



## HUD

Office of Community Planning and Development  
Los Angeles Field Office

## Information Bulletin

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**MEMORANDUM FOR:** Community Development Block Grant (CDBG) Grantees, HOME Participating Jurisdictions (PJ), Neighborhood Stabilization Program (NSP) Grantees

**FROM:** Robert G. Ilumin, Deputy Director, Office of Community Planning and Development

**SUBJECT:** Overall Management of Acquisition and Relocation

This year's monitoring of acquisition and relocation activities in the Los Angeles Field Office's jurisdiction shows that most findings are caused by a lack of management attention to compliance with the Uniform Relocation and Property Acquisition Act and Section 104(d) of the Housing and Community Development Act of 1974. URA compliance is triggered when HUD funds are used in projects involving acquisition, demolition, rehabilitation and/or new construction. Section 104(d) compliance is triggered when CDBG/ HOME funds are used in a project that demolishes or converts low income housing to a use other than low income housing.

### Steps to Improving Overall Management of Projects Involving Acquisition and Relocation

1. Consolidate Acquisition and Relocation Resources- Place all HUD regulations and guidance about acquisition and relocation in a single location, as hard copies in a binder or on a shared drive. At a minimum these materials should include:
  - URA Statute and Regulations at 49 CFR Part 24
  - Section 104(d) statute and Regulations at 24 CFR Part 24
  - URA Questions and Answers
  - HUD Handbook 1378
  - HUD Headquarters Relocation and Acquisition Policy (RAP)
  - Los Angeles Field Office Information Bulletins \*\*
2. Assign Staff- Assign overall responsibility for complying with acquisition and relocation rules to a specific manager, supervisor and/or program staff who will review all projects involving acquisition and relocation for compliance with the URA and Section 104(d).
3. Develop Procedures- Develop new procedures or add to existing procedures steps for managing HUD funded projects that involve acquisition, demolition, rehabilitation and/or relocation. Management begins at the application stage, continues when the project is approved and the contract between the grantee and the implementing agency are executed and intensifies during project implementation. HUD staff has developed a sample set of procedures that grantees may use as a starting point. At a minimum these procedures should include:

\*\*CPD Notices- 2007-04- Last Resort Housing; CPD Notice 2008-01-Decline in Housing Prices; CPD Notice 2008-04- Using Relocation Consultants ;CPD Notice 2008-05-Monitoring Update; CPD Notice 2008-06- Program Issues in Monitoring; CPD Notice 2009-03- Homebuyer Programs; CPD Notice 2009-04-URA and NSP Program

- Checklists for staff to use in reviewing each stage of the project i.e., NOFA/Application, project approval, contract execution, implementation and closeout
- Staff responsibility for overseeing projects involving acquisition, demolition, rehabilitation and new construction, overseeing consultants and approving legal residency exceptions, relocation payment decisions, special determinations and appeals, etc.
- Grantee policies on replacement unit occupancy standards, legal residency exceptions, claims processing, evictions and appeals, etc
- Documentation requirements for: establishing project boundaries, tracking the acquisition, supporting relocation claims (i.e. evidence of income, rent, utilities, inspections, comparable housing ) and making special determinations

#### 4. Train Staff

- Require staff to attend HUD training whenever it is offered
- Provide in house training on its own internal acquisition and relocation procedures

#### 5. Educate Third Party Partners- Educate sponsors, CHDO's and sub-recipients about the acquisition and relocation requirements at the beginning of the application process.

- Include the requirements in the NOFA or other application materials and the contract
- Have an opening conference upon project approval or contract execution to advise all participants of the acquisition and relocation requirements

#### 6. Manage the Application and Approval process

- Review all activities that involve acquisition, demolition, rehabilitation, new construction and relocation. Determine the project boundaries and determine whether the project must comply with the URA and/or Section 104(d).
- Hire a qualified consultant to assist you early in the process, at the planning stage.
- Review all acquisition letters and evidences of value, prepare any written justifications.
- Review preliminary relocation plan to estimate costs
- Review list of occupants and the wording of all notices

#### 7. Manage the Implementation Process

- Track occupants and progress of the relocation ( meetings and/or written reports)
- Review all Notices (wording) and ensure delivery will be document
- Review Claims and Supporting Documentation and document the payment process
- Review Appeals and decisions of Non Payment

#### 8. Close-Out- Review projects to ensure all supporting documents are placed in the files and will be available in case of a HUD review.

**To obtain a set of sample procedures or to arrange individual technical assistance any of the above issues contact [Jana.Bickel@hud.gov](mailto:Jana.Bickel@hud.gov) or (213) 534-2581.**