

City of Tucson
Housing & Community Development Department
GUIDE TO RELOCATION
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GUIDE TO RELOCATION

INTRODUCTION AND OVERVIEW

This guide is intended for -developers utilizing, or proposing to utilize, federal funds in projects that require compliance with the Uniform Relocation Act (URA) promulgated at 49 CFR part 24. Projects requiring URA compliance involve the use of federal financial assistance for acquisition, demolition or rehabilitation. The use of federal financial assistance for the acquisition of real property in and of itself, must comply with all or parts of Subpart B at 49 CFR Part 24.101 depending on whether the acquisition is voluntary or involuntary. URA compliance is also required when federal financial assistance is used in project projects involving demolition or rehabilitation that result in the temporary relocation or permanent displacement of persons. This may include parts of Subpart D and E, beginning at 24.301 and 24.402 respectively.

A URA priority is to minimize displacement. In some instances, projects require that tenants be temporarily relocated or permanently displaced. In those circumstances, the purpose of the URA is to ensure that displaced persons, defined at 24.2(a) (9), receive relocation assistance that is fair, consistent and equitable.

Depending on the source of federal financial assistance and the project activity(ies), the project may also require compliance with Section 104(d) of the Housing and Community Development Act of 1988. This may include the “one-for-one” replacement housing requirement if, as part of the project, housing renting at or below the local fair market rents is demolished or converted to a use other than affordable, rental housing.

Section 104(d) is, in essence, an overlay to the URA. Therefore, projects that require compliance with Section 104(d) must also comply with the URA. The reverse, however, is not the case; projects that require compliance with the URA do not necessarily have to comply with Section 104(d).

The federal requirements for relocation of households or businesses can be extensive and extremely complex. The treatment of relocation in this section will not be exhaustive but will cover the most important issues that must be considered in managing a project involving HOME funds.

While maintaining consistency with the other goals and objectives of the HOME Program, the City, CHDOs and for and non-profit developers must ensure that all reasonable steps to minimize displacement that may occur as a result of a project assisted with HOME funds are taken. In addition to minimizing displacement, residential tenants of dwellings targeted for rehabilitation must be provided a reasonable opportunity to lease and occupy a suitable, decent, safe, sanitary, and affordable dwelling either within that building/complex upon completion of the project or in a comparable building/complex.

A primary focus of this section is ensuring that agencies initiate steps so as to avoid unnecessary relocation costs. Applicable laws, definitions and important terms are discussed, as are the notices and recordkeeping requirements. Key to avoiding unnecessary costs is that tenants receive accurate and timely notification. *Developers must obtain approval of the City*

prior to sending out any notification letters. Examples of notification letters can be found at the HUD Exchange website: <https://www.hudexchange.info/resource/260/guideform-notice-of-eligibility-for-ura-relocation-assistance-residential-tenant/>.

All developers utilizing HOME funds for any portion of a project must work closely with the Project Coordinator and the City's designated relocation coordinator to ensure that relocation is properly handled.

Note:

Planning for a project that requires URA compliance is a key component. An important first step in the planning process is to determine whether the agency has the capacity to administer the URA requirements or, due to the size or complexity of the project, should it hire a relocation consultant.

APPLICABLE FEDERAL REQUIREMENTS

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) [42 U.S.C. 4201-4655] and 49 CFR Part 24.

Acts as the basis for all relocation requirements. Provides definitions of eligible persons, nonprofits, businesses and farms. The Act is implemented through HUD Handbook 1378.

HUD Handbook 1378; Tenant Assistance, Relocation and Real Property Acquisition.

This handbook describes the requirements regarding voluntary and involuntary acquisition as well as relocation requirements of persons, nonprofits, businesses and farms.

Section 104(d), "relocation and one-for-one replacement of housing requirements", 24 CFR, Part 570. Commonly referred to as the Barney Frank Amendment. Section 104(d) applies when HOME, CDBG, Section 108 or UDAG repayments are used in a project that involves the demolition or conversion of affordable rental housing – housing that rents at or below the local fair market rents. Section 104(d) includes two major additions to the URA: (1) Requires that low-income tenants, those with incomes at or below Section 8, are eligible for up to 60 months of replacement housing assistance and (2) that any time an affordable housing unit is demolished or converted to another use, the unit be replaced with a comparable, standard unit that will be affordable for a minimum of ten (10) years.

HOME Rules at 24. CFR Part 206(f) and 24. CFR Part 92.353. HOME funds may be used to pay for relocation-related costs of a HOME-funded project.

CDBG Rules at 24 CFR part 570.606.

RESPONSIBILITIES

The developer must work closely with the City to manage the relocation process. The relocation process begins when a developer and the City enter into negotiations to use federal dollars on a project that *may* involve the acquisition, demolition or rehabilitation of real property and/or result in the displacement of individuals. If people will be displaced, the actual relocation of individuals is only a part of the process. It also requires that displaced persons receive advisory services, notification, moving assistance and, as applicable, replacement housing assistance (based on the formula found at 24.401 for owners and 24.402 for renters. In most instances where owners or tenants are permanently displaced, the Replacement housing of last resort provision at 24.404 may also apply), documenting the assistance and recordkeeping.

Developer/Owner Responsibilities

The developer/owner or agency receiving HOME funds for a project is responsible for the following:

- submitting a relocation plan to the City;
- providing advisory services to the person(s) being relocated;
- sending required notices to persons being relocated *after approval by the City*;
- reviewing each tenant case to determine eligibility for relocation assistance and needs;
- conducting income eligibility certification;
- identifying comparable replacement housing;
- assisting displaced tenants in the selection of new replacement housing;
- calculating relocation payment to be provided based on the formula;
- maintaining complete files and records documenting all relocation activities.

City Responsibilities

The City is responsible for the following:

- approving the relocation plan;
- working with the developer or agency administering the project to determine the applicable relocation laws;
- approving all notices to tenants prior to issuance;
- providing technical assistance and training to developer on relocation procedures;
- providing technical assistance and training to developer on income eligibility certification;
- reviewing income certifications and relocation eligibility determination;
- approving relocation assistance payment calculations;
- inspecting comparable units for compliance with building standards and appropriateness;
- providing information and counseling to tenants as needed;
- monitoring developer for compliance with relocation procedures and requirements and including review of documentation related to the project.

TYPES OF ASSISTANCE

Both temporarily and permanently displaced persons must be provided assistance. The available types of assistance may include:

- payments for actual and reasonable out-of pocket moving and related expenses, for temporary moves;
- various types of replacement housing payments, for both tenants and homeowner occupants;
- moving, re-establishment, and allowance payments for displaced businesses and nonprofit organizations;
- appropriate advisory services, including reasonable advance written notices and one-on-one assistance;
- one-for-one replacement housing as applicable.

DISPLACED PERSON

In order to gain a sense of the extent of relocation and displacement costs, it is necessary to thoroughly understand the definition of the term "displaced person." **All persons and families, individuals, businesses, nonprofit organizations and farms that move permanently as a direct result of rehabilitation, demolition, or acquisition for a HUD-assisted project are entitled to relocation payments and other assistance.** For the purposes of the HOME Program refer to (24 CFR Part 92.353), a displaced person is one who must move as a direct result of a federally-assisted acquisition, demolition, rehabilitation, or construction project. (For URA definition of Displaced Person refer to 49 CFR Part 24.2(a) (9) (i) (A)-(C) Generally, Direct result means the person:

- is required to move from the property for reasons such as the family size cannot be accommodated after rehabilitation, the family does not income qualify, the unit is demolished or its use is changed, or the family's lease is not renewed;
- leaves the property because a decent, safe, sanitary, and affordable unit in the property was not offered;
- leaves the property because of unreasonable temporary relocation requirements or unreasonable terms for permanent moves within the property;
- leaves for any reason AND the necessary notices to insure that the person was fully informed of their rights and assistance were not given or were not given in a timely manner;
- is evicted by the project to evade providing relocation assistance.

Persons not displaced include those who:

- are not required to relocate from the property on a permanent basis (such tenants must receive a Notice of Non-Displacement and temporary relocation assistance as applicable – refer to HUD Handbook 1378 paragraph 1-4 II and paragraph 2-7);
- were evicted for cause in accordance with state and local laws (Refer to 49 CFR Part 24.206);
- have no legal right to occupy the property;
- occupied the property for the purpose of obtaining relocation benefits;
- before leasing and occupying the property but after application for project funding receive written notice (Move-in Notice) of the possibility that displacement or an increase in rent may occur and that relocation assistance will not be provided;
- the City decides (and HUD agrees in writing) the family was not displaced as a direct result of the project;
- for acquisition of life estates, retain the right of use and occupancy of the property following acquisition.

TRIGGERING OF ELIGIBILITY

Initiation of Negotiations (ION)

For HUD-funded project, the Initiation of Negotiations (ION) is generally the date when displaced persons become eligible for relocation assistance. For HOME projects, it is "the execution of the agreement covering the acquisition, demolition or rehabilitation (24.CFR 92.353(c) (3). It is difficult to establish a hard and fast date for eligibility under URA rules; therefore the City has defined the "initiation of negotiations" as the date upon which a conditional commitment of funds is made to the project. This is the starting point for recognition of eligibility. Even though the initiation of negotiations generally sets the date when families become eligible for relocation assistance, relocation concerns must be

addressed much earlier as <u>Before application</u>	displacement may be triggered at any point in the project process. Eligibility of relocation assistance is triggered by a tenant's permanent move if the developer, City, or HUD determines that displacement was a direct result of the project. For example, an owner could displace tenants in order to propose rehabilitation of a vacant building.
<u>After application</u>	Displacement is triggered when a tenant moves permanently from the property because: <ul style="list-style-type: none"> • the tenant is required by the owner to move (including owner refusal to renew the lease); • the owner or developer fails to provide timely written notices to the tenant; or • the owner fails to pay the actual, reasonable out-of-pocket expenses for a temporary move or because the conditions of the temporary move are unreasonable.
<u>After execution of the agreement</u>	Displacement is triggered if a tenant moves permanently from the project because the tenant is not provided the opportunity to lease a suitable, affordable unit in the project.

SECTION 104(D) [BARNEY FRANK AMENDMENT] REQUIREMENTS

HOME assisted projects may also be subject to Barney Frank Amendment Section 104(d) requirements as previously noted, as described in 24 CFR Part 42. The Section 104(d) requirements may be triggered when displacement occurs as a result of demolition or conversion for a HOME project. The primary requirements that may be triggered under Section 104(d) are:

- replacement housing payments of up to 60 months for displaced tenants whose incomes are equal to or below Section 8 and
- replacement of rental housing that is demolished or converted to a use other than housing renting at or below the local fair market rents on a one-for-one basis.

Under this Amendment, the intent of the law is fulfilled only if the City follows its residential anti-displacement and relocation assistance plan. The City's Residential Anti-displacement and Relocation Assistance plan is included in the Consolidated Plan.

RELOCATION PLANNING

Due to the complexities and costs associated with relocation, it is essential to follow a relocation plan that is responsive, timely and reasonable in providing assistance to displaced and temporarily relocated persons. Developers must work closely with the City and their Project Coordinator to plan for relocation notices and procedures.

NOTICES

The publication and distribution of timely notices is critical to avoiding unnecessary relocation costs. Failing to provide correct and timely notices is a common and can be a costly mistake. Accurate and timely recordkeeping is also essential.

By virtue of the URA, each tenant is entitled to timely notice(s) explaining the impact of the proposed project. A tenant who will be permanently displaced must be informed of his or her eligibility for relocation assistance and the nature of that assistance. A tenant who will not be

permanently displaced must be informed of the terms and conditions under which the tenant may occupy the HOME property upon completion of the project.

Different notices serve different purposes and must fit both the specific project circumstances and the individual circumstances of the occupants. While it is sometimes possible to convey all information in one timely notice, most project circumstances dictate the issuance of several notices and possibly information booklets.

The owner is responsible for providing notices to tenants and must obtain the approval of the City's designated relocation coordinator prior to sending out any notices.

General Information Notice (GIN)

Informs occupants of a possible project and of their rights under the URA. This notice must be provided at the time of HOME application or upon initiation of negotiations, whichever comes earlier. Different versions of the GIN are required for persons who will be displaced and for those who will not be displaced. The notice must explain that the project is proposed and caution the person not to move prematurely. The GIN also informs the person of any terms for continued occupancy if the person will not be displaced or of the assistance available if the person will be displaced. If displacement is possible, the notice should enclose additional information about available relocation assistance.

Move-in Notice

Informs households moving into potential projects after the application that they may be displaced and that they will not be entitled to assistance. This notice must be issued to and signed by each prospective tenant BEFORE the tenant agrees to move into the project and must be included as an amendment to the lease agreement. The notice explains the project that has been proposed, informs potential residents that they may be displaced or experience a rent increase as a result and that they will not be entitled to relocation assistance in either event. The tenant must acknowledge the move-in notice in writing. Failure to issue this notice may result in payment of relocation benefits to each potential tenant not provided with the notice.

Developers who have applied for or received a conditional commitment of HOME funds should take this into consideration when entering into a purchase agreement for a property, and should include a requirement that the owner provide or allow for provision of this notice to any new tenants.

Notice of Non-displacement

Informs households, who will remain in the project upon completion, of their rights and the terms and conditions of remaining at the property. The notice contains a specific offer of a suitable, affordable unit in the project and is provided upon the earlier of approval of the HOME application or as soon as the households right to remain is established.

<u>Temporary Relocation Notice</u>	<p>Informs households who will be temporarily relocated of their rights and of the terms and conditions of the temporary move and of returning to the property. Temporary relocatees must receive reasonable advance written notice of the location, terms and conditions of the temporary move and of their right to reimbursement for all reasonable out-of-pocket costs. This notice also includes information regarding the terms and conditions of returning to the unit.</p>
<u>Notice of Eligibility</u>	<p>Informs households who will be displaced of their rights and the levels of assistance available under the URA. This notice must contain a commitment for relocation assistance including addresses of comparable replacement units, and a specified amount for a replacement housing payment and moving expenses. Because comparable rents set an upper limit for assistance, failure to provide information about available, comparable units will likely result in excessive relocation costs. This notice must be provided upon approval of the HOME application or as soon as the households displacement is determined, whichever comes first.</p>
<u>90-Day and 30-Day Notices</u>	<p>Inform displaced household of the day by which they must vacate the property. Each occupant that will be displaced must receive <u>at least 90-days written advance notice</u> before being required to move. The notice cannot be issued prior to issuing a notice of eligibility for assistance OR before notifying of the availability of a comparable replacement dwelling. The notice must specify the date by which the property must be vacated or if the date is unknown, indicate the earliest date the occupant may be required to move. If no date is specified in the 90-day notice, the occupants must be informed that they will receive at least 30 days advance written notice of the specific date of the move. The only exception to a 90-day notice would be those instances where it is impracticable from the standpoint of tenant safety (i.e. health hazard).</p>
<u>Information Booklets</u>	<p>There are three booklets that provide general information regarding relocation benefits. The appropriate booklet should be given to tenants with the General Information Notice.</p> <ol style="list-style-type: none"> 1. <i>Relocation Assistance to Tenants Displaced From Their Homes</i> (HUD-1042-CPD); 2. <i>Relocation Assistance to Displaced Homeowners</i> (HUD-1044-CPD); and 3. <i>Relocation Assistance to Displaced Businesses, Nonprofit Organizations and Farms</i> (HUD-1043-CPD).
<u>Waiver</u>	<p>Generally, relocation rights cannot be waived and displacing agencies must not coerce displaced tenants to sign a waiver. However, for families that can be offered a decent, safe, and sanitary unit in the project that is <u>not</u> affordable may be offered an opportunity to waive relocation assistance and remain in the project.</p>

Notice Timeline

The following timeline reflects the timing of notices and to whom they should be issued.

TENANT	People who moved earlier	In-place Tenants	Move-Ins	In-place Tenants	In-place Tenants
DATE	APPLICATION		AGREEMENT		PROJECT COMPLETION
REQUIRED NOTICE	General Information Notice (GIN) "Don't move now!"		Move-In Notice	Temporary Relocation Notice OR Notice of Non-displacement OR Notice of Eligibility	90- or 30-day Vacate Notice One-year lease at affordable rate. Future rent increases must reflect market increases to avoid economic displacement

Serving Notice

Notices are typically issued by the owner with the City's approval. In any event, the owner is ultimately responsible and must insure that timely and correct notices are given. Notices must be personally served or sent by certified or registered first-class mail, return receipt requested. If delivering notices personally, the tenant should be required to sign that they have received the notice.

If the project will not result in rent increases or in any temporary or permanent relocation, the general information notice and notice of non-displacement may be posted in an accessible location and should also be provided to a tenant representative.

INFORMATION AND COUNSELING

All residents must be kept informed of project activities and scheduling. Information and counseling should also include referrals to available assistance and human services, information about federal, state, and local housing programs, and information about household rights under the Fair Housing Act.

RIGHTS OF RESIDENTS WHO REMAIN IN THE PROJECT

Remaining households must be offered a suitable unit that is affordable. Determining which tenants will be able to remain in the project is a key component in evaluating the feasibility of an occupied project. In general, if there is no increase in rent, the unit is considered affordable even if the percentage of income the family is paying is already high. If rents increase as a result of the project, the ability of each household to afford the new rent must be determined.

An affordable rent is a gross rent (rent paid to the owner plus an estimate of utilities paid by the tenant) that does not exceed 30% of adjusted monthly income or 10% of gross monthly income as calculated under Section 8 income certification rules. If the proposed rent represents an increase, and the rent exceeds the affordable rent, the household is considered rent burdened. Rent burdened families can be offered tenant-based subsidy such as a Section 8 certificate/voucher or the owner can elect to limit rent increases for units occupied by rent burdened families. If neither of these options is feasible, the family is "economically" displaced and must be provided a notice of eligibility for relocation assistance.

Remaining households should be offered a new one-year lease upon completion of the project (owners and tenants may agree to complete the term of a current lease). Any increase in rent caused by the project should be reflected at the time the new lease is offered. Subsequent rent increases must reflect market conditions - not the cost of acquiring and rehabilitating or constructing the property. An owner may not keep rents artificially low for a short period following project completion and then raise rents dramatically to reflect the cost of the project or its increased value. If this occurs, the tenant may claim economic displacement.

TEMPORARY RELOCATION

Multi-Family (Rental) Residents who will remain in the project after rehabilitation may be required to move temporarily during the course of the project. Temporary units must be suitable and decent, safe and sanitary but not necessarily comparable. In addition to a notice of non-displacement, the resident must receive reasonable advance written notice of the date and approximate duration of the planned temporary move, information about the terms and conditions under which the tenant will be returning to the original unit, and reimbursement of all reasonable out-of-pocket expenses incurred in conjunction with the move, including any increase in monthly rent or utility costs.

Single-Family (Owner) Like tenants of a rental project, owners of units to be rehabilitated with HOME funds may be required to move temporarily. Temporary units must be suitable and decent, safe and sanitary but need not be comparable to the owner's home. Owners may be temporarily placed in motel rooms. All owners temporarily relocated are entitled to reimbursement of reasonable out-of-pocket expenses incurred in conjunction with the time being away from their unit.

Tenants or owners may elect to stay temporarily with friends or relatives. This election is strictly voluntary. Tenants and owners may not be coerced or led into staying with others. Tenants or owners electing to stay with friends or relatives must sign a written statement indicating they have voluntarily made this election and indicating they are aware they are not entitled to living expenses incurred in conjunction with this election.

PERMANENT MOVES WITHIN THE PROJECT

Tenants may be allowed to remain in the project but not in the same unit. Permanent moves within the same project must be to suitable, decent, safe and sanitary, but not necessarily comparable, units. In addition to the notice of non-displacement, the resident must receive reasonable advance written notice of the date of the planned move to an alternate unit and reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move. The rent plus utilities of the permanent new unit within the project must be "affordable."

COMPARABLE UNITS

A comparable unit is a specific unit that is similar in size, function, and location to the unit the household is leaving and that is offered to a displaced household. Tenants who are displaced must be referred to at least one comparable unit to assure that the displaced persons actually have a place to go and to set a limit on the maximum liability for replacement housing payments. Replacement housing payments are based upon the cost of the household's replacement unit or the cost of the comparable unit, whichever is lower.

In general, comparable units:

- are similar in size as they generally will have the same amount of space as the original unit and will have similar improvements and amenities. If the original unit was dilapidated, a smaller, decent, safe, and sanitary unit, adequate in size to accommodate the household, may be considered comparable;
- are similar in function as they generally perform the same service or purpose as the original unit. For example, if the original unit was an SRO, the replacement unit could also be an SRO with functionally equivalent eating, sleeping, and bathing facilities;
- contain the same principle features. For example, if the original unit had a separate dining and living room and the replacement unit combines the dining and living rooms to accommodate the same activities, the replacement unit is functionally equivalent to the original unit;
- are reasonably accessible to the person's employment;
- are located in an equal or better area as pertains to public utilities and commercial and public facilities. The comparable unit location should be no less desirable than the displacement location and provide access to work, services, and facilities. Example 1-- a displaced family wishing to keep their school-age children in the same school, should be provided comparable units within the same school district. Example 2 -- a household is dependent upon public transportation to get to work, this household should be provided a comparable unit with similar access (time and cost) to employment. Example 3 -- a household is offered a comparable unit that, unlike the current unit, is located in a higher-crime area. This unit is not comparable despite its size and function being similar to the original unit;
- are currently available to the displaced person. The unit is available if it is vacant, the person has been informed of the location and has sufficient time to negotiate an agreement to lease or purchase, and the person receives relocation payments in sufficient time to complete the move or purchase;
- are decent, safe and sanitary according to Section 8 Housing Quality Standards;
- are within the financial means of the displaced household;
- are similar in type to the original unit (project-based subsidized housing for those vacating subsidized housing, etc).

BUSINESS RELOCATION

Business relocation is also covered by the URA and includes for-profit businesses, non-profit organizations, and farms. To qualify for business relocation assistance, the business must move permanently as a direct result of the acquisition, rehabilitation, or demolition of the property for a HOME-assisted project. All displaced businesses are eligible for relocation assistance based on size (number of employees), type of operation, and contribution to the owner's income.

Business relocation requirements are complex, therefore more negotiations are required than for residential relocation. Good preparation and record keeping are essential. Payment of moving and related expenses and re-establishment expenses may be in the form of either reimbursement of actual, reasonable moving and related costs, OR a fixed, lump sum payment. For this reason, estimates of moving expenses and replacement site costs must be made in advance rather than allowing business owners to independently make such determinations. In addition to moving assistance, displaced businesses may also be entitled to site search and reestablishment cost up to \$2,500 and \$10,000 respectively. There is no ceiling on moving

costs. Note: efforts are underway to increase the amounts available for site search and reestablishment expenses.

RECORDKEEPING REQUIREMENTS

Good recordkeeping, including a record of all contacts with displaced or potentially displaced persons, is necessary to demonstrate properly executed policies.

Record Retention

Records covering displacement and acquisition activities must be retained for at least five years after the date by which all persons have received the final payment to which they are entitled.

List of Occupants

For each project, a list or lists identifying the name and address of:

- all persons occupying the real property at the beginning of the project. Generally, this is the date of the initial submission of the HOME application. In limited instances, if site control is not obtained until after submission of the application, the date of site control may be considered the beginning of the project;
- all persons moving into the property on or after the date on which the project begins, but before completion of the project;
- all persons occupying the property upon completion of the project.

The lists should be maintained in a suitable computer generated format that also indicates, for project management purposes, progress made in completing the HOME project.

Tenants Not Displaced

Documentation on tenants not permanently displaced must include:

- evidence that the tenant received timely written notice that he or she would not be displaced by the project;
- for a tenant-occupant of a dwelling, evidence that the tenant received:
 - a timely offer of an opportunity to lease and occupy a suitable, affordable, decent, safe and sanitary dwelling in the building/complex upon completion of the project under reasonable terms and conditions;
- reimbursement of any out-of-pocket expenses incurred in connection with any temporary relocation or a move to another unit in the building/complex.

For each tenant who is not involuntarily displaced but who elects to relocate permanently:

- an indication of the reason for the move and any personal contact to explain available alternatives, and written notice to the tenant that he/she will not qualify for relocation payments as a displaced person;
- this information must be available for all tenants who occupied the property before project completion, but did not occupy the property after project completion and did not receive relocation assistance as a displaced person;
- racial/ethnic/gender identification as required by section 562 of the Housing and Community Development Act of 1987 and section 808(e)(6) of the Fair Housing Act;
- a copy of any appeal or complaint filed and the recipient's response to the appeal or complaint.

Displaced Persons

For each person permanently displaced, a case file that includes:

- identification of the person's name, address, racial/ethnic group classification and date of initial occupancy;
- for residential tenant-occupants, age, sex, and income of all members of the household, and monthly utility costs for the displacement dwelling;
- for homeowners, the acquisition cost of the unit;
- for nonresidential occupants, the type of business enterprise (i.e. farm, nonprofit corp.);
- evidence that the tenant received early written notice of the possible displacement including a general description of relocation payments and advisory services for which the tenant may be eligible, basic eligibility conditions, and procedures for obtaining payments;
- evidence that the tenant received timely written notice of eligibility for relocation assistance and, for those tenants displaced from a dwelling, referrals to specific comparable replacement dwellings, and the method used to establish the amount of the replacement housing payment;
- identification of the displaced tenant's relocation needs and preferences, dates of personal contacts, and services provided;
- copy of the 90-day notice and vacate notice, if issued;
- identification of referrals to replacement properties, date of referral, rent/utility costs or sale price (if a dwelling), date of availability, and reason(s) person declined referral;
- identification (address) of actual replacement property, rent/utility costs or sale price (if a dwelling) and date of relocation;
- copy of replacement dwelling inspection report showing condition of unit and date of inspection;
- copy of each approved claim form and related documentation, evidence that the person received payment and, if applicable, Section 8 Housing Choice Voucher and
- copy of any appeal or complaint filed and the recipient response to the appeal or complaint.