

# Community Development Block Grant Disaster Recovery (CDBG-DR )

The Consolidated Notice  
*URA, 104(d) and CDBG  
related requirements*



2022 CDBG-DR Consolidated Notice Training Series



# Relocation & Real Estate Division

## *Presenters*

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**Sara Hernandez**  
Deputy Director

**Bryan O'Neill**  
Senior Relocation Specialist

**Cari Palerm**  
Regional Relocation Specialist

**Tynan Stevenson**  
Relocation Specialist



# Objectives and Agenda

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**Objective:** Improve understanding of URA and 104(d) waivers/alternative requirements for 2020 CDBG-DR grantees.

**Agenda:**

- ✓ RRED Division and URA & 104(d)
- ✓ Action Plan Minimize Displacement Efforts Requirement
- ✓ New 104(d) waivers and alternative requirements
  - *RARAP for DR*
  - *One-for-one replacement*
- ✓ Other waivers and alternative requirements
- ✓ Identify additional training and resources
- ✓ Question & Answer



# Relocation and Real Estate Division

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- \* Develop national policies for real estate acquisition, rehabilitation, demolition and displacement activities in connection with HUD programs consistent with our Delegation of Authority.
- \* Provide guidance & technical support to HUD program offices, including DRSI.
- \* Provide technical assistance, training, and monitoring to CPD grantees.
- \* Provide referrals to citizens/receive inquiries & complaints.





# RRED Staff



OAHP / Relocation and Real Estate Division

## Regional Relocation Specialists

I - Nancy Johnson

II - Emie Eshmawy

III - Mike Szupper

IV - Regina Montgomery  
IV - Cari Palerm (PR,VI) \*

V - Maureen Thurman

VI - Ursula McLendon

VII - Natalie Simms -Patton

VIII - Jade Santoro

IX - Jay Smith \*

X - Lori Martin



## HQ RRED Staff

Will Rudy – Director

Sara Hernandez – Deputy Director

Bryan O’Neill – Senior Relocation Specialist\*

Cari Palerm – Regional Relocation Specialist\*

Latosha Pierce- Relocation Specialist\*

Tynan Stevenson – Relocation Specialist\*

\* DR Policy Team



# What is the URA?

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- Acronym for a federal law: Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. URA regulations: 49 CFR part 24
  - Applies to acquisition, rehabilitation, and demolition for federally-funded projects
  - Establishes minimum federal requirements for property acquisition and relocation of people & businesses
  - Key objective: ensure that people whose real property is acquired, or who move as a direct result of projects receiving Federal funds, are treated fairly and equitably and receive assistance in moving from the property they occupy.
- \* Consolidated Notice modifies some URA requirements by providing waivers and alternative requirements.



# What is Section 104(d)?



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Section 104(d) refers to a section of a Federal law called the "Housing and Community Development Act of 1974," as amended. Section 104(d) regulations: 24 CFR part 42

Section 104(d) applies to the demolition or conversion of lower-income dwelling units in connection with a CDBG assisted activity.

Section 104(d) Key Objectives:

- Minimize displacement,
- Provide relocation assistance to displaced lower-income persons,
- Replace lower-income housing demolished or converted. Section 104(d)

**\* Consolidated Notice modifies these requirements by providing waivers and alternative requirements.**



# CDBG program displacement, relocation, acquisition and acquisition and replacement of housing requirements

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- Pursuant to CDBG regulations at 24 CFR 570.606, CDBG grantees must follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended and comply with section 104(d).
  - This section of the regulations provides for a general policy for minimizing displacement and RARAP, relocation assistance for displaced persons, definition of “displaced person”, Initiation of Negotiations’ definition, and appeals, among other related provisions.
  - Optional relocation programmatic provisions are included in 24 CFR 570.606(d).
- \* The Consolidated Notice also modifies some of these programmatic requirements.





# Consolidated Notice Overview – URA/104(d) considerations

## I. Waivers and Alternative Requirements

## II. Eligible Activities

- A. Clarification of Disaster-related Activities
- B. Housing and Related Floodplain Issues
- C. Infrastructure (Public Facilities, Public Improvements)
- D. Economic Revitalization

## III. Grant Administration

- A. Pre-award Evaluation of Management and Oversight of Funds
- B. Administration, Planning, and Financial Management
- C. Action Plan for Disaster Recovery Waiver and Alternative Requirement
- D. Citizen Participation Requirements
- E. Program Income
- F. Other General Waivers and Alternative Requirements
- G. Ineligible Activities in CDBG-DR

## IV. Other Program Requirements

- A. Duplication of Benefits
- B. Procurement
- C. Use of the “Upper Quartile” or “Exception Criteria”
- D. Environmental Requirements
- E. Flood Insurance Requirements
- F. URA, Section 104(d) and related CDBG Program Requirements

## V. Performance Reviews

- A. Timely distribution and expenditure of funds
- B. HUD’s Review of Continuing Capacity
- C. Grantee Reporting Requirements in the DRGR system





# Action Plan

Minimize Displacement (*CN section III.C.1.f.*)

# III.C. Action Plan for Disaster Recovery Waiver and Alternative Requirement

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## Minimize Displacement: *(CN section III.C.1.f.)*

**Description** must include how Grantee plans to:

1. minimize displacement of persons and entities
2. assist any persons or entities displaced
3. ensure accessibility needs of displaced persons with disabilities, and
4. how it will plan and budget for relocation activities.

Grantees must indicate whether they will be amending an existing RARAP or creating a new RARAP specific to CDBG-DR.



# Plans to minimize displacement

- Outline some of the **steps** that can be taken locally across planned disaster recovery programs to minimize displacement of persons, businesses and farms.
- Critical when designing housing and infrastructure programs.
- Evaluate options to minimize displacement for each program that will potentially involve displacement.
- Cover any actions necessary to ensure compliance in the RARAP.

## Example:

Cost- efficient, feasible and reasonable mitigation measures will be considered before acquisition/demolition of residential units and permanent displacement of participants. Lo





# Plans to assist displaced people

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When planning to assist persons displaced, Grantees should consider potential displacement triggers under the proposed disaster recovery program, then identify the assistance that must be provided in compliance with URA, section 104(d), and programmatic tenant protections (24 CFR 570.606), as modified by the Consolidated Notice.

- Any person who moves from the real property or moves his or her personal property from the real property as a direct result of acquisition, rehabilitation or demolition for a federally assisted project may be considered a **displaced person**. A “person” can be an individual, family, business, farm or non-profit.
- Any residential occupant who qualifies as a displaced person is entitled to *notifications, advisory services, payment for moving and related expenses and to an offer of comparable replacement housing*.

Resource: URA the HUD Way Module 5: Residential Relocation and Module 6 for Non-Residential Relocation



# Ensure accessibility needs

Grantee must incorporate planning steps to ensure that no displaced person with disabilities is excluded, denied benefits, or be subjected to discrimination in the provision of relocation assistance because of the person's disability.

Such steps may include:

- Determination of accessible features of displacement housing as well as any other accessible housing needs.
- Effective communications (translation/interpretation/assistance as needed)
- Reasonable accommodations (e.g., providing transportation assistance to locate comparable housing)
- DSS replacement units (free of barriers)





# Planning and Budgeting

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Grantees must plan federally assisted DR programs or projects in such a manner that they:

- ✓ Recognize the problems associated with the displacement of individuals and families, and
- ✓ Develop solutions to minimize the adverse impacts of displacement.

Plan and budget sufficient funds to comply with applicable laws and regulations.

- ✓ Hiring relocation/ acquisition staff
- ✓ Staff Training
- ✓ Developing URA & 104(d) related policies and procedures
- ✓ Administrative and implementation cost



# URA and 104(d) Waivers and Alternative Requirements







# RARAP for DR (CN section IV. F. 7.)



# RARAP contents

## 24 CFR 42.325 (b)

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- (1) The plan shall indicate the steps that will be taken consistent with other goals and objectives of the program to minimize the displacement of families and individuals from their homes and neighborhoods as a result of any assisted activities.
- (2) The plan shall provide for relocation assistance in accordance with § 42.350.
- (3) The plan shall provide one-for-one replacement units to the extent required by § 42.375.

Consolidated Notice modifies some of these requirements by providing waivers and alternative requirements.



# New RARAP Alternative Requirement (CN section IV. F. 7.)

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Grantees who are following an existing RARAP for CDBG purposes must either:

- Amend their existing RARAP; or create a separate RARAP for CDBG–DR purposes, to reflect applicable waivers and alternative requirements.

Grantees who do not have an existing RARAP in place because they do not manage CDBG programs must create a separate RARAP for CDBG–DR purposes.

**Grantees should state which option they are pursuing in their action plan**



# New RARAP requirements for CDBG-DR

**In addition to the RARAP requirements (as modified by the Consolidated Notice), the Grantee must describe how it will:**

- 1) **Minimize displacement** of people from homes and neighborhoods as a result of assisted activities where displacement can be prevented (similar to regular RARAP).
- 2) **Minimize adverse impacts of displacement** where minimizing displacement is not reasonable, feasible or cost efficient and would not help prevent future or repetitive loss.  
**NEW:** Descriptions shall focus on programs/activities that may result in displacement and the relocation assistance that will be provided to those displaced (including URA, 104(d), optional relocation assistance, as well as any other assistance authorized by the Notice such as safe housing incentives)
- 3) **NEW:** plan programs/projects recognizing challenges experienced by displaced persons.
- 4) **NEW:** develop solutions to minimize displacement or the **adverse impacts of displacement especially among vulnerable populations.**

**NEW:** These descriptions must be scoped to the complexity and nature of the anticipated displacing activities, including the **evaluation of the grantee's available resources to carry out timely and orderly relocations** in compliance with all applicable relocation requirements.





# CDBG-DR RARAP Implementation

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## Steps to minimize displacement (methodology example)

### Suggested methodology to identify steps:

**Identify DR Program:** Homebuyer assistance program requires the acquisition of replacement properties to relocate owner-occupants with disaster-damaged properties that can't be rehabilitated in place.

**Identify potential displacement trigger:** If tenants are in occupancy of these replacement units, they may be considered displaced under the URA (49 CFR 24.2(9)(i)).

**Minimize risk of displacement step to be included in the RARAP:** To minimize the potential risk of tenant displacement, only vacant or owner-occupied replacement units will be considered to purchase by the Homebuyer Assistance Program.



# Minimizing Displacement – Examples

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- **Rental Housing Rehabilitation Programs:** Tenants are temporarily relocated for less than 12 months, receive advisory services, and are reimbursed for moving and increased housing costs to prevent permanent displacement.
- **MFH Rehabilitation Programs:** Construction in stages to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- **Single Family Housing:** When feasible, reasonable, cost-efficient, and safe for the residents, give priority to rehabilitation of housing by incorporating mitigation measures such as elevation, flood proofing or “hardening” of units, as opposed to demolition, to avoid displacement and loss of affordable units.
- **Infrastructure:** Plan and design projects to prevent displacement by looking for alternative but cost-efficient paths/location.



# When Displacement Can't Be Prevented

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- **Infrastructure projects**
- **Buyouts**
- **Other** real property acquisition programs/projects where minimizing displacement is not feasible, reasonable or cost-efficient and would not help prevent future/repetitive loss.



# Minimizing Adverse Effects of Displacement

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Grantee must describe how it will minimize the adverse impacts of displacement across disaster recovery activities when **minimizing displacement is not reasonable, feasible or cost efficient and would not help prevent future or repetitive loss**. For example, if the grantee will buyout properties in an established designated Disaster Risk Reduction Area according to the Consolidated Notice established criteria.

Grantee will minimize adverse impacts of displacement by providing relocation assistance pursuant to the URA, 104(d), CDBG relocation protections (570.606) and any other assistance that is available to a displaced person, such as safe housing incentives as described by the Consolidated Notice.



# Minimizing Adverse Impacts of Displacement - Examples

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- ✓ Promote coordination and cooperation among government agencies, neighborhood groups and affected parties to inform displaced persons of available assistance and resources.
- ✓ Early consultation with persons to be displaced.
- ✓ Early identification of comparable available replacement housing during project planning.
- ✓ Focused relocation advisory services
- ✓ Prompt / timely relocation assistance and payments (advanced, if necessary)
- ✓ Use of Housing of Last Resort



# Planning for challenges experienced by displaced persons.

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Grantee will meet this alternative requirement by describing the **planning process and the resources available** to implement their programs **focusing on challenges experienced by displaced persons**, addressing the special needs of vulnerable populations. **Examples:**

- Incorporate on policies and procedures all administrative, acquisition and relocation actions that must be followed to carry out URA/104(d) acquisition and relocation responsibilities while addressing challenges displaced persons may face (especial attention to vulnerable populations).
- When multiple Federal disaster recovery agencies or DR/MIT programs are working in the same area or community, all relocation activities will be coordinated with project work and other displacement causing activities to ensure that persons displaced receive consistent treatment and the duplication of functions is minimized.
- If eligible, displaced persons will be referred to other available disaster recovery programs such as rental housing or homebuyer assistance programs.
- Identify in advance and “designate” temporary housing, including hotels and motels and/or other temporary accommodations.
- In anticipation to large projects, coordination in advance with moving companies and related services.





# Vulnerable Populations

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- Vulnerable populations (as defined in section III.C.1.d Fair housing, civil rights data, and advancing equity): *group or community whose circumstances present barriers to obtaining or understanding information or accessing resources. Grantees should identify those populations (i.e., which protected class, vulnerable population, and historically underserved groups were considered) and how those groups can be expected to benefit from the activities set up in the plan (including RARAP requirements).*
- Identifying resources needed to address relocation impacts on minorities, the elderly, large families and persons with disabilities.
- Describing the assistance to displaced persons with disabilities to ensure they can relocate to housing that meets their sensory, mental, mobility, emotional and/or other disability-related accessibility needs.



# Vulnerable Populations (Cont.)

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- Access to required supportive services, such as public transport, specialized public schools, etc.
- Communications with persons with sensory, cognitive and developmental disabilities is accessible but also as equally effective as communication with nondisabled persons. (FHEO requirement 24 CFR Part 8, 24 CFR Part 100 and 28 CFR Part 35)
- Reasonable accommodation requirements of a displaced person with a disability at the replacement dwelling unit can be found at 49 CFR 24.2(a)(8) and Appendix A 24.2(a)(8)(vii).



# 104(d) One-for-One Replacement (Limited Waiver) RARAP for DR content

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Grantee can amend their existing RARAP or create a separate RARAP for CDBG–DR purposes, to reflect the one-for-one replacement requirement, as modified by the applicable Consolidated Notice waiver / alternative requirements.

*Previous Notice:* limited one-for-one replacement requirement waiver for disaster-damaged lower-income dwelling units demolished or converted for another use, that met Grantee’s definition of “not-suitable for rehabilitation”, **regardless of occupancy**. Under the Consolidated Notice: waiver covers disaster-damaged **owner-occupied** lower-income dwelling units demolished or converted that meet definition of “not suitable for rehabilitation”.

**A one-for-one replacement plan will be submitted to HUD, and updated or supplemented, before implementing any activity that will directly result in demolition or conversion of units not covered by the waiver.**



# Section 104(d) One-for-One Replacement (IV.F.1)



## Limited Waiver



# 104(d) - Key Definitions

A dwelling unit with a:  
Market rent + utility costs  $\leq$   
HUD Fair Market Rent (FMR)

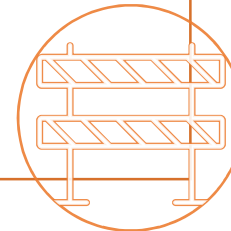
- [HUD FMRs](#)

**LOWER INCOME  
DWELLING UNIT**



Tearing down or razing, in whole or part, residential structures. Note: The reconfiguration of the interior space of buildings by moving or removing interior walls (e.g., altering two 1-bedroom units to create one 2-bedroom unit, or a 3-bedroom unit altered to create a 2-bedroom unit) within the exterior walls of a building or structure is not generally considered “demolition”

**DEMOLITION**



Conversion means altering a lower-income dwelling unit so that it is:

- Used for non-housing purposes;
- Used for housing purposes, but rents above Fair Market Rents; or
- Used as an emergency shelter.
- (see 24 CFR 42.305 for full definition)

**CONVERSION**



# New: One-for-One Replacement Waiver (CN Section IV.F.1)

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*Section 104(d) One for one replacement of lower-income dwelling units  
(24 CFR 42.375)*

- waived for **owner-occupied** lower-income dwelling units that are damaged by the disaster and not suitable for rehabilitation.

Grantees are reminded that tenant-occupied and vacant occupiable lower-income dwelling units demolished or converted to another use other than lower-income housing in connection with a CDBG-DR assisted activity are generally subject to one-for-one replacement requirements at 24 CFR 42.375 and that these provisions are not waived.





# One-for-One Replacement Waiver Requirement

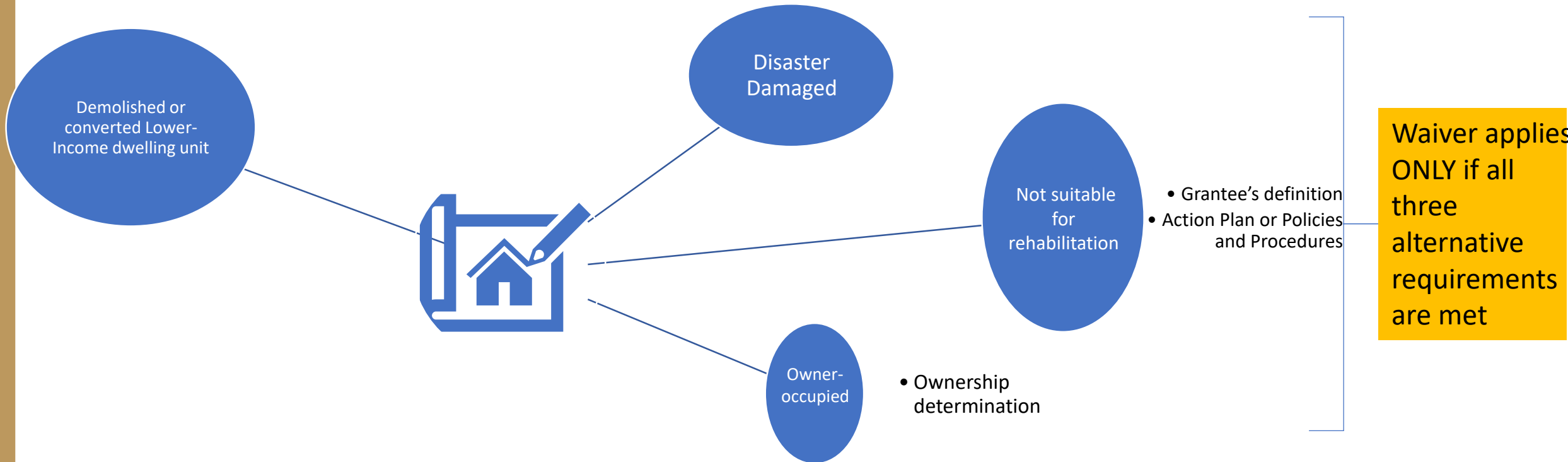
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Prior to the implementation of this waiver and alternative requirement, grantees must reassess post-disaster population and housing needs to determine the appropriate type and amount of lower-income dwelling units (both rental and owner-occupied units) to rehabilitate and/or reconstruct.

Grantees must include this analysis in their program files with a description of how DR funds will be used to address housing needs for residents of lower-income dwelling units.



# Limited 104(d) One-For-One Replacement Waiver Applicability



# Demolished or Converted Lower-Income Units Not Meeting Alternative Requirements = No Waiver

Vacant Occupiable\*

Tenant-Occupied

\* A vacant unit in **standard condition** or **substandard condition and suitable for rehabilitation** or a unit in **any condition** occupied (except by a squatter) any time within the period beginning 3 months before the date of execution of agreement covering the rehabilitation or demolition

State or local law determines lawful occupancy.

Might not require a formal lease agreement.

24 CFR 42.375 applies



# Reminder

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Each tenant-occupied occupied and vacant occupiable lower-income dwelling unit, demolished or converted must be replaced on a one-for-one basis. Also subject to public information and administrative requirements of 24 CFR 42.375.

**Note:** Demolition and/or disposition of public housing units continue to be subject to section 18 of the United States Housing Act of 1937, as amended, and 24 CFR part 970



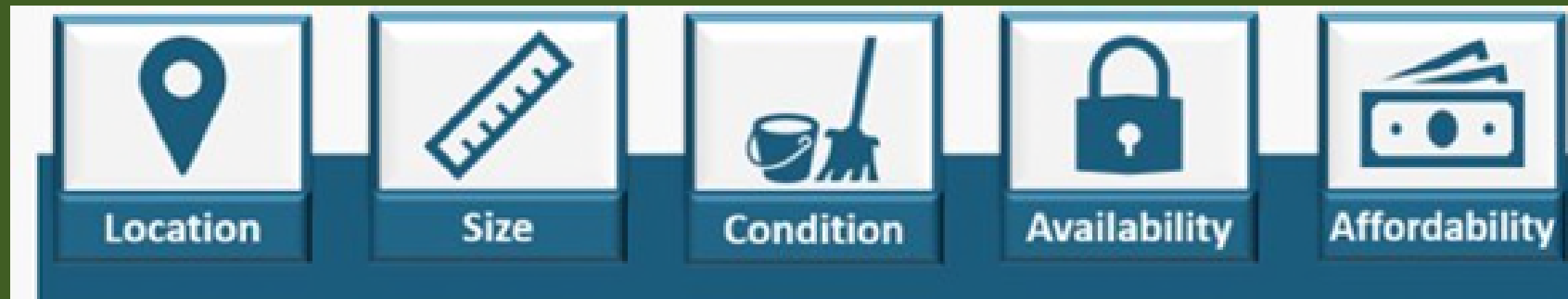
# One-for-One Replacement Plan (24 CFR 42.375(c))

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- Content:
  - Description of demolition and conversion activities
  - Size and location of demolished/converted and replacement units
  - Basis to conclude replacement units will remain affordable for at least 10 years
- Must be made Public
- Must be submitted to HUD before implementation of demolition/conversion activities



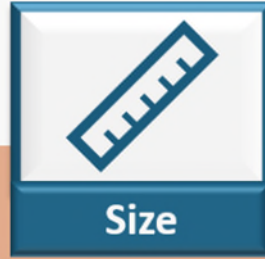
# Replacement Unit Requirements





# Location (24 CFR 42.375 (b)(1))

**Recommendation:**  
Replacement units should be located as close as reasonably possible to the community which incurred the loss of lower-income dwellings that is outside an area of known or predictable disaster risk or damage to life and property, such as floodways, floodplains, or other Disaster Risk Reduction Areas, unless those risks can be significantly mitigated.



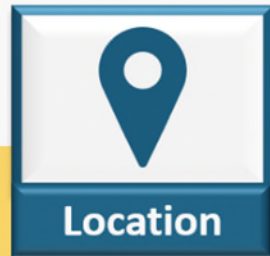
## Replacement Unit Location (24 CFR 42.375)(b)(1))

Units must be located within the **recipient's** jurisdiction and, if possible, in the same neighborhood as the demolished/converted units.

**Note:** *The term recipient means CDBG grantee or HOME participating jurisdiction.*



# Size (24 CFR 42.375 (b)(2))



## Replacement Unit Size (24 CFR 42.375(b)(2))

Units must be of a number and size to house no fewer occupants than could have been housed in the removed units according to local occupancy codes.

Removed units may not be replaced with smaller units unless the change is consistent with the housing and homeless needs in the jurisdiction. (See 24 CFR 42.375(c)(7) for additional details.)



# Condition (24 CFR 42.375 (b)(3))



## Replacement Unit Condition (24 CFR 42.375(b)(3))

Units must be in **standard condition**\*. Replacement units may include substandard units raised to standard condition if:

- No person was displaced from the unit; and
- The unit was vacant for **at least 3 months** prior to any agreement between the recipient and the property owner.

\*As defined in the recipient's Consolidated Plan.



# Replacement Unit Availability (24 CFR 42.375 (b)(4))



## Replacement Unit Availability (24 CFR 42.375(b)(4))

Units must be made available for initial occupancy during a period beginning **one year before** the public is informed of the proposed replacement units and ending **three years after** the commencement of the demolition or rehabilitation related to conversion.





# Replacement Unit Affordability (24 CFR 42.375 (b)(5))



## Replacement Unit Affordability (24 CFR 42.375(b)(5))

Units must be designed to remain affordable for at least **10 years** from the date of initial occupancy.

Replacement units may include, but are not limited to, public housing, units receiving project-based Section 8 assistance, and low-income housing tax credit units.



# Who's Responsible for Replacement?

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Replacement lower-income dwelling units may be provided by any government agency or private developer.

- *Examples:* Federally, State and/or local government, and/or privately funded affordable housing projects.

**The CDBG-DR grantee funding the project is responsible for ensuring the one-for-one replacement requirements are met.**





Replacement is not required when HUD determines, based on objective data, that there is an adequate supply of vacant, lower-income dwelling units in standard condition available within the area on a nondiscriminatory basis.



Exception to One-for-One Replacement  
(42.375(d))



# Additional Waivers & Alternative Requirements

## IV.F. URA, Section 104(d), and Related CDBG Program Requirements.

- ❖ **IV.F.2. *Section 104(d) relocation assistance.***
- ❖ **IV.F.3. *URA replacement housing payments for tenants.***
- ❖ **IV.F.4. *URA voluntary acquisition – homebuyer primary residence purchase.***
- ❖ **IV.F.5. *CDBG displacement, relocation, acquisition, and replacement housing program regulations - Optional relocation assistance.***
- ❖ **IV.F.6. *Waiver of Section 414 of the Stafford Act.***



## IV.F.2. *Section 104(d) relocation assistance.*

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- Section 104(d) eligible displaced persons may choose either URA or section 104(d) relocation assistance.
- This waiver does not impact a person's eligibility as a displaced person under section 104(d).
- This waiver merely eliminates the persons' choice and limits the relocation assistance provided to the amounts and types of assistance under the URA (*as modified by the waivers and alternative requirements in the Consolidated Notice*).
- Without this waiver, disparities exist in relocation assistance associated with activities typically funded by HUD and FEMA (e.g., buyouts and relocation).



# Who's Eligible for 104(d) Relocation Assistance?

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- Lower-income persons displaced as a direct result of the demolition or conversion of lower-income dwelling units, *in connection with* a CDBG or HOME assisted activity.
- HUD policy extends relocation eligibility to lower-income persons displaced as a direct result of the demolition of any dwelling unit, *in connection with* a CDBG or HOME assisted activity.
- HUD policy limits relocation eligibility to only lower-income residential tenants.



# URA/104(d) Relocation Assistance Comparison

## Differences waived - limited to URA assistance

### URA Relocation Assistance

- **Advisory Services**
- **Moving Expenses**
- **Security Deposits and Credit Checks - only nonrefundable security deposits.**
- **Replacement Housing Assistance –**
  - 42 months Rental Assistance, or
  - Downpayment Assistance

### 104(d) Relocation Assistance

- **Advisory services** – Same as URA
- **Moving Expenses** – Same as URA
- **Security Deposits and Credit Checks - refundable and nonrefundable security deposits.**
- **Replacement Housing Assistance –**
  - Calculated differently
  - 60 months Rental Assistance, or
  - Purchase Assistance for an interest in a Housing Cooperative or Mutual Housing Association



## IV.F.3 *URA Replacement Housing Payments for Tenants.*

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- This waiver permits grantees to pay all or part of displaced tenants' replacement housing benefits using other tenant based rental subsidies (i.e., housing choice vouchers).
- Comparable housing must be available via the rental subsidy per 49 CFR 24.204(a).
- The tenant must be eligible to participate in the subsidy program.
- The tenant must be willing to participate in the subsidy program.
- The period of authorized assistance must be at least 42 months.





## IV.F.4. *URA voluntary acquisition – homebuyer primary residence purchase.*

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- Formerly known as Arm's Length Acquisition.
- This waiver eliminates notification requirements at 49 CFR 24.101(b)(2)(i) and (ii) for acquisitions undertaken by a homebuyer who receives CDBG-DR assistance to buy a property with intent to use as their primary residence.
- Tenants displaced from acquired properties may be eligible for relocation assistance.
- Other acquisitions undertaken by entities without eminent domain power acquiring real property under CDBG-DR are subject to 49 CFR 24.101(b)(2) requirements.



## *IV.F.5. CDBG displacement, relocation, acquisition, and replacement housing program regulations - Optional relocation assistance.*

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- This waiver allows subrecipients (e.g., local governments receiving CDBG-DR funds from state governments) to establish optional relocation policies.
- Without this waiver, subrecipients would not be able to establish optional relocation policies.
- Optional relocation policies are policies recipients (and, under CDBG-DR, subrecipients) may establish to provide relocation assistance to households, persons, or businesses that would otherwise be ineligible under the URA, or to provide additional relocation assistance not provided for under the URA.



# IV.F.6 *Waiver of Section 414 of the Stafford Act.*

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- Section 414 preserves a homeowner-occupant's and tenant's eligibility for a replacement housing payment under the URA, due to their inability to meet length of occupancy requirements because of a Presidentially declared disaster.
- Section 414 and its implementing regulation at 49 CFR 24.403(d)(1) are waived for CDBG-DR funded projects commencing more than one year after the date of the latest applicable Presidentially declared disaster undertaken by the grantees, or subrecipients, provided the project was not planned, approved, or otherwise underway before the disaster.
- This waiver assumes that after one year, most persons displaced by the disaster will have returned to their homes or established another permanent place of residence. The waiver also provides a definition for the phrase "project commencement."



# What is Project Commencement?

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For purposes of this waiver, a CDBG–DR funded project shall be determined to have commenced on the earliest of:

- (1) The date of an approved Request for Release of Funds and certification;
- (2) The date of completion of the site-specific review when a program utilizes Tiering; or
- (3) The date of sign-off by the approving official when a project converts to exempt under 24 CFR 58.34(a)(12).





# Resources and Training





# www.hud.gov/relocation

## REAL ESTATE ACQUISITION AND RELOCATION

### Overview

Real Estate Acquisition and Relocation program provides important protections and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for Federal or federally funded projects. On this site you will find useful information and resources to implement HUD funded programs and projects in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and other HUD requirements such as Section 104(d) of the Housing and Community Development Act.

The URA provides important protections and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for Federal or federally funded projects. This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a direct result of projects receiving Federal funds, are treated fairly and equitably and receive assistance in moving from the property they occupy.

HUD works closely with the U.S. Department of Transportation - Federal Highway Administration (FHWA), the designated Federal Lead Agency for the URA. Additional information concerning the URA is also available on the [FHWA web site](#).

### I Want To Review

- [Contacts](#)
- [FAQs](#)
  - [Uniform Relocation Assistance and Real Property Acquisition Corrective Actions for Residential Displacement FAQ](#)
  - [Uniform Relocation Assistance and Real Property Acquisition Policies Act FAQs](#)
  - [Illegal Aliens and the Uniform Act FAQs](#)
- [Forms](#)
- [HUD RAP Newsletters](#)
- [Laws and Regulations](#)
- [Policy and Guidance](#)
- [Publications](#)

### Resources

- [Real Estate Acquisition and Relocation Program Resources](#)
  - [Training](#)
  - [URA the HUD Way Module 7](#)

Content current as of October 21, 2021.







## Real Estate Acquisition and Relocation

This site provides information and resources to implement HUD funded programs and projects in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and other HUD requirements such as Section 104(d) of the Housing and Community Development Act of 1974.

[Learn about Acquisition and Relocation](#)

[Home](#) > [Programs](#) > Real Estate Acquisition and Relocation



### URA the HUD Way

These training modules provide basic information and resources to HUD grantees on topics such as budgeting, relocation, and



### Law and Policy

[Laws and Regulations](#)  
[Map-21 Update](#)



### Resources

[Forms and Brochures](#)  
[HUD RAP Newsletters](#)



### Disaster Recovery

[CDBG-DR page on HUD.gov](#)  
[CDBG-DR page on HUD Exchange](#)

# URA and Section 104(d) Introductory Videos

Before starting the modules, it may be helpful to view these quick informational videos.

## Introduction to the URA



This animated video provides a brief overview of the URA and is recommended to be viewed prior to commencing the modules below.

[View Video in English](#)

[View Video in Español](#)

## Section 104(d) Overview



This animated video provides an overview of the Section 104(d) of the Housing and Community Development Act of 1974 and its impact.

[View Video in English](#)

[View Video in Español](#)

## URA-DR



This animated video provides general guidance for URA and Section 104(d) requirements when using CDBG Disaster Recovery (CDBG-DR) funds.

[View Video in English](#)

[View Video in Español](#)





# URA the HUD Way Training



## Module 1: URA Overview

This module provides a basic overview of URA requirements for HUD programs and projects. It provides a brief history on the URA's purpose and objectives, URA highlights, and helpful information for users to recognize when HUD funded projects may be subject to URA requirements.

[Quiz and Feedback](#)

## Módulo 1: Descripción general de URA

Este módulo proporciona una descripción general básica de los requisitos de URA para programas y proyectos de HUD. Proporciona una breve historia sobre el propósito y los objetivos de URA, sus aspectos más destacados e información útil para que los usuarios reconozcan cuándo los proyectos financiados por HUD pueden estar sujetos a los requisitos de URA.

[Preguntas de prueba y comentarios](#)



## Module 2: Section 104(d) Overview

Section 104(d) is a federal law that applies to HUD's CDBG and HOME programs. This module will provide an overview of Section 104(d)'s purpose, objectives, and key requirements, including: 1) A Residential Antidisplacement and Relocation Assistance Plan (RARAP), 2) Relocation Assistance for Lower-income Persons, and 3) One-for-One Replacement of Lower-income Dwellings Demolished or Converted.

[Quiz and Feedback](#)

## Módulo 2: Descripción general de la Sección 104(d)

La Sección 104(d) es una ley federal que se aplica al programa de Subvenciones en Bloque para el Desarrollo Comunitario (CDBG) y al Programa de Alianzas e Inversiones de Vivienda (HOME) de HUD. Este módulo proporcionará una descripción general del propósito, objetivos y requisitos clave de la Sección 104 (d), que incluyen: 1) Un Plan de Anti-desplazamiento Residencial y Asistencia para Reubicación (RARAP), 2) Asistencia para Reubicación para Personas con bajos ingresos y 3) el Reemplazo Una por Una de Unidades de Vivienda asequibles, Demolidas o Convertidas.

[Preguntas de prueba y comentarios](#)



## Module 3: URA Planning & Budgeting

Good planning can help "make or break" a project. For federally assisted projects involving acquisition, rehabilitation, or demolition, it can prevent costly litigation, project delays, and serious financial consequences.

[Quiz and Feedback](#)



## Module 4: Real Property Acquisition

This module presents guidance on when and how real property acquisition is implemented under the URA. Along with the applicability of acquisition, it explains the conditions needed for "voluntary" and "involuntary" acquisition. The entire acquisition process is explained using flowcharts, examples, and case studies.

[Quiz and Feedback](#)



## Module 5: Residential Relocation

In accordance with the URA, any residential occupant who qualifies as a displaced person is entitled to payment for moving and related expenses and to an offer of comparable replacement housing. This module addresses permanent residential displacement.

[Quiz and Feedback](#)



## Module 6: Nonresidential Relocation

When a business must permanently relocate from real property as a direct result of acquisition, rehabilitation, or demolition for a federally funded project – *do you know what moves to make?*

The URA establishes the provisions for relocation assistance to eligible persons displaced by a federally assisted project. This module addresses nonresidential relocation for businesses, farms, and nonprofit organizations.

[Quiz and Feedback](#)



## Module 7: Temporary Relocation

Temporary relocation due to acquisition, rehabilitation, or demolition for a federally-funded project is subject to the URA. The goals of this module are to understand when temporary relocation is applicable, identify the general HUD requirements and guidance for temporary relocation, recognize the impact of temporary relocation on households and businesses, and describe eligible reimbursable expenses for temporary relocation.

[Quiz and Feedback](#)



## Module 8: Administration and Oversight

When HUD funded projects include acquisition, rehabilitation, or demolition, it is important to know URA requirements and have processes in place to ensure they are followed.

[Quiz and Feedback](#)



# Summary of Resources

- URA the HUD Way Training - Web-based training on URA and section 104(d) compliance, alongside informational videos.
- Laws and Regulations – URA and section 104(d) laws and regulations.
- Policy and Guidance – Handbooks, notices, and guidance documents.
- Additional DR Resources – Official CDBG-DR Resources and more on the HUD Exchange.
- Additional RRED Resources – FAQs, relevant Forms, HUD RAP Newsletters, additional Publications, and more on the HUD Exchange.
- Contacts – Contact information for RRED staff.



# Questions or Comments?

[DRSIPolicyUnit@hud.gov](mailto:DRSIPolicyUnit@hud.gov)







Thank You!

