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February 13, 2024

VIA EMAIL

Colette Pollard, Reports Management Officer
Department of Housing and Urban Development
451 7th Street SW, Room 8210
Washington, DC 20410-0500

**RE: 60-Day Notice of Proposed Information Collection: Moving to Work
Demonstration; OMB Control No.: 2577-0216**

To Whom It May Concern:

The King County Housing Authority (KCHA) welcomes the opportunity to submit comments on HUD's proposed revisions to Form 50900, which is used to outline the annual planning and reporting requirements for the initial agencies participating in HUD's Moving to Work (MTW) demonstration. KCHA is in support of the revisions to Form 50900 that will streamline the reporting process, but we do urge HUD remove concerning language from the Certificate of Compliance.

The existing Form 50900 requires MTW agencies to select standard metrics for approved activities, identify a benchmark and track changes against a baseline. As currently utilized, the standard metrics often fall short of accurately portraying the full impact of an activity. In some cases, the metrics are not meaningful to internal staff or external partners. KCHA generally supports the elimination of the standard metrics and appreciates the option to provide self-reported PHA data alongside voluntary qualitative narratives. The proposed modifications better align with MTW flexibilities, and will allow agencies to tell their MTW story in a more meaningful way.

We are grateful for the time that HUD has taken to collaborate with the initial 39 MTW agencies on developing alternatives to the standard metrics. We encourage continued cooperation and discussion to determine appropriate and mutually beneficial data and metrics that can be pulled through required HUD systems or reported by MTW agencies. Data without context and input from MTW agencies will not be demonstrative of MTW activity-based outcomes, especially

without historical data to truly track changes.

KCHA also endorses the comments submitted by the Moving to Work Collaborative, and we wish to specifically support and reiterate their concerns regarding the proposed changes to the Certifications of Compliance. The Certification of Compliance is legally binding and false statements are subject to criminal and/or civil penalties. Given the variance in AFFH actions taken by jurisdictions around the country, and the likelihood that reasonable individuals could disagree as to whether a particular action is in compliance with an AFFH goal, we strongly urge HUD to make changes to the proposed language in section 6 and 7 of the proposed Certifications of Compliance.

We look forward to continuing to work in partnership with HUD to create a 50900 Form that facilitates information sharing and truly speaks to the effectiveness and innovation of the Moving to Work program.

Thank you for the opportunity to provide comment on the proposed revisions to Form 50900 and your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Andrew Calkins", is positioned above the printed name.

Andrew Calkins

Vice President of Policy & Intergovernmental Affairs