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RE: CMHA's proposed RAD

FROM: John Schrider

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A preliminary review of CMHA's documents for RAD conversion shows the following issues for residents. This list of issues is preliminary only, and other issues will be identified.

1. Residents' rights to have resident councils recognized by CMHA must be made clear and binding on CMHA. HUD's rules on resident councils in 24 CFR 964 does not automatically apply to a RAD building. CMHA says the much weaker protections of 24 CFR 247 would apply. CMHA can and should agree to 24 CFR 964 rules applying to RAD developments.
2. Residents' grievance rights should not be taken away. CMHA says 24 CFR 966 which has the Public Housing Grievance process, would not apply to a RAD building. The much weaker protections stated in the HUD notice would apply. CMHA can and should agree to 24 CFR 966 applying regarding grievances.
3. Rents should not increase. CMHA says the earned income disregard would not apply to new residents of RAD buildings. This is one example of problems with CMHA's proposal related to rent. There are likely others.
4. Relocation rights must be more specific. Though CMHA says there will be a right to return, CMHA's relocation policy for public housing would not apply unless CMHA agrees to do that. Residents' specific rights must be spelled out.
5. Rights to information must be specific. RAD buildings are not owned by public housing authorities. That means laws about access to public information will not apply unless CMHA agrees in writing. Residents must continue to have the same rights to review and comment on proposed policies that they have as public housing residents.

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