Annual PHA Plan *(Standard PHAs and Troubled PHAs)*	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.

(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.

(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.

(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.

(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.

(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A. PHA Information.

A.1

PHA Name: Housing Authority of the City of Everett **PHA Code**: WA 006

PHA Type: ☒ Standard PHA ☐ Troubled PHA

PHA Plan for Fiscal Year Beginning: (MM/YYYY): 07/2021

PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)

Number of Public Housing (PH) Units 245 **Number of Housing Choice Vouchers (HCVs)** 3,313 **Total Combined Units/Vouchers** 3,558

PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission

Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans.

Everett Housing Authority's proposed 2021-22 Annual Plan is available for public review at the following locations:

- EHA's website: www.evha.org
- EHA's main administrative office at 3107 Colby Avenue, Everett, WA is currently closed to the public as an emergency measure to limit the spread of the COVID 19 coronavirus. Members of the public who wish to make arrangements to review the proposed Plan and related material should call (425) 626-0108.

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	
				PH	HCV
Lead PHA:					

	-					

B. Annual Plan Elements

B.1 Revision of PHA Plan Elements.

(a) Have the following PHA Plan elements been revised by the PHA?

Y N
☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs
☐ ☒ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☒ ☐ Financial Resources.
☒ ☐ Rent Determination.
☒ ☐ Operation and Management.
☐ ☒ Grievance Procedures.
☐ ☒ Homeownership Programs.
☒ ☐ Community Service and Self-Sufficiency Programs.
☐ ☒ Safety and Crime Prevention.
☐ ☒ Pet Policy.
☒ ☐ Asset Management.
☐ ☒ Substantial Deviation.
☐ ☒ Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):
See attachment a01

(c) The PHA must submit its Deconcentration Policy for Field Office review.
See attachment b01

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?

Y N
☒ ☐ Hope VI or Choice Neighborhoods.
☐ ☒ Mixed Finance Modernization or Development.
☒ ☐ Demolition and/or Disposition.
☐ ☒ Designated Housing for Elderly and/or Disabled Families.
☐ ☒ Conversion of Public Housing to Tenant-Based Assistance.
☐ ☒ Conversion of Public Housing to Project-Based Assistance under RAD.
☐ ☒ Occupancy by Over-Income Families.
☐ ☒ Occupancy by Police Officers.
☐ ☒ Non-Smoking Policies.
☒ ☐ Project-Based Vouchers.
☐ ☒ Units with Approved Vacancies for Modernization.
☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project based units and general locations, and describe how project basing would be consistent with the PHA Plan.
See attachment c01

B.3 Civil Rights Certification.

Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations,* must be submitted by the PHA as an electronic attachment to the PHA Plan. See attachment d01

B.4	**Most Recent Fiscal Year Audit**. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☒ (b) If yes, please describe:
B.5	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan. See attachment e01
B.6	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) provide comments to the PHA Plan? Y N ☒ ☐ See attachment f01 (c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
B.7	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attachment g01
B.8	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☒ ☐ (b) If yes, please describe:
C.	**Statement of Capital Improvements**. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
C.1	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD. HUD approved the most recent CFP grant on 10-07-2020 via the EPIC portal.

Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section.

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Annual Plan. All PHAs must complete this section.

B.1 Revision of PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(1)) Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. (24 CFR §903.7(a)(2)(ii))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions**. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

☐ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☐ **Homeownership Programs**. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☐ **Community Service and Self Sufficiency Programs**. Describe how the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. (24 CFR §903.7(l)) A description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention.** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund; or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii))

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 **New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **Hope VI or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Mixed Finance Modernization or Development. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30)

☐ **Demolition and/or Disposition.** Describe any public housing projects owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1**) development name and number; **2**) designation type; **3**) application status; **4**) date the designation was approved, submitted, or planned for submission, and; **5**) the number of units affected. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j))

☐ **Conversion of Public Housing.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to project-based assistance under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the

unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21. (24 CFR §903.7(e))

☐ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan. (24 CFR §903.7(b))

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Civil Rights Certification. Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulation*, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

B.5 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.6 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

B.7 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

B.8 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

C. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))

C.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form- 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 9.2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

The following elements have been revised since the Annual Plan effective July 1, 2020 was submitted:

Statement of Housing Needs and Strategy for Addressing Housing Needs

Background

The most recent Census data cited in Snohomish County's 2020-24 Consolidated Plan[1] shows a total 274,671 households living in the County, with a median household income of $70,722. For purposes of determining eligibility for most housing programs, Snohomish County is part of the Seattle-Bellevue Metropolitan Statistical Area (MSA). The 2020 median family income for the Seattle-Bellevue MSA is $113,300.

The median family income amount is updated annually and adjusted for household size to determine the low income (80% of Area Median Income (AMI)), very low-income (50% AMI) and extremely low-income (30% AMI) limits for various housing programs. Most of Everett Housing Authority's (EHA) rental housing and other housing assistance are dedicated to households below 50% AMI or 30% AMI.

EHA currently administers 3,160 Housing Choice Vouchers (HCVs) and 254 Public Housing units. It also owns and operates an additional 1,459 units, some of which receive project-based voucher assistance. Most of its units are located within the City of Everett, with the exception of several small developments for seniors, that are located elsewhere in Snohomish County. HCV program participants can use their vouchers to lease a unit anywhere in Snohomish County without porting.

Everett, Snohomish County, and the Puget Sound region as a whole faces a growing affordable housing crisis, as the supply of both affordable and market rate housing has lagged population increases, placing upward pressure on rents and pushing housing further out of reach for a growing share of the population. In 2019, a renter in Snohomish County needed to earn at least $29.94 per hour to afford a 1-bedroom apartment, while the median renter wage was just $18.60 per hour. A minimum wage worker would need to work 75 hours per week to afford a modest 1-bedroom apartment at the fair market rent.[2]

Extremely Low-Income Households

Of the total county population, 37,439 households, or roughly 14% of all households in the county, are considered extremely low income (ELI). The share of ELI households within the City of Everett is slightly higher, at 18%.[3] As in most communities, the need for affordable housing among ELI households greatly outstrips the available supply of affordable units and housing vouchers. Statewide, there are only 30 affordable units for every 100 ELA rent households.[4]

Most ELI households within Snohomish County spend a disproportionate amount of monthly income towards rent (18,713 households spend >30% and 15,166 households spend >50%), making affordable rental housing the most pressing need by far in comparison to other housing problems (substandard facilities, overcrowding) among such households within EHA's jurisdiction. The need for affordable rental

[1] Snohomish County Consortium (Snohomish County, City of Everett, City of Marysville) Joint 2020-24 Consolidated Plan
[2] National Low-Income Housing Coalition, Out of Reach 2019: Washington.
[3] Root Policy Research AI & LAP, May 2019, Section 2, p. 8 (2013-17 ACS)
[4] National Low-Income Housing Coalition, *The Gap*, 2017, p. 16.

housing is particularly acute among households with minor children at risk of homelessness, given the direct relationship between housing stability and children's school performance and ability to thrive.

Based on the Consolidated Plan's data analysis, local Hispanic households experience one or more housing problems disproportionate to the ELI population as a whole, while Pacific Islander households disproportionately experience severe cost burden.[5]

Elderly Households

Elderly households make up a significant number of the County's rent burdened ELI households, representing 7,973 or just under a quarter of 33,879 total. In general, the elderly population of Snohomish County is expected to increase significantly over the next few years, and it is projected that by 2025 almost a quarter (24.8%) of all County residents will be age 60+.[6]

Households with Disabilities

Current Census Bureau data shows persons with a disability under the age of 65 represent 8.2% of the County's population overall, while the most recent Analysis of Impediments to Fair Housing indicated that 16% of households within the City of Everett include a person with disability. There is no available data to indicate the overall number of ELI disabled households within the jurisdiction.

The City of Everett's draft 2020 Analysis of Impediments to Fair Housing identified the lack of data about compliance with Fair Housing Act accessibility requirements in the city as an impediment to fair housing for people with disabilities. The report further noted that the most common type of disability in Everett is having an ambulatory difficulty. [7]

EHA Wait Lists

As of July 2020 EHA has a total of 7,074 households on its Tenant and Project-based Voucher wait lists. Of the referenced households, 12% qualify for an elderly allowance, and 40% qualify for a disability allowance. In terms of racial makeup, 67% of households on the Voucher wait lists identify as White, 24% as Black, and 14% as Asian or Other. The overlap is accounted for by households that identified as belonging to two or more racial categories on the application. Within the context of ethnicity, 10% identify as Hispanic.

The greatest need is for smaller units, with 71% needing a one or two-bedroom unit, 18% needing a three-bedroom unit, and fewer than 1% needing a four-bedroom or larger unit.

EHA's recent Analysis of Impediments (2019) found that Black/African American households make up just 5% of the income-qualified population yet comprise 25% of households on the voucher wait list.[8] This finding was consistent with the most recent wait list data and represents strong evidence that the private market is unable to provide a sustainable level of affordable housing to this demographic.

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[5] Consolidated Plan, pp. 68,69
[6] Snohomish County Area Plan on Aging 2012-15, Section B-1, p. 1
[7] City of Everett draft AI, February 2020, p. 12.
[8] Root Policy Research AI & LAP, May 2019, Section 2, p. 11

Strategy for Addressing Housing Needs

Taking the above into account, the Housing Authority intends to engage in the following strategic actions to address local housing needs over the course of the 2021-22 Plan year:

- Initiate plans to create 1,500 EHA-owned or supported housing units by 2030, primarily through new development. These development activities will target populations whose needs have either been neglected or will grow substantially over the next decade, including but not limited to: households with children (homeless families in particular), and elderly households. In addition, a percentage of newly constructed units will be accessible to people with disabilities, in compliance with federal requirements.
- Continue to spearhead advocacy efforts at the city, county, state, and federal levels to expand housing opportunities within EHA's jurisdiction for extremely low-income families with children, in partnership with local non-profits (e.g., Housing Consortium of Everett & Snohomish County) and agencies, with a focus on policy development and allocation of resources.
- Pursue additional Voucher resources from HUD when they become available, such as through the Mainstream program. Since January 2020, EHA has received 78 Mainstream Vouchers for non-elderly people with disabilities through competitive and non-competitive applications, with an additional allocation of 75 Mainstream Vouchers to be awarded in February 2021.
- Increase access to communities of opportunity for marginalized populations through flexibilities that may be available under existing programs, or via the MTW program.
- Promote policy reform to the greatest extent possible to uproot institutional racism and bring traditionally disadvantaged communities to a place of equity.
- Continue to develop partnerships with other PHAs and community-based organizations (CBOs) in order to learn new ways to best serve our residents in racially equitable ways.
- Create additional mechanisms for increased resident feedback so we are able to better include their input for the purposes of pursuing racial equity.

<u>Rent Determination</u>

EHA is applying to join the Moving to Work (MTW) demonstration under Cohort #2, Rent Reform. If EHA is accepted into the demonstration, EHA will be implementing a test rent policy known as Tiered Rent for 6 years. Because of the application timing and time needed for resident outreach and implementation, the Tiered Rent policy may be under development but not yet implemented during the fiscal year covered by this Annual Plan.

Qualifying families would include assisted families where the head, co-head, spouse, or sole member are not elderly (62+) during the 6 year period, and are not disabled at selection, and the family is not participating in the Family Self-Sufficiency program or the Homeownership voucher program. EHA refers to these families as "employment-focused".

The purpose of the policy is to determine if it provides greater incentives for employment-focused families to increase their earned income compared with the current rent policy, since rent will not be changed as often.

Key features of the Tiered Rent policy would include:

- Half of qualifying households would be randomly selected to continue paying rent under the current policy and half of qualifying households would be selected to pay rent under the Tiered Rent policy.

- The family's share of rent would be calculated based on 30% of gross, rather than adjusted, income.

- Income would only be verified every 3 years. During the 3 years between income determinations, the family's rent would not change, unless the family experienced a hardship.

- Instead of rent being set at exactly 30% of income, families would pay a fixed rent amount based on the tier of income they fall into at the time of their reexamination. Tiers would be in increments of $2,500. Rent for the tier would be set at 30% of the midpoint of that tier.

- Families with zero to $2,499 in annual gross income would pay a minimum rent of $50.

- If the family experienced a decrease in income that would drop them to a lower rent tier between reexaminations, the family could request to have their rent decreased to the rent associated with their new income tier. Hardship rents would be approved for up to 12 months, with the ability for families to request a renewal if the hardship continued.

Financial Resources

The chart below contains estimated financial resources for administration of programs and Public Housing Capital expenditures for the Annual Plan year 2021-22.

Public Housing Operating Fund	$0
Public Housing Capital Fund/DDTF	$640,101
Annual Contribution for Section 8 Tenant-Based Assistance	$43,150,000
Public Housing Dwelling Rental Income	$0
FSS Program Grant	$72,000
Local Government Grants	$210,200
CARES Act Funding	$650,000

Operation and Management

In conjunction with its 5-Year Plan goal to direct resources towards creating diverse, healthy communities of opportunity where children and adults flourish, EHA will pursue the following activities over the course of 2021-22:

- If EHA's application to be part of the Moving to Work Demonstration under Cohort 2, Rent Reform, is successful, EHA will develop and implement policies to realize the benefits of the demonstration, including implementing tiered rents for households in the treatment group of the rent study.
- If HUD provides additional opportunities for PHAs to expand Voucher participant access to communities of opportunity, such as the Mobility Demonstration, EHA will review the opportunity and consider applying if we qualify.
- Seek community input to refine existing industry definitions of communities of opportunity and develop plans accordingly.
- Complete community surveys to develop plans for transforming EHA residential communities into communities of opportunity.
- Develop support and other resident services plans to enhance opportunities for tenants of EHA properties to achieve their aspirations.
- Explore the development and implementation of multiple Payment Standards to facilitate access to low poverty areas within EHA's Housing Choice Voucher Program jurisdiction. This could be accomplished through implementation of Small Area Fair Market Rents, by setting Payment Standards for different parts of EHA's operating area at different percentages of the Metro Area Fair Market Rent, or through application of MTW flexibility if EHA is admitted to the MTW demonstration.
- Continue to provide additional support to lessen unit search times for Mainstream Vouchers, which tend to be single member families. EHA hopes to issue Vouchers to applicant families from the HCV program waiting list in 2022, at which time staff will provide housing search services to increase HCV families with children living in low poverty neighborhoods.
- Contingent on admission to the MTW program and the flexibilities it offers, EHA will explore the development of and implement a local preference for families with children and/or other strategies to increase the percentage of families with children served by the HCV Program.
- Initiate Master Planning for the yet to be redeveloped Baker Heights Public Housing parcels.
- Initiate land acquisition activities to further expand our housing development pipeline.

EHA will pursue the following activities over the course of 2021-22 as it relates to its 5-Year Plan goal to ensure the race—as well as other physical or social characteristics or sexual orientation—of any client or staff will have no impact on how they fare in EHA's programs or their potential in the organization:

- Develop and include Performance goals related to diversity, equity and inclusion in plans for director accountability and a revised employee performance evaluation process.
- Develop and implement additional Diversity, Equity, and Inclusion training plans for all staff.

- The Human Resources department will continue to develop policies and procedures to increase the diversity and talent pool of EHA's staff, while also establishing, in concert with the DEI Director, programs and policies that create and sustain a racially inclusive organization.
- Develop an information tool to extract updated data on staff and client demographics in order to inform EHA decision making.
- The Director of Diversity Equity and Inclusion (DEI) and the Senior Policy Analyst will brainstorm a range of areas of policy and data needs in order create additional structure to support racial equity.
- The Director of DEI, alongside a cross-departmental team of EHA staff, will develop new policy/guidelines intended to curb racist behaviors from residents.
- The Executive Director and the Director of DEI will lead EHA's efforts to connect with local, state and national organizations to lay the groundwork for supporting external DEI initiatives.
- Continue the Limited English Proficiency (LEP) Committee and recruit additional members. The Committee will be tasked with revising EHA's Language Access Plan and developing associated procedures for staff, to ensure all applicants, residents, and participants have equal access to and understanding of EHA's programs, policies, and procedures.

EHA will pursue the following activities over the course of 2021-22 with respect to its 5-Year Plan goal of creating a workplace where every employee is proud of their contribution to EHA's mission:

- Use qualitative and quantitative means (e.g., Staff Advisory Group, focus groups, surveys) to gather staff input in developing EHA's plans and initiatives related to this objective.
- Tailor the extent of staff outreach to the type and significance of impacts of policy, plan or program changes.
- Ensure that all staff who volunteer their thoughts and ideas represent a maximum of diversity—race, gender, orientation, etc. – by building trust within EHA among leadership and line staff.
- Create a culture where all staff personally and corporately embrace excellence by establishing efficient processes that empower and motivate our employees to excellence.
- Develop a consistent performance evaluation process that is used as the basis for compensation adjustments.
- Foster a culture of growth by establishing a balance between challenging and nurturing EHA employees, from the top down.

Community Service and Self-Sufficiency Programs

In early 2020 EHA was awarded a HUD Family Self-Sufficiency program grant, allowing for the hiring of an additional full-time FSS staff member. The hiring process has been delayed, but we expect to have a new FTE on board during the first quarter of calendar year 2021. EHA's FSS program will maintain a caseload of 55-60 clients served by 2 FTEs over the course of the 2021-22 Plan year.

Safety and Crime Prevention

EHA has not revised this element since its last Annual Plan submittal but remains firmly committed to safeguarding housing protections for victims of domestic violence, dating violence, sexual assault, and stalking, as expressed by the following statement:

VAWA Statement

Pursuant to the requirements of the Violence Against Women Reauthorization Act of 2013, Everett Housing Authority will remain attentive to the needs of applicants, program participants, and their respective family members who are victimized by all forms of domestic violence, including stalking and dating violence. The Public Housing, Section 8 HCV, and RAD PBV programs have enacted policies that protect the rights of both applicants and participants affected by domestic violence. When it can be shown that criminal activity or lease violations are related to domestic violence perpetrated against victims and their families, such individuals will not be disqualified for admission or have their assistance terminated.

Everett Housing Authority refers victims of domestic violence to appropriate legal and social service agencies, including but not limited to: the police department, the court system (for restraining orders), Northwest Justice Project (offers legal aid for low income individuals), Domestic Violence Services of Snohomish County, YWCA's Pathways for Women. The Housing Authority operates Pivotal Point Apartments, a 20-unit Project-Based Voucher development for victims of domestic violence, in partnership with DVS of Snohomish County

Asset Management

In conjunction with its 5-Year Plan goal to work towards the creation of 1,500 EHA owned or supported housing units by 2030, primarily through new development, EHA will pursue the following activities over the course of 2021-22:

- Construction of 105 tax credit units on a portion of the Baker Heights neighborhood through an affiliate, Everett Housing Legacy LLLP. This project will include 67 PBV units designated for extremely low-income homeless families with children enrolled in Everett Public Schools and an on-site early learning facility. This activity represents the first subsidized units to be developed as a part of EHA's commitment to one-for-one replacement of public housing units.
- Initiate master planning for the remaining phases of the Baker Heights redevelopment, including a preliminary development plan.
- Expand the capacity of EHA's development department to implement EHA's development objectives.

To the maximum extent permitted by HUD regulation, proceeds from the sale of the Scattered Sites will be applied towards the purchase of replacement affordable housing with units subsidized through Project-Based Vouchers.

EHA intends to replace the Baker Heights (WA006 000 100) and Scattered Sites units (WA005-000-500) on a one for one basis over time through new development, acquisitions, and the redevelopment of a portion of Baker Heights. The last activity anticipates construction of housing units in multiple phases, with the first parcel conveyed via ground lease at less than fair market value to Everett Housing Legacy LLLP to oversee construction of 105 tax credit units. Later phases may include use of a design-build development model.

EHA will expend its FY 2021 Capital Fund allocation of $640,101 on the final phase of major renovations to the main administrative office at 3107 Colby Ave. in Everett, a project that is split between multiple grants, and renovations to the Facilities office. Work at Colby is expected to include reconfiguring and building out the front desk and lobby areas, replacing damaged windows, remodeling the kitchen/breakroom area, and upgrades to the lighting and intercom systems, as well as purchasing furniture for the new offices and conference room areas and minor renovations to the parking garage area. Work at the Facilities office is expected to include carpet replacement, renovation of the kitchen/breakroom area, reconfiguration of the interior office space, replacing the furnace, clean out/repair of the stormwater drainage system, installation of a new fence and electronic security gate bordering the Baker Heights Legacy development, and resurfacing the driveway behind the Facilities office.

Deconcentration Policy

EHA's deconcentration policy for its Public Housing developments is located in the following section of the Public Housing Admissions and Occupancy Policy:

12.3 Deconcentration of Poverty and Income Mixing

A. The EHA's admission policy is designated to provide for de-concentration of poverty and income-mixing by bringing higher income residents into lower income developments and lower income residents into higher income developments.

B. Gross annual income is used for income limits at admission and for income-mixing purposes.

C. Skipping of a household on the waiting list specifically to reach another household with a lower or higher income is not to be considered an adverse action to the household. Such skipping will be uniformly applied until the target threshold is met.

D. The EHA will use the gathered resident incomes information in its assessment of its public housing developments to determine the appropriate designation to be assigned to the project for the purpose of assisting the EHA in its de-concentration goals.

The following elements have been revised since the Annual Plan effective July 1, 2020 was submitted:

Hope VI/Choice Neighborhoods

In the event a Choice Neighborhoods Initiative (or successor program) application is announced and EHA is eligible, the agency will explore pursuing a Planning and/or Implementation Grant for Baker Heights and the surrounding neighborhood.

Demolition and/or Disposition

The Baker Heights property (WA006 000 100) will be divided up and developed in phases. At this time it is unclear whether Washington State University will acquire the majority portion of Baker Heights, as the parcel may not be suitable for expansion of their new campus. A portion of the property will be conveyed via ground lease at less than fair market value to an affiliate, Everett Housing Legacy LLLP. In order to mitigate against strategic development pipeline impacts should the sale to WSU not go through, EHA will engage a consultant to propose a master plan for subsequent phases of redevelopment. As an alternative development strategy, EHA may apply for a Choice Neighborhoods Planning and/or Implementation Grant to finance the redevelopment of the entire Baker Heights property and the surrounding neighborhood.

EHA will also explore options for the sale of a portion of Wiggums Hollow Park that is under the ACC Project Number and Declaration of Trust for Baker Heights, which could include the possibility of a land swap. EHA will seek HUD's approval of an amendment to the current Section 18 disposition plan to cover these activities.

EHA anticipates it will have sold all 44 of the Public Housing Scattered Site units (WA005 000 500) when the 2021-22 Annual Plan goes into effect. Contingent on the final disposition of Baker Heights, EHA will engage in the closeout activities that will end its participation in the Public Housing program, as enumerated in HUD Notice PIH 2016-23. This will include the submission of a Retention Application for the Colby administrative and Facilities offices, non-dwelling use properties now under the ACC Project Number and Declaration of Trust for Baker Heights. EHA intends to retain the Colby administrative and Facilities offices in accordance with the terms of HUD Notice PIH 2016-20 upon termination of Public Housing ACC contract.

Project-Based Vouchers

EHA will utilize Project-Based Vouchers at 67 of the 105 tax credit units to be constructed during the first phase of the Baker Heights redevelopment effort. These Vouchers will be designated for extremely low income homeless families with school-aged children in Everett public schools. EHA may also allocate PBVs to new acquisitions as a means of preserving the affordability of those properties for extremely low-income households. As opportunities arise for acquisition of replacement housing units for Baker Heights, EHA will Project-Base Vouchers in a portion of the units in the newly acquired properties.

EHA is also analyzing the feasibility of converting nine (9) properties with HUD 202 Project-Based Rental Assistance Contracts (PRACs) to Project-Based Voucher (PBV) contracts through the Rental Assistance Demonstration (RAD) program. Confirmations of interest have been submitted to HUD for all nine (9) properties. Some of those RAD conversions may move forward during the 2021-2022 fiscal year. The portfolio includes a total of 369 assisted units that would be converted to RAD PBV units. In addition, associated with a recapitalization of those nine (9) properties and four (4) additional senior properties, EHA may project-base an additional 20 vouchers in units that are not currently rent subsidized.

Certifications of Compliance with PHA Plans and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 02/29/2016**

PHA Certifications of Compliance with the PHA Plan and Related Regulations including Required Civil Rights Certifications

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the___ 5-Year and/or X Annual PHA Plan for the PHA fiscal year beginning July 1, 2021, hereinafter referred to as" the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
   - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
   - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
   - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
   - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
15. The PHA will keep records in accordance with 24 CFR 85 20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Everett
PHA Name

WA 006
PHA Number/HA Code

_X__ Annual PHA Plan for Fiscal Year 2021_

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

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

Name of Authorized Official	Title
Allison Warren-Barbour	Chair, Board of Commissioners
Signature	Date
	Mar 22, 2021

Goal One: Create 1,500 EHA-owned or supported housing units by 2030 primarily through new development.	
Objectives	***Progress Made in Year One (Beginning July 1, 2020)***
Implement highly innovative and increasingly cost-effective development strategies. These may include: • Nontraditional development models, for example, design-build versus design-bid-build • Energy-efficient and sustainable modular housing • Innovative building materials such as cross-laminated timber (CLT)	EHA has continued to explore the design-build development model, especially with respect to the next phase(s) of the Baker Heights redevelopment.
EHA's development activities will generate increased annual net cash flow to support EHA's mission through: • Maximizing income from developer fees • Generating net cash flow from operation of new properties • Creating a sustainable pipeline of tax credit syndications and re-syndications • Continuing existing and pursue additional strategic dispositions to increase affordable housing stock	In Spring 2021 EHA anticipates commencing the construction of 105 tax credit units on a portion of the Baker Heights neighborhood (WA006 000 100) through a tax credit partnership, Everett Housing Legacy LLLP, to include 67 PBV units designated for extremely low-income homeless families with children enrolled in Everett Public Schools (EPS). These families will receive supportive services and ECEAP classes in partnership with EPS and the Snohomish County Human Services Department at an early learning facility that will be constructed on-site. Current tax credit partnership operating budgets were carefully monitored to ensure payment of developer fees and make use of replacement reserves for capital work when appropriate. EHA closed on the purchase of Pepperwood Apartments, a 25-unit senior property in south Snohomish County, in August 2020.
EHA's development activities will address the effects of institutionalized racism by championing diversity, equity, and inclusion. These activities will include: • Developing housing primarily in communities of opportunity, especially those where subsidized housing has been excluded.	EHA's development team is in the process of incorporating DEI into its development planning model. EHA will make DEI a central feature of its community engagement efforts when developing a masterplan for the remaining phases of the Baker Heights redevelopment.

• Investing in neighborhoods where housing has deteriorated due to market forces and public policy • Significantly increasing housing for families with children • Engaging with all neighborhoods to advocate for acceptance of multifamily nonmarket housing to address our communities' needs EHA's development activities will target populations whose needs have either been neglected or will grow substantially in the next decade. These will include, but not be limited to: • Households with children, especially homeless families • Elderly households and individuals	
Goal Two: Direct our resources towards creating diverse, healthy communities of opportunity where children and adults flourish.	
Objectives	***Progress Made in Year One (Beginning July 1, 2020)***
Transform existing properties into communities of opportunity. • Use community health survey data and other sources of community and resident input to identify priority needs for individual communities – families with children, elderly, mixed populations. • Align existing staff and other resources with programs and strategies that address identified priorities. • Expand the Family Self-Sufficiency Program (FSS) and related self-sufficiency programs to increase participant income-earning potential and asset building. • Leverage EHA resources to substantially increase access to existing and future opportunities available in the community (e.g., Everett Community College and new Washington State University campus).	The Resident Services Department analyzed survey results to identify priority needs of tenants across EHA communities: i.e. food insecurity; a lack of basic necessities; assistance with paperwork. systems navigation, and community engagement. Food insecurity and mental and behavioral health related needs saw a marked increase during the COVID 19 pandemic. In response, EHA forged partnerships with the Snohomish Health District and the Snohomish County Nourishing Neighborhood program to address systemic inequities behind health issues and food insecurity. EHA began partnering with South Everett Fire Department to assist residents with high utilization of 911 emergency services. EHA continued to partner with Homage Senior Services and Snohomish County LTCA to provide services to seniors; as well as connecting residents to senior centers and other programs. EHA also continued its partnership with UW Bothell Nursing School to provide health outreach programming. EHA is expecting to add a second FSS Program Coordinator by the end of January 2021, potentially doubling the

	number of FSS program participants in the intermediate future. The FSS program continued to partner with Housing Hope 's College of Hope and EduPloyment programs, which provide education and training opportunities for households pursuing financial self-sufficiency.
Significantly increase access to communities of opportunity through the Housing Choice Voucher program. • Identify residential areas with low poverty, good public schools, and access to transportation, employment opportunities, and other amenities where families with children can flourish. • Explore and implement alternative payment standards to increase access to such "communities of opportunity." • Pursue resources like the Mobility Demonstration funded by Congress in 2019 and 2020 budgets to fund activities under this objective. • Direct resources to assist voucher holders with their housing choices, for example, housing search assistance. • Use potential flexibilities through the Moving to Work Demonstration Program (or other demonstration opportunities) and/or waivers to design programs and policies that align with this objective.	EHA explored the possibility of applying for HUD's Mobility Demonstration in partnership with the Housing Authority of Snohomish County (HASCO), as EHA did not have the required number of client households to apply for this program on its own; however, this proposed joint endeavor did not work out in the end. EHA will apply for the Moving to Work Demonstration (MTW) program in January 2021. If successful, the agency will join a cohort tasked with studying the effects of rent reform. EHA also intends to explore the feasibility of implementing other flexibilities the MTW program may offer, such as alternative payment standards. The HCV team had great success in leasing the first allocation of Mainstream Vouchers. Of the first 26 vouchers issued, 25 leased-up. The 26th voucher ported to another PHA and was expected to lease-up as well. Leasing success was directly attributed to providing additional housing search assistance, regular check-ins, and warm handoffs to deposit assistance programs.
Develop new housing opportunities primarily in communities of opportunity (See Strategic Objective #1).	EHA's development team has continued to pursue this objective.
Goal Three: A workplace where every employee is proud of their contribution to EHA's mission.	
Objectives	***Progress Made in Year One Beginning July 1, 2020***
EHA will create a culture of inclusion by maximizing the use of staff ideas and talents to pursue this objective and EHA's mission as a whole, by:	EHA's senior management team has continued to plan activities in pursuit of this objective.

• Using qualitative and quantitative means (e.g., Staff Advisory Group, focus groups, surveys) to gather staff input in developing EHA's plans and initiatives related to this objective. • Tailoring extent of staff outreach to the type and significance of impacts of policy, plan or program changes. • Ensuring that all staff who volunteer their thoughts and ideas represent a maximum of diversity – race, gender, orientation, etc.	
EHA will create a culture where all staff personally and corporately embrace excellence, by: • Establishing stretch goals and high standards for individuals, teams, departments and agency wide. • Acknowledging and rewarding organizational, team and personal achievement. • Continuing high performer status under HUD assessment programs. • Continuous improvement in operations outcomes. • Local, state and national recognition for agency achievement. • Pursuing access to achievement-based demonstration programs, e.g., Moving to Work Demonstration.	EHA continued to implement strong internal controls and integrity of financial operations. Staff were recognized for performance in team meetings. The Finance Department continued to pursue new technology, including implementation of SharePoint and a new payroll system, and converted more processes to a paperless environment with robust internal controls. The Senior Policy Analyst facilitated a multi-departmental workgroup, Reimagining Work, to plan for the future of work at EHA based on insights gained during the time staff have been working remotely during the COVID pandemic.
EHA will establish a culture of appreciation by: • Ensuring that all staff and teams have clearly defined goals and objectives and the means to monitor progress towards those goals and objectives. • Regularly recognizing the achievement of individual and team accomplishments through a variety of means and media. • Developing a consistent performance evaluation process that is used as the basis for compensation adjustments.	The HR Director directed a collaborative effort to overhaul the agency's employee performance evaluation system. HR staff activated the "Impressions" feature in the agency's HRIS, Paylocity, as a way for staff to recognize one another's accomplishments. The Housing Choice Voucher Department's Employee performance reviews provided for 3-5 personal goals, including a goal related to diversity, equity, and inclusion. During this time of remote work due to COVID, EHA held virtual Townhall Meetings that focused on one

	department's current activities and accomplishments per meeting.
EHA will foster a culture of growth through opportunities for staff development. • All supervisors are committed to the career growth of every assigned staff. • All employees have opportunities for training and education to enhance their opportunities for advancement whether with EHA or not.	EHA provided staff the opportunity to take part in a five-session virtual training, Building Resiliency Together, provided by the Henley Leadership Group. This offered self-care and coping strategies during a time of remote work due to COVID, EHA provided staff with new E-learning opportunities through Yardi's Aspire platform.
Goal Four: The race – as well as other physical or social characteristics or sexual orientation – of any client or staff will have no impact on how they fare in EHA's programs or their potential in the organization.	
Objectives	***Progress Made in Year One (Beginning July 1, 2020)***

EHA will effect agency-wide culture shift that normalizes and prioritizes Diversity, Equity, Inclusion (DEI) as an organizational imperative.
• EHA's senior leadership will be responsible for guiding this culture shift.
  ○ Their actions and behavior will demonstrate a personal dedication to DEI.
  ○ Commitment to ongoing growth in DEI knowledge through self-study and other internal and external opportunities.
  ○ They will hold themselves, each other and assigned staff accountable for behavior that demonstrates DEI practices.
• All staff will demonstrate understanding of EHA's mission to undo institutional racism.
  ○ Staff will embody a sense of welcome and inclusion for colleagues and residents regardless of differences in physical/social/sexual orientation.
  ○ Staff will attend all required DEI training workshops and put learning outcomes into practice within agency work.
  ○ Staff will hold each other accountable for behavior that demonstrates practices of diversity, equity, and inclusion.
	The Director of DEI engaged in the following activities to normalize and prioritize DEI as an organizational imperative:
	• Established monthly 1-on-1 meetings with all members of senior staff team in order to review monthly progress of assigned DEI tasks/metrics and to hold accountability for senior leadership DEI commitments.
	• Educated EHA staff through a combination of external trainers and in-house training on critical topics such as institutional racism and microaggressions.
	• Created educational video content about DEI.
	• Created policy/process on how to respond to allegations of discrimination alongside Director of Human Resources & Administration.
	• Created hiring/retention guidance alongside Director of HR & Administration to support racial equity goals.
	• Piloted process of accounting for DEI metrics in annual review process for senior staff.
	• Created anti-racist tenant policy alongside cross-departmental team of EHA staff
	• Completed Leadership Snohomish County's Leadership for Racial Equity cohort by Director of DEI: learned critical skills and knowledge to apply to EHA racial equity commitments.
	• Delivered DEI trainings for AWHA (Association of Washington Housing Authorities).

• DEI will provide the conceptual lens for all EHA program and policy development and implementation.
  ○ Regularly updated demographic and other DEI-related data will drive the development of programs, policies and procedures.
  ○ Human resources programs and policies will be implemented to create and sustain a racially inclusive organization.
  ○ All operational programs and policies will be examined and become consistent with the characteristics of such an organization.
• Develop and nurture community and national networks and relationships to advance diversity, equity, and inclusion at all levels.
  ○ Participate in local neighborhood associations and councils to build local relationships and counteract NIMBYism.
  ○ Partner with and/or join key organizations such as NAHRO, GARE, C3, and Leadership Snohomish, to amplify and enhance DEI effectiveness.
  ○ Consult with and learn from local cultural affinity organizations about the diverse needs of Snohomish County and to ensure equity in program development and implementation.
	• Participated in NAHRO's DEI committee and served as a member of GARE (Governmental Alliance on Race and Equity).
	
	The Human Resources Department (HR) worked with the Director of DEI to develop programs and policies aimed at creating and sustaining a racially inclusive organization.
	
	HR focused on the concept of inclusion as part of its ongoing efforts to revise and update EHA's Personnel Policy manual.
	
	HR began to review, evaluate, and revise a prioritized list of other HR policies and procedures to eliminate any remnants of institutionalized racism.

Resident Advisory Board Comments on Proposed Annual Plan

Everett Housing Authority held a meeting of the Resident Advisory Board (RAB) on Wednesday, December 9, 2020, to receive comments and recommendations to assist with the development of its FY 2021-22 Annual Plan. This meeting took place via Zoom videoconference as an emergency measure to decrease the spread of the COVID-19 coronavirus, in keeping with Snohomish County's Phase 2 restrictions on public gatherings. Residents and program participants who attended this meeting were appointed to the RAB.

The following RAB members attended the meeting:

Bakerview (RAD PBV program): Tracy Turner, Angele Russell-Knox, Peg Dayton

Broadway Plaza (PBV program): Risa Meinke, Pedro Reyes, Catherine Holdsworth, Peggy Holmgren, Elizabeth Ramstad, Judy Bolder, George Grewing

Pineview (RAD PBV program): Cherokee Screechowl

Tenant Based Voucher Program: Natosha Donaldson, Chenier Leaks, Leonor Selvidge

RAB Comments:

Although the RAB did not propose any policy initiatives or suggested activities to include in the Annual Plan, RAB members posed several questions after a presentation by EHA staff. These questions and staff responses are summarized below.

- A RAB member living in a RAD PBV development wondered when she would receive a regular Housing Choice Voucher, as she has been on the waitlist for quite some time. HCV Program Director Wendy Westby responded that tenants of Project-Based units are eligible for a regular Voucher after 12 months of tenancy if the Housing Authority has regular Vouchers available, which hasn't been the case since April 2019. Director Westby did not think this situation would change in 2021, unless HUD provides the Housing Authority with additional Vouchers. She clarified that tenants of PBV units who want to move are placed on an "interest list" and will be issued a regular Voucher ahead of applicants on the HCV waiting list at the point regular Vouchers become available.

- A RAB member wondered where things stood with EHA's plans to create a new program for the homeless, an initiative that was announced at last December's RAB meeting. HCV Program Director Wendy Westby recalled that around the time of last year's meeting EHA had applied to HUD for Mainstream Vouchers, which are designated for non-elderly households (single persons or families with children) that include disabled family member, and who qualify for a local preference: i.e., homeless or rent-burdened (paying 50%+ income toward rent and utilities). Director Westby said EHA has received 78 Mainstream Vouchers to date, and HUD will issue an additional 75 Mainstream Vouchers in March 2021. She was proud of her team's efforts in leasing up 48 of the

Mainstream Vouchers issued to date, especially given the challenges of remote work posed by COVID.

- A RAB member expressed her appreciation for EHA's DEI program and wondered how the agency will go about identifying issues related to diversity, equity, and inclusion. DEI Director Tony Nabors said this will be done through data collection (e.g., the demographics of our residents and staff), and also by providing more opportunities to hear from residents and the wider community about the issues that affect them though surveys, meetings (including the RAB), and conversations.

- A RAB member wondered if COVID has presented barriers for the HCV Department in doing its work, the lease-up process in particular. HCV Director Wendy Westby said the shift to remote work has changed the way her department does business without impacting it negatively. For example, in-person briefings are now done via Zoom or telephone, and her staff has found other creative ways to provide Voucher holders with the information they need to find a unit. She further noted that the Voucher Department's eligibility team has been providing some additional supports, such as "warm" referrals to sources that can assist with deposits and biweekly check ins with clients who are looking for units. Director Westby said the average time for a Voucher holder to find a unit and lease up has been cut from 82 days to 60 days, well below the 180-day period a Voucher can be used.

- A RAB member asked about potential homeownership programs offered by EHA, including one allowing a person to own the home but not the land. HCV Director Wendy Westby said EHA's FSS Coordinator is working on some new homeownership opportunities, but there was nothing to announce or report on at this time with respect to that. She further noted that EHA participates in an HCV homeownership program, but it has been several years since it had the capacity to take on new applicants, and she did not foresee this situation changing in the near future. She was also aware that Housing Hope administers some homeownership programs.

- A RAB member asked if the units that will be constructed on a portion of the Baker Heights neighborhood through Everett Housing Legacy will include units for people with disabilities. HCV Director Wendy Westby noted that a certain percentage of newly built units are required to be ADA accessible. The RAB member followed up with a concern that it is hard to find a place that rents to younger people with disabilities, and Director Westby responded that EHA is aware of this need and is committed to creating more units for disabled or elderly people, although there were no specific projects in the pipeline at this time that she was aware of.

<u>Other Comments on Proposed Annual Plan</u>

EHA received no comments on its proposed Annual Plan during the 45 day public review period. At a public hearing on the Plan, which was held as part of the February 22, 2021 Board of Commissioners meeting, Delta Neighborhood Chair Ryan Weber provided the following questions and comments on behalf of that organization, with respect to EHA's future redevelopment plans for the Baker Heights neighborhood, which is located within the Delta Neighborhood of Everett.

"What is the potential for development of the area as a Choice Neighborhood? Does this mean possible acquisition of additional properties in Delta? Does this bring additional grant funds? Does this raise zoning density or building heights in the area? We are unclear what designating the area as a Choice Neighborhood represents so we would appreciate some clarity on that.

Our concern regards the 2.5 acres adjacent to Wiggums Hollow Park. An MOU with Parks has existed for decades since the former ballfield was donated decades ago. Parks has spent considerable resources in maintaining this land as a park so we are concerned this land may be sold to a developer and our community park truncated. Notably Delta lost 1.5 acres of Jackson Park and public mountain views last year. The sale of this land would represent the second time the neighborhood has lost park land in 2 years.

I have requested the estimated property value for the land adjacent to Wiggums Hollow which I am asking for again today. This will be useful in our efforts to save our neighborhood park.

We look forward to working with you on these questions and concerns. Also excited for the upcoming planning sessions with GGLO [the architectural firm tasked with creating a Master Plan for the site] *starting tomorrow."*

EHA's Executive Director Ashley Lommers-Johnson provided the following written response to the Delta Neighborhood's comments and concerns as presented by Mr. Weber:

"The Choice Neighborhoods Initiative is a HUD grant program to fund the transformation of a neighborhood, which is broader than just Baker Heights. This is a highly competitive grant program that provides up to $35 million in funds to redevelop a distressed public housing property and the area that it is in as part of a neighborhood transformation initiative.

EHA may have an opportunity to apply for a CNI grant later in 2021 or in 2022. The master planning initiative may result in a plan that could become part of a CNI transformation plan.

With respect to the 2.6 acres that is currently part of Wiggums Park, it is public housing property (part of Baker Heights). HUD has approved the sale of Baker Heights, including the 2.6 acres. None of the acreage can be sold for less than Fair Market Value unless its future use is affordable housing. While it is EHA's desire to keep the 2.6 acres as part of Wiggums Park, we have to get the equivalent of FMV for the property.

We do not have a current appraisal for the 2.6 acres, but it is well in excess of $2.5 million. To give perspective on land value in Everett, EHA is currently acquiring a one-acre site of $3 million. We want to use the Baker Heights site for mixed-income housing or to use proceeds from sale of part of the site to buy land for housing. Therefore, we must dispose of the 2.6 acres at Fair Market Value or receive equivalent value in order for EHA to fulfill its mission to provide affordable housing in Everett.

We are working with the City of Everett to find ways to preserve the park as well as acquire property to develop replacement housing for Baker Heights. I trust that you will do your part in supporting EHA's efforts to provide affordable housing throughout Everett in all neighborhoods."

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Section B.3 of Form HUD

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Julie Willie, the Community Development Director
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

Housing Authority of the City of Everett
PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of Impediments (AI) to Fair Housing Choice of the

City of Everett, WA
Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State Consolidated Plan and the AI.

Consistency areas include achieving affordable housing choices for low/moderate income households, rehabilitating existing PHA controlled housing, maximizing HCV and PBV, and replacement housing. Other areas of consistency center on the provision of services through EHA's commitment to improve the living environment of its housing participants and the ongoing redevelopment of Baker Heights.

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

Name of Authorized Official	Title
Julie Willie	Community Development Director
Signature: Julie Willie	Date: 3-8-2021

form **HUD-50077-SL** (12/2014)