

CHAPTER FOUR RELOCATION AND DISPLACEMENT

1. OVERVIEW

- A. **THE UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES ACT OF 1970 (UNIFORM ACT)** – The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), and its implementing regulations, 49 CFR Part 24 requires relocation assistance when a project causes the displacement of an occupant through rehabilitation, demolition, or acquisitions including federal funding.
- B. **Under 24 CFR Parts 91 and 93 as codified in § 93.352; Displacement, relocation, and acquisition** – When relocation is triggered, developers may need to replace any low/moderate income dwelling units that are lost to the conversion or demolition. This chapter covers only residential relocation. If non-residential (commercial/industrial) relocation is involved, contact THDA.

2. PROGRAM DESIGN CONSIDERATIONS FOR NHTF ADMINISTRATORS

- A. **RELOCATION CONSIDERATIONS IN PROJECT SELECTION** – Concerns about relocation may cause an administrator to consider establishing a preference for vacant buildings. However, administrators should also consider:
1. Vacant buildings are often very deteriorated. Rehabilitating an occupied building even with the cost of assisting tenants to remain or relocate, may be less costly than rehabilitating a vacant building.
 2. Occupied buildings may require the displacement of occupants both residential and commercial. Displacement can occur because of eligibility of the existing occupants to remain on the property at the completion due to income and occupancy restrictions. Economic displacement may occur if the cost of occupancy is no longer affordable. An early project planning step would be to determine the existing occupancy of the property and determine if the existing tenants will be able to remain on site once the project is completed or if displacement will be triggered. A fully occupied property may be a good target for modest rehabilitation while not triggering any permanent relocation.
 3. Selecting vacant projects does not relieve all relocation concerns. Vacant buildings in good condition may have been recently occupied. If so, the program administrator must consider whether the owner removed the tenants in order to apply for NHTF assistance for a vacant building. If so, these tenants are displaced persons.
 4. In occupied buildings, program administrators must consider whether occupants will be able to return after rehabilitation and whether Section 8 is available to avoid displacement and whether Section 8 assistance is available to help meet relocation costs.
 5. Grantees need to evaluate the feasibility of each project including the full scale of the rehabilitation along with all costs and administrative requirements related to the potential

displacement. To complete the step grantees will need to gather detailed information about the occupancy of the structure – an existing owner may not have income information for the existing residential tenants. Displacement of commercial tenants can be complicated and expensive.

- B. **MINIMIZING DISPLACEMENT** – Consistent with the NHTF rules and THDA's Non-Displacement Plan, each Grantee must insure that it has taken all reasonable steps to minimize the displacement of persons as a result of a project assisted with NHTF funds. To the extent feasible, residential tenants must be provided a reasonable opportunity to lease and occupy a suitable, decent, safe, sanitary, and affordable dwelling unit in the building/complex upon completion of the project.
- C. **NEED FOR SKILLED RELOCATION STAFF** – Skilled staff can save the local program money and build goodwill with owners and tenants. Failure to understand and follow relocation requirements can result in unnecessary costs for the local program.
- D. **EARLY DISCUSSIONS WITH OWNERS AND PROGRAM STAFF** – It is possible for uninformed owners and staff to take steps that would obligate the local program to provide significant relocation benefits and services. Early briefings for owners and program staff on relocation rules are essential.

3. RELOCATION REFERENCE MATERIAL AND RESOURCES

- A. **HANDBOOK 1378** – [Handbook 1378, Tenant Assistance, Relocation and Real Property Acquisition](#) consolidates relocation requirements for NHTF and other HUD programs in one document. It is available from HUD Field Offices or by contacting THDA.
- B. **INFORMATIONAL BOOKLETS** – HUD informational booklets for persons who are displaced or whose property is to be acquired are available from HUD Field Offices or by contacting THDA.
- C. **HUD WEBSITE** – https://www.hud.gov/program_offices/comm_planning/affordablehousing/training/web/relocation/planning

4. UNIFORM RELOCATION ACT REQUIREMENTS

- A. **TRIGGERING URA** – URA requirements are triggered at the time the owner's proposal is submitted and additional requirements are triggered at the time the agreement is signed between the owner and the grantee.
- B. **TREATMENT OF DISPLACED PERSONS** – Treatment of displaced persons depends upon whether the displaced person is a tenant or owner; a business or family; has income above or below the Section 8 Lower Income Limit.
- C. **TEMPORARY RELOCATION OF RESIDENTIAL TENANTS** – Residential tenants who will not be required to move permanently but who must relocate temporarily for the project must be provided reimbursement for all reasonable out-of-pocket expenses incurred in connection with

the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly rent/utility costs.

1. In addition, these tenants must also be provided with:
 - a. Appropriate advisory services, including advance written notice of the date and approximate duration of the temporary relocation;
 - b. The location of the suitable, decent, safe and sanitary dwelling to be made available for the temporary period; Tenants with special needs such as mobility or sensory impairments will need to be placed in appropriate temporary relocation units;
 - c. The terms and conditions under which the tenant may lease and occupy a unit in the building/complex upon completion of the project.
 - d. An offer of permanent relocation assistance if the relocation continues in excess of one year.

D. **DISPLACED PERSON** – A person (family individual, business, non-profit organization or farm, including any corporation, partnership or association) that moves from the real property or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted with NHTF funds. This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

1. After notice by the owner to move permanently from the property, if the move occurs on or after:
 - a. The date of the submission of an application to the State or HUD, if the applicant has site control and the application is later approved; or
 - b. The date the State approves the applicable site, if the applicant does not have site control at the time of the application; or
 - c. Before the date described in paragraph 4.4(1)(a-b) above if the State or HUD determines that the displacement resulted directly from acquisition, rehabilitation or demolition for the project; or
 - d. By a tenant-occupant of a dwelling unit, if any one of the following situations occurs:
 - i. The tenant moves after execution of the agreement covering the acquisition, rehabilitation or demolition and the move occurs before the tenant is provided written notice offering the tenant the opportunity to lease and occupy a suitable, decent, safe and sanitary dwelling in the same building/complex upon completion of the project under reasonable terms and conditions. Such reasonable terms and conditions must include a term of at least one year at a monthly rent and estimated average utility costs that do not exceed the greater of:

- 1) The tenant's monthly rent before such agreement and estimated

average monthly utility costs; or

- 2) The total tenant payment, as determined under 24 CFR 813.107, if the tenant is low-income, or 30% of gross household income, if the tenant is not low-income;
- ii. The tenant is required to relocate temporarily, does not return to the building/complex, and either:
 - 1) The tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation: or
 - 2) Other conditions of relocation are not reasonable: or
 - iii. The tenant is required to move to another dwelling unit in the same building/complex but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move, or other conditions of the move are not reasonable.

E. NON-DISPLACED PERSON – A person *does not qualify as a displaced person if:*

1. The person has been evicted for cause, based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violation of applicable federal, State or local law, or other good cause, and the State determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance. The effective date for any termination or refusal to renew must be preceded by at least 30 days advance written notice to the tenant specifying the grounds for the action.
2. The person moved into the property after the submission of the application but, before signing a lease and commencing occupancy, was provided written notice of the project, its possible impact on the person (e.g., the person may be displaced, temporarily relocated, incur a rent increase), and the fact that the person would not qualify as a “displaced person” (or for any assistance under this section) as a result of the project;
3. The person is ineligible under 49 CFR 24.2(g)(2); or
4. HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

F. INITIATION OF NEGOTIATIONS – For purposes of determining the formula for computing replacement housing assistance to be provided under the Uniform Relocation Act to a tenant displaced from a dwelling as a direct result of private-owner rehabilitation, demolition or acquisition of the real property, the term initiation of negotiations means the following:

- a. When a Federal or State Agency is acquiring the property, the initiation of negotiations means the initial written offer of compensation to purchase the property from the owner. If the Federal or State Agency issues a notice of intent to acquire the property but the person moves out before the written purchase offer, the initiation of negotiations means the actual move of the person from the property.

2. When the displacement occurs due to rehabilitation, demolition or a private acquisition, the initiation of negotiations means the Notice of Eligibility for Relocation or if there is no notice, the actual move of the person.
3. When the Federal Government, working under the Comprehensive Environmental Response Compensation and Liability Act of 1980, elects to permanently relocate persons to protect public health and welfare, the initiation of negotiations means the formal announcement or advisory.
4. When the Agency acquiring the property is receiving Federal financial assistance for project costs, but not the actual acquisition, the initiation of negotiations means the execution of the written agreement between the Agency and the property owner.

G. ADVISORY SERVICES – Relocation advisory services must be offered and shall include such measures, facilities, and/or services as may be necessary or appropriate to:

1. Determine the need of displaced persons for relocation assistance.
2. Provide current and continuing information on availability, prices, and rentals of comparable replacement properties and housing. A displaced person must be advised of his or her rights under the Fair Housing Act (42 U.S.C. 3601-19) and, if the comparable replacement dwelling used to establish the amount of the replacement housing payment to be provided to a minority person is located in an area of minority concentration, the minority person also must be given, if possible, referrals to comparable and suitable, decent, safe and sanitary replacement dwellings not located in such areas.
3. Assure that, prior to displacement, decent, safe and sanitary comparable replacement dwellings will be available to displaced persons.
 - a. Decent, safe and sanitary are defined as meeting local housing and occupancy codes, or where those do not exist, Section 8 Existing Housing Standards. The unit must also be free of lead-based paint hazards. If the person being displaced is disabled, reasonable accommodations must be made specific to the disability.
 - b. Comparable units refer to size, condition, type of neighborhood, and access to employment, public and commercial facilities.
4. Ensure that the "decent, safe, and sanitary comparable dwelling" is affordable and available to displaced persons.
 - a. The replacement unit actually selected must be standard and it may be a better unit than the displaced unit. So, if the displacee chooses to relocate to a better unit, the Grantee should base the relocation payment on the difference between the most comparable unit and the displaced unit or ability to pay, and not on the cost of the unit that the displacee wants to move in.
 - b. Affordable means that the monthly housing costs shall not exceed 30% of the household's income with the replacement housing payments.
5. Inspect the actual replacement unit selected by the client to ensure it meets "decent, safe, and sanitary" requirements along with any identified special accommodation needs such

as accessibility modifications

6. Supply information concerning Federal and State housing programs and services.
7. Provide counseling to affirmatively further fair housing. The regulations require that the Grantee make available to low income and minority families special counseling and related services, e.g., transportation services. The Grantee may secure these services through fair housing or civil rights groups.
8. Provide other advisory services to displaced persons in order to minimize hardships.

H. **BENEFITS AS RIGHTS UNDER THE UNIFORM ACT** – The Grantee should stress that the benefits under the Uniform Act are "rights" to which the individual is entitled and that the Grantee's job is to ensure that all displacees receive the maximum amount of benefits to which they are entitled.

1. It should also be explicitly stated that there are no income or need criteria for benefits. All persons, regardless of income level, are eligible if they are relocated.
2. Certain benefits may be prorated for unrelated individuals living together.

I. **NOTICE REQUIREMENTS** – All occupants must receive timely notices explaining whether or not they will be displaced. This applies to REHABILITATION AS WELL AS ACQUISITION projects. *Failure to issue appropriate notices in a timely fashion may result in relocation payments made where they would otherwise not have been required.*

1. The **General Information Notice** must be provided as soon as is feasible after application, and must explain that the project has been proposed, and caution the occupant not to move prematurely. Additional information should also be included in this notice.
2. The **Move-in Notice** informs prospective tenants before moving into potential projects that they may be displaced and that they will not be entitled to assistance.
3. A **Notice of Non-displacement** or a **Notice of Eligibility for Relocation Assistance** must be issued at the time the project agreement is executed. For a rehabilitation project, this refers to the execution of the funding agreement between the Grantee and the owner. For acquisition, this is when an agreement is executed between the purchaser and the seller.
4. The **Temporary Relocation Notice** informs households who will be temporarily relocated of their rights and of the conditions of their temporary move.
5. The **Notice of Eligibility** informs households to be displaced of their rights and levels of assistance under the URA.
6. The **90 and 30 Day Notices** inform displaced households of the day by which they must vacate the property. Note that displaced households may not normally be given less than 90 days to vacate their residence. The 90 Day Notice can be incorporated into the Notice of Eligibility. The 30 Day Notice may be used in certain circumstances.

J. STEPS IN PROVIDING RELOCATION ASSISTANCE

1. Design and adopt the relocation assistance program guidelines which address eligibility, payments, counseling services, grievance procedures and operating procedures. They must be written in language that is understandable. If English is not the primary language of the displacee, foreign language translations must be made available.
2. Identify individuals to be relocated as soon as possible and any special considerations to special populations, i.e., minorities, the elderly, large families or persons with disabilities.
3. All notices must:
 - a. Be written in plain understandable language. If individuals do not speak English, the Grantee must make all notices available in appropriate translations;
 - b. Be hard delivered with receipt documented, or sent certified mail, return receipt requested; and
 - c. Contain the name and phone number of a person who may be contacted for answers to questions or other needed help.
4. Interview each recipient to determine his/her need for assistance. A sample interview format is provided to show the type of information that is required. During this interview, review the relocation process with the relocatees and ensure that they understand the process. Special attention should be given to:
 - a. The assistance to be provided;
 - b. The benefits available;
 - c. The fact that replacement housing payments cannot be made unless the household relocates to a standard unit;
 - d. The importance of keeping in touch with the Grantee; and
 - e. The need to notify the Grantee before they move.
5. Prepare the relocation record.
6. Determine replacement housing needs. All comparable units must be decent, safe, and sanitary, as defined above. In addition, they must be affordable.
7. Inventory available housing. The Grantee shall prepare an inventory of available housing which meets the identified needs. Please note that the regulations require that the Grantee make comparable replacement housing available to low income or minority relocatees in areas that do not have concentrations of either low or minority households, if such opportunities are available. This means that if there are vacant, standard affordable units available in middle/upper income areas or predominantly white areas of the city/county, low income or minority relocatees must be given replacement housing choices in those areas before the Grantee can give such relocatees a 90-Day

Notice to Vacate.

8. Send a "Notice of Eligibility" at initiation of negotiations.
9. If the occupant is going to be able to continue to reside in the building or in a nearby building located on the same site, the occupant must be sent a Notice of Non-Displacement.
10. Provide assistance in securing suitable units. The process of finding suitable housing will involve continuous contact with displacees to solicit information, establish rapport, provide referrals to re-housing resources, accompany displacees to inspect possible dwellings, etc.
 - a. Up-to-date information on the availability, prices, and rentals of comparable sales and rental housing must be provided.
 - b. All units must be inspected and certified as meeting code before being placed on a referral list.
 - c. The Grantee must offer transportation to displaced persons to inspect the units to which they are referred.
 - d. The Grantee must provide assistance in cases of housing discrimination. While it need not become a prosecutor, the Grantee must press displacee's claims of discrimination.
11. Complete processing claims and make payments.
 - a. If the Grantee has made a reasonable choice of suitable replacement housing opportunities available to the relocated, the Grantee may issue the 90-Day Notice to Vacate. The date on which the property must be vacated cannot be less than 30 days after the Grantee has obtained title to the property or legal right of possession, whichever comes earlier.
 - b. Payments should be issued within 30 days following the submission of sufficient documentation to support the claim.
 - c. Advance payments must be made where they would avoid or reduce a hardship. When advance payments are made, the Grantee must document that the payment was used for the purpose intended.
 - d. The Grantee should have the recipient sign a letter acknowledging receipt of relocation payments.
12. If relocation has not been completed within 6 months of the date of issuance of the Notice of Eligibility, the Grantee must document in its files the reason for the delay and a plan for timely completion.
13. If the relocation involves inhabitants of mobile homes, the Grantee should follow the procedures contained in the part of the regulations pertaining to mobile home occupants (49 CFR Part 24 Subpart F).

14. The Agency may not suggest or request a waiver of relocation assistance. If a displaced person has been advised of all relocation payments and assistance to which they are entitled and still refuses to accept some or all of the assistance, the Agency should document the refusal in writing.

K. PAYMENTS

1. **MOVING COSTS** – All displaced persons are eligible for moving costs. The displaced person can choose to receive either:
 - a. A fixed moving expense, based upon number of rooms in the residence. Any person displaced from a dwelling or seasonal residence, is entitled to receive an expense as an alternative to a payment for actual moving and related expenses. This allowance is determined according to the applicable schedule approved by the Federal Highway Administration.
 - b. Actual moving and related expenses, supported by bills and other documentation that cover actual moving costs for: (1) transportation of the displaced person and personal property for a distance up to 50 miles unless it is determined that relocation beyond 50 miles is justified; (2) packing and unpacking personal property; (3) disconnecting, dismantling, reassembling and reinstalling relocated household appliances and other personal property; (4) storage of the personal property for a period not to exceed 12 months unless it is determined a longer period is necessary; (5) insurance in connection with move and storage; and (6) other costs related to the move if approved by the Grantee as reasonable.
2. **REPLACEMENT HOUSING PAYMENTS UNDER THE URA** – These payments are available to owner-occupants and tenants that meet the following conditions:
 - a. A displaced 180-day owner-occupant who relocates to an ownership unit is eligible for a replacement housing payment. The payment represents the combined cost of:
 - i. The cost difference between the acquisition price and the lesser of the actual unit plus purchase price and the decent, safe, and sanitary comparable replacement unit;
 - ii. Increased costs;
 - iii. Eligible incidental settlement (closing) costs; and
 - iv. May not exceed \$22,500.
 - b. A tenant or owner-occupant who has occupied the property for 90 days who relocates into a rental unit is eligible for a replacement housing payment. This payment takes into account several factors, including the household's ability to pay, old rent and utilities, the rent/utilities of a comparable unit, and the rent/utilities of the unit they actually rent. Ability to pay under the URA is 30% of gross monthly income. The replacement housing payment is calculated as the

difference between: the lower of the ability to pay and the old rent/utilities; and the lower of the comparable rent/utilities and the rent/utilities of the new unit they actually select. The payment may not exceed \$5,250.

- c. For households who have been in residence less than 90 days, the replacement housing payment is calculated as the difference between the ability to pay and the lower of the comparable unit rent/utilities and the actually selected unit rent/utilities.
 - i. Both the 90 day and the less than 90 day tenant must receive their replacement housing payment in installments.
- d. A tenant who relocates to an ownership unit is eligible for a down payment assistance payment. The down payment assistance payment must be applied to the purchase price of the replacement dwelling and related incidental expenses. Down payment assistance for a renter that wishes to become a homeowner is calculated in the same manner as the renter assistance payment except that there is no provision for the new unit actually selected by the household. The down payment assistance must be paid in lump sum.
- e. While not a requirement, the program administrator may work with the local PHA to offer eligible displaced tenants a Section 8 Certificate or Housing Voucher necessary as an alternative to cash rental assistance.
 - i. A displaced person must be informed of his or her option to choose cash or, if offered, Section 8 assistance.
 - ii. Since Section 8 assistance is adjusted periodically for increased market rents and because it is unlikely to cease at the end of 42 months, this will be a more valuable option than cash for a substantial number of lower-income tenants. The program also benefits when Section 8 assistance is used in place of a replacement housing payment.
 - iii. In the unusual case where the displacement dwelling rent/utility cost is less than the TTP, the tenant is eligible for cash to cover the gap. In the case of a Section 8 Voucher, if the rent/utility cost of the replacement dwelling (actual or comparable, whichever is less) exceeds the payment standard, the tenant will qualify for cash to cover the gap.

L. SPECIAL CONSIDERATIONS CONCERNING THE DENIAL OF CLAIMS

- 1. Payments for down payment assistance must be applied to the purchase of a replacement dwelling and related incidental expenses.
- 2. Payments for rental assistance to owners or renters need not necessarily be applied to housing costs. The rental assistance payment must be made in installments. The Grantee has no right to question the use(s) of that payment so long as the household initially occupies a standard unit.
- 3. If a payment must be denied, the Grantee must:

- a. Inform the claimant in writing why the claim is being denied.
 - b. Indicate what assistance is available to bring the current unit up to code (in case of a substandard unit).
 - c. Indicate the ongoing opportunity to qualify for assistance by moving into a standard unit (if the case of moving to a substandard unit is the reason for denying the claim).
 - d. Fully document its efforts to provide payments, the reasons payments were not made, and signed waivers of payment, if possible.
 - e. Fully document its initial notification and all later reminders of the requirement to submit the claim within 18 months of the move (if this is the reason for denying the claim).
4. The claim may be denied for any of the following reasons:
- a. The unit is substandard.
 - b. The move was not completed within one year of the date of removal from the acquired dwelling or the date of receipt of final payment (if owner-occupant), whichever is later.
 - c. Or the claim was not submitted within 18 months of the move.

5. RENT BURDEN AND ECONOMIC DISPLACEMENT INTRODUCTION

- A. **RENT BURDEN** – If a tenant's rent increases as a result of a federally assisted activity, and the rent is more than the tenant can afford, the tenant is "rent burdened".
- 1. Rent Burden is defined differently under various HUD programs. In general, the factors considered are (1) whether the old rent went up and (2) what percentage of income the new rent and utility costs represent.
 - 2. The NHTF program uses the 30% of gross income threshold for tenants whose incomes are above the Section 8 Lower Income Limit and the Section 8 Total Tenant Payment (TTP) as the threshold for tenants at or below the Section 8 Lower Income Limit.
 - 3. TTP is the greatest of 30% of adjusted income or 10% of gross monthly income.
- B. **ECONOMIC DISPLACEMENT** – Occupants who move because their rent went up and they could not be offered a decent, safe, and sanitary, affordable unit within the project, are "economically" displaced, and are due the same relocation considerations as an occupant who is physically displaced.

6. OPTIONAL RELOCATION ASSISTANCE

- A. **TEMPORARY BUT VOLUNTARY DISPLACEMENT** – NHTF funds may be used to provide relocation assistance to persons who are temporarily but voluntarily displaced. The Uniform Act does not mandate benefits to homeowners who participate in the program on a voluntary basis but may be temporarily relocated due to reconstruction of their home.
1. THDA policy allows the Grantee to cover the cost of the moving expenses and a temporary living arrangement with NHTF funds.
 2. The Grantee must include the provision of equal relocation assistance within each class of displaced persons in their written Policies and Procedures, which are available for public review.
- B. Although temporary relocation assistance may be provided to households who are voluntarily displaced during rehabilitation, the Grantee must determine if the lead-hazard reduction work will require relocation for the safety of the household. If it is determined that temporary relocation for occupant safety is required, the Grantee *must* provide this assistance. The cost of relocation is a project soft cost and subject to the subsidy levels. *See Chapter 8, Section 6 - Occupant Protection.*

7. GRIEVANCE PROCEDURES

- A. **APPEALS PROCESS** – The grievance procedure must outline the appeals process contained in 49 CFR Part 24.10. These requirements include:
1. The grounds for filing an appeal
 2. To whom the appeal should be filed
 3. Appropriate time limits, the displaced persons right of appeal to the State, if the complaint cannot be satisfactorily resolved.

8. RECORD KEEPING REQUIREMENTS

- A. **SEPARATE CASE FILES** – Grantees must maintain a separate case file on each displaced person for at least three years after project completion or after receipt of final relocation payment, whichever is later. Each case file must include the following:
1. Record form with:
 - a. Data identifying the parcel and dwelling;
 - b. Number of individuals and family units;
 - c. Family composition (including age, sex, location of employment, source and amount of income);

- d. Veterans status of family members;
- e. Description of current dwelling (number and types of rooms);
- f. Length of time of occupancy;
- g. Amount of housing payment or rent; and
- h. Replacement housing preferences regarding tenure type, location and willingness to increase monthly payments; and other important characteristics (health/disability programs, special needs such as furniture, public assistance, etc.).

- 2. Copy of a Notice of Eligibility or Non-Displacement
- 3. Documentation of suitable replacement housing offered to displacees
- 4. Copy of the 90-Day Notice
- 5. Record of inspection with specified information
- 6. Copy of the 30-Day Notice
- 7. Copy of each relocation claim form and supporting documentation
- 8. Copy of evidence of verification of the claim
- 9. Copy of a cancelled check or other evidence or receipt of payment
- 10. Evidence of receipt of all notices
- 11. Copies of all correspondence related to the claim
- 12. Copies of any appeals made and outcomes and other pertinent data, such as referral of discrimination complaints, etc.
- 13. A summary of the relocation

B. RELOCATION MANAGEMENT CONTROL REPORT – For relocation projects which cover several cases, it is highly recommended that a Residential Relocation Management Control Report be maintained. See <https://www.hud.gov/sites/documents/1378X21CPDH.PDF>.