

River West Relocation Plan

HOUSING AUTHORITY OF THE CITY OF TULSA

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I. Introduction

The Housing Authority of the City of Tulsa (THA) and the City of Tulsa announced on July 20th, 2018 that they were one of five cities to receive the coveted Choice Neighborhoods Implementation Grant from the U.S. Office of Housing and Urban Development (HUD). Funded through HUD's Choice Neighborhoods Initiative, THA and the City of Tulsa plan to utilize the \$30 million award to help revitalize and transform Tulsa's Eugene Field neighborhood and stimulate economic development in that area.

Choice Neighborhoods is HUD's signature place-based initiative and its vision builds on the work that has been done by the Neighborhood Revitalization Initiative, an interagency partnership between HUD, the Department of Education, the Department of Health and Human Services, the Department of Justice, and Treasury, since 2009.

Created to revolutionize distressed neighborhoods into neighborhoods of choice, CNI promotes a comprehensive approach to transforming neighborhoods struggling to address the interconnected challenges of distressed housing, inadequate schools, poor health, high crime and lack of capital.

Named one of six finalists for this year's CNI Grant in April, THA rallied more than 43 community partners to come together in an effort to ensure that the best impression was made on the HUD-CNI selection committee during their visit. Having lost its bid for the same grant in 2013, the City of Tulsa was determined to make this year's application as successful as possible.

While located in a potentially desirable area, isolating physical barriers, years of disinvestment, and an over-concentration of distressed, subsidized housing have hindered the Eugene Field neighborhood's potential.

Despite these challenges, THA, the City of Tulsa, and the Tulsa community used a FY 2010 Choice Neighborhoods Planning Grant to create a collective vision that has begun to transform their neighborhood. The Choice Neighborhoods Implementation Grant and significant private and public leverage will accelerate their progress.

With these resources, Tulsa will replace the distressed Riverview Park and Brightwater apartments with high quality mixed-income housing; dramatically improve children's educational outcomes, open new employment opportunities, and increase health care access; and implement catalytic neighborhood improvements that will build upon Eugene Field's assets.

II. Relocation Plan Overview

To implement the Transformation Plan for Riverview and Brightwaters apartments, all households will need to be relocated to comparable dwellings with rights and protections under the Uniform Relocation Assistance and Real Property Acquisition Act (URA).

THA plans to use a combination of resources to provide comparable dwelling units, relocation advisory services, case management, and the physical move of belongings. The residents will be consulted regarding their housing requirements and preferences and counseled to identify and address any special needs such as translation services or accommodations.

The comparable dwelling units include:

- Other public housing developments
- Site-based Section-8 Vouchers
- Portable Section-8 Vouchers
- Homeownership housing (if applicable)
- Other housing (family, friends, etc.)

Tenant Protection Vouchers will be offered to eligible residents.

As part of the relocation plan, residents were surveyed about their moving preferences. Of the respondents in the survey done for all Riverview residents, 161 households responded. The results, listed by percentage, are as follows:

- 46% would like to return to the completed project
- 16% would not like to return to the completed project
- 39% need more information before deciding

THA has hired two Relocation Coordinators who will hold individual meetings with residents to help them make informed choices based on their needs, preferences, necessary accommodations, and best interests for them and their family.

Provisions for resident supportive services are included in the CNI grant to minimize the impact of relocation. Urban Strategies, Inc. (USI) will support seven Case Managers who will assist residents in maintaining access to daycare, early childhood education, schools, transportation to jobs, etc. These case managers will continue to provide services throughout the entire grant activity period, including the re-occupancy phase of the project.

The process to relocate residents includes providing notices, relocation advisory meetings, identifying comparable housing, providing transportation to view housing options, assistance in securing utility services, the physical moving of belongings, and re-occupation for those who wish to return to the new buildings.

A General Information Notice (GIN) was delivered by hand to all residents on September 5th, 2018. This notice informed residents of the overall project, the need to relocate them at some future date, their rights and protections under the URA, and the services that will be made available to them. (See GIN Appendix).

Relocation Coordinators will meet with the heads of households to explain all of the relocation options and types of assistance available, including, but not limited to, physical moving options and what resources are available. During one-on-one consultations, the advisors will also identify the needs and preferences of the residents, obtain contact information and the best times they can be reached, and identify and requested accommodations and special needs.

Once options have been fully explained to the residents, and individual relocation plans have been created, residents will be given a list of comparable units based on their needs and preferences. Once units have been identified, resident security deposits will be transferred to the new property manager (any additional deposits required will be paid by THA).

Residents can physically move their belongings on their own, per the options provided under the URA, and be reimbursed for actual expenses or given a flat payment based on the number of rooms in their current unit. They can also opt to have THA undertake the physical move at no cost to them.

Those residents who opted to return to River West will be notified by Relocation Phase of the opportunity to return when the new units are completed. The same physical moving options are made available to them, and THA will continue any supportive services needed for the return move.

Actual household moving costs will vary depending upon the relocation options chosen. however. THA has estimated the entire relocation budget to be \$3,404,000.

Non-Discrimination Policy

THA shall comply fully with Title VI of the Civil Rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974), Executive Order 11063, Section 504 of the Rehabilitation Act of 1974, and any legislation protecting the individual rights of residents, applicants or staff, which may be subsequently enacted.

The agency will reference Handbook 1378 that combines all statutory, regulatory and HUD guidance into a single reference source.

Summary of Uniform Relocation Act (URA) Requirements

Because the River West Transformation Project involves demolition of all existing housing on the site and a relocation period longer than one year, all eligible Brightwaters and Riverview residents will receive the relocation assistance required by the URA for a permanent move. This assistance will not prevent a qualifying household from applying for a new unit in the redeveloped River West community. This plan will encourage all residents to consider returning to the new community. Residents will be given a preference in applying to return to the new community as shown in the “Right to Return & Re-occupancy Policy” section of this plan.

This Relocation Plan addresses each of the five provisions of the Uniform Relocation Act (URA).

Notices (For more information, see Section VI of this plan)

The following notices will be provided to each Riverview and Brightwaters household in compliance with the URA notification requirements for residents in developments scheduled for demolition.

- General Information Notice (GIN) – Hand-delivered on September 5th, 2018
- Notice of Eligibility for Relocation Assistance
- 90-day Notice to Vacate
- 30-day Notice to Vacate (as necessary)
- Eviction Notice (as necessary)
- Project Update Notice
- Notice of Return

A description of these notices appears in Section VI of this Relocation Plan.

Advisory Services and Counseling (For more information, see Section V of this plan)

Relocation advisory services shall include personal meetings with each household to:

- Determine its needs and housing preferences
- Explain relocation benefits and services, including eligibility requirements and procedures for receiving benefits and services.
- Explain the relocation schedule
- Advise on comparable replacement housing that may be available
- Provide households considering Section 8 relocation with current lists of suitable rental housing
- Provide transportation to view replacement housing options

In order to reduce the burden of relocation, THA has hired 2 Relocation Coordinators, and is partnering with Urban Strategies, Inc. to provide Case Management for residents to be relocated as a result of the River West Transformation Plan. All relocation counseling, Section 8 intake processes and supportive services counseling will occur at the Riverview Community Center office or in the resident’s unit, as requested.

All information provided to residents regarding relocation will be offered in any language or means necessary to meet the needs of residents.

Replacement Housing (For more information, see Section V of this plan)

THA must assist each household in finding at least 3 comparable replacement dwelling units. Replacement housing will be provided on a non-discriminatory basis, in compliance with Fair Housing and other Civil Rights laws.

To be comparable, a replacement dwelling must: 1) meet HUD Housing Quality Standards; 2) be functionally equivalent to the household’s existing dwelling unit; 3) be located in an area that offers access to economic opportunities, public transportation, and other services that meet the residents’ needs and preferences; 4) not increase the household’s combined rent and utility costs following relocation.

The offer of another public housing unit is considered a comparable replacement dwelling unit for purposes of compliance with URA. Other publicly assisted housing (i.e. housing under the Section 8 Housing Voucher Program) is also considered a comparable unit for this purpose.

Relocation Benefits (For more information, see Section V of this plan)

URA required relocation benefits include a rental assistance payment (under certain circumstances) and payment of moving and moving related expenses.

Rental Assistance Payment: This payment may be given to households to ensure its combined rent and utility payment does not increase after relocation. Because the Public Housing and Section 8 programs limit a household's combined rent and utility payments to 30% of its adjusted income, residents who choose to relocate within these programs are not likely to receive this payment.

If housing not exceeding the Total Tenant Payment is available, but a household with a Tenant Protection Voucher chooses to lease a unit where the family's share of rent exceeds the Total Tenant Payment, the family will be responsible for the difference between the voucher standard and the total rent. Payment is not triggered if a family chooses a higher cost unit.

Moving Expenses: All households eligible for relocation assistance will receive moving assistance required for a permanent move. This assistance includes payment for actual moving costs and related relocation expenses, so long as those expenses are reasonable. Each eligible household may choose how to receive their moving assistance payment from a range of alternatives, described in Section IV of this Relocation Plan.

Appeals (For THA's Appeal procedure, see Section IX of this plan)

The URA requires that this Relocation Plan include an opportunity to appeal if they disagree with their eligibility status for relocation assistance. In these cases, residents may appeal through the Housing Authority's usual grievance procedure.

III. Relocation Team and Contact Information

THA’s Vice President of Strategic Planning & Intergovernmental Affairs, Jeff Hall will serve as the project manager and oversee all operations under this Plan. Mr. Hall will supervise the entire relocation process from the issuance of notices to re-occupancy at the project’s completion. Along with the team of Relocation Coordinators, he will work closely with on-site management staff to ensure residents are given notifications, housing search counseling, data tracking and other relocation services needed for the successful rehousing of residents. Relocation staff persons have participated in HUD relocation training to ensure adherence to and the proper execution of URA policies.

Relocation Coordinators will conduct outreach and assessment of needs and facilitate the creation of Individual Relocation Agreements (IRA). They will work with the residents throughout the entire relocation process to ensure access to eligible benefits and services, remove barriers to successful relocation, and coordinate physical moves. They, along with the Case Managers and on-site management staff, will ensure that proper records are kept on all relocation activities.

Housing Choice Voucher (HCV) program staff, including Certification Specialists, Lease and Contract Specialists and Inspectors, will be responsible for assessing eligibility and issuing the Tenant Protection Vouchers (TPV). They will provide outreach and training for new voucher holders and administer all related program requirements.

Urban Strategies, Inc. (USI) will coordinate Case Managers, who will provide supportive services to the residents to reduce or eliminate barriers to successful relocation.

Housing Partners of Tulsa (HPT) staff are available for homeownership advisory services and referrals for residents considering purchasing a home, either through HPT’s Homeownership Program or on the private market.

The on-site management staff are available to explain the relocation processes and timelines, and to make internal referrals that will ensure resident needs are being addressed under this plan. Staff persons at the development office are available to residents for questions, referrals and packing materials.

Contacts

Vice President of Strategic Planning & Intergovernmental Affairs
Jeff Hall
(918) 581-5911
Jeff.Hall@tulsahousing.org

Relocation Coordinator
Leslie Gross
(918) 581-5795
Leslie.Gross@tulsahousing.org

Relocation Coordinator
Stephanie Reisdorph
(918) 581-5794
Stephanie.Reisdorph@tulsahousing.org

Vice President of Rental Assistance
Terri Cole
(918) 581-5767
Terri.Cole@tulsahousing.org

IV. Eligibility for Relocation Assistance

Residents Not Eligible for Relocation Assistance

Generally, existing households currently living at Riverview and Brightwaters apartments will be eligible for relocation assistance under the URA in connection with the River West Transformation project. Below are the cases in which a resident would *not* be eligible for assistance:

The following types of households will not be eligible for relocation assistance:

- A household evicted for serious or repeated violations of the terms and conditions of their lease;
- A household having no legal right to occupy the property under state or local law
- A household occupying the property for the purpose of obtaining relocation assistance;

Once households are given the Notice of Eligibility for Relocation Benefits, THA will evaluate the cause for any eviction on a case-by-case basis to assure that eviction of the household would not have occurred but for the project. In this case, the eviction would not keep the household in question from obtaining relocation assistance under the URA. Evictions for drug-related, non-payment of rent and related lease violation causes do not meet the criteria for this situation.

Residents Eligible for Relocation Assistance

This section describes who is eligible for relocation benefits and advisory assistance, as well as the types of assistance offered by THA. Households will be eligible for relocation assistance according to the following time frames and criteria:

- A. **Households that moved between the GIN date and the approval of this Relocation Plan.** All households in this category are eligible for Advisory/Case Management services through Urban Strategies, Inc. Eligibility for preference to return to the new redeveloped community upon completion of construction, and eligibility for relocation benefits may be limited based on the move location and reason as follows:
 1. Households that voluntarily left the site during this period after obtaining a Section 8 voucher (unrelated to this Revitalization project) and successfully leasing a unit under the Section 8 program. These households are eligible for: (1) Advisory/Case Management services; and (2) reimbursement of moving expenses where the Housing Authority did not undertake the move and pay for reasonable relocation expenses.
 2. Households transferred by THA to another public housing community for administrative reasons relating to a housing quality issue (i.e. health hazard, severely under-housed). These households are eligible for: (1) Advisory/Case Management services; (2) reimbursement of moving expenses where the Housing Authority did not undertake the move and pay for reasonable relocation expenses; (3) preference to return to the new community; and (4) moving assistance related to re- occupancy.
- B. **Households that moved voluntarily after the date of the General Information Notice (unless covered under “a” above).** These households are eligible to participate in services under Case Management and are eligible for preference to return to the new community upon completion of

construction. Because these households were advised not to move before approval of the Relocation Plan, and chose to do so voluntarily, they will not be eligible for relocation assistance. THA will provide relocation assistance related to re-occupancy for qualifying households. THA will make a good faith effort to locate these residents for purposes of offering community and supportive services and re-occupancy.

- C. **Households having their lease terminated by THA at any time for good cause (unrelated to the project), or that vacate their units without proper notice for any reason.** These households will not be eligible for relocation services or benefits and will have no preference or right of return to the new community. THA will make no effort to locate or track these residents and they will not be eligible to participate in the Community and Supportive Services Program.
- D. **All other households (not falling into category a, b, or c above) that relocate after approval of this Relocation Plan.** These households are eligible to participate in services under Case Management and are eligible for preference to return to the new community (if they meet applicable eligibility criteria) upon completion of construction. These households will receive the full relocation benefit package, and relocation assistance related to re-occupancy (after meeting applicable eligibility criteria).

All personal possessions must be removed from the housing unit at the time of relocation. The head of household must complete the move-out process with the property manager before relocation benefits are paid, except to the extent that the head of household demonstrates the need for an advance payment in order to avoid or reduce hardship, in which case THA shall issue the minimum amount as appropriate. The unit must be left in a broom swept condition, free of any furniture, clothing, trash and food (including in stove or refrigerator) in accordance with the lease.

Each eligible household is entitled to only 1 relocation benefit packet. The splitting of a household into more than one unit for relocation purposes will be permissible when two adult members of the household qualify under occupancy guidelines. In such rare cases, relocation benefits may be prorated accordingly and reasonably.

V. Types of Relocation Benefits

All eligible residents who are relocated in the context of this funded project will receive the appropriate services and benefits required under the URA.

Resident Advisory Services

Residents will be contacted as soon as possible (per relocation phase) for a one-on-one meeting with a Relocation Coordinator for initial assessment of their needs and preferences. Coordinators will attempt to identify any barriers to relocation, or any Section 504 accessibility accommodations required. They will inform residents of their rights and protections under the URA and explain the housing options available to them.

The advantages and disadvantages of each housing option will be explained, and any questions answered. Residents will be asked to certify with their signature that they received and understood the options available to them, a copy of which will be given to the resident and the original retained in personal relocation records.

After initial consultation, and after all the residents' concerns have been addressed, the residents will be asked to choose their relocation options, choose if they would like to return to River West when the project is completed, and then to sign the Individual Relocation Agreement (IRA). The signed IRA will be the impetus for the residents housing search activities and be used by THA in planning forthcoming relocation activities.

Additional services available throughout the relocation process include, but are not limited to:

- Language translation services;
- Explanation of the dislocation allowance;
- Calculations of benefits;
- Identification of comparable units that meet resident needs, including units outside areas of poverty and minority concentrations and/or have the necessary accessibility features.;
- Provision of area maps and information about neighborhoods;
- Site tours;
- Transportation - provided through bus tickets, cabs, and mileage reimbursement;
- Packing and unpacking of belongings will be provided by the contracted movers, if requested;
- Assistance in the establishment and/or transferring of utilities;
- Assistance registering children in school or day care;
- Setting up appliances; and
- Scheduling movers.

All affected residents are eligible for and are encouraged take advantage of services provided by the Relocation Coordinators to ensure successful transition to a comparable dwelling.

Case Management

USI will hire 4 Case Managers, a Case Manager Supervisor, and Education Liaison, 2 Outreach Workers, and a Senior Project Manager, which provides a case management ratio of 75 to 1. The Case Managers

are responsible for providing comprehensive case management, referral and seamless coordination with community and supportive service activities that promote economic self-sufficiency for families, enhance quality of life for seniors and the disabled, and increase opportunities for residents. This position will work with a team of social workers, case managers, relocation and employment specialists, and other professionals to identify appropriate strategies and assist families.

Mobility Counseling

Well in advance of any relocation, USI will work with THA and McCormack Baron Salazar (MBS) to support a relocation planning and resident education process that is consistent with HUD regulations. Specialized Family Development Plans (FDPs) will be required for each head of household to address their relocation and re-occupancy goals.

These specialized FDPs will be supported by a case management processes that are consistent with the relocation plans, URA and all other pertinent HUD regulations. Mobility support services will ensure that original residents have the advice, information, financial resources, and service supports that they need to plan and execute their moves into the new CNI housing, or alternative housing of their choice.

Case managers will:

- Help all Target households identify housing needs and relocation preferences;
- Connect residents with relocation assistance;
- Develop a proactive plan to address and alleviate real or potential risks or barriers families face related to the move;
- Coordinate with Tulsa Public Schools to ensure minimal disruption for families with school-aged children.

Issues addressed will, at a minimum, include:

- Any factors that could negatively impact residents' relationships with their landlord, including their ability to pay rent on time and otherwise comply with the terms of their lease agreements (both prior to relocation and afterwards);
- Barriers to turning on utility services in their new homes;
- Logistical challenges moving to their new homes, especially for seniors, disabled residents and other vulnerable individuals.

For residents choosing a permanent move from the neighborhood using a Housing Choice Voucher, additional coaching will be provided to ensure they move into a neighborhood of opportunity, with strong performing schools, and access to needed supports and services, including transportation. Case Managers will continue to support these families in their new neighborhood to ensure that they are doing well, and not growing isolated. USI will partner with THA, CAP Tulsa, and other stakeholders to identify high quality housing options with reputable landlords for residents to consider as they make informed choices.

Identification of Comparable Housing

Every effort will be made to assist residents by explaining the housing options available to them and helping them to find permanent housing. Using the resident needs and preferences established during consultation as a guide, the Relocation Coordinators will identify a minimum of 3 comparable units and provide a listing of addresses and contact information to each tenant in writing.

In addition to meeting the bedroom size required and the financial means of the resident, comparable units are defined as being functionally equivalent to the existing unit – not necessarily exactly matching the current unit. Additionally, comparable units are decent, safe and sanitary, are vacant and available to rent, are reasonably accessible to one’s place of employment, are generally well -located in respect to public and commercial facilities, are free of serious health violations or adverse environmental conditions, and follow federal, state and local fair housing regulations.

If requested, the Relocation Coordinators can arrange site visits and assist with transportation to view potential units. Accessibility features must be comparable to what the resident has currently; if necessary, and in its sole discretion, THA may pay to install a feature or remove a barrier.

All units will be reviewed by staff prior to being offered to residents to ensure they are decent, safe and sanitary and meet the definition of “comparable”.

Once suitable housing has been selected, security deposits will be transferred, and a move-out date established. Relocation Coordinators remain available to assist with the establishment or transfer of utility services, scheduling the move, and other supportive services. Payment allotment dispersals are made after the resident has vacated the unit.

Replacement Housing Options

NOTE: If a household is under- or over-housed (i.e. currently lives in a unit with too few or too many bedrooms for their family size), they will be relocated into a right-sized unit based on the occupancy standards of the replacement housing type.

Another Public Housing Unit

THA owns and manages 14 public housing communities (11 family sites and 3 high-rises for senior citizens) to which residents can be relocated. THA currently has vacancies available across these developments and available units will be offered as they become available. The average vacancy rate across all developments is 5%, which is about 150 vacancies per month.

By choosing another PH unit, the resident will have no additional applications or fees and no establishment of utilities. Additionally, their rent calculations would remain the same. However, while the developments are scattered throughout the city of Tulsa, the resident may have fewer choices regarding the neighborhood in which they wish to reside than if they went into the private rental market.

Any Riverview resident, regardless of household income, is eligible for this option.

Mixed-Finance Unit

Residents who meet income and occupancy standards can choose to lease a unit in Country Club Gardens, a mixed-finance development. This development has designated units for low-income residents. Rents for these units are calculated at 30% of adjusted gross income.

Tenant Protection Voucher (TPV)

Residents who are eligible for the Housing Choice Voucher (HCV) program based on income may choose to receive a TPV and rent any unit in the private market that participates in the program and adheres to its guidelines. Rent is calculated at 30% of adjusted gross income.

This voucher gives the resident greater relocation choices as over 1027 landlords and/or apartment communities have active voucher participants (portability to another city which operates an HCV program is also allowed). The voucher stays with the tenant so long as they remain income eligible and are compliant with program requirements.

Under this option, the resident would need to complete an application process and establish a relationship with a new property manager. They also may be required to establish new utility services, which can be done with the assistance of the Relocation Coordinators.

Homeownership

Through partnerships with area counseling and financial literacy agencies, THA has encouraged homeownership to its residents as part of its ongoing supportive services model. The availability of housing counseling agencies, first-time home-buyer grants and the potential use of Replacement Housing Payments (RHP) makes this option a possibility for higher-income residents. These services may be accessed through Housing Partners of Tulsa (HPT).

Other Affordable Housing

There are 36 project-based HUD subsidized developments in the Tulsa Metro Area. A comprehensive list of affordable private rental units will be provided to residents along with the supportive services available under the URA and this Relocation Plan. This option might be best for affected residents who wish to leave public housing and are over-income for a voucher or other housing subsidy. The more desirable areas and complexes may have waiting lists, and residents may be subject to application processes, background and credit checks.

Replacement Housing Payment (RHP)

The RHP is intended to cover any increase in the resident's monthly housing costs (rent and utilities), at a comparable unit, that exceeds what they would pay if they had not been required to relocate and were still living in public or subsidized housing at Riverview or Brightwaters apartments. This is also known as a "gap" payment.

The monthly RHP is calculated by comparing the rent and utilities at the existing unit with a comparable unit. The amount of the RHP is the difference a tenant must pay to meet the obligations at the new, comparable unit. Payment of the RHP will be made to the resident in monthly installments beginning with the first rent payment. The duration of benefits is 48 months of assistance, or until the maximum subsidy amount is met.

A resident who receives an RHP may also use it as down payment assistance for the purchase of a single-family house – through the private market or through THA – in which case the allotment is dispersed in a one-time lump sum. Calculation of the lump sum is the difference of current rent and utility costs and that of a comparable unit (one month of RHP) times the maximum allotment of 48 months. This is dispersed at the time of closing.

Payment for Rent Deposits

The URA does not require that THA pay a security deposit for a household choosing a voucher as a relocation housing preference. However, THA views security deposits required by most private landlords to be a burden on residents and their ability to find suitable housing.

THA has chosen to include payment of a security deposit in an amount equal to or less than one month's contract rent as part of the relocation benefit package. If the resident relocates to another THA public housing unit, the deposit will simply transfer to that unit. For residents moving to the private housing market and/or using a TPV, THA will forward the deposit plus any additional deposit required to the new property manager, as possible, with the contingency that the deposit be returned to THA at the end of the new lease.

Appliances

Residents who choose to move into another THA property will be provided with a stove and a refrigerator. For those that do not move into another THA property, the Relocation Coordinators will work on a case-by-case basis to ensure residents have access to necessary appliances.

Physical Moving Assistance

Affected residents will be given three physical moving assistance options: THA will undertake the move, the resident can move themselves and be reimbursed for their actual expenses, or the resident can move themselves and receive a fixed payment based on the number of bedrooms.

Regardless of the option chosen, THA will provide moving boxes, tape, shrink-wrap and markers for packing belongings. Residents are expected to pack on their own unless they request an accommodation (i.e. elderly, disabled).

THA Contracted Movers

THA will undertake the physical move by contracting with professional movers at no cost to the resident. The Relocation Advisor works with the resident to coordinate and schedule the move. If a resident chooses this option, they are entitled to a one-time dislocation allowance of \$100, to be mailed to the resident at their new address after the completed move.

Reimbursement for Moving Expenses

Any displaced residential occupant is entitled under the URA to actual and reasonable moving and related expenses. These expenses may include:

- Transportation of the affected resident and personal property
- Transportation costs for a distance up to 50 miles
- The expenses of packing and unpacking of personal belongings
- Reconnection of utilities including gas, electric, phone, and cable services, if the resident had active services at the time of the scheduled move
- Mileage reimbursement at \$0.55 per mile.

- The advance loan payment for a moving vehicle if the resident presents a copy of a rental agreement that shows the deposit for a rental truck or trailer, THA may advance a loan which will be deducted from the reimbursement
- Down payments to establish connection fees
- Storage of appliances if not available at the new unit
- Any other moving related expenses determined eligible by THA

To receive reimbursement for actual and reasonable moving costs, residents must submit a claim within 18 months of the date of the move. The HUD 40054 form, "Residential Claim for Moving and Related Expenses" will be used. A resident may request assistance from relocation staff with filling out this form. Claim for reimbursement will be subject to review and approval by the Relocation Coordinator.

Affected residents may waive their rights to a relocation payment by refusing to file a claim for the payment and/or by signing a written waiver which describes the specific monetary assistance waived and the pertinent law and regulation under which it is available, and by indicating that the person understands that, absent the waiver, they cannot be displaced unless provided the prescribed assistance. (See Appendix)

Fixed Moving Expenses Allowance

Residents may choose to make their own moving arrangements and are entitled to a fixed allowance based on the number of rooms of furniture in their current unit. THA will assist residents in determining the amount for which they are eligible. If requested, THA will consider payments for an additional room if the resident has a special need, such as medical equipment or a piano, or an inordinate amount of storage.

For THA to sufficiently plan for and coordinate all the physical moves required under this Plan, residents will be asked to choose a moving option on the Physical Move Options form. They will retain a copy and the original will be kept in their relocation file. (See Appendix)

Occupant Owns Furniture							Occupant Does Not Own Furniture		
Number of Rooms of Furniture									
1 room	2 rooms	3 rooms	4 rooms	5 rooms	6 rooms	7 rooms	Additional Room	1 room/no furn.	Add'l room no furn.
700	900	1100	1300	1500	1700	1850	200	350	100

VI. Resident Notification

Notification Process

All affected residents will be provided written notices by personal delivery or via certified and registered first-class mail, return receipt requested. Each notice shall be written in plain, understandable language. Persons who are unable to read and understand the notices will receive appropriate assistance to ensure effective communication. Notices will be translated for residents with Limited English Proficiency.

All mailings will remind residents to notify THA of any address changes. **It is the resident's responsibility to inform THA of any change of address and contact information.**

At specific times before and during the relocation process, formal notifications will be sent to residents as required by the URA. The notices include: General Information Notice, Notice of Eligibility for Relocation Assistance, 90-day Notice to Vacate, 30-day Notice to Vacate (as needed), Eviction Notice (as needed), Project Update Notices, Notice to Return.

THA will send Project Update Notices at least every 6 months updating residents on the demolition and reconstruction of the development.

Types of Notices

General Information Notice (GIN)

The GIN is an advisory notice sent to all affected residents explaining the project, activities that are planned, assistance that is available, and potential relocation payments that are available under the URA. Moreover, it advises residents of the following:

- That they should not move before receiving a notice indicating eligibility for relocation assistance;
- That they will receive information about the relocation assistance they are eligible for and the procedures for receiving assistance;
- That they will not be required to relocate without receiving a 90-day Notice to Vacate;
- That they will not be required to move unless at least three comparable dwelling units have been made available;
- That they will receive reasonable relocation advisory services, including relocation referrals and other necessary services;
- That they must continue to pay rent and meet all other lease obligations in order to be eligible for relocation payments or assistance under the URA;
- Their right to appeal THA's determination of eligibility for URA assistance;
- Their right to return to the project; and
- That they are provided with contact information for assistance and questions.

Notice of Eligibility for Relocation Assistance (NOE)

The NOE advises affected residents about their eligibility to receive relocation assistance. It is specific to each household and outlines their options and benefits. The notice will advise the residents of the following:

- Their eligibility for relocation assistance and the effective date of their eligibility;
- The available relocation assistance, the estimated amount of assistance based on their individual circumstances and needs, and the procedures for obtaining the relocation assistance;
- Their right to appeal and pertinent procedures;
- Their right to return when the project is complete; and
- Comparable available units.

90-day Notice to Vacate

This notice will advise residents of the specific date by which they will be required to vacate the property. This notice will be provided no later than 90 days prior to the date the residents must vacate their unit.

30-day Notice to Vacate (as needed)

This notice will advise residents of the specific date by which they will be required to vacate the property. This notice will be provided no later than 30 days prior to the date the residents must vacate their unit.

Eviction Notice (as needed)

An eviction notice will be given if substantial lease violations exist. If a resident is evicted for lease violations, they will lose eligibility for URA assistance. However, Relocation Coordinators will attempt to resolve any issues that would result in eviction prior to the 90-day Notice to Vacate. THA will not give eviction notices to circumvent the regulatory services and protections afforded to residents.

If, after proper notification and after every reasonable attempt to assist the resident has been made, a household refuses to vacate the unit by the required date, THA will seek legal redress per its eviction procedure and through the Tulsa County court system. All evictions will comply with the URA.

Project Update Notice

If the project undergoes changes to its schedule, affected residents will receive modified relocation notices or development updates as they become available. This notice will be updated and sent at least every 6 months.

Notice to Return

THA will notify residents in writing when a unit in the completed project is available to them. This notice will be provided reasonably in advance of the expected return date. The notice will inform residents of the following:

- The entity with primary responsibility for managing the relocation;
- The address of the resident's assigned unit and information regarding the size and amenities of the unit;
- The date of the resident's return move, or if the precise date is not available, a reasonable estimate of the date which shall be supplemented with reasonable additional notice providing the exact date;
- That THA will reimburse the resident for all reasonable out-of-pocket expenses incurred in connection with the return relocation; and

- The resident's options and the implications of those options if the resident determines that he or she does not want to return not the Covered Project and wants to decline their right to return.

VII. Right to Return & Re-occupancy Policy

At the time of project completion, all residents who wish to return and have been lease-compliant throughout the relocation period may return to River West as part of the River West Transformation project. This is a Choice Neighborhoods program requirement. THA maintains a “No Re-screening upon Return” policy with existing residents.

THA will begin notifying residents on their return dates upon receipt of the Occupancy Permit by the City of Tulsa. Notices will be sent via certified mail to the last known address of each resident who has elected to return to the new site.

It is important to note that market rate and affordable units will be constructed alongside the replacement housing units, and that the residents’ priority rights to return apply only to the replacement housing units.

NOTE: The right to return is not a right to any specific unit.

Preference for Returning Residents

When the new units are ready to be leased, a returning tenant will be given priority to lease an assisted unit before any other eligible households. If the tenant chooses not to return to the completed development, they may choose to keep their tenant-based voucher assistance, subject to appropriations and availability, provided under Section 8 of the United States Housing Act of 1937. They will maintain priority on the Section 8 program waitlist until the end of the relocation period.

NOTE: Residents who voluntarily move prior to relocation do not have this return preference.

If a household is “rightsized” (e.g. splits into two separate households) through the relocation resulting from Choice Neighborhoods, the original head of household will have the right to return. Once all the original heads of households have been housed, THA will offer the second household any units that are available. If no units are available, then the second household will be moved to the top of the waiting list. Both the original and second households are required to be lease-compliant at the time of relocation and throughout relocation.

Once all eligible Riverview and Brightwaters residents have been given the chance to return to River West, THA will begin leasing any vacant assisted units to other public housing residents.

Waitlist Process

In order to give equal opportunity to all existing residents, the return process will be kept separate between Brightwaters and Riverview. THA will reserve two groups of new units: one for Brightwaters, and one for Riverview.

Because lease-up of new units will occur over 6 phases between 2021 and 2023, new units that become available will be occupied based on a waitlist. There will be a separate waitlist for both Riverview and Brightwaters residents.

The waitlists will be based on the following criteria (in order of priority):

1. Relocation Phase (First out, first in)
2. Unit size
3. Lottery
 - a. Households that fall under the same category within criteria 1 and 2 will be randomly waitlisted within that group.
 - b. Example: Household A and B were relocated in Phase 1 and both need a 2-bedroom unit, but there is only one available. THA will use a random lottery to select either Household A or Household B for this unit. The other household will remain at the top of the waitlist until another subsidized 2-bedroom unit becomes available.

VIII. Record Keeping

THA will maintain records of each household, as required by law, for a period of at least 4 years after the development of the community has been completed or the date required by the applicable program regulation, whichever is longer.

A relocation tracking system has been developed and employed by THA to locate residents during and after relocation and throughout the reconstruction phases. THA will keep evidence verifying that all residents receive timely written notices regarding the following items: Relocation Plan, General Information Notices, 90-Day Notice, Notice to Vacate, and other pertinent notices pertaining to the redevelopment process. The tracking system will contain records for each household that includes, but shall not be limited to, the following information:

- Name and Address;
- Social Security Number;
- Language spoken;
- Required bedroom count;
- Family composition;
- Special needs (disability, reasonable accommodations);
- Record of units offered, date and location;
- Section 8 Certification (if applicable);
- Current rent;
- Income;
- New unit address;
- Copies of claims for moving and related expenses; and
- Any and all other information in enough detail to be compliant with all HUD applicable relocation policies and regulations as outlined in Chapter 6 of the HUD relocation handbook.

IX. Appeals Process

Residents who are subject to relocation are entitled to request a review of any THA determination concerning eligibility for relocation benefits, the amount of a relocation payment, and/or the adequacy of the housing to which the resident was referred.

At the time that the relocation assistance is offered, staff will inform the resident of the relocation appeal procedure. A resident will have 60 days after the receipt of a written offer of relocation benefits to file an appeal. The resident can request assistance from the agency in writing the appeal. The appeal must be delivered to the THA Central Office within 60 days.

Upon receipt of the written appeal, a relocation dispute meeting between the resident, the Relocation Coordinator, and the Riverview property manager will be scheduled within 10 business days. Residents may be represented at the meeting by a person of their choice and at their own expense. Interpreters will be provided upon request. A written decision will be issued by the Relocation Coordinator within 10 business days.

If the matter cannot be resolved at the relocation dispute meeting, the resident has five days from the receipt of the written decision by the Relocation Coordinator to file an appeal with the Public Housing Review Board consistent with the Resident Grievance Procedures. (See Appendix)

If the tenant is dissatisfied with THA's determination on the appeal, further redress can be sought through the courts. Appeals regarding relocation can only be based on a dispute about the level of relocation assistance and not on the requirement to vacate the unit. If a resident is uncooperative and refusing to vacate by the end of their time allotted, THA will pursue eviction action per its standard eviction procedure.

X. Relocation Budget

The moving costs are based on contracting bids received and are per bedroom size. Based on resident survey responses, it is estimated that 49% of residents will be re-occupying the new building as units become available and will require a second physical move.

Relocation Budget	
THA Relocation Coordinators (2)	\$750,000
Resident Moving Costs	\$837,000
Reconnection of Utilities/Security Deposits	\$115,000.00
Relocation Counseling/Landlord Incentives	\$50,000.00
Accessibility improvements	\$1,000.00
Housing Assistance Payments	\$1,651,000.00
TOTAL	\$3,404,000.00

THA has allocated these funds from the CNI grant to ensure permanent housing for all of the affected residents. Relocation Coordinators will ensure that relocation activities are conducted in compliance with the URA and regulations set forth at 49 CFR Part 24.

Glossary of Terms

Choice Neighborhood (CN) – A plan that transforms distressed HUD housing and addresses the challenges in the surrounding neighborhood. The program is designed to start critical improvements in neighborhood assets, including vacant property, housing, services, and schools.

Choice Neighborhood Implementation (CNI) – Choice Neighborhoods Implementation Grants support those communities that have undergone a comprehensive local planning process and are ready to implement their “Transformation Plan” to redevelop the neighborhood.

Comparable Dwelling – Housing that is offered to a relocating family that is comparable in size and amenities to the unit being demolished.

Gap Payment – Another term for the Replacement Housing Payment (RHP). It is the “gap” between what the tenant is currently paying and what they will need to pay at a new location (not to exceed the maximum payment standard).

U.S. Department of Housing and Urban Development (HUD) – The federal agency that provides funding and administration of government-subsidized housing and development activities such as public housing and the CNI grant.

Low Income Housing Tax Credit (LIHTC) – Gives incentives for the utilization of private equity in the development of affordable housing. Units or properties developed with LIHTC are income restricted. Tenants must not have income over 60% of CMI in order to be able to reside in them.

Mixed-Finance Development – Units developed with the mix of public, private, and non-profit funds. These developments have a mix of designated units based on income and are designed to promote economic diversity.

Replacement Housing Payment (RHP) – The Replacement Housing Payment makes up the difference in housing costs between the dwelling unit the resident is being displaced from and the housing cost for the actual unit a displaced household moves to, or the unit the agencies identifies as the comparable unit (whichever is lower). Housing cost is the monthly rent and estimated average utility costs of the dwelling. For public housing residents, the housing cost is the calculated rent and utility allowance based on the current rent policies in place, generally 30% of the tenant’s average adjusted monthly income. The RHP is calculated to cover the cost differential for 48 months.

Tenant Protection Voucher (TPV) – A rental subsidy for standard-quality units that are chosen by the tenant in the private housing market. To the voucher holder, they are the same as Housing Choice Vouchers.

Uniform Relocation Act (URA) – The federal legislation that governs rights and benefits of households forced to move due to activities utilizing federal funding.

Appendices

Appendix 1	Relocation by Phase
Appendix 2	General Information Notice (GIN)
Appendix 3	Notice of Eligibility
Appendix 4	90-Day Notice to Vacate
Appendix 5	Claim for Moving and Related Expenses
Appendix 6	Grievance Procedure
Appendix 7	Tenants Displaced from Their Homes Brochure
Appendix 8	Tenants Displaced from Their Homes Brochure (Español)
Appendix 9	Waiver of Relocation Assistance