

An Early Assessment of Off-Site Replacement Housing, Relocation Planning and Housing Mobility Counseling in HUD's Choice Neighborhoods Initiative

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I. Introduction

The Department of Housing and Urban Development's (HUD's) Choice Neighborhoods Initiative (CNI) provides funds for public housing authorities and other local entities to redevelop distressed public or assisted housing in some of the nation's poorest neighborhoods.¹ This brief examines one aspect of CNI: HUD and individual grantees' approach to tenant displacement and relocation.²

CNI's primary focus is on neighborhood improvement and the right of existing residents to return, with the expectation that target neighborhoods will offer better quality of life than other areas where low-income renters might live. But the program is also intended to expand fair housing choices for current and future residents by placing some off-site replacement housing in lower poverty neighborhoods and helping families who wish to move away from CNI developments reach higher opportunity areas. The following study provides a qualitative examination of how HUD and the first two rounds of CNI awardees approach relocation and neighborhood mobility: in particular, whether the CNI program is helping families relocate to high-quality neighborhoods in addition to taking steps toward improving neighborhood quality. As discussed more fully below, both HUD and the CNI grantees have tended to overlook mobility as a required complement to CNI's neighborhood improvement aspects.

1 See Smith et al. 2010 for an overview of CNI requirements. <http://www.urban.org/publications/412092.html>

2 The findings in this report are based on research conducted in the summer and fall of 2012.

II. The Choice Neighborhoods Program

In order to be eligible for Choice Neighborhoods funding, neighborhoods must be high poverty and also have high crime rates, low-performing schools and/or high residential vacancy rates. Whereas the HOPE VI program, CNI's predecessor, focused on rebuilding obsolete public housing and hoped for positive spillover effects on surrounding neighborhoods, Choice Neighborhoods has more ambitious goals. Grantees must combine housing redevelopment and a comprehensive mix of physical, social service and transportation improvements within CNI target neighborhoods—with an emphasis on creating high-quality educational opportunities from early childhood through college. The program is a counterpart to the Department of Education's Promise Neighborhoods initiative, which borrows from the Harlem Children's Zone model.

Ultimately, CNI hopes to spur additional public and private investment to transform struggling neighborhoods into sustainable mixed-income, mixed-use communities.³ CNI is not a poverty "dispersal" program. Rather, it intends to transform target neighborhoods by helping low-income residents achieve economic and educational mobility and attracting higher-income residents. For several CNI grantees, a key aspect of redevelopment is significant retail, commercial and market-rate housing development in target neighborhoods. Thus, the redeveloped HUD-assisted projects may represent relatively small shares of total anticipated housing creation. And in some cases, CNI funding may pay for only a portion of redeveloped assisted units.

At the time of this research, HUD had awarded two rounds of CNI grants (in 2010 and 2011), including five implementation grants of up to approximately \$30 million each and 30 smaller planning grants of about \$300,000 each. HUD awarded another 4 implementation grants and 17 planning grants in late 2012, and requested an additional \$150 million for the program for fiscal year 2013.

Implementation grants directly fund housing development, neighborhood improvements and social services, based on fairly specific proposals submitted by grantees. Planning grants, in contrast, have few explicitly required activities and fund a range of activities necessary to draft viable development plans and build community support. Planning grantees may be early in the redevelopment process and engaged in market research, community or resident needs assessments, identifying financial and service delivery partners, environmental planning, and capacity-building activities. Some of the 30 planning grantees are using the grant period to make fundamental redevelopment decisions such as whether to renovate assisted units or demolish them, and where to build replacement housing.

3 Target neighborhoods vary in size. They must be larger than the assisted housing footprint, and HUD suggests an approximately 2 square mile area is appropriate (Planning grant NOFA p. 11).

Thus far, Boston, Chicago, New Orleans, San Francisco and Seattle have received implementation funds. The grants could support redevelopment of approximately 2,271 assisted housing units, and leverage funding for as many as 10,000 to 15,000 new mixed-income units. With the exception of Chicago, where relocation began prior to the CNI grant proposal, implementation grant sites were scheduled to begin demolition and redevelopment in 2012. The 30 planning sites have identified approximately 7,000 assisted housing units that could be redeveloped. Compared to implementation sites, planning sites are more likely to be in smaller cities and softer housing markets. Three of the sites (Meridian, Missouri, and Wilson and Salisbury, North Carolina) are in non-metro areas. Tables 1 and 2 below describe the implementation and planning sites.

Neighborhood Mobility in CNI

Choice Neighborhoods grants can fund the redevelopment of one or more vacant or occupied public or other assisted housing developments, or of vacant land that previously held assisted units. Thus far, all of the implementation sites and the majority (approximately 26 of 30) of planning sites propose to redevelop occupied units.

As with the HOPE VI program, residents of housing that will be redeveloped will be forced to move, at least temporarily. HUD's expectation is that, at the very least, displaced households will be unharmed from forced moves, but it hopes that residents will benefit. All households displaced by CNI redevelopment have the right to return to replacement housing in their original neighborhood when it becomes available, but HUD acknowledges that not all will do so. One of HUD's stated objectives for CNI—and a metric that will be used to measure success—is that “baseline” residents move to housing and neighborhoods “as good as or better” than redeveloped sites, and experience similar quality of life improvements as residents of transformed CNI neighborhoods (2012 NOFA p. 3).

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Broadly stated, there are three main ways in which households displaced by redevelopment may experience better neighborhood quality as a result of forced CNI moves. First, they may relocate to housing in new low-poverty, opportunity rich neighborhoods. Moves may be to private market housing with a tenant-based Housing Choice Voucher (HCV), or to alternative assisted or public housing units. The moves may be temporary while replacement housing is built, or permanent if the household chooses to remain in their interim housing even after permanent units are available. Second, displaced households may move within the CNI target neighborhood to an alternative assisted unit either permanently, or until on-site replacement housing is built. Presumably, these moves within CNI target neighborhoods will help minimize the potentially disruptive aspects of moves, while also allowing displaced households to enjoy

the neighborhood quality improvements expected from CNI investments. Finally, permanent replacement housing may be located outside of the CNI neighborhood in a low-poverty, high-opportunity neighborhood.

Previous experience with HOPE VI suggests that moving and reaching high-quality neighborhoods can be hard for displaced public housing residents. HOPE VI residents were often in poor health, with a high incidence of chronic illness that complicated moves and economic stability (Manjarrez, Popkin, & Guernsey, 2007). Former public housing tenants may also be at a disadvantage in the private market, and unprepared to manage monthly expenses or utility payments (Briggs & Jacob, 2002).

Of particular concern for CNI is the low rate at which displaced HOPE VI residents returned to redeveloped sites: only approximately 10 to 15% of displaced residents returned to the redeveloped housing—despite some evidence that a much larger share hoped to return when construction was complete (Popkin et al., 2002; Popkin, 2008; Cunningham, 2004). Almost ten years after HOPE VI began, close to 20% of relocatees had left assisted housing entirely, about a third were in alternative public housing, and another third moved to new neighborhoods with vouchers (Kingsley et al., 2003). The low return rate is at least in part because HOPE VI resulted in a net loss of low-income public housing units, and there weren't enough on-site housing units available for all displaced residents. Nevertheless, compared to their original extremely high-poverty public housing, many HOPE VI movers ended up in safer and lower-poverty, if still racially segregated, neighborhoods (Cunningham, 2004; Comey, 2004; Buron, 2004).

While HUD views all aspects of CNI as consistent with its obligation to promote racial and economic integration, two aspects of the program – off-site replacement housing and housing mobility counseling for initial relocation vouchers – are specifically directed to expanding resident choices in lower poverty, less racially isolated areas

This brief provides an overview of CNI's requirements for managing tenant displacement and, to the extent possible at this stage in sites' redevelopment efforts, assesses grantees' replacement housing, relocation and re-occupancy strategies. The five 2011 implementation grantees are included, along with a sample of the 30 planning grantees.

Information about required activities for CNI grantees is primarily from HUD's Notices of Funding Availability (NOFAs) and supporting documents.⁴ Information about individual grantee plans was gathered from CNI proposals, background documents available on HUD and

4 See HUD's CNI website for information:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/cn

individual grantee websites, and publicly available planning documents or studies.⁵ In July 2012, planning grantees were also asked to fill out a questionnaire outlining their current plans (included as Appendix A). Thirteen of the 30 sites completed the questionnaire. These sites are not intended to be a representative sample of all planning grantees. Rather, they provide an early perspective on how planning grantees may pursue replacement housing and neighborhood mobility services for displaced households. Planning grantees in particular may be quite early in the process of determining redevelopment strategies, and only limited information about plans were available for some sites.

The rest of this document is organized as follows. The next section discusses HUD's stated objectives for CNI neighborhood and individual outcomes, and requirements around tenant relocation and mobility. Sections 3 and 4 review implementation and planning grantees' plans for replacement housing and resident relocations. Section 5 concludes.

III. CNI replacement housing and neighborhood mobility-related requirements

A central aspect of CNI is the "one-for-one" requirement that demolished units must be replaced with an equal number of public or assisted units. At present, none of the implementation sites and only 11 of the 30 planning sites are eligible for a waiver of this requirement.⁶ This effectively ensures that most demolished housing will eventually be replaced with hard units, as opposed to vouchers. One hope of fair housing advocates – in response to the weak record of the HOPE VI program – was that some of the replacement hard units would be located off-site, in low-poverty, high-opportunity neighborhoods. As set out below, this does not appear to be happening, at least in the implementation sites.

Replacement housing locations. Grantees are permitted to place new units outside of CNI target neighborhoods. However, the implementation NOFA encourages most sites to place housing either on the original assisted

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5 See HUD's partial list of grantee websites: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/cn/grantees.

6 An exception allows grantees in some jurisdictions to use portable vouchers for up to 50% of replacement units. Sites must meet three threshold requirements to be eligible for a waiver: they must be in counties with persistently high vacancy rates for low-income units (between approximately 7 and 9% between 2000 and 2009); local HCV recipients must have success rates of at least 80% over a 120 day search period; and at least half of all voucher holders in the core-based statistical area (CBSA) must live in neighborhoods with poverty rates below 20 percent. Areas eligible for the voucher exception are identified by HUD: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/cn/fy12funding

housing site or within the broader target low income neighborhoods, and the requirements for off-site location are not designed to steer replacement housing to higher opportunity locations.

Under the NOFA, “off-site” replacement units may be located within 25 miles of the redeveloped housing site in order to comply with fair housing requirements, deconcentrate poverty, or achieve appropriate development density on-site (2012 NOFA, p. 29). Replacement neighborhoods outside CNI target areas cannot have extremely high poverty rates or be racially segregated, and must offer social and economic opportunities “comparable” to those expected in the improved CNI neighborhood. For example, implementation sites must demonstrate that the replacement housing is within one mile of a range of social, recreational, educational, retail and health services, and offer access to economic opportunities. HUD uses the 40% average neighborhood poverty rate to identify areas of concentrated poverty; racial concentration is considered to be a neighborhood minority population rate that is 20 percentage points above the mean for the metropolitan area (MSA).

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The broader requirement to demonstrate economic and social opportunities in replacement neighborhoods is encouraging, but the specific threshold poverty and racial concentration measures set a low bar for off-site locations. At a maximum 40% poverty rate, replacement neighborhoods could theoretically have higher average poverty rates than the CNI target neighborhoods at baseline.⁷ Ultimately, however, the requirement to justify off-site locations and demonstrate access to amenities and services may dissuade grantees from placing housing outside of target neighborhoods—regardless of neighborhood poverty or racial composition criteria. As discussed in more detail below, none of the five implementation sites will build replacement housing outside of the target neighborhood. Of the 13 sites that completed the on-line survey, only 3 currently have plans to build some portion of replacement units outside of the target CNI neighborhoods.

Tenant relocation. Throughout the 2012 implementation grant NOFA, HUD provides some general principles related to tenant relocation, as well as some specific mobility counseling requirements for grantees. The planning grant NOFA refers applicants to general CNI program requirements in the implementation NOFA, noting that all grantees are expected to address full CNI requirements in their final transformation plans. It is presumably in grantees’ best interests to address relocation strategies if they hope to have a transformation plan approved by HUD and eventually apply for implementation grant funds.

⁷ Advocates have sharply criticized this aspect of the NOFA – see http://prrac.org/pdf/fair_housing_comments_on_Choice_Neighborhoods_NOFA_1-14-11.pdf

Relocation service expectations are addressed in two implementation grant NOFA sections: the general program requirements section (III.C.1.a, p. 20), and a relocation and re-occupancy subsection as required in the scoring and review criteria (V.A.3.b.1.(6), p.95). In total, relocation and re-occupancy plans account for up to 3 of 32 possible “People” section points in the CNI applications. Sites must also discuss how relocation-related activities will connect to other services in their broader supportive services strategy section (7 points). In total, 204 points may be awarded to implementation grant proposals. CNI relocations are also subject to the Uniform Relocation Assistance Act, which requires that displaced households receive comparable housing and financial help with moving costs, and that non-white households are offered housing options in racially diverse neighborhoods.⁸

As noted above, the implementation NOFA language implies that displaced residents should have options for temporary relocation. Assuming they choose to remain in assisted housing, most will have three main alternatives. They may be offered an alternative subsidized unit within the CNI neighborhood, or elsewhere in the PHA’s jurisdiction. Or, they can use a portable voucher to move to housing in the neighborhood of their choice. All displaced households retain their right to return to a CNI replacement unit once development is completed, and are to be given priority over other households for as long as replacement units are available and they remain eligible to return. Eligibility hinges on avoiding evictions or lease violations during the relocation period.

The NOFA states more generally that relocation should not lead to *worse* living conditions or environments. All relocatees have a right to case management, counseling and housing search assistance to help make relocation decisions, ensure they remain eligible to return, and find housing in neighborhoods of opportunity if they choose to move with a voucher.

The relocation requirements and outcome goals suggest the potential need for a diverse array of counseling and support services. For example, counseling to help displaced residents understand their relocation options and rights, housing search assistance for voucher holders, and meaningful, ongoing communication with relocatees. Finally, sites are asked to connect relocatees to any CNI-funded social, economic and health services they may be entitled to, and to services in temporary relocation neighborhoods.

This suggests a fairly intensive, individualized level of contact and services. HUD explicitly acknowledges that monitoring and services will be needed over an extended period of time and, to a lesser extent, the diversity of services that relocatees may need in order to be successful. For example, tracking, case management and support services must be provided for 3 to 5 years or until replacement housing is fully occupied, depending on the service in question.

8 See 42 U.S.C. §4622; 49 C.F.R. §24.205(c)(2)(ii).

Mobility-related services for displaced tenants. For tenants relocating with Section 8 vouchers, the NOFA places a strong emphasis on housing mobility counseling and encouraging moves to lower-poverty, higher opportunity areas, but with little specific guidance on how to implement housing mobility.

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assistance, help with moving costs, and help adjusting to new communities (Cunningham & Sawyer, 2005; Briggs & Turner, 2006). But mobility services are not well defined,⁹ and few public housing authorities provide intensive services to voucher holders as part of their standard HCV programs (Cunningham et al., 2010). There are examples of intensive mobility counseling programs with promising results—notably in Baltimore (Engdahl, 2009). But housing authorities often lack the financial or technical capacity to design and administer them. This in mind, an important question is how HUD and grantees address replacement housing, relocation and neighborhood mobility services for households displaced by CNI development.

HUD provides few specific guidelines for how services for displaced CNI households should be provided. Sites are required to provide “... appropriate service coordination, supportive services, mobility counseling and housing search assistance for residents displaced as a result of revitalization of severely distressed projects” (p. 19).

Grantees must also support regional moves (throughout the MSA), and provide transportation assistance for voucher holders to visit housing in lower-poverty areas (p.97). Additional relocation assistance such as tenant-based vouchers, support services, long-term mobility counseling, moving costs and security deposits are eligible activities, but the NOFA stops short of requiring these services, or establishing how or when they should be provided.

Measuring relocation outcomes. Several CNI “priority outcomes” and associated metrics are included as factors that inform how applicants’ relocation plans are rated, and will serve as performance measures to gauge the program’s success serving baseline residents over time. Specifically, all relocatees should have informed choices about where to live, the number of interim moves should be minimal, vulnerable populations should be supported, and residents should be stably housed during relocation.

9 We have tried to provide some guidance in our new housing mobility toolkit: *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program* (PRRAC and The Urban Institute, February 2013), available at www.prrac.org/pdf/ExpandingChoice.pdf

The metrics required to demonstrate successful relocation and re-occupancy are based primarily on these “priority outcomes.” The outcome measures most relevant to neighborhood mobility are the number and share of residents who actually return to CNI sites compared to those who expressed an initial preference to return, and the share living in a “lower-poverty and higher-opportunity neighborhood than pre-transformation by household type.” (p. 96). Considering that CNI sites are selected based in part on extreme poverty rates and distress at baseline, moving to a *lower-poverty* rate area as opposed to a low-poverty or high-opportunity area again seems to be a fairly low bar.¹⁰

Vulnerable populations are broadly defined elsewhere as children and the elderly, disabled or long-term unemployed. Housing stability is measured as the number of moves between displacement and re-occupancy of CNI replacement housing, and the number of households who are evicted or involuntarily lose assisted housing during the relocation period. The specific outcomes for supporting vulnerable households focus on school quality: how many children switch to new schools, and how many attend better quality schools compared to pre-CNI. Notably, this metric does not necessarily require that children move to high-quality neighborhoods, but presumably that they enroll in new high-quality schools or remain in CNI neighborhood schools as they improve over time.

One somewhat contradictory component of the relocation and re-occupancy plan requirements is that sites are essentially asked to base services on resident preferences as identified through required surveys or resident needs assessments. However, applicants are instructed to focus the needs assessments on a table of “Health, Education, Economic Self-Sufficiency and Safety Outcomes and Metrics” that are mainly individual-level outcomes and do not directly address neighborhood characteristics or relocation outcomes (NOFA Section V.A.3.b.1., p.86). Only one required outcome measure is a neighborhood characteristic: safety from crime, as measured by Part 1 crimes and residents’ perceptions of safety.

Finally, for households that move with vouchers, sites must identify housing opportunities in neighborhoods that are not minority- or poverty-concentrated and have high-quality schools and early learning programs. (p.97.) Grantees must provide transportation assistance for voucher holders to visit housing in these neighborhoods. (Id.) Again, concentration standards for target relocation neighborhoods appear to be based primarily on the extremely high poverty and minority population threshold measures.

In sum, HUD’s requirements and priority outcomes emphasize two key components: the one-to-one hard unit replacement within the CNI target neighborhood; and residents’ right to

¹⁰ A threshold requirement for CNI eligibility is that target neighborhoods must have poverty rates of at least 20 percent, but HUD favors areas higher poverty rate areas. Proposals are awarded the maximum number of rating points (5) if target neighborhoods have poverty rates of 40% or higher at baseline, and at least one point as poverty rates increase above 25%.

return to the improved housing and neighborhoods. It is HUD's intent that baseline residents experience similar neighborhood quality and service improvements as future residents of redeveloped neighborhoods, regardless of where they move. But the implication throughout is that returning to the CNI neighborhoods will be the main way that relocatees achieve improved neighborhood quality.

IV. Implementation site replacement, re-occupancy and mobility plans

The implementation grantees have all indicated that they will build 100% of their replacement housing on the original assisted housing site or within the target neighborhood. Table 1 shows the number and distribution of replacement units, by CNI implementation site. As noted, none of the sites are eligible for a waiver to the hard unit one-for-one requirement, so all replacement housing is in the form of assisted units.

Table 1.
Preliminary CNI Implementation Grant Sites and Replacement Unit Plans

	Boston	Chicago	New Orleans	San Francisco	Seattle*
Replacement units	129	504	821	256	561
On-site (may be multiple sites)	129	210	304	256	463
Off-site, in CNI neighborhood	0	294	517	0	98
Outside CNI Neighborhood	0	0	0	0	0

Source: CNI proposals provided by sites. Information is subject to change.

*Seattle distributions are approximate, based on the pending 2012 CNI application.

Resident relocation and re-occupancy preferences. For New Orleans, San Francisco and Seattle, siting replacement units in the target neighborhoods seems to be in keeping with residents' relocation preferences. The three cities surveyed residents about their relocation preferences, and nearly all reported that they preferred to return to the target neighborhood after redevelopment.¹¹ Sample sizes varied and it is difficult to anticipate how well the pre-

11 Boston did not survey residents about relocation preferences, noting: "Because of one-to-one replacement of units within the development, there is no need to canvass residents on whether they desire to return to the development." (Boston CNI Round 2 Application, p. 38). In Chicago, residents were interviewed about their preferences as part of a Uniform Relocation Act required plan completed in 2009 but results were not included in the CNI application.

redevelopment baseline surveys will predict actual relocation or re-occupancy decisions.¹² Nevertheless, according to the implementation grant awardees, approximately 95% of respondent households in San Francisco, 90% in Seattle and 83% in New Orleans indicated a preference to return.¹³

There were some differences in preferences for interim housing during redevelopment: in Seattle, 70% of survey respondents hoped to remain in the target neighborhood in alternative public housing, and an additional 14% preferred a public housing unit outside of the neighborhood. Only 12% hoped to move with a Housing Choice Voucher. In contrast, 100% of the New Orleans sample preferred to relocate with a voucher.

Relocation housing locations. In keeping with apparent resident preferences, Boston, Chicago, San Francisco and Seattle's CNI proposals all emphasize that enough temporary relocation housing is available within the target areas for all relocatees to stay on-site or in the neighborhood during redevelopment. Two of the four cities (Seattle and San Francisco) will phase new construction so that some or all replacement units will be available before occupied units are demolished.

In San Francisco, replacement housing will be built on sites immediately adjacent to the units that will be demolished. Residents will be able to stay in their housing during construction and move directly into new replacement housing. In Seattle, 98 (of approximately 561) households will be able to move directly from housing scheduled for demolition into new replacement units in the target neighborhood.

Boston's proposal suggests that all of the current tenants of redeveloped units may need to move temporarily but relocations will be within the same assisted housing development or nearby, and should be for no longer than 12 months. Boston expects all but 49 households to move back to their original, refurbished units. The 49 households currently live in units that will not be rebuilt in order to allow for construction of larger units on-site. They will instead be offered new units elsewhere within the same development.

In Chicago, relocations began in 2009 and 29 households already moved by the time the CNI application was submitted. Chicago has enough replacement units within the CNI neighborhood for all displaced households, which will be assigned by lottery. In addition, vouchers are available for up to a third of relocatees should they choose to use them, but the

12 In Seattle, 69% of household in Seattle were surveyed, and 57% in San Francisco. In New Orleans, only 29% of households were surveyed.

13 These particular CNI neighborhoods also happen to be in highly desirable locations or facing significant gentrification pressure.

expectation is that most will choose to remain in an alternative assisted unit within the target neighborhood.

In New Orleans, 304 replacement units will be located on the same site as the demolished units, and 517 will be off-site but within the target neighborhood. A portion of the off-site units are for elderly and special needs households and will be built early in the construction process to minimize the amount of time these households are in temporary housing.

It should be noted that, with the possible exception of New Orleans, all of the implementation grant neighborhoods are in relatively tight urban housing markets. All are also located near downtown central business districts, universities, and/or other commercial centers. A goal for all five of the sites is to connect isolated CNI communities to neighboring high-opportunity neighborhoods, and to attract wealthier households with housing close to jobs in surrounding neighborhoods. This in mind, preserving low-income housing in the target neighborhoods and encouraging relocatees to remain on-site may offer the most long-term benefits to both original and future low-income residents in these cities.¹⁴ However, as discussed in detail below, with the exception of New Orleans, the grantees tend to assume that few households will use vouchers to leave the CNI neighborhoods during redevelopment, and thus may be underestimating the need for mobility services.

As discussed below, Seattle requested only 50 relocation vouchers to accommodate about 10% of displaced households, and expects the rest to remain on-site or in the target neighborhood during redevelopment. Expectations are based on the resident surveys. All displaced households will be given 18 months notice before redevelopment begins.

Relocation counseling and neighborhood mobility services. In keeping with HUD's program requirements, each of the implementation sites' relocation and re-occupancy plans propose counseling and monitoring over an extended period (at least three to five years), and pay particular attention to supporting relocatees' ability to return to CNI neighborhoods. In all but Seattle's case, sites will contract with outside entities to provide these relocation counseling and mobility services.¹⁵

For the most part, relocation plans mirror each site's assumptions about resident preferences for temporary or permanent moves. Four of the five sites assume that most residents will stay in the neighborhoods during redevelopment and/or move into permanent CNI replacement units when they are available. Each site does anticipate that some share of relocatees will use

14 This assumption may not hold true in the next round of implementation grants, particularly if more distressed neighborhoods in weak market cities are selected.

15 Preservation of Affordable Housing (POAH) and the City of Chicago have contracted with Urban Relocation Services; the City of Boston with Judy Cohn Associates; and both the San Francisco and New Orleans housing authorities have contracted with Urban Strategies.

vouchers to move, but these moves are not presented as the most common relocation scenario. Boston, Chicago, San Francisco and Seattle all emphasize that enough temporary relocation units are available for relocatees to avoid off-site moves; Seattle and San Francisco will phase new construction so that some or all replacement units will be available before demolition begins. New Orleans is the only site that explicitly anticipates that most, if not all, displaced residents will initially move out of the CNI area using tenant-based vouchers.

Not surprisingly then, New Orleans' proposed counseling and case management service plan is the most detailed of the five sites, while Boston and San Francisco's services are perhaps the least developed. Boston, San Francisco and Seattle all assume that relocations outside of the target neighborhood (including voucher relocations), will be minimal and temporary. Chicago similarly assumes that most displaced households want to remain in the CNI neighborhood during redevelopment, but requests a larger number of vouchers for relocation and pays more explicit attention to the possibility that some households will want to move to new neighborhoods with vouchers.

In New Orleans, relocation case managers will monitor households monthly and coordinate with the Housing Authority's HCV program to provide pre-move counseling, housing search assistance, and post-move monitoring. Services will also include tours of housing units and neighborhoods, and transportation to promote relocation to new neighborhoods. However, while New Orleans' service plans are fairly well developed, specific criteria for targeting voucher neighborhoods are not well defined and appear to mirror HUD's threshold minimum expectations for poverty and racial concentration. Nevertheless, New Orleans' neighborhood mobility-related plans are the most coherent of the five sites.

In contrast, San Francisco's plan expects all relocatees to remain on-site during redevelopment and return to CNI replacement housing. The plan states that "the core of the Re-occupancy Strategy is to phase demolition so that no tenant is forced to relocate off-site" during redevelopment, and that the housing authority "intends for all current residents at the site, with certain limited exceptions, to move into the newly built units" (p.37). Tenant-based vouchers and relocation counseling are available for displaced households who choose to use them. However, relocation services tend to focus on avoiding evictions or circumstances that would prevent returns to CNI housing, and downplay the difficulty that voucher relocatees may have finding housing in low-poverty neighborhoods in or outside of the city.

For example, the San Francisco proposal states that "with the exception of some neighborhoods, [San Francisco] is not minority- or poverty-concentrated, has high-quality schools and early learning programs and has an effective public transit system" and "tenants who seek to relocate to higher-income, diverse communities within the City can do so" (p.38).

Consistent with HUD's core metrics for the "people" section, the success of relocation services will be measured mainly through employment, health and education outcomes, and the share of tenants that lose assisted housing during relocation; neighborhood characteristics for voucher movers are not outcomes of interest.

Boston's mobility-related services are similarly limited, with relocation services focused on relatively brief moves within the CNI site. Boston expects all 129 displaced households to return to the site, and for interim moves to be for less than one year. A relocation consultant will "ensure that tenants' needs are accommodated throughout the construction period," which includes working with the housing developer to secure temporary off-site units, tracking relocated tenants, serving as a liaison between tenants, landlords and utility companies, and coordinating returns. The plan specifically focuses on ensuring that children do not have to change schools during relocation—either through temporary moves within the same school catchment area, or by providing transportation to allow children to remain in pre-CNI schools. The proposal states that households that choose not to return to the CNI site will be tracked for 5 years, but does not discuss any neighborhood mobility related goals, services or outcomes for these households.

Seattle's attention to neighborhood mobility for voucher movers also seems somewhat sparse. According to Seattle's 2012 CNI proposal, 50 households are expected to move with vouchers—approximately 10% of all displaced households.¹⁶ One relocation counselor will connect the voucher movers to the housing authority's HCV program for mobility services. The HCV program currently tracks neighborhood quality outcomes for voucher recipients using the Kirwan Institute's Opportunity Index, but does not provide any additional mobility counseling services. Seattle emphasizes eviction prevention and coordinated case management, and either helping voucher holders access services in new neighborhoods or providing financial assistance to return to the CNI neighborhood and take advantage of improved services.

Finally, in Chicago, voucher movers' case managers will coordinate with the Chicago Housing Authority's (CHA's) voucher program and will have access to CHA's information about housing, schools, early learning services, employment, and transportation in neighborhoods regionally. CHA is not a primary partner in the CNI grant, but will administer tenant-based relocation vouchers for displaced CNI residents. Search and move assistance will include transportation to view available units in lower-poverty, less racially segregated neighborhoods and help connecting with services in new areas. Chicago requested 143 vouchers for relocation, which would accommodate approximately 30% of the 504 displaced CNI households.

16 Of 561 units that will be redeveloped in Seattle, 507 were occupied as of 2012.

In the end, it appears that displaced households' access to improved neighborhood quality as a result of CNI investments will rely first on their ability to remain on-site or in the CNI target neighborhoods during redevelopment and permanently, and the CNI implementation grantees have not prioritized housing mobility services as required by the NOFA. As noted above, this may be related to the unique desirability of these particular sites. Using a voucher to move to a high-quality neighborhood temporarily or permanently is technically an option for relocatees, but sites may be less prepared to provide individualized, intensive services to achieve improved neighborhood outcomes. New Orleans has arguably the most developed neighborhood mobility counseling plans as of the original CNI application, in keeping with the likelihood that most if not all New Orleans relocatees will use vouchers to move off-site. However, the other four sites assume that relatively few households will use vouchers or permanently leave the target neighborhoods.

Using a voucher to move to a high-quality neighborhood temporarily or permanently is technically an option for relocatees, but sites may be less prepared to provide individualized, intensive services to achieve improved neighborhood outcomes.

V. Planning grantee replacement housing, re-occupancy and counseling plans

Since 2010, HUD has awarded 30 planning grants to sites in 22 states plus the District of Columbia. Table 2 shows the planning grant sites, and the 13 sites that responded to the on-line survey.¹⁷

Planning grantees are in the process of writing their transformation plans, and the information collected here is preliminary. For example, aspects of all 13 survey respondents' housing strategies (number of units for demolition, replacement unit locations, or expected use of vouchers) were still undecided as of mid-2012. For some sites, little detailed information is available beyond the target assisted housing developments and neighborhood.

Current occupancy rates for the distressed units were available for 20 of the 30 planning sites: at least 15 planning sites hope to redevelop occupied housing units, while at least four (Buffalo, Cincinnati, Savannah and Atlanta) propose to redevelop unoccupied units or vacant land. Of the 13 survey respondent sites, eleven will displace residents if redevelopment happens.

17 A copy of the questionnaire is included as Appendix A. Representatives all 30 sites were contacted by email and/or phone and provided and link to an on-line survey about preliminary plans for housing redevelopment, tenant relocation and mobility services. Sites had two weeks to respond to the survey request. Thirteen of the 30 sites completed the survey.

Table 2. Planning Grant Sites (2010 & 2011)

Site	Housing Development	Units for Replacement	Waiver Eligible	Survey
Albany, GA	McIntosh Homes	125	No	Yes
Atlanta, GA	University Homes (demolished)	0	Yes	
Baltimore, MD	Pedestal Gardens	203	Yes	Yes
Buffalo, NY	Commodore Perry Homes; Woodson Gardens (vacant); Kowal	354	No	
Cincinnati, OH	English Woods (vacant)	approx. 717	Yes	
Cleveland, OH	Cedar Extension	154	Yes	
Columbus, OH	Poindexter Village	414	No	
Jackson, TN	Allenton Heights	100	No	
Jersey City, NJ	Montgomery Gardens	434	No	Yes
Kansas City, MO	Choteau Courts	144	Yes	Yes
Little Rock, AR	Sunset Terrace & Elm Street	124	Yes	Yes
Memphis, TN	Foote Homes	420	No	
Meridian, MS	George M. Reese Court	97	No	
Norfolk, VA	Tidewater Park Gardens	618	Yes	Yes
Norwalk, CT	Washington Village	136	No	Yes
Opa-Locka, FL	The Gardens	328	Yes	
Philadelphia PA	Mt. Vernon Manor	125	Yes	
Providence, RI	Manton Heights	Approx. 375	No	
Rockford, IL	Fairgrounds Valley	210	No	
Sacramento, CA	Twin Rivers	218	No	Yes
Salisbury, NC	Civic Park	72	No	
San Antonio, TX	Wheatley Courts	248	No	Yes
Savannah, GA	Hitch Village; Wessels Homes (Vacant)	0	Yes	Yes
Shreveport, LA	Jackson Heights; Galilee Arms	74	No	Yes
Springfield, MA	Marble Street; Concord Heights; Hollywood I & II	132	No	
Suffolk, VA	Parker Riddick; Cypress Manor	206	No	
Tulsa, OK	Brightwaters	200	No	
Washington DC	Kenilworth Parkside & Courts	420	No	Yes
Wilmington, NC	Hillcrest	256	Yes	Yes
Wilson, NC	Whitfield Homes	311	No	

The following sites have recently received 2012 Choice Neighborhoods Planning Grants, but were not included in this review: Austin, TX, Boston, MA, Camden, NJ, Columbia, SC, Dade City, FL, Durham, NC, Honolulu, HI, Kingsport, TN, Newark, NJ, New York City, NY, Roanoke, VA, San Francisco, CA (Bridge Housing), San Francisco, CA (Sunnydale Development Co.), Spartanburg, SC, Washington, DC, Woonsocket, RI, and Yonkers, NY.

Preliminary replacement housing plans. Similar to the implementation grantees, most of the survey respondent sites (8 of 13) plan to build replacement housing entirely within the target neighborhoods. Only three respondents currently plan to build outside of the target area. The remaining two sites have not yet decided where replacement housing will be built.

About a third of all planning sites and six of the survey respondents are eligible for a waiver to the hard unit replacement requirement; three of the six (Savannah, Little Rock and Wilmington, NC) anticipate using vouchers for a portion of replacement units, and one site (Baltimore) was undecided.

Resident relocation and re-occupancy preferences. Eleven of the 13 respondents have completed assessments or are currently in the process of collecting survey data, and six had preliminary information about residents' relocation and re-occupancy preferences. Of the remaining two sites, one is developing on vacant land where units were demolished in 2010 and the other noted that a needs assessment would be done closer to the actual demolition date.

Among the six sites with preliminary estimates of residents' preferences, the shares that hoped to return to the target neighborhoods after redevelopment ranged from approximately one third to three quarters—although two grantees noted significant shares of surveyed residents wanted more information before making relocation or return decisions. Considering how early in the planning process many of the grantees are, it may be premature to assess residents' final relocation preferences. Similarly, nearly all of the 13 sites all noted that it is difficult to estimate or set goals for final re-occupancy this early in the planning process. Estimates for expected shares of baseline residents that return to the redeveloped neighborhoods ranged from 25% to 75%. Sites based their early estimates on a combination of resident preferences, and how many on-site/target neighborhood units might be available.

Use of vouchers for relocation. Eight of the 13 respondent sites anticipate that some share of displaced households will use vouchers for temporary relocations, alone or in combination with other on- or off-site hard unit relocation housing options. As with the implementation grantees, two sites noted they would like to avoid temporary moves entirely and offer residents the option to move into permanent replacement housing before demolition begins. The two sites also acknowledged that they may not be able to accommodate all of the relocatees who might prefer to move directly into permanent housing.

Relocation counseling and neighborhood mobility services. All of the planning sites indicated they would provide mobility counseling services and most (10) were able to provide a sense of the types of services they may provide, although the definitions of mobility counseling

were not necessarily detailed or robust (see Table 3). Nine of the sites indicated that they already provided some type of mobility-related support to voucher holders who were displaced from HOPE VI or other public housing redevelopment projects, or as part of their standard HCV program services.

Table 3. Planning Grantee Preliminary Mobility Counseling Services

Mobility Counseling Services (N=13)	% of sites	No. of sites
Case management for displaced families	69%	9
List of units that may be available for HCV holders	69%	9
Help with search costs (application fees, transportation to units)	62%	8
Access to computers for on-line searches	54%	7
Individualized search assistance	54%	7
Help with deposit costs	54%	7
Post-move counseling for relocated households	39%	5
Help with credit or other financial planning	39%	5
Information about neighborhood characteristics	31%	4
Maps of high-opportunity neighborhoods	23%	3
Targeted landlord recruitment	23%	3
N/A (we have not yet determined which services we will provide)	23%	3
Second-move counseling	15%	2
Higher payment standards in opportunity areas	8%	1
Financial incentives for landlords	0%	0

The most common services the sites anticipate providing are case management (which is required for CNI implementation grantees), lists of available units that accept vouchers, and help with search costs. None of the respondents anticipated providing financial incentives to landlords in high-opportunity areas, and only one anticipated providing higher payment standards for moves to high-opportunity areas. The sites were evenly split between planning to provide services internally versus enlisting an external provider.

VI. Conclusion and Recommendations

This report started with the question of how HUD and the first two rounds of CNI awardees approach relocation and neighborhood mobility for households displaced by development. Notably, CNI and grantees incorporate lessons from HOPE VI and other relocation programs about the challenges displaced households often face: there will be no loss of hard units from CNI redevelopment; there are clear parameters around replacing units with tenant-based vouchers; sites must closely monitor displaced households over time; and residents must be included in the redevelopment process from the early planning stages and throughout implementation. Specific attention is also paid to monitoring and supporting the most vulnerable households.

In general, CNI focuses on housing and neighborhood stability—remaining in, or returning to the target areas—as displaced households’ most promising path to improved neighborhood quality. CNI is first and foremost a neighborhood improvement program, with the expectation that target neighborhoods will offer better quality of life than other areas where low-income renters might live. The possibility of reaching better neighborhoods through off-site replacement housing in high-quality neighborhoods or mobility-enhanced voucher moves is treated as secondary. For the most part, the implementation grantees follow HUD’s lead in their approach to replacement housing and relocation decisions.

If CNI neighborhoods are transformed over time into thriving mixed-income areas with access to jobs, services and high-quality schools, it may in fact be in many displaced families’ best interests to stay in their neighborhoods or return after development.

But not all residents will choose to stay, and it remains to be seen whether all of these ambitious development plans will be successful. In the meantime, by focusing mainly on long-term neighborhood transformation expectations, CNI misses opportunities to encourage neighborhood mobility for “baseline” residents of CNI assisted housing.

The need for broader housing options during the

redevelopment period: It is not clear that CNI target neighborhoods will offer improved neighborhood quality for displaced households during prolonged redevelopment periods. Even assuming CNI target neighborhoods evolve into high-opportunity areas over time, it will likely be years before development is complete and service and education investments are in place. For some households, interim relocations or replacement

If CNI neighborhoods are transformed over time into thriving mixed-income areas with access to jobs, services and high-quality schools, it may in fact be in many displaced families’ best interests to stay in their neighborhoods or return after development. But not all residents will choose to stay....

housing in alternative high-quality neighborhoods may be a more promising opportunity to improve quality of life than remaining on-site or in CNI neighborhoods during redevelopment.

The need for housing mobility counseling for all displaced residents: Considering previous experiences with public housing relocations and the complexities of the CNI program, it seems ambitious to assume that all, or even most displaced households will actually return to

More explicit and meaningful attention to mobility counseling is needed to encourage grantees to offer intensive services. The NOFA should include specific expectations for counseling services—a standard set of more “passive” services that should be provided by case managers, for example—and offer incentives for applicants to provide more individualized and intensive services.

the original sites or neighborhoods. In the end, more CNI households may choose to move with vouchers than current grantees anticipate, and these families also need services and support. HUD does recognize the potential need for a diverse array of mobility counseling by identifying a number of services as eligible activities in the 2012 implementation NOFA. But the experience with the current implementation sites is not encouraging. More explicit and meaningful attention to mobility counseling is needed to encourage grantees to offer intensive services. The NOFA should include specific expectations for counseling services—a standard set of more “passive” services that should be provided by case managers, for example—and offer incentives for applicants to provide more individualized and intensive services. For example, HUD can encourage sites to recruit landlords or offer higher payment standards in high-opportunity areas, to offer voucher movers tours of high-quality schools and neighborhoods, and to have case managers accompany voucher holders when they visit units or meet with landlords.

Few PHAs provide individualized or intensive mobility counseling to their standard HCV program participants, and voucher programs may struggle with how to design services or monitor outcomes effectively. Ongoing technical and financial support for current and future CNI grantees would be useful to help them design, implement and monitor their mobility services. Similarly, despite the research attention paid to voucher holder and public housing relocatees’ neighborhood location outcomes, mobility counseling remains an under-researched area with few evidence-based service models or best practices for practitioners to adopt. CNI is an opportunity to test different approaches to mobility counseling services, in very different local market contexts.

Off-site replacement housing resources: The Choice Neighborhoods NOFA recognizes the importance of placing off-site replacement housing in higher-opportunity communities and provides basic threshold criteria for off-site locations. But the NOFA does not require any specific mix of replacement housing to be located on the site, inside the neighborhood, or outside the neighborhood. The initial round of Choice Neighborhoods implementation

grantees have largely ignored the off-site, out of neighborhood replacement housing option. As noted above, in a neighborhood where significant gentrification is already underway, this approach may be a good one. But not all Choice Neighborhoods sites will be in gentrifying neighborhoods. HUD should consider identifying with more precision the conditions and jurisdictions where applicants should be required to site a portion of replacement housing outside CNI neighborhoods.

We recognize that the recommendations in this report may be too late for some of the current Choice Neighborhoods “implementation grant” sites, but we hope that HUD will more strongly enforce its own guidelines for the program, and provide training and further clarify these civil rights program requirements for the current Choice Neighborhoods planning grantees and in the next round of implementation grants.

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Appendix A

PRRAC Choice Neighborhoods Planning Grant Survey

Thank you for taking the time to fill out this brief survey about your Choice Neighborhoods planning grant. It should take no more than 10 or 15 minutes and focuses on the replacement housing, relocation and mobility counseling components of your CNI plans. We understand that some responses may be very preliminary for your site.

Your answers will help the Poverty & Race Research Action Council understand CNI grantees' plans for relocation assistance, and prepare for an upcoming webinar for planning grantees. The Urban Institute and PRRAC are also currently developing a "toolkit" for organizations interested in launching mobility-related services or counseling programs.

Multiple people from each site may complete the survey. Please forward this link to additional CNI project staff as necessary. Responses will be collected until Friday, July 20th.

Thank you in advance for your time.

Please contact Martha Galvez, a consultant for PRRAC on this project, with any questions.

Martha Galvez
718.757.8171
mmgalvez@uw.edu

1. Please provide your contact information and identify your planning grant site

Name:

Title:

Organization:

City/Town:

Email:

Phone:

Name of Target

Housing

Development:

Name of Target

Neighborhood:

Describe your role in
the CNI planning
process:

2. Please provide information about replacement housing plans for your CNI site. We understand that answers may be preliminary at this point in the planning process.

How many units will be
demolished/refurbished?

How many of these units are currently occupied?

How many of these units will be replaced using portable Housing Choice Vouchers?

How many of these units will be replaced with hard units?

How many replacement units will be located on-site?

How many replacement units will be located off-site but within the target neighborhood?

How many replacement units will be located outside of the target neighborhood?

3. Has your site done a resident needs assessment to identify preferences for relocation and re-occupancy?

- A needs assessment is in progress.
- We do not plan to do a needs assessment.
- N/A (units to be redeveloped are vacant or previously demolished).

If yes, please indicate the share of surveyed residents that expressed a preference to return to the site.

4. Please describe your current expectations for tenant relocation during the demolition and redevelopment process. Please use the space provided to elaborate on your answer if necessary.

Most residents will move directly into new replacement housing.

- Most residents will relocate using tenant-based vouchers.
- N/A (units are vacant, no residents will be displaced by development).

Other (please specify)

5. Please describe your expectations for resident returns to the site or neighborhood once redevelopment is complete. If possible, identify the approximate number or percent of "baseline" residents that you expect to return to the CNI neighborhood once development is complete.

6. Does the PHA already provide mobility counseling or move assistance to any HCV program participants or public housing relocatees?

- Yes
- No

If yes, please specify the population served by mobility services (i.e., all HCV recipients, HOPE VI relocatees, etc.)

7. Please describe your current plans for providing mobility counseling or support services.

- Internally (i.e., through the HCV program or other PHA staff)
- Externally (i.e., through a contract with a non- or for-profit service provider)
- We have not yet determined how we will provide services

Other (please specify)

8. Please describe any relocation services or supports your site is considering. Check all that apply.

Case management for displaced families

- Access to computers for on-line searches
- List of units that may be available
- Maps of high-opportunity neighborhoods
- Information about neighborhood characteristics
- Individualized search assistance
- Help with search costs (application fees, transportation to units)
- Help with deposit costs
- Higher payment standards in opportunity areas
- Targeted landlord recruitment
- Financial incentives for landlords
- Post-move counseling for relocated households
- Second-move counseling
- Help with credit or other financial planning
- N/A (we have not yet determined which relocation services we will provide)

Other (please specify)

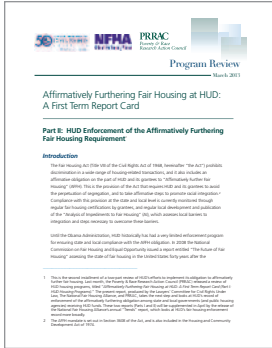
9. Please use the space below to describe any questions or challenges your site has encountered with regard to planning for relocation and mobility counseling services, or specific topics you would like discussed in a webinar for planning grantees.

Thank you for completing the survey. Please feel free to contact Martha Galvez with any questions.

Martha Galvez
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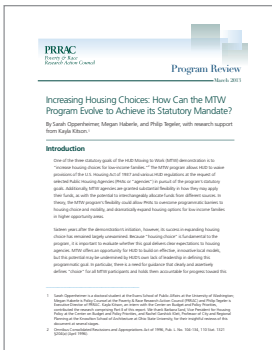


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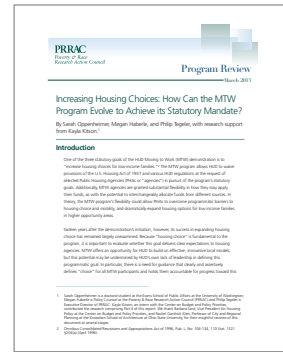
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