition to getting feedback from the communities engaged in the above stakeholder processes, the Department should conduct a self-assessment to understand how its policy-making could more meaningfully involve the communities it serves. For example, the department might assess:

- which policies and programs impact historically disadvantaged communities;
- whether processes exist for engaging impacted communities in decision-making, through public forums, committees like the CBHAC, and other avenues;
- if the department has relationships with impacted communities, and if not, how could those be developed;
- if impacted communities understand how to participate in the policy-making process and if they feel that their voices are heard;
- what policies have improved through more equitable policy-making processes; and
- what additional actions should the department take as a result of the above assessment to improve equity in policy-making?

Finally, the Department should consider establishing best practices based on its learnings from the PAT replacement framework and the above assessment to ensure continuous improvement occurs through the Department's work.

Atrómitos appreciates the Department undertaking this important work and is ready to assist to improve equity in health and housing policies. If you have any questions, please contact me at michealle@atromitosconsulting.com.

Sincerely,



Michealle Gady, JD
Founder, President, & CEO
Atrómitos, LLC