

**Draft Rental Assistance Demonstration (RAD) Conversion – Phase I
Programmatic Resident Relocation Assistance Plan**

**Prepared For:
Cincinnati Metropolitan Housing Authority (CMHA),
a public body, corporate and politic**

Prepared By



Updated Draft - December 28, 2016
to Comply With HUD Notice H2016/17
(Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil
Rights Requirements and Relocation Requirements Applicable to RAD First
Component – Public Housing Conversions) NOTE: Changes in red throughout
updated document.

Contents

EXECUTIVE SUMMARY	3
INTRODUCTION.....	15
A. REGULATORY FRAMEWORK AND REQUIREMENT ANALYSIS	21
B. PROGRAM ASSURANCES AND STANDARDS.....	22
C. RELOCATION PLANNING AND NEEDS ASSESSMENT METHODOLOGY ...	24
D. GENERAL DEMOGRAPHICS AND OCCUPANT DATA & DESCRIPTIONS ...	26
E. RELOCATION ASSISTANCE ELIGIBILITY	30
F. REPLACEMENT HOUSING NEEDS & RESOURCES	33
G. CONCURRENT RESIDENTIAL RELOCATION.....	35
H. RELOCATION ASSISTANCE PROGRAM	36
I. PAYMENT OF RELOCATION BENEFITS.....	35
J. LAWFUL PRESENCE IN THE UNITED STATES.....	47
K. EVICTION POLICY	47
L. APPEALS POLICY	48
M. PROJECTED RELOCATION SCHEDULE AND PHASING PLAN.....	48
N. ESTIMATED RELOCATION COSTS.....	49
O. RESIDENT PARTICIPATION/PLAN REVIEW.....	49

EXECUTIVE SUMMARY

Introduction: The Cincinnati Metropolitan Housing Authority (CMHA) is undertaking the first phase of its conversion of existing Low Income Public Housing (LIPH) Units to U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) Program.

As part of Phase I, CMHA will convert 628 LIPH units. These vital assets in Phase I are dispersed over six unique sites in the City of Cincinnati (City). The City is comprised of 52 neighborhoods with their own unique character and needs. The LIPH residents are an important part of the neighborhoods they reside in. CMHA's primary goal is to ensure that the residents have quality housing available to them long-term so that they will remain a part of their neighborhoods for as long as they wish.

The manner in which the residents are supported, worked with and treated is of the utmost importance and primary concern to the CMHA. As previously stated, CMHA's RAD Program (hereinafter referred to as the Program) consists of several projects for each Phase. A critical driving project of the Program is the construction project undertaken for the major rehabilitation of the housing units. CMHA will upgrade and modernize the units and the common areas of each of the Sites converted to RAD. This project involves a substantial scope of work intended to improve the living conditions of the residents. The construction project will require that most, if not all, households vacate their current units for the duration of the construction period. A well designed and executed relocation project is critical.

The RAD program has several critical protections for the residents:

1. All residents who remain in good standing with the CMHA have a right to return to a unit at the property where they presently reside. This right to return does not require that the CMHA return the household to the same unit they vacated for the Project. However, the household must be moved to a comparable, functionally equivalent unit that meets their needs once such a unit is ready for them. Most if not all households would be returned to the same Site they temporarily relocated from. Under some circumstances the CMHA will consider a permanent direct transfer to another CMHA unit, which would satisfy the right to return. The way a household remains in good standing is to continue to pay their rent and honor the other materials parts of their lease with CMHA. **There will be no rescreening requirements as a condition to return.**

2. The RAD program requires that CMHA develop and implement a relocation program in accordance with the Uniform Relocation Act (URA) and the RAD relocation guidelines. This program at a minimum requires that the residents shall have their relocation needs properly assessed, they be notified in advance of their relocation, CMHA pay any increased out of pocket housing cost for temporary housing for them, or provide them with a temporary housing unit that adequately meets their needs, and they are provided moving assistance. In cases where a household may be temporarily relocated for a period longer than 12-months they will have the option to accept the long-term temporary relocation or **voluntary** permanent relocation assistance.

3. Upon their move into a rehabilitated unit, each household will no longer be under the Public Housing Program, but will be under the RAD Program and a new RAD lease. The RAD lease will ensure that the household does not pay greater than 30% of its income for rent and utilities for their unit.

The RAD Programmatic Resident Relocation Assistance Plan (Plan) has been designed to explain CMHA's RAD Conversion Program (Program), the people impacted by the Program, the plan under which their needs will be evaluated, planned for, and the relocation program under which those will needs will be taken care of. The Plan also describes the outreach approach to the tenants and interested parties.

The Plan has been designed to be consistent with the requirements of the federal Uniform Relocation Assistance Act (URA) and the RAD Relocation Guidelines (Guidelines). The URA and Guidelines are both monitored and administered by HUD.

Purpose of the Plan: The purpose of the Plan is to describe the applicable relocation requirements for designing, implementing, monitoring, and closing the various relocation projects within the Program. The relocation of the residents is hereinafter referred to as the Project in the Plan. The Plan is intended to provide a communication and management tool for CMHA, the residents and all other interested parties. This vital Program tool will communicate the relocation rights, benefits and eligibility criteria for the affected the households. The Plan will describe the relocation methods used within the Program. Finally, the Plan provides the methods to be used to monitor, control and close the Project in compliance with the applicable relocation regulations.

Applicable Laws: The Project is being assisted by federal funding sources including RAD. The federal funds require that the CMHA provide a relocation program including relocation planning and assistance in accordance with the Uniform Relocation Act (URA). No state or local laws, with the exception of applicable portions of the Ohio civil rights and fair housing laws that may apply to this Project.

Relocation Assistance Program Requirements: The primary relocation responsibilities of CMHA under the URA include the following;

1. Prepare a Relocation Plan (Plan).
2. Conduct a 45-day public review and comment period to promote resident engagement and transparency of the process consistent with current CMHA policies. This period will include meetings with various important stakeholder groups. **NOTE: This process is not required under federal law or statute, but elected by CMHA under their own policies.**
3. Develop and execute a thorough resident needs assessment and relocation readiness assessment program.
4. Provide Counseling and Relocation Advisory Services to help residents to prepare for and execute their relocation.
5. Provide Written Relocation Notices to the households, including the RAD Relocation Notice, a written explanation of the relocation benefit options they have, a 90 Day Notice to Vacate to be issued 90 days before the household is to move, and a 30-day notice to vacate.
6. Where necessary to meet construction needs, provide temporary housing or make a rehabbed unit available to the household to move directly into.
7. Should permanent relocation be selected by the household or become a regulatory requirement, CMHA will work with that household to locate permanent replacement housing.
8. Provide moving assistance to temporary and/or permanent replacement housing.
9. Provide an opportunity to appeal relocation decisions.
10. Update the plan and institute program changes as regulatory requirements mandate them or needs that warrant changes arise.

Relocation Assistance Team: CMHA must identify and make a relocation specialist available to the households. CMHA is dedicated to making the relocation program and process go well. CMHA will develop a Relocation Team (Relo Team) to serve the needs of the households. OPC will further assist CMHA analyze the relocation staffing needs based on the phasing plans and construction schedules for the Project.

Resident Outreach Plan: The Households will work with the Relo Team throughout the relocation process. The Relo Team will be responsible for developing and implementing a comprehensive outreach plan. This process will start with resident meetings and focus groups where “big picture” messages will be delivered to them and their input is heard. The Relo Team will follow these meetings with individual household interviews to initiate a one to one conversation between the household and the Relo Team. The Relo Team will work with all households prior to and during each phase of the Project to create an individual relocation plan for the household and then execute their relocation with them. CMHA has established and maintains a RAD call-in line for households to call in and voice their comments and concerns. This call-in is monitored by CMHA staff. As the Relo Team is formed and staffed up, they would be expected to take over this process for the duration of the Project.

It will be vital for the Relo Team to utilize all means, methods, and channels for communication. This includes the large group and individual meetings described above, in-formal and routine contact with the residents, the call-in line, email, and participation in community events, etc. The Relo Team would also conduct routine office hours for the households to drop in and discuss their questions and needs.

Outreach to Interested Parties: CMHA recognizes that there are parties interested in learning and providing feedback on how the residents will be taken care through the relocation process. CMHA will proactively meet with, engage and take input from interested parties on the relocation process. CMHA anticipates meeting with neighborhood groups where CMHA residents may move temporarily, City, County, and State legislative groups, the Cincinnati Human Relations Commission, and community organizers. These organizations, like the residents, will have the opportunity to review the Plan during a 45-day Comment Period. This comment period will not be the only opportunity for these organizations to participate in the communications process with CMHA.

Relocation Notification Plan: The relocation team will provide all required written notifications to the household including the General Information Notice, RAD Relocation Notice, the 90-day Notice to Vacate, a 30-day Notice to Vacate, and 7-day Notice to Vacate. Depending upon the final funding plan for the Project, additional written notifications may be required. All notices will be translated into the household’s primary language, personally served and explained where possible or delivered certified return

receipt mail. A Memorandum of Understanding (MOU) will be entered into with household. The MOU will provide the household with the housing and moving assistance options available to them and the household will select the options best suited to them in the MOU.

Temporary Relocation Concepts: There are two concepts being considered by CMHA,

1. Relocate a group of tenants for the duration of the entire construction project and directly transfer households into rehabbed units once they are completed. In this concept, the first construction group would not return to their respective site until all units are completed. In this concept no households would be returned to the same unit they moved from for the rehab project; or
2. Relocate all households for the duration of the construction project and return all households relocated once all units are completed. Under this concept some households may be returned to the same unit they moved from.

Relocation Housing Plan: The housing plan to accommodate the needs of the households includes:

1. Long-term Temporary Relocation – CMHA Provided Temporary Housing: Many households may be relocated for the entire duration of the construction project as described in the Temporary Relocation Concepts above. CMHA's intent is for this relocation to be temporary because the household will have the right and opportunity to return to a revitalized unit at the same property, and at a rent that is within their financial means. However, this relocation is expected to last for a period of 18-24 months (the entire duration of the rehab process) in many or most cases. Under the URA, this would be considered a permanent displacement. However, the CMHA's intent is to return the resident to a revitalized unit at the households current Site, and will seek to enter into an agreement that documents the households understanding of their rights under the URA, and their informed decision to accept the long-term temporary relocation.

These temporary relocations, where feasible will be to other units at the Site or other CMHA properties. CMHA will also, most likely need to secure off-site resources within market rate properties in the City. In any case, where the temporary housing unit cost is higher than the household's current rent, the CMHA will pay for that rent differential. The

household would be responsible to continue to pay their current portion of their current rent to the CMHA. Under this approach, the household be moved twice (to and from temporary housing).

OPC is developing a list of potential off-site resources to be utilized by the Relo Team to master lease units as needed. This list of properties will be required to be updated periodically to ensure that is accurate and provides timely resources.

All temporary housing will undergo a Decent, Safe and Sanitary Housing (DS&S) inspection to ensure that the unit satisfies CMHA's housing quality standards. Any deficiencies discovered will be need to be corrected prior to move in unless the item does not have an adverse impact on the household's health, safety, or welfare i.e. items such as light bulb replacement may not delay a household moving in.

2. Long-term Temporary Relocation – Household Secured Accommodations aka Friends and Family: An alternate option available to the household will be the CMHA providing a monthly stipend to them for the duration of the rehab process. This stipend will be designed to help them off-set extraordinary costs such as utilities, transportation, and other costs should they elect to reside with a friend or family member (not located within another CMHA property). This option will not be intended to provide enough funds to pay off-site rent in a market rate unit. Households may be relocated for the entire duration of the construction project.

Households who may elect this option will be required to undergo additional interviews and a DS&S inspection of the location they propose to reside in. One interview will be used to assess the households expectations of the space available to them, their financial contribution to the costs associated with the location, and confirmation of their needs. The second interview would be with the owner of the friends and family housing and other adult members of the household. This interview will be used to assess their expectations for financial compensation, knowledge of the needs of the persons who will reside with them, demonstration that they can provide for any special needs in their home, and an additional DS&S inspection to determine that space is available for the CMHA resident who will reside there. CMHA may also require a background check on the friend or family member taking responsibility to house the CMHA resident.

This option will be completely voluntary. The household would be required to formally accept it through a Memorandum of Understanding (MOU). CMHA wants to make sure

that all appropriate measures are taken to ensure the residents health and safety, and ensure that they will not be taken advantage of by their friend or family member. CMHA's approval of this option for individual households will be at CMHA's sole discretion based on the interviews. In certain cases CMHA may deny approval based on misalignment of expectations for compensation between the CMHA resident and their friend or family member, in-adequate space, and in-adequate accommodations within the friends and family unit to accommodate special needs of the CMHA resident.

The household will have the option to request a temporary housing unit should their needs change due to just cause. The household would be required to provide 30-days' notice to the CMHA Relocation Team (Relo Team) and supporting documentation explaining the just cause circumstances necessitating their requested change so the Relo Team can locate adequate living accommodations for them. Under this approach, the household will be moved twice.

Once the household is moved to a permanent unit, or to other temporary housing, the stipend would be terminated.

3. Direct Transfer: Where feasible, residents will be directly transferred to a rehabilitated unit and will only be moved once. This option will be infeasible if an entire building is taken out of service for the duration of the rehab.

4. Vacancy Consolidation: Should there be ample vacancies at a property a group of households equal to the size, households may be moved within the property. This will consolidate vacancies in one location at the furthest point possible from construction. These households would remain in these units for the duration of the rehab process while others are directly transferred as units are rehabbed. Those households who are consolidated would be moved at least twice. This approach may be necessary to ensure that households who have a high level of need such as mobility impairments are able to remain at the property. This option may be used along with the other options.

5. Voluntary Permanent Relocation:

All households who would be required to temporarily relocate for a period of greater than 12-months will be given the opportunity to elect to voluntarily permanently relocate to other housing of their choice. This option would be completely voluntary and their will be no coercive methods utilized to gain a decision from the household. This option would be presented for two reasons; 1) it is a regulatory requirement; and 2) CMHA

wants to provide as much choice to the residents as possible for them to determine their future.

The household would have this option presented to them and notification that explains their relocation rights for permanent relocation and their options for long-term temporary relocation. The household would be given a period of 30-days to decide if they choose to accept Voluntary Permanent Relocation Assistance or Long-term Temporary Relocation. The household would then have 90-days from the date they select this option to complete their Voluntary Permanent Relocation with assistance from the Relo Team.

The relocation housing arrangements for each Household shall depend on a number of factors, including their wishes, the composition and needs of the household, the vacant existing units available, the timeline of construction, and the availability of suitable off-site units where needed.

Where necessary to serve the options elected by the household, the relocation team shall provide referrals to permanent Replacement Dwellings that meet the needs of the Household.

Should it be needed, the relocation team shall provide transportation services to the Households to view potential Replacement Dwellings and meet with landlords. CMHA shall also provide residents assistance to be placed on waiting lists for chosen properties and assist them with the application process.

Should the CMHA receive Section 8 Housing Choice Vouchers (HCV), all households will be given the opportunity to accept a voucher and voluntarily permanently relocate. Should limited HCV's be available, CMHA may need to develop a lottery system as an equitable means to allocate the limited vouchers. CMHA would develop a transparent process to evaluate the best approach to any lottery system that may be necessary.

Moving and Related Services Assistance Plan: The Relo Team will meet with each household to explain the moving assistance services that will be made available to them. CMHA expects to hire a moving contractor (or multiple contractors if needed) to provide moving services to the households. Services would include full packing, moving, loading, unloading, unpacking, and full replacement value insurance necessary to move the household's personal property to and from their relocation housing unit. Similar

services will be provided to households being directly transferred to their new replacement unit on-site, or those who voluntarily permanently relocate.

CMHA will organize and carry out various events through the Relo Team including spring cleaning days where households will be assisted with removing and hauling away unwanted items such as furniture and electronics.

Additional vendors may be needed for debris hauling services and specialized move support services that may be needed by senior and disabled households. In cases where a household has extreme sanitation needs, decluttering, or other unique circumstances, other vendors may be needed. Such vendors could include contractors needed to deep clean a household's unit or organize the household to prepare them for the move. These needs will be handled on a phase by phase, case by case basis. Such services are referred to as related services. All moving and related services will be directly paid for by the CMHA.

Efforts needed to treat any pest infestation issues, including bed bugs, will be made in advance of the move to ensure the household overall move readiness, and to ensure the vacated unit will not jeopardize the health or safety of contractors working in the unit. The relo team will document potential pest control issues as an observational challenge during the interview process. The Relo Team will schedule unit assessments with pest control contractors prior to each phase of construction and work with pest control. After the assessments the contractor will work with the Relo Team and other professionals including mental health and/or social services providers to develop and implement a treatment plan prior to the households move.

CMHA may elect to provide a self-move option with defined parameters to provide the household to control their move. The household would receive a fixed payment to move to their temporary unit and an additional payment to move to their permanent unit. Routine inspections prior to the households required move date will be conducted and this option may be terminated if the resident is showing visible progress within 3-days of their required move date. The current fixed move payment schedule is shown below.

**Federal Fixed Move Payment Schedule
as of 2015 – State of Ohio**

# of Moveable Rooms	Typical Unit Size Equivalent	Payment Amount
2 Rooms	Typical Studio	\$800
3 Rooms	Typical 1 BR	\$1,000
4 Rooms	Typical 2 BR	\$1,150
5 Rooms	Typical 3 BR	\$1,300
6 Rooms	Typical 4 BR	\$1,450
7 Rooms	Typical 5 BR	\$1,600
8 Rooms	Typical 6 BR	\$1,750
Additional Rooms	i.e. outdoor storage	\$265

Move Logistics and Phasing Plan: A move logistics and phasing plan has not been developed at this time. This plan will include guidance on how the Project will be divided into construction groups, how move schedules are created and managed, how the schedule is shared, and how costs are estimated and monitored.

Once construction phasing options are received from the architects and contractors, a detailed baseline move plan can be developed.

In general the number of relocations per construction group will be equal to the number of occupied housing units in that group. The goal would be to have the moving contractors and/or the households vacate in sub-groups of 4-5 per day.

Relocation Cost: CMHA shall be obligated to fund all legally-required relocation costs and expenses regardless of the budget or anticipated costs set forth in the budget. CMHA cannot offer lesser relocation payments than those required by the URA in order to conform to the parameters of the preliminary budget that is included in the approved relocation plan.

Relocation Appeals: The appeals policy and grievance procedures shall follow the standards described in the URA. Briefly stated, a relocated household shall have the right to ask for review when there is a perceived grievance regarding any of such household's rights to relocation and relocation assistance, including the determination as to eligibility, the amount of payment, or the failure to provide a comparable referral to a Replacement Dwelling. Should the appellant and CMHA staff not be able to resolve

the appeal, the appellant may forward an appeal to a third party Hearing Officer with experience handling URA relocation appeals. CMHA's Administrative Appeals Board shall make the final determination on all appeals.

Accessibility, Civil Rights, and Fair Housing:

CMHA is committed to ensuring that persons with all manner of disabilities, language requirements other than English, and other special needs have full access and participation in the relocation program including but not limited to community meetings, individual meetings, written notification, relocation housing and moving assistance services.

Meeting Accommodations - CMHA will ensure that all meetings are equipped, when needed, with language translation services including those services needed by persons who are hearing and visually impaired (HVI). CMHA will ensure that persons who are mobility impaired have adequate space and accessibility features available to them to access to private and public spaces used for meetings. CMHA will ensure that adequate transportation is available to persons who require it to access meetings. These provisions extend to community meeting, public hearing, one on one meeting, and other types of meetings where the relocation program and its assistance are discussed.

Relocation Housing - CMHA will ensure that all households are provided with relocation housing and moving assistance that is accessible to them and meets their needs. Where necessary CMHA will make housing arrangements in temporary housing to accommodate the needs of disabled persons including but not limited those with mobility and HVI needs. Where applicable CMHA will provide referrals to accessible permanent housing units. CMHA will inquire if a household has installed accessibility features at their own expense; if so CMHA will ensure that those items are moved and or replaced at CMHA's expense.

CMHA will work to affirmatively further fair housing and other fair housing and civil rights obligations and to promote fair housing choice outside of areas of minority concentration including providing referrals to housing outside of areas of areas with minority concentration in cases where a household may voluntarily permanently relocate.

Relocation Plan Review Period: The draft Plan will be made available to each Project household and interested parties for a 45-day review period so that written and verbal comments on the draft Plan can be collected. Households would receive a written notice that the draft Plan is available to read and would be provided a summary of the Plan. Non-residents, including public agencies, advocacy groups and other interested parties, will also be invited to provide written comments to the draft Plan.

A copy of the Plan will be available for review at CMHA headquarters and all affected sites. The draft Plan will also be accessible through the CMHA’s website. The draft Plan will be revised to incorporate all comments received related to the Plan.

Certification of Compliance: This Plan complies with HUD Notice H 2016-17 PIH/2016-17 (HA), the URA, and applicable fair housing and civil rights laws.

DRAFT

INTRODUCTION

Introduction: The Cincinnati Metropolitan Housing Authority (CMHA) is undertaking the first phase of its conversion of existing Low Income Public Housing (LIPH) Units to U.S. Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) Program.

As part of Phase I, CMHA will convert 628 LIPH units. These vital assets in Phase I are dispersed over six unique sites in the City of Cincinnati (City). The City is comprised of 52 neighborhoods with their own unique character and needs. The LIPH residents are an important part of the neighborhoods they reside in. CMHA's primary goal is to ensure that the residents have quality housing available to them long-term so that they will remain a part of their neighborhoods for as long as they wish.

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1. All residents who remain in good standing with the CMHA have a right to return to a unit at the property where they presently reside. This right to return does not require that the CMHA return the household to the same unit they vacated for the Project. However, the household must be moved to a comparable, functionally equivalent unit that meets their needs once such a unit is ready for them. Most if not all households would be returned to the same Site they temporarily relocated from. Under some circumstances the CMHA will consider a permanent direct transfer to another CMHA unit, which would satisfy the right to return. The way a household remains in good standing is to continue to pay their rent and honor the other materials parts of their lease with CMHA. **There will be no rescreening requirements as a condition to return.**

2. The RAD program requires that CMHA develop and implement a relocation program in accordance with the Uniform Relocation Act (URA) and the RAD relocation guidelines. This program at a minimum requires that the residents shall have their relocation needs properly assessed, they be notified in advance of their relocation, CMHA pay any increased out of pocket housing cost for temporary housing for them, or provide them with a temporary housing unit that adequately meets their needs, and they are provided moving assistance. In cases where a household may be temporarily relocated for a period longer than 12-months they will have the option to accept the long-term temporary relocation or **voluntary** permanent relocation assistance.

3. Upon their move into a rehabilitated unit, each household will no longer be under the Public Housing Program, but will be under the RAD Program and a new RAD lease. The RAD lease will ensure that the household does not pay greater than 30% of its income for rent and utilities for their unit.

The RAD Programmatic Resident Relocation Assistance Plan (Plan) has been designed to explain CMHA's RAD Conversion Program (Program), the people impacted by the Program, the plan under which their needs will be evaluated, planned for, and the relocation program under which those will needs will be taken care of. The Plan also describes the outreach approach to the tenants and interested parties.

Subject Sites

There are six subject sites contemplated for rehabilitation under RAD Phase I. They are geographically dispersed in the central portion of downtown Cincinnati. Figures 1-6 provide location data for each site. Property maps are provided in Appendix D.

Figures 1 - 6:

Beechwood	
Address	330 Forest Avenue, Cincinnati, OH 45229
Permanent Parcel ID	216-0043-0009-90

Evanston	
Address	1820 Rutland Avenue, Cincinnati, OH 45207
Permanent Parcel ID	058-0003-0024-90

Maple Tower	
Address	601 Maple Avenue, Cincinnati, OH 45229
Permanent Parcel ID	107-0008-0072-90

Riverview	
Address	2538 Hackberry Street, Cincinnati, OH 45206
Permanent Parcel ID	064-0002-0016-90

San Marco	
Address	1601 Madison Road, Cincinnati, OH 45206
Permanent Parcel ID	062-0003-0001-90

Sutter View	
Official Address	1990 Sutter Avenue, Cincinnati, OH 45225
Residential Addresses	1708-1773 Bleeker Lane, Cincinnati, OH 45225 1901-2019 Knob Court, Cincinnati, OH 45225
Permanent Parcel ID	201-0040-0189-00 201-0040-0001-00

Proposed Project Funding Sources

CMHA shall consider all potential sources of capital to finance the physical improvements of the six Phase I properties. CMHA anticipates pursuing, at a minimum 4% and 9% low-income housing tax credits. Below is a listing of potential funding sources that have been used in similar Projects that also trigger relocation requirements under the URA.

Federal:

- HUD Rental Assistance Demonstration (RAD) Program Funds
- Potential HOME Investment Partnerships Program ("HOME") and Community Development Block Grant ("CDBG") funds

CMHA will also utilize Replacement Housing Factor (RHF) and Converted Capital gained from HUD through the conversion from Public Housing to RAD.

Scope of this Plan

Public agency participation (local, state, and/or federal) and the sources of project financing are critical in determining the rules and regulations to be followed in the relocation process and establishing the rights and assistance required to be provided to those persons impacted. The Project is subject to federal relocation laws and regulations.

This Plan describes the roles and responsibility of the CMHA in the relocation process. This Plan outlines the relocation rights and benefits that CMHA is obligated to provide to the persons impacted by the Project. This Plan also describes the relocation process and mitigation measures required to ensure that existing residents are provided the relocation assistance that reasonably meets their needs. This Plan is limited to this scope, which is consistent with the guidance of federal relocation guidelines.

Beyond being a legal requirement, a relocation plan is a communication and management tool for the stakeholders involved in the relocation process. Identified stakeholders include the residential at the CMHA properties, various CMHA departments including asset management, the City of Cincinnati, Hamilton County, community-based service organizations, housing counseling organizations, legal aid and housing advocacy, and other interested parties.

This Plan is **ONLY** intended to address issues related to residential relocation and provide the stakeholders with the following information and guidance:

1. Description of the project that is requiring the relocation of the;
2. Description and analysis of the laws, statutes and regulations governing the relocation of the households, including the requirements for a relocation plan;
3. Description of the re-housing plan including how replacement housing resources will be identified and secured;
4. Relocation program to be provided, including the rights of the households, required notifications, benefits, and other services they are eligible to receive, and criteria for eligibility for assistance;
5. Responsibilities of CMHA in the implementation of this Plan;
6. Process to develop, approve and update this Plan;
7. Process for any appeals of the relocation benefits and services provided;
8. Preliminary schedule of relocation activities and a cost estimate for relocation assistance.

Overview of Relocation Planning and Implementation

Overland, Pacific & Cutler, Inc. ("OPC"), a public real estate services consulting firm specializing in relocation planning and implementation services, was hired by CMHA to prepare this Plan. This Plan serves as the master relocation plan for CMHA's RAD Conversion Program.

CMHA will develop a Relocation Team (Relo Team) to implement this plan. The CMHA Relo Team shall conduct interviews with each household to gather information required for future relocation planning and implementation purposes. CMHA will need to consider the entity best suited to provide long-term case management services to the household throughout the relocation process.

The draft version of this Plan shall be made available to the households and other interested parties for a period of forty-five (45) calendar days. **This 45-day period is not required under the URA or other federal law, however, it is CMHA's policy and CMHA feels it is important as a measure to promote a transparent planning process.** Each household shall be notified in writing where and how they can review the draft Plan, with directions to provide written comments for analysis and inclusion in the final version of this Plan. Each Household shall also receive a summary of this Plan for their use.

Appendix A of this Plan provides definitions of many of the technical and regulatory relocation terms found in this Plan.

RELOCATION PLAN

A. REGULATORY FRAMEWORK AND REQUIREMENT ANALYSIS

The laws, regulations and statutes that may become applicable to the relocation of the households are listed below.

- 49 CFR Part 24 - Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended ("Part 24")
- HUD Notice H 2016-17 (Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements Applicable to RAD First Component – Public Housing Conversions);
- Section 104(d) of the Housing and Community Development Act ("Section 104(d)") should HOME or CDBG funds be utilized;
- HUD Handbook 1378 - HUD's implementing guidelines of the URA; and
- Ohio Housing Finance Agency (OHFA) requirements.

The primary relocation regulations that guide this Plan and the relocation process are the URA and RAD relocation guidelines. CMHA shall have the responsibility of making the final determination regarding the applicable laws, regulations and statutes applicable to the Project. Should HOME or CDBG funds be utilized, Section 104(d) shall also become applicable should any units be demolished or the number of units become otherwise reduced.

Disposition of public housing projects is subject to the provisions of Section 18, and is not subject to the Uniform Relocation Act (46 U.S.C. §4600 et seq.) and the implementing regulations of Part 24 (collectively, the "URA"). However, with the Project being a RAD Conversion, it does trigger the URA. Pursuant to federal law, relocation planning is required to minimize displacement. There is no regulatory requirement for a review and comment period, approval, and adoption of the Plan. CMHA's Board of Commissioners may elect to adopt this Plan via a formal resolution.

RAD Relocation Guidelines and the URA require that eligible persons relocated by a publicly-assisted project receive the following services and benefits, which are explained in detail throughout this Plan:

1. Required advanced notice of the relocation;
2. Written information statement describing their rights to relocation benefits and services for which they are eligible;
3. Placement in a Relocation Housing Unit that adequately meets their needs and is decent, safe and sanitary (DS&S);
4. Transfer to a permanent housing unit post rehabilitation that is DS&S and meets the needs of the Household;
5. Assistance with moving to both the Relocation Housing Unit and/or their permanent housing unit including relocation of personal property and transfer of any utility accounts owned by the household; and
6. Right to appeal decisions made within the relocation program that affect them.

Appendix B of this Plan provides a side by side comparison of the URA and RAD. Section 104(d) is a potentially important regulation for the Project and provides additional protections for Households to be relocated, including the ability to provide persons who are not lawfully present in the United States relocation assistance with federal funds, and the increased number of months used to calculate potential replacement housing payments. Section 104(d) is not analyzed in Appendix B as it does not provide a comprehensive relocation regulation such as what is described under the URA and RAD.

B. PROGRAM ASSURANCES AND STANDARDS

Funding of Relocation: Adequate funds shall be made available for the relocation of all Households within the budget of the Project.

Relocation Eligibility: All eligible households shall be provided relocation assistance and benefits under the URA and Section 104(d), where applicable. Where an Ohio (State) Law provides a higher level of benefit than the federal laws and guidelines, the household shall receive the greater benefits under those State laws.

The opportunity for review and to provide written comments to this Plan by the residents and other interested stakeholders for a period of no less than forty-five (45) calendar days is recommended before any relocation occurs.

Each household eligible for relocation assistance must be notified of the rights, benefits and assistance they have in writing. If a Household is deemed ineligible for relocation

assistance, they must be informed in writing of the reasons why they are not eligible to receive relocation assistance and the procedures to appeal this decision.

Accessibility, Civil Rights, and Fair Housing: Relocation assistance services shall be provided to ensure that relocation does not result in different, or separate treatment of Households based on race, nationality, color, religion, national origin, sex, marital status, familial status, disability or any other basis protected by the federal Fair Housing Amendments Act, the Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, and Title VIII of the Civil Rights Act of 1968, as well as any otherwise arbitrary or unlawful discrimination.

CMHA is committed to ensuring that persons with all manner of disabilities, language requirements other than English, and other special needs have full access and participation in the relocation program including but not limited to community meetings, individual meetings, written notification, relocation housing and moving assistance services.

Meeting Accommodations - CMHA will ensure that all meetings are equipped, when needed, with language translation services including those services needed by persons who are hearing and visually impaired (HVI). CMHA will ensure that persons who are mobility impaired have adequate space and accessibility features available to them to access to private and public spaces used for meetings. CMHA will ensure that adequate transportation is available to persons who require it to access meetings. These provisions extend to community meeting, public hearing, one on one meeting, and other types of meetings where the relocation program and its assistance are discussed.

Relocation Housing - CMHA will ensure that all households are provided with relocation housing and moving assistance that is accessible to them and meets their needs. Where necessary CMHA will make housing arrangements in temporary housing to accommodate the needs of disabled persons including but not limited those with mobility and HVI needs. Where applicable CMHA will provide referrals to accessible permanent housing units. CMHA will inquire if a household has installed accessibility features at their own expense; if so CMHA will ensure that those items are moved and or replaced at CMHA's expense.

CMHA will work to affirmatively further fair housing and other fair housing and civil rights obligations and to promote fair housing choice outside of areas of minority concentration including providing referrals to housing outside of areas of areas with minority concentration in cases where a household may voluntarily permanently relocate.

C. RELOCATION PLANNING AND NEEDS ASSESSMENT METHODOLOGY

Early Resident Outreach

A relocation committee will not be established for the Project. In lieu of a relocation committee, CMHA will routinely reach out to the residents to provide them with information and obtain their feedback (concerns, questions, support, and recommendations).

A series of informational community meetings in which all households will be invited to attend started in May 2016 and will continue throughout the relocation process. Topics to be discussed during these meetings include or will include broad and detailed overviews of the relocation process, relocation counseling and benefits, the rehabilitation project and its phasing, and other pertinent information determined to be necessary by the CMHA and/or feedback obtained from the residents.

Focus groups based on phasing plans, household composition (i.e. families with children) and seniors may also occur. These focus group meetings will be intended to discuss the current details of the Project in smaller groups and address issues of particular concern to those residents within those focus groups. This form of outreach will ideally take the pulse and engage in more detailed planning with groups of households with similar needs but necessarily the needs of all of the households at a particular property. The questions, comments and concerns raised at these meetings will be documented by CMHA and shall be used to develop a list of policy questions to be considered and planned around. Substantive issues raised may be used to update this plan, or develop site specific relocation plans.

As stated under the Program Assurances and Standards section of this plan, CMHA will meet all civil rights and accessibility requirements related to these meetings and ensure they are accessible to all residents.

Analysis of Existing Data

Utilizing existing household data, OPC was able to ascertain household information such as the number of households and the ages of members of the households. This data has been used to describe the impacted residential population found later in this Plan. Additional household information will be needed to be collected to develop site specific and household relocation plans.

Resident Interview Process

An important process in relocation planning is collecting primary information from the impacted households and providing an open forum to provide the household with information regarding the relocation program and answer their questions regarding the program. This typically occurs by conducting an interview with the household in their home. This process is a substantial component to assisting the CMHA meet its Civil Rights, furthering fair housing, and meets its accessibility requirements to the households through the relocation process.

Through these meetings, household composition, special needs, specific concerns regarding relocation, and unique requirements related to the physical move process are gained. This data is then used by the Relo team to better plan for the household's relocation needs on an individual basis. Household preferences for housing will also be discussed in cases where a household may desire to voluntarily permanently relocate. During the interview process the Relo Team will also document observational issues and challenges including potential pest infestations, clutter issues, and other health and safety issues that may present risks to the resident and contractors who may work in the unit during the Project.

The Relo Team shall be responsible for conducting interviews with all Households impacted. Each Household interview is expected to take approximately one-half hour to one hour to complete. If required, the Relo Team can be supplemented with language translators to assist them communicate with persons who's primary language is not English.

Household interviews should be completed no less than 90-days prior to the relocation of each construction group. The Relo Team will send each household an invitation to schedule an appointment to meet with the team. Where households are not responsive, the team will make three attempts through "door knocking" to engage the household directly. Where a household does not engage with the team, they will receive

notification of the arrangements made for them without benefit of advising the team of their needs and will be expected to comply with all noticing.

Where necessary, CMHA will provide reasonable accommodations for disabled persons to ensure they are able to fully participate in this process.

Plan Preparation, Approval and Updates

This Plan will be made available to the residents of the Project and other interested parties for a forty-five (45) calendar day review and comment period. Section O of this Plan describes the review and comment period in more detail. This comment period will provide the households and other interested parties an opportunity to advise CMHA on the planning process and give important feedback to CMHA. **This period is not required; however, CMHA has elected to make this comment their policy towards approval of this Plan.**

This Plan shall be periodically reviewed for consistency with the goals and process of the Project as changes occur. Updates shall be made to this Plan if major substantive changes occur in the Project. Such changes include as, without limitation, enhanced levels of resident information, housing resource alternatives identification, elimination of a phased approach to the relocation, and/or regulatory changes that impact relocation requirements. **Updated versions of this Plan will be made available to the households as they occur.**

D. GENERAL DEMOGRAPHICS AND OCCUPANT DATA & DESCRIPTIONS

General Demographics and Housing Characteristics

According to the City of Cincinnati and the 2010 U.S. Census, the population of the City is 296,943 (see **Table 1**). Corresponding U.S. Census data concerning the housing mix is shown in **Table 2**.

Table 1: 2010 Census Population – City of Cincinnati

Geography	Total Households	Total Persons	Persons Per Household	% Male	% Female	% Persons Under 18	% Persons Over 62
City of Cincinnati	131,160	296,943	2.17	48%	52%	22%	11%
Hamilton County	329,062	802,304	2.39	48%	52%	23%	13%

Source: US Census Bureau

Table 2: 2010 Census Housing Units – City of Cincinnati

Type	City	%
Total Housing Units	161,095	100%
Total Occupied Units	133,420	82%
Owner-Occupied	51,582	39%
Renter-Occupied	81,852	61%
Vacant Housing Units	27,675	18%
Available for Sale Only (of Total Vacant Units)	2,864	10%
Available for Rent – Full Time Occupancy (of Total Vacant Units)	14,184	51%

Source: US Census Bureau

CMHA RAD I - Household Demographic and Housing Characteristics

OPC was able to obtain limited demographic information pertaining to the current households. This section provides data related to the total number of households, persons, persons under 18 and persons over 62, and the number of senior led households. The data found in these tables shall be updated for the entire household composition once the relocation interview process is complete, and additional data pertaining the number of disabled persons, language needs, and other demographic data related to providing relocation assistance services will be included in future updates to this plan.

The data provided in Tables 3-5 below represents the best available data at this time. The data is provided for each of the six properties contemplated in RAD Phase I. The data shall be updated once the interview process described in Section B is completed.

Table 3: Data Analysis Results – Population and Households

Property	Total Households	Total Persons	Persons Per Household	% Male	% Female	Persons Under 18	Persons Over 62	Senior Led Households
Beechwood	148	148	1.0	59%	41%	None	52	52
Evanston	100	102	1.0	29%	59%	None	69	69
Maple Tower	120	124	1.0	52%	48%	None	55	55
Riverview	108	109	1.0	59%	41%	None	41	40
San Marco	30	31	1.0	45%	55%	None	13	13
Suterview	116	315	2.7	36%	64%	184	4	4

Table 4: Data Analysis Results – Race Distribution of Households

Race	% of Households
Black/African American	92.93%
Hispanic or Latino/a	Not Tracked
Pacific Islander	0.0%
Asian	0.24%
White	6.83%
Other Races	Not Tracked

Table 5: Data Analysis Results – Primary Language Spoken at Home

Property	English Speaking Households	Other Languages Spoken
Beechwood	TBD	TBD
Evanston	TBD	TBD
Maple Tower	TBD	TBD
Riverview	TBD	TBD
San Marco	TBD	TBD
Suterview	TBD	TBD

Existing Low Income Public Housing Units

Table 6 below shows the unit mix of the existing units and Table 7 shows the proposed units post conversion.

Table 6: Existing Units

Property	Bedrooms							Total Units
	0	1	2	3	4	5	6	
Sutter View	0	23	41	27	23	0	1	114
Beechwood	0	147	1	0	0	0	0	148
Evanston	0	100	0	0	0	0	0	100
Maple Tower	0	114	6	0	0	0	0	120
Riverview	0	107	1	0	0	0	0	108
San Marco	0	30	0	0	0	0	0	30
Total								623

Property	Units for Persons With Disabilities (504/UFAS Units)		
	Full ADA	Partial ADA	Sight/Sound
Sutter View	0	8	0
Beechwood	7	0	0
Evanston	4	6	0
Maple Tower	6	0	1
Riverview	0	1	0
San Marco	0	0	0
Total	17	15	1

Table 7: Proposed Units

Property	Bedrooms							Total Units
	0	1	2	3	4	5	6	
Sutter View	0	24	44	28	24	0	0	120
Beechwood	8	136	1	0	0	0	0	145
Evanston	0	100	0	0	0	0	0	100
Maple Tower	0	114	6	0	0	0	0	120
Riverview	0	99	1	0	0	0	0	100
San Marco	0	30	0	0	0	0	0	30
Total								615

Property	Accessible Units		
	Full ADA	Partial ADA	Sight/Sound
Sutter View	12	0	6
Beechwood	15	0	8
Evanston	10	0	5
Maple Tower	12	0	6
Riverview	10	0	5
San Marco	3	0	2
Total	62	0	32

Below are notes that explain the variances between the existing units shown in Table 6 and the proposed units in Table 7 as well as proposed enhancements to the CMHA’s stock of accessible units.

Beechwood: Eight studio units will be reconfigured to create four new one bedroom units.

Riverview: All studio units will be reconfigured to create new additional one bedroom units; two new one bedroom units will be created from every three studio units.

Sutter View: One building housing 5 units will be demolished. These households would be accommodated in other units at the property or within the CMHA portfolio and would not be permanently displaced by this activity.

E. RELOCATION ASSISTANCE ELIGIBILITY

Relocation Eligibility Under 24 CFR Part 970 and the URA

Part 970.5 (h) determines that it is the responsibility of CMHA to comply with the URA.

It is presently assumed that all persons lawfully occupying the Project units at the time they will be required to temporarily relocate will be eligible to receive temporary relocation assistance. As previously stated, the period that a household could be temporarily relocated may exceed 12-months, in which case they will be presented the option to accept the long-term temporary relocation assistance, or seek assistance as a displaced person. No other condition except for a temporary relocation in excess of 12-months is expected to be present that would potentially make the households eligible for permanent relocation assistance.

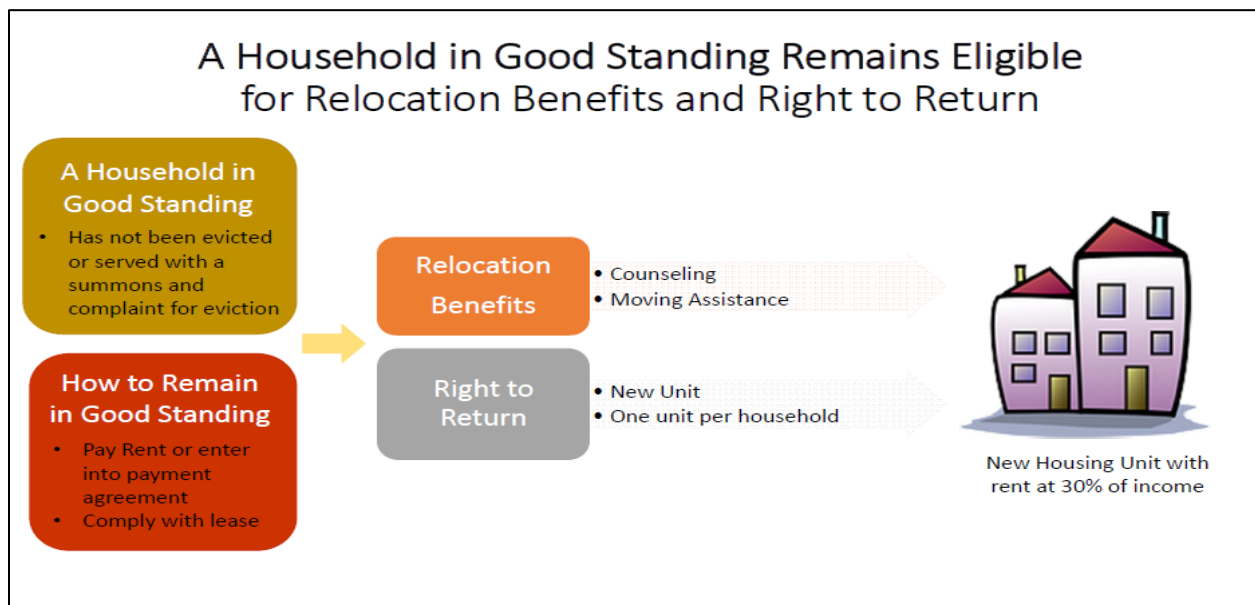
In accordance with 970.5 (i) (2) (v) (B) (3) a person does not qualify as a displaced person if they have been:

- Evicted for serious or repeated violation of the terms and conditions of their lease, violation of applicable federal, state or local law or other good cause, and CMHA determines that eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance;
- The person moved into the property after submission of the application for disposition and the person was informed of the impact the Project could have on them in writing (also referred to as a move-in notice); or
- The person is otherwise ineligible for relocation assistance under the URA as described in in Section 24.2(9) (ii) of the URA.

CMHA issued a General Information Notice (the "GIN") to all Households on October 30, 2015. This notice advised the household not to move until they receive further notice. Any household or person who vacates after receiving this notice and prior to receiving notification of their relocation will not be eligible for any permanent or temporary relocation assistance. Households who move prior to being notified of their requirement to relocate will forfeit all rights they may have under the URA.

In addition, so long as the household is in "Good Standing" with CMHA they retain the "Right to Return" to rehabilitated unit. Figure 6 below provides a graphical representation of "Good Standing and Right to Return".

Figure 6: Right to Return Graphic



Relocation Eligibility Under RAD

RAD is a source of federal participation that requires relocation to be in accordance with the URA. Under the RAD program, a household is eligible to receive temporary relocation assistance or permanent relocation assistance if they are relocated for a period longer than 12-months. The Household becomes eligible for relocation assistance once HUD issues a RAD Conversion Commitment ("RCC"). No RCC has been issued by HUD for the Project, and thus no households are presently eligible for relocation assistance under the RAD program.

Each household shall receive a RAD Notice of Relocation after the RCC is issued. Such notice shall explain the relocation rights of Households under the RAD program, including the requirement that permanent relocation be in accordance with the URA and Section 104(d), the right to move to a replacement housing unit within the Project or to receive permanent relocation assistance to move to other housing, and other benefits under the RAD program. The RAD Notice of Relocation shall be in addition to other notices required under the URA or CMHA policies.

Ineligibility for Relocation Assistance

Any household that has been evicted for cause, that voluntarily moves from the Project after receiving the GIN, or is not in lawful occupation of its unit, shall not be eligible to receive relocation assistance.

F. REPLACEMENT HOUSING NEEDS & RESOURCES

Replacement Housing Needs

The existing housing units will all be rehabilitated. All current households in Good Standing shall be offered a unit within the Project once a unit that meets their needs has been rehabilitated and available for them.

Under one concept, as discussed later in this plan, all households may be moved from the entire building for the duration of the rehab. Under this concept as many as 250 households would be required to move to temporary housing at other CMHA properties or the open market.

Temporary Housing Plan

All households will be relocated from their current or "original" units for the rehabilitation project. The phasing plan has not yet been determined. The rehab of the units is expected to last longer than twelve (12) months.

Households will be temporarily relocated to other units within the Project, or other properties in CMHA's portfolio, or to a unit secured by CMHA within the local housing market.

There may be an opportunity for some households to voluntarily elect to permanently relocate to other housing in other neighborhoods. Such households would not return to a rehabilitated Project unit. A relocation of this nature would be considered a voluntary permanent relocation, rather than a temporary relocation. Such household's right to return would be met by their permanent occupancy in their new unit. All of CMHA's relocation obligations and requirements would be met by assisting these households to secure their new unit, and ensuring that all actual, reasonable and necessary costs for their move are either reimbursed to such Household or directly paid for by CMHA.

In accordance with the URA and the RAD Relocation Guidelines, in cases where a Household is temporarily relocated for a period longer 12- months, the Household shall be made aware of its right and eligibility for permanent relocation assistance benefits. Such benefits include assistance to secure and relocate to a comparable, permanent Replacement Dwelling. If any such cases occur, eligible Households shall be afforded the option to extend their temporary relocation in their off-site temporary housing unit for the period necessary to complete construction of a new unit at the Project that meets

the needs of such Household. Such Households shall be asked to sign a legally-binding agreement with CMHA acknowledging their agreement to this arrangement and their understanding that permanent relocation assistance benefits are being waived. CMHA would prefer to make this type of arrangement with such Households so that they may return to the Project and enjoy the revitalized property. This arrangement also works to meet the spirit of federal relocation laws, which is to minimize permanent relocation and displacement.

All Households shall receive a RAD Notice of Relocation. In accordance with RAD relocation regulations, it is required that the household be offered the choice between relocation assistance to move to a permanent Replacement Dwelling of their choice or be provided with temporary housing assistance and then return to a new unit when a unit is available for them.

During the interview process, households shall be asked if they have any needs that would require them to be relocated from their current property during construction. Households shall also be asked if they have an interest in relocating to a permanent Replacement Dwelling elsewhere.

Households in Good Standing that have medical or other special needs that need to be accommodated during construction, who wish to return, shall be moved to off-site housing that meets the needs of such Households for the duration of the construction period. The Household shall not incur any increased out-of-pocket costs related to the temporary housing off-site. All increased housing costs shall be borne by CMHA. NOTE: the household will be required to pay their portion of the rent for their permanent unit during the relocation period. Upon completion of construction the household will be moved to a unit that meets their needs.

The Relo Team shall work with those Households who have an interest in permanently relocating to another Replacement Dwelling. It is not known at this time if CMHA will receive portable Section 8 housing choice vouchers ("HCV") or Tenant Protection Vouchers ("TPV"), each of which may be offered to Households desiring to relocate to other housing not part of the Project. **Ultimately the household would select where they would use their voucher, however, CMHA will ensure that housing referrals are made to housing opportunities outside of areas of minority concentrations.**

To assess the current availability of potential off-site Relocation Housing Units, OPC conducted a preliminary housing survey of units currently available in the City of Cincinnati in September of 2016. These units could be a resource for off-site temporary housing or permanent off-site replacement housing units. The following Table 8 provides the results of this survey. Limitations put on this survey include not exceeding the Hamilton County Fair Market Rent (FMR) by more than \$100 per month.

Note that the Relo Team shall conduct more in-depth replacement housing searches based on residents' needs and requests prior to relocations as needed.

Table 8: Replacement Housing Survey Results

Unit Size	# Found	FMR	Average Rent	Median Rent	Rent Range
Studio	10	\$509	\$474	\$457	\$395-\$615
1BR	14	\$600	\$607	\$625	\$475-\$700
2BR	11	\$787	\$705	\$675	\$580-\$885
3BR	4	\$1,102	\$893	\$853	\$675-\$1,190
4BR	8	\$1,297	\$897	\$895	\$795-\$995

OPC’s initial search yielded a total of 47 units that were no more than \$100 per month over the FMR. With this being a snapshot of what may be available at CMHA’s target rent for temporary housing in a given month (more or less), CMHA may need to start leasing units 5 months prior to their need to acquire all 250 units needed. This supply and demand analysis should be re-evaluated periodically.

G. CONCURRENT RESIDENTIAL RELOCATION

CMHA and the Relo Team shall monitor upcoming projects to determine if they may impact the availability of off-site temporary housing for the households. In such cases where another project may limit CMHA’s ability to satisfy its obligations, CMHA will adjust their plans accordingly to acquire units sooner than needed or alter its phasing plans.

H. RELOCATION ASSISTANCE PROGRAM

Relocation Staff Availability and Responsibilities

CMHA's Relo Team (Team) shall be available to assist any Household with questions about relocation and/or assistance in relocating. The Team shall provide all households with the location and hours of operation of the relocation office at a later date. Close personal contact shall be maintained with each household. Should Team staff contact information change, this Plan shall be updated, and all Households shall receive a notice of the applicable changes.

Specific activities performed by relocation staff shall include:

1. Personally interview all households to collect necessary information to serve the household through the relocation process.
2. Develop and manage a matrix of observational challenges such as pest infestation and clutter issue related to the households.
3. Monitor the RAD call-in line and field household questions and concerns.
4. Conduct routine office hours at each site to be available for questions and concerns.
5. Personally present and explain the RAD Relocation Notice.
6. Prepare and present a Memorandum of Understanding (MOU) and other relocation agreements that may be required.
7. Distribute the 90-Day and 30-Day Notice to Vacate, and other reminder notices related to the date each household must vacate their current unit.
8. Provide referrals to replacement housing as needed and required.
9. Provide the households with advisory services to assist them in making good decisions to plan their move.
10. Coordinate moves to the Relocation Housing Unit and return to the household's permanent unit.
11. Assist with the completion and filing of any needed relocation claims, rental applications, and appeals forms, if necessary.
12. Provide housing payment assistance as required under the applicable relocation requirements.
13. Other assistance that may be appropriate to ensure that each household receives services and benefits that are reasonably permitted and/or required under the URA and necessary to ensure that hardships and impacts are reduced as much as possible in the relocation process.

14. Document receipt of all required notices, housing referrals provided, signed claims and receipts of payments, and demonstration of advisory services and relocation assistance provided to Households in the relocation file of each Household.

Noticing

Legally required notices and notices required under applicable regulations will be personally served. Other important notifications will be mailed with a certified return receipt. All notices and proof of service shall be maintained in the relocation case files. At a minimum, each household shall receive the following from the relocation team.

1. A relocation assistance informational brochure or statement. This notice shall be developed at a later date and included in a future version of this Plan.
2. A RAD Notice of Relocation, if applicable. Sample provided in Appendix E.
3. A Memorandum of Understanding or Memorandum of Agreement (collectively, the "MOU") would be used in cases where a household does not permanently relocate. The MOU shall serve as an agreement between CMHA and the Household to define what benefits and assistance such Household shall receive and the obligations of both CMHA and the Household.
4. Notice of Eligibility (NOE) shall be used in cases where a household relocates permanently. These notices shall be developed by the Relo Team at a later date once all relocation program requirements are defined based on the final funding plan for the Project (or, to the extent applicable, the Phase of the Project).
5. A notice of ineligibility. Any Household or person not eligible for relocation assistance shall receive a notice of ineligibility. The notice shall state why such Household or person is not eligible to receive relocation assistance. Note that households shall have the right to appeal such a decision in accordance with the appeals process of this Plan.
6. A 90-Day Notice prior to the required vacation date. Such notice shall be hand delivered and the head of household will be required to acknowledge receipt of the notice. These notices may be served concurrently with the MOU, NOE or notice of ineligibility. Sample provided in Appendix E.
7. A 30-Day Notice prior to the required vacation date. Such notice shall be hand delivered and the head of household will be required to acknowledge receipt of the notice. NOTE: A 30-Day Notice shall only be served in cases where a Household is still occupying a unit thirty (30) calendar days prior to the expiration of the 90-Day Notice. Sample provided in Appendix E.

8. A move procedures guide that explains the details of move day activities and post move out procedures. The guide shall be served as needed with the 30-Day Notice and unit offer, and its procedures shall be developed by the Relo Team at a later date when the final move program is defined.
9. Additional notification seven (7) calendar days prior to the vacation of the Household may be required to communicate changes to the move date, location of relocation housing, or other changes or details required. Sample provided in Appendix E.

Notices shall be provided to the household in the primary language of such household. All notices shall inform the household of their right to request a reasonable accommodation.

Relocation Readiness Evaluations and Preparation

The Team shall conduct multiple relocation readiness meetings with each Household, commencing approximately one hundred twenty (120) to one hundred fifty (150) calendar days prior to the expected date of relocation for such Household. Such readiness checks shall be used to verify accessibility needs in Relocation Housing Units, changes in family composition, Good Standing of the household, needs related to decluttering, and other checks to ensure that the Household is prepared, its housing needs are adequately addressed, and the proper level of moving assistance is provided. The relocation team shall also conduct several less formal, routine check-ins with the Households.

Temporary Relocation Concepts: There are two concepts being considered by CMHA,

1. Relocate a group of tenants for the duration of the entire construction project and directly transfer households into rehabbed units once they are completed. In this concept, the first construction group would not return to their respective site until all units are completed; or
2. Relocate all households for the duration of the construction project and return all households relocated once all units are completed.

Relocation Housing

Relocation Housing Plan: The housing plan to accommodate the needs of the households includes:

1. Long-term Temporary Relocation – CMHA Provided Temporary Housing: Many households may be relocated for the entire duration of the construction project as described in the Temporary Relocation Concepts above. CMHA's intent is for this relocation to be temporary because the household will have the right and opportunity to return to a revitalized unit at the same property, and at a rent that is within their financial means. However, this relocation is expected to last for a period of 18-24 months (the entire duration of the rehab process) in many or most cases. Under the URA, this would be considered a permanent displacement. However, the CMHA's intent is to return the resident to a revitalized unit at the households current Site, and will seek to enter into an agreement that documents the households understanding of their rights under the URA, and their informed decision to accept the long-term temporary relocation.

These temporary relocations, where feasible will be to other units at the Site or other CMHA properties. CMHA will also, most likely need to secure off-site resources within market rate properties in the City. In any case, where the temporary housing unit cost is higher than the household's current rent, the CMHA will pay for that rent differential. The household would be responsible to continue to pay their current portion of their current rent to the CMHA. Under this approach, the household be moved twice (to and from temporary housing).

OPC is developing a list of potential off-site resources to be utilized by the Relo Team to master lease units as needed. This list of properties will be required to be updated periodically to ensure that is accurate and provides timely resources.

All temporary housing will undergo a Decent, Safe and Sanitary Housing (DS&S) inspection to ensure that the unit satisfies CMHA's housing quality standards. Any deficiencies discovered will be need to be corrected prior to move in unless the item does not have an adverse impact on the household's health, safety, or welfare i.e. items such as light bulb replacement may not delay a household moving in.

2. Long-term Temporary Relocation – Household Secured Accommodations aka Friends and Family: An alternate option available to the household will be the CMHA

providing a monthly stipend to them for the duration of the rehab process. This stipend will be designed to help them off-set extraordinary costs such as utilities, transportation, and other costs should they elect to reside with a friend or family member (not located within another CMHA property). This option will not be intended to provide enough funds to pay off-site rent in a market rate unit. Households may be relocated for the entire duration of the construction project.

Households who may elect this option will be required to undergo additional interviews and a DS&S inspection of the location they propose to reside in. One interview will be used to assess the households expectations of the space available to them, their financial contribution to the costs associated with the location, and confirmation of their needs. The second interview would be with the owner of the friends and family housing and other adult members of the household. This interview will be used to assess their expectations for financial compensation, knowledge of the needs of the persons who will reside with them, demonstration that they can provide for any special needs in their home, and an additional DS&S inspection to determine that space is available for the CMHA resident who will reside there. CMHA may also require a background check on the friend or family member taking responsibility to house the CMHA resident.

This option will be completely voluntary. The household would be required to formally accept it through a Memorandum of Understanding (MOU). CMHA wants to make sure that all appropriate measures are taken to ensure the residents health and safety, and ensure that they will not be taken advantage of by their friend or family member. CMHA's approval of this option for individual households will be at CMHA's sole discretion based on the interviews. In certain cases CMHA may deny approval based on misalignment of expectations for compensation between the CMHA resident and their friend or family member, in-adequate space, and in-adequate accommodations within the friends and family unit to accommodate special needs of the CMHA resident.

The household will have the option to request a temporary housing unit should their needs change due to just cause. The household would be required to provide 30-days' written notice to the CMHA Relocation Team (Relo Team) and supporting documentation explaining the just cause circumstances necessitating their requested change so the Relo Team can locate adequate living accommodations for them. Under this approach, the household will be moved twice.

Once the household is moved to a permanent unit, or to other temporary housing, the stipend would be terminated.

3. Direct Transfer: Where feasible, residents will be directly transferred to a rehabilitated unit and will only be moved once. This option will be infeasible if an entire building is taken out of service for the duration of the rehab.

4. Vacancy Consolidation: Should there be ample vacancies at a property a group of households equal to the size, households may be moved within the property. This will consolidate vacancies in one location at the furthest point possible from construction. These households would remain in these units for the duration of the rehab process while others are directly transferred as units are rehabbed. Those households who are consolidated would be moved at least twice. This approach may be necessary to ensure that households who have a high level of need such as mobility impairments are able to remain at the property. This option may be used along with the other options.

5. Voluntary Permanent Relocation: All households who would be required to temporarily relocate for a period of greater than 12-months will be given the opportunity to elect to voluntarily permanently relocate to other housing of their choice. This option would be completely voluntary and there will be no coercive methods utilized to gain a decision from the household. This option would be presented for two reasons; 1) it is a regulatory requirement; and 2) CMHA wants to provide as much choice to the residents as possible for them to determine their future.

The household would have this option presented to them and notification that explains their relocation rights for permanent relocation and their options for long-term temporary relocation. The household would be given a period of 30-days to decide if they choose to accept Voluntary Permanent Relocation Assistance or Long-term Temporary Relocation. The household would then have 90-days from the date they select this option to complete their Voluntary Permanent Relocation with assistance from the Relo Team.

The relocation housing arrangements for each Household shall depend on a number of factors, including their wishes, the composition and needs of the household, the vacant existing units available, the timeline of construction, and the availability of suitable off-site units where needed.

Where necessary to serve the options elected by the household, the relocation team shall provide referrals to permanent Replacement Dwellings that meet the needs of the Household. **Ultimately the household would select where they would use their voucher, however, CMHA will ensure that housing referrals are made to housing opportunities outside of areas of minority concentrations.**

Should it be needed, the relocation team shall provide transportation services to the Households to view potential Replacement Dwellings and meet with landlords. CMHA shall also provide residents assistance to be placed on waiting lists for chosen properties and assist them with the application process.

Should the CMHA receive Section 8 Housing Choice Vouchers (HCV), all households will be given the opportunity to accept a voucher and voluntarily permanently relocate. Should limited HCV's be available, CMHA may need to develop a lottery system as an equitable means to allocate the limited vouchers. CMHA would develop a transparent process to evaluate the best approach to any lottery system that may be necessary.

Moving Services and Other Vendors

The Relo Team will meet with each household to explain the moving assistance services that will be made available to them. CMHA expects to hire a moving contractor (or multiple contractors if needed) to provide moving services to the households. Services would include **all materials and supervision provided by the moving contractor**, full packing, moving, loading, unloading, unpacking, and full replacement value insurance necessary to move the household's personal property to and from their relocation housing unit. Similar services will be provided to households being directly transferred to their new replacement unit on-site, or those who voluntarily permanently relocate. **The Relo Team would be responsible to monitor the households move.**

Additional vendors may be needed for debris hauling services and specialized move support services that may be needed by senior and disabled households. In cases where a household has extreme sanitation needs, decluttering, or other unique circumstances, other vendors may be needed. Such vendors could include contractors needed to deep clean a household's unit or organize the household to prepare them for the move. These needs will be handled on a phase by phase, case by case basis. Such services are referred to as related services. All moving and related services will be directly paid for by the CMHA.

Efforts needed to treat any pest infestation issues, including bed bugs, will be made in advance of the move to ensure the household overall move readiness, and to ensure the vacated unit will not jeopardize the health or safety of contractors working in the unit. The Relo team will document potential pest control issues as an observational challenge during the interview process. The Relo Team will schedule unit assessments with pest control contractors prior to each phase of construction and work with pest control. After the assessments the contractor will work with the Relo Team and other professionals including mental health and/or social services providers to develop and implement a treatment plan prior to the households move.

CMHA may elect to provide a self-move option with defined parameters to provide the household to control their move. The household would receive a Fixed Move Payment (FMP) to move to their temporary unit and an additional payment to move to their permanent unit. The current FMP amounts are shown in Table 10 below. Routine inspections prior to the households required move date will be conducted and this option may be terminated if the resident is showing visible progress within 3-days of their required move date.

Utility Transfer Fee Reimbursement

Any necessary utility transfer fees shall be paid directly by the Household, and the Household shall be reimbursed by CMHA. Such transfers include cable, landline telephone and internet services. Payments shall be based on actual receipts or invoices. Advance payments may be considered, if a Household demonstrates that they cannot secure in their name without an advanced payment to do so.

Relocation Fair

The Relo Team may at a future date organize a relocation fair, where the residents can meet the Relo Staff, vendors, and other parties that shall help implement this relocation plan.

Spring Cleaning

Leading up to all relocation phases, CMHA shall make dumpsters and labor available to the residents that comprise the phase's construction group to assist them in disposing of unwanted items such as furniture and electronics as they prepare to move.

Permanent Off-Site Relocation

Households that move permanently shall receive additional relocation benefits, other than those stated above, to the extent required by applicable law.

Fixed Payment In-lieu of Actual and Reasonable Move Costs: Should a household move off-site to a permanent Replacement Dwelling instead of returning to a RAD unit, the household shall have the option to receive a FMP based on the current number of moveable rooms of personal property in their existing unit to conduct a self-move in lieu of having a professional mover relocate their personal property. The current federal FMP schedule for the state of Ohio is presented in the following Table 9. A household that elects to receive the FMP shall not receive moving compensation for costs such as labor, boxes and other packing materials, utility transfers, or other costs related to the physical move, because the intent of the FMP is to provide funds to the household to pay for all costs associated with the move per the URA.

**Table 9: Federal Fixed Move Payment Schedule
as of 2015 – State of Ohio**

# of Moveable Rooms	Typical Unit Size Equivalent	Payment Amount
2 Rooms	Typical Studio	\$800
3 Rooms	Typical 1 BR	\$1,000
4 Rooms	Typical 2 BR	\$1,150
5 Rooms	Typical 3 BR	\$1,300
6 Rooms	Typical 4 BR	\$1,450
7 Rooms	Typical 5 BR	\$1,600
8 Rooms	Typical 6 BR	\$1,750
Additional Rooms	i.e. outdoor storage	\$265

Permanent Replacement Housing Assistance Payment: When a Household moves into their new unit they would lease the unit with a rent at no greater than thirty percent (30%) of their income with adjustments for utility services such as electricity.

Should a household move to non-RAD unit, and the household is eligible to receive a HCV or TPV, the HCV or TPV would be expected to offset the need for a rent differential payment. However, should the household realize an increase in out-of-pocket monthly housing cost with one of these vouchers, the household would be eligible to receive a rent differential payment in accordance with the URA. Should a

Household permanently relocate to other housing and not be eligible to receive a HCV or TPV, the household would also be eligible to receive a rent differential payment in accordance with the URA.

In either case, where applicable, the rental differential payment shall be based on the monthly differential between the rent for a comparable replacement dwelling and the lesser of thirty percent (30%) of the gross income of such Household (ability to pay), or their displacement rent and utility costs. This monthly differential shall then be multiplied by forty-two (42) months (unless 104(d) is triggered, and then such timeframe is extended to sixty (60) months) to derive the maximum eligible replacement housing benefit. The actual rent differential payment the eligible household would receive would be based on the differential between the actual contract rent and utilities' costs at the replacement dwelling and the lesser of thirty percent (30%) of the gross income of the Household or their displacement rent and utility costs. The following Table 10 provides a sample calculation of this payment.

Table 10: Example Computation of Rent Differential Payment *

1. Rent of Displacement Unit	\$400	Displacement Rent plus Utility Costs
or		
2. Ability to Pay	\$450	30% of the Gross Household Income
3. Lesser of lines 1 or 2	\$400	
Subtracted From:		
4. Actual New Rent	\$550	Actual New Rent including Utility Allowance
or		
5. Comparable Rent	\$500	Determined by Displacing Agency; <u>includes</u> Utility Allowance
6. <u>Lesser</u> of lines 4 or 5	\$500	
7. Yields Monthly Need:	\$100	Subtract line 3 from line 6
8. Rental Assistance	\$4,200	Multiply line 7 by 42 months

****Note: This is a sample case only and is not reflective of actual market conditions. Not all Households shall receive this type of relocation assistance. The Household should discuss their eligibility for this type of relocation assistance prior to making any decisions regarding their replacement housing options. This form of payment shall be provided based on need. This payment is limited to the forty-two (42) month period prescribed under the URA unless Section 104(d) of the Housing and Community Redevelopment Act becomes applicable to the Project.***

It should be understood that the payment described above is “spend to get” and there must be a reasonable need for the payment. The Relo Team will be required to establish a reasonable comparable rent to determine if a household may require additional assistance with their housing payments. In cases where a household will receive a voucher, this payment should be necessary.

Households who are offered a voucher will not be able to reject the voucher in lieu of this payment, as the offer of a voucher would satisfy the CMHA’s obligation to provide permanent relocation assistance in cases where a household may be away from their permanent unit for a period of greater than 12-months.

I. PAYMENT OF RELOCATION BENEFITS

Should there be any payment of relocation assistance payments payable to the household the payment shall be made expeditiously. In order to receive any applicable replacement housing payments, the Household must rent and occupy a decent, safe and sanitary Replacement Dwelling within twelve (12) months after they vacate their current unit. All households eligible to receive a payment must submit claims and supporting documentation for relocation benefits to the relocation team no later than eighteen (18) months after the date they vacate the Project in order to remain eligible for payment.

A sample claim for is provided in Appendix E of this Plan. The procedure for the preparation and filing of claims and the processing and delivery of payments shall be as follows:

1. Claimant(s) shall provide all necessary documentation to substantiate eligibility for assistance;

2. The relocation team shall review all necessary documentation before reaching a determination as to which expenses are eligible for compensation;
3. Required claim forms shall be prepared by the relocation team and be presented to the claimant for review and signature. Signed claims and supporting documentation shall be returned to relocation staff for processing of payment;
4. The relocation team shall review and approve claims for payment or request additional information;
5. The relocation team shall issue benefit checks to claimants in the most secure, expeditious manner possible;
6. Receipts of payment and all claims materials shall be maintained in the relocation case file;
7. In cases where a relocated Household disputes the amount of payment it is awarded in the claim, they may make a written appeal in accordance with the appeals process defined in Section L of this plan. Further details regarding the appeals process and a sample appeals request form is provided in Appendix F of this Plan.

J. LAWFUL PRESENCE IN THE UNITED STATES

Federally-funded relocation projects require that all persons self-certify their lawfully present status in the United States in order to receive relocation assistance under the URA.

All eligible households in Good Standing shall receive relocation assistance. In cases where a household includes persons not lawfully present in the United States, such Household shall receive relocation assistance under the CRAL and the Guidelines.

Should Section 104(d) apply to the Project as a result of the use of HOME or CDBG funds, the federal lawful presence requirements shall not apply and all eligible Households shall receive assistance under Section 104(d).

K. EVICTION POLICY

It is recognized that eviction is permissible only as a last resort and that relocation records must be documented to reflect the specific circumstances surrounding any eviction. Eviction shall only take place in cases of nonpayment of rent; a serious

violation of the rental agreement; a dangerous or illegal act in the unit; violation of federal, state, or local laws; or, if the household refuses all reasonable offers to move.

L. APPEALS POLICY

The appeals policy and grievance procedures shall follow the standards described in the URA. Briefly stated, a relocated household shall have the right to ask for review when there is a perceived grievance regarding any of such household's rights to relocation and relocation assistance, including the determination as to eligibility, the amount of payment, or the failure to provide a comparable referral to a Replacement Dwelling. Appendix F provides a full description of the appeals process.

Should the appellant and CMHA not be able to resolve the appeal, the appellant may forward an appeal to the agency's Administrative Appeals Board. CMHA's Administrative Appeals Board shall have the right to make the final determination regarding appeals.

M. PROJECTED RELOCATION SCHEDULE AND PHASING PLAN

Phasing Plan

The phasing plan has not been determined at this time. This plan will be updated with a detailed phasing plan at a later date.

General Relocation Schedule

The general relocation planning and implementation schedule is shown below. The relocation schedule is subject to change and shall be updated in future updates to this Plan.

- Relocation Plan Development: May 2016 to February 2017
- Plan Public Comment Period: December 2016 to January 2017 2016
- Revise Relocation Plan per public comments and household interview data: February 2017
- Relocation Status Update Meetings With Tenants: Periodically 2016 to 2019
- Relocations: 2017-2019

The relocation schedule shall be developed in greater detail by the Relo Team once more detailed project schedules are available from CMHA. The relocation team shall

provide periodic schedule updates to the Households to keep them advised and informed of upcoming relocation activity that may affect them.

This Plan shall be updated if regulatory changes occur that impact the Project and relocation of the Households. The relocation team shall prepare phase specific relocation plans, which plans shall serve as the primary form of update and expansion of the content of this Plan. Each phase-specific relocation plan shall be consistent with the URA, Section 104(d), RAD Relocation Guidelines and CMHA policies.

N. RELOCATION COSTS

CMHA shall be obligated to fund all legally-required relocation costs and expenses regardless of the budget or anticipated costs set forth in the budget. CMHA cannot offer lesser relocation payments than those required by the URA in order to conform to the parameters of the preliminary budget that is included in the approved relocation plan. **This section of the Plan is expected to be updated once the Project's financing plan is completed.**

O. RESIDENT PARTICIPATION/PLAN REVIEW

This Plan is recommended to be circulated for a forty-five (45) calendar day public review and comment period.

This Plan shall be made available to each household and interested parties for a forty-five (45) calendar day review and comment period, and written comments shall be collected and evaluated by CMHA and OPC. Households shall receive a notice of this Plan's availability and a summary of this Plan. This notice shall be provided in languages other than English if necessary.

Non-RAD Phase I residents and other non-residents, including the Joint Residents Advisory Board (J-RAB), local public agencies, advocacy groups and other interested parties, shall also be invited to provide written comments to this Plan. CMHA anticipates meeting with neighborhood groups where CMHA residents may move temporarily, City, County, and State legislative groups, the Cincinnati Human Relations Commission, and community organizers.

The comment period shall be open until January 12, 2017

A copy of this Plan shall be available for review at the following locations (in the City of Cincinnati):

- CMHA Offices – 1627 Western Avenue
- Property Management Offices for Each Phase I Site
 - Beechwood - 330 Forest Avenue
 - Evanston - 1820 Rutland Avenue
 - Maple Tower – 601 Maple Avenue
 - Riverview - 2538 Hackberry Street
 - San Marco - 1601 Madison Road
 - Sutterview - 1990 Sutter Avenue

This Plan may also be accessed online at www.cintimha.com. A summary of the draft version of this Plan shall also be presented to the residents at site meetings within the forty-five (45) calendar day comment period.

This Plan shall be presented for approval to the CMHA Board in the fall of 2016. Further notice shall be provided to residents of the Project regarding the Board hearing.

Any written comments or questions received shall be included in Appendix G of the final version of this Plan to be presented to the Board for approval.

All written comments should be mailed, faxed, or emailed to:

Emily Cantor
Development Specialist Cincinnati Metropolitan Housing
Authority
1627 Western Avenue
Cincinnati, OH 45214
(513) 977-5606
Emily.Cantor@cintimha.com

P. Relocation Plan Compliance

Certification of Compliance: This Plan complies with HUD Notice H 2016-17 PIH/2016-17 (HA), the URA, and applicable fair housing and civil rights laws.

LIST OF APPENDICES:

A.	RELOCATION TERMS GLOSSARY	52
B.	APPLICABLE RELOCATION REGULATIONS.....	58
C.	RESIDENT ENGAGEMENT PROCESS MATERIALS	65
D.	PROPERTY LOCATION MAPS	67
E.	SAMPLE RELOCATION FORMS.....	80
F.	RELOCATION APPEAL/GRIEVANCE PROCEDURES	96
G.	COMMENTS/RESPONSES TO PLAN & COMMENT PERIOD DOCUMENT ...	104

DRAFT

A. RELOCATION TERMS GLOSSARY

GLOSSARY OF RELOCATION TERMS

30-Day Notice This is a notice that may be given to a person who shall be required to move a residence, business or personal property as a result of the Displacing Agency's project. It informs the person that he or she must move the residence, business or personal property thirty (30) calendar days from the date of the notice. This notice can only be given after a 90-Day Notice is given.

90-Day Notice This is a notice that may be given to a person who shall be required to move a residence, business or personal property as a result of the Displacing Agency's project. It informs the person that he or she must move the residence, business or personal property ninety (90) calendar days from the date of the notice. This notice can only be given after a Notice of Eligibility or other form of eligibility notice for relocation benefits has been given.

Comparable Replacement Dwelling The term *comparable replacement dwelling* means a dwelling which is:

(i) Decent, safe and sanitary; (ii) Functionally equivalent to the displacement dwelling. The term *functionally equivalent* means that it performs the same function, and provides the same utility. While a comparable Replacement Dwelling need not possess every feature of the displacement dwelling, the principal features must be present. Generally, functional equivalency is an objective standard, reflecting the range of purposes for which the various physical features of a dwelling may be used. However, in determining whether a Replacement Dwelling is functionally equivalent to the displacement dwelling, the Displacing Agency may consider reasonable trade-offs for specific features when the Replacement Dwelling is equal to or better than the displacement dwelling; (iii) Adequate in size to accommodate the occupants; (iv) In an area not subject to unreasonable adverse environmental conditions; (v) In a location generally not less desirable than the location of the person's dwelling with respect to public utilities and commercial and public facilities, and reasonably accessible to the person's place of employment;

(vi) On a site that is typical in size for residential development with normal site improvements, including customary landscaping. The site need not include special

improvements such as outbuildings; (vii) Currently available to the displaced person on the private market; and (viii) Within the financial means of the displaced person: A Replacement Dwelling rented by an eligible displaced person is considered to be within his or her financial means if, after receiving rental assistance under this part, the person's monthly rent and estimated average monthly utility costs for the Replacement Dwelling do not exceed the person's base monthly rental for the displacement dwelling; For a displaced person who is not eligible to receive a replacement housing payment because of the person's failure to meet length-of occupancy of occupancy requirements, a comparable Replacement Dwelling is considered to be within the person's financial means if a Displacing Agency pays that portion of the monthly housing costs of a Replacement Dwelling which exceeds the person's base monthly rent for the displacement dwelling. Such rental assistance must be paid under replacement housing of last resort. (ix) For a person receiving government housing assistance before displacement, a dwelling that may reflect similar government housing assistance. In such cases any requirements of the government housing assistance program relating to the size of the Replacement Dwelling shall apply.

Decent, Safe, and Sanitary Dwelling The term *decent, safe, and sanitary dwelling* means a dwelling which meets local housing and occupancy codes. However, any of the following standards which are not met by the local code shall apply unless waived for good cause by the Federal Agency funding the project. The dwelling shall: (i) Be structurally sound, weather tight, and in good repair; (ii) Contain a safe electrical wiring system adequate for lighting and other devices; (iii) Contain a heating system capable of sustaining a healthful temperature (of approximately 70 degrees) for a relocated person, except in those areas where local climatic conditions do not require such a system; (iv) Be adequate in size with respect to the number of rooms and area of living space needed to accommodate the relocated person. The number of persons occupying each habitable room used for sleeping purposes shall not exceed that permitted by local housing codes or, in the absence of local codes, the policies of the Displacing Agency. In addition, the Displacing Agency shall follow the requirements for separate bedrooms for children of the opposite gender included in local housing codes or in the absence of local codes, the policies of such Agencies; (v) There shall be a separate, well lighted and ventilated bathroom that provides privacy to the user and contains a sink, bathtub or shower stall, and a toilet, all in good working order and properly connected to appropriate sources of water and to a sewage drainage system. In the case of a housekeeping dwelling, there shall be a kitchen area that contains a fully usable sink, properly connected to potable hot and cold water and to a sewage

drainage system, and adequate space and utility service connections for a stove and refrigerator; (vi) Contains unobstructed egress to safe, open space at ground level; and (vii) For a relocated person with a disability, be free of any barriers which would preclude reasonable ingress, egress, or use of the dwelling by such relocated person.

Displaced Person (i) *General* the term *displaced person* means any person who moves from the real property or moves his or her personal property from the real property. This includes a person who occupies the real property prior to its acquisition, but who does not meet the length of occupancy requirements. (A) As a direct result of a written notice of intent to acquire, the initiation of negotiations for, or the acquisition of, such real property in whole or in part for a project; (B) As a direct result of rehabilitation or demolition for a project. (ii) *Persons not relocated*. The following is a nonexclusive listing of persons who do not qualify as displaced persons under this part: (A) A person who moves before the initiation of negotiations, unless the Displacing Agency determines that the person was relocated as a direct result of the program or project; (B) A person who initially enters into occupancy of the property after the date of its acquisition for the project; (C) A person who has occupied the property for the purpose of obtaining assistance under the Uniform Act; (D) A person who is not required to relocate permanently as a direct result of a project. Such determination shall be made by the Displacing Agency in accordance with any guidelines established by the Federal Agency funding the project, or as a result of the rehabilitation or demolition of the real property. (However, the displacement of a tenant as a direct result of any acquisition, rehabilitation or demolition for a federal or federally assisted project is subject to this part.); (E) A person who, after receiving a notice of relocation eligibility, is notified in writing that he or she shall not be relocated for a project. Such written notification shall not be issued unless the person has not moved and the Displacing Agency agrees to reimburse the person for any expenses incurred to satisfy any binding contractual relocation obligations entered into after the effective date of the notice of relocation eligibility.

Displacement The act of requiring a person to move permanently from the dwelling in which they occupy for a federally or State funded or sponsored project.

Displacement Dwelling The term displacement dwelling means the dwelling unit on the real property that the person permanently moves from or moves his or her personal property from the real property.

Displacing Agency The term displacing agency means any Federal Agency carrying out a program or project, and any State, State Agency, or person carrying out a program or project with federal financial assistance, which causes a person to be a displaced person.

Eligible Household/Resident a Household eligible for relocation assistance in accordance with the Uniform Relocation Act (URA).

Fixed Residential Moving Cost Schedule A schedule used to calculate the amount of reimbursement that relocated persons may be eligible to receive if they decide to move their own personal property. The Federal Highway Administration periodically updates and distributes this schedule. A copy can be found on our web site at: <http://www.fhwa.dot.gov/realestate/index.htm> in the section *Relocation Assistance*. Payment per this schedule is also known as a fixed move payment. This payment will be provided to permanently displaced persons or persons who may be temporarily relocated.

General Information Notice (GIN) A required notice under the Uniform Relocation Act (URA) that provides the household of their general relocation rights and advises them not to move or vacate from their unit until they receive a notification of their relocation eligibility.

Good Standing means that a Household is the lawful tenant of an existing unit and has not been evicted or served with a summons and complaint for eviction by CMHA by the time the household receives a written notification of its relocation benefits, which is issued to the household at least 90 days before it is time for the household to move.

In-Eligible Household/Resident A Household not eligible for relocation assistance in accordance with the Uniform Relocation Act or other applicable relocation law.

Household means one or more persons occupying an existing housing unit.

Low-income Families means families whose annual incomes do not exceed 80 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD findings that such

variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Memorandum of Understanding (MOU) The term Memorandum of Understanding is used to describe the document that explains the temporary relocation benefits to be provided to an occupant of a residential dwelling unit that is required to move from the unit temporarily until the occupant is permanently relocated. The MOU shall be provided the occupant for review and signature prior to the expected move date.

Move In Notice A notice or lease addendum signed at the time of move-in to the households unit that explains that they may be required to relocate for a project and that they may not receive relocation assistance.

Notice of Eligibility (NOE) The term Notice of Eligibility, also referred to as an NOE, is the written description of the type of permanent relocation benefits and the monetary amount(s) of those benefits a displaced person is eligible to receive under the appropriate relocation statutes or laws (for example the URA.) This notice can be given prior to the approval of the relocation plan as deemed appropriate by the Displacing Agency.

Relocation The act of moving permanently or temporarily from a dwelling unit as a result of a federally or State funded or sponsored project where the URA or other relocation statutes or laws are triggered.

Rent Differential Payment Amount of assistance paid to a displaced person, who is a renter, to compensate for the difference between the monthly rent and utility payment that they shall pay at the Replacement dwelling unit and what was paid for rent and utilities at the displacement dwelling. This difference is calculated over a forty-two (42) month period, unless Section 104(d) applies. If Tenant-based Rental Assistance such as Section 8 Housing Choice Voucher is available to the displaced person, that amount of assistance shall offset a portion of the difference and any un-met portion of the difference is eligible to be paid a rent differential payment. The payment must be claimed within eighteen (18) months after the displaced person moves from the displacement dwelling. Also referred to as a Rental Assistance Payment ("RAP") or Replacement Housing Payment ("RHP").

Replacement Dwelling (Applicable to Permanent Relocation in The Context of This Plan) A replacement dwelling is the unit the displaced person elects to move to from the displacement dwelling. A displaced person must locate and move into a replacement dwelling within twelve (12) months of the date they vacate the displacement dwelling to claim a RAP.

Tenant-based Rental Assistance is a form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. Tenant-based rental assistance under this part also includes security deposits for rental of dwelling units. A common form of Tenant Based Rental Assistance is a Section 8 Housing Choice Voucher.

Uniform Act Relocation (URA) The term *Uniform Act* means the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Pub. L. 91–646, 84 Stat. 1894; 42 U.S.C. 4601 *et seq.*), and amendments thereto. Also known as the URA.

B. APPLICABLE RELOCATION REGULATIONS

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Permanent Relocation Assistance for Relocated Public Housing Tenants: URA and RAD Relocation Requirements¹

	URA	RAD
Relocation Plan	<p>Must plan for relocation which may include conducting a survey of needs including:</p> <ul style="list-style-type: none"> • Estimate of the number of households to be relocated including information such as owner/tenant status, estimated value and rental rates of properties to be acquired, family characteristics, and special consideration of the impacts on minorities, the elderly, large families, and persons with disabilities when applicable • Estimate of comparable replacement housing available (including price ranges and rental rates). • Consideration of any special relocation advisory services that may be necessary from the housing authority and other cooperating agencies. <p>No formal plan documents are required, and no approval process is required.</p>	<ul style="list-style-type: none"> • Written relocation plan is not required but strongly encouraged • Must conform w/ URA 49 CFR 24.205(a) • Relocation budget • Certificate of URA Compliance <p>The Relocation Plan should provide a general description of and purpose for the project (e.g., year built, location, # of units, configuration, occupancy information, and funding sources.)</p> <p>The basic components of a plan include:</p> <ul style="list-style-type: none"> • A general description of the project and the site, including acq., demolition, rehab, and construction activities and funding sources; • A detailed discussion of the specific steps to be taken to minimize the adverse impacts of relocation, including when transferring the assistance to a new site; • Info on occupancy (including the # of residents, residential owner-occupants and non-residential occupants, if any, to be permanently or temp relocated); • Info on relocation needs and

¹ Section 18 of the U.S. Housing Act of 1937, and implementation regulations at 24 CFR Part 970) (collectively, "Section 18"); the Uniform Relocation Act (46 U.S.C. §4600 et seq.), and its implementation regulations (49 CFR Part 24)(collectively, "URA"); RAD is subject to the URA.

	URA	RAD
		<p>costs (including the # of residents who plan to relocate with Section 8 assistance);</p> <ul style="list-style-type: none"> • General moving assistance info; • Temp move assistance (including info on duration of temp moves); • Permanent move assistance; and • Appeals process
<p>Moving & Related Expenses (PHA unit move to a PHA unit)</p>	<p>PHA choice!</p> <ul style="list-style-type: none"> • PHA move resident with force account staff or contractor (\$100 allowance to resident), or allow resident to choose: <ul style="list-style-type: none"> ○ Payment for actual costs of a self-move, or ○ Payment for self-move at DOT schedule amount <p>Or</p> ○ A combination of both 	<p>PHA choice!</p> <ul style="list-style-type: none"> • PHA move resident with force account staff or contractor (\$100 allowance to resident), or allow resident to choose: <ul style="list-style-type: none"> ○ Payment for actual costs of a self-move, or ○ Payment for self-move at DOT schedule amount <p>Or</p> ○ A combination of both • PHA responsible for covering all reasonable moving expenses incurred in connection with temporary relocation of a resident. • The PHA will not make fixed payments since such payments may not be representative of actual reasonable costs incurred. However, in order for a resident to be sure of full reimbursement, the resident should submit a moving cost estimate to the PHA for approval prior to the move unless the PHA is directly carrying out the move and the resident will incur any reasonable out-of-pocket moving expenses.

CMHA Draft RAD Conversion – Phase I Programmatic Resident Relocation Assistance Plan

	URA	RAD
Moving & Related Expenses (PHA unit move to non-public housing—with or without Voucher assistance)	<p>Resident's choice!</p> <ul style="list-style-type: none"> • Payment for actual costs of a Self-move, or • Payment for self-move at DOT schedule amount, or • A combination of both. <p>(Optional) PHA may offer to move resident with force account staff or contractor (\$100 allowance to resident)</p>	<p>Resident's choice!</p> <ul style="list-style-type: none"> • Payment for actual costs of a Self-move, or • Payment for self-move at DOT schedule amount, or • A combination of both. <p>(Optional) PHA may offer to move resident with force account staff or contractor (\$100 allowance to resident)</p>
Replacement Housing	<ul style="list-style-type: none"> • Offer comparable replacement dwelling which may be: <ul style="list-style-type: none"> ○ Tenant based assistance (voucher) ○ Project-based assistance ○ Public housing unit 	<ul style="list-style-type: none"> • Offer comparable replacement dwelling which may be: <ul style="list-style-type: none"> ○ Tenant based assistance (voucher) ○ Project-based assistance Public housing unit ○ Homeownership housing ○ Private-market rental housing (affordable, non-subsidized).
Replacement Housing Payment (RAP)	<ul style="list-style-type: none"> • Computed on 42-month period • Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or (for low income persons only, 30% of gross monthly income) • "Gap" payments may be necessary even between old PHA rent/utilities and new subsidized rent/utilities 	<ul style="list-style-type: none"> • Computed on 42-month period • Amount needed to reduce new rent/utility costs to the lower of old rent/utility costs or (for low income persons only, 30% of gross monthly income) • "Gap" payments may be necessary even between old PHA rent/utilities and new subsidized rent/utilities
Notices	<ul style="list-style-type: none"> • General Information Notice (GIN) 	<ul style="list-style-type: none"> • General Information Notice (GIN)

	URA	RAD
	<ul style="list-style-type: none"> • Notice of Eligibility or Non-displacement at ION • 90 day notice to vacate 	<ul style="list-style-type: none"> • RAD Notice of Relocation • Notice of Intent to Acquire • URA Notice of Relocation Eligibility-for residents whose temporary relocation exceeds one year • 90 day notice to vacate
Services	<ul style="list-style-type: none"> • Advisory services <ul style="list-style-type: none"> ○ Determine resident needs and preferences ○ Explain payments and assistance ○ Current and continuing information on comparable housing ○ Inspection of replacement housing ○ Assistance filling out claim forms ○ Mobility counseling ○ Transportation to inspect replacement housing ○ Advice on other assistance sources ○ Information on federal and state housing programs 	<ul style="list-style-type: none"> • Advisory services <ul style="list-style-type: none"> ○ Determine resident needs and preferences ○ Explain payments and assistance ○ Current and continuing information on comparable housing ○ Inspection of replacement housing ○ Assistance filling out claim forms ○ Mobility counseling ○ Transportation to inspect replacement housing ○ Advice on other assistance sources ○ Information on federal and state housing programs • May include housing counseling that should be facilitated to ensure that residents affected by the project understand their rights and responsibilities and the assistance available to them • Must also inform residents of their fair housing rights • PHAs should inform residents that if they believe they have experienced unlawful discrimination, they may contact HUD at 1-800-669-9777 (Voice) or 1-800-927-9275 (TDD) or at http://www.hud.gov.

	URA	RAD
Aliens not lawfully present in country	<ul style="list-style-type: none"> Aliens not lawfully in the country are not eligible for relocation benefits 	<ul style="list-style-type: none"> Aliens not lawfully in the country are not eligible for relocation benefits
Impact of eviction on eligibility	<ul style="list-style-type: none"> Persons who are evicted before or after initiation of negotiation are ineligible for benefits 	<ul style="list-style-type: none"> Persons who are evicted before or after initiation of negotiation are ineligible for benefits

DRAFT

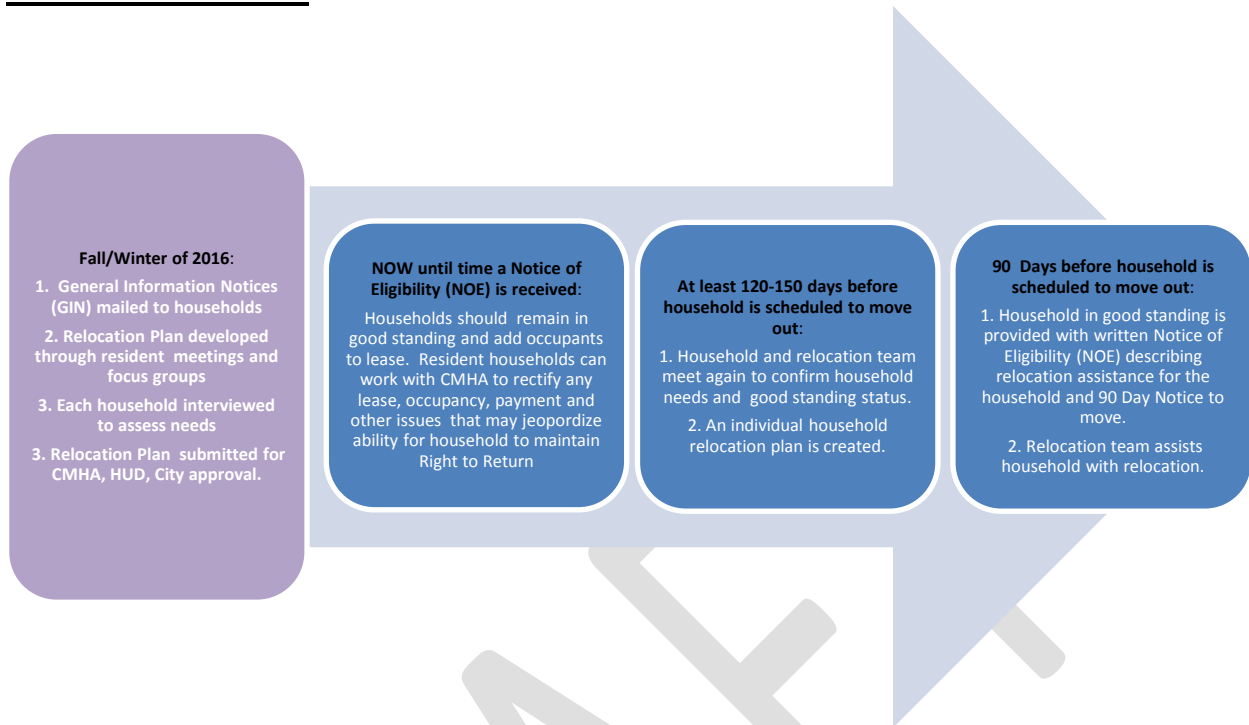
The following documents applicable to tenant relocation will be available for review at the Relocation Office

- Uniform Relocation Act, its implementing regulations (49 Code of Federal Regulations, Part 24).
- HUD Handbook 1378, Tenant Assistance, Relocation and Real Property Acquisition Act of 1970.
- Other funding program related relocation guidelines and regulations as necessary.
- Uniform Federal Accessibility Standards (UFAS)
- Government Code Section 12955.3 (Definition of disability)
- Admissions and Continued Occupancy Policy of the Authority (ACOP)
- Current proposed Architectural drawings
- Current proposed Project schedule
- Copies of all financing commitments obtained to date as received
- Phasing Plan

C. RESIDENT ENGAGEMENT PROCESS MATERIALS

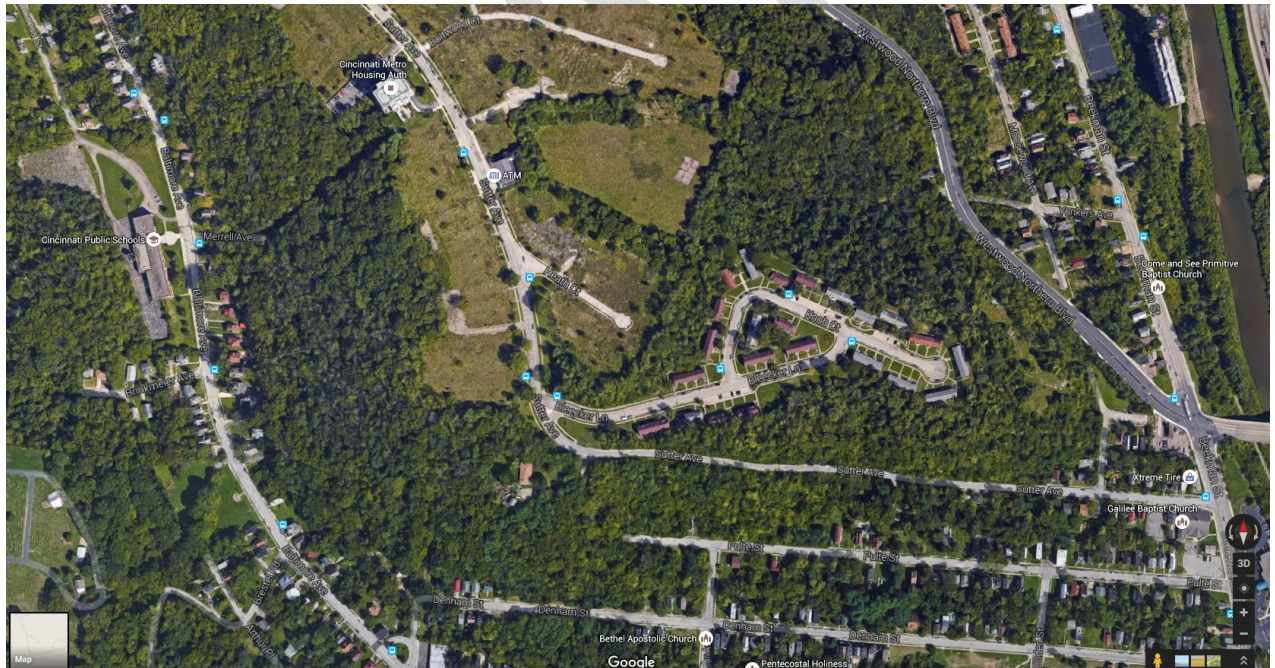
DRAFT

Relocation Timeline

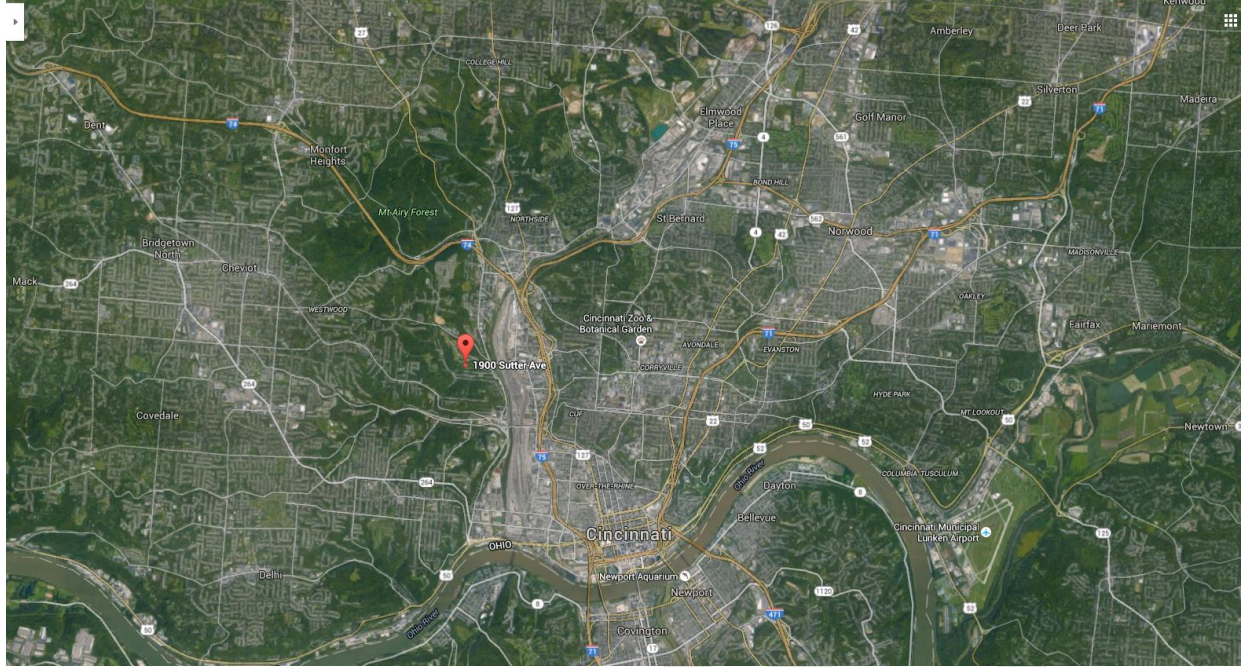


D. PROPERTY LOCATION MAPS

DRAFT



CMHA Draft RAD Conversion – Phase I Programmatic Resident Relocation Assistance Plan



DRAFT

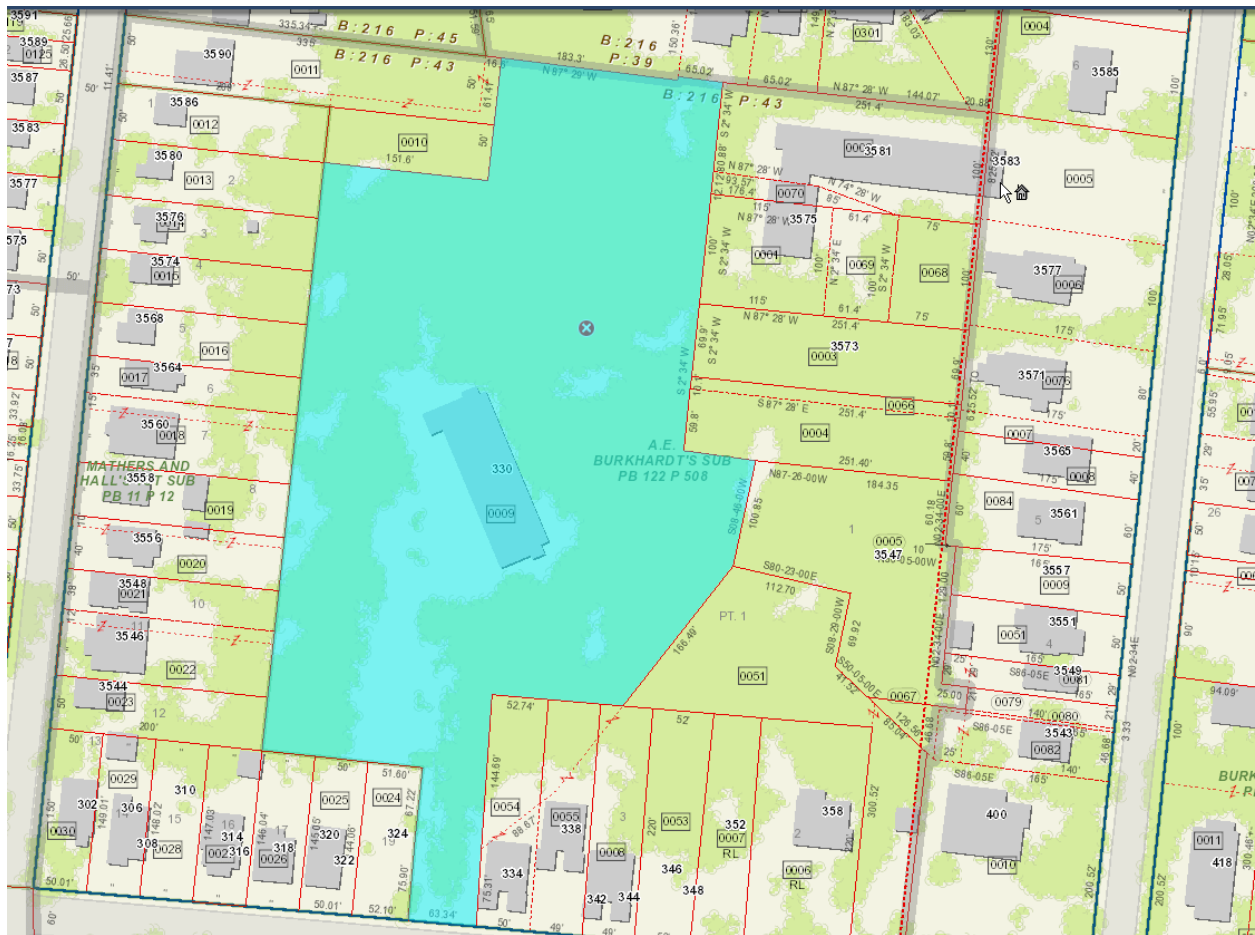
Beechwood

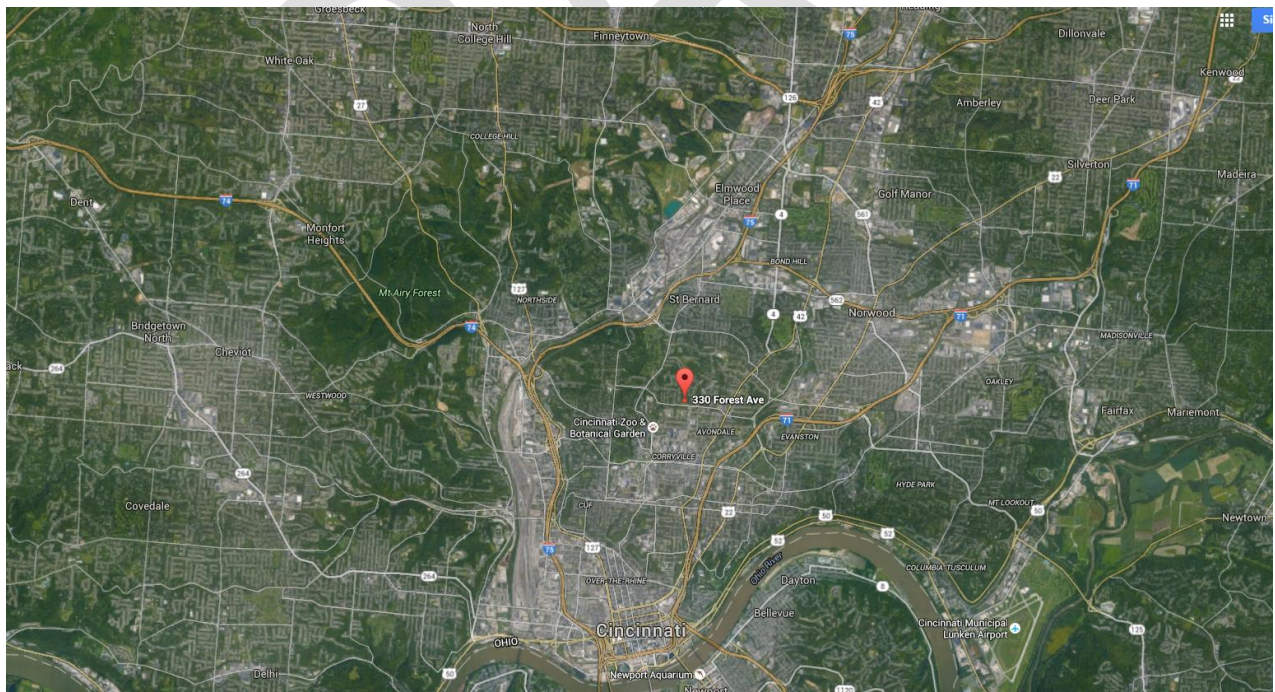
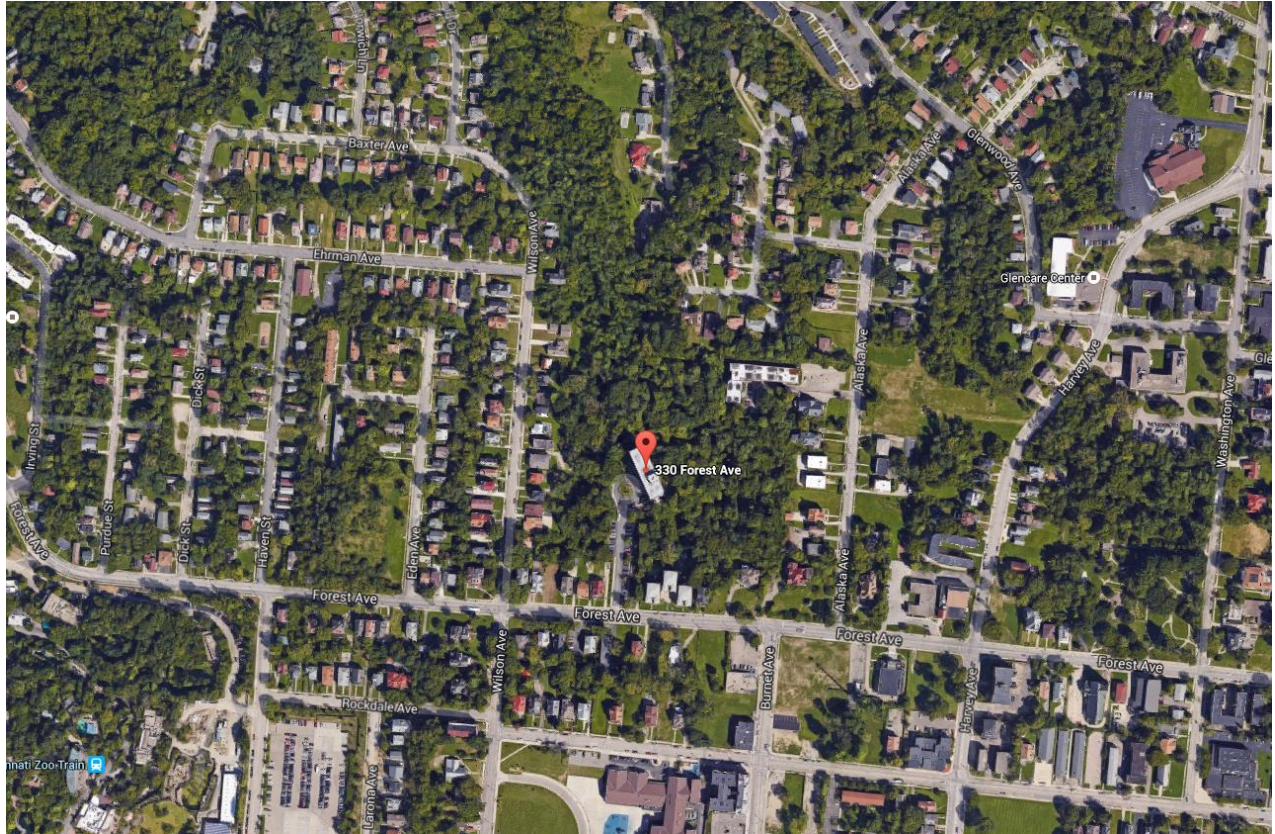
Address

330 Forest Avenue, Cincinnati, OH 45229

Permanent Parcel ID

216-0043-0009-90

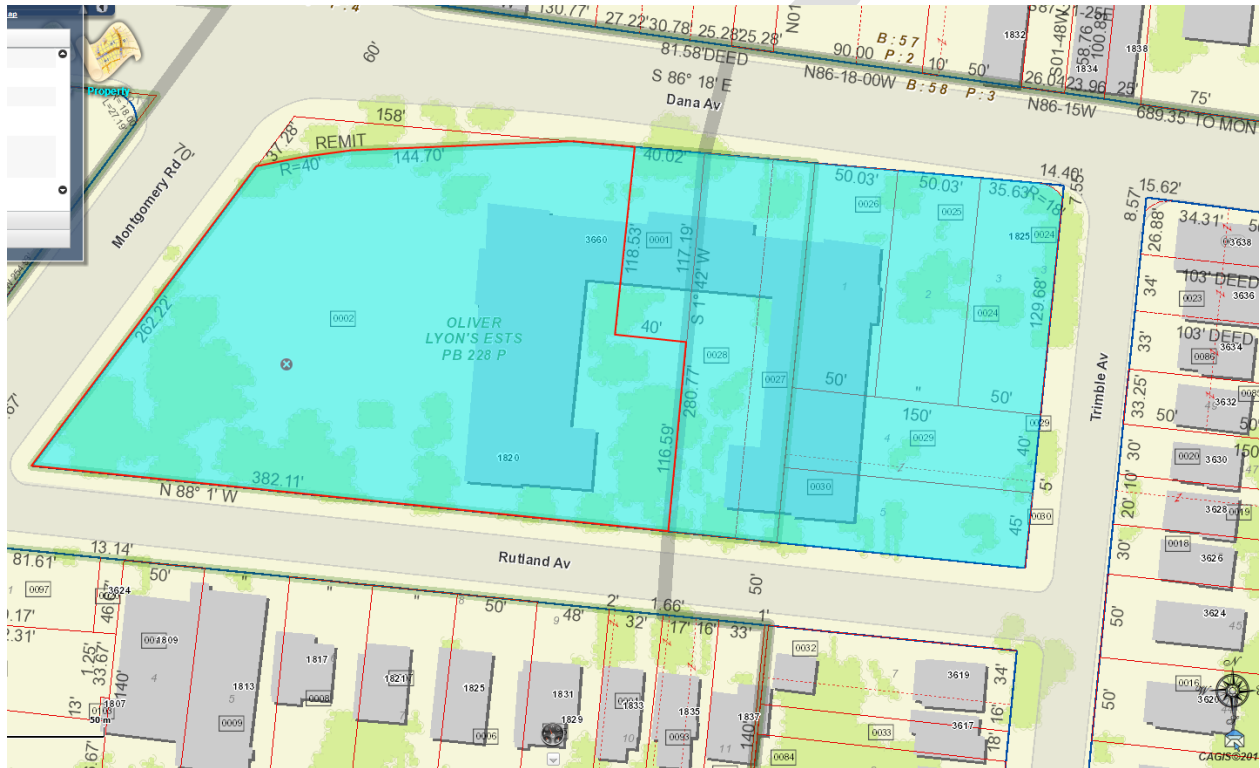




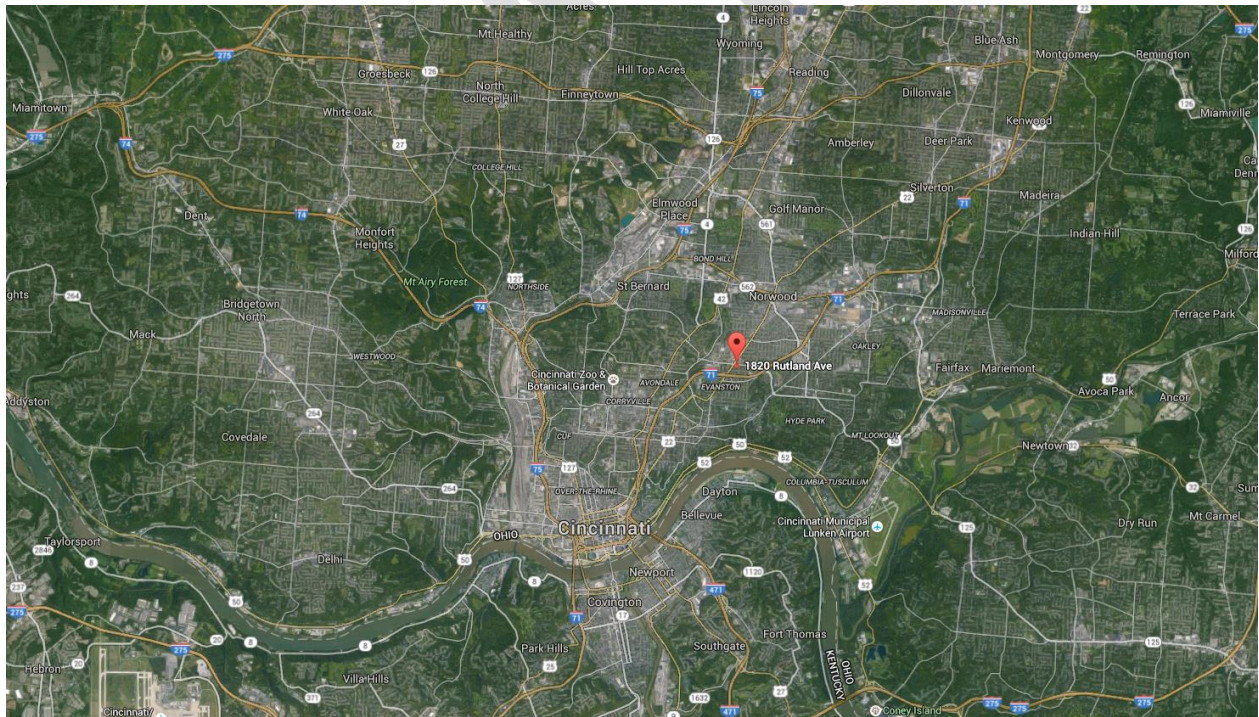
Evanston

Address 1820 Rutland Avenue, Cincinnati, OH
45207

Permanent Parcel ID 058-0003-0024-90



CMHA Draft RAD Conversion – Phase I Programmatic Resident Relocation Assistance Plan



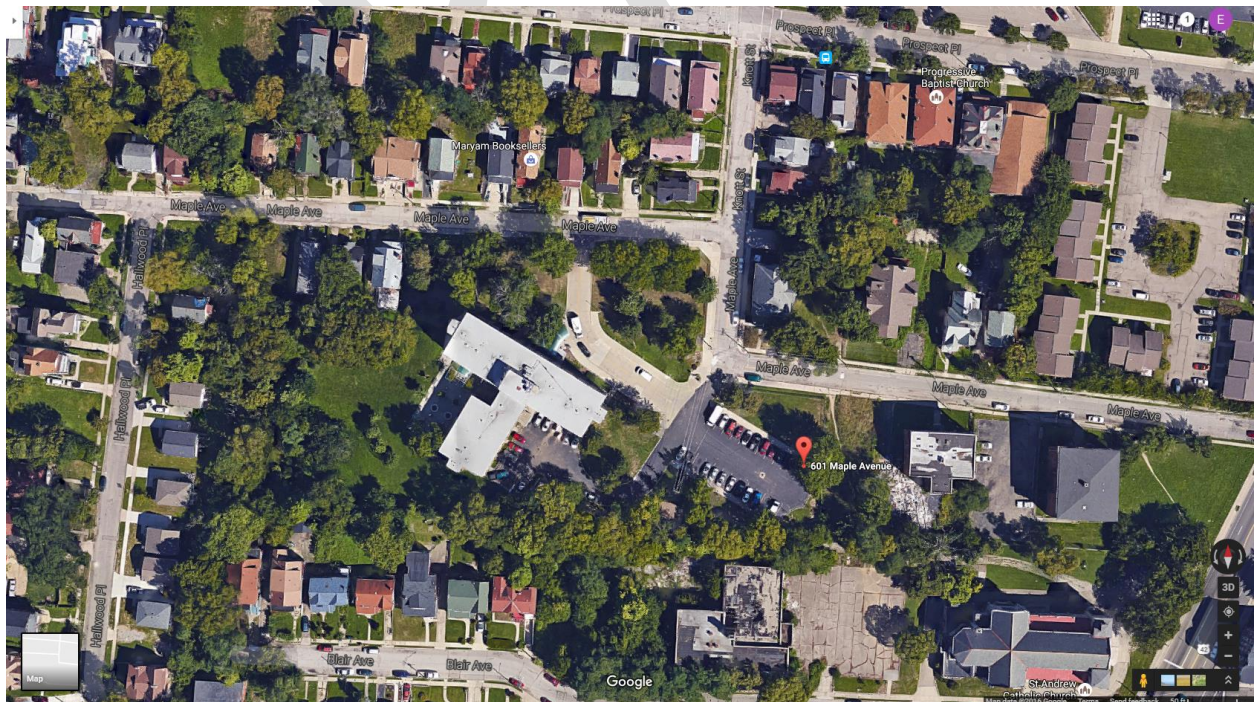
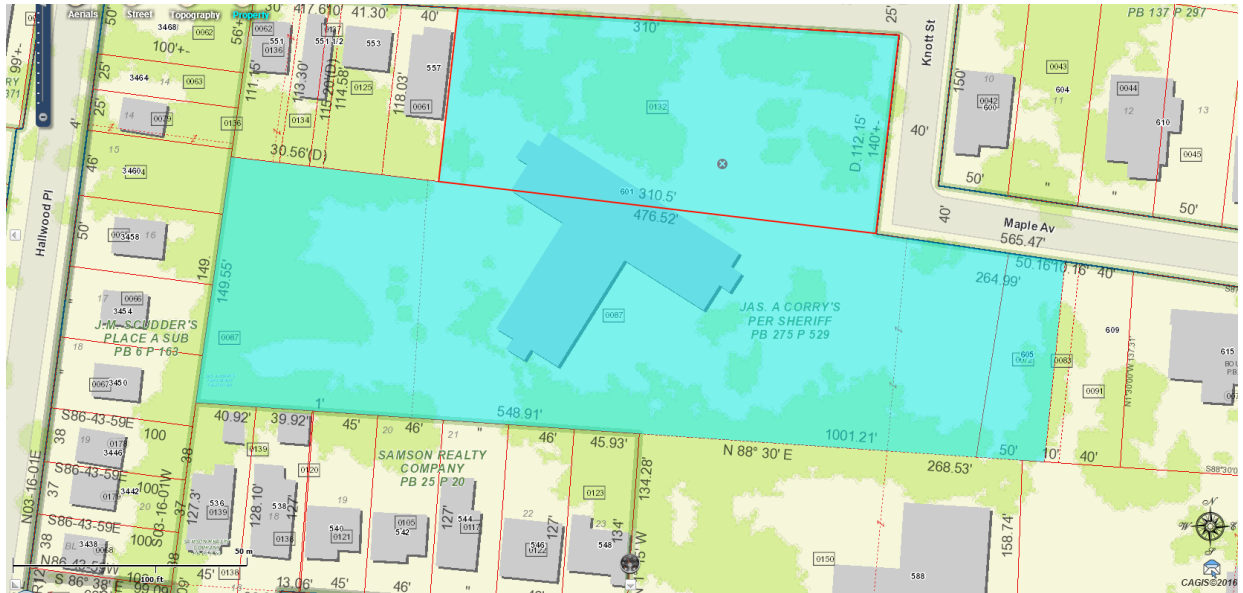
Maple Tower

Address

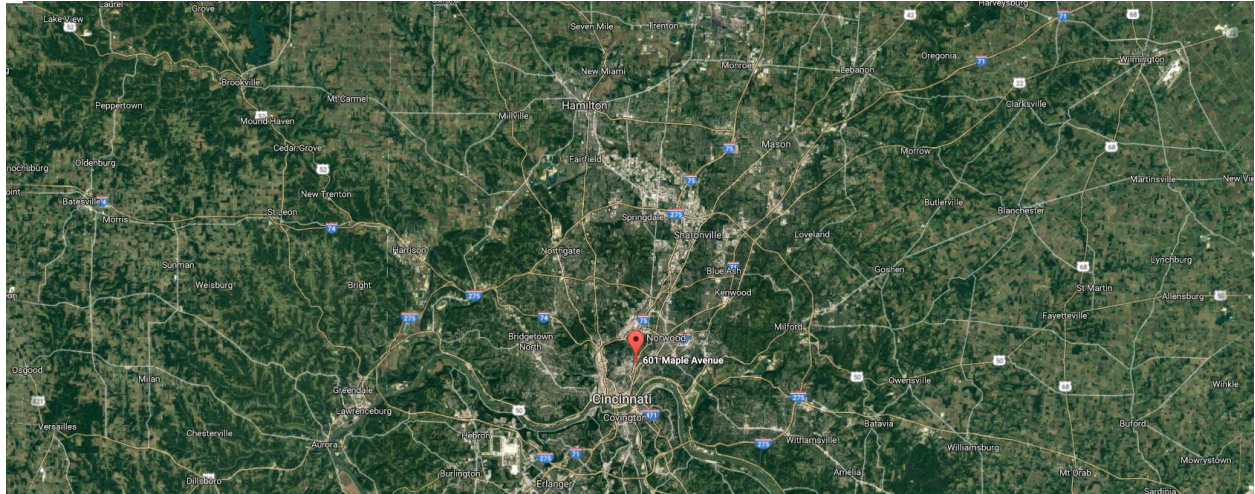
601 Maple Avenue, Cincinnati, OH 45229

Permanent Parcel ID

107-0008-0072-70



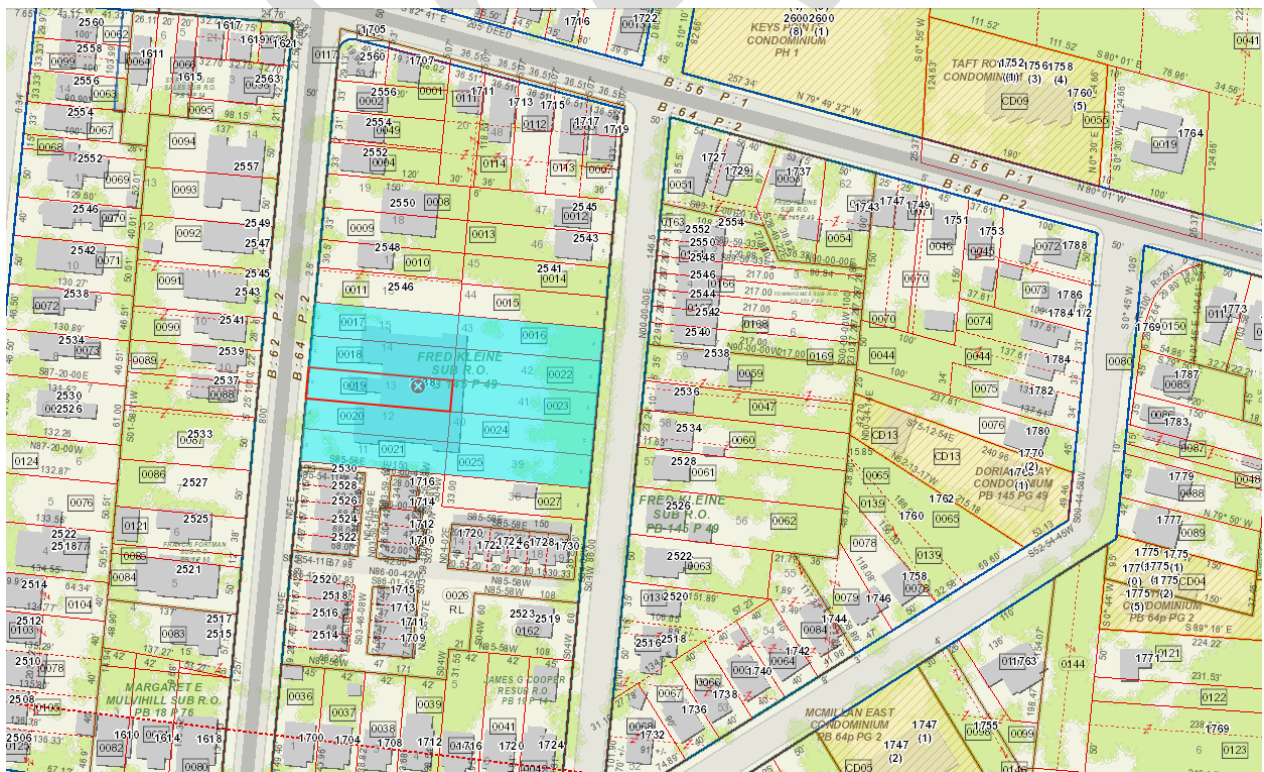
CMHA Draft RAD Conversion – Phase I Programmatic Resident Relocation Assistance Plan



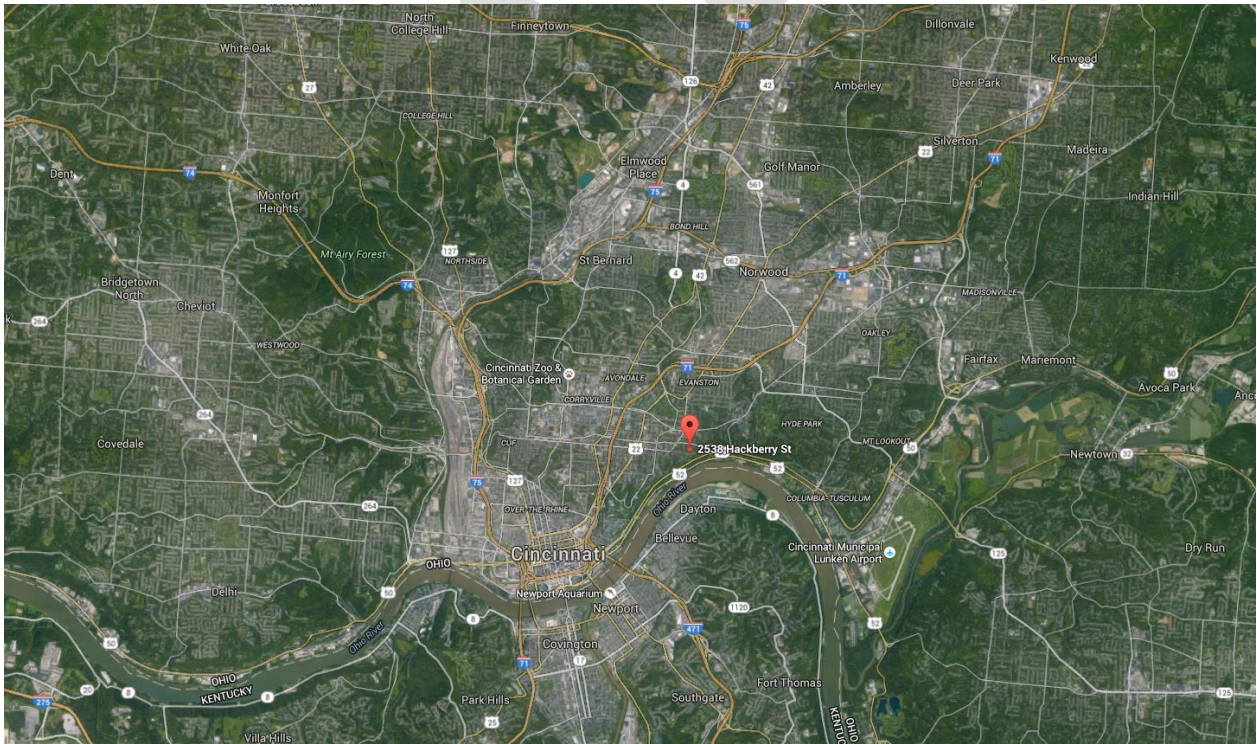
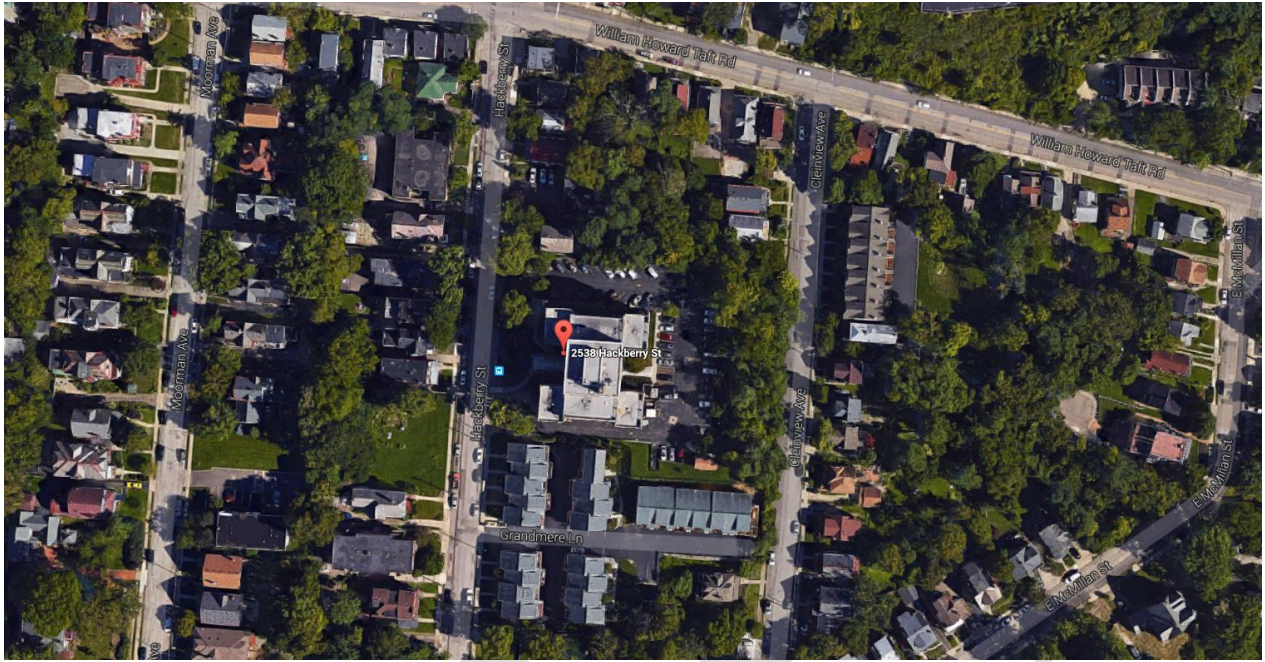
Riverview

Address 2538 Hackberry Street, Cincinnati, OH 45206

Permanent Parcel ID 064-0002-0016-90



CMHA Draft RAD Conversion – Phase I Programmatic Resident Relocation Assistance Plan



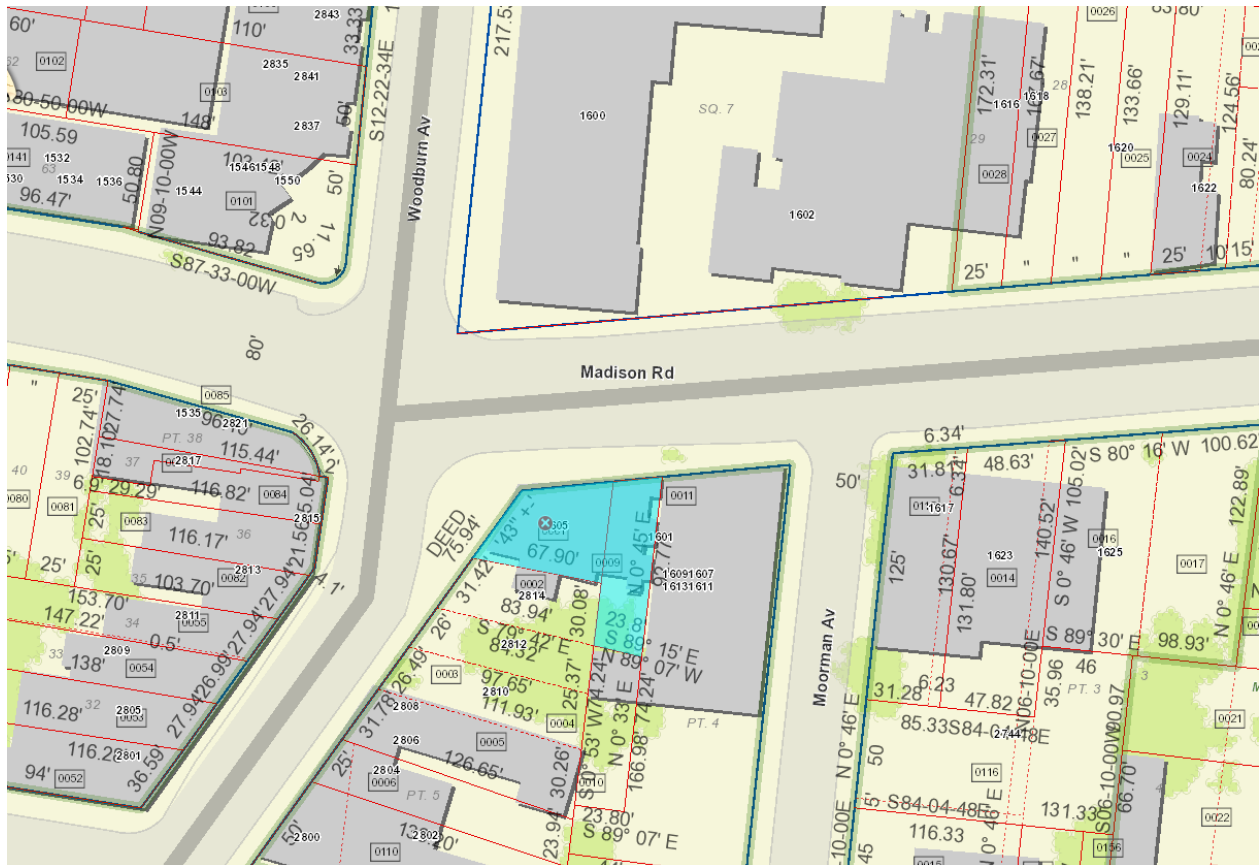
San Marco

Address

1601 Madison Road, Cincinnati, OH 45206

Permanent Parcel ID

062-0003-0001-90





E. SAMPLE RELOCATION FORMS

DRAFT

SAMPLE RAD RELOCATION NOTICE

PHA Letterhead

[Date]

[Head of Household] and All Other Lawful Occupants
[Address]

Dear [*Head of Household*]:

The property you currently occupy at the CMHA property is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program.

[SELECT THE APPLICABLE PARAGRAPH BELOW]

On [date], the Cincinnati Metropolitan Housing Authority ("CMHA") notified you of proposed plans to rehabilitate the property you currently occupy at [address]. On [date], HUD issued the RAD Conversion Commitment (RCC) and committed federal financial assistance to the project. In order for CMHA to complete the project, you will need to be relocated for [*anticipated duration of relocation*]. Upon completion of the project, you will be able to lease and occupy another decent, safe and sanitary (DS&S) unit in the completed project under reasonable terms and conditions. You are eligible for relocation assistance and payments. If your relocation will exceed one year, you have the choice to either:

- Receive temporary relocation assistance and move to a newly constructed unit in the RAD project once it is complete; or
- Receive permanent relocation assistance and payments consistent with the URA instead of returning to the completed RAD project.

You must inform us of your choice within 30 days.

However, you do not need to move now. If you choose temporary relocation assistance, you will not be required to move sooner than 30 days after you receive notice that a temporary unit is available for you. If you choose permanent relocation assistance, you will not be required to move sooner than 90 days after you receive written notice that at least one comparable replacement unit is available to you in accordance with 49 CFR 24.204(a).

If you choose temporary relocation, your relocation exceeds one year and you qualify as a "displaced person" under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), you may become eligible for further relocation assistance and payments under URA. However, you will also have the opportunity to

continue residing in the temporary relocation housing unit made available to you for the duration of the period required to construct a new housing for you.

NOTE: Aliens not lawfully present in the United States are not eligible for URA relocation assistance, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child as defined at 49 CFR 24.208(h). All persons seeking relocation assistance will be required to certify that they are a United States citizen or national, or an alien lawfully present in the United States.

If you choose to receive temporary relocation assistance, this assistance will include:

- Temporary Housing, which may be on or off-site that will be decent, safe and sanitary. Should there be increased cost for this unit; CMHA will pay those costs on your behalf. You will be notified of its location at least 30 days prior to your move date.
- Payment for Moving Expenses. You are entitled to be reimbursed for all reasonable out-of-pocket expenses incurred in connection with any temporary move or have the moving cost paid on your behalf. Moving cost include the cost of material, labor, equipment and insurance necessary to move you to temporary housing and any utility transfer fees.
- Advisory services including but not limited to assistance coordinating your move, making requests for reasonable accommodations, preparing any necessary claim forms, and other services your household may require related your relocation.

If you elect to receive permanent relocation assistance, this assistance will include:

- Relocation Advisory Services. You are entitled to receive current and continuing information on available comparable replacement units and other assistance to help you find another home and prepare to move.
- Payment for Moving Expenses. You will be able to elect to have a professional moving company move your household goods to your replacement housing unit. This service will be paid for on your behalf by CMHA. Or you may choose your own mover. The movers cost cannot exceed the lowest responsible bid received by CMHA. You will be required to enter into a self-move agreement should you elect to hire your own mover. Or you may elect a fixed move payment based on the current federal fixed move payment schedule provided below, which is based on the number of moveable rooms. Your relocation specialist will calculate this payment for you and prepare the appropriate claim form.

Fixed Move Payment Schedule – State of Ohio

# of Moveable Rooms	Typical Unit Size Equivalent	Payment Amount
---------------------	------------------------------	----------------

2 Rooms	Typical Studio	\$800
3 Rooms	Typical 1 BR	\$1,000
4 Rooms	Typical 2 BR	\$1,150
5 Rooms	Typical 3 BR	\$1,300
6 Rooms	Typical 4 BR	\$1,450
7 Rooms	Typical 5 BR	\$1,600
8 Rooms	Typical 6 BR	\$1,750
Additional Rooms	i.e. outdoor storage	\$265

|| Replacement Housing Payment – Section 8 Eligible. If a Section 8 Housing Choice Voucher is available and you are eligible for it, you will be notified under a separate notice. The HCV may satisfy all of your monthly housing cost. If you have increased out of pocket cost you may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

OR

Replacement Housing Payment – Non Section 8 Eligible. You may be eligible for a replacement housing payment to rent or buy a replacement home. The payment is based on several factors including: (1) the monthly rent and cost of utility services for a comparable replacement unit, (2) the monthly rent and cost of utility services for your present unit, and (3) 30% of your average monthly gross household income. This payment is calculated on the difference between the old and new housing costs for a one-month period and multiplied by 42.

Listed below are three comparable replacement units that you may wish to consider for your replacement home. If you would like, we can arrange transportation for you to inspect these and other replacement units.

Address Rent & Utility Costs Contact Info:

1. _____
2. _____
3. _____

[Applies to Non-Section 8 Eligible Occupants] We believe that the unit located at [address] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [\$ amount] and it will be used to calculate your maximum replacement housing payment.

Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a maximum replacement housing payment of approximately [$\$ (42 \times \text{monthly amount})$], if you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

You may choose to purchase (rather than rent) a decent, safe and sanitary replacement home. If you do, you would be eligible for a down-payment assistance payment which is equal to your maximum replacement housing payment, [$\$amount.$] Let us know if you are interested in purchasing a replacement home and we will help you locate such housing.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

[Applies to Section 8 Eligible Occupants] We believe that the unit located at [address] is most representative of your original unit in the converting RAD project. The monthly rent and the estimated average monthly cost of utilities for this unit is [$\$ amount$]. This rent and utility is within the current payment standard for the area. If Section 8 eligible rents increase, you may be entitled to additional relocation assistance. If this is the case, the information will be used to calculate your maximum replacement housing payment. Please contact us immediately if you believe this unit is not comparable to your original unit. We can explain our basis for selecting this unit as most representative of your original unit and discuss your concerns.

Based on the information you have provided about your income and the rent and utilities you now pay, you may be eligible for a replacement housing payment on the monthly rent differential amount between either 30% of your income or your current rent and utilities, and the contract rent for the replacement housing unit. If you rent the unit identified above as the most comparable to your current home or rent another unit of equal cost.

Replacement housing payments are not adjusted to reflect future rent increases or changes in income. This is the maximum amount that you would be eligible to receive. If you rent a decent, safe and sanitary home where the monthly rent and average estimated utility costs are less than the comparable unit, your replacement housing

payment will be based on the actual cost of that unit. All replacement housing payments must be paid in installments. Your payment will be paid in [#] installments.

Please note that all replacement housing must be inspected in order to ensure it is decent, safe and sanitary before any replacement housing payments are made.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [Name, Title, Address, Phone, Email Address] before you make any moving plans. He/she will assist you with your move to a new home and help ensure that you preserve your eligibility for all relocation payments to which you may be entitled. Please do not rent or purchase a replacement property prior to discussing your relocation assistance with us.

This letter is important to you and should be retained.

Sincerely,

Print name:

Title:

Enclosure/s

RESIDENT ACKNOWLEDGMENT OF RECEIPT/PROOF OF SERVICE

Received by Delivered on/by: _____ / _____

X _____
Recipient's Signature Posted on/by: _____ / _____

_____ Mailed/receipt received on: _____ / _____

SAMPLE 90 DAY NOTICE TO VACATE

Your Relocation Specialist

[Date]

Name:	<< NAME >>
Phone:	<< PHONE >>
Case ID:	<<CASE ID >>

[Head of Household] and All Other Lawful Occupants
[Address]

Dear [Head of Household]:

As you are aware the Cincinnati Metropolitan Housing Authority (CMHA) will soon commence with the rehabilitation (construction) stage of the RAD Conversion Program at the property where you presently reside.

You and your household were previously notified of the plans to rehabilitate the property you now occupy located at [Insert Address] ("Premises") in the RAD Relocation Notice delivered to you on [Insert Date]. At that time, you were advised the Project would require you to relocate from your current unit to a relocation housing unit identified for your household. We estimate that you will need to relocate for approximately [Anticipated Duration of Relocation]. When construction of a new unit that meets your household's needs is complete, you will be able to move into that new unit.

We will soon be ready to proceed with the demolition of your current unit and implement the relocation plan. You will be required to vacate the Premises prior to demolition activity commencing.

This is your 90 Day Notice to Vacate.

Notice is hereby given that CMHA elects to terminate your tenancy at the Premises on <<90DAY START>>. You are hereby to quit and deliver up possession of the property you occupy on or before <<90DAY END>>. If you do not vacate the Premises on that date, CMHA will initiate legal proceedings to recover possession of the Premises, along with any rents and damages. Such legal proceedings will jeopardize your rights to receive relocation assistance under the Uniform Relocation Act (URA) and RAD Relocation Guidelines.

Please be assured that you are eligible for assistance to help you relocate to relocation housing for the duration of the rehabilitation required to provide you with a renovated unit. This assistance includes the following:

- Relocation Housing** – You will be provided with a decent, safe and sanitary (DS&S) relocation housing unit. This housing will provide adequate sleeping area for all persons lawfully in the household as documented on your current lease. This unit may be located at the property or at an off-site location. This unit will be available to you for the entire period required for the construction of a new unit that meets your permanent

housing needs. Additional details about the housing assigned to your household and its responsibilities at the housing will be provided to you in your 30 Day Notice to Vacate and other documents prior to your move to the housing.

Moving Assistance – We have hired [*Name of Moving Company*] who will provide all moving services needed including material, labor and equipment necessary to pack and move you and your household to your relocation housing unit. Advanced packing materials will be made available to you upon request. The moving company will provide full value replacement insurance for the move. Relocation staff and a moving company representative will conduct a walk-through of the Premises prior to the move to ensure that they have the necessary labor, materials, and equipment available on move day. You are invited to accompany them and will receive advanced notice of this walk-through. Should you have any utility transfer fees, you shall be reimbursed the actual and reasonable costs as documented in an invoice or other proof of cost.

Storage – Storage of personal property is not anticipated to be necessary during the move. If storage becomes necessary it will be provided for you.

Further Notifications – You will be provided with a date certain 30-day Notice to Vacate. If the date in that notice changes for any reason, you will be notified of the revised date in a 7-day Notice to Vacate and/or other notifications.

Other Assistance Required – If you have any special needs that the Relocation Specialist indicated above should be aware of, please contact them immediately to make any arrangements or seek any Reasonable Accommodations you require.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Phone Number and E-mail of contact person*].

This letter is important to you and should be retained.

Name

Title

Signature

RESIDENT ACKNOWLEDGMENT OF RECEIPT/PROOF OF SERVICE

_____ Delivered on/by:

_____/_____

Received by
X _____ Posted on/by:

_____/_____

Recipient's Signature
_____ Mailed/receipt received on:

_____/_____

DRAFT

30 DAY NOTICE TO VACATE

[Date]

[Head of Household] and All Other Lawful Occupants
[Address]

Your Relocation Specialist	
Name:	<< NAME >>
Phone:	<< PHONE >>
Case ID:	<<CASE ID >>

Dear [Head of Household]:

As you are aware the Cincinnati Metropolitan Housing Authority (CMHA) will soon commence with the rehabilitation (construction) stage of the RAD Conversion Program at the property where you presently reside.

You and your household were previously notified of the plans to rehabilitate the property you now occupy located at [Insert Address] ("Premises") in the RAD Relocation Notice delivered to you on [Insert Date]. At that time, you were advised the Project would require you to relocate from your current unit to a relocation housing unit identified for your household. We estimate that you will need to relocate for approximately [Anticipated Duration of Relocation]. When construction of a new unit that meets your household's needs is complete, you will be able to move into that new unit.

We will soon be ready to proceed with the demolition of your current unit and implement the relocation plan. You will be required to vacate the Premises prior to demolition activity commencing.

This is your 30 Day Notice to Vacate.

Notice is hereby given that CMHA elects to terminate your tenancy at the Premises on <<30DAY START>>. You are hereby to quit and deliver up possession of the property you occupy on or before <<30DAY END>>. If you do not vacate the Premises on that date, CMHA will initiate legal proceedings to recover possession of the Premises, along with any rents and damages. Such legal proceedings will jeopardize your rights to receive relocation assistance under the Uniform Relocation Act (URA) and RAD Relocation Guidelines.

Please be assured that you are eligible for assistance to help you relocate to relocation housing for the duration of the rehabilitation required to provide you with a renovated unit. This assistance includes the following:

- Relocation Housing Location** – You will be provided with a relocation housing unit located at [Insert Address]. You will be required to sign a new lease/use agreement for

this relocation housing unit and you will be obligated to abide by all house rules for the property where it is located. This unit has been deemed to meet your household's needs and provide adequate sleeping space and accessibility features based on the documented needs of your household. If you disagree with this location you must notify your Relocation Specialist within 3 days of receipt of this notice.

Moving Assistance – We have hired [*Name of Moving Company*] who will provide all moving services needed including material, labor and equipment necessary to pack and move you and your household to your relocation housing unit. Advanced packing materials will be made available to you upon request. The moving company will provide full value replacement insurance for the move. Relocation staff and a moving company representative will conduct a walk-through of the Premises prior to the move to ensure that they have the necessary labor, materials, and equipment available on move day. You are invited to accompany them and will receive advanced notice of this walk-through. Should you have any utility transfer fees, you shall be reimbursed the actual and reasonable costs as documented in an invoice or other proof of cost.

Storage – Storage of personal property is not anticipated to be necessary during the move. If storage becomes necessary it will be provided for you.

Further Notifications – If the date within this notice changes for any reason, you will be notified of the revised date in a 7-day Notice to Vacate and/or other notifications.

Other Assistance Required – If you have any special needs that the Relocation Specialist indicated above should be aware of, please contact them immediately to make any arrangements or seek any Reasonable Accommodations you require.

If you disagree with any determinations in this notice, you may file a written appeal to the CMHA in accordance with the appeals procedures approved in the Master Relocation Plan. CMHA will provide you with complete appeals instructions upon request.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Phone Number and E-mail of contact person*].

This letter is important to you and should be retained.

Name

Title

Signature

RESIDENT ACKNOWLEDGMENT OF RECEIPT/PROOF OF SERVICE

_____ Delivered on/by:

_____/_____

Received by
X _____ Posted on/by:

_____/_____

Recipient's Signature
_____ Mailed/receipt received on:

_____/_____

DRAFT

**SAMPLE 7 DAY NOTICE TO VACATE
APPLICABLE TO RAD AND NON-RAD PROJECTS**

[Date]

[Head of Household] and All Other Lawful Occupants
[Address]

Your Relocation Specialist	
Name:	<< NAME >>
Phone:	<< PHONE >>
Case ID:	<<CASE ID >>

Dear [Head of Household]:

As you are aware the Cincinnati Metropolitan Housing Authority (CMHA) will soon commence with the rehabilitation (construction) stage of the RAD Conversion Program at the property where you presently reside.

You and your household were previously notified in the 30-day Notice to Vacate dated [Insert Date] of 1) The plans to rehabilitate the property you now occupy located at [Insert Address] ("Premises"); 2) The requirement to vacate your unit approximately 30-days from that notice; 3) The relocation assistance you would be provided and the location of your relocation housing; and 4) Your household's responsibility to vacate in accordance with that notice.

As stated in that notice, we estimate that you will need to relocate for approximately [Anticipated Duration of Relocation]. When construction of a new unit that meets your household's needs is complete, you will be able to move into that new unit.

We will soon be ready to proceed with the demolition of your current unit and implement the relocation plan. You will be required to vacate the Premises prior to demolition activity commencing.

This is your 7 Day Notice to Vacate.

Notice is hereby given that CMHA elects to terminate your tenancy at the Premises on << 7DAY START >>. You are hereby to quit and deliver up possession of the property you occupy on or before <<7DAY END >>. If you do not vacate the Premises on that date, CMHA will initiate legal proceedings to recover possession of the Premises, along with any rents and damages. Such legal proceedings will jeopardize your rights to receive relocation assistance under the Uniform Relocation and RAD Relocation Guidelines.

Please be assured that you are eligible for assistance to help you relocate to relocation housing for the duration of the rehabilitation required to provide you with a renovated unit. This assistance includes the following:

Relocation Housing Location – You will be provided with a relocation housing unit located at [Insert Address]. You will be required to sign a new lease/use agreement for this relocation housing unit and you will be obligated to abide by all house rules for the property where it is located. This unit has been deemed to meet your household's needs and provide adequate sleeping space and accessibility features based on the documented needs of your household.

Moving Assistance – We have hired [*Name of Moving Company*] who will provide all moving services needed including material, labor and equipment necessary to pack and move you and your household to your relocation housing unit. Advanced packing materials will be made available to you upon request. The moving company will provide full value replacement insurance for the move. Should you have any utility transfer fees, you shall be reimbursed the actual and reasonable costs as documented in an invoice or other proof of cost.

Storage – Storage of personal property is not anticipated to be necessary during the move. If storage becomes necessary it will be provided for you.

Further Notifications – If the date within this notice changes for any reason, you will be notified of the revised date in a 7-day Notice to Vacate and/or other notifications.

Other Assistance Required – If you have any special needs that the Relocation Specialist indicated above should be aware of, please contact them immediately to make any arrangements or seek any Reasonable Accommodations you require.

If you disagree with any determinations in this notice, you may file a written appeal to the in accordance with the appeals procedures approved in the Master Relocation Plan. CMHA will provide you with complete appeals instructions upon request.

If you have any questions about this notice and your eligibility for relocation assistance and payments, please contact [*Name, Phone Number and E-mail of contact person*].

This letter is important to you and should be retained.

Name

Title

Signature

RESIDENT ACKNOWLEDGMENT OF RECEIPT/PROOF OF SERVICE

_____ Delivered on/by:

_____/_____

Received by
X _____ Posted on/by:

_____/_____

Recipient's Signature
_____ Mailed/receipt received on:

_____/_____

DRAFT

SAMPLE
RELOCATION EXPENSE PAYMENT/REIMBURSEMENT
CLAIM FORM

Relocation Information

Project Name:
Claimant Name:
Project Address:
Temporary/Permanent Replacement Address:
Purpose/Type of Payment:
Backup Documentation Used in Calculation of Payment:
Total Payment Amount:
Issue Check Payable To:

Certification by Claimant: I certify that I have not submitted any other claim for the relocation payment listed and I have not been paid by any other source. Furthermore, I certify that by accepting the "Total Payment Amount" described above represents the entire claim for the relocation expense described above.

Claimant

Signature/Date: _____

Claim Approval

Payment Action (Initial Payment)	Initial Payment Amount	Signature	Date
Recommended			
Approved			

F. RELOCATION APPEAL/GRIEVANCE PROCEDURES

DRAFT

Purpose

The purpose of this procedure is to set forth the guidelines of the Cincinnati Housing Authority (“CMHA” or "Authority") for processing appeals to determinations as to relocation eligibility, the amount of a relocation payment, or the failure to provide comparable replacement housing referrals.

Right of Review

Any appellant, that is any person who believes him/herself aggrieved by a determination by the Authority as to eligibility, the amount of a relocation payment or failure to provide comparable replacement housing referrals, may, at his or her election, have his/her claim reviewed and reconsidered by the Authority in accordance with the procedures set forth herein, as supplemented by the procedures the Authority may establish for the conduct of hearings.

Notification to Appellant

If the Authority denies or refuses to consider a claim, the Authority's notification to the appellant of its determination shall inform the appellant of its reasons, and the applicable procedures for obtaining review of the decision. If necessary, such notification shall be printed in a language other than English.

Stages of Review by the Authority

(a) **Request for Further Written Information.** An appellant may request the Authority to provide him or her with a full written explanation of its determination and the basis therefore, if he/she feels that the explanation of the Authority's determination accompanying the payment of the claim or notice was incorrect or inadequate. The Authority shall provide such an explanation to the appellant within three (3) weeks of its receipt of his or her request.

(b) **Informal Oral Presentation.** An appellant may request an informal oral presentation before seeking formal review and reconsideration. A request for an informal oral presentation shall be filed with the Authority within the period described in subsection (d) of this section. The Authority shall afford the appellant the opportunity to make such presentation before a management-level

Authority staff person designated by the Executive Director and who has not previously participated in the relocation decision. The appellant may be represented by an attorney or other person of his/her choosing at his/her expense.

This oral presentation shall enable the appellant to discuss the claim with the designated Housing Authority staff person. The designated Authority staff person shall make a summary of the matters discussed in the oral presentation to be included as part of the Authority's file on the appellants relocation. The right to formal review and reconsideration shall not be conditioned upon requesting an oral presentation.

(c) **Written Request for Review and Reconsideration.** At any time within the period described in subsection (d) below, an appellant may file a written request with the Authority for formal review and reconsideration. The appellant may include in the request for review any statement of fact within the appellant's knowledge or belief or other material that may have a bearing on the appeal. If the appellant requests more time to gather and prepare additional material for consideration or review and demonstrates a reasonable basis therefore, the Authority may grant the appellants request by granting the appellant a definite period of time to gather and prepare materials.

(d) **Time Limit for Requesting Review.** An appellant desiring either an informal oral presentation or seeking formal review and reconsideration, shall make a request to the Authority within eighteen (18) months following the date he/she moves from the property.

Formal Review and Reconsideration by CMHA

(a) **General.** The Authority shall consider the request for formal review and shall decide whether a modification of its initial determination is necessary. This formal review shall be conducted by an independent arbitrator (the "Arbitrator"). The Arbitrator shall consider the appeal regardless of form, and the Authority staff shall, if necessary, provide assistance to the claimant in preparing the written claim. When a claimant seeks review, Authority staff shall inform him/her that he/she has the right to be represented by an attorney at the claimant's expense, to present his/her case by oral or documentary evidence, to submit rebuttal

evidence, to conduct such cross-examination as may be required for a full and true disclosure of facts, and to seek judicial review once he/she has exhausted the administrative appeal.

(b) **Scope of Review.** The Arbitrator shall review and reconsider the initial determination of the claimant's case in light of: (1) all material upon which the Authority based its original determination, including all applicable rules and regulations, except that no evidence shall be relied upon where a claimant has been improperly denied an opportunity to controvert the evidence or cross-examine the witness(es); (2) the reasons given by the claimant for requesting review and reconsideration of the claim; (3) any additional written or relevant documentary material submitted by the claimant; (4) any further information which the Arbitrator, in its discretion, obtains by request, investigation, or research, to ensure fair and full review of the claim.

(c) **Determination on Review.** The determination on review by the Arbitrator shall include, but is not limited to: (1) the Arbitrator's decision on reconsideration of the claim; (2) the factual and legal basis upon which the decision rests, including any pertinent explanation or rationale; and (3) a statement to the claimant that administrative remedies have been exhausted and judicial review may be sought. The determination shall be in writing with a copy provided to the claimant. The Arbitrator's decision shall be binding on the Authority.

(d) **Time Limits.** The Authority shall issue its determination on review as soon as possible but no later than six weeks from the date of the hearing. In the case of appeals dismissed for un-timeliness or for any other reason not based on the merits of the claim, the Authority shall furnish a written statement to the claimant stating the reason for the dismissal of the claim as soon as possible but not later than two weeks from receipt of the last material submitted by the claimant, or the date of the hearing, whichever is later.

Refusals to Waive Time Limitation

Whenever the Authority rejects a request by a claimant for a waiver of the time limits, the claimant may file a written request for reconsideration of this decision, except that such written request for reconsideration shall be filed within ninety (90) calendar days of the claimant's receipt of the Authority's determination.

Extension of Time Limits

The time limits specified may be extended for good cause by the Authority.

Recommendations by Third Party

Upon agreement between the claimant and the Authority, a mutually acceptable third party or parties may review the claim and make advisory recommendations thereon to the Authority for its final determination. In reviewing the claim and making recommendations to the Authority, the third party or parties shall be guided by the provisions of this Appeals/Grievance Procedure.

Review of Files by Claimant

Except to the extent the confidentiality of material is protected by law or its disclosure is prohibited by law, the Authority shall permit the claimant to inspect all files and records bearing upon his or her claim or the prosecution of the appellant's grievance.

If an appellant is improperly denied access to any relevant material bearing on his or her claim, such material may not be relied upon in reviewing the initial determination.

Effect of Determination on Other Persons

The principles established in all determinations by the Authority shall be considered as precedent for all eligible persons in similar situations regardless of whether or not a person has filed a written request for review. All written determinations shall be kept on file and available for public review.

Right to Counsel

Any aggrieved party has a right to representation by legal or other counsel at his or her expense at any and all stages of the proceedings set forth in this procedure.

Stay of Displacement Pending Review

If an appellant seeks to prevent displacement, the Authority shall not require the appellant to move until at least twenty (20) calendar days after the Authority has made a determination and the appellant has had an opportunity to seek judicial review. In all cases the Authority shall notify the appellant in writing, twenty (20) calendar days prior to the proposed new date of displacement.

Joint Appellants

Where more than one person believes themselves aggrieved by the failure of the Authority to refer them to comparable permanent replacement housing, the appellants may join in filing a single written request for review. A determination shall be made by the Authority for each of the appellants.

Judicial Review

Nothing in this Appeals/Grievance Procedure shall in any way preclude, or limit a claimant or the Authority from seeking judicial review of a claim upon exhaustion of such administrative remedies as are available herein.

RELOCATION ASSISTANCE APPEAL FORM

INSTRUCTIONS: This is an appeal of a determination made by the Displacing Agency under the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC §§4601 et. seq.). Complete this document, explaining the nature of your complaint and reasons for this appeal below. Attach extra pages if needed. You will be notified of the date when your complaint will be considered.

Claimant:		Agency:	
Site Address:		Project:	
Mailing Address:		Consultant:	
Phone number:		Case ID:	

Claimant Type: Residential Tenant	This appeal is based on: <input type="checkbox"/> Eligibility only <input type="checkbox"/> Amount of Payment only <input type="checkbox"/> Eligibility amount
Appeal Type: <input type="checkbox"/> Request for Further Written Information <input type="checkbox"/> Informal Oral Presentation <input type="checkbox"/> Formal Review and reconsideration	
Will you be present at the hearing?: <input type="checkbox"/> Yes <input type="checkbox"/> No	Will you be represented by counsel?: <input type="checkbox"/> Yes <input type="checkbox"/> No

.... continued next page.

Claimant's Statement:

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I certify that the information provided on this form is accurate and complete.

Claimant Signature

Date

G. COMMENTS/RESPONSES TO PLAN & COMMENT PERIOD DOCUMENT

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