

Washington Village South Norwalk, Connecticut



Relocation Plan

September 20, 2016

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I. PURPOSE OF THE RELOCATION PLAN

The Relocation Plan sets forth the specific policies, procedures and benefits that will govern the relocation of Washington Village families. This plan is written in accordance with the relevant provisions of the 49 CFR 24.2, HUD Handbook 1378--the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the URA), 42 U.S.C. Section 4601 et seq., Section 135 of the Connecticut General Statutes Department of Economic and Community Development: Uniform Relocation Assistance Act, Sec 8-266 et seq. and Section 104(d) of the Housing and Community Development Act (104 (d)) and its implementing regulations at 24 CFR Part 42.

The underlying objective of this plan is to ensure persons affected by this project are treated fairly, consistently and equitably so that they will not suffer disproportionate hardships as a direct result of activities designed for the benefit of the residents as a whole. Norwalk Housing Authority (NHA) will ensure that Washington Village residents can continue to live in affordable housing that meets their housing needs throughout the relocation process, will strive to minimize the negative impacts of relocation to the greatest extent possible and will make certain that residents are made whole for eligible costs under governing federal and state relocation regulations.

The Washington Village relocation plan is based upon a number of important goals:

1. To provide individualized counseling and support before, during and after initial relocation to educate residents about the range of options available to them, and accommodate household priorities and preferences.
2. To optimize relocation options and accommodate resident preferences whenever possible.
3. To ensure housing costs are affordable and functionally equivalent to the original unit, adequate in size to accommodate legal occupants and meets the standard of decent, safe and sanitary housing.
4. To minimize the displacement of families during redevelopment through the phasing of construction and relocation.
5. To minimize the disruption and negative impacts of relocation through comprehensive and coordinated supports.
6. To maximize the number of original Washington Village residents in the newly developed units.
7. To reimburse all allowable resident costs under the URA and 104(d).
8. To support residents through the physical and psychological aspects of moving.

9. To establish fair and equitable priorities to govern the order in which households are given choices about their relocation and re-occupancy as well as the timing of their moves.

II. PROJECT SUMMARY

The Norwalk Housing Authority is undertaking the redevelopment of the Washington Village Housing Development located at Raymond and Day Streets, Norwalk, CT 06854 (See *Appendix A: Site Map*). The plan for Washington Village involves the demolition of the current 136 public housing units using deconstruction techniques and replacing all 136 public housing units in a three-phase mixed income development along with an additional 137 non-public housing units (67 Low-Income Housing Tax Credit (LIHTC) units and 70 market rate units).

A. Redevelopment Unit Mix

See chart below for breakdown of units by bedroom size and unit type.

BR SIZE	PH	LIHTC	Market
1BR	31	25	39
2BR	70	42	31
3BR	31	0	0
4BR	4	0	0
TOTAL	136	67	70
%	49.8%	24.5%	25.6%

B. Funding Sources for Redevelopment

Anticipated and/or secured sources of funding for the Washington Village redevelopment project include HUD Choice Neighborhood Implementation (CNI) funds, tax credit equity, first mortgage loan proceeds, State Brownfields remediation funds and Sandy CDBG-Disaster Recovery funds.

C. Relocation Needs Summary

Of the 135 households living at Washington Village on September 1, 2016, 35 require one-bedroom, 70 require two-bedroom and 30 require three-bedroom units. There are 30 elderly households and 106 non-elderly households; 24 disabled and 112 non-disabled. To date, one hundred twenty-eight (128) households have expressed their relocation preference. Thirty-eight percent (38%) indicated their relocation preference to be relocating off-site with a Section 8 voucher; 25% indicated a preference for pursuing homeownership. Moreover, 44% stated that they would like to return to the redeveloped Washington Village.

D. Relocation Phasing Summary

In order to minimize disruption to the residents, the demolition and construction will occur in three phases. Phase 1 will be built on the vacant City-owned parcels just north of the Washington Village site. It will be constructed prior to the first phase of demolition to provide a relocation resource for Washington Village residents and enable some families to move once, into a new unit without ever having to relocate off-site. Phases 2 and 3 will occur on the existing Washington Village site. A detailed demolition and construction

schedule, include dates for occupancy, is still being fine-tuned by the development team and will be communicated, as dates are solidified.

The chart below summarizes the Washington Village unit mix and phasing plan.

	PH	LIHTC	MKT	TOTAL	%
PHASE ONE					
Building A					
1BR	0	0	0	0	0%
2BR	0	3	0	3	30%
3BR	3	0	0	3	30%
4BR	4	0	0	4	40%
Total	7	3	0	10	100%
%	70%	30%	0%	100%	<u>12.5%</u>
Building B					
1BR	12	5	10	27	38.6%
2BR	16	10	12	38	54.3%
3BR	5	0	0	5	7.1%
Total	33	15	22	70	100%
%	47.1%	21.4%	31.4%	100%	<u>87.5%</u>
Phase One Total					
1BR	12	5	10	27	38.6%
2BR	16	13	12	41	51.3%
3BR	8	0	0	8	10%
4BR	4	0	0	4	5%
Total	40	18	22	80	100%
%	50%	22.5%	27.5%	100%	<u>100%</u>
PHASE TWO					
Building C					
1BR	11	9	13	33	38.8%
2BR	26	12	10	48	56.5%
3BR	4	0	0	4	4.7%
Total	41	21	23	85	100%
%	48.2%	24.7%	27.1%	100%	<u>100%</u>
PHASE THREE					
Building D					
1BR	0	0	2	2	4%
2BR	18	15	6	39	78%
3BR	9	0	0	9	18%
Total	27	15	8	50	100%
%	54%	30%	16%	100%	<u>46.3%</u>
Building E					
1BR	8	11	14	33	56.9%
2BR	10	2	3	15	25.9%
3BR	10	0	0	10	17.2%
Total	28	13	17	58	100%
%	48.3%	22.4%	29.3%	100%	<u>53.7%</u>
Phase Three Total					
1BR	8	11	16	35	32.4%
2BR	28	17	9	54	50%
3BR	19	0	0	19	17.6%
Total	55	28	25	108	100%
%	50.9%	25.9%	23.1%	100%	<u>100%</u>

E. Relocation Services Provider

NHA has contracted with Housing Opportunities Unlimited (HOU), to provide comprehensive case management and relocation services to the residents of Washington Village who must move due to redevelopment of the property. HOU has over thirty-five years of experience providing relocation planning and implementation services, case management and resident services to the residents of over 150 assisted housing developments nationwide. The Washington Village HOU team includes a Relocation Coordinator and Outreach Worker, referred to as the Relocation Staff, which will work collaboratively with the Case Management Staff (Three Case Managers and a Workforce Development Specialist) to ensure the relocation needs of all Washington Village residents are addressed.

III. ELIGIBILITY FOR RELOCATION ASSISTANCE

A. Eligible Households

Any household who lived at Washington Village at the time the General Information Notice (GIN) was issued on September 8, 2014 is an affected resident. See *Appendices B, Relocation Notices*. The following provides more detail regarding the categories of **Eligible Households**:

1. Displaced Persons

Residents who must move away from their current Washington Village unit permanently (defined as a period longer than one year) are considered Displaced Persons under the Washington Village Relocation Plan and eligible for full relocation benefits.

2. Residents who move into Washington Village after Issuance of General Information Notice (GIN)

Residents who have moved into Washington Village after the General Information Notice (GIN) (see *Appendix B*) was issued on September 8, 2014, received notification that they are not considered displaced persons according to the URA and therefore NHA is not required to provide them with URA or 104(d) relocation benefits, See *Appendix B* for *Move-in Notice*. However, NHA has decided to voluntarily extend full relocation benefits to this group per *Section IV. Relocation Assistance*, resources permitting.

B. Ineligible Households

The following are considered **Ineligible Households**, who will not be eligible for relocation assistance and benefits in Phase 1:

1. Persons Not Displaced

Since the demolition will be phased, only residents living in the area of the site designated for imminent demolition will be issued a Notice of Eligibility entitling them to full relocation benefits. Those households who live in a unit designated for a later phase of demolition will be issued a Notice of Non-Displacement (See *Appendix B, Relocation Notices*).

2. Transfers for Reasons not Related to the Redevelopment

Residents who transfer for reasons not related to the redevelopment will be subject to NHA's existing rules for transfers and will only be eligible for moving and related services in accordance with NHA's Admissions and Continued Occupancy Plan (ACOP).

3. Early Movers who Voluntarily Move prior to Issuance of Notice of Eligibility

During the redevelopment period, some residents may transfer within Washington Village or to another Norwalk Housing Authority community for routine reasons unrelated to relocation (i.e., approved reasonable accommodation request, right-sizing of an under/over-housing situation, unit inhabitability, etc.). These moves could be by the request of the resident or by the request of NHA. Transfers unrelated to the redevelopment do not qualify a resident as a "Displaced Person" and will not result in eligibility for relocation benefits. NHA will clearly document the reason for a resident move when it is not subject to the URA. However, these "early movers" will be eligible for case management services provided as part of the Choice Neighborhoods Initiative and will have the right to move back to the new Washington Village community after it has been reconstructed, so long as they remain Lease Compliant. See *Appendix B, Relocation Notices for Notice of Right to Return & Notice of Right to Access Program Services*.

4. Evictions

Any Displaced Person who is evicted for cause from Washington Village will no longer be entitled to relocation assistance. A household's eligibility for relocation assistance will not be a factor in any decision to proceed with eviction. Until the household has been evicted or received formal notice of a judgment for eviction, they will be entitled to relocation assistance. Relocation options for a household with pending eviction action will be limited to a transfer to other NHA public housing unit under a *Use and Occupancy Agreement*, rather than a lease. If a judgment for eviction is entered, the household will not be Lease Compliant and therefore not eligible to return to the redeveloped Washington Village. Residents may avail themselves of the appeals and grievance processes described in *Section VII* of this Relocation Plan and in NHA's ACOP.

5. Ineligible Non-Citizens/Undocumented Immigration Status

Households with members that have undocumented immigration status are not eligible for full relocation benefits. If a household member is not eligible for relocation assistance under this section, NHA will pro-rate relocation assistance to the household by counting only those members who are lawful residents. For example, if there are three lawful residents in a four-person household, the household would be entitled to three-quarters of the total relocation benefit. Under the hardship policy (see *Hardship Exception* below), NHA may count an unlawful resident as a member of the household for relocation purposes only if the household can demonstrate to NHA's satisfaction that his or her exclusion would cause exceptional and unusual hardship to his or her spouse, parent or child who is a lawful resident.

6. Household Members Added to Lease After Issuance of Notice of Eligibility

Approved lease additions will be limited to marriage, adoption or birth and will be subject to the current NHA screening process during the relocation process.

IV. RELOCATION ASSISTANCE

A. Comparable Replacement Unit

The URA requires that displaced residents be offered at least one comparable replacement unit, which will be identified in the Ninety-Day Notice (See *Appendix B Relocation Notices* and *V. Overview of Process and Procedures* section for more information). The Relocation Program at Washington Village will offer each household one comparable replacement unit that will be:

- decent, safe and sanitary
- functionally equivalent to (and equal or better than) the resident's present unit
- adequate in size for the household,
- currently available for rent,
- within the financial means of the displaced household
- reasonably accessible to resident's place of employment,
- generally as well located with respect to public and commercial facilities,
- not subject to unreasonable adverse environmental conditions and
- available to all persons regardless of race, color, religion, sex or national origin or other protected classes

1. *Decent, Safe and Sanitary Housing*

Decent, safe and sanitary housing is housing that meets the requirements of Housing Quality Standards (HQS), detailed in 24 CFR 982.401, and includes housing that:

- meets applicable housing and occupancy requirements,
- is structurally sound, weather tight and in good repair,
- contains a safe, adequate electrical wiring system,
- has adequate living space for the occupants, has a kitchen with a sink, hot and cold running water and connections for a stove and refrigerator
- has a separate, complete bathroom with hot and cold running water,
- has heating as required by climatic conditions,
- has an unobstructed exit to safe, open space at ground level,
- meets standards protecting occupants from lead-based paint hazards,
- (if you are a person with a disability), is free of any barriers which would preclude your reasonable use of the unit

B. Relocation Options

The following relocation options will be available to all Washington Village residents relocated due to redevelopment. NHA will attempt to accommodate household preference but cannot guarantee a specific unit type to any household. Established priorities will be used when more households want a given type of unit than there are units available.

1. *Moving directly to a redeveloped unit.* As development will be phased, original residents living in units scheduled for imminent demolition will be prioritized for re-occupancy assignments for newly built units over those living in other phases.
2. *Housing Choice Voucher Program (HCVP).* As part of its FY2013 CNI Application, NHA has requested a total of 94 vouchers for the Washington Village redevelopment project. For households interested in relocating with a Section 8 mobile voucher, HOU Relocation staff will assist families in their search for voucher-eligible housing. In

addition to meeting HQS requirements, a private market unit must meet the voucher payment standards established by NHA through Fair Market Rents (FMRs) or gross rent estimates that include the cost of rent plus all utilities. In order to increase housing choices and de-concentration, NHA has a two-tiered payment standard, which is based upon census tract data in Norwalk. See below for the two-tiered payment standards effective 4/15/16

LOW & MODERATE INCOME CENSUS TRACT: 432, 434, 437, 438, 440, 441, 442, 444, 445

0 Bedroom	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
\$1,255	\$1,425	\$1,720	\$2,206	\$2,805

MIDDLE 7 UPPER INCOME CENSUS TRACT: 425, 426, 427, 428, 429, 430, 431, 433, 435, 436, 439, 443, 446

0 Bedroom	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
\$1,329	\$1,648	\$2,099	\$2,638	\$3,085

HOU staff will conduct regular housing searches to identify currently available units in the private sector as well as utilize Go Section 8 to find units currently available for rental with a voucher. HOU will be responsible for maintaining a regularly updated inventory of available listings that contains both NHA-provided and HOU-identified private market housing stock. HOU will also conduct periodic workshops to assist families in finding replacement housing and will provide intensive relocation counseling to every family.

Housing Choice Voucher holders will have an initial period of 60 days after the Voucher is issued to locate a safe, decent and comparable unit. During this initial period, residents will be encouraged to be proactive in searching for housing. HOU will work diligently to assist voucher holders with identifying comparable units and locating prospective landlords. The initial 60-day period of the voucher may be extended for up to 30 days for good cause as determined by NHA and based only upon a recommendation for an extension from HOU’s Relocation Coordinator. Residents utilizing a HCV must vacate their public housing unit one-day sooner as required by HUD regulations.

In order to ensure that all households are relocated in a timely manner, any household that has not been successful in identifying a unit eligible for lease-up under the Section 8 program when their Ninety-Day Notice expires, will be required to relocate via a public housing transfer to the first unit offered that accommodates their family composition.

A household being relocated from a unit subsidized under one program to a unit subsidized under another program (i.e., a public housing unit to HCVP) will be subject to the occupancy standards of that program, in conjunction with family size and composition at the time of displacement and therefore may be entitled to either a larger or smaller unit than the one previously occupied.

3. ***Transfer to another public housing unit within the NHA portfolio, including on-site transfers.*** Households will have the option of relocating to a vacant on-site unit temporarily or a public housing unit in another NHA development, as vacancies arise. As

displaced persons, these households will have “super-priority” status and, therefore, be offered units before other NHA transfers or new applicants, with the exception of domestic violence victims or other emergencies. The temporary on-site relocation option will only be available to residents in the first or second phase of relocation.

4. **Private Sector housing with a Replacement Housing Payment (RHP).** A family who may be found ineligible for a voucher and for whom there is not an available public housing unit at an NHA development may be eligible for an RHP, a monthly rental assistance payment, under the URA or Section 104(d) of the Housing and Community Development Act (HCD). At present, it is anticipated that one household whose income will preclude them from relocating with a Section 8 voucher or to another public housing unit, for whom an RHP will be required. See table below for explanation of calculation of RHP under URA vs. Section 104(d):

	URA	Section 104(d)
Monthly Rental Assistance Payment	Monthly difference between the lesser of: <ul style="list-style-type: none"> <input type="checkbox"/> Old rent/utility costs <input type="checkbox"/> 30% of gross monthly income (only if low income) <input type="checkbox"/> Welfare rent (as paid) AND Monthly rent/utility costs for the lesser of: <ul style="list-style-type: none"> ➤ comparable or ➤ decent, safe and sanitary replacement dwelling occupied 	Monthly difference between Total Tenant Payment (TTP), the greater of <ul style="list-style-type: none"> <input type="checkbox"/> 30% of adjusted monthly income; <input type="checkbox"/> 10% of gross monthly income; <input type="checkbox"/> Welfare rent (as paid); <input type="checkbox"/> Minimum Rent (PHAs) AND Monthly rent/utility costs for the lesser of: <ul style="list-style-type: none"> ➤ comparable or ➤ decent, safe and sanitary replacement dwelling occupied
Rental Assistance	Payment equals 42 x monthly rental assistance payment	Payment equals 60 x monthly rental assistance payment

This payment is intended to cover any increase in the resident’s monthly housing costs over what they would pay if they had not been required to relocate from Washington Village. A resident who receives an RHP may opt to use it as down payment assistance for a home purchase. NHA can administer this RHP in installments if payments are in the form of a rent subsidy or make a lump sum payment for homeownership down payment assistance.

A resident may identify their own replacement housing, but must make sure HOU Relocation staff inspects the unit to ensure it is decent, safe, and sanitary in order to receive an RHP.

5. ***Purchasing a home.*** If a displaced household purchases a replacement dwelling, they will be entitled to down payment assistance, including incidental expenses. The down payment assistance is calculated according to the same formula used for the RHP; however, if the calculation is less than \$5,250, NHA may, at its discretion, increase the payment. Given the high cost of housing in Norwalk, NHA has decided to provide to up three households \$15,000 each for down payment assistance, resources permitting, with priority given to over income families. The full amount of down payment assistance will be available to the household on the date of their closing and only with NHA's receipt of purchase and sale documents.

C. Moving Assistance

Residents who are displaced due to the redevelopment of Washington Village are entitled to receive assistance with the physical move of their household to their relocation housing unit. Displaced residents may choose one of the following three moving assistance options listed below.

1. *Move performed free of charge to the household*

Housing Opportunities Unlimited will contract with a state-approved, licensed and insured moving company, at no cost to the household being displaced. The household will be entitled to a \$100 Dislocation Allowance and the following:

- Packing and unpacking assistance if requested, will be provided to elderly and disabled residents.
- Boxes, packing paper and tape as well as packing instructions.
- Storage of personal property for a period not to exceed 12 months, unless NHA determines that a longer period is necessary. Any items that could pose a health or safety hazard (i.e., infested furniture) will not be stored.
- Inspection for and extermination of pests prior to relocation. No furniture or belongings will be moved or stored if they are determined to be infested.
- Disconnecting, dismantling, removing, reassembling and reinstalling relocated household appliances and other personal property, including personal computer set-up, as long as they have been installed with the approval of Washington Village management and are done so in compliance with the lease.
- The replacement value of property lost, stolen or damaged in the moving process (that is not the result of the fault or negligence of the displaced person or his/her family member, agent or employee).

2. *Self-move with fixed moving cost payment*

If the household opts to move all of their belongings themselves, NHA will pay the household an amount equal to the current and applicable fixed moving expense, as published by the Federal Highway Administration. The household will not be required to provide invoices/receipts for costs to be reimbursed, as the allowance is based upon the number of rooms of furniture in the current dwelling. Any household choosing this option will be informed in advance of the amount for which they are eligible. The household will receive this payment only after the Relocation Coordinator has completed a unit inspection and determined that all belongings have been removed from the unit and it is in broom-swept condition, unless the household substantiates a hardship condition that would necessitate upfront payment of the fixed moving cost allowance. The fixed

moving expense payment schedule for the State of Connecticut (effective August 24, 2015) is as follows:

3 rooms = \$1,000	4 rooms = \$1,180	5 rooms = \$1,425
6 rooms = \$1,670	7 rooms = \$1,910	

3. Self-move with Reimbursement for Actual Reasonable Moving and Related Expenses

The household may choose to move all of their personal belongings and pay for the costs associated with the move, and NHA will reimburse them for the actual cost of all reasonable moving and related expenses. Self-move reimbursement cannot exceed the cost of a HOU moving company costs. In order to be reimbursed for this self-move, the resident must provide documentation of incurred eligible relocation expenses. Such reasonable moving and related expenses may include:

- Cost of commercial move or cost of labor and equipment to complete the move (supported by receipted bills)
- Transportation of household members and their personal property. Transportation costs for a distance beyond 50 miles are not eligible. (this may include reimbursement for personally-owned vehicles which need to be moved, at the Standard Mileage Rate established by the Internal Revenue Service (*54 cents/mile as of January 1, 2016*))
- Packing boxes
- Packing, crating, uncrating and unpacking of personal property, if needed
- Storing of personal property for a period not to exceed 12 months, unless NHA determines that a longer period is necessary. Any items that could pose a health or safety hazard (i.e., infested furniture) will not be stored.
- Disconnecting, dismantling, removing reassembling and reinstalling relocated household appliances and other personal property, including computer set-up, as long as they have been installed with the approval of Washington Village management and are done so in compliance with the lease
- Reinstallation of telephone, cable and Internet service (supported by receipts)
- Insurance coverage for the replacement value of the property in connection with the move and necessary storage
- The replacement value of property lost, stolen or damaged in the process of moving (not through the fault or negligence of the displaced person or family member) where insurance covering such loss, theft or damage is not reasonably available.
- Other reasonable moving related expenses, such as sensitive medical/adaptive equipment, furnishings and personal belongings of a live-in aide, a piano, or a greater than usual amount of items stored in the household.

To receive reimbursement for moving costs, residents must submit a claim within 18 months from the date of their move. HOU will notify residents at least 30 days in advance of the end of their eligibility to submit reimbursement requests.

D. Additional Moving Support

1. Rental Application Fees, Credit Checks and Other Reasonable/Necessary Costs Associated with Moving/Relocation

As most private landlords/management companies require a non-refundable fee to process housing applications, NHA will reimburse residents the cost of up to three rental application fees. In addition, NHA will reimburse costs of a one-time credit check for households interested in pursuing relocation with a Section 8 voucher. Residents must provide receipts for/documentation of application fees and/or credit checks in order to qualify for reimbursement. At its discretion, NHA may determine other moving/relocation costs to be reasonable and necessary.

2. ***Assistance with Security Deposits***

NHA will pay a reasonable deposit required for a household to lease a unit. As most Norwalk-area landlords require a two-month security deposit (one-month maximum for seniors), NHA will provide a maximum of two-month deposit (resources permitting). Security Deposit assistance will only be offered at the time the resident relocates from Washington Village. If the resident moves from their initial Section 8 unit to another location, standard Section 8 rules will apply and NHA will not provide another security deposit.

The full amount of the Security Deposit is and shall remain the property of NHA. The landlord will be required to place the security deposit in an interest bearing bank account and provide NHA with this bank account information. See ***Appendix C*** for sample Security Deposit forms. If the security deposit is refundable, NHA will require the landlord to return it within 30 days of the resident's vacate date.

Residents will be required to reimburse NHA for any deduction from the security deposit within thirty (30) days after their termination of tenancy. If a resident fails to reimburse NHA, they may not meet the definition of Good Standing and therefore could be denied the right to return.

If a resident relocates to another public housing unit at Washington Village or another NHA development, their existing security deposit will be carried over to the new unit. If the resident relocates with a Section 8 voucher, their security deposit will be returned to them as long as the apartment is left clean and without damages. Otherwise, deductions will be made according to their current lease agreement. Security deposit funds cannot be used to satisfy rent obligations. Tenants are responsible for all costs related to damage to the apartment.

3. ***Return Move Assistance***

Although not required by the URA or 104(d), NHA will pay moving expenses (and security deposits, if necessary) for relocated Washington Village residents who return to the redeveloped units. These residents include "original" Washington Village residents (those who lived there at the time of the CNI grant application on September 10, 2013), Washington Village residents who subsequently moved into the site and received A GIN on September 8, 2014, and those who moved after the GIN was issued but received a Move-in Notice. Residents will be provided with the services of a licensed and insured moving company (including packing and unpacking, as needed), receive packing supplies and be reimbursed for any utility reconnection fees. If there are insufficient funds, the residents who received a Move in Notice will not receive return move assistance.

E. **Relocation Advisory Services and Other Supports**

All advisory services will be provided in the household's primary language, employing interpreters and translation services, as needed. HOU Relocation staff will make themselves available through scheduled appointments and information sessions that are held on evenings and weekends to accommodate Washington Village residents who work during regular business hours. Relocation advisory services and other supports HOU will provide include the following:

1. *Relocation Community Meetings and Information Sessions*

In order to ensure that households receive sufficient information to make well informed housing decisions, HOU and NHA staff will conduct community meetings and information sessions on relocation-related topics. Topics will include the following:

- Section 8 process
- NHA transfer process
- Housing search techniques
- Understanding owner/landlord expectations
- Community resource information and how to locate additional resources
- Establishing and maintaining utilities
- Budgeting and utility conservation, including energy assistance and winterization programs
- Preparing to move
- Meeting neighbors and being a “good neighbor”
- Options for selecting schools and transitioning to new schools
- Housekeeping and home maintenance
- Stress management
- Tenant rights and responsibilities, including the importance of lease compliance

2. *Mobility Counseling*

HOU Relocation staff will conduct mobility counseling, both individually and in group sessions. Counseling shall include the following:

- Working with each household to develop a housing plan, identifying the household's desired housing choice and any potential obstacles that must be addressed to maintain lease compliance and eligibility to return to a redevelopment unit
- Informing residents about relocation assistance available to them
- Discuss relocation housing options before making a decision about their relocation housing and moving assistance preference
- Calculating relocation benefits
- Providing each family with comparable relocation options and listings of available units.
- Counseling and assisting households who are wholly/partially ineligible for relocation benefits due to immigration status
- Providing referrals for homeownership counseling
- Providing information on how to work with private landlords, comply with private leases, handle utility and maintenance problems, conduct a housing

search, and identify and respond to fair housing issues. HOU will assist residents with negotiating leases, as needed.

- Port out assistance
- Providing information about schools and working closely with families whose children may require school transfers
- Providing information about neighborhood amenities
- Providing assistance in arranging for moves, including utility disconnection and connection and completing post office “change of address forms”.
- Provide oversight of moves and assist household as needed, on moving day
- Accompanying residents to meetings, as necessary

3. *Housing Search*

Relocation staff will assist each household with all aspects of their housing search, from completing housing applications to lease signing and key pick-up. The relocation program will utilize existing NHA Go Section 8 landlord resources as well as recruit new landlords interested in participating in the NHA Section 8 program and their available apartments. Once a unit has been selected by a household, relocation staff will aid the household in completing all necessary next steps for lease-up, including the following:

- completion of application with landlord/management company
- assistance with completion and submission of Request for Tenancy Approval (RFTA) to HCV department
- communication with HCV department regarding unit inspections
- assistance with coordinating lease signing and key pick-up
- review of lease with the head-of-household
- appliance instruction/assistance
- utility hook-up/transfer assistance

For residents interested in an NHA transfer, relocation staff will work closely with NHA Admissions Specialists.

4. *Translation and Interpreter Services*

The Washington Village community has three predominant language groups: Spanish, Haitian-Creole and English. HOU Relocation staff will ensure that the residents who speak these are able to complete their relocation needs assessment, understand their relocation options, and most importantly, make informed decisions about their relocation. HOU’s current staff are fluent in these languages. The services of professional interpreters will be enlisted as needed.

5. *Transportation Assistance*

HOU staff will transport residents or provide public transportation assistance to facilitate the relocation process as needed.

6. *Coordination with Case Management*

Relocation and case management staff will work collaboratively to meet the relocation needs of Washington Village households, especially hard-to-place households or households with particularly difficult transition issues. In conjunction with case management, the Relocation Program will undertake the following:

- Facilitate school transfers and address any transportation issues that may arise due to relocation.
- Ensure relocation does not create impediments to current and/or future employment and/or educational opportunities by identifying relocation options proximate to work, school, etc.
- Assist residents with Lease Compliance requirements regarding rent and utility payment as well as home maintenance (eg. recycling requirements).
- Establish and implement a pest control program that includes educating households regarding housekeeping and pest control prior to occupancy
- Assist residents with successful transition to their relocation housing by keeping in ongoing communication with relocated residents as well as their landlords, service providers and other involved persons. HOU will send relocated residents a quarterly survey (See *Appendix D* for sample *Quarterly Relocation Survey*) to help gauge any issues in their off-site housing.

7. *Special Assistance to Elderly/Disabled*

HOU Relocation staff will provide more intensive relocation services and case management support to residents who have special needs, including seniors and disabled individuals, individuals with significant housekeeping/hoarding issues, those with reasonable accommodation needs, and those who will require assistance with packing. HOU Relocation staff will assist households requiring accommodations, such as need for handicap—accessibility, roll-in shower, first-floor unit, extra bedroom for a live-in aide etc. in completing and submitting requisite paperwork to NHA.

8. *Fair Housing Counseling and Assistance*

Relocation staff will counsel and assist any Washington Village resident who feels their rights have been violated under the Fair Housing Act. This will include completion of the online Housing Discrimination complaint form and referral to Norwalk's Fair Housing Officer.

V. OVERVIEW OF RELOCATION PROCESS AND PROCEDURES

The following outlines the relocation process and procedures that will be undertaken with households in implementing the Washington Village Relocation and Re-occupancy effort (See *Exhibit E* for flow chart depicting the relocation process for Washington Village:

A. Roles & Responsibilities

HOU's Relocation Coordinator and Project Director will work closely with the Washington Village Maintenance, NHA Operations (including Section 8 and Occupancy), and NHA Finance Department to ensure seamless, successful relocation and re-occupancy for Washington Village residents. Appropriate processes and communications protocol (i.e., formats and timelines for reporting on the progress of relocation counseling, problems and complaints and related matters) will be established well in advance of the relocation of

Washington Village residents, and NHA will ensure that the necessary resources are provided, including the following:

- Section 8 program staff will issue Housing Choice Vouchers (HCVs) and provide information, as needed, to HOU's Relocation Coordinator to aid Washington Village residents in successfully leasing up in the private market. Section 8 Program staff will participate in regular meetings with HOU Relocation staff, at which time the status of residents' Section 8 applications, briefings, Request for Tenancy Approval Forms (RFTA's), unit inspections, and lease signings will be discussed.
- Occupancy staff will communicate information regarding NHA public housing units available for relocation, processing NHA transfer applications and requests for reasonable accommodations. Admission Specialist staff will participate in regular meetings with HOU relocation staff at which time the status of transfer applications, reasonable accommodation requests, and lease signings will be discussed.
- In conjunction with the NHA Finance Department, Relocation Program staff will develop and implement process that ensures timely disbursement of relocation benefits checks to Washington Village residents.
- Redevelopment team will work closely with the relocation team to coordinate construction and planning efforts to minimize the negative impacts to residents and make the transition as smooth as possible.

B. Database Set-up

Washington Village household information will be kept current and readily available through the *Efforts to Outcomes* database that has been customized for Washington Village. Information to be tracked includes:

- Dates URA-required relocation notices sent
- Relocation preferences
- Unit offers
- Unit Inspection results
- Approved reasonable accommodations and/or need for special accommodations
- Contact log entries
- Move dates
- New Address
- Lease Compliance issues including any pending eviction actions for nonpayment or cause, housekeeping issues, etc.
- Replacement housing payments
- Moving costs
- Claims and payment information

C. Reporting

Real time information will be available for viewing by the redevelopment team through reports provided by the Relocation Program (See *Exhibit J, Sample Relocation Tracking*

Reports). These reports will track the status of each household's progress toward relocation and will be provided weekly as well as upon the request of relocation team members.

D. Relocation File Set-up

Relocation staff will set up and maintain relocation files that will contain hard copies of documents given to each affected household. These files will be maintained confidentially in a locked file cabinet and will contain, at a minimum, the following information:

- Household Relocation Needs Survey (See **Exhibit F**)
- Required relocation notices (General Information Notice, Notice of Eligibility for Relocation Assistance/Notice of Non-displacement, Move-in Notice, Notice of Right to Return & Notice of Right to Access Program Services, 90-Day Notice and 30-Day Notice) (See **Appendix B, Relocation Notices**)
- Resident contact tracking, documenting all contact with the household and all activities directly related to the relocation assistance services offered
- Housing referral forms or updated listings of public housing and comparable replacements identified and presented to the household
- Copies of referral/s to any agency resources for household members and all follow-up contacts before, during and after relocation
- Copy of Section 8 voucher (if applicable)
- Move Confirmation and Resident Responsibilities Form (See **Appendix G, Other Relocation File Forms**)
- Moving Assistance and Benefits Declaration Form (See **Appendix G, Other Relocation File Forms**)
- Notice of Intent to Vacate (See **Appendix G, Other Relocation File Forms**)
- Unit Check Out Form (See **Appendix G, Other Relocation File Forms**)
- Calculation of benefits
- Check Request Form (See **Appendix G, Other Relocation File Forms**) and copies of all relocation benefit checks issued
- Check Receipt Form (See **Appendix L, Other Relocation File Forms**)
- Copy of new lease
- Handouts/brochures/flyers/letters provided all households
- Change of address documentation
- Other documents relative to the household's relocation
- Notification of address change procedure for Admissions Specialists

Appendix H, Relocation File Checklist details all documents that are in the Relocation file.

E. Required Notices

The following are all required relocation notices. They must be individually addressed to each household, written in plain language, in the predominant languages of the resident population and must either be hand-delivered, with proof of receipt signed for by head-of-household or sent certified mail, return receipt requested.

1. General Information Notice (GIN)

The purpose of the GIN is to inform residents about the plans for redevelopment and about their potential eligibility for receiving relocation assistance under the URA. The GIN, along with HUD brochure detailing URA relocation rights, was mailed to Washington Village residents, certified, return receipt requested on September 8, 2014.

2. ***Move-Out Notice (Notice of Right to Return/Notice of Right to Access Program Services)***

Residents who have moved from a property that is slated to be redeveloped subsequent to the date on which the application for federal funding was submitted but prior to receiving the Notice of Eligibility for Relocation Assistance may be eligible to return to the redevelopment, so long as they maintain their Lease Compliant status. NHA has been sending a Move-Out Notice to these households who moved from the property since September 10, 2013, the date on which the CNI application was submitted.

3. ***Notice of Eligibility for Relocation Assistance (NOE)***

Residents who will be displaced from their original Washington Village unit will be provided with a Notice of Eligibility for Relocation Assistance (NOE) when their phase of relocation begins. This notice will provide information on residents' eligibility and advise them to make sure they seek out relocation staff prior to moving from their Washington Village unit.

4. ***Notice of Non-Displacement***

The Notice of Non-Displacement will inform households who can remain at Washington Village of their rights and of the terms and conditions of remaining at the property. As redevelopment progresses, households that were previously given a Notice of Non-displacement will subsequently receive a Notice of Eligibility for Relocation Assistance if they must move to make way for demolition of their unit.

5. ***90-Day Notice***

NHA will not require any family to move unless at least one comparable relocation unit is made available at least 90 days before the required move. Depending upon the established construction and relocation schedule, the 90-Day Notice may be part of the NOE or provided in a separate mailing.

6. ***30-Day Notice***

Any resident who is not being displaced but either temporarily relocated or moving directly to from their Washington Village unit to a redeveloped Washington Village unit will be provided with a 30-Day Notice. This notice will contain the address of the unit to which the resident is relocating as well as the date of their move.

7. ***Move-in Notice***

Any resident who moved into a Washington Village unit after September 8, 2014 received a Move-in Notice prior to signing their lease. To date, residents who have received this notice have been informed that they are moving into a unit that is expected to be demolished, that they will be required to relocate in the future and that NHA is **NOT** required to provide them with relocation assistance or benefits under the URA or Section 104(d). However, NHA plans to extend full relocation benefits to this group, (resources permitting), in order to ensure relocation proceeds in a timely manner. These households will be required to take the first unit offered that meets their family composition.

See *Appendix B, Relocation Notices* for copies of all aforementioned required notices for Washington Village.

F. Relocation Intake and Assessment

1. *Relocation Kick-off meetings*

The Relocation Program staff will hold initial relocation informational sessions that will provide an introduction to the relocation staff, an overview of the relocation process, information regarding relocation options, moving assistance and relocation benefits. Residents will be informed that they will receive relocation advisory services, including referrals to comparable public or private housing and assistance in completing relocation benefit claim forms, as needed. These meetings will occur approximately one week prior to the commencement of relocation survey administration.

2. *Relocation Survey*

Household needs and housing preference information will be collected from all Washington Village heads-of-household through one-on-one counseling sessions during which HOU staff administer relocation surveys. The relocation survey (See *Attachment F, Resident Relocation Needs Survey*) will elicit information crucial to a successful relocation, including current eligible household members and any anticipated changes to household composition; relocation housing preferences (both type and location); special needs of household members; location of service providers, employers, schools and daycare providers and presence and type of permitted pets. The information documented on the relocation survey will help relocation staff in identifying and offering the most suitable replacement housing for each household. The Relocation Survey can also be a useful tool for collecting information that can guide redevelopment planning, by including questions about desire to return to the redeveloped property, registered vehicles, etc.

G. Advisory Services and Mobility Counseling

Relocation staff will meet with each household one-on-one after the initial survey to discuss all factors that need to be considered when making a relocation choice: location of job, children's school/s, medical and service providers, family, friends, church, childcare, access to transportation, reasonable accommodation needs, lease compliance and rent payment history, credit history, permitted pets, undocumented household members, income, etc. Each household will be counseled regarding the most appropriate relocation option based upon these factors.

Households with school-aged children, reasonable accommodation needs, undocumented members, paying flat rent, elderly/disabled members, large-size households, and households who are not Lease Compliant will receive special attention. Relocation staff will work closely with case managers to ensure obstacles to relocation are addressed.

Residents will be offered a wide variety of information sessions on related-related topics (See *Relocation Advisory Services and Other Supports, Relocation Community Meetings and Information Sessions* section previous). Relocation staff will also provide residents with written materials, maps and visuals to describe available housing options. Tours of different

housing options will also be conducted. The Relocation Coordinator will convene Section 8 program information sessions in conjunction with NHA Section 8 Staff as well as bring in relevant partners to cover other relocation options, such as homeownership.

H. Identification of Comparable Units for Relocation

Once a household has determined its relocation preference, HOU Relocation staff will work closely with the household to ensure they complete all requisite steps in the application through lease-up process. The following details the key areas in which HOU Relocation staff will assist in the public housing transfer and Section 8 voucher processes:

1. *Public Housing Unit*

Relocation staff will assist interested households in completing and submitting an NHA transfer application. NHA's Occupancy Department will offer available units in accordance with household bedroom size, reasonable accommodation needs and development preferences to Washington Village households in the order in which transfer applications have been submitted. The first NHA unit offer to a household will constitute the comparable unit that will be identified in the 90-Day Notice sent to the household; 90 days from the date this notice is sent will be the earliest date that the household can be required to relocate from Washington Village. Within five months of the relocation deadline date for a particular phase, any household that has not received a unit offer (because there are no available units among their identified development preferences) will be entered into the NHA transfer system for an offer of the first available unit in the portfolio that matches their bedroom size and any reasonable accommodation needs, so that a 90-Day Notice can be issued to the household.

Once a unit offer is generated for a household, Relocation staff will contact the Admissions Specialist and the head-of-household to schedule a unit viewing. A Relocation staff person will accompany the resident on the unit viewing. The head-of-household will be required to formally accept or reject the unit in writing via NHA's *Unit Acceptance* or *Unit Refusal* forms within five business days of viewing the unit. Washington Village residents will receive at least one unit offer. Once a resident has accepted an NHA unit offer, Relocation staff will determine the date in accordance with the anticipated unit readiness date provided by the Admissions Specialist.

2. *Section 8 Units*

Residents interested in relocating with a Section 8 voucher will be provided with extensive assistance with completing their Section 8 application and submitting all required income and asset documentation. Relocation staff will be in regular communication with NHA Section 8 program staff regarding any missing paperwork as well as determining dates of briefing review for households deemed eligible for a Section 8 mobile voucher. Once a household receives their voucher, HOU will conduct extensive Section 8 unit searches via Go Section8 (NHA's online unit database), a wide variety of Internet apartment searches, and contacts with realtors and landlords in order to identify three comparable replacement dwellings. Residents will be entitled to search for 60 days with a one-time possible extension of 30 days for good cause. Residents are not required to move until their 90-Day Notice has expired.

For households interested in **porting their Section 8 voucher** out of the NHA system, including out-of-state, Relocation staff will work with NHA in assisting the household to port their vouchers.

1. Coordination of Inspections and Moves and Assistance with Lease-up

1. *Request for Tenancy Approval (RFTA)*

Once a resident has identified a Section 8 unit, Relocation staff will assist them with completing the Request for Tenancy Approval (RFTA) with the landlord and coordinating an inspection of the unit. If the unit fails the first inspection and it is unlikely that it will pass a second inspection within a reasonable amount of time (2-3 weeks), Relocation staff will encourage the resident to look for another unit and withdraw the first RFTA.

2. *Scheduling Moves*

Once a RAFA is approved for a Section 8 unit and the unit has passed inspection or a public housing unit is deemed ready for occupancy by NHA staff, the Relocation staff can coordinate the move for the resident. At this time, the resident will meet with the Relocation staff to complete relocation paperwork. The staff will confirm the resident's moving assistance choice and move date and outline the resident responsibilities for removing all belongings from the displaced unit. If the resident opts to have the contracted moving company handle their move, Relocation staff will coordinate the move (and any needed packing/unpacking assistance if needed for the elderly) with the moving company and provide the resident with packing supplies. In addition, the resident will complete a *Notice of Intent to Vacate Unit* form (See **Appendix G, Other Relocation File Forms**), notifying the current landlord of the date the resident will be vacating the displaced unit and confirming the resident's understanding of his obligations to pay rent through the move date, pay any outstanding bill due to their current landlord, remove all items from their unit and turn in their unit keys on the move date.

3. *Utility Transfers/Coordinating New Utility Service*

At this time, Relocation staff will also assist the resident with transferring utilities or establishing new utilities in the relocation unit, as needed. In order to be eligible for reimbursement of utility reconnection fees, the utility account must be in the head-of-household's name, which must appear on the bill. Residents must file all relocation claims within 18 months after the date of their move.

4. *Unit Extermination*

At least two weeks prior to relocation, a mandatory unit extermination will be conducted of each Washington Village household's unit to ensure no infestation issues are relocated with the household. Each household will receive a minimum of forty-eight hours' notice of this pest control treatment and the preparations they must undertake prior to the treatment. Households will be informed that failure to properly prepare for the pest control visit will result in a rescheduled visit, for which they will be assessed a fee.

At two weeks, one week, and one day prior to move day, the Relocation staff will meet with the resident to make sure they are packing and otherwise prepared for their upcoming move. At the one-week mark, if a household who has opted to move themselves does not appear to be sufficiently packed up, they will be required to have the moving company move them to ensure that relocation happens according to schedule. On move day, Relocation staff, will meet with the resident after they have moved to ensure there are no belongings remaining in

their unit and complete a *Unit Check Out* form with an NHA staff member (See *Appendix G, Other Relocation Forms*) attesting to this.

5. ***Lease Signing***

Relocation staff will also coordinate all aspects of lease signings with NHA for both public housing transfers and Section 8 lease-ups. For public housing transfers, Relocation staff will coordinate lease signing dates with an Admissions Specialist and Washington Village residents. For Section 8 lease-ups, relocation staff will be in frequent contact with NHA Housing Choice Voucher Specialist regarding coordinating lease signings and ensuring residents provide up-to-date income documentation. Relocation staff will accompany residents to lease signings, as needed.

J. **Relocation Benefits Reimbursement Procedure**

1. ***Relocation Check Request Process***

NHA and HOU Relocation Program staff will develop a system that ensures timely payment of relocation benefits to Washington Village residents. HOU Relocation staff will submit relocation-related check requests (See *Check Request Form in Appendix G, Other Relocation File Forms*) to NHA in accordance with a pre-determined schedule provided by the NHA. For households opting for the moving company move or self-move with fixed moving cost payment, the head-of household will receive their relocation check/s (i.e., self-move payment or dislocation allowance) upon verification by Relocation staff that they have completely moved all belongings out of their unit, as documented on *Unit Check Out Form* (See *Appendix G, Other Relocation File Forms*).

2. ***Reimbursement of Actual and related Moving Expenses, including Security Deposits and Down payment Assistance***

For reimbursement of any reasonable actual and related moving expenses, payments will be issued within 30 days following the submission of sufficient documentation to support the claim. However, advance payments may be made where they would avoid or reduce a hardship. Therefore, NHA will make security deposits available once the resident has signed a lease. The resident will be required to provide a copy of the lease to their Relocation Counselor in order to obtain this security deposit check. For households seeking down payment assistance for home purchase, the head-of household must provide a copy of the purchase and sale agreement, and NHA will then have a down payment assistance check available at the financial closing.

3. ***Reimbursement of Utility Reconnection Fees***

Relocation staff will inform residents to submit reimbursement for utility reconnection fees upon their receipt of their first utility bills in their relocation unit.

4. ***Relocation Check Receipt***

In all cases, Relocation staff will have the recipient sign a document acknowledging receipt of relocation payments (See *Appendix G, Other Relocation File Forms, Relocation Check Receipt Form*) and a copy of all relocation benefits checks will be kept in each household's relocation file.

K. **Tracking Relocated Residents**

In order to assess satisfaction with relocation as well as maintain updated contact information and keep abreast of household composition changes that could impact unit assignment in the redeveloped Washington Village, the Relocation Program will maintain regular contact with relocated residents. A primary means of tracking such changes will be through a relocation

survey that will be sent to relocated households with a self-addressed stamped envelope on a quarterly basis (See *Appendix D, Quarterly Relocation Survey*). This survey will also be helpful in identifying and targeting assistance to any residents who are having difficulty paying their rent or utility bills or complying with the housekeeping/home maintenance requirements of their lease.

VI. RE-OCCUPANCY POLICY AND PROCEDURES

A. Eligibility to Return to Redeveloped Washington Village

NHA's goal is to maximize the number of original Washington Village households that return to the newly constructed units. All "original" households living in Washington Village at the time of the CNI grant application on September 10, 2013 or those that subsequently moved into the site and received a GIN on September 8, 2014 who are or were in compliance with the lease with no eviction proceeding pending or judgment of eviction, even if they have since vacated their unit at Washington Village, shall have the opportunity to return. In addition, although not required under CNI or URA regulation, NHA will extend the opportunity to return to any Washington Village household who moved in after the GIN was issued on September 8, 2014 and was issued a Move-In Notice, so long as they are in compliance with the lease with no eviction action pending or judgment of eviction. However, those households who have been issued a Move-In Notice will only be offered a new unit after all of the "original" Washington Village residents that have been deemed eligible and want to exercise the right to return have been accommodated.

B. Lease Compliance with No Eviction Action Pending or Judgment of Eviction

Residents who are lease compliant are defined as:

- (1) Those who are current on their rent payments and otherwise in compliance with respect to the lease requirements, including those who are current with any repayment agreement or court-ordered stipulated agreement that provides for their reinstatement.
- (2) Those without a pending eviction action or a judgment of eviction for non-payment or for other "good cause", as defined in the lease/federal regulations; and
- (3) Those who are able to secure a utility account.

For residents with pending eviction actions, the resident may request an informal meeting to determine if the lease violation can or has been cured. The resident would be considered Lease Compliant if the violation is cured or can be remedied by repair or the payment of damages to NHA.

C. Priority to Returning Washington Village Residents

Residents with a right to return shall be provided a preference for occupancy of on-site or off-site Washington Village replacement units before such units are made available to any other eligible households. The tenant may also choose to retain tenant-based housing choice voucher assistance, subject to appropriations and availability provided under section 8(o) of the United States Housing Act of 1937 for relocation from properties revitalized under the Choice Neighborhoods Grant Agreement. These preferences are retained even if the resident has already received permanent relocation benefits. This preference remains available until the initial lease-up of all of the new units. Once all of

the apartments are filled, those who chose not to return will lose their priority right to return.

D. Re-Occupancy Eligibility Determination

As new units are available for occupancy, Washington Village residents (either on-site or relocated off-site) will receive notice of their right to return to the redevelopment and participate in an eligibility determination for a new unit from the management of the new Washington Village, Trinity Financial. Returning residents will undergo income certification to determine income eligibility and to establish their rent. Trinity Financial will assess residents' Lease Compliant status via a landlord reference. NHA will offer units according to income limits that apply at the time they move back. Returning residents will pay neither more nor less rent than is required under the applicable Low Income Public Housing rent policies in effect at the time of their return to Washington Village.

VII. GRIEVANCE PROCEDURES

Residents subject to relocation may request a review of any NHA determination concerning eligibility for relocation benefits, the amount of a relocation payment or the applicability of the comparable relocation unit provided as well as any denial of eligibility to return to the redeveloped Washington Village. The results of these appeals will be reported to the local Field Office of the Department of Housing and Urban Development (HUD). An appeals process for issues dealing with relocation is described below.

A. Residential Relocation Appeals

When relocation assistance is offered to a resident, Relocation staff will inform the resident of the relocation appeal procedures. A resident must file an appeal within ten (10) business days of the contested action/receipt of a written offer of relocation benefits. The appeal should be delivered in writing to the NHA Executive Director within ten (10) business days. If the resident needs help preparing the appeal, HOU Relocation staff will provide assistance. A Hearing Officer, an impartial, disinterested person appointed by the Housing Authority other than the person who made or approved the Housing Authority action under review or a subordinate of such person, will be appointed to review the complaint and may either schedule a hearing or render a decision without proceeding with the hearing if the Hearing Officer determines that the issue has been previously decided in another proceeding.

If the Hearing Officer determines that a hearing is warranted, within ten (10) business days of receipt of the written appeal, a relocation assistance dispute resolution meeting will be scheduled between the resident, the Relocation Coordinator, NHA Management and the Hearing Officer. Any person requesting an appeal shall have the opportunity to examine and to copy all documents, records and regulations that are relevant to the appeal prior to any hearing. NHA may charge a reasonable fee for copies of more than fifty (50) pages. Residents may choose a person to represent them at this meeting as well as bring other persons they deem necessary to present their appeal at their own expense. Interpreters will be provided upon request. The Hearing Officer will provide a written decision summarizing the findings of fact and specific reasons for the results within a reasonable time period. A copy of the decision shall be sent to the resident and Management, which shall retain a copy of the decision in the resident's folder. The decision of the Hearing Officer shall be binding.

B. Right to Return Appeals

Any resident who is deemed ineligible to return must receive written notification of the reason/s for their ineligibility in writing from Trinity Management, the property management entity for the redeveloped Washington Village. The resident will have an opportunity to grieve this decision and must file a written appeal with Trinity Management within ten (10) business days of receiving written notification of their ineligibility. Within ten (10) business days of receipt of the written appeal, a meeting will be scheduled between the resident, the Relocation Coordinator and Trinity Financial's Regional Property Manager. The resident may choose a person to represent them at this meeting as well as bring other persons they deem necessary to present their appeal at their own expense. Interpreters will be provided upon request. The Regional Property Manager will provide a written decision summarizing the findings of fact and specific reasons for the results within ten (10) business days. If the resident is not satisfied with the results of this appeal, he/she may file a further appeal with NHA, (See *Residential Relocation Appeals* section above).