

PENNSYLVANIA HOUSING FINANCE AGENCY

ANTIDISPLACEMENT AND RELOCATION ASSISTANCE PLAN

Dated: July 25, 2018

REQUIREMENTS FOR FEDERALLY FINANCIALLY ASSISTED PROJECTS

This Plan provides an overview of the requirements under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (“URA”) and Section 104(d) of the Housing and Community Development Act of 1974 (“Section 104(d)”). The URA protects all persons displaced by a federally-assisted project – regardless of their income. Relocation requirements found in Section 104(d) focus on displaced low- and moderate-income residential occupants and the loss of those units (both rental and owner occupied) within a community through demolition or conversion of residential housing or mixed use properties.

These requirements are triggered for all projects seeking federal funding, such as federal HOME funds or federal Housing Trust Fund assistance from PHFA. Federal assistance from other entities may also trigger these, and in some cases, additional requirements. Consult directly with other funding sources, such as local redevelopment agencies and public housing authorities for explicit applicable guidance in using CDBG or public housing dollars. All applicants are advised that the antidisplacement and relocation assistance protocols discussed in this Plan are applicable as soon in the project development process as an applicant has identified they may apply for federal funds from PHFA. Failure to follow them may result in added expenses or in disqualification from the programs.

Applicants should thoroughly review this Plan and consult specific HUD guidance found in the [Tenant Assistance, Relocation and Real Property Acquisition Handbook \(1378.0\)](#), HUD regulations and any applicable program-specific guidance on acquisition and relocation.

PHFA expects all applicants to prepare a detailed plan outlining all steps to be taken, including notices to be provided, and all sequential actions required. This plan must follow all of the guidance referenced in this document and must be submitted to the Agency no later than the date an application is submitted for federal funding.

I. General URA Requirements

The following is a list of important definitions under the URA and Section 104(d). This list is meant to help understand this Plan but is not exhaustive and program applicants should consult program-specific guidance for additional details.

a. Key Definitions

- **“Displaced Person”** means any person (residential and non-residential tenants and owner occupants) that move from the real property or moves his or her personal property from the real property, as a direct result of:
 - The acquisition or written notice of intent to acquire, the initiation of negotiations for, or the acquisition of, such real property in whole or in part for a project;
 - Rehabilitation or demolition for a project; or
 - A written notice of intent to acquire, or the acquisition, rehabilitation or demolition of, in whole or in part, other real property on which the person conducts a business or farm operation, for a project. *Eligibility for a person under this paragraph applies only for purposes of obtaining relocation assistance.*

- **“Persons not displaced”** includes but is not limited to a person who:
 - Moves before initiation of negotiations, unless it is determined that the person was displaced as a direct result of the program or project;
 - Initially enters into occupancy of the property after the date of its acquisition for the project;
 - Has occupied the property for the purpose of obtaining assistance under the URA;
 - Is not required to relocate permanently as a direct result of a project;
 - Is an owner-occupant who moves as a result of acquisition of real property as described in §§ 24.101(a)(2) or 24.101(b)(1) or (2), or as a result of the rehabilitation or demolition of the real property. *The displacement of a tenant as a direct result of any acquisition, rehabilitation or demolition for a Federal or federally-assisted project is subject to the requirements of the URA;*
 - Retains the right of use and occupancy of the real property for life following its acquisition;
 - Is determined to be in unlawful occupancy prior to or after the initial negotiations or a person who has been evicted for cause, under applicable law;
 - Is not lawfully present in the United States and has been determined to be ineligible for relocation assistance in the accordance with § 24.208.

If there are questions about whether a person is considered displaced or not, please contact your [HUD Regional Relocation Specialist](#) – Michael C. Szupper (michael.szupper@hud.gov or 215.861.7669)

- **“Project”** is defined as an activity or series of activities undertaken by a federal agency or with federal financial assistance received or anticipated in any phase of any undertaking.
- **“Initiation of Negotiations” (ION)** serves as a milestone in determining a person’s eligibility for relocation assistance, including moving costs and a replacement housing payment. The ION is also the trigger for issuance of the Notice of Eligibility for Relocation Assistance or Notice of Nondisplacement (as further explained herein). After the ION, any applicant who seeks to rent in the project must be issued a move-in notice before executing a lease; otherwise the project will incur liability for relocation costs if the applicants are found to be eligible as displaced persons.
 - **Under HOME/HTF Program** – to a tenant displaced as a result of a private-owner rehabilitation, demolition or acquisition, the execution of the agreement covering the rehabilitation, demolition or acquisition – for purposes of PHFA programs, this is the Agency Commitment Letter.
- **“Move-In Notice”** is a written notice provided to a person who is interested in moving into a project after the date an application for federal financing assistance (such as PennHOMES or HTF) was submitted. If the person is provided with such a notice before leasing and occupying the property and agrees to occupy the property under the terms

of the notice, the person is not eligible for relocation assistance. The notice must contain the following information: (1) that an application for federal assistance for the project has been submitted, (2) the project's possible impact on the person (e.g., the person may be displaced, temporarily relocated or suffer a rent increase) and (3) the fact that he or she would not qualify for relocation assistance as a "displaced person" as a result of the project, if he or she chose to occupy the property. A sample Movie-In Notice is attached as **Appendix 1**.

- **"Comparable Replacement Dwelling"** means
 - A decent, safe and sanitary unit according to local housing and occupancy codes (including being lead-based paint safe). The dwelling shall be structurally sound, contain safe wiring system, contain a heating system that can maintain a healthful temperature, be adequate in size, include a separate well-lighted bathroom, include unobstructed egress and for persons with a disability, be free of barriers;
 - Functionally equivalent to the displacement dwelling unit;
 - Adequate in size to accommodate the occupants;
 - In a location generally not subject to unreasonable adverse environmental conditions;
 - In a location not less desirable than the location of the person's displacement dwelling unit with respect to public utilities, and commercial and public facilities, and reasonably accessible to the person's place of employment;
 - On a site that is typical in size for residential development with normal site improvements;
 - Currently available to the displaced person on the private market; and
 - Within financial means of the displaced person.

If a person received federal government housing assistance before displacement, the comparable replacement dwelling unit may reflect similar government housing assistance. In these cases, the requirements of the federal government program related to the household's unit size shall apply.

b. Relocation

- **Step One: Project Planning**

PHFA requires that all reasonable steps are taken to minimize displacement of existing residents and potential beneficiaries of a proposed project receiving federal financing. Efforts should be made early in the planning phase of project development to ensure that sufficient funds are budgeted to comply with applicable laws and regulations.

Resource considerations to keep in mind include: (1) replacement housing based on the number of households to be displaced, owner or tenant occupancy, resident income, purchase or rental cost and utility cost; family characteristics; impact on minorities, the elderly, large families, and persons with disabilities, (2) replacement business locations based on the number, type and size of businesses, farms and/or non-profit organizations to be displaced (if any), (3) the need for providing ongoing advisory services to displaced persons and (4) the need (if any)

for advisory services to other persons in the neighborhood that will be adversely impacted by the project and who may be eligible assistance. Development of the Plan should take into consideration all requirements and should follow all of the steps outlined in the URA. A flowchart which may be helpful is attached as **Appendix 2**.

Steps should be taken to ensure cooperation and coordination among government agencies, neighborhood groups and affected persons so that the project can proceed efficiently with minimal duplication of effort.

While not mandatory, it may be advantageous for applicants to consult with the occupants of any site to be acquired, rehabilitated or demolished at an early stage. When public meetings are held, the meeting room and presentation must be accessible and understandable to all persons in the intended audience, regardless of disability or limited English language proficiency.

To the extent it is necessary and feasible an on-site survey of occupants should be conducted to obtain occupant information about replacement housing preferences. A sample occupant survey is attached as **Appendix 3**.

- **Step Two: Submit Antidisplacement and Relocation Plan to PHFA**
 - The Plan shall clearly indicate the steps that will be taken consistent with the requirements of the URA, Section 104(d) and those provided herein, to minimize the displacement of families and individuals from their homes and neighborhoods as a result of the project. The Plan should outline the sequence of all necessary notices and the actions that will be followed.
 - The Plan must be submitted to both the project's Development Officer and the Compliance Officer.

- **Step Three: Relocation Notices**
 - **General Information Notice (GIN)** – The URA regulations require that persons who are scheduled to be displaced must be provided with a GIN as soon as feasible. To minimize unintended displacements, HUD policy requires all occupants within a proposed federally-assisted project involving acquisition, rehabilitation or demolition as scheduled to be displaced for purposes of issuing a GIN. For those persons who will not be displaced, the GIN should be modified to explain that the project has been proposed, they will not be displaced, and caution the person not to move (complete with an explanation of the ramifications of moving on his/her own). Sample General Information Notices are attached as **Appendices 4, 5, 6 and 7**.

 - **Notice of Relocation Eligibility (NOE)** – The NOE must be issued promptly after the ION and must describe the available relocation assistance, the estimated amount of assistance based on the displaced person's individual circumstances and needs and the procedures for obtaining the assistance. The NOE must be specific to the person and their situation so they have a clear

understanding of the type and amount of payments and/or assistance they may be entitled to receive. Applicants must tailor these notices for the specific project. Sample NOE are attached as **Appendices 8 and 9**.

- **Notice of Nondisplacement** – This is a notice provided to persons who will not be permanently displaced for a federally-assisted project. Such persons may, however, be required to move to another unit within the project or relocate temporarily while the property is rehabilitated (terms of the move must be reasonable and costs for the move must be covered by the project). While this notice is not required by the URA, HUD policy requires such notice be provided to adequately inform those persons within the project who will not be permanently displaced but who may be impacted as a result of the project. A person who will not be displaced by the project may choose to lease; however, they are presumed to be ineligible for relocation payments if an accurate and timely Notice of Nondisplacement was provided before they chose to move. A sample Notice of Nondisplacement is attached as **Appendix 10**.

- **Ninety-Day Notice** – No lawful occupant shall be required to move unless he or she has received **at least** 90 days advance written notice of the earliest date by which he or she may be required to move. This notice may be issued 90 days or earlier before it is expected the person will be displaced but shall not be given before the displaced person is issued a Notice of Relocation Eligibility (or notice of ineligibility) for relocation assistance. The Ninety-Day Notice shall either state a specific date as the earliest day by which the occupant may be required to move, or state that the occupant will receive a further notice indicating, at least 30 days in advance, the specific date by which he or she must move. If the Ninety-Day Notice is issued before a comparable replacement dwelling is made available, the notice must clearly state that the occupant will not have to move earlier than 90 days after such dwelling is made available.
 - If tenants will be temporarily relocated but not displaced, HUD recommends providing a minimum of 30 days' notice to move. Longer notice may be appropriate for persons who will be relocated for an extended period of time (more than 6 months) or if the move will include all personal property on site. Shorter notice periods may be appropriate based on an urgent need due to danger, health or safety issues or if the person will be temporarily relocated for only a short period of time.
 - Where time to begin work on the project is critical, HUD policy permits a **NOE and a 90-day Notice to be combined into one notice** and issued on or before the Initiation of Negotiations (e.g., where moving tenants before snowfall will enable the project to move forward with roof replacements). All persons must still be provided with a minimum of 90 days notice prior to requiring that they move, unless the following conditions are met:
 - In unusual circumstances, an occupant may be required to vacate the property **on less than 90 days advance written notice** if it is

determined that a 90-day notice is impracticable, such as when the person's continued occupancy of the property would constitute a substantial danger to health or safety. A copy of this determination shall be saved in the applicable project file.

- **Notice of Intent to Acquire** – A Notice of Intent to Acquire is the written communication that is provided to a person to be displaced, including those to be displaced by rehabilitation or demolition activities from property acquired prior to the commitment of federal financial assistance. A Notice of Intent to Acquire establishes eligibility for relocation assistance prior to the initiation of negotiations and/or prior to the commitment of federal financial assistance.

All Notices shall be written in plain, understandable language. Persons who are unable to read and understand the notice must be provided with appropriate translation or interpretation services in accordance with HUD limited English proficiency guidance, alternative formats and/or counseling. Each notice shall indicate the name and telephone number of a person who may be contacted for answers to questions or other needed help.

All Notices must be tailored to the specific circumstances of the affected persons.

If a project will not result in a rent increase, or require permanent or temporary relocation, a General Information Notice or Notice of Nondisplacement may be served by posting in accessible locations and providing a copy to the tenant or his or her representative.

- **Step Four: Provide Relocation Advisory Services and Payments**

- **Relocation Advisory Services** – Relocation advisory services must satisfy the requirements of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 and Executive Order 11063 in addition to providing the services described below:
 - For residential displacements, determine the relocation needs and preferences of each person to be displaced and explain the relocation payments and other assistance for which the person may be eligible, the related eligibility requirements and the procedures for obtaining such assistance.

➡ **This must include a personal interview with each residential displaced person.**

- Provide current and continuing information on the availability, purchase prices and rental costs of comparable replacement dwellings and explain that the person cannot be required to move unless at least one comparable replacement dwelling is made available.
- As soon as feasible, inform the person, in writing, of the specific comparable replacement dwelling and the price or rent used for establishing the upper limit of the replacement housing payment and the basis for the determination so that the person is aware of the maximum replacement housing payment for which he or she may qualify.

- Where feasible, replacement housing shall be inspected prior to being made available to assure that it meets applicable standards. If such inspection is not made, the person shall be notified that a replacement housing payment may not be made unless the replacement dwelling is subsequently inspected and determined to be decent, safe and sanitary.
 - Whenever possible, actions should be taken to affirmatively further fair housing efforts to deconcentrate poverty and minority concentration. Accordingly, minority persons shall be given reasonable opportunities to relocate to comparable replacement dwellings not located in an area of minority concentration that are within their financial means. This policy, however, does not require the person be paid a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling.
 - Transportation should be offered so individuals may inspect the housing to which they are referred.
 - Any displaced person who may be eligible for government housing assistance at that replacement dwelling shall be advised of any requirements of such government assistance program that would limit the size of the replacement dwelling as well as the duration of such rent subsidy and the limited duration of the relocation rental assistance.
 - Provide, for nonresidential moves, current and continuing information on the availability, purchase prices and rental costs of suitable commercial and farm properties and locations. Assist any person displaced from a business or farm operation to obtain and become established in a suitable replacement location.
 - Minimize hardships to persons in adjusting to relocation by providing counseling, advice as to other sources of assistance that may be available and other help as may be appropriate.
 - Supply persons to be displaced with appropriate information concerning federal and state housing programs, disaster loan and other programs as well as technical help to persons applying for such assistance. Resources can be found at: <http://www.pahousingsearch.com/>
 - Relocation activities shall be coordinated with project work and other displacement-causing activities to ensure that, to the extent feasible, persons displaced receive consistent treatment and the duplication of functions is minimized.
 - When occupancy of an affected unit began subsequent to acquisition and the occupancy is permitted by a short term rental agreement or an agreement subject to termination when the property is needed for a program or project, the occupant shall be eligible for advisory services.
- **Moving Expenses** – Any displaced residential owner-occupant or tenant-occupant who qualifies as a displaced person under URA is entitled to a payment for his or her reasonable moving and related expenses.

➡ **Generally, the displaced person may choose a payment for actual reasonable moving and related expenses or a fixed payment for moving expenses.**

- **Commercial move** – a displaced person may, at his or her discretion, choose to hire a professional commercial mover based on the lower of two bids or estimates prepared by two different commercial movers. Payment for a low cost or uncomplicated move may be based on a single bid or estimate.
- **Actual Expenses** – As an alternative to hiring a professional commercial mover, the displaced person may choose to be reimbursed for actual moving expenses. Actual moving expenses must be reasonable.
 - Eligible expenses include the following:
 - Transportation of the displaced persons and personal property (**transportation costs for a distance beyond 50 miles are not eligible, unless determined by project owner that relocation beyond 50 miles is justified**);
 - Packing, crating, uncrating and unpacking of personal property;
 - Storage of the personal property for a period not to exceed 12 months (**unless it is determined a longer period is necessary**);
 - Disconnecting, dismantling, removing, reassembling and reinstalling relocated household appliances and other personal property;
 - Insurance for the replacement value of the property in connection with the move and necessary storage;
 - Credit checks;
 - The replacement value of property lost, stolen or damaged in the process of moving (not through the fault or negligence of the displaced person, his or her agent or employee) where insurance covering such loss, theft or damage is not reasonably available;
 - Utility hook-ups, including reinstallation of telephone and cable services; and
 - Other costs as determined to be reasonable and necessary.
 - Ineligible expenses include:
 - Interest on a loan to cover moving expenses;
 - Personal injury;
 - Any legal fee or other cost for preparing a claim for relocation payment or for representing the claimant;
 - The cost of moving any structure or other real property improvement in which the displaced person reserved ownership;

- Refundable security or utility deposits; and
 - Costs for storage of personal property on real property owned or leased by the displaced person before the initiation of negotiations related to the displacement and relocation.
- Payment may also be calculated using a **fixed residential moving cost** schedule described in § 24.302.
- **Relocation Housing Payments** – A tenant displaced from a dwelling is entitled to a replacement housing payment if the individual:
 - Has actually and lawfully occupied the displacement dwelling for at least 90 days immediately prior to the initiations of negotiations; and
 - Has rented, or purchased and occupied a decent, safe and sanitary replacement dwelling within one year after the date he or she moves from the displacement dwelling.

The URA establishes maximum payment standards and these should be checked by the project owner. However, the regulations also require that persons receive the full amount needed to enable them to afford their replacement dwelling unit. Occupants are entitled to the full 42 months of assistance.

HUD updates the low income limits used in connection with rental assistance payment calculations and the project owner should make sure to check the [HUD Website](#) when calculating these amounts.

- **Purchase Assistance**
 - Cash rental assistance must be provided in installments, unless the occupant wishes to purchase a home. If the displaced occupant wished to purchase a home, the payment must be provided in a lump sum so that the funds can be used for a down payment. The amount of cash rental assistance to be provided is based on a one-time calculation. The payment is not adjusted to reflect subsequent changes in an occupant's income, rent/utility costs or family size.
- **Housing Voucher**
 - PHFA encourages project owners to contact the local housing authority regarding housing vouchers. If available, it is the tenant's decision whether he or she wishes to take the voucher rather than cash assistance. If the occupant is provided a housing voucher and the rent/utility cost for a replacement dwelling unit (actual or comparable replacement dwelling unit, whichever is less costly) exceeds the payment standard, the tenant will qualify for cash rental assistance in addition to the housing voucher assistance to cover the gap.

c. Acquisition

The URA applies to any acquisition of real property for programs and projects where there are federal funds, such as HOME, federal Housing Trust Funds, or other federal financing (CDBG, Section 108, RAD, etc.) used for any part of the project costs. Real property includes the following:

- Permanent and temporary easements necessary for the property;
- Fee simple title/a parcel of land;
- Long-term leases of 50 years or more; and
- Rights of way.

If federal funds are used to fund any part of the project, the URA governs the acquisition of real property for the project and any resulting displacement, even if other funding is used to pay acquisition costs. PHFA will monitor URA compliance for all project applicants seeking federal funding from PHFA, such as PennHOMES and HTF. Other funding agencies, such as local housing and redevelopment authorities or city and county offices may have additional requirements associated with their federal funding programs.

All real property acquisition activities must be accurately identified at application submission or with any modification submission.

- **Step One: Determine Ownership**
 - The first step in the process is to obtain title evidence, that is, the deed and the legal description of the property. Review the county register of deeds' records to determine the actual property owner and review the deed and legal description of the property to determine any existing easements or liens. A title search to determine ownership is often necessary.
- **Step Two: Determine the Value of the Property**
 - Under the URA, a voluntary acquisition does not require a formal appraisal to determine the property's value. However, if federal dollars will be funding the acquisition of the real property, an appraisal may be required to verify cost reasonableness. PHFA requires appraisals to support project costs in almost all circumstances. In the unusual circumstance where PHFA agrees to consider costs without requiring an actual appraisal, a waiver valuation must be prepared. Such a waiver valuation methodology is subject to preapproval by PHFA. A waiver valuation is a statement of property's value. The waiver valuation does not need to be complicated but must include: (1) the property to be acquired, (2) a description of the property, (3) the method used to determine the property's value, (4) the estimated market value of the property, (5) the name of the person making the valuation, and (6) any other notes or conditions applicable to the analysis. The person performing the waiver valuation must have a sufficient understanding of appraisal principles and the local real estate market. The waiver valuation or similar documents must be maintained in the project file.
 - Before the initiation of negotiations, the buyer must establish an amount which it believes is just compensation for the real property. The amount shall not be less

than the approved appraisal of the fair market value of the property, taking into account the value of allowable damages or benefits to any remaining property.

- **Step Three: Send Voluntary Acquisition Notice**

- A voluntary Acquisition Notice must be sent to property owners. The Notice must include the market value of the property, justifications of stated value and the identification of the buildings, structures and other improvements (including removable building equipment and trade fixtures) which are included as part of the offer of just compensation. Where appropriate, the statement shall identify any other separately held ownership interest in the property (e.g., a tenant-owned improvement) and indicate that such interest is not covered by this offer).
- A statement must be included affirming that the buyer does not have the power of eminent domain. The buyer must send all notices, letters and other documents by certified or registered mail, return receipt requested, or hand delivered with receipt documented. If the property owner does not read or understand English, the buyer must provide translation services and assistance. Each notice must give the name and telephone number of a person who may be contacted for further information.
- This notice should also inform the property owner that he or she is not entitled to any relocation assistance. Note, however, that if the property is tenant-occupied and the tenant will be required to vacate, the tenant is eligible for relocation assistance.
- A sample Voluntary Acquisition Notice is attached as **Appendix 11**.

- **Step Four: Negotiate, Prepare Documents and Complete the Sale**

- Buyer shall make every reasonable effort to acquire the real property expeditiously by negotiation. Following successful negotiations, prepare the sales contract, the Statement of Settlement Costs (HUD Form 1) or similar document. Complete closing, transfer and record the deed.

II. Section 104(d) Requirements

a. General Requirements

Under Section 104(d) of the Housing and Community Development Act of 1974, as amended and the implementing regulations at 24 CFR part 42, a residential antidisplacement and relocation assistance plan must provide for: (1) one-for-one replacement of occupied and vacant, able to be occupied, low- and moderate-income dwelling units demolished or converted to another use in connection with a development project receiving federal assistance and (2) provide relocation assistance for all low- and moderate-income persons who occupied housing that is demolished or converted to a use other than for low- or moderate-income housing.

b. Relocation Assistance

- A displaced lower-income tenant may choose either assistance at URA levels or assistance available under Section 104(d).

- **Moving Expenses**

- Under Section 104(d), each displaced person is entitled to the URA moving expenses and the following additional relocation expenses:
 - Security Deposits – the reasonable and necessary cost of any security deposit required to rent the replacement dwelling unit; and
 - Interim living costs – the occupant shall be reimbursed for actual reasonable out-of-pocket costs incurred in connection with temporary relocation, including moving expenses and increased housing costs, if the occupant must relocate temporarily because continued occupancy of the dwelling unit constitutes a substantial danger to the health or safety of the occupant or the public.

- **Relocation Housing Payment**

- Section 104(d) relocation housing payments are intended to provide affordable housing for a 60-month period. There is no cap on Section 104(d) relocation housing payments. Housing payment standards may occasionally be updated by HUD and project owners should consult the [HUD Website](#) for updates.
 - During this period the payment makes up the difference between:
 - The rent and utility costs for the replacement dwelling unit (or comparable unit); and
 - The tenant's total payment.
 - The **tenant's total payment** is the highest of:
 - 30 percent of the tenant's monthly adjusted income;
 - Adjusted income means the tenant's annual income after making deductions.
 - 10 percent of the tenant's monthly gross income; and
 - The designated allowance for rent/utility costs if the person is receiving welfare assistance from a public agency and a part of such assistance is specifically designated for the person's rent and utility costs.
- All or a portion of this rental assistance may be offered (if it is available) through a housing voucher for rental assistance provided through the local housing authority. PHFA does not administer vouchers but encourages all project applicants to contact their local housing authority to determine if this assistance may be available to affected households.
- Whenever a voucher is offered, referrals should be made to comparable replacement dwelling units where the owner is willing to participate in the voucher program. If a person is offered a voucher and appropriate housing referrals, but refuses such assistance or rents and moves to a unit where he or she is unable to receive the voucher assistance, the Section 104(d) replacement housing requirements are satisfied. **In such case, the displaced person may be eligible for replacement housing assistance calculated at URA levels.**
- If the tenant is provided a voucher and the rent/utility cost for a replacement dwelling (actual or comparable replacement dwelling, whichever is less costly)

exceeds the voucher payment standard, the tenant may qualify for cash rental assistance in addition to the voucher assistance to cover the gap.

- **Purchase Assistance**

- Purchase assistance under Section 104(d) is limited by statute to securing participation in a housing cooperative or mutual housing association. In many cases, it will be to a potential homebuyer's advantage to use purchase assistance available under the URA (rather than Section 104(d)) in order to have more housing options available.
- This payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the total tenant payment from the monthly rent and estimated average monthly cost of utilities for a comparable

See the [HUD Handbook](#) for a summary of the major differences between the URA and Section 104(d) relocation assistance for displaced residential tenants.

III. Recordkeeping Requirements

All pertinent records shall be retained for the period specified in the applicable program regulations or until PHFA has completed its monitoring, but not less than three (3) years after the later of:

- The date by which all payments have been received by persons displaced for the project and all payments for the acquisition of the real property have been received;
- The date the project has been completed and placed in service;
- The date by which all issues resulting from litigation, negotiation, audit or other action (e.g., civil rights compliance) have been resolved and final action taken; or
- For real property acquired with federal funds, the date of final disposition (see 24 CFR 84.53 and 85.42).

See the [Chapter 6](#) of the HUD Tenant Assistance, Relocation and Real Property Acquisition Handbook (1378.0) for additional relocation/advisory assistance and real property acquisition recordkeeping requirements.