POLICIES AND PROCEDURES MANUAL

UNIFORM RELOCATION ACT (URA)

COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY (CDBG-DR)

PROGRAM OVERVIEW

Program Name:	CDBG-DR	
Grantee Name:	City of Little Rock (CLR)	
Entity Designated to Administer the Funds	City of Little Rock	
Amount of funds allocated in the action plan:	$20,895,000.00	
HUD Contact (Name):	David Blick	
HUD Contact (Email/Phone):	David.G.Blick@hud.gov / 501-918-5706	
Grantee Contact (Name):	Kevin Howard, Director of Housing and Neighborhood Programs (HNP)	
Grantee Contact (Email/Phone):	khoward@littlerock.gov /501-371-6825	
Grantee Board of Directors:	Frank Scott Jr., Mayor	
	Virgil Miller Jr, Ward 1 Ken Richardson, Ward 2 Kathy Webb, Ward 3 Capi Peck, Ward 4 Lance Hines, Ward 5	Andrea Hogan Lewis, Ward 6 B. J. Wyrick, Ward 7 Vice-Mayor Dr. Dean Kumpuris, Position 8 Antwan Phillips, Position 9 Joan Adcock, Position 10
Grantee City Manager:	Delphone Hubbard	

VERSION POLICY & CHANGE CONTROL

This document is subject to version control. Policy updates may be necessary throughout the life of the Program to clarify, add, or remove requirements governing program operations. All policy decisions will be formally documented and incorporated into the relevant program materials. Unless explicitly stated otherwise, revisions apply prospectively and become effective upon approval of the updated document.

All versions and publication dates are recorded in the Version History Table, along with a brief description of changes. Revisions that reflect a substantive change in policy will result in the issuance of a new major version number (for example, Version 1.0 to Version 2.0). Updates that do not alter policy intent, such as editorial revisions, clarifications, or formatting changes, will be reflected through minor version updates (for example, Version 2.1 or 2.2).

Version	Date	Description
Version 1.0	July 16, 2026	Prepared by: Department of Housing & Neighborhood Programs

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ACRONYMS

Acronym	Meaning
AAN	Allocation Announcement Notice
AMI	Area Median Income
CDBG-DR	Community Development Block Grant – Disaster Recovery
CFR	Code of Federal Regulations
DOB	Duplication of Benefits
DRGR	Disaster Recovery Grant Reporting (HUD system)
FHEO	Office of Fair Housing and Equal Opportunity
FMV	Fair Market Value
GIN	General Information Notice
HCDA	Housing and Community Development Act of 1974
ION	Initiation of Negotiations
LMHI	Low- and Moderate-Income Safe Housing Incentive (national objective)
LMI	Low- and Moderate-Income
RARAP	Residential Anti-Displacement and Relocation Assistance Plan
RROF	Request for Release of Funds
SFHA	Special Flood Hazard Area
URA	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

DEFINITIONS

Term	Definition
Acquiring Agency	The City of Little Rock department, or the Little Rock Urban Renewal Agency, undertaking the acquisition, rehabilitation, or demolition activity.
Displaced Person	Any person (owner-occupant, residential tenant, business, farm, or nonprofit) who moves from real property, or moves personal property from real property, permanently, as a direct result of a written notice of intent to acquire, the initiation of negotiations for, or the acquisition, rehabilitation, or demolition of, real property for a federally assisted project (49 C.F.R. § 24.2(a)(9)).
Person Not Displaced	A person who does not qualify as a displaced person under the exceptions listed at 49 C.F.R. § 24.2(a)(9)(ii), such as a person who moves before the initiation of negotiations, an ineligible alien, or a person whose right to occupy is terminated for cause independent of the acquisition.
Initiation of Negotiations (ION)	The date of the first written offer to purchase, or, for a project involving rehabilitation or demolition without acquisition, the date of execution of the grant/loan agreement between the City and the person owning or controlling the property (24 C.F.R. § 570.606(b)).
Comparable Replacement Dwelling	A dwelling that is decent, safe, and sanitary; functionally equivalent; in an area not subject to unreasonable adverse environmental conditions; reasonably accessible to the displaced person's place of employment; and within the financial means of the displaced person, per 49 C.F.R. § 24.2(a)(6).
Just Compensation	The fair market value of the property (or property interest) to be acquired, as established by an appraisal meeting the requirements of 49 C.F.R. § 24.103.
Voluntary Acquisition	An acquisition meeting all conditions of 49 C.F.R. § 24.101(b), where the acquiring agency does not have, or represents it will not use, the power of eminent domain.
RARAP	Residential Anti-Displacement and Relocation Assistance Plan, required for CDBG/HOME-funded activities that will demolish or convert lower-income dwelling units (24 C.F.R. § 570.606(c) / § 92.353).
Section 104(d)	Section 104(d) of the Housing and Community Development Act of 1974, providing additional relocation and one-for-one replacement housing protections to low-income tenants displaced by CDBG/HOME-funded demolition or conversion.

1. INTRODUCTION AND BACKGROUND

The City of Little Rock receives and administers funds through the Community Development Block Grant–Disaster Recovery (CDBG-DR) program, authorized under Title I of the Housing and Community Development Act of 1974[1]. CDBG-DR supports long-term recovery in communities affected by major disasters, with a focus on restoring housing, infrastructure, and economic stability for low- to moderate-income (LMI) residents.

CLR is committed to administering these funds with integrity, accountability, and efficiency, using creative and effective approaches that address the state's unique recovery and housing needs. All activities will be guided by strong safeguards to prevent waste, fraud, and abuse.

The City is dedicated to innovation, flexibility, and responsiveness in program design and implementation to ensure that unmet recovery and resilience needs are addressed equitably and sustainably.

1.1. Background on CDBG-DR Funding

The CDBG-DR program is a special allocation of federal funding provided by the U.S. Department of Housing and Urban Development (HUD) to assist communities in recovering from disasters declared by the President. These funds are intended to support long-term recovery efforts in areas where the scale of damage exceeds the capacity of local resources and traditional disaster response programs, such as those offered by the Federal Emergency Management Agency (FEMA) or the Small Business Administration (SBA).

CDBG-DR is not an emergency response program. Instead, it is designed to address the unmet needs (see City of Little Rock (CLR) Action Plan) that remain after initial disaster relief has been provided. These needs often include rebuilding homes, restoring infrastructure, revitalizing local economies, and supporting vulnerable populations through public services. While CDBG-DR funds are flexible and can be used for a wide range of recovery activities, all funded activities must be directly tied to disaster-related impacts and must meet one of HUD's three National Objectives:

- Benefit to LMI Persons – This is the primary objective of the CDBG-DR Program. At least 51% of the beneficiaries of an activity are low- and moderate-income (LMI) individuals or households.
- Prevention or Elimination of Slums or Blight – Activities aimed at reducing, preventing, or eliminating conditions of slum or blight in a designated area, or on a spot basis (e.g., demolition of a dangerous, deteriorated building).
- Urgent Need – May be used when an activity addresses a serious and immediate threat to the health or welfare of the community and no other financial resources are available.

Congress appropriates CDBG-DR funds through special legislation in response to major disasters. Once funding is approved, HUD allocates the funds to eligible states, cities, or counties based on the

[1] https://www.govinfo.gov/content/pkg/COMPS-10382/pdf/COMPS-10382.pdf

severity of damage and the extent of unmet needs. HUD also issues detailed guidance, through Federal Register Notices and the CDBG-DR Universal Notice, that outlines how the funds must be used. This includes requirements for public engagement, financial oversight, civil rights compliance, and environmental review.

In January 2025, HUD allocated $20,895,000 in CDBG-DR funding to the City of Little Rock (City or CLR) to support recovery from the March 31, 2023, EF-3 tornado. This funding is governed by the requirements outlined in the Federal Register (90 FR 4759) and the CDBG-DR Universal Notice (90 FR 1754), as amended by Memorandum 2025-02. These documents establish the rules, waivers, and alternative requirements that grantees must follow to ensure that funds are used effectively, equitably, and in compliance with federal law.

The City's CDBG-DR program includes several components, housing, infrastructure, economic revitalization, mitigation, and public services, all designed to help the community recover and build resilience against future disasters. The Housing Programs described in this Plan represent a major component of the City's long-term recovery strategy and focus on stabilizing impacted neighborhoods, supporting homeowners, and increasing the supply of affordable, resilient housing.

1.2. Purpose and Applicability

This manual establishes the City of Little Rock's ("City") policies and procedures for administering Community Development Block Grant–Disaster Recovery (CDBG-DR) activities involving the acquisition, rehabilitation, reconstruction, and demolition of real property in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), 42 U.S.C. § 4601 et seq., and its implementing regulations at 49 C.F.R. Part 24. This manual also incorporates applicable requirements of Section 104(d) of the Housing and Community Development Act of 1974, the applicable Allocation Announcement Notice (AAN), the CDBG-DR Universal Notice, and other applicable federal statutes, regulations, and HUD guidance.

This manual applies to all City departments, subrecipients, contractors, consultants, and other entities administering or carrying out CDBG-DR-assisted activities on behalf of the City, including activities involving the acquisition, rehabilitation, reconstruction, or demolition of real property.

The City anticipates that acquisitions conducted under the CDBG-DR Program will generally consist of voluntary purchases from willing sellers. The City does not intend to use eminent domain in connection with CDBG-DR-assisted acquisitions unless specifically authorized by law and approved in accordance with applicable federal, state, and local requirements.

This manual may be amended as necessary to remain consistent with changes to 49 C.F.R. Part 24, HUD guidance (including future memoranda revising the Universal Notice), or other applicable federal or state requirements. The department administering federal grant funds is responsible for monitoring for regulatory and Universal Notice changes and proposing amendments; amendments are reviewed by the City Attorney's Office before adoption.

1.3. Governing Authority

This Plan has been developed in accordance with the following federal statutes, regulations, and notices, as amended:

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 U.S.C. § 4601 et seq.
- Implementing regulations, 49 C.F.R. Part 24 (“Real Property Acquisition Guidelines” and “Relocation Assistance”).
- For CDBG activities: 24 C.F.R. § 570.606 (incorporating URA requirements) and, for lower-income tenants, Section 104(d) of the Housing and Community Development Act of 1974, 42 U.S.C. § 5304(d), and 24 C.F.R. § 570.496a.
- For HOME-assisted activities: 24 C.F.R. § 92.353.
- HUD Handbook 1378.0, Tenant Assistance, Relocation and Real Property Acquisition.
- Arkansas Code Annotated Title 14, Chapter 169 (Housing Authorities and Urban Renewal Agencies), where the City or an urban renewal agency undertakes acquisition under state redevelopment authority.

Note: This Plan will be updated as needed to reflect subsequent Federal Register Notices, HUD memoranda, or waivers applicable to the City's CDBG-DR allocation.

1.4. Responsible Staff

The Housing and Neighborhood Programs Department, through the CDBG-DR Program, shall be responsible for implementing these policies and procedures. The Department Director may delegate responsibilities related to real property acquisition, relocation assistance, recordkeeping, required notices, compliance monitoring, and other program administration to appropriate City staff, qualified contractors, or consultants, as permitted by applicable federal requirements.

Legal matters, including acquisition authority, eminent domain proceedings, settlement agreements, and interpretation of applicable federal and state laws and regulations, shall be coordinated with the City Attorney's Office, as appropriate.

The following roles are established for administration of this manual:

Role	Responsibility
Department Director	Provides executive oversight of the CDBG-DR Program and ensures adequate staffing, resources, and compliance with applicable federal requirements.
Program Administrator	Administers the day-to-day implementation of acquisition and relocation activities, including preparing required notices, coordinating advisory services and relocation assistance, maintaining program records, processing payments, coordinating with contractors and other City

Role	Responsibility
	departments, and supporting compliance with the Uniform Relocation Act (URA), Section 104(d), the applicable Allocation Announcement Notice (AAN), and the Universal Notice.
Program Manager	Provides overall management of the CDBG-DR Program and oversees acquisition and relocation activities. Responsibilities include acquisition determinations, compliance oversight, coordination of appraisals and negotiations, review of eligibility determinations, monitoring implementation of these policies and procedures, and reviewing appeals, when appropriate.
City Attorney's Office	Provides legal review and guidance regarding acquisition, eminent domain, settlement agreements, appeals, and interpretation of applicable federal, state, and local laws and regulations.

2. Applicability of the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA)

The URA, as amended, and its implementing regulations at 49 C.F.R. Part 24, apply to all CDBG-DR activities administered by the City of Little Rock that involve the acquisition of real property or result in the temporary or permanent displacement of a person. These requirements apply regardless of the amount of CDBG-DR assistance provided or the size of the project.

For purposes of this Manual, URA requirements are generally triggered when a CDBG-DR-assisted project involves one or more of the following activities:

1. The acquisition of real property, in whole or in part, for a CDBG-DR-assisted project;
2. The rehabilitation of real property that requires the temporary or permanent relocation of an owner-occupant, tenant, business, farm, or nonprofit organization;
3. The demolition of real property that requires the displacement of a lawful occupant; or
4. Any other CDBG-DR-assisted activity that directly results in the temporary or permanent displacement of a person.

For acquisition activities, the City shall comply with the acquisition requirements of 49 C.F.R. Part 24, Subpart B. When a CDBG-DR-assisted activity results in the displacement of a person, the relocation requirements of 49 C.F.R. Part 24, Subparts C through E, and any applicable CDBG-DR waivers or alternative requirements published by HUD, shall apply.

3. Exemptions from Certain Acquisition Requirements

Pursuant to 49 C.F.R. § 24.101, certain real property acquisitions are exempt from some or all of the acquisition requirements contained in Subpart B of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). These exemptions are limited and apply only when all applicable regulatory conditions have been satisfied. Unless specifically exempted by federal regulation, the City shall comply with all applicable acquisition requirements.

An exemption from the acquisition requirements of Subpart B does not exempt a project from the relocation assistance requirements of the URA if a person is displaced as a direct result of the CDBG-DR-assisted activity. When displacement occurs, the relocation requirements of 49 C.F.R. Part 24, Subparts C through E, shall apply, regardless of whether the acquisition itself is exempt.

The following acquisition activities may qualify for an exemption from certain acquisition requirements, provided all applicable conditions of 49 C.F.R. § 24.101 are satisfied and documented in the project file:

- Voluntary acquisitions in which the City has no authority to acquire the property by eminent domain, or elects not to exercise that authority, and all conditions of 49 C.F.R. § 24.101(b) are met.
- Temporary or permanent easements meeting the conditions for exemption under 49 C.F.R. § 24.101(c).
- Property donations, provided the owner has been fully informed, in writing, of the right to receive an appraisal (unless waived), the right to just compensation, and voluntarily waives those rights before the donation is accepted.

4. Real Property Acquisition Procedures

4.1. Pre-Acquisition Determination

Before contacting any property owner, the Program Manager must determine and document whether the acquisition is (a) a voluntary acquisition exempt from Subpart B, (b) an involuntary acquisition subject to the full requirements of this Article, or (c) an acquisition using eminent domain. This determination governs which notices and procedures apply and may not be changed after negotiations begin. Prior to initiating acquisition activities, the Program Manager shall also verify that all applicable environmental review requirements under 24 C.F.R. Part 58 have been satisfied or that the acquisition is otherwise authorized prior to completion of the environmental review.

4.2. Initiation of Negotiations (ION)

The Initiation of Negotiations (ION) is the official date used to determine eligibility for relocation assistance and benefits under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). The City shall document the applicable Initiation of Negotiations date in each project file, as this date establishes eligibility for relocation assistance under the URA.

For projects involving the acquisition of real property, the Initiation of Negotiations is the date on which the City delivers the first written offer to purchase the property to the owner, together with the City's written statement of the amount established as just compensation. This written offer shall be based upon an approved appraisal or waiver valuation, as applicable, and shall comply with the requirements of 49 C.F.R. Part 24.

For projects involving rehabilitation, demolition, or other federally assisted activities that do not include the acquisition of real property, the Initiation of Negotiations is the date on which the City executes the grant agreement, loan agreement, or other written agreement with the property owner or person having legal control of the property for the federally assisted activity. This date establishes the point at which occupants may become eligible for relocation assistance if displacement subsequently occurs.

The City shall clearly document the applicable Initiation of Negotiations date in the project file and use that date when determining eligibility for relocation assistance, issuing required notices, maintaining occupancy records, and administering all applicable URA requirements. The occupancy status of all persons occupying the property on the Initiation of Negotiations date shall be documented in the project file.

4.3. Appraisal

The City obtains a qualified appraisal establishing just compensation for each parcel to be acquired, prepared in accordance with 49 C.F.R. § 24.103 and, where required by dollar threshold, reviewed by a qualified review appraiser. Before the appraisal, the owner (and, for tenant-occupied property, any tenant with a compensable interest) receives written notice of the right to accompany the appraiser during the inspection. An appraisal waiver / short-form appraisal may be used only for low-value, uncomplicated acquisitions consistent with the de minimis threshold and process in 49 C.F.R. § 24.102(c)(2). The review appraiser shall determine whether the appraisal is adequate to establish just compensation prior to approval.

4.4. Written Offer and Just Compensation

Before initiating negotiations, the City provides the owner a written offer to purchase the property for the full amount of just compensation, along with a written Statement of the Basis for the Determination of Just Compensation summarizing the appraisal. The amount offered may not be less than the approved appraisal (or, for a waiver valuation, the documented low-value estimate). If the acquisition of only a portion of a property would leave the owner with an uneconomic remnant, as defined in 49 C.F.R. § 24.2(a)(27), the City shall offer to acquire the uneconomic remnant together with the portion needed for the CDBG-DR-assisted project. The owner is given reasonable time to consider the offer and is informed that they may seek independent legal or professional advice.

4.5. Negotiation and Settlement

Negotiations are conducted in good faith. All offers, counteroffers, and the basis for any final negotiated settlement (including any administrative settlement above appraised value, which must be justified and documented) are recorded in the parcel file. A Statement of Settlement Cost is prepared for each completed acquisition.

4.6. Eminent Domain

Eminent domain is used only as a last resort, after good-faith negotiation has failed, and only where the City (or Agency, under A.C.A. § 14-169-801 et seq.) possesses that authority for the project in question. No coercive action, including advancement of the time of condemnation, deferral of negotiations, or intentional delay, may be used to compel an owner's agreement on price. A condemnation referral requires City Attorney's Office review and Board of Directors authorization where required by City ordinance.

4.7. Owner Protections

Owners are notified in writing that the City will not use eminent domain if the acquisition is a confirmed voluntary acquisition. The City shall provide reimbursement for eligible incidental expenses in accordance with 49 CFR §24.106 (recording fees, penalty costs for prepayment of a pre-existing mortgage, and similar closing costs). Owners shall be treated fairly, consistently, and equitably throughout the acquisition process in accordance with 49 C.F.R. Part 24. The City shall not require an owner to surrender possession before payment of the agreed purchase price or deposit of just compensation as provided by law.

4.8. Acquisition Closeout

Upon completion of acquisition for a parcel, the Program Manager prepares an Acquisition Complete Letter and Site Acquisition Report documenting final price, settlement costs, and any owner grievance, and closes the parcel file consistent with Article VIII (Recordkeeping). The acquisition file shall contain all documentation necessary to demonstrate compliance with the URA, including applicable notices, appraisal documents, negotiation records, settlement documentation, deeds or easements, payment records, and correspondence.

5. Relocation Assistance: General Requirements

5.1. Notices to Occupants

The Program Administrator ensures each occupant of a property affected by acquisition, rehabilitation, or demolition receives the following notices, in the sequence and timing required by 49 C.F.R. Part 24, Subpart C:

Notice	When Issued	Purpose
General Information Notice (GIN)	As soon as feasible after a project is identified, and no later than initiation of negotiations	Informs occupants generally of the nature of the project and that they may be displaced, and of basic relocation rights
Notice of Intent to Acquire	Before or concurrent with initiation of negotiations	States the City's intent to acquire the property and the occupant's rights under the URA

Notice	When Issued	Purpose
Notice of Relocation Eligibility	Upon initiation of negotiations, or, for rehabilitation/demolition without acquisition, upon execution of the grant/funding agreement	Establishes the date from which relocation benefit eligibility is measured
90-Day Notice	At least 90 days before the occupant is required to move	States the earliest date by which the occupant may be required to move; not issued until a comparable replacement dwelling has been made available
30-Day Notice	At least 30 days before the occupant is required to move	Advises displaced occupant of the final move date.
Notice of Non-Displacement	Where applicable, when a person will not be displaced	Informs the person they will not be displaced and of any temporary relocation or protections that still apply

The General Information Notice (is the first written notice provided to occupants who may be affected by a federally assisted acquisition, rehabilitation, demolition, or conversion project that could result in temporary or permanent displacement. The purpose of the notice is to inform occupants of the proposed project, explain their rights under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), and advise them not to move before receiving additional written instructions from the City. Issuance of a General Information Notice does not establish that an individual is a displaced person under the URA and does not constitute a determination of eligibility for relocation assistance or benefits.

The City shall issue a General Information Notice as soon as practicable after identifying a project that may result in displacement and before making any determination regarding relocation eligibility, issuing a Notice of Eligibility, or taking any action that could reasonably cause an occupant to vacate the property. General Information Notices shall be provided to all residential owner-occupants, residential tenants, businesses, farms, nonprofit organizations, and other lawful occupants who may be affected by the federally assisted project. The General Information Notice shall contain the information required by 49 CFR Part 24 and HUD Handbook 1378.

The City shall maintain documentation demonstrating compliance with this requirement, including the date the notice was issued, the method of delivery, the recipient's name and property address, and proof of receipt or documentation of delivery attempts. Following issuance of the General Information Notice, the City shall provide all subsequent notices required under the URA, including Notices of Eligibility, 90-Day Notices, 30-Day Notice, and any other notices required by applicable federal regulations, based on the circumstances of the project and the occupant's eligibility.

i. 90-Day Notice to Vacate

The City shall provide each eligible displaced person with a written 90-Day Notice to Vacate at least ninety (90) days before requiring the occupant to move from the property. The notice shall specify the earliest date by which the occupant may be required to vacate and shall advise the occupant that they will not be required to move before the expiration of the 90-day period.

The City shall not issue a 90-Day Notice or require an occupant to vacate the property until a comparable replacement dwelling has been identified and made available to the displaced person, except as otherwise permitted by applicable federal regulations. The comparable replacement dwelling shall meet the requirements of 49 CFR §24.2(a)(6).

The Program Administrator shall document the basis for determining that a comparable replacement dwelling has been made available prior to issuing the 90-Day Notice. Documentation shall include the address of the comparable dwelling, the date it became available, the basis for determining comparability, and the date the notice was delivered. A copy of the notice and proof of delivery shall be maintained in the relocation file.

ii. 30-Day Notice to Vacate

When appropriate, the City shall issue a written 30-Day Notice to Vacate after the 90-Day Notice has been provided. The 30-Day Notice shall specify the actual date by which the occupant must vacate the property and shall provide not less than thirty (30) days' advance written notice before the required move date.

The 30-Day Notice shall not shorten or replace the required ninety-day notice period. Rather, it serves to establish the final move date once construction schedules, acquisition activities, or other project milestones have been finalized. If project delays require a later move date, the City shall provide the occupant with updated written notification and shall not require the occupant to move earlier than previously authorized.

The Program Administrator shall maintain a copy of the 30-Day Notice, proof of delivery, and documentation supporting the established move date in the project file.

5.2. Determination of Displaced Person Status

The City shall determine and document whether each occupant affected by a federally assisted acquisition, rehabilitation, demolition, or conversion activity qualifies as a displaced person under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and its implementing regulations at 49 C.F.R. Part 24. A displaced person is generally an individual, family, business, farm, or nonprofit organization that moves permanently or temporarily from real property, or moves personal property from real property, as a direct result of the acquisition, rehabilitation, or demolition of property for a federally assisted project.

The Program Administrator shall evaluate each case individually based on the facts and circumstances of the project and shall document the basis for the determination in the project file before issuing a Notice of Eligibility or Notice of Non-Displacement. A person shall not be determined to be displaced solely because a federally assisted project exists. Likewise, a person who voluntarily moves before receiving required notices or whose occupancy is not directly affected by the federally assisted activity may not qualify as a displaced person under the URA. All determinations shall be supported by written documentation and maintained in the project file. Determinations shall be made in accordance with 49 CFR §24.2(a)(9).

Table 1. Displaced Person Determination Checklist

Question	Yes	No	N/A
Was the occupant lawfully occupying the property on the Initiation of Negotiations (ION) date?	☐	☐	☐
Was the occupant provided the required General Information Notice (GIN)?	☐	☐	☐
Is the project federally funded or federally assisted?	☐	☐	☐
Is the occupant required to permanently move because of the project?	☐	☐	☐
Is the occupant required to temporarily relocate because of rehabilitation or demolition?	☐	☐	☐
Is the move a direct result of acquisition, rehabilitation, demolition, or conversion?	☐	☐	☐
Is the occupant an owner-occupant?	☐	☐	☐
Is the occupant a residential tenant?	☐	☐	☐
Is the occupant a business, farm, or nonprofit organization?	☐	☐	☐
Was the occupant issued a Notice of Relocation Eligibility?	☐	☐	☐
Does any URA exclusion under 49 C.F.R. § 24.2(a)(9)(ii) apply?	☐	☐	☐
Is the occupant eligible for relocation assistance?	☐	☐	☐

5.3. Relocation Advisory Services

The City provides relocation advisory services to all eligible displaced persons, including current and continuing information on the availability of comparable replacement dwellings or business locations, assistance in completing claim forms, and referral to other agencies providing housing, financial, or other assistance.

5.4. Temporary Relocation Procedures

When temporary relocation is necessary to complete a CDBG-DR-assisted rehabilitation or demolition activity, the City shall develop a written Temporary Relocation Plan before requiring the occupant to relocate. The plan shall identify the reason for the temporary relocation, anticipated duration, temporary housing arrangements, moving and storage assistance, eligible relocation expenses, advisory services, and procedures for returning the occupant to the property.

Temporary relocation shall be conducted in accordance with 49 CFR Part 24, HUD Handbook 1378, the City's Residential Anti-Displacement and Relocation Assistance Plan (RARAP), and applicable program procedures.

The Program Administrator shall maintain documentation demonstrating the necessity for temporary relocation, the assistance provided, eligible expenses, notices issued, payment records, and the occupant's return to the property.

5.5. No Duplication of Benefits

No person will receive a relocation payment under this manual if the person receives a payment under federal, state, or local law determined to have the same purpose and effect.

6. Relocation Payments: Residential

Eligible residential displaced persons shall receive relocation assistance in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 49 C.F.R. Part 24, applicable CDBG-DR waivers and alternative requirements published by HUD, and this Manual. The City shall determine eligibility and calculate all relocation payments in accordance with applicable federal requirements and shall maintain documentation supporting each determination and payment in the relocation file.

Displaced residential occupants are eligible for reimbursement of actual, reasonable moving and related expenses in accordance with 49 C.F.R. § 24.301. Eligible expenses may include the packing, transportation, storage, insurance, and reconnection of personal property, together with other reasonable moving-related expenses authorized under the URA.

Residential owner-occupants who have owned and occupied the displacement dwelling for at least ninety (90) days immediately preceding the Initiation of Negotiations may be eligible for replacement housing assistance in accordance with 49 C.F.R. § 24.401. Displaced tenants and owner-occupants who do not meet the ninety-day ownership and occupancy requirement may be eligible for rental assistance or downpayment assistance in accordance with 49 C.F.R. § 24.402.

When a CDBG-DR-assisted activity also triggers the requirements of Section 104(d) of the Housing and Community Development Act of 1974, the City shall provide relocation assistance and one-for-one replacement housing in accordance with 24 C.F.R. § 570.496a, applicable CDBG-DR waivers and alternative requirements issued by HUD, and the City's Residential Anti-Displacement and Relocation Assistance Plan (RARAP). Where both the URA and Section 104(d) apply, eligible occupants shall receive the greater level of assistance required by applicable law.

If the City determines that comparable replacement housing cannot be made available within the standard URA payment limits, or that a displaced person cannot otherwise be relocated to comparable replacement housing, the City shall provide Last Resort Housing assistance in accordance with 49 C.F.R. § 24.404. The basis for the determination and the assistance provided shall be documented in the relocation file.

7. Relocation Payments: Nonresidential (Businesses, Farms, Nonprofits)

Businesses, farms, and nonprofit organizations displaced as a direct result of a CDBG-DR-assisted acquisition, rehabilitation, or demolition activity shall be provided relocation advisory services and relocation payments in accordance with 49 C.F.R. Part 24. Eligible displaced entities may elect reimbursement for actual, reasonable, and necessary moving and related expenses, including eligible reestablishment expenses, or a fixed payment in lieu of actual moving expenses based on average annual net earnings, provided the eligibility requirements of 49 C.F.R. §§ 24.301, 24.303, 24.304, and 24.305 are satisfied.

When temporary relocation is necessary to complete a CDBG-DR-assisted rehabilitation activity, the City shall coordinate with the displaced business, farm, or nonprofit organization to minimize disruption to operations and shall reimburse eligible temporary relocation expenses in accordance with the URA. Temporary relocation shall not be used to avoid providing permanent relocation benefits when the facts and circumstances constitute permanent displacement under 49 C.F.R. Part 24. The City shall maintain documentation supporting all determinations, advisory services, and relocation payments in the relocation file.

8. Buyouts (Voluntary Acquisition for Disaster Risk Reduction)

The City may use CDBG-DR funds to voluntarily acquire real property for disaster risk reduction in accordance with the applicable CDBG-DR Universal Notice, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 49 C.F.R. Part 24, and other applicable federal requirements. Buyouts are intended to permanently reduce future disaster risk by acquiring properties located in areas subject to repetitive flooding, erosion, or other natural hazards.

The City does not currently administer a voluntary buyout program under its approved CDBG-DR Action Plan. This section is included to establish policy should a buyout activity be approved through a future Action Plan amendment.

If the Action Plan is amended, participation in the City's buyout program shall be entirely voluntary. Property owners may decline to participate without penalty, and the City shall not use eminent domain or any coercive action to acquire property for a CDBG-DR buyout unless specifically authorized by HUD through an approved waiver or alternative requirement.

8.1. Disaster Risk Reduction Areas

The City may conduct buyouts within FEMA-mapped floodways, floodplains, or other Disaster Risk Reduction Areas designated in accordance with the applicable CDBG-DR Universal Notice. When designating a Disaster Risk Reduction Area outside a mapped flood hazard area, the City shall base its determination on the mitigation needs identified in its Action Plan, available engineering or scientific data, and other documentation demonstrating an ongoing or future disaster risk.

8.2. Acquisition and Property Management

All buyout acquisitions shall be conducted in accordance with the applicable acquisition requirements of the URA and 49 C.F.R. Part 24, except where modified by the applicable CDBG-DR Universal Notice or subsequent HUD waivers and alternative requirements.

Property acquired through the City's buyout program shall be restricted in perpetuity for uses authorized by HUD, including open space, recreational use, floodplain or wetland management, or other disaster risk reduction purposes. The City shall record deed restrictions or restrictive covenants necessary to ensure compliance with these requirements and shall administer all acquired properties in accordance with its Open Space Management Plan and applicable federal requirements.

Eligible occupants displaced by a buyout shall receive relocation assistance in accordance with the URA and this Manual. The City shall document the applicable CDBG national objective for each buyout activity and shall report all buyout activities in the Disaster Recovery Grant Reporting (DRGR) system in accordance with HUD requirements.

8.3. Post-Acquisition Requirements

Acquired property must be dedicated and maintained in perpetuity for open space, recreational, floodplain/wetlands management, or other disaster-risk-reduction use. No new structure may be built on the property except an open-sided public facility functionally related to the open space use, a restroom, or a flood control structure meeting the technical and approval conditions in the Universal Notice. The property owner (and successors) is permanently barred from seeking further federal disaster assistance tied to that property, except for an allowed use described above.

A deed restriction or covenant running with the land must impose these restrictions in perpetuity.

8.4. Valuation Method

The City applies pre-disaster fair market value as its buyout valuation method and applies that method consistently across its buyout program, documenting any case-by-case exception (for example, where post-disaster value exceeds pre-disaster value) and the criteria used to grant it.

8.5. National Objective and Reporting

A buyout that merely pays a homeowner to leave does not by itself satisfy the low- and moderate-income housing national objective; the City documents which national objective pathway applies (combining acquisition with a direct LMI housing benefit, meeting area-benefit criteria, or restricting eligibility to LMI sellers acquired above fair market value) for each buyout activity, and classifies all buyout activities using the “buyout” activity type in the DRGR system.

8.6. Redevelopment of Non-Buyout Acquisitions

Properties acquired outside the buyout program may be redeveloped consistent with the City's long-term redevelopment plans. Acquisition cost for such properties may not be based on pre-disaster fair market value; it must comply with applicable federal cost principles and 49 C.F.R. Part 24, Subpart B, as modified by the Universal Notice. The City may offer optional relocation assistance under Section 11.2 to an owner whose property is voluntarily acquired for redevelopment where the owner's need for additional assistance is documented, and any tenant displaced by such acquisition remains eligible for URA relocation assistance. Acquisition or buyout of second homes at post-disaster fair market value is not prohibited, but second homes are not eligible for rehabilitation assistance or safe housing incentives.

9. Residential Anti-Displacement and Relocation Assistance Plan (RARAP)

For any CDBG-DR-assisted activity that will demolish or convert lower-income dwelling units to a use other than lower-income housing, the City (or the administering department/subrecipient) prepares and makes publicly available a Residential Anti-Displacement and Relocation Assistance Plan before entering into a contract committing the City to provide funding for the activity, consistent with 24 C.F.R. § 570.606(c) and § 92.353. The plan describes the steps the City will take to minimize displacement and to replace demolished or converted lower-income dwelling units on a one-for-one basis. See webpage for the full City's RARAP.

10. Duplication of Benefits

Where CDBG-DR or other disaster recovery funds are used, the City must prevent a Duplication of Benefits (DOB) consistent with the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 et seq.) and CDBG-DR appropriations acts. A duplication occurs when a person, household, or business receives disaster assistance from multiple sources for the same recovery purpose and the total received for that purpose exceeds total need. Before making an acquisition offer, relocation payment, or rehabilitation/reconstruction award, the City calculates and documents all other disaster assistance received or reasonably anticipated for the same purpose (insurance proceeds, FEMA awards, SBA loans, other grants) and reduces its own assistance accordingly, consistent with the DOB methodology in the applicable Action Plan and Appendix C of the Universal Notice.

11. CDBG-DR-Specific Waivers and Alternative Requirements to the URA and Section 104(d)

This Article applies only when the City's acquisition, rehabilitation, or demolition activity is funded, in whole or in part, with CDBG-DR funds subject to HUD's Universal Notice (90 FR 1754), as revised by Memorandum 25-02 and Memorandum 25-03 (changes applicable April 5, 2025). Where CDBG-DR funds are not used, Articles III through IX of this manual apply without the modifications described below. The Real Property Acquisition Manager confirms, for each project, which funding source(s) apply and documents that determination in the parcel or program file before applying any waiver in this Article.

CDBG-DR Residential Anti-Displacement and Relocation Assistance Plan (RARAP)

Consistent with Universal Notice section III.B.15.a, the City must have in effect, and follow, a RARAP satisfying Section 104(d)(1)–(2) of the HCDA and 24 C.F.R. § 42.325. If the City has an existing RARAP for its regular CDBG program, it must either amend that RARAP or adopt a separate RARAP specific to its CDBG-DR grant before undertaking any CDBG-DR activity, including buyouts, that may cause displacement. The CDBG-DR RARAP must describe how the City will minimize displacement (including through non-displacing recovery activities such as rehabilitation-in-place), how it will minimize the adverse impacts of displacement where displacement cannot reasonably be avoided, and its plan to replace, on a one-for-one basis, occupied and vacant occupiable low-income dwelling units demolished or converted with CDBG-DR funds, unless a one-for-one waiver has been requested and granted.

Optional Relocation Policy

Universal Notice section III.B.15.b waives 24 C.F.R. § 570.606(d) to the extent it would otherwise limit optional relocation policies to the grantee level. The City (or, where the City is a subrecipient of a state CDBG-DR grantee, the City acting as subrecipient) may adopt a written optional relocation policy providing relocation assistance beyond what the URA or Section 104(d) otherwise requires. Any such policy must be publicly available, must describe the assistance elected, and must provide equal relocation assistance within each class of displaced persons.

Section 104(d) Relocation Assistance Aligned to URA Amounts

Universal Notice section III.B.15.c waives the relocation assistance requirements at Section 104(d)(2)(A)(iii) and (2)(B) of the HCDA and 24 C.F.R. § 42.350. As a result, a person who qualifies as a displaced person under Section 104(d) does not lose that eligibility, but the type and amount of relocation assistance the City provides to that person is limited to the types and amounts available under the URA and 49 C.F.R. Part 24, not the potentially broader assistance otherwise available under Section 104(d). Staff processing a Section 104(d)-eligible claim must calculate the payment using URA schedules, not the standard Section 104(d) schedule, for any CDBG-DR-funded activity.

One-for-One Replacement Housing: Waiver Process

The one-for-one replacement obligation under 24 C.F.R. § 42.375 remains in effect for CDBG-DR activity unless the City requests, and HUD grants, a waiver under Universal Notice section III.B.15.d. A waiver request must include a good-cause justification supported by a data-driven analysis showing an adequate supply of vacant, standard-condition, lower-income dwelling units available to meet the housing needs of low- and moderate-income owners and tenants in the affected area or surrounding communities. Absent an approved waiver, the City tracks and reports one-for-one replacement compliance in the RARAP and in its DRGR reporting.

Lump-Sum Relocation Payments to Residential Tenants

Universal Notice section III.B.15.e waives 42 U.S.C. § 3537(c) to the extent needed to allow the City to disburse relocation rental assistance to displaced residential tenants as a single lump-sum payment rather than in installments. The Relocation Coordinator may elect lump-sum disbursement to reduce administrative burden and accelerate assistance to disaster-displaced tenants, and documents the election in the tenant's case file.

Voluntary Acquisition: Homebuyer Primary Residence Purchase

Universal Notice section III.B.15.f waives 49 C.F.R. § 24.101(b)(2) to the extent it would otherwise impose full voluntary-acquisition documentation requirements on an individual homebuyer (as opposed to the City or Agency) who uses CDBG-DR down-payment or homebuyer assistance to purchase and occupy a home as their primary residence, and who does not hold the power of eminent domain. This waiver reduces administrative burden on the homebuyer; it does not eliminate relocation-eligibility protections for any tenant displaced by such a purchase, who may still be eligible for URA relocation assistance under Article IV–VI of this manual.

Stafford Act Section 414 Waiver (Projects Beginning More Than One Year After the Disaster)

Section 414 of the Stafford Act, 42 U.S.C. § 5181, ordinarily allows a person who cannot meet URA occupancy requirements because of the disaster to still qualify for a replacement housing payment. Universal Notice section III.B.15.g waives Section 414 and 49 C.F.R. § 24.403(d)(1) for a CDBG-DR-funded acquisition, rehabilitation, or demolition project that commences more than one year after the applicable Presidentially declared disaster, provided the project was not planned, approved, or already underway before the disaster. A project is considered to have commenced on the earliest of: the date of an approved Request for Release of Funds (RROF) and certification; the date a site-specific environmental review is completed under tiering; or the date of sign-off converting the project to exempt status under 24 C.F.R. § 58.34(a)(12). This waiver does not apply to a person who otherwise meets URA occupancy requirements, nor to persons displaced or temporarily relocated by other HUD-funded programs; their URA eligibility is unaffected. The Relocation Coordinator documents the applicable commencement date for each project to determine whether this waiver applies.

Flood Insurance Purchase Requirement Tied to Acquisition and Rehabilitation

Where the City uses CDBG-DR funds to acquire, rehabilitate, or reconstruct a residential structure located in a Special Flood Hazard Area (SFHA), it must ensure the property owner obtains and maintains flood insurance under the National Flood Insurance Program, consistent with Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. § 4012a) and 24 C.F.R. § 58.6(a)(2). Consistent with Section 582 of the National Flood Insurance Reform Act of 1994, as amended (42 U.S.C. § 5154a), future disaster assistance to the property may be conditioned on maintaining that insurance, and the City must provide written notice of this requirement to any transferee of the property.

12. Recordkeeping and Monitoring

The City maintains a separate file for each parcel acquired and each displaced person, containing all notices issued, the appraisal and review appraisal, the written offer and statement of basis, negotiation records, settlement documents, relocation eligibility determination, and all payment claims and disbursements. Records shall be retained for not less than the period required by 2 CFR Part 200, the applicable CDBG-DR grant agreement, HUD requirements, or other applicable federal or state law, whichever is longer. The City will require subrecipients and development partners to maintain equivalent documentation and will monitor subrecipient compliance with this Plan as part of its overall CDBG-DR program oversight responsibilities.

The Program Administrator maintains a Uniform Act / Site Acquisition Report for each project summarizing parcels acquired, persons displaced, and payments made, made available to HUD or other funding agency upon request.

13. Complaints and Appeals

All persons displaced or otherwise affected by a CDBG-DR-assisted activity have the right to file a complaint or appeal regarding actions taken under this Plan. Appeals related to relocation assistance shall be processed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA), including the requirements of 49 CFR § 24.10, and the City's applicable CDBG-DR appeals procedures. Information regarding appeal rights and procedures will be included in all required URA notices.

The City will accept complaints and appeals in writing. When necessary, complaints and appeals may also be accepted verbally or through other reasonable means. If the City determines that an individual is unable to submit a written complaint or appeal due to a disability, limited English proficiency, or other communication barrier, the City will provide reasonable assistance, either directly or through an appropriate third party, to prepare the complaint or appeal at no cost to the individual.

The City will acknowledge and respond to complaints and appeals in writing within fifteen (15) working days, whenever practicable.

Complaints and appeals should be submitted to:

Tracey Shine
City of Little Rock
Housing & Neighborhood Programs
500 W. Markham Street, Suite 120
Little Rock, AR 72201

Phone: (501) 371-6825
Email: tshine@littlerock.gov

Individuals who believe they have been subjected to discrimination or that the City has failed to comply with Title VI of the Civil Rights Act of 1964, Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency), or other applicable federal civil rights requirements may file a complaint with the U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity (FHEO) or the Arkansas Fair Housing Commission.

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity – Southwest Region
819 Taylor Street
Fort Worth, TX 76102
Phone: (817) 978-5965
Fax: (817) 978-5876
Toll-Free: (888) 560-8913
TTY: (800) 877-8339 *(Federal Relay Service)*

Arkansas Fair Housing Commission
Toll-Free: (800) 340-9108

14. Contact Information

Questions regarding this Plan, or requests for relocation assistance information, may be directed to cdbg@littlerock.gov.

Annex 1: Key Citations

Citation	Subject
42 U.S.C. § 4601 et seq.	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
49 C.F.R. Part 24, Subpart A	General provisions and definitions
49 C.F.R. Part 24, Subpart B	Real property acquisition requirements (§§ 24.101–.108)
49 C.F.R. Part 24, Subpart C	General relocation requirements (§§ 24.201–.210)
49 C.F.R. Part 24, Subpart D	Payments for moving and related expenses (§§ 24.301–.306)
49 C.F.R. Part 24, Subpart E	Replacement housing payments (§§ 24.401–.404)
24 C.F.R. § 570.606	CDBG displacement, relocation, acquisition, and replacement of housing
24 C.F.R. § 570.496a	Section 104(d) requirements for CDBG
24 C.F.R. § 92.353	HOME displacement, relocation, and acquisition
42 U.S.C. § 5304(d)	Section 104(d) of the Housing and Community Development Act of 1974
A.C.A. §§ 14-169-801 to -804	Arkansas acquisition of property for urban renewal
Universal Notice, 90 FR 1754 (as amended by Memoranda 25-02 and 25-03)	CDBG-DR common application, waivers, and alternative requirements, incl. §§ III.A.2.a, III.B.11, III.B.15, III.D.5.h–k
Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5121 et seq.	Duplication of Benefits prohibition; Section 414 replacement housing occupancy protection
42 U.S.C. § 4012a; 24 C.F.R. § 58.6(a)(2)	Mandatory flood insurance purchase for acquisition/rehabilitation in a Special Flood Hazard Area