

Curtis Apartments Relocation Plan

October 5, 2022

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I. INTRODUCTION

The Relocation Plan sets forth the procedures for relocating the residents of the Phase I of Curtis Apartments public housing development. This plan is written in accordance with the relevant provisions of the 49 CFR 24.2, HUD Handbook 1378--the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the URA), 42 U.S.C. Section 4601 *et seq* (URA) and its implementing regulations at 49 C.F.R. Part 24, as well as the requirements of HUD's Rental Assistance Demonstration (RAD) Program, included in HUD Notice 2016-17 and HUD Notice PIH 2012-32 (Rental Assistance Demonstration--Final Implementation, Revision 3, and Section 18 of the Housing and Community Development Act of 1937, 42 U.S. Code Chapter 1437p and its implementing regulations at 24 C.F.R. Part 970. This plan will also comply with the applicable requirements under state and local regulations, including M.G.L. Chapter 79A and implementing regulations at 760 CMR 27.00 *et seq.* (collectively, Governing Laws). Although the project has not currently applied for HOME or CDBG funding, it is possible that such funding will be sought as GAP funding. For this reason, this plan is also written in accordance with Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC 5304(d) and implementing regulations at 24 CFR Part 42.

The underlying objective of this plan is to ensure persons affected by this project are treated fairly, consistently and equitably so that they will not suffer disproportionate hardships as a direct result of activities designed for the benefit of the residents as a whole.

The Plan will be available to all Affected Residents at the Worcester Housing Authority Management office at Curtis Apartments at 32 Great Brook Valley Avenue, Suite 1, Worcester, MA 01605. Residents will be informed that they may submit written comments to WHA at the address provided below and/or the Bureau of Relocation at the Massachusetts Department of Housing and Community Development (DHCD) within 10 business days of the Plan's publication. Any comments submitted to WHA will be forwarded to the Bureau of Relocation within 5 business days.

Persons who may be contacted regarding this relocation plan include the following:

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II. EXISTING PROJECT SUMMARY

A. Background and Project Description

Built in 1950 in the City of Worcester’s Great Brook Valley neighborhood, the Worcester Housing Authority’s (WHA) Curtis Apartments was originally created to serve as affordable housing for veterans under the Department of Housing and Community Development’s (DHCD) Chapter 200 Program following World War II. A state public housing development, Curtis Apartments is the second-oldest property in the WHA portfolio and is comprised of 372 one-, two- and three-bedroom apartments in 62 buildings, housing 1,384 residents. Originally intended to be demolished 40 years after its construction, the development has been subject to several capital improvement projects over the years. Yet, despite these improvements, Curtis Apartments continues to deteriorate. Now over 70 years old, the apartments are very small, show signs of wear and tear and are no longer well-suited for today’s families.

WHA, in conjunction with its developer partner Trinity Financial, plans to undertake the redevelopment of Curtis Apartments over 4 Phases, containing a total of 526 new apartment apartments. Phase 1, (30-58 Great Brook Valley Avenue, Worcester, MA 01605) contains 90 units, which will be demolished and replaced with 129 units in 2 buildings. See below for the New Phase 1 unit mix. See **Appendix A, Site Maps** (Note: this unit mix is subject to change, although overall unit mix and total number of units will not change).

Curtis Apartments New Phase 1 Unit Mix

	1BR	2BR	3BR	Total
30% Section 18	-	12	42	54
RAD	3	26	7	36
30% WHA PBS8	3	6		9
60% LIHTC	5	5		10
80% LIHTC	9	11	-	20
Total	20	60	49	129

Anticipated and secured sources of funding for Curtis Apartments Phase 1 will include Federal and State LIHTC, infrastructure funding from MassWorks, DHCD: State and Federal 4% LIHTC; AHTE, HSF, ARPA, MassHousing workforce funds, City of Worcester: Affordable Housing Trust Fund (ARPA) and Project-Based Section 8 Vouchers.

See below chart for overall timeline of the Curtis Apartments Phase 1 redevelopment.

Phase	Demolition	Construction	New Units	Occupancy
Phase1	April 2023	Spring/Summer 2023	129	Winter/Spring 2025

Curtis Apartments residents in occupancy will relocate temporarily to either an on-site unit in a later phase of the development or off-site to another unit in the WHA portfolio during the reconstruction period. Residents that cannot be accommodated in WHA public housing units may receive a Section 8 mobile voucher and relocate to a unit in the private market. Each resident will be assisted per 49 CFR 24.2, HUD Handbook 1378--the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (the URA), 42 U.S.C. Section 4601 *et seq* (URA) and its implementing regulations at 49 C.F.R. Part 24, Section 104(d) of the Housing and Community Development Act of 1974, as amended, 42 USC 5304(d) and implementing regulations at 24 CFR Part 42, HUD's Rental Assistance Demonstration (RAD) Program, included in HUD Notice 2016-17 and HUD Notice PIH 2012-32 (Rental Assistance Demonstration--Final Implementation, Revision 3, Section 18 of the Housing and Community Development Act of 1937, 42 U.S. Code Chapter 1437p and its implementing

regulations at 24 C.F.R. Part 970 and M.G.L. Chapter 79A and implementing regulations at 760 CMR 27.00 *et seq.* (collectively, Governing Laws).

B. Re-occupancy

Returning Affected Residents of Curtis Apartments Phase 1 will have the option to move to a new unit in the revitalized Curtis Apartments and be prioritized for a unit in the newly redeveloped Phase 1 in accordance with financing program eligibility requirements, and any relevant income guidelines. Returning Curtis Apartments Phase 1 residents will not be subject to requirements additional to those required by the state public housing program.

At least 30 days in advance, each household will be notified of the availability of a unit that will accommodate their family size and documented unit feature needs. Each household will be required to accept or decline the unit offered in writing. Where too few units of any size are available to original Phase 1 residents who want to return, a system will be communicated and implemented to equitably determine the order in which original households will have priority to return. Residents will be contacted as units of the appropriate bedroom size come on-line. Households who do not move to the new Phase 1 will continue receiving their housing subsidy in the form of public housing accommodations or Section 8 mobile voucher and will be contacted for screening for a new unit in a subsequent phase of redevelopment of Curtis Apartments.

C. Current and Future/Projected Unit Mix

The proposed unit mix is based primarily on the needs of current Curtis Apartments Phase 1 households. The chart below summarizes the existing unit mix of the 69 occupied units in Phase 1 and the required bedroom size of the households currently living there, based upon WHA Management data. It does not take into account approved reasonable accommodations that would necessitate an additional bedroom. The **existing unit mix** of Curtis Apartments Phase 1 is as follows:

CURRENT BR SIZE	# UNITS	# OCCUPIED PHASE 1 UNITS	REQUIR ED BR SIZE (PH)	# HH's	REQUIRED BR SIZE (PBV)	# HH's
1BR	3	8	1BR	9	1BR	9
2BR	30	12	2BR	19	2BR	19
3BR	57	49	3BR	38	3BR	38
4BR			4BR	3	4BR	3

Total	90	69		69		69
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III. REDEVELOPMENT AND RELOCATION PHASING PLAN

It is anticipated that the relocation process for Phase 1 households will commence in October 2022 and be completed by the end of April 2023. Residents will be relocated for approximately 30 months, with units ready for re-occupancy in Winter/Spring 2025.

The following chart shows the existing Curtis Apartments Phase 1 households' unit size needs (both public housing and PBV) in comparison to the replacement unit mix:

BR SIZE	EXISTING BR SIZE NEED (PH)	EXISTING BR SIZE NEED (PBV)	NEW REPLACEMENT TOTAL UNITS
1BR	9	9	20
2BR	19	19	60
3BR	38	38	49
4BR	3	3	0
TOTAL	69	69	129

Of the 129 units, 5% of the units will be handicap-accessible.

IV. RESIDENT RELOCATION

All residents will be temporarily relocated and have the right to return to a redeveloped unit in Curtis Apartments. Under both URA and RAD regulations, residents who are being temporarily relocated for a period exceeding one-year have the option to choose whether they wish to take permanent relocation assistance and benefits or to continue to be temporarily relocated and return to a unit in the renovated project.

For residents who opt to relocate temporarily for more than one year, they will be relocated to an on-site unit in a subsequent phase of redevelopment, an off-site unit within the WHA portfolio or with a Section 8 mobile voucher to a unit in the

private market, in the event that there are no public housing units to which they may temporarily relocate. Their temporary relocation unit must be decent, safe and sanitary and meet their documented needs.

The following include the temporary relocation housing that will be offered to these Phase 1 residents;

- ***Transfer to another public housing unit within the WHA portfolio.*** The majority of households at Curtis Apartments will relocate temporarily to another WHA development, as vacancies arise. A much smaller subset of these households will relocate to a vacant on-site unit. WHA anticipates having an average of 7-8 vacancies per month in their portfolio. As displaced residents of Curtis Apartments Phase 1, these households will receive priority for an administrative transfer, going to the top of the waiting list for transfers to another WHA development, ahead of any other transfer type and new admissions.
- ***Housing Choice Voucher Program (HCVP).*** Eligible households for whom there is not a unit that meets their household needs within the WHA portfolio may be issued a Section 8 mobile voucher. HOU Relocation staff will assist the families in searching for voucher-eligible housing. In addition to meeting HQS requirements, a private market unit must meet the voucher payment standards established by WHA through Fair Market Rents (FMRs) or gross rent estimates that include the cost of rent plus all utilities.

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

For residents who opt to be permanently relocated, they will receive permanent relocation assistance and benefits consistent with the URA requirements which will include the offer of a comparable replacement dwelling and the relocation options detailed below.

Definition of Comparable Replacement Dwelling

All Affected Resident households must be relocated to a Comparable Replacement Dwelling (CRD). See 49 CFR 24.2(a)(6). Before they are required to relocate for the Project, residents must be offered at least one CRD, which may be identified in the 120-Day Notice to Relocate or in a further notice at least 30 days before the actual required move date. (See **Appendix F**)

All CRDs must be decent, safe and sanitary (See 49 CMR 24.2(a)(8)) and meet 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:

1. Be structurally sound, weathertight and in good repair;
2. Contain a safe electrical wiring system adequate for lighting and other devices;
3. Contain a heating system capable of sustaining a healthful temperature (of approximately 70 degrees) for a displaced person, except in those areas where local climatic conditions do not require such a system;
4. Be adequate in size with respect to the number of rooms and area of living space needed to accommodate the displaced 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;
5. 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;
6. Contains unobstructed egress to safe, open space at ground level; and
7. For a displaced person with a disability, be free of any barriers which would preclude reasonable ingress, egress, or use of the dwelling by such displaced person. (See appendix A, § 24.2(a)(8)(vii).)

A. Relocation Options

Residents who opt for permanent relocation assistance and benefits will be offered a unit within the WHA portfolio, unless there is not an available unit to meet the household's needs. For those households for whom a public housing unit is not available for permanent relocation, the household may be offered a Housing Choice Voucher or an affordable unit in another housing complex. As a last resort, a household may be offered a unit in the private sector with a Replacement Housing Payment.

- ***Transfer to another public housing unit outside of Curtis Apartments within the WHA portfolio.*** See above for more detail.
- ***Housing Choice Voucher Program (HCVP).*** See above for more detail.

- ***Private Sector housing with a Replacement Housing Payment (RHP).*** Although not anticipated, a family for whom there is not an available public housing unit at a WHA development and who is found ineligible for a HCVP tenant-based voucher may be eligible for an RHP to rent a private market unit.

This payment is intended to cover a reasonable increase in the resident's monthly rent and utility costs over what they would pay if they had not been required to relocate from Curtis Apartments Phase for a period of up to 60 months (if HOME or CDBG funds used). WHA can administer this RHP in installments or make a lump sum payment (if the RHP is under \$500). A resident who receives an RHP may opt to use it as down payment assistance for a home purchase. The amount of RHP for down payment assistance is limited to \$7,200.

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

- ***Purchasing a home.*** If a displaced household purchases a replacement dwelling, they will be entitled to down payment assistance, including incidental expenses, up to \$7,200. The down payment assistance is calculated according to the same formula used for the RHP; however, if the calculation is less than \$7,200, WHA may, at its discretion, increase the payment. The full amount of down payment assistance will be available to the household on the date of their closing and only upon receipt by WHA of purchase and sale documents.

No legal occupant to be displaced shall be required to move from a dwelling unit unless at least one comparable replacement dwelling has been made available to the person's household in accordance with applicable state regulations and federal regulations according to the procedures set out in 49 CFR 24.204, as amended. Any replacement housing payments to eligible displaced tenants would be subject to 760 CMR 27.06(3).

V. RESIDENT CHARACTERISTICS

HOU Relocation staff have begun conducting relocation assessments with approximately 60% of Phase 1 households (See ***Appendix B, Curtis Apartments Resident Relocation Needs Survey***). Among the important information being collected here includes bedroom size needs, relocation choice, and reasonable accommodation needs. The complete compilation of this information will help facilitate a smooth resident relocation.

VI. MOVING ASSISTANCE

The following details the moving assistance and covered relocation expenses that will be provided, at no cost, to all Curtis Apartments residents being temporarily relocated:

- Packing supplies (boxes, tape, and wrapping paper)—will be provided at no cost to the resident for their temporary move to on-site or off-site relocation unit.
- Services of a bonded moving company that will move all of their belongings.
- Packing and unpacking assistance for households requiring such assistance.
- Storage of belongings, as needed, during unit renovations.
- Assistance in transferring home cable and telephone services.
- Transportation to a temporary unit, if needed.
- Reimbursement for any reasonable out-of-pocket expenses incurred in connection with a temporary move.

In the event that any household opts to permanently relocate off-site, the household will receive assistance for necessary moving services and payment for actual moving and related expenses, as the WHA determines to be reasonable and necessary. Residents who permanently relocate to another public housing unit will be provided with the moving assistance outlined below:

A. HOU-Contracted Move (No Charge to the Resident)

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

- Packing and unpacking assistance if requested, by an “Elderly Person” so defined herein and/or required for reasons of reasonable accommodation of a disability in the household.
- New boxes, packing paper, bubble wrap and tape as well as packing instructions.
- Storage of personal property for a period not to exceed 12 months, unless WHA determines that a longer period is necessary. Any items that could pose a health or safety hazard (i.e., infested furniture) will not be stored.
- Inspection for and extermination of pests prior to relocation. No furniture or belongings will be moved or stored if they are determined to be infested.
- Disconnecting, dismantling, removing, reassembling and reinstalling relocated household appliances and other personal property, including personal computer set-up and beds, as long as they have been installed with the approval of Curtis Apartments management and are done so in compliance with the lease.
- Disposing of Affected Residents’ unwanted items (including appliances) upon resident request.

- Insurance for the replacement value of property in connection with the move.
- The replacement value of property lost, stolen or damaged in the moving process (that is not the result of the fault or negligence of the displaced person, his/her agent or employee), where insurance covering such loss, theft or damage is not reasonably available.

Residents who permanently relocate to a non-PHA unit may choose the HOU-Contracted Move (detailed above) or one of the other two moving assistance options listed below. However, in the event HOU Staff determines that a household has not taken good faith steps to meet reasonable moving deadlines, the HOU Staff may contract with a state-approved, licensed and insured moving company to provide the move as provided under the first option.

B. Fixed Payment for Moving Expenses

A household can receive a lump sum amount based on the schedule of allowance published by the Federal Highway Administration (FHWA). A separate \$100 Dislocation Allowance as well as reimbursement of utility reconnection fee/s will not be paid under this option, as the lump sum includes these reimbursements. No invoices/receipts are required because the payment amount is fixed based on the number of rooms of furniture in the current dwelling. However, the household will not receive the fixed payment until after the HOU Staff has completed an inspection of the public housing unit and verified that all belongings have been removed, that the unit is in broom-swept condition and the unit keys have been returned to the property management staff. A household may substantiate a hardship condition that would necessitate upfront payment of the lump sum allowance. Households choosing this option will be informed in advance of the amount for which they would be eligible. As of August 26, 2021, for the State of Massachusetts, the “Fixed Payment for Moving Expenses; Residential Moves” as published in the Federal Register was as follows:

1 BR/3 rooms = \$1100/\$1100	= 2 BR/4 rooms = \$1,250 \$1250	3 BR/5 rooms = \$1,400
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Reimbursement for Actual Reasonable Moving and Related Expenses

A household may be reimbursed for the actual cost of all reasonable moving and related expenses, not to exceed the costs of a commercial move. To be reimbursed, the resident must provide documentation of incurred reasonable moving and related expenses and submit a claim within 18 months from the date of their move. Reasonable moving and related expenses include:

- Dislocation costs, such as for meals during the move;
- Cost of commercial move or cost of labor and equipment to complete the move (supported by receipt bills);

- Transportation of household members and their personal property, which cannot be in excess of 50 miles (may include reimbursement for personally-owned vehicles which need to be moved). Mileage reimbursement shall be calculated based on the Internal Revenue Service (IRS) Standard Mileage Rate in effect at the time of travel.
- Packing boxes;
- Packing, creating, uncrating and unpacking of personal property, if needed;
- Storing of personal property for a period not to exceed 12 months, unless WHA determines that a longer period is necessary. Any items that could pose a health or safety hazard (i.e., infested furniture) will not be stored;
- Disconnecting, dismantling, removing, reassembling and reinstalling relocated household appliances and other personal property, including computer set-up, as long as they have been installed with the approval of WHA management and are done so in compliance with the lease;
- Reinstallation of telephone, cable and Internet service;
- Insurance coverage for the replacement value of the property in connection with the move and necessary storage;
- The replacement value of property lost, stolen or damaged in the process of moving (not through the fault or negligence of the displaced person) where insurance covering such loss, theft or damage is not reasonably available; and
- Other reasonable moving-related expenses, such as sensitive medical/adaptive equipment, furnishings and personal belongings of a live-in aide, a piano, or a greater than usual amount of items stored in the household.

HOU Staff will complete an inspection of the public housing unit and verify that all belongings have been removed, that the unit is left in broom-swept condition and the unit keys are returned to the property management staff.

WHA will pay moving expenses for Curtis Apartment Phase 1 residents who return to the redeveloped units. Residents will be provided with the services of a licensed and insured moving company (including packing and unpacking, as needed), receive packing supplies and be reimbursed for any utility reconnection fees.

VII. RESIDENT NOTIFICATIONS

Throughout the relocation and redevelopment, the HOU Staff and the Development Team will maintain communication with Affected Residents to keep them informed of progress and to answer questions about the implementation of the Plan, including through periodic virtual or in-person meetings, notices, newsletters, flyers, website, door-to-door communication, and other in-person or alternative means of communications meeting COVID-19 safety protocols. HOU Staff will communicate with residents via text and/or email if that is their preferred method of communication. Residents will be informed in writing, or via another appropriate and accessible mode of communication, of their right to a

reasonable accommodation to enable them to fully participate in all Project activities.

All Project-related written communications will be translated into Spanish. Meetings will be conducted in English, Spanish and other languages, as requested. If an Affected Resident has a first language other than English or Spanish, this will be noted by the HOU Staff during the Assessment and accommodations will be made on a case-by-case basis to ensure that all Affected Residents receive correct, equal and timely communications. Over the course of the Project, it is likely that other language needs may emerge and will be addressed as detailed above.

All Affected Residents will be provided with regulatory relocation notices written in plain language, directed to the head of each household, that includes the name and telephone number of the person who may be contacted for further information so that tenants who are unable to read and understand the notices will be provided with appropriate translation, communication and counseling. The regulatory relocation notices will be in English, with translation into Spanish (and other languages, as needed in accordance with WHA policies) and provided by certified mail, return receipt requested. HOU will undertake personal delivery in-hand, of any notices sent by certified return receipt that are not picked up by the resident, with all documentation of delivery as required under the Governing Laws.

The following relocation notices will be provided to residents:

1. **Resident Information Notice.** Prior to submitting a RAD application, the PHA must notify residents in writing (and post letters in at least 3 public areas) of planned conversions. The RIN ensures residents understand their rights, and provides basic information to facilitate resident engagement with the PHA, including whether relocation is anticipated. The RIN was provided to each Curtis Apartments household on August 18, 2022.
2. **General Information Notice (GIN).** The purpose of the GIN is to inform residents about the plans for redevelopment and about their potential eligibility for receiving relocation assistance under the URA and Section 104(d). The GIN was provided to each Curtis Apartments household on August 18, 2022.
3. **Notice of Nondisplacement**-written notice informing tenants that they will not be permanently displaced but they will have to move temporarily in order to facilitate the redevelopment. The Notice of Nondisplacement also ensures the residents will be able to return to a redeveloped unit on the property.
4. **90-Day Notice**—written notice (under Section 18 Demo/Dispo) informing tenants that project will be funded, their apartment will be affected and that they will need to relocate to comparable housing. they are entitled to comparable replacement dwelling and of the moving assistance available to them.

5. **30-Day Notice.** This notice will contain the address of the relocation unit to which the resident is relocating to as well as the date of their move, and will be given 30-days before the resident's move date. The HOU Staff will work with the household to identify this unit.
6. **Notice of Eligibility/120-Day Notice.** Because residents will be temporarily relocated for more than one year, just prior to that one-year mark they will have the option to choose whether they want to remain temporarily relocated and returning to a unit in the redeveloped Curtis Apartments Phase 1 or opt to be permanently relocated and receive permanent relocation assistance and benefits under the URA. Residents who choose the latter will receive a Notice of Eligibility/120-Day Notice.

The following are list of additional notices that would be sent out in the event of RAD funding:

1. **Notice of Intent to Acquire.** This RAD notice must be provided to residents no earlier than 90 days prior to a reasonable estimate of when WHA will be submitting their financing plan.
2. **RAD RCC and Public Housing Lease Replacement Notice.** This notice informs residents that HUD has approved the property for RAD conversion and has issued a Rental Conversion Commitment (RCC). The notice further informs residents that they have a right to remain in an appropriately-sized unit at the covered project, they will not be subject to any rescreening or eligibility determinations due to the RAD conversion, that their public housing lease will be replaced with a new Project-Based Voucher Section 8 lease, and that they will not experience rent increases because of RAD (they will pay 30% of their income).
3. **Notice of Return to Covered Project.** This notice will be provided to all residents 90 days prior to their anticipated return date.

VIII. RELOCATION SERVICES AND PROCEDURES

A. Relocation Administration

Trinity has contracted with Housing Opportunities Unlimited (HOU), to provide comprehensive relocation services to the residents of Curtis Apartments who must move due to redevelopment of the property. Under the direction of Yasaira Garcia, HOU's Project Director, HOU's on-site staff who will be responsible for administering this Plan will include a Relocation Coordinator, 1 Relocation Assistant. The HOU team will work collaboratively with the Development Team (including WHA and Trinity Financial, LLC) and staff from other agencies to provide comprehensive relocation and rehousing services pursuant to this Plan.

HOU will maintain an office onsite at 32/34 Great Brook Valley Avenue, Worcester, MA, convenient for the Affected Residents. For residents with accessibility needs, HOU will meet with residents in their homes or at a wheelchair accessible location.

HOU Staff will be scheduled to work between 9am and 5pm as well as some evenings to ensure they are accessible to Curtis Apartments residents during the day and evening. HOU Staff will periodically work on Saturdays to provide residents with additional access. Residents will also have the opportunity to meet individually with the Curtis Apartments property manager (a staff of Worcester Housing Authority) and HOU's Relocation Coordinator at their request throughout the Project.

HOU Staff are responsible for conducting resident meetings, providing the required Resident Notices (described above), conducting mobility counseling, providing referrals to supportive services and technical assistance, scheduling and coordinating relocation moves, identifying Comparable Replacement Dwellings for relocation and providing housing referrals, administering relocation benefits, coordinating utility hook-ups, conducting follow-up visits, communicating on an ongoing basis with Affected Residents, as needed, and documenting the relocation activities.

B. Resident Relocation Needs Survey

The Relocation Staff will conduct individual Resident Relocation Needs Survey sessions with all Affected Resident households to assess their current housing needs, as well as to learn of their concerns and potential barriers to relocation. For households whose first language is not English, the assessment will be conducted by a bilingual Relocation staff person or with a professional interpreter services company.

During the meeting, the Relocation Staff will administer the Needs Survey to update each Curtis Apartments household's composition and to document other information that may be relevant in identifying a suitable relocation unit for each household; to ensure each household receives all of the relocation services, benefits and payments to which they are entitled; and to minimize the adverse impacts of relocation. Survey topics include:

1. An assessment of the numbers of families to be permanently relocated, including such information as family size and bedroom size needs, and special consideration of the impact of relocation on elders, families with children, large families and people with disabilities.
2. Special family needs in identifying their comparable relocation unit (e.g., large bedroom size, presence of ineligible household members, need for accessibility features or other reasonable accommodations, pets, proximity to jobs, schools, services or family supports).

3. Identification of any planned vacations or hospitalizations during the timeframe for relocation.
4. Whether help is needed to make preparations for relocation (packing assistance, utility transfers, social service provider referrals and/or notifications, postal and address updates).
5. Pest infestation and/or hoarding resolution assistance, these issues will be addressed during the relocation process.
6. The names, addresses and telephone numbers of other family members, friends or advocates that may be contacted by the Relocation Coordinator to assist in making preparations for relocating the family.
7. Other issues of importance to the household.

See ***Appendix B Curtis Apartments Resident Relocation Needs Survey.***

All Affected Residents must be in compliance with all terms of their lease during the relocation process, including being current with his or her rent, or adhering to the terms of a repayment agreement during the relocation process. The following relocation process will be applicable to Affected Residents:

- A. All Affected Residents will receive a Resident Information Notice and General Information Notice.
- B. A copy of this relocation plan will be available to all Affected Residents upon its completion. Each Affected Resident will be able to view and obtain a copy of this plan, as requested, through the relocation office and onsite WHA Management office.
- C. Each Affected Resident will receive a 90-Day Notice (under Section 18 regulations) which will notify them of the date by which they must vacate their apartment.
- D. Relocation Staff will conduct workshops to explain relocation procedures in detail. This includes providing written information on moving assistance, benefits, rights, privileges and protections.
- E. All heads of household will be interviewed personally by staff of Relocation Contractor HOU to determine housing and special needs.
- F. Each Affected Resident will be offered a comparable replacement dwelling based on the appropriate bedroom size needed, special physical needs and availability.

- G. The Relocation Coordinator will schedule a moving date with the resident and either schedule the move with the mover or confirm with the resident his or her selection of a self-move.
- H. Residents will receive a 30-Day Notice informing them of their temporary relocation unit and their move date.
- I. Upon request, all residents will be offered transportation to inspect the housing to which they are referred.

IX. RELOCATION BUDGET

WHA has budgeted for the Curtis Apartments relocation effort (See *Appendix G*).

X. GRIEVANCE AND APPEALS PROCEDURES

A. Failure of Residents to Adhere to This Plan

WHA will exercise its authority judiciously with respect to its rights to relocate Affected Residents in order to ensure and enable the redevelopment activities to occur in a timely fashion. Eviction should be employed only as a last resort and shall be undertaken in conformance with applicable state and local law and carried out in the manner described in 49 CFR 24.206 (as amended and as it may be amended). An eviction related to non-compliance with a requirement related to carrying out a project (e.g. failure to move or relocate when instructed, or to cooperate in the relocation process) shall not negate a person's entitlement to relocation payments and other assistance set forth in 49 CFR Part 24. Nonetheless, in accordance with 760 CMR 27.04 (4)(o) and 49 CFR 24, property management may initiate actions under the eviction procedures if a resident refuses to comply with the following:

1. Move or relocate;
2. Meet with WHA Management/HOU Relocation staff regarding relocation; or
3. Cooperate in the relocation process.

WHA and HOU Relocation Staff will undertake every effort to best accommodate resident needs during their relocation and coordinate resident relocation with the support of resident emergency contacts/family members so as to avoid eviction. This includes employing informal conferences with the Development Team in an attempt to address any issues. As such, any adverse determination of ineligibility or change in eligibility status of an Affected Resident shall be reported in writing to the Development Team within ten (10) calendar days of such determination or change in eligibility.

B. Grounds for Appeal

If a resident contends that this Relocation Plan is not being implemented properly or believes the WHA has failed to properly consider the person's request for relocation assistance, the resident may file a written appeal to WHA (630 Plantation Street, Worcester, MA 01605), where staff is responsible for ensuring that the Relocation Advisory Agent:

- Properly determines whether the resident qualifies or will qualify as a person who is eligible for relocation assistance;
- Properly determines the amount of any relocation payment required by this plan;
- Properly provides an appropriate temporary relocation unit; and
- Properly responds to an appeal in a timely manner.

The WHA/HOU Relocation Staff shall inform residents, in writing, of their right to appeal to WHA.

Grounds for an appeal may include:

- A determination by the WHA of the individual's eligibility or ineligibility as an Affected Resident, as defined by the Relocation Plan;
- A determination by the WHA of the scope and amount of relocation assistance made available to an Affected Resident, including advisory services, moving expenses, and replacement housing payments.
- Any decision to permanently relocate the family, including the terms and conditions of the permanent move, or the amount and scope of permanent relocation benefits.
- WHA's determination that an Affected Resident rejected an offer of a Comparable Replacement Dwelling without good cause.

Grounds for appeal shall not include suspension of discretionary relocation benefits to Former Residents.

C. Filing an Appeal

An appeal must be filed in writing with the Administrator of the WHA within sixty (60) calendar days of the date of the contested action, or by referral from WHA or Relocation Staff, in which event written notice from the resident is not required. The date of the contested action is the date on which a determination was received by the resident. If the appeal is based on an event for which a date of action cannot be determined, the appeal must be filed within sixty (60) calendar days of the action.

- **Right to Representation; Right to File Review.** Any resident requesting an appeal shall have the opportunity to examine and to copy all documents, records and regulations that are relevant to the appeal prior to any hearing. The WHA may charge a reasonable fee for copies of more than fifty (50) pages. Any resident requesting an appeal shall have the right to be represented by counsel or any other person of their choice.
- **Conduct of the Appeal.** An appeal shall be scheduled as promptly as possible. All requests for appeals shall be heard within ten calendar days from the time of the request for the appeal. The appellant shall have at least five calendar days' advance written notice of the date, time and place of the hearing. If the appellant requires a change in the date of the hearing, the resident must contact the WHA at least forty-eight (48) hours in advance of the scheduled hearing. Upon the resident's showing of good cause, WHA shall arrange an alternate date and time for the hearing and notify all parties.

The appeal will be conducted by a representative of WHA who is not the person who took the action under appeal. The hearing shall be informal, and oral or documentary evidence pertinent to the facts and issues raised by the appeal may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings. At the appeal, the appellant shall have the right to:

- examine and to copy all documents, records and regulations that are relevant to the appeal prior to any hearing;
 - be represented by counsel or any other person of their choice;
 - present evidence and arguments in support of the appeal, to controvert evidence relied on by the WHA, and to confront and cross-examine all witnesses on whose testimony or information the WHA relies; and
 - a decision based solely and exclusively upon the facts presented at the hearing.
- **Decision by the WHA.** Within five (5) calendar days after the hearing, the hearing officer shall prepare a written decision, which shall include a statement of its findings of fact and specific reasons for the results. A copy of the decision shall be mailed or delivered to the parties or their representatives and a copy shall be kept in the resident's file.
 - **Appeal to Bureau of Relocation.** Within 30 days of receipt of the decision by the WHA, a displaced person as defined in M.G.L. c. 79A §1 who is dissatisfied with the displacing agency's determination on the amount of a relocation payment or resident's eligibility for a relocation payment or resident's eligibility for a relocation payment may submit a written request for further review to the Bureau of Relocation at:

Maggie Schmitt, Urban Renewal & Relocation Coordinator

Bureau of Relocation
Department of Housing and Community Development
Commonwealth of Massachusetts
100 Cambridge Street, Suite 300
Boston, MA 02114
(617) 573-1408 (ph)

If a review by the Bureau is not sought within 30 days of receipt of a decision, the decision of the WHA shall be final.

XI. RELOCATION RECORDKEEPING AND NOTICES

As part of its recordkeeping requirements, an occupant list will be maintained that when the project is completed will identify:

- A. All persons occupying the site as of the date of Initiation of Negotiation (ION)
- B. All persons moving onto the property on or after the ION date
- C. Addresses of individuals and families who have moved from the site since the ION date

All personal data of displacees (e.g. occupant lists, tenant surveys) must be kept confidential by all holders of the data according to the provisions of M.G.L. c. 66A and other requirements.

The following notices will be delivered by certified mail, return receipt requested or hand-delivered with proof of receipt:

- A. Resident Information Notice (RIN)
- B. General Information Notice (GIN)
- C. Notice of Nondisplacement
- D. 90-Day Notice
- E. 30-Day Notice
- F. Notice of Eligibility for Relocation Assistance/120-Day Notice (only for residents who opt for permanent relocation assistance and benefits)
- G. Notice of Return to the Covered Project

The following additional notices would be sent out in the event of RAD funding:

- A. Notice of Intent to Acquire
- B. RAD RCC and Public Housing Lease Replacement Notice

HOU will maintain the following records in each resident file for this relocation project:

1. Notice of Intent to Acquire (if applicable)
2. Resident Information Notice (RIN)

3. General Information Notice (GIN)
4. Notice of Nondisplacement
5. RAD RCC and Public Housing Lease Replacement Notice (if applicable)
6. Notice of Eligibility for Relocation Assistance/120-Day Notice (only for residents who opt for permanent relocation assistance and benefits)
7. 60-Day Notice (for residents who are temporarily relocating)
8. Relocation Survey
9. 30 Day-Notice
10. Notice of Return to the Covered Project

The aforementioned relocation notices and records, as well as any other relocation notices and records, will be maintained, in accordance with 760 CMR 27.04(4) (i), for at least three years after each displaced person receives final relocation payment.

Appendix B: Curtis Apartments Resident Relocation Needs Assessment



Resident Relocation Needs Assessment Curtis Apartments

The purpose of the relocation survey is to gather updated information on your household's relocation needs and preferences. It will not be used for any other purpose. This is not a notice to move or an assignment of where you will be moving.

Head of household name: _____

Address (including unit #): _____

Home Phone: _____ **Cell:** _____ **Work:**

E-mail: _____

Best Time or Date to be reached: _____ **May we call you at work?** Y
/ N

Optional: Alternate/Emergency Contact HOU may contact if we are unable to reach you:

Name: _____ **Phone:** _____ **Relationship:**

Please list all occupants on your lease:

Name	Relationship	Date of Birth	Age	Gender
	Head of Household			

Total # in household: _____ Current size unit: _____

Office Only: Eligible unit size (public housing): _____ Eligible unit size (Section 8): _____

1. Do you anticipate any changes to your household composition over the next 12 Months?

- Yes
- No

If Yes: Will you be adding or removing a household member?

2. What is the primary language spoken in your household?

- English
- Spanish
- Other (list) _____
- Interpretation Required: [] Yes [] No

3. Does the head of household require any translations?

- Yes, language(s): _____
- No

4. Does the head of household have difficulty reading in their primary language?

- Yes
- No

5. Are you or any household member(s) disabled?

- Yes. If so, please provide the names of the household member(s): _____
- No

6. Do you require a unit which will need special features to accommodate the disability of any household member (i.e., unable to climb stairs, needs assistance rails [grab bars] in bathroom, requires wheelchair accessibility, needs special equipment for vision and/or hearing impairment(s), has a live-in aide, etc). Is there a reasonable accommodation on file with WHA? (Y/N)

If yes, please describe special unit needs:

- No modifications to the unit
- Wheelchair-Accessible Unit
- A Sensory-Impaired-Accessible Unit
- First floor or elevator building
- Grab bar
- Personal care attendant
- Additional bedroom
- Other Physical Adaptations or Accommodations (please explain)

7. Do you or any household members currently have outside service providers that come into your home (i.e. elder services, homemaking services, personal care services, Meals on Wheels, etc)?

- No
- Yes

If yes, please provide agency name/s and contact information:

9. Where do the children in your home go to school/day care/after school?

Name of Child	Grade	Name of School/Program and address	Mode of transportation? (walk, school bus, car, bicycle, public transit bus or train, carpool)	After School Program

10. Do you or any member of your family travel regularly to a job, college or supportive service program such as counseling, child care, job training, etc.?

- No
- Yes, please list below

Household member	Organization/Employer Name/College	Location/Address	Mode of Transportation

11. Please indicate in numbered order your preference for relocation housing. Please note that all options are subject to availability:

- ___ Remain on site in original Curtis Apartments development (limited space)
- ___ Move to other WHA property

12. What is your means of transportation (check all that apply)?

- Automobile, note how many in the household: _____
- Public Transportation (bus, train, etc)
- Walk/Bicycle
- Other

13. Do you or any adult household members have any extended travel plans, hospitalizations or plans to be absent from your unit within the next 12 months?

- No
- Yes (please provide a brief explanation and dates)

14. Do you have any specialized equipment or materials that must be moved to your permanent unit? (If yes, list below)

15. Do you have any pet(s)? *Include fish, birds, gerbils, rabbits, cats, dogs*

- No
- Yes What kind of pet(s) and how many of each?

If so, is the pet registered with the management office? _____
(*HOU to refer resident to WHA pet policy*)

16. Do you have a LifeLine/ Life Alert?

- No
- Yes

17. Do you own a washer or dryer or any other appliances in your unit?

- No
- Yes: please identify the type of appliance:_____

18. Are you interested in returning after the redevelopment of Curtis Apartments?

- Yes
- No

19. Are you a participant in WHA's A Better Life (ABL) Program?

- No
- Yes: if so, who is your Family Life Coach?_____

20. When was your last recertification with management (month, year)

INTERNAL NOTES/UNIT OBSERVATIONS

- Hoarding
- Cluttered
- Housekeeping Issues

Provide more information:

Please note the following:

- This information will be kept confidential and not shared with anyone unless you provide written consent.
- This information will be shredded when no longer needed.
- You are entitled to a copy of this completed form.

Interview date: _____	Time: _____
Interviewer's Name: _____	
Interpreter/Translator's Name: _____	
Head of Household Signature: _____	
Co-Head of Household Signature: <i>(if any)</i> _____	

Notes and Observations:

Appendix C: Relocation Notices

[PHA LETTERHEAD]

RESIDENT INFORMATION NOTICE (RIN)

[Date]

Dear [Resident Name]:

You are invited to a resident meeting to talk about [Insert PHA's name or acronym] plans to convert [insert Project Name] from the public housing program to Section 8 rental assistance under the Rental Assistance Demonstration (RAD). The meeting information is:

[Insert time and place of at least the first resident meeting – perhaps any scheduled meetings]

RAD is a voluntary program run by the U.S. Department of Housing and Urban Development (HUD). Under RAD, HUD will change the way it provides rental assistance to the property from public housing to a long-term Section 8 assistance contract. The Section 8 program would make it easier for us to access money to repair and improve the property, either now or in the future.

This letter describes your rights under RAD and explains how a RAD conversion might affect you.

Whether we participate in RAD or not,
you will still get rental assistance.

Your Right to Information

At the meeting, we will describe the RAD program and our current ideas in more detail. If we submit an application to HUD and are accepted into the program, we will have at least one additional meeting with you about our plans. You have the right to hear about major changes in the plans for the project, and we will invite you to additional meetings if key features of the plans change. You also have a right to organize and to form a resident organization to serve as your voice and to help you become well informed about the RAD plans.

Your Right to Rental Assistance

Our decision to participate in RAD does not affect your rental assistance eligibility. You are not subject to new eligibility screening. If we satisfy all HUD requirements and the property is placed under a Section 8 Housing Assistance Payment (HAP) contract, you have a right to ongoing rental assistance as long as you comply with the requirements of your lease. In most cases, your rent will not change with the conversion from public housing to Section 8. In the rare event that your rent

calculation would change (most commonly, when you are paying a “ceiling rent”), the increase would be phased in over time.

Your Right to Return

You have a right to return to an assisted unit once any construction work is done. However, we may need to move you during construction and your post construction home may be a different unit than your current home. If the plans involve the transfer of the rental assistance to a different site, you may need to move to the new site to keep your rental assistance (provided that it is within a reasonable distance of your current home), but you still have a right to an assisted unit.

You get to return to a RAD Section 8 unit unless you choose to move somewhere else. If you believe the plans prevent you from exercising your right to return, you have the right to object to the plans. RAD program rules require us to make sure that anyone who wants to return can do so.

Your Right to Relocation Assistance

In some situations, we may need to relocate you from your unit temporarily in order to complete repairs or do construction. Since we are at the beginning of the planning process for the RAD conversion, we don't yet know whether you will need to move. You do not need to move now.

If we require you to move, you are entitled to certain relocation protections under the RAD rules, including, in all cases, advance written notice and detailed information about the move. The other specific relocation protections depend on the situation, but may include advisory services, moving assistance, payments and other assistance.

Don't Put Your Rights at Risk!

You are always welcome to move based on your household's needs and personal goals. However, if the RAD effort will require relocation and you choose to move from the property on your own without waiting for instructions from us, you may lose your eligibility for relocation payments and assistance. If you want to preserve your relocation rights, please wait until you get a Notice of Relocation and instructions to move from us!

The RAD conversion, and any relocation associated with it, must be implemented consistent with fair housing and civil rights requirements. If you need a reasonable accommodation due to a disability, or have other questions about the RAD conversion, please contact [insert contact name and manner of contact], who will assist you. If you need to appeal a decision made by us, or if you think your rights aren't being protected, you may contact [insert contact name and information for local PIH Field Office].

Because we are very early in the process, the plans for the RAD conversion are likely to change. We are holding resident meetings to share our current ideas and will keep you informed about major changes to these ideas as we develop our

plans. You should also share with us any information you have on repairs that need to be made, since you know the property best. We will give that information to the people who are helping us figure out what work needs to be done at the property.

We hope this letter gives you useful information about your rights. We are also including with this letter a list of frequently asked questions and answers that may help you understand the RAD program better. We encourage you to come to the resident meetings to learn more about how the RAD conversion would impact your property and you.

Sincerely,

WHA LETTERHEAD

GENERAL INFORMATION NOTICE (GIN)

Date: _____

Dear _____ :

The property you currently occupy is being proposed for participation in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. At this time, we expect that the proposed redevelopment will require you to be relocated temporarily from your unit. We will provide further details to you as plans develop.

This notice does not mean that you need to leave the property at this time. This is not a notice of eligibility for relocation assistance. The remainder of this letter only applies to situations where you will need to be relocated from your unit.

This notice serves to inform you of your potential rights under the RAD program and a federal law known as the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). If the proposed RAD project receives HUD approval and if you are displaced permanently as a result, you may become eligible for relocation assistance and payments under the URA, including:

- 1) Relocation advisory services that include referrals to replacement properties, help in filing payment claims and other necessary assistance to help you successfully relocate;
- 2) At least 90 days' advance written notice of the date you will be required to move;
- 3) Payment for moving expenses; and
- 4) Payments to enable you to rent a similar replacement home.

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 immigrant lawfully present in the United States.

As a resident of a property participating in RAD, you have the right to return to the project after the project is complete. You will be able to lease and occupy a unit in the converted project when rehabilitation is complete.

If you are permanently displaced from your home, you will not be required to move until you are given at least 120-day advance written notice of any required move and at least one comparable replacement dwelling has been made available to you. If you are temporarily relocated and your temporary relocation lasts more than one year, you will be contacted and offered permanent relocation assistance as a displaced person under the URA. This assistance would be in addition to any assistance you may receive in connection with temporary relocation and will not be reduced by the amount of any temporary relocation assistance you have already received.

If you are required to relocate from the property in the future, you will be informed in writing. WHA will inform you of what assistance and payments you are eligible for if you will be relocated because of RAD and how you will receive these payments. If you become a displaced person, you will be provided reasonable assistance necessary to complete and file any required claim to receive a relocation payment. If you feel that your eligibility for assistance is not properly considered, you will also have the right to appeal a determination on your eligibility for relocation assistance.

You should continue to pay your rent and meet any other requirements specified in your lease. If you fail to do so, WHA may have cause for your eviction. If you choose to move, or if you are evicted, prior to receiving a formal notice of relocation eligibility, you may become ineligible to receive relocation assistance. It is very important for you to contact us before making any moving plans.

In addition, please note the following: additions to family composition are limited to marriage, adoption, changes of custody, or birth and are subject to the current WHA process during this transition.

You will be contacted soon so that we can provide you with more information about the proposed project. If the project is approved, we will make every effort to accommodate your needs. In the meantime, if you have any questions about our plans, please contact: Yasaira Garcia, Project Manager, 508 612-0824 or at ygarcia@housingopportunities.com.

This letter is important to you and should be retained.

Sincerely,

Alex Corrales
Chief Executive Officer

WHA Letterhead

**GUIDEFORM NOTICE OF NONDISPLACEMENT
TO RESIDENTIAL TENANT**

(date)

Dear _____:

On __ (date) __, the __ (City, County, State, Public Housing Authority (PHA), other), notified you of proposed plans to rehabilitate the property you currently occupy at (address)_____ for a project which could receive funding assistance from the U.S. Department of Housing and Urban Development (HUD) under the _____ program. On __ (date) __, the project was approved and will receive federal funding. Repairs will begin soon.

This is a notice of nondisplacement. You will not be required to move permanently as result of the rehabilitation.

This notice guarantees you the following:

1. Upon completion of the rehabilitation, you will be able to lease and occupy your present apartment or another suitable, decent, safe and sanitary apartment in the same building/complex under reasonable terms and conditions. *
2. If you must move temporarily so that the rehabilitation can be completed, you will be reimbursed for all of your extra expenses, including the cost of moving to and from temporary housing and any increased interim housing costs. The temporary unit will be decent, safe and sanitary, and all other conditions of the temporary move will be reasonable.

Since you will have the opportunity to occupy a newly rehabilitated apartment, I urge you not to move. (If you do elect to move for your own reasons, you will not receive any relocation assistance.) We will make every effort to accommodate your needs. Because federal funding is involved in this project, you are protected by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Of course, you must continue to comply with the terms and conditions of your lease.

If you have any questions, please contact _____ (name) ,
at _____.

Sincerely,

Alex Corrales
Chief Executive Officer

WHA Letterhead

90-Day Notice to Vacate

Date:_____

Dear:_____

On _____(*insert date*), the Worcester Housing Authority (WHA) received approval from the Department of Housing and Urban Development's (HUD) Special Application Center (SAC) to move forward with the Redevelopment of Phase I of Curtis Apartments. The unit which you occupy at _____(*insert address*) will be affected by this redevelopment. WHA has determined that it will be necessary for you to relocate to a new location.

Your family has specific rights and protections under HUD regulations, including a minimum of 90 days' notice prior to the date you will be required to be moved out of your apartment. This letter provides your 90 days' notice and describes rights and protections.

You will be provided housing comparable to the unit you currently occupy. Families residing in Curtis Apartments will be offered comparable housing in another WHA public housing development.

WHA will provide moving services and will pay all actual and reasonable moving expenses, including the transfer of utilities. Persons with disabilities are entitled to comparable housing that accommodates disability needs.

You are entitled to housing offered on a nondiscriminatory basis, in accord with federal and state laws, which prohibit discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability.

WHA has contracted with Housing Opportunities Unlimited (HOU), which specializes in helping families during the relocation process. HOU will contact you in order to discuss your housing needs and preferences, and to explain your rights and protections in more detail.

Please contact HOU Relocation Coordinator, _____, if you have any questions regarding this notice or the relocation process.

Sincerely,

Alex Corrales
Chief Executive Officer

60-Day Notice to Vacate

Date:

Dear Curtis Apartments Resident,

As a resident of _____ (*insert address*), the Worcester Housing Authority informed you of the upcoming redevelopment activities that are scheduled to take place. You were also notified that it might be necessary for you to temporarily relocate in order to carry out this project.

Because the timeframe of your temporary relocation will exceed one year, we are providing you with 60-days notice of your temporary relocation.

This serves as your 60-day notice to temporarily vacate your apartment, however your move may and can occur after this date. The effective date of this notice is _____ (*insert date 60 days from date notice distributed*).

This is a temporary move. You will have the option to move earlier if your temporary relocation unit is ready prior to the aforementioned move date. We will contact you at least two weeks before to confirm your move date, notify you about your temporary address, and make the necessary moving arrangements, which may include the assistance of a moving company. We will also supply you with packaging materials. If you have any questions, please contact your relocation coordinator at _____ (*insert contact info*).

I thank you in advance for your cooperation and support.

Sincerely,

(name)

HOU Relocation Coordinator

CURTIS APARTMENTS

30-Day Notice

Date:
Resident Name:
Address:

Dear Resident,

This letter serves as your 30-Day Relocation Notice.

On _____ you were issued a 90-Day-Notice by the Worcester Housing Authority. In that notice, the Worcester Housing Authority informed you it would be necessary for you to relocate out of your existing housing into a new housing no sooner than the date identified in the notice and that you would receive your unit assignment for a new unit at least 30 days in advance of the date by which you must vacate.

This is your 30-day notice to vacate the unit you currently occupy. _____ is the earliest date by which you must move.

This is to inform you that your new unit address is _____. HOU will contact you to make the necessary moving arrangements, including the assistance of a moving company.

You received information about the relocation benefits available to you under the Uniform Relocation Act and Real Property Acquisition Policies Act of 1970, as amended (URA) and Section 18 of the Housing Act of 1937. You are also covered under the Massachusetts State Law as overseen by the Department of Housing and Community Development. You may also refer to the Curtis Apartments Relocation Plan. Copies can be found at _____.

If you have any questions, please contact **HOU Coordinator at 617 -906-6082** by email at euceda@housingopportunities.com, or in his office at _____

Sincerely,
HOU Relocation Coordinator

**GUIDEFORM NOTICE OF ELIGIBILITY FOR URA RELOCATION ASSISTANCE
RESIDENTIAL TENANT
Grantee or Agency Letterhead**

(date)

Dear _____:

On __ (date) __, the Worcester Housing Authority notified you of proposed plans to redevelop the property you currently occupy at (address)_____ for a project which could receive funding assistance from the U.S. Department of Housing and Urban Development (HUD) under the _____ program. ____ (date)____, the project was approved and received federal funding.

You were temporarily relocated on _____ (date) to _____ (address). As you have been temporarily relocated for more than one year and you have opted to take permanent relocation assistance and payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), we are providing you with a Notice of Eligibility for Relocation Assistance.

Enclosed is a brochure entitled, "Relocation Assistance to Tenants Displaced From Their Homes." Please read the brochure carefully. It explains your rights and provides additional information on eligibility for relocation payments and what you must do in order to receive these payments.

The relocation assistance to which you are entitled includes:

Relocation Advisory Services. Including counseling and other assistance to help you find another home and prepare to move.

Payment for Moving Expenses. You may choose: (1) a payment for your actual reasonable moving and related expenses, or (2) a fixed moving payment in the amount of \$_____ based on the URA Fixed Residential Moving Cost Schedule, or (3) a combination of both.

Replacement Housing Payment. 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 dwelling, (2) the monthly rent and cost of utility services for your present home, and (3) for low-income persons, 30 percent of your average monthly gross household income. This payment is calculated on the difference in the old and new housing costs for a one-month period and multiplied by 42. Listed below are three comparable replacement dwellings 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 dwellings.

We believe that the dwelling located at (address) is the most representative of your present home. The monthly rent and the estimated average monthly cost of utilities for this dwelling is \$ _____ and it will be used to calculate your maximum replacement housing payment. Please contact us immediately if you

believe this dwelling is not comparable to your current home. We can explain our basis for selecting this dwelling as most representative of your current home 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 x \$_), if you rent the dwelling identified above as the most comparable to your current home or rent another dwelling 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 dwelling, your replacement housing payment will be based on the actual cost of the dwelling. We will not base your payment on any dwelling that is not a comparable replacement home. All replacement housing payments must be paid in installments. Your payment will be paid in #_ installments.

Should you choose to purchase (rather than rent) a decent, safe and sanitary replacement home, you would be eligible for a downpayment assistance payment which is equal to your maximum replacement housing payment, \$_____* . 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.

If you have any questions about this letter and your eligibility for relocation assistance and payments, please contact _____(name), _____(title), _____(phone), _____(address) before you make any plans.

Remember, do not move or commit to the purchase or lease of a replacement home before we have a chance to further discuss your eligibility for relocation assistance. This letter is important to you and should be retained.

Sincerely,

Alex Corrales, Chief Executive Officer

**Rental Assistance Demonstration (RAD) RCC and Public Housing Lease
Replacement Notice**

[Date]

Dear Resident,

As you know from previous notices and resident meetings, the property that you currently live in has been selected for participation in the Department of Housing and Urban Development's (HUD) RAD program. Per HUD resident noticing guidelines, we are informing you that HUD has approved your property for RAD conversion and has issued a Rental Conversion Commitment (RCC). This document has been signed by HUD, the property owner, and the [PHA Name] and outlines the terms of the RAD conversion. As a result, we are sending you this notice to inform you of the following:

- You have a right to remain in an appropriately-sized unit at the covered project.
- You will not be subject to any rescreening or eligibility determinations as a result of the RAD conversion.
- Your public housing lease will be replaced with a new Project-Based Voucher Section 8 lease. You will be required to execute new lease documents very soon and you will be contacted by property management with more details about when that will happen.
- Since Section 8 programs also set rents at 30% of income like in public housing, most residents will not have rent increases because of RAD. However, if you are paying a flat rent in public housing, you will most likely have to pay more in rent over time. In these cases, your new rent will be phased in over [three or five] years, meaning that you will pay a little more each year.

If you have any questions, please contact:

[Name, Title, Address, Phone, Email Address].

Please retain this notice for your records.

Sincerely,

[Name]

[Title]

RAD NOTICE AND NOTICE OF INTENT TO ACQUIRE

Date:

Dear Resident,

The property you currently occupy at Curtis Apartments is participating in the Department of Housing and Urban Development's (HUD) Rental Assistance Demonstration (RAD) program. On _____ (*insert date*) the Housing Authority and its developer partner, Trinity Financial, also known as _____ (*insert entity name*) notified you of proposed plans to rehabilitate the property you currently occupy at Curtis Apartments. On _____ (*insert date*), HUD issued the RAD Conversion Commitment and committed federal financial assistance to Phase 1 of the project. _____ (*insert entity name*) intends to acquire the property you currently occupy. This is a Notice of Intent to Acquire.

The rehabilitation of Curtis Apartments will be accomplished in multiple phases, as shown on the attached plan. Only the areas in Phase 1 are beginning construction now, starting _____ (*insert month and year*) and ending by _____ (*insert month and year*). Within 30-60 days from now, shortly after the closing date (anticipated to be _____ *insert date*), residents located in the portion of Phase 1 labeled will commence moving out of their units and will be temporarily relocated to a different unit at Curtis Apartments on or off of the property. Movers will be hired for moving residents' belongings and households will be provided with packing materials. Our relocation consultant, Housing Opportunities Unlimited (HOU), has been collecting information from residents regarding household needs that will inform them about the unit that residents will be placed in temporarily during the construction period. During the construction period, residents in Phase 1 will be housed in safe areas, with all construction activity on residential units to occur in a clearly fenced off area. All safety precautions will be enforced during the construction period.

In order for the Phase 1 project to be completed, residents currently living in Phase will need to be relocated for a period of approximately _____ (*insert # of months*). To assist you with understanding where your unit is located, we have attached a map showing the entire site, as well as a listing of all buildings and addresses in each area. Upon completion of the project, residents will be able to lease and occupy a unit that is decent, safe and sanitary in the completed project under reasonable terms and conditions. All residents who are required to temporarily move are eligible for relocation payments and assistance.

We expect that the Phase 2 portion of the project will undergo a similar rehabilitation at a later date but that date has not yet been determined.

As a current resident of Curtis Apartments you should not move or commit to the purchase or lease of a replacement home before discussing it with us, because you may become ineligible to receive relocation assistance.

Leases and Project Based Voucher Assistance

Please be advised that the public housing leases of those residents living in Phase 1 will be terminated at the effective date of the new HAP contract, and the new owner will require that new leases be signed in the next 30 days in preparation for closing. Phase

1 of the transfer of the complex will result in termination, replacement and/or renewal of restrictions for those residents living in Phase 1 only.

The PBV assistance will be administered through contracts between the Owner and the Holyoke Housing Authority, who now administers your ACC assistance. The PBV contracts would provide project-based assistance to the property. Households that choose to move one year or more after the PBV contract is put in place would receive a Housing Choice Voucher, or other comparable tenant-based assistance, if available, to use to seek housing elsewhere. Households will have the right to remain in their units whether or not the conversion to PBV occurs. No household will be displaced or made to permanently relocate as part of the conversion nor will they be subject to a rent increase as a result of the conversion.

The PBV contract will provide assistance to this property for a 20-year period, with renewal options.

Your household will not experience an increase in rent due to the proposed conversion of assistance to PBV assistance nor will residents be permanently displaced from their homes.

You may also feel free to contact us with questions at any time. For questions related to relocation matters, please contact _____ at _____ *-(insert contact info).*

If you have any other questions, please feel free to contact _____ Trinity Financial at _____ *(insert contact info).*

Remember, as a resident of Curtis Apartments:

- You do not need to move until further notification.
- Your rent will not be increased.

This letter is important to you and should be retained.

Sincerely,

NOTICE OF RIGHT TO RETURN TO PROPERTY

Curtis Apartments: Interest in Returning to Property

Date: _____

Resident Name: _____

Resident Return Address, Unit

#: _____

As a resident of Curtis Apartments recently relocated for the purpose of redevelopment

Initial all:

_____ I understand that I have the absolute right to return to live at Curtis Apartments in a ____-bedroom unit, which is assisted under Project Based Voucher contract with Worcester Housing Authority

_____ I understand that the cost for me to move back to Curtis Apartments will be paid for by the Project.

_____ I understand that if I choose not to move back to Curtis Apartments, I have made the decision not to move back of my own free will.

_____ I understand that if I choose not to move back to Curtis Apartments, I have voluntarily given up my right to return to the property.

Initial only one:

_____ Yes, I wish to return to Curtis Apartments.

_____ No, I do not wish to return to Curtis Apartments.

Head of Household:

_____ Print Name

_____ Signature

_____ Date



NOTIFICATION OF RETURN TO THE COVERED PROJECT
NOTIFICATION OF RETURN TO THE COVERED PROJECT

Date

Dear Resident,

Curtis Apartments, Worcester Housing Authority along with Housing Opportunities Unlimited are pleased to inform you that a rehabilitated unit at Curtis Apartment will be ready for you to occupy in approximately __ days. Your newly renovated unit address will be:

Street Address

City, State, Zip Code

Unit Number

As a resident returning to Curtis Apartments, all reasonable out-of-pocket expenses associated with the relocation to the property will be covered. During this time, you will be notified when packing supplies are available, the appropriate time to transfer any utilities/services and the date you will permanently move into your new residency. You will also be informed when and where you are able to retrieve your new keys as well as the nearest Post Office information for mail purposes.

Please note: If you decline to return to Curtis Apartments upon completion of the period of temporary relocation, it will be determined that you have voluntarily moved out of the property, without the benefit of further relocation assistance.

Curtis Apartments along with HOU appreciates your active participation and efforts during your temporary relocation experience. We ask that you start preparing for your transition back to Curtis Apartments soon. If you have any questions pertaining to your relocation, please contact (relocation coordinator) via email at _____ or by phone at _____

Sincerely,

APPENDIX D: RELOCATION BUDGET

Curtis Apartments Phase One Worcester MA	
HOU Planning, Relocation and Re-Occupancy Budget	
Worcester Housing Authority & Trinity Financial	
Phase One: 72 apartments	
This budget reflects relocating 72 Phase One households, maintaining contact with relocated residents and updating household data during construction, and coordinating move-backs to redeveloped Phase 1 18-24 months after relocation.	
Phase 1 Planning & Consulting (June-August 2022)	
Relocation Plan	\$4,000
Consulting (including meetings w/ client, resident meetings and notice distribution)	\$2,000
Total HOU Relocation Planning Costs	\$6,000
Phase 1 Relocation Implementation est. Sept. 2022-June 2023	10 months
Senior Level Management	\$27,500
Relocation Coordinator (FTE)	\$36,167
Relocation Coordinator (FTE)	\$45,833
Payroll Taxes and Benefits (38%)	\$41,610
Program Insurance	\$4,500
Office Supplies and Postage	\$2,500
IT & Hardware	\$4,420
Interpreter/Translation Services	\$1,000
Travel	\$1,500
Overhead	\$33,006
Total HOU Relocation Costs	\$198,036
Phase 1 Resident Engagement While Relocated 24 months	24 months
Relocation Coordinator and Senior Staff Support (Remote)	\$37,800
Total HOU Resident Engagement Costs	\$37,800
Phase 1 Re-Occupancy 4 months	4 months
Senior Level Management	\$11,000
Relocation Coordinator (FTE)	\$20,667
Payroll Taxes and Benefits (38%)	\$12,033
Program Insurance	\$2,700

Office Supplies and Postage	\$1,000
IT & Hardware	\$1,768
Travel	\$600
Overhead	\$9,954
Total HOU Re-Occupancy Costs	\$59,722
Total HOU Phase One Relocation, Resident Engagement and Re-Occupancy Costs	\$301,558
Estimated Third-Party Moving Expenses	
Moving Costs (based upon 2BR cost)	\$201,600
Packing Supplies	\$25,200
Packing and Unpacking Assistance (25% hh)	\$32,400
Pest Inspections* includes pest inspections only	\$14,400
Utility (cable, Internet, and phone) Transfers	\$14,400
Security Deposit: 1 mth rent Section 8 only assume 5 hhs	\$11,500
Brokers Fees Section 8 only assume 5 hh's	\$11,500
Credit checks/application fees Section 8 only assume 5 hh's	\$1,250
Dumpster	\$18,000
Transportation	\$7,500
Total Third-Party Relocation Expenses	\$337,750
TOTAL RELOCATION BUDGET	\$639,308