



Housing Authority of the City of Danbury
Relocation Assistance Plan

Adopted by HACD Board of Commissioners
September, 2006

This Relocation Plan (the Plan) sets forth policies and procedures necessary to conform to the State of Connecticut's Relocation Assistance Act and the Federal Uniform Relocation Act (46 U.S.C. Sections 4600 et seq.), and its implementing regulations (49 C.F.R. Part 24),

The Plan has been developed in accordance with the provisions of Chapter 135 of the Connecticut General Statutes. The Plan sets forth HACD's commitment to providing advisory services, moving expenses, and replacement housing payments to any displaced residents eligible for alternative replacement housing options.

HACD has prepared and will administer this Plan under the direction of and/or involvement with DECD and HUD. The Plan provides the following:

1. A general description of the Scattered Sites project/property, residential and general demographics information for the .HACD;
2. The policies and procedures that will be followed to ensure a fair and equitable relocation program consistent with applicable federal and state laws.

This Plan will be implemented by the Housing Authority of the City of Danbury and its property management staff. HACD will provide a comprehensive relocation assistance program to all households that will include:

1. Fully informing eligible former Scattered Sites residents of the nature of and procedures for obtaining relocation moving expenses, relocation advisory services and replacement housing benefits.
2. Determining the needs of each displaced household eligible for relocation assistance.
3. Maintaining and providing current information concerning Phase One and Two replacement housing and relocation alternatives.
4. Providing referrals to governmental and social service agencies, as necessary and appropriate.
5. Providing information concerning federal, state or local housing programs (or other private or governmental programs) providing assistance to displaced households.
6. Assistance in the completion of applications for relocation benefits*
7. The establishment and maintenance of a formal grievance procedure for use by displaced households seeking administrative review of the decisions with respect to relocation assistance.

Goals of Relocation

The primary goal for this Plan is to increase economic and social opportunities for families affected by relocation and for the neighborhood as a whole. To ensure the achievement of this goal, HACD will implement this relocation process in consultation with resident stakeholders and affected families. HACD's Board of Commissioners has endorsed the following core principles and is committed to their ongoing pursuit and implementation:

- Seek out and incorporate the views and preferences of affected residents as

HACD RELOCATION PROCESS

Phase I - Determination and Payment of Relocation Assistance to families including Moving Costs,

Replacement Housing Payments and Advisory Services.

URA and 135 benefits will be offered by HACD for the purpose of providing compensation to the families displaced by the NSP. These benefits are intended to reimburse these families for the moving process, by covering the cost of moving expenses and provide affordable replacement housing Phase I assistance include:

Advisory Services - Services include receipt of timely notices, explanation of assistance, referrals and other assistance to comparable housing, and referrals to social services

Moving Costs - Residents may choose either payment for actual moving and related expenses or an alternative allowance based on HUD guidelines.

Replacement Housing Payments - Replacement housing payments may take the form of cash or of rental assistance provided by a Section 8 Housing Choice voucher or public housing unit,

Phase II- Implement Replacement Housing Strategy for families Based Upon Resident Survey and Needs Assessments.

HACD will provide relocation advisory services and benefits to eligible families who have expressed an interest in purchasing the units that they currently occupy. HACD will also assist those families not returning to the site in their efforts to realize alternative replacement housing opportunities. HACDs plan will include notifying residents of URA

requirements, calculating appropriate replacement housing (URA and supplemental)
assistance payments, assisting with residents' housing search, etc.....

PROJECT ASSURANCES

The HACD is committed to providing relocation assistance to any family facing displacement. In addition, it is the intent of the HACD that:

- This Relocation Plan shall be made available to the affected residents and to other interested parties for their review.
- Relocation assistance will be provided to persons displaced who are otherwise eligible to receive benefits and who can demonstrate that they are persons who are lawfully present in the United States. Current Federal Law does not allow benefits to persons unlawfully in the United States.
- No affected resident will suffer disproportionate damages as a result of displacement.
- No eligible resident will be required to move again unless adequate replacement housing is available to the displaced person, regardless of race, color, religion, sex, or national origin. No resident will be required to relocate unless comparable, affordable replacement housing is available within the greater search area. Affordable is defined as rent payments that are within the financial means of a displaced person(s) or not more than 30% of the household's adjusted gross monthly income.
- Through relocation advisory assistance efforts, each resident will be assigned to HACD Staff who will assist the affected families through each step of the Phase One and Phase Two relocation process.
- HACD will provide additional advisory assistance as needed for those affected families who require special assistance as a result of physical or mental disabilities. Every effort will be made to relocate the resident into housing that will allow the occupants to continue to live independently.
- HACD will provide each participant with (1) a Relocation Assistance Program Brochure, which will explain all relocation assistance available to the occupant, and (2) a Letter of Entitlement, which explains the specific assistance options available to the occupant. A calculation of monetary assistance where applicable will also be provided to each residential household.
- Relocation assistance payments will be made in a timely manner. Payments to residents will be based on a HACD established Moving and Displacement Allowance schedule.
- Benefits and payments as required by the Uniform Relocation Assistance and Real Property

Acquisition Regulations for Federal and Federally Assisted Programs, which implements the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (*as amended*), and by State Regulations at Connecticut General Statutes, Chapter 135 will be provided to all eligible displaced residents.

- The HACD's relocation assistance program is adequate to provide orderly and timely relocation of all persons to be displaced.

CHAPTER 2

DESCRIPTIONS OF FAMILIES AND HOUSING OPTIONS

Definition of Displaced Persons

Several sources of information were utilized in order to collect data on Scattered Sites and the affected residents. Personal interviews will be conducted with 18 households on a voluntary basis. Household size and confidential income disclosure will be requested and utilized in the analysis of the Scattered Sites impact and projected relocation assistance costs. Information provided through this process will be verified as to accuracy of the information disclosed

Chapter 135 refers to households that must be relocated as the result of government action as "displaced persons". A "displaced person" is any person (family, individual, business, nonprofit organization or farm) *that* moves from the real property, or moves his or her personal property from the real property, permanently, as a direct result of acquisition, rehabilitation or demolition for a federal or federally assisted project. The definition of a "displaced person" excludes aliens not lawfully present in the United States,

Characteristics of Displaced Households

The survey will be designed to gather information from residents that would assist HACD in planning for the relocation process, particularly planning for the needs of residents throughout the process. The survey, which will include input from the community, will be administered in-person by HACD Staff. The majority of surveys will be conducted in residents' homes or will be completed at HACD Main Office at 2 Mill Ridge Road, Danbury Connecticut 06810.

CHAPTER 3 RELOCATION ASSISTANCE AND BENEFITS

Methodology for Determination of Relocation Assistance Benefits

The Final Relocation plan and information presented herein will be based upon the actual disposition of the subject scattered site units, HACD Staff will conduct interviews with the affected families either in English or Spanish by bilingual property managers. Inquiries and documentation gathered of the residents will include household size, family composition, income, current rent, length and type of occupancy, disabilities and health problems (if any) and, location preferences related to replacement housing.

Scattered sites displaced families are eligible for up to three types of benefits, based on income level, the cause of their displacement, and replacement housing option. Types of assistance provided in accordance with Chapter 135 benefits will include:

- **Advisory Services** - Services include receipt of timely notices, explanation of assistance, referrals and other assistance to comparable housing, and referrals to social services.
- **Moving Costs** - Resident may choose either payment for actual moving and related expenses or an alternative allowance based on the following schedule.
- **Replacement Housing Payments** - Replacement housing payments may take the form of cash and/or of rental/ homeownership assistance provided by a Section 8 Housing Choice voucher or public housing unit.

Procedures for Making Relocation Payments

- A. **Eligibility.** Relocation payments will be made to all eligible residents under the provisions of Connecticut General Statutes, Chapter 135 and the Uniform Relocation Assistance Act (46 U.S.C. Section 4600 et seq.), its implementing regulations (49 C.F.R. Part 24) and in accordance with the policies, procedures and requirements contained therein as well as any additional requirements and/or regulations of HUD or DECD.
- B. **Notification to Affected Residents.** HACD will notify, in person or by mail at the earliest possible time, all residents displaced. Relocation payment eligibility and the office where detailed information about the proposed plan will also be described in the notice to residents.

C. **Assistance in Making Claims.** Upon request of a claimant, HACD will provide assistance in the preparation of claims for relocation payments. Claim forms will be provided.

D. **Time Limit for Submission of Claims.** Claims for relocation payments must be submitted by the resident/head of household within eighteen months after approval of Relocation Plan..

Review

A. **Determining Eligibility.** The HACD will be responsible for determining the eligibility of a claim for, and the amount of, payment in accordance with State and Federal regulations and procedures. Once the final determination is made, there will be no adjustment of the amount for any reason unless an error is detected, or HACD is directed by State of Connecticut or a court, to make an adjustment as a result of a review of a claimant's grievance.

B. **Relocation Payments Documentation.** HACD will maintain in its files complete and proper documentation supporting the determination made with respect to each claim. The determination will be made or approved by the HACD, or a duly authorized designee.

C. Payment of Claims

1. All residential relocation payments will be made in accordance with the regulations, guidelines and procedure promulgated by federal and state law.
2. **Timing of Payment.** A payment will be made by HACD as promptly as possible after a claimant's eligibility has been determined. Advance payments may be made in hardship cases or as required by State law, if HACD determines such advances to be appropriate (i.e., the claimant needs money for security deposit on a replacement site),
3. **Set-Off Against Claim.** In instances where otherwise eligible claimants have unpaid financial obligation to HACD, HACD may set off these obligations against the claimant's relocation payments.
4. **Payment not to be considered as Income.** Federal and State regulations provide that relocation payments are not to be considered as income for Federal Income Tax purposes or for determining eligibility or extent of eligibility of a person under the Social Security Act or any other Federal law.

Eviction Policy

During the relocation process, affected families may be evicted only as a last resort. Eviction in no way affects the eligibility of residential households for relocation payments. HACD records will be documented to reflect the specific circumstances surrounding the eviction. Eviction shall be undertaken only for one or more of the following reasons:

- A. Failure to pay use and occupancy (rent) charges when due, or
- B. A requirement under State or local law, an emergency or health or safety situation that cannot be prevented by reasonable efforts on the part of HACD.
- C. Use of the Premises for dangerous or illegal purposes.

- D. Maintenance of a nuisance and failure to abate within a reasonable time following notice, or
- E. Material breach of the rental agreement (lease) and failure to remedy breach within thirty (30) days of notice.

Relocation Records and Reports

HACD will keep up-to-date records on the relocation of all residents. These records shall be retained for inspection and audit for a period of three (3) years following completion of the project or program or the completion of the making of relocation payments, whichever is later.

HACD will develop and also maintain a relocation record, beginning with the information secured during the first interview to assess the needs of the displaced occupant. The record shall contain all data relating to relocation of the displaced occupant, including the nature and dates of services that were provided, the type and amount of relocation payments made and the location to which those displaced are relocated, including a description and/or inspection certificate for the accommodation. HACD will hand deliver, with receipt on file, or send by certified mail, return receipt requested, the following notices required at 49 CFR Part 24.

General Information Notice (61N1)—HACD will provide to each resident the applicable/required GIN, along with a brochure that explains his/her benefits, rights, and privileges; and the moving assistance available for each type of move including right to return upon the completion of the Scattered Sites Homeownership Units.

Notice of Eligibility for Relocation Benefits HACD will prepare and provide, on the date of DECD approval or as soon as feasible thereafter, the required Notice of Eligibility for Relocation Assistance, as applicable, to each eligible resident.

Issues of Confidentiality

The confidentiality of all personal household information collected throughout the relocation and family advocacy process is of paramount concern to HACD and, thus, will be carefully maintained both throughout and beyond this relocation process. HACD staff that has access to personal household information will be required to sign confidentiality statements. Access to written household information kept in files will be limited to authorized HACD staff.

Only authorized staff and contractors will have access to the electronic databases. Any use of the data by a third party for research and evaluation purposes must have prior written approval by HACD, and any public reports will be required to preserve the confidentiality of individual households at all times.

Appeals Policy

The appeals policy will follow the standards described *in* Chapter 135. Briefly stated, the displaced household will have the right to ask for review when there is a complaint regarding any of its rights to relocation and relocation assistance, such as a determination as to eligibility, the amount of payment, or the failure to provide a comparable replacement housing referral.

CHAPTER 4. THE RELOCATION PROCESS

HACD'S relocation process has been designed to compensate displaced families for relocation in a way that minimizes resident fears and concerns about their future, and to maximize positive outcomes for individuals, families with children and affected communities. These outcomes include access to such things as better housing, jobs, health care facilities, schools and healthy neighborhoods. To achieve these desired outcomes, everyone involved in the relocation effort must understand the entire process. This chapter describes the various steps in this process and addresses the challenges associated with maximizing housing choices and opportunity.

Relocation Process

The relocation process can take anywhere from four to eighteen months, depending on many factors including: whether the resident is a renter or homeowner, the availability of an appropriate replacement home, the need to clear up credit, or title issues, etc. To make the transition to a new home as smooth as possible, the relocation processes will be closely coordinated. HACD Staff will work with residents to ensure that they understand the process, are informed decision-makers, and are completing necessary tasks.

Notifications all residents will receive notices describing the various steps in the relocation process. HACD will work closely with the Resident Leadership Council and the affected families to provide the required notices. The process began when residents receive their General information Notice, a letter that will provide each impacted household with the name and contact information for the assigned HACD Staff

Meeting with HACD Staff

Each household will meet with their HACD Property Manager who will verify all prior information provided in the initial household assessment. The assessment helped HACD identify various services that the household will need. Each family will update necessary household information for determining eligibility for benefits. At this initial meeting, an 'initial visit letter' and survey are given to the resident. HACD staff will then begins searching for comparable units, of which at least one will be located in a diverse neighborhood where housing and rentals are stable or increasing in value.

When a comparable replacement home is identified, the Notice of Eligibility for Relocation Assistance is provided in one letter. This letter outlines the maximum benefits for which the household is eligible. Residents will be informed the approximate value of their benefits before they start looking for a new home, so they know what they will be able to afford in terms of new housing.

Replacement Home Search. Working with HACD Staff, residents will carefully review their housing options (see Following section), ranging from a public housing unit or Section 8 voucher to homeownership. Once the appropriate housing option is identified (or to help make this decision), the residents can utilize the information available from the Staff to begin looking for a new home. Residents will be provided with significant relocation counseling and other assistance (including transportation) in locating and purchasing or renting a new home. Residents who wish to purchase a new home and qualified to purchase a home will work with HACD Staff or anyone else they choose -- to identify available homes, Current renters or homeowners who choose to rent will work with HACD Staff to find new rental units that meet their preferences and needs. Renters who want to purchase a home will be provided appropriate counseling and information on homebuyer financing opportunities.

The Move. HACD Staff will work with the resident to prepare for and complete the moving process. Residents who need assistance packing should inform their property managers. All rental units and/or homes must be inspected and all purchased homes must be appraised.

Continuing Support. After their move, residents will meet with HACD Staff who will connect them with services to help them adjust to their new neighborhood

Housing Options

One of the most critical decisions that households will have to make is what type of housing is most appropriate for them. HACD will attempt to maximize the number of choices that each household has and to provide adequate information and guidance about the benefits associated with each housing option. The housing options, which vary by income level and eligibility, are summarized below.

Eligible Families. Low-income households are defined as households with combined household incomes below 120% of the Area Median Income (AM1) and eligible for Section 135 relocation assistance and, if eligible, for the following housing options:

Section 8 (Housing Choice) vouchers. Section 8 vouchers provide assistance to households so they can rent housing offered by the private sector. The Section 8 voucher pays the difference between the amount a household can afford to pay for housing (approximately 30% of adjusted income) and the cost of a moderately priced, safe, and sanitary home (rental limits are established by HUD as Fair Market Rents). Because Section 8 vouchers are associated with the family rather than with the unit, they give residents a greater degree of choice in selecting a home. Section 8 voucher holders can use their voucher anywhere in the country with an established voucher program.

Public Housing Unit. Public housing units under the administration of the Housing Authority of Danbury (HACD) provide decent and safe rental housing for low-income

households, the elderly and people with disabilities. HACD has a variety of public housing units, ranging from single-family, scattered site homes to high-rise buildings for the elderly and disabled. Residency is limited to low-income households (those with incomes less than 80% of AMI). Residents in these units pay up to 30% of their adjusted income for rent.

Section 8 homeownership program. Section 8 voucher holders can participate in a homeownership program run by HACD, Current Section 8 voucher holders in the core area can participate in this program. Homeownership vouchers assist first-time homebuyers with monthly expenses associated with homeownership, such as mortgage principal and interest; mortgage insurance premium; real estate taxes; homeowner insurance and utility, maintenance and repair bills. Households interested in the Section 8 homeownership program must meet minimum income and employment requirements; must have been a voucher holder for a minimum of twelve (12) months (except for those current voucher holders and Scattered Sites residents); and must complete homeownership counseling. HACD low-income residents interested in this form of Homeowners who currently do not have a voucher should complete an application for the Section 8 program. HACD has waived the 12 months of residency requirement before conversion to for Section 8 homeownership program.

Current voucher holders will be offered the choice of continued use of the voucher (in another home) or a public housing unit. Other low-income residents who are eligible for either program will be given priority status on HACD's waiting lists for these housing resources.

All remaining households. Displaced households that currently rent their home (with the exception of current public housing tenants and Section 8 voucher holders) have the option of renting or purchasing a replacement home and are entitled to Chapter 135 benefits. Options include the following:

Private market rental. Households who choose to continue to rent may move into any unit offered on the private housing market. Depending on income level, households that choose to rent are eligible for 42 months of rental assistance up to \$4000. All rental households that relocate and continue to rent are eligible for some form of benefits.

Homeownership. Current homeowners and households that are currently renting have the option of purchasing a new home. Qualified purchasers may apply their replacement housing payments toward the purchase of their new home. Supplemental benefits are also available to encourage residents to buy in stable, diverse neighborhoods within the City of Danbury. Based on income, some households will also be eligible for affordable homeownership programs offered throughout the City and the State. HACD Staff will provide guidance and information to displaced households about the various housing options so that a resident can make a fully informed decision about the type of housing that is most appropriate for their needs.

Strategies to Promote Housing Opportunities

Experience indicates that there is a tendency for households that are relocated to find replacement units in neighborhoods that are similar to the neighborhood from which they are moving. In the City of Danbury, this could lead to residents moving into predominantly low-income and minority areas. Although this is often a resident's preference, promoting housing choice is a critical HACD goal. Nationwide, the relocation programs that have been most successful in providing choices are those that have been well thought out and have included mobility counseling as well as a strong, involved family advocacy component. HACD's Plan is well suited to achieving this goal. However, in addition to well-run relocation assistance and advisory services, HACD plans to take other steps to promote housing opportunities for relocating residents.

•Provide information about affordable housing in more diverse neighborhoods.

HACD's proposed actions include:

- Educating relocating residents about potential opportunities in more racially and/or economically diverse and stable areas. At the time the HACD Staff gives a resident his or her Entitlement Letter, the resident will also receive a list of the neighborhood profiles. Residents will be asked to indicate the neighborhoods in which they are interested and to identify any other neighborhoods in which they may have an interest

Arranging for small group tours (approximately four to six residents per tour) of neighborhoods selected by residents. In addition, HACD Staff will arrange tours on a bimonthly basis for other neighborhoods they have selected and invite residents to join these tours.

- Maintaining an on-going search for affordable units in all of the neighborhoods and compiling a database for residents. This database will be available at HACD and Staff will be responsible for keeping the information current.
- **Work with communities and landlords on welcoming relocating families by:**
 - Sending letters to community groups in each of the profiled neighborhoods describing the HACD project, benefits available to residents, family advocacy services, and referral services available to assist families with adjusting to new neighborhoods.
 - Meeting individually with landlords in diverse and stable neighborhoods to explain the HACD program and the opportunities available to them when they rent to a relocating household. These landlords will be provided with an informational packet to educate them about the Fair Housing Act as well as the assistance that will be provided to residents to enable them to succeed in their new environment.
 - Working with landlords to develop an understanding of what criteria households must demonstrate to make the landlord comfortable accepting them as residents. HACD has already met with private landlords to discuss this issue and will continue to work with landlords throughout the relocation process. On an individual basis, offering incentives to persuade landlords to rent to residents who may have difficulty leasing due

to credit history or other problems.

- ***Assist residents in addressing financial or other obstacles that prevent them from moving into private market units.*** Residents may have outstanding utility bills, which make it unfeasible for them to move into private market units that would require utility hook-up. To the extent there are households in which one or more family members have criminal histories or substance abuse problems, they will have, in all likelihood, some difficulty finding landlords who are willing to take them as tenants. Actions to address these obstacles include:
 - Identifying households with these obstacles early on in the relocation process to provide them with sufficient information and time to resolve credit issues.
 - Working with households to develop a payment plan for outstanding bills.
 - Developing programs that allow residents with criminal records to establish credibility or references that may provide landlords with a greater degree of comfort,
 - Working with household members who might have a history of substance abuse to complete treatment programs and maintain a clean record.
 - Encouraging households to split only if there is an indication that the newly formed households can succeed on their own. Staff will identify those households that may need assistance with financial training and budget planning.
- ***Outreach to families who may be reluctant to relocate to diverse neighborhoods.*** Households that must relocate typically do not want to move far from their original neighborhood because they are familiar with the services, faith-based organizations, transportation systems, employment opportunities, daycare options, etc. available in that neighborhood. Actions to address these obstacles include:
 - Providing counseling and information to familiarize households with services available in other neighborhoods.
 - Working with households to understand what they want most from their new neighborhood and what they are the most afraid of encountering in a new community.
 - Locating units in more economically and racially diverse areas that provide the elements that are most important to the relocating household (for example good schools for households with young children).
 - Searching for comparable replacement housing in diverse and stable neighborhoods and offering to take the residents to look at these comparable.

- Explaining the goal of moving to diverse and economically stable neighborhoods to the preferred realtors and lenders that HACD will be working with on this project, and any other realtors and lenders the residents may choose, and providing the realtors with the list of the City of Danbury neighborhood profiles. A list of these preferred realtors and lenders will be provided to residents.