

# ODR DIGEST



Quarterly Newsletter

VOLUME 12: SEPTEMBER 2024

**December 20, 2022:**  
Published CDBG-DR RFI.

**March 2023:**  
Sort public comments by topic and develop summary.

**Jan.-May 2024:**  
Began incorporating public comments and priorities into a draft Universal Notice.

**Fall 2024:**  
Publish the Universal Notice.

**February 21, 2023:**  
Public comment closes on CDBG-DR RFI.

**April-Dec. 2023:** Hosted internal CDBG-DR RFI Brainstorming and Policy Camp sessions.

**August 2024:**  
Finalize Universal Notice.

## The Universal Notice is Coming!

HUD's Office of Disaster Recovery (ODR) has been hard at work on the long-awaited "Universal Notice" and expects to publish it very soon. The anticipated outcomes associated with the Universal Notice includes a more streamlined disaster recovery experience and reduced administrative burden.

### Background & Timeline

To develop the Universal Notice, ODR's Policy Division solicited feedback through a request for information (RFI), which was published in December 2022 with a comment period closing in February 2023. From there, the public comments were analyzed, along with common waiver requests, CPD notices, and updated crosscutting requirements; all of this information was used to develop the Universal Notice.

Since that time, the Universal Notice has gone through many drafts and is swiftly moving toward its final form. The Universal Notice is a forward-looking document and will only apply to CDBG-DR grants allocated in the future.

### Looking Forward: A new process for CDBG-DR Launch

**Phase 1** of the new CDBG-DR launch process contains the biggest changes grantees can look forward to with the publication of the Universal Notice. Phase 1, the Action Plan, will include the components outlined below. By implementing this approach, grantees should see a reduction in action plan requirements, resulting in an Action Plan that is both more quickly available and easier for disaster survivors to understand.

### What to expect in this issue:

The Universal Notice

New ODR Products and Resources

DRGR Workshop Training Series

Relocation and Real Estate Division (RRED) Spotlight

RRED Resources



## The Universal Notice is Coming!

| Phase 1: Action Plan Components   |
|---|
| Unmet and Mitigation Needs Assessments, along with Fair Housing and Civil Rights Data Assessments                                   |
| Connectionb between proposed programs and projects and unmet needs, mitigation needs, and fair housing and civil rights assessments |
| Set allocation and award caps   |
| Establish funding criteria  |

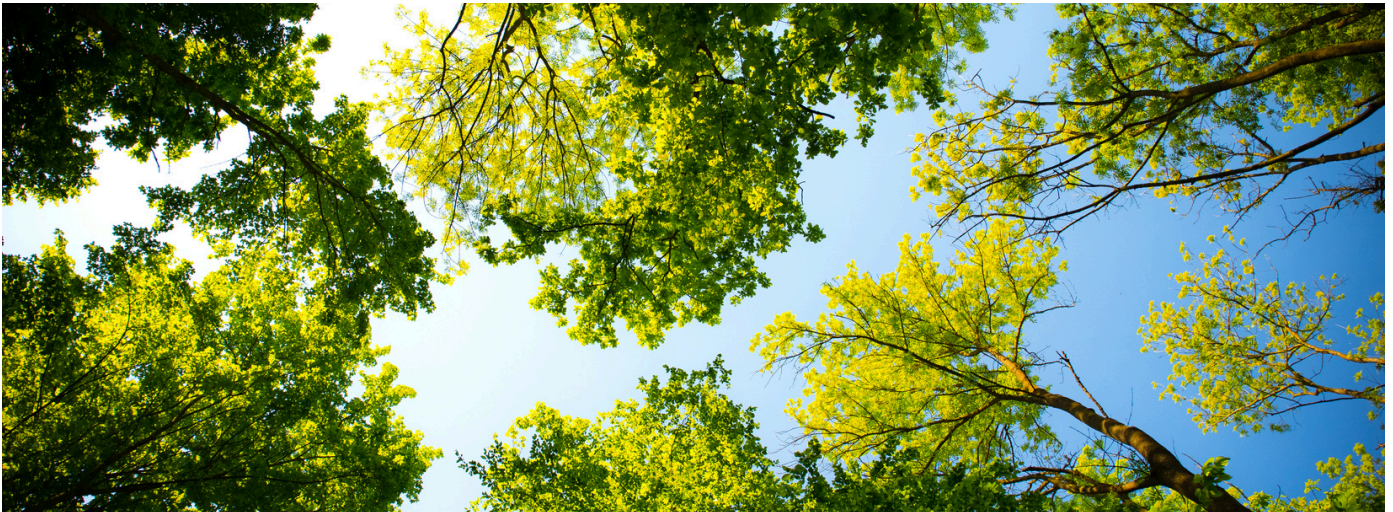
**Phase 2** of the new CDBG-DR launch process is the Evaluation of Management and Oversight of Funds. Similar to existing Financial Management and Grant Compliance Certification requirements under the Consolidated Notice, this updated process offers grantees the flexibility to rely on certifications for a set period. Additionally, HUD is introducing a new pre-certification option for potential grantees, designed to expedite the process. These enhancements are expected to enable grantees to prioritize their action plans initially, then transition to the pre-award certifications as HUD concurrently reviews the Action Plan. This streamlined approach aims to shorten the timeline for certification and action plan approval, helping grantees reach the grant agreement stage sooner, accelerating recovery.

**Phase 3** of CDBG-DR launch focuses on Implementation. Grantees will establish detailed program requirements through their policies and procedures, aligning their internal processes with the activities outlined in their action plans. This new approach gives grantees more time with their approved Action Plan, enabling them to design programs more accurately to meet the needs of disaster survivors while also building internal capacity. The anticipated outcome is that grantees will be able to serve disaster survivors more quickly by directing their capacity towards programs that address the most immediate needs.

### Post Universal Notice Publication

Once the Universal Notice has been published, new grantees can expect training and guidance from ODR. There will be more information coming later in the fall, so keep an eye on your email for updates!





## New ODR Products and Resources

The ODR is always looking for ways to help grantees implement the recovery process in their communities. In the fourth quarter of fiscal year 2024, ODR released several guidance documents designed to assist CDBG-DR grantees with implementing their programs. Now posted on HUD.gov:

**1. Updated CDBG-DR Exhibits in the CPD Monitoring Handbook:** This handbook includes the exhibits used by HUD reviewers to assess grantee compliance with program regulations, applicable federal statutes, grant requirements, and terms and conditions of the grant awards for Community Planning and Development (CPD) programs. HUD completed a series of updates to the Chapter 6 Exhibits. This change also added funds for disasters occurring in 2018 and 2019 to Addendum 6-14, and CDBG-Mitigation funds for disasters occurring in 2018 to Addendum 6-15.

**2. Interchangeability Checklists:** To further support grantees with the implementation of interchangeability, ODR developed The Program Administrative Costs Interchangeability Checklist and the Grant Funds Interchangeability Checklist as companion tools to help CDBG-DR grantees establish interchangeability processes, policies, and procedures. Before diving in the Interchangeability Checklists, please review CDBG-DR Policy Bulletin 2023-02: Interchangeability Provisions and Other Flexibilities!

**3. Federal Flood Risk Management Standard (FFRMS) Frequently Asked Questions for CDBG-DR and CDBG-MIT Grantees:** This document is intended to help Community Development Block Grant Disaster Recovery (CDBG-DR) and CDBG-Mitigation (CDBG-MIT) grantees understand how the new FFRMS rule affects their projects.

### Technical Assistance Products Spotlight

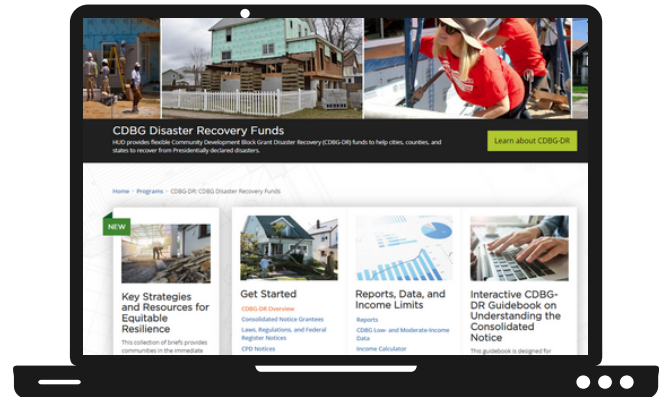
[Form a Foundation on the CDBG-DR Consolidated Notice Learning Pathway](#)

[Homeless Response System 101 for CDBG-DR Grantees](#)

[Extreme Heat Quick Guide](#)

# Training Spotlight

[CLICK HERE TO REGISTER](#)



## Register Today: 2024 DRGR for Disaster Recovery Workshop Series

This interactive in-person workshop for disaster recovery grantees will provide live demonstration of the Disaster Recovery Grant Reporting (DRGR) System and allow participants to practice in a mock-DRGR training environment. The goal of the workshop is to teach grantees how to effectively tell their community's recovery story and meet reporting requirements.

### Objectives

- Understand and use DRGR functions in all modules
- Work in a hands-on environment to apply the class lessons to case study exercises
- Access DRGR reports to analyze data
- Learn to troubleshoot common DRGR mistakes and answers to questions
- Gain knowledge on all aspects of DRGR reporting requirements and best practices

### Audience

This training is intended for Community Development Block Grant Disaster Recovery (CDBG-DR) grantees.

For-profit corporations, consultants, and consulting firms are not permitted to register for this workshop series.

### Workshop Format

This in-person workshop provides hands on instructions in a classroom environment. This workshop is two full days of instruction and will include presentations, demonstrations, and exercises using a mock-DRGR training environment

# Crosscutting Regulations Mini Series



ODR is excited to continue our miniseries that will be featured in our upcoming ODR Digests, highlighting each of our crosscutting partners and their applicable regulations! One of the key benefits of CDBG-DR funding is the flexibility and alternative requirements that HUD can establish to ensure we're expediting recovery. However, it is critical for grantees to understand that certain requirements, as outlined in each of the appropriations acts, cannot be waived by HUD (i.e., HUD does not have the waiver authority).

All grantees must follow all crosscutting requirements, as applicable, for all CDBG-DR funded activities including but not limited to:

**Environmental  
Review**

**Davis Bacon and  
Related Acts  
(DBRA)**

**Fair Housing  
and Civil Rights**

**Lead Safe  
Housing Rule**

**Uniform  
Relocation Act  
(URA)**

Our mini series dives into each of these crosscutting requirements through the lens of other HUD offices, providing training, frequently asked questions (FAQs), and other impactful resources. The design of this content can also serve as a mini overview of the associated requirements.

This volume will focus on the Uniform Relocation Act (URA), and readers are encouraged to visit the previous digest focused on [environmental review](#) and [Lead Safe Housing Rule](#)!



## Relocation and Real Estate Division Spotlight

The Relocation and Real Estate Division (RRED) is located within HUD's Community Planning and Development's (CPD) Office of Affordable Housing Programs. RRED is responsible for numerous policies and regulations and does many things to support CDBG-DR grantees, such as:

- Having Departmental Delegation of Authority for the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and its regulation at 49 CFR Part 24 (URA);
- Developing and implementing policies for Section 104(d) of the Housing and Community Development Act of 1974, as amended, and its regulation at 24 CFR Part 42 (Section 104(d));
- Facilitating the implementation of the CDBG's Displacement, Relocation, Acquisition and Replacement of Housing requirements at 24 CFR 570.606; and
- Working to address compliance and implementation inquiries for disaster recovery and mitigation activities that relate to the acquisition of real property and the relocation of persons (individuals, families, businesses, farms and non-profit organizations).

RRED is ready to assist grantees working with the Office of Disaster Recovery (ODR) in the areas of policy development and guidance, training, and technical assistance. If you have questions or inquiries pertaining to URA, section 104(d) or CDBG's related requirements, please contact the [HUD Regional Relocation Specialist](#) in your area. Do not forget to cc your HUD assigned Grant Manager!

On May 3, 2024, the Federal Highway Administration (FHWA), as the lead agency, published the [Uniform Act Final Rule](#) in the Federal Register with an effective date of June 3, 2024. Stay tuned for further guidance on how the new rule will apply to HUD programs, including CDBG-DR.

The URA applies to acquisition, rehabilitation, and demolition activities for federally funded projects, including HUD-funded disaster recovery projects under CDBG-DR and CDBG-MIT. The URA establishes minimum federal requirements for real property acquisition and relocation of persons. Its primary objective is 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.



## RRED Spotlight

The following question and answer (Q&A) section covers Section 104(d) and Residential Anti-displacement and Relocation Assistance Plans (RARAP), which are applicable requirements for CDBG-DR grantees. For additional information please visit the resources linked on the following pages.

### Section 104(d): Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs (24 CFR Part 42)

Q: WHAT IS SECTION 104(D)?

A: SECTION 104(D) REFERS TO A SECTION OF THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1974 (HCDA), AS AMENDED, THAT IS SEPARATE FROM THE URA.

Q: WHAT ARE THE KEY OBJECTIVES OF SECTION 104(D)?

A: ITS KEY OBJECTIVES ARE TO MINIMIZE DISPLACEMENT, TO PROVIDE RELOCATION ASSISTANCE TO DISPLACED LOWER-INCOME PERSONS, AND TO REPLACE LOWER-INCOME HOUSING DEMOLISHED OR CONVERTED.

Q: WHAT MUST GRANTEEES DO WHEN SECTION 104(D) IS TRIGGERED?

A: GRANTEEES MUST CREATE AND EXECUTE A COMPLIANT RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN (RARAP) (24 CFR 42.325).

Q: WHAT IS A RARAP?

A: AS A CONDITION TO RECEIVE CDBG (OR CDBG-DR) ASSISTANCE, THE GRANTEE MUST CERTIFY THAT IT HAS IN PLACE AND IS FOLLOWING A RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION ASSISTANCE PLAN (RARAP) BEFORE IMPLEMENTING ASSISTED ACTIVITIES.

Q: WHAT MUST BE INCLUDED IN A RARAP?

A: SUBJECT TO APPLICABLE FEDERAL NOTICE (FN) WAIVERS AND ALTERNATIVE REQUIREMENTS, IN THE RARAP, GRANTEEES MUST IDENTIFY THE REASONABLE STEPS IT WILL TAKE TO MINIMIZE DISPLACEMENT OF PERSONS AS A RESULT OF AN ASSISTED ACTIVITIES, DESCRIBE RELOCATION ASSISTANCE THAT WILL BE PROVIDED TO LOW- AND MODERATE-INCOME TENANTS AND REPLACE ALL OCCUPIED AND VACANT OCCUPIABLE AFFORDABLE UNITS DEMOLISHED OR CONVERTED TO OTHER USES. MANY FEDERAL REGISTER NOTICES PROVIDE WAIVERS TO SECTION 104(D) RELOCATION AND ONE-FOR-ONE REPLACEMENT IF CERTAIN ALTERNATIVE REQUIREMENTS ARE MET AND DOCUMENTED.

## RRED Resource Spotlight

CLICK EACH ITEM BELOW



| Title   | Description   |
|---|---|
| <a href="#"><u>Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs</u></a>              | 49 CFR Part 24 is the government-wide regulation that implements the URA.   |
| <a href="#"><u>Tenant Assistance, Relocation and Real Property Acquisition Handbook (1378.0)</u></a>  | HUD Handbook 1378 outlines policy and guidance on implementing the URA and section 104 (d). The Handbook may be impacted by the Final Rule. Users should check the HUD Exchange website for new updates.  |
| <a href="#"><u>Section 104(d): Displacement, Relocation Assistance, and Real Property Acquisition for HUD and HUD-Assisted Programs</u></a> | 24 CFR Part 42 is the HUD regulation that implements section 104 (d).   |
| <a href="#"><u>CDBG Programmatic Regulation: Displacement, Relocation, Acquisition, and Replacement of Housing</u></a>                      | 24 CFR 570.606 requirements also apply to CDBG-DR/MIT activities.   |
| <a href="#"><u>CPD Notice 17-09 Management of Community Development Block Grant Assisted Real Property</u></a>                              | Information to assist grantees and subrecipients in meeting CDBG program requirements governing the acquisition, management and disposition of real property (including compliance with URA requirements).  |
| <a href="#"><u>CDBG-DR Consolidated Notice Implementation Guidance</u></a>  | This implementation guidance provides guidance and resources on the applicability and implementation of the URA, section 104(d) and CDBG Displacement, Relocation, Acquisition and Replacement of Housing program requirements that apply to CDBG-DR projects and activities. |
| <a href="#"><u>CDBG-DR URA Overview Video</u></a>   | This animated video provides general guidance for the URA and section 104(d) requirements when using Community Development Block Grant Disaster Recovery (CDBG-DR) funds.   |

## RRED Resource Spotlight

CLICK EACH ITEM BELOW



| Title  | Description  |
|--|--|
| <a href="#"><u>RRED HUD Exchange</u></a>                   | This site provides information and resources to implement HUD funded programs and projects in accordance with the URA and other HUD requirements such as section 104(d). |
| <a href="#"><u>RRED Trainings</u></a>                      | Find information about training courses and resources on Real Estate Acquisition and Relocation under the URA and other HUD requirements.                                |
| <a href="#"><u>HUD Regional Relocation Specialists</u></a> | If you have questions or inquiries pertaining to URA and section 104(d) requirements, please contact the HUD Regional Relocation Specialist in your area.                |
| <a href="#"><u>RRED Listserv</u></a>                       | Subscribe to the RRED listserv for email updates on new resources, training opportunities, HUD policies, and more.   |



## Stay Engaged



Thanks for reading this edition of the ODR Digest! If you have any questions, feel free to reach out directly by emailing the ODR's Policy Division, [ODRPolicyDivision@hud.gov](mailto:ODRPolicyDivision@hud.gov).

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