

**Meadow Gardens  
Norwalk, CT**

*Relocation  
&  
Re-Occupancy Plan*

**July 1, 2023**

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## **I. PURPOSE OF THE RELOCATION AND REOCCUPANCY PLAN**

The Relocation Plan sets forth the specific policies, procedures and benefits that will govern the relocation of Meadow Gardens families. This plan is written in accordance with the relevant provisions of Section 18 and 24 CFR Part 970.21. 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 Meadow Gardens residents can continue to live in affordable housing that meets their housing needs throughout their relocation, 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 Meadow Gardens' Relocation Plan is based upon a number of important goals:

1. To provide support before, during and after initial relocation to educate residents about the range of options available to them and accommodate household priorities and preferences, whenever possible.
2. To optimize relocation options and accommodate resident preferences, whenever possible.
3. To ensure housing is adequate in size to accommodate legal occupants and meets the standard of decent, safe, and sanitary housing.
4. To minimize the disruption and negative impacts of relocation through comprehensive and coordinated supports.
5. To provide actual and reasonable moving costs (e.g. security deposits).
6. To provide counseling and advisory services to support residents through the physical and psychological aspects of moving.
7. 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.
8. To be in compliance with Fair Housing.

## II. PROJECT SUMMARY

The Norwalk Housing Authority and its instrumentality Sound Communities, Inc. are undertaking the redevelopment of the Meadow Gardens Public Housing Development located at 45 Meadow Street, Norwalk, CT 06854. The plan for Meadow Gardens involves the demolition of 54 public housing units and new construction of 56 affordable units over a 3-year period.

### A. Redevelopment Unit Mix

See chart below for the proposed breakdown of units by bedroom size.

<b>BR SIZE</b>	<b>Current</b>	<b>New</b>
1BR	0	5
2BR	0	15
3BR	54	29
4BR	0	7
<b>TOTAL</b>	<b>54</b>	<b>56</b>

### B. Funding Sources for Redevelopment

Anticipated and/or secured sources of funding for the Meadow Gardens demolition and redevelopment project include 4% Low Income Housing Tax Credits, Department of Housing funds, debt, grants, project-based vouchers, and Sound Communities equity.

### C. Relocation Needs Summary

NHA will right-size as many households as possible within NHA public housing units in accordance with the transfer policy found in our Administrative and Continued Occupancy Plan (ACOP). A family that refuses a transfer will still be eligible to receive a Section 8 Tenant Protection Voucher (TPV), as long as they meet eligibility requirements outlined in this Relocation Plan. An ACOP change will be made to widen the definition of good cause for refusal to include families subject to relocation. The remaining households will be provided TPVs, as long as the household meets eligibility requirements outlined in this Relocation Plan. TPVs are governed by NHA's Administrative Plan (Admin Plan) and can be utilized in the private rental market either within the City of Norwalk or in any City which has a Public Housing Authority that administers the Section 8 program.

### D. Relocation Timing Summary

Relocation will take place over approximately ten (10) months beginning Fall of 2023. Households that are over-housed at Meadow Gardens will be transferred to an appropriate size public housing apartment at another NHA property on a rolling basis as they become available. The remaining families will be moved into apartments in the private rental market utilizing a Tenant Protection Voucher. Relocation is expected to be complete by August 31, 2024.

### E. Relocation Services Provider

NHA is contracting with Judy Cohn Housing and Relocation Consultants (JCHRC) to provide comprehensive case management, mobility counseling, and relocation services to the residents

of Meadow Gardens who must move due to redevelopment of the property. JCHRC has extensive experience providing relocation planning and implementation services, case management and resident services. JCHRC will work directly with residents with on-site staff and will be supported by a NHA staff member.

### **III. ELIGIBILITY FOR TPVs and COMPREHENSIVE RELOCATION ASSISTANCE**

#### **A. TPV Eligible Households**

Any household that lives at Meadow Gardens at the time the 90 Day Notice is issued is an affected resident. The following provides more detail regarding eligibility for assistance.

##### **1. Residents Who Are Relocated After the Issuance of the 90 Day Notice**

Residents who must move out of their Meadow Gardens unit for the redevelopment will receive a 90 Day Notice before relocation begins. Residents who are in good standing will be transferred to the Section 8 program and provided with a Tenant Protection Voucher (TPV). These residents will be entitled to comprehensive relocation benefits and services and will be given the right to return to Meadow Gardens once redevelopment is completed. Being in good standing includes being up-to-date on rent and not in Legal proceedings nor on a stipulated repayment agreement.

##### **2. Residents who are “Right-Sized” After the Issuance of the 90 Day Notice**

Over-housed residents at Meadow Gardens are those who belong in a one- or two-bedroom unit. Under-housed residents at Meadow Gardens are those who belong in a four-bedroom unit. Any over-housed or under-housed resident who has not been “right-sized” before the issuance of the 90 Day Notice will have the choice to be transferred within a NHA development or receive a TPV. Those that choose to relocate with a TPV will be given a voucher for a bedroom size that meets their current occupancy needs in accordance with Section 8 guidelines.

##### **3. Household Members Added to Lease After Issuance of the 90 Day Notice**

Approved lease additions will be limited to marriage, adoption, birth, adult children returning to the home, adult family members who formerly resided in the family, children who were under split custody agreements who are now adults and wish to live with the assisted parents and minor children, including the minor children of a newly added adult family member. All will be subject to the current NHA screening process during the relocation process.

#### **B. Ineligible Households**

##### ***1. Transfers Prior to Issuance of 90 Day Notice***

Prior to the issuance of the 90 Day Notice, some residents may transfer to another Norwalk Housing Authority community for routine reasons unrelated to redevelopment and 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 in accordance with the Admissions and Continued Occupancy Plan (ACOP). These transferred residents will be provided packing materials and will be moved by a licensed and insured moving company provided by NHA. Early

movers, including the over-housed, who are transferred to another NHA development in accordance and in advance of the issuance of the 90 Day Notice will not be eligible for a TPV. However, these residents will be given the right to return to Meadow Gardens once redevelopment is completed.

## ***2. Rent Repayment Plans and Evictions***

Any household not in good standing at the time of receiving the 90 Day Notice, such as those in legal proceedings with NHA or who are on a stipulated or repayment agreement, will not be eligible for a TPV unless or until they are made whole in advance of being relocated to a public housing unit. If they are transferred to a public housing unit, they will only be eligible to return to the redevelopment if they have not been evicted and all outstanding rent balances have been repaid.

Any household evicted for cause or who has received formal notice of judgment for eviction from Meadow Gardens will not 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. If a judgment for eviction is entered, the household will not be Lease Compliant and therefore not eligible to return to the redeveloped Meadow Gardens. Residents may avail themselves of the appeals and grievance processes.

## ***3. Ineligible Non-Citizens/Undocumented Immigration Status***

Households with members that have undocumented immigration status are not eligible for full relocation benefits. Instead, NHA will pro-rate relocation assistance to the household by counting only those members who are lawful residents. NHA *may* count an unlawful resident as a member of the household for relocation purposes only if the household can demonstrate that the exclusion would cause unusual hardship to the lawful resident(s).

All Meadow Gardens residents must be relocated by August 31, 2024. If a family has been unable to utilize their Tenant Protection Voucher in the private market sixty days from this date, the family will be transferred to a public housing unit that meets their household size needs. Additionally, if a family chooses to remain in public housing and no vacancy is available for them within sixty days of this date, they will be required to relocate with the TPV. Those who are unable to lease up with the TPV will have priority to public housing vacancies.

## **IV. PRIORITIZATION & LOTTERY**

One of the goals of this plan is to establish fair and equitable priorities to govern the order in which households are given choices about their relocation. To that end, Norwalk Housing Authority has established the following guidelines.

- 1) Households living in units that have very severe health and safety concerns, as approved by the NHA Executive Director, will be given priority. These households will be placed in a lottery using NHA's housing software and a random number generator and given a number which will determine the order and timing of their relocation.

- 2) Households with elderly members (over 65 years old) and Households with members who have disabilities will be given second priority. These households will be placed in a lottery using NHA's housing software and a random number generator and given a number which will determine the order and timing of their relocation.
- 3) Remaining households who are eligible for a TPV will be entered into a lottery using NHA's housing software and a random number generator to determine the order and timing of their relocation.

Please note this prioritization is in regard to who is notified when there is an apartment available. The Norwalk Housing Authority cannot control who a landlord qualifies to rent the available apartment. Further, households may choose to search for apartments on their own time, which is encouraged and could help them relocate sooner than their lottery placement. The Relocation Service Provider will assist every household to prepare for leasing a private apartment.

## **V. RELOCATION ASSISTANCE**

### **A. Comparable Replacement Unit**

Relocation is governed by 24 CFR Part 970.21(b) which requires that displaced residents be offered comparable housing, which may include housing with reasonable accommodations for disability, if required. Residents transferring within Public Housing will be notified of a replacement unit, once available. All other households will receive a Section 8 administered Tenant Protection Voucher (TPV) which they will use to rent an apartment in the private rental market. The households who receive a TPV will be prioritized as listed in Section IV above.

The service provider will work individually with each household to find a comparable apartment. A comparable replacement unit is:

- decent, safe, and sanitary
- functionally equivalent to (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, and
- (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 Meadow Gardens’ residents relocated due to redevelopment. NHA will attempt to accommodate household preference but cannot guarantee a specific unit type to any household. The Service Provider will facilitate a housing search to identify currently available units in the private sector for rent. The Service Provider will be responsible for communicating availabilities and arranging moves.

1. **Transfer to another NHA development.** Households that are currently over-housed or under-housed will be “right-sized” to a vacant public housing unit as vacancies arise in accordance with NHA’s transfer policy as found in Chapter 12 Part II of the Administrative and Continued Occupancy Plan (ACOP). They will be given priority over those on the waiting list per Chapter 12 Part IV of the ACOP. These households will have the right to return to Meadow Gardens once the project is complete.

Additionally, there may be Meadow Gardens residents who wish to or are required to relocate to a vacant public housing unit for the duration of the redevelopment project. One reason for being required to transfer to a vacant public housing unit is being on a repayment plan.

2. **Section 8 Tenant Protection Voucher (TPV).** As part of its Section 18 application, NHA has requested a total of 54 vouchers for the Meadow Gardens redevelopment project. For households eligible to receive a TPV, the Service Provider will assist families in their search for housing. In addition to meeting HUD’s Housing Quality Standards (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-concentrate poverty, 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 12/01/22

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

0 Bedroom	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
\$1,856.00	\$2,275.00	\$2,742.00	\$3,381.00	\$3,684.00

**MIDDLE & UPPER INCOME CENSUS TRACTS: 425, 426, 427, 428, 429, 430, 431, 433, 435, 436, 439, 443, 446**

0 Bedroom	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
\$2,082.00	\$2,552.00	\$3,076.00	\$3,792.00	\$4,132.00

The Service Provider 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. The Service Provider will be responsible for maintaining a regularly updated inventory of available listings that contains both NHA-owned and private market housing stock. The Service Provider will also conduct periodic workshops to assist families in finding relocation housing and will provide intensive relocation counseling to every family.

Voucher holders will have an initial period of 60 days after the TPV is issued to locate a safe, decent and comparable unit. During this initial period, residents are encouraged to be proactive in searching for housing. The initial 60-day period may be given up to two (2) 30-day extensions for good cause as determined by NHA and when recommended by the Service Provider. Residents utilizing a TPV must vacate their public housing unit one-day sooner than the 60-day period (or 120-day period if extensions are approved) 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 within 120 days 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 Section 8 voucher unit) 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.

**C. Moving Assistance**

All residents who are relocated due to the redevelopment of Meadow Gardens are entitled to receive assistance with the physical move of their household to their relocation housing unit. Residents will be offered the following moving assistance below. Any family moving out of state will be required to do the self-move with fixed moving cost payment.

**1. Move performed free of charge to the household.** NHA will contract with a state-approved, licensed, and insured moving company at no cost to the household being relocated. The household will be entitled to a \$100 Dislocation Allowance provided as a rent deduction 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 that may not be accommodated in the relocation unit and will not be provided in the redeveloped Meadow Gardens apartments such as a washer/dryer. Any items that could pose a health or safety hazard (i.e., infested furniture) will not be stored. Stoves and refrigerators will also not be stored. Storage will be limited to a period not to exceed 12 months, unless NHA determines that a longer period is necessary.
- 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 NHA 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 with 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 service provider 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 26, 2021) is as follows:

2 rooms = \$930	3 rooms = \$1,150	4 rooms = \$1,350
5 rooms = \$1,640	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 the NHA provided moving company’s 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 (*65.5 cents/mile as of January 1, 2023*)

- 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. Storage will be limited to items already in possession that may not be accommodated in the transfer unit and will not be provided in the renovated Meadow Gardens apartments such as a washer/dryer. Stoves and refrigerators 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 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.

A household may refuse any of the above and may instead receive a moving expense allowance, determined according to a schedule established by NHA, not to exceed three hundred (\$300.00) dollars and a dislocation allowance of two hundred (\$200.00) dollars. To receive reimbursement for moving costs, residents must submit a claim within 18 months from the date of their move. The Service Provider 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 and property management companies require a non-refundable fee to process housing applications, NHA will reimburse residents the cost of up to six (6) rental application fees. In addition, NHA will reimburse costs of a one-time credit check for households which relocate with a TPV. 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. Security deposit assistance will only be offered at the time the resident relocates from Meadow Gardens. 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. 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 another NHA development, their existing security deposit will be carried over to the new unit. If the resident relocates with a TPV, their security deposit will be returned to them minus any debts owed to NHA. 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***

NHA will pay moving expenses for relocated Meadow Gardens residents who return to the redeveloped units except for those households which elected to receive the fixed moving cost payment. These residents include all households which were required to relocate either within another NHA development or with a TPV in advance of demolition. Household composition changes while relocated (such as birth of child, adoption, or marriage) will also have the right to return as long as occupancy standards are still met. 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.

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

All advisory services will be provided in the household's primary language, using interpreters and translation services, as needed. The Service Provider and NHA staff will make themselves available through scheduled appointments and information sessions that are held on evenings and weekends to accommodate residents who work during regular business hours. Appointments and information sessions will be conducted in person or with an option to participate virtually or to call in. Relocation advisory services and other support that will be provided 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, the Service Provider and NHA staff will conduct community meetings

and information sessions on relocation-related topics. All meetings and information sessions will be conducted in person with an option to participate virtually or by calling in. Topics may include, but are not limited to, 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
- Understanding your Credit Score

## 2. ***Mobility Counseling***

The Service Provider will conduct mobility counseling, both individually and in group sessions for those relocating with a TPV. 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 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. The service provider will assist residents with negotiating leases, as needed.
- Port out assistance when moving to another city
- 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 Service Provider will utilize existing NHA 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 the NHA Section 8 department
- communication with the NHA Section 8 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 who transfer to another NHA development, relocation staff will work closely with NHA Admissions Specialists.

### 4. ***Translation and Interpreter Services***

The Meadow Gardens community has three predominant language groups: Spanish, Haitian-Creole, and English. The Service Provider and NHA staff will ensure that the residents who speak these languages are able to complete their relocation needs assessment, understand their relocation options, and most importantly, make informed decisions about their relocation. NHA’s current staff are fluent in these languages. The services of professional interpreters will be enlisted as needed. The NHA also employs language line for telephonic interpretation whenever needed.

### 5. ***Relocation Case Management***

The Service Provider and NHA staff will work collaboratively to meet the relocation needs of Meadow Gardens’ households, especially hard-to-place households or households with particularly difficult transition issues. The service provider will undertake the following:

- 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.
- Facilitate school transfers and address any transportation issues that may arise due to relocation.
- Assist residents with Lease Compliance requirements regarding rent and utility payment as well as home maintenance (e.g. 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 ongoing communication with relocated residents. NHA will send resident relocated with a TPV a bi-annual survey to help gauge any issues with their off-site housing.
- Providing a Credit Workshop so residents can learn what credit scores are and how it may affect their rental application.

#### **6. *Special Assistance***

The Service Provider and NHA staff will provide more intensive relocation services and 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. The Service Provider and NHA 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.

#### **7. *Fair Housing Counseling and Assistance***

The Service Provider will counsel and assist any Meadow Gardens resident who feels their rights have been violated under the Fair Housing Act. This will include a referral to Norwalk's Fair Housing Officer.

### **VI. OVERVIEW OF RELOCATION PROCESS AND PROCEDURES**

The following outlines the relocation process and procedures that will be undertaken with households in implementing Meadow Gardens relocation and re-occupancy.

#### **A. Roles & Responsibilities**

The Service Provider and NHA's staff and Project Manager will work closely with the NHA Maintenance, NHA Operations and NHA Finance Department to ensure seamless, successful relocation and re-occupancy for Meadow Gardens 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 Meadow Gardens residents, and NHA will ensure that the necessary resources are provided, including the following:

- Admissions staff will communicate information regarding public housing units available for relocation, processing NHA transfer applications and requests for reasonable accommodations. Admissions staff will participate in regular meetings with the Service Provider and NHA 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, the Service Provider and NHA relocation staff will develop and implement process that ensures timely disbursement of security deposit checks for the voucher holders.

- 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. Reporting**

Real-time information will be available for viewing through reports provided by the Service Provider. These reports will track the status of each household's progress toward relocation and will be provided weekly as well as upon request.

## **C. Relocation File Set-up**

The Service Provider and NHA 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:

- Required relocation notices (e.g. 90 Day Notice)
- Resident contact tracking, documenting all contact with the household and all activities directly related to the relocation assistance services offered
- Housing referral forms and comparable replacements identified and presented to the household
- Move Confirmation and Resident Responsibilities Form
- Moving Assistance and Benefits Declaration Form
- Unit Check Out Form
- Calculation of benefits
- Check Request Form and copies of all relocation benefit checks issued
- Check Receipt Form
- 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

## **D. 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 by mail with return receipt requested.

### **1. *Transfer Notice***

Residents who will be right-sized will be given a transfer notice once an appropriately sized public housing apartment becomes available. Households will be given thirty (30) days to transfer into the new unit. Relocation costs will be reimbursed by NHA.

### **2. *90-Day Notice***

NHA is responsible for notifying each family residing in the development of the proposed demolition 90 days prior to the displacement date, except in cases of imminent threat to health and safety. The notice must include a statement that 1) the development will be

demolished; 2) demolition will not commence until each resident has been relocated; and 3) each family displaced will be provided comparable housing, which may include housing with reasonable accommodations for disability, if required.

## **E. Relocation Assessment**

### **1. *Relocation Kick-off meetings***

The Relocation Program staff will hold initial relocation informational sessions that will introduce 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. Meetings will be held in person with the option to participate by Zoom or telephone.

### **2. *Relocation Survey***

Household needs and housing preference information will be collected from all Meadow Gardens heads-of-household who will relocate with a TPV. Households will receive a survey which they must fill out with 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 Service Provider will meet with each head of household to discuss their survey and their individual needs. The 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.

## **F. 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. The Service

Provider will convene Section 8 program information sessions in conjunction with NHA Section 8 Staff to ensure residents understand the program.

***1. Lottery and Notice of Available Unit***

Households will be organized into four (4) groups: 1) over-housed and under-housed transfers within NHA developments to be right-sized; 2) residents who choose to move into a vacant unit in another NHA development; 3) residents with Tenant Protection Vouchers; and 4) residents required to transfer to another NHA development because they are in the process of legal proceedings with NHA or are on a stipulated or repayment agreement.

**Group 1) Over-housed and under-housed transfers:** over-housed households will be moved based on their current placement on NHA's transfer list. When a right-sized vacancy is available, NHA will send a notice to the family on the top of the list. Once that family has been transferred they will come off the list and the next family will move to the top and offered the next vacancy. This process will continue until all families on the over-housed transfer list have been right-sized. As there is currently no transfer list for the under-housed, those qualifying families will be moved based on alphabetical order. When a right-sized vacancy is available, NHA will send a notice to the first family alphabetically. Once that family has been transferred they will come off the list and the next family in alphabetical order will move to the top and offered the next vacancy. This process will continue until all under-housed families have been right-sized.

**Group 2) Voluntary movers to another NHA development:** will be placed on a transfer list based on time and date of their request to voluntarily move to another NHA development once the relocation survey has been received. As a unit becomes available, the household which is at the top of the list will be transferred first. Their name will come off the list and the next family will move to the top. This will be repeated until all families on the voluntary transfer list have been relocated. Over-housed families or families who volunteer to move to another NHA development will be required to relocate with a TPV if no vacancy will be available within sixty (60) days of scheduled demolition.

**Group 3) Movers with TPVs:** will be placed in a lottery using NHA's housing software and a random number generator and given a number. The first five (5) households on the list will be notified once an available apartment has been located by the Service Provider. Each household will be able to view the apartment and if interested submit an application. When a landlord enters into a lease with a household, that family will come off the list and remaining families will move up one spot. As apartments become available the five families at the top of the list will be notified. This process will continue until all families have been relocated. Families can search for an apartment at any time. They do not need to wait until the Service Provider identifies a vacant apartment.

**Group 4) Households on a repayment agreement, a stipulated agreement or in current legal proceedings with NHA:** will not be eligible for a TPV unless or until they are made whole. They will be relocated to a vacancy in another NHA public housing development.

## **G. Identification of Comparable Units for Relocation**

Once a household has determined its relocation preference, the Service Provider 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 the Service Provider will assist in the Section 8 voucher processes:

1. Residents who relocate with a TPV will be provided with extensive assistance with completing their Section 8 application and submitting all required income and asset documentation. The Service Provider 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, the Service Provider will conduct extensive Section 8 unit searches via Go Section8 (NHA's online unit database), various websites, and contacts with realtors and landlords in order to identify comparable replacement dwellings. Residents will be entitled to search for 60 days with up to two (2) 30-day extensions for good cause. Residents are not required to move until their 90-Day Notice has expired.
2. Once a unit has been identified as a potential unit, the Service Provider will assist the family in coordinating a time with the landlord to view the apartment and will provide assistance with public transportation as necessary.

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

## **H. Coordination of Inspections and Moves and Assistance with Lease-Up**

### ***1. Request for Tenancy Approval (RTA)***

Once a resident has identified a Section 8 unit, the Service Provider staff will assist them with completing the Request for Tenancy Approval (RFTA) with the landlord. The Service Provider will schedule an inspection of the unit with a NHA Section 8 Inspector.

Inspections must be scheduled with the landlord within two (2) business days and must be completed within five (5) business days. The inspector's report must be finalized within one (1) business day of the inspection. 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 RFTA.

### ***2. Scheduling Moves***

Once a transfer unit is deemed ready for occupancy by NHA staff or an available apartment is found on the private market for voucher holders, the Service Provider and NHA relocation staff can coordinate the move for the resident. At this time, the resident will meet with the Service Provider either in person, virtually or by phone. The staff will confirm the resident's move date and outline the resident responsibilities for removing all belongings from the unit.

### ***3. Utility Transfers/Coordinating New Utility Service***

At this time, should residents need assistance with transferring utilities or establishing new

utilities in the relocation unit, the Service Provider will be available to provide information/guidance 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, unit inspections will be conducted. Where evidence of infestation, mandatory exterminations will be conducted to ensure no infestation issues are relocated with the household. Each household will receive a minimum of forty-eight hours' notice of inspections and, if required, of 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.

#### ***5. Follow Up***

At two weeks, one week, and one day prior to move day, the Service Provider will meet with the resident to make sure they are packing and otherwise prepared for their upcoming move. On move day, the Service Provider 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. Meetings may be in person or held virtually.

#### ***6. Lease Signing***

The Service Provider will also coordinate all aspects of lease signings with NHA Section 8 staff and help ensure residents provide up-to-date income documentation. The Service Provider will accompany residents to lease signings, as needed.

### **I. Relocation Benefits Reimbursement Procedure**

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

NHA Relocation Program staff will develop a system that ensures timely payment of relocation benefits to Meadow Gardens residents. NHA Relocation staff will submit relocation-related check requests to NHA in accordance with a pre-determined schedule provided by the NHA.

#### ***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 the Service Provider in order to obtain this security deposit check.

**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. NHA may also provide a utility deposit should it be required by the utility company and where it may cause a hardship for the family. Residents will be required to provide proof of required deposit in advance of any payment. Any deposit made on behalf of the resident must be returned to NHA.

**4. *Relocation Check Receipt***

In all cases, Relocation staff will have the recipient sign a document acknowledging receipt of relocation payments and a copy of all relocation benefits checks will be kept in each household's relocation file.

**J. Resident Rights & Responsibilities**

To ensure the demolition schedule remains on track, residents relocated with a TPV will be expected to participate fully and actively in finding a replacement apartment with the assistance of the Service Provider. Expectations for resident participation, such as showing up for scheduled appointments and apartment viewings and submitting paperwork in a timely manner, will be outlined during their intake meeting with the Service Provider. If they are “no-shows” for scheduled viewings, the Service Provider will follow up with the resident within the next business day and work with the resident to ensure they meet their obligations and understand the time limits on their TPV for finding an apartment.

Residents have the right to view as many apartments as they would like, but NHA will only pay the application fee up to six (6) times. If a resident rejects at least two (2) apartments they have seen and has not leased an apartment with their TPV within the first 60 days of holding the voucher, they will be required to submit an application to the next vacancy found by the Service Provider. If residents do not show up for scheduled viewings two (2) times without good cause or if they are delinquent in submitting applications and associated paperwork without good cause and are not leased up within 60 days of August 31, 2024, residents will be relocated to a vacancy in another NHA development.

Residents who have made efforts to lease up but have been denied for various reasons, such as credit score, and are not leased up within 60 days of August 31, 2024 will be transferred to the next available vacancy at another NHA development. They will still have the right to return to Meadow Gardens.

Voluntary movers to another NHA development will be able to turn down the first vacancy offered to them. They must sign a refusal form which will indicate they understand they must move to the next vacancy offered. If no vacancy is available within sixty (60) days of August 31, 2024, they will be required to transfer with a TPV.

**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 Meadow Gardens, 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 bi-annual basis. 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.

## **VII. RE-OCCUPANCY POLICY AND PROCEDURES**

### **A. Eligibility to Return to Redeveloped Meadow Gardens**

NHA's goal is to maximize the number of Meadow Gardens households that return to the newly constructed units. All households living in Meadow Gardens at the time of the 90 Day Notice 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, or those early movers who were right-sized, shall have the opportunity to return. Those households whose family composition has changed while relocated and no longer meets the occupancy standards for Meadow Gardens will keep their TPV.

### **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 or their Section 8 landlord.

### **C. Re-Occupancy Eligibility**

As new units are available for occupancy, Meadow Gardens residents (either in public housing or relocated off-site) will receive notice of their right to return to the redevelopment. All affected residents who have not left the program voluntarily or through eviction and are in good standing have a right to return. Those households which were transferred to public housing units will be the first invited to move back.

Eligible residents can participate in a screening process for a new unit through the Meadow Gardens management company. Returning residents will undergo income certification to determine income eligibility and to establish their rent. Lease Compliance status will be assessed via a landlord reference. Tenants will have the right to refute any landlords' claim and provide any supporting evidence.

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 Meadow Gardens.

All eligible residents who have been transferred and wish to return to Meadow Gardens will be entered into a Lottery using NHA's housing software. Households will be numbered based on the outcome of the lottery. Beginning with number one (1) on the list, families will be relocated in the order of their placement on the list. Exceptions will be made on a case-by-case basis by the Executive Director so as not to create any hardships for returning households.

## **VIII. 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 Meadow Gardens. 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, NHA 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.