

CHAPTER 25

RELOCATION AND REAL PROPERTY ACQUISITION

- 25-1 **PURPOSE.** The purpose of this Chapter is to provide guidance for conducting monitoring of relocation assistance and real property acquisition in Community Planning and Development (CPD) programs and projects.
- 25-2 **ROLES AND RESPONSIBILITIES.** This Chapter is to be used primarily by HUD Regional Relocation Specialists and, to a lesser degree, by CPD Representatives. Regional Relocation Specialists have primary responsibility for monitoring HUD program participants for compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), section 104(d) of the Housing and Community Development Act of 1974 (section 104(d)), and related relocation program requirements in HUD-assisted housing and community development programs.
- 25-3 **APPLICABILITY.** Relocation and real property acquisition in federally-assisted programs and projects are subject to the requirements of the URA. The displacement of any lower-income person as a direct result of the demolition of any housing unit or the conversion of an occupied or vacant occupiable lower-income dwelling unit to a use other than lower-income housing in connection with a Community Development Block Grant (CDBG) program or project [including State, Entitlement, HUD-Administered Small Cities, Section 108 Loan Guarantee, Special Purpose Grants, Economic Development Initiative (EDI – competitive), Brownfields Economic Development Initiative (BEDI), Historically Black Colleges and Universities (HBCU)], Home Investment Partnership (HOME), or Urban Development Action Grant (UDAG) (excluding insular areas) is also subject to the requirements of section 104(d).

A list of HUD-assisted programs subject to the requirements of the URA and/or section 104(d) is found in Attachment 1. This guidance on relocation assistance and real property acquisition monitoring applies to the list of covered CPD programs and should also be used when monitoring the list of covered programs administered by the Office of Housing and the Office of Public and Indian Housing.

- 25-4 **PREPARING FOR MONITORING.** In preparing for a monitoring review, the HUD reviewer should:
- A. **Examine available information.** Notes and records of prior contacts and monitoring reviews, if any, should be checked to determine whether particular cases need to be re-examined, whether any follow-up actions from a prior

review need to be reviewed, and to identify problem areas. The reviewer should check program files, audit reports and other relevant data sources such as citizen and administrative complaints.

- B. Select the project(s) and program(s) to be reviewed. The reviewer should take into account the level of program activities (e.g., acquisition, demolition, rehabilitation, conversion, or any combination of these activities) and the “initiation of negotiations” date, the milestone in determining a person’s eligibility for relocation assistance (e.g., dates of program approval, contract execution, and other actions that establish eligibility under the URA, section 104(d) and HUD program regulations).
 - C. Consult with appropriate staff. The reviewer should consult with CPD and other field staff (Housing, Public and Indian Housing, FHEO) who have been in the jurisdiction recently or who may have pertinent observations or suggestions to make. As appropriate, the reviewer should also consult with program participant staff.
 - D. Follow the pre-monitoring procedures described in Chapter 2 of this Handbook. Shortly before the review, the reviewer should contact and remind the program participant of the specific dates and times for meetings to take place.
 - E. Complete applicable monitoring exhibits. Exhibits 25-1 and 25-2 should be completed for all reviews, except reviews of State-administered programs. (For reviews of State-administered programs, see Paragraph 25-12; use Exhibit 25-8.) Exhibits 25-3, 25-4, 25-5, 25-6 and 25-7 should be used as applicable.
- 25-5 SELECTION OF CASE FILES TO BE REVIEWED. The program or project being reviewed may include a single activity (i.e., acquisition, rehabilitation, or demolition) or any combination of activities. Therefore, the caseload may contain acquisition files, as well as files for persons displaced and/or files for occupants not displaced. Paragraph 25-5.A outlines the basic criteria for selecting areas to be reviewed. Paragraphs 25-5.B, 25-5.C and 25-5.D provide guidance for determining which specific files in an area should comprise the review sample for the monitored program or project.

The sample must be large enough to be representative of the size and nature of the workload and should be adjusted to reflect the reviewer's knowledge of program participant performance and the other factors listed below. Generally, the cases shall be selected at random and cover the period since the last monitoring review, if applicable, with particular emphasis on the more recent cases which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new program, the reviewer should select a representative sample of all cases since the beginning of the program.

- A. Basic Criteria. Factors to be considered in selecting cases to be reviewed are:
1. Number and type of projects and programs receiving HUD funding and the organization of program participant staff. A project or program may involve relocation, real property acquisition or both. Those functions may not necessarily be managed by the same staff and, therefore, coordination is required among the various staff which contribute to the relocation and acquisition process.
 2. Date of last monitoring review. Programs or projects least recently and/or never reviewed should receive priority.
 3. Size of workload (i.e., number of persons to be displaced, number of occupants to remain, number of units to be rehabilitated or demolished, and/or number of parcels to be acquired).
 4. Type and complexity of workload (e.g., residential displacement of persons receiving housing assistance; acquisition and relocation of owner-occupied commercial structures; large commercial and/or industrial displacement; temporary moves; displacement of persons with reasonable accommodations for disabilities, live-in aides, medical equipment, assistance animals).
 5. The experience and training of the program participant's staff. Activities carried out by new or inexperienced staff should receive a priority.
 6. The seriousness of previous monitoring findings that required corrective action. As appropriate, specific cases involved in prior findings should be reviewed.
 7. CPD risk assessment score for the program participant.
 8. Complaints and appeals filed with the program participant or Field Office.
 9. The income levels of persons in the caseload. The formula for calculating replacement housing payments may be different for low-income persons, and, if applicable, case files for both low-income persons and persons that are not low-income should be included in the sample.
- B. Acquisition Sample. Generally, an acquisition sample should be based on cases for which settlement has been completed. However, if necessary to provide a representative sample of acquisition activities, the reviewer may include incomplete transactions in which negotiations have been initiated. The sample of cases should be representative of the program participant's activities (e.g., residential, commercial and industrial).

- C. Displacement Sample. Generally, the displacement sample should include completed cases in which payments have been made. However, if necessary to provide a representative sample, other cases may be included. The sample should provide a basis to determine not only whether payments were computed properly and made promptly, but also whether displaced persons received the full range of relocation payments and services to which they were entitled. Cases in which an appeal has been filed or the program participant has determined that a person is ineligible for relocation assistance should be given a high priority. The sample of cases should include tenants and owners, both residential and nonresidential cases, with particular emphasis on low-income persons and persons with disabilities.
 - D. Sample of Occupants Not Displaced. It is important to review cases where the occupants were not required to move permanently, although the project resulted in acquisition, rehabilitation, demolition or conversion. (An occupant that was not displaced, may or may not have relocated permanently for reasons unrelated to the prior project, or may have moved temporarily.) The reviewer must compare pre-project and post-project occupancy and areas where complaints have been made or noncompliance is suspected. The sample must provide a basis for concluding that the required conditions under which persons have been permitted to occupy the project, during and after completion, have been met.
- 25-6 REVIEWING CASE FILES. The reviewer should thoroughly examine program participant documentation in the program participant's records and files for each of the cases in the selected sample and determine whether the person received the full level of payments and services to which the person was entitled under the URA, section 104(d) and applicable program regulations. The reviewer should complete the applicable monitoring exhibit for each of the cases reviewed. If feasible, following the case file review, a representative sample of persons should be interviewed and their housing or business inspected as described in Paragraph 25-7.
- A. Case Files on Persons Displaced. The reviewer should examine displacement records for compliance with the URA, section 104(d) and applicable program regulations and complete Exhibit 25-3 or 25-4. For persons displaced, there should be separate case files. The reviewer shall determine whether:
 - 1. The person received a General Information Notice (GIN), which provides early written notice of the possible displacement and a general description of the relocation payments and advisory services for which the person may be eligible, basic eligibility conditions and the procedures for obtaining payments, and the person received the pertinent HUD information booklet or its equivalent.

2. The program participant identified the person's relocation needs and preferences, and, through personal contact, explained the person's rights and options.
 3. The person received timely written notice of his or her eligibility for relocation assistance and, for those displaced from a dwelling, notice of the specific comparable replacement dwelling and the related cost to be used to establish the upper limit of the replacement housing payment.
 4. The program participant provided other services, as appropriate, including referrals to other replacement properties. For residential displacement, the files should indicate the rent/utility costs or sale price of each dwelling, date of availability, and reason(s), if any, the person declined the referral.
 5. The 90-day notice and/or vacate notice, if issued, complies with applicable policies.
 6. The files contained identification and an address for the actual replacement property, the date of relocation and, for residential relocation, the rent/utility costs or sale price.
 7. For residential relocation, the replacement dwelling was inspected. At a minimum, the replacement dwelling must be decent, safe and sanitary. A copy of the replacement dwelling inspection report showing the condition of the unit and the date of inspection should be reviewed.
 8. Payment computations were accurate. A copy of each approved claim form and related documentation should be reviewed.
 9. The person actually received the payment(s) and, if applicable, Section 8 Housing Choice voucher assistance or a similar government housing subsidy.
 10. An appeal or complaint was filed and if the program participant responded in accordance with the requirements of 49 CFR 24.10(g).
- B. Case Files on Persons Not Displaced. The reviewer should examine the records on occupants not displaced to determine compliance with applicable program regulations and complete Exhibit 25-5 or 25-6. The reviewer should determine:
1. Whether the occupant received timely written notice that he or she would not be displaced by the project (e.g., Notice of Nondisplacement).
 2. For a tenant-occupant of a dwelling:

- (a) whether 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,
 - (b) whether the tenant received reimbursement of any out-of-pocket expenses incurred in connection with any temporary relocation or a permanent move to another unit in the building/complex, and
 - (c) whether the duration of any temporary relocation exceeded 1 year.
 3. Whether any appeal or complaint was filed and if the program participant responded in accordance with the requirements of 49 CFR 24.10(g).
- C. Acquisition Case Files. The reviewer shall examine the acquisition records for compliance with the basic acquisition policies of the URA (49 CFR 24.102) and complete Exhibit 25-7. For each parcel acquired, the reviewer shall determine whether:
1. The owner was informed in writing and as soon as feasible about the program participant's interest in acquiring the property and his or her rights (i.e., a Notice to Owner required by 49 CFR 24.102(b)), and whether the owner received a copy of the booklet, "When A Public Agency Acquires Your Property," or the equivalent.
 2. The owner was invited to accompany each appraiser on the appraiser's inspection of the property (unless an appraisal is not required pursuant to 49 CFR 24.102(c)(2)). [49 CFR 24.102(c)(1)]
 3. The appraisal report(s), including the review appraiser's report, met the requirements at 49 CFR 24.103 and 49 CFR 24.104.
 4. The owner was provided an appropriate written offer of just compensation determined in compliance with 49 CFR 24.102(e) and summary statement of the basis for the determination of just compensation in a timely manner. (The URA regulations at 49 CFR 24.102(d) require that the offer of just compensation be no less than the appraisal amount, taking into account allowable damages or benefits to any remaining property.)
 5. The purchase contract sets forth reasonable terms and conditions for the conveyance and whether the file contained copies of recorded documents conveying the property.
 6. The closing statement identified all incidental expenses and there is evidence that the owner received all of the net proceeds due from the sale.

7. Any appeal or complaint was filed and whether the program participant's response was in accordance with the requirements of 49 CFR 24.10(g).

25-7 INTERVIEWS. Interviews of displaced persons, occupants permitted to remain in the property, and former property owners are essential elements of the monitoring process. At least one interview should be carried out for every three to five case files reviewed. At a minimum, each review must include at least one interview, unless compelling circumstances preclude this. If it is not possible to interview any persons, the reviewer shall explain the circumstances in the monitoring letter. Interviews are needed to check the accuracy of the information in the case files and give the reviewer a better perspective of the program participant's performance.

A representative sample of persons whose case files were reviewed, including residential and nonresidential persons, persons not displaced and former property owners, should be interviewed. Among the factors to consider in selecting persons to be interviewed are the following:

- A. Documentation in the case file is not sufficient to permit the reviewer to clearly judge whether the person received the full range of assistance.
- B. Indications that the person may have had difficulty representing his or her best interests.
- C. Whether an appeal was filed, and the action(s) taken to grant the relief requested by the person.
- D. Length of time the person's case file remained open.

The interview should be face-to-face, organized and concise. Alternative formats should be used for the interview to accommodate any persons who are hearing impaired, and interpretive services should be arranged for any persons who are limited English proficient. The questions should be structured to elicit a clear response that clarifies, substantiates or disproves the information in the case file documentation. The questions should be tailored to the circumstances.

Before interviewing a person, the reviewer must provide the person with a copy of a HUD-approved "Privacy Act Statement" (see Attachment 2, Privacy Act Statement) and assure that the person understands that the decision to respond to questions is entirely voluntary. No penalty will result from a decision to respond or to not respond. A copy of the Privacy Act Statement may be retained by the person, whether or not the person elects to respond to questions. Distribution of the Privacy Act Statement is mandatory. No change may be made in the language of a HUD-approved statement without prior Headquarters approval.

25-8 INSPECTIONS OF REPLACEMENT HOUSING. Inspections of housing (replacement housing of displaced persons and permanent housing of those permitted to remain) are also essential in the monitoring process. In addition to interviews as described in paragraph 25-7 above, at least one housing inspection should be carried out for every three to five case files reviewed. If it is not possible to inspect housing, the reviewer should explain the circumstances in the monitoring letter.

When inspecting housing units, the reviewer shall consider whether the program participant inspected the housing before or after initial occupancy; the qualifications of the program participant's housing inspector; and whether any housing deficiencies were found by such inspector.

Housing inspections should include an interior and exterior inspection of the replacement dwelling. If it is not possible to make an interior inspection, the reviewer shall explain the circumstances in the monitoring letter.

If possible, a local housing inspector should accompany the reviewer on the inspection. If the replacement dwelling is determined not to be decent, safe and sanitary, the inspector shall be asked for his or her best judgment as to whether the deficiencies found resulted from inadequate maintenance by the present occupant(s) or could have existed at the time the property was initially occupied. Any housing deficiencies identified during the inspection that present a threat to the health and/or safety of the occupant which did not result from inadequate maintenance by the present occupant must be reported immediately to the program participant and appropriate follow-up actions taken to correct the deficiency. Where it is found that the displaced person was initially relocated to a replacement unit that was not comparable or decent, safe and sanitary, the program participant shall be required to take steps to correct the deficiencies or relocate the occupant to other housing that is decent, safe and sanitary.

25-9 DETERMINATION OF SPECIFIC CASE FINDINGS AND CONCERNS. The reviewer should identify program participant accomplishments, as well as successful management/implementation/evaluation techniques that might be replicated by other CPD program participants (see Paragraph 1-5). Findings of noncompliance are defined in Chapter 1 of this Handbook (see Paragraph 1-6.C) and classified as either correctable or noncorrectable violations (see definitions below). The reviewer will monitor compliance with URA and the program participant shall take whatever corrective action is necessary to comply with the Uniform Act and the URA implementing regulations at 49 CFR Part 24. Corrective actions may also be applied in accordance with applicable program regulations.

NOTE: When making findings, the reviewer should cite not only the URA regulations, but also the appropriate program regulation. See Attachment 1 for a

list of programs covered by the URA and their program-specific relocation citations.

- A. Correctable Violation. A correctable violation is a violation for which meaningful remedial action to correct the error is possible (e.g., it is not too late to provide appropriate assistance). Generally, correctable violations fall into two categories:
1. Inadequate Financial Assistance. In any case where a person has not received the full amount of the payment(s) to which he or she is entitled, the program participant shall be directed to pay the difference between the required payment(s) and the actual payment(s) made.
 2. Inadequate Housing. In any case where a person has relocated to, or remained in, housing that does not meet the regulatory standards because decent, safe and sanitary housing was not made available to the person, the program participant shall be directed to either assist the person in relocating to decent, safe and sanitary housing or take action to ensure the substandard condition of the person's current housing is corrected through rehabilitation or repair of the unit to acceptable housing code standards and/or through obtaining reasonable modifications of policies in replacement housing (e.g., permitting assistance animals as a modification to the owner's pet policy) and larger units to accommodate a live-in aide, medical equipment, or service animal.
- B. Noncorrectable Violation. All findings for which the required remedial action would not benefit the affected person in a meaningful way (i.e., payments, housing and significant services were adequate) are classified as "noncorrectable violations." For example, a finding that the displaced person was not provided a required notice in a timely manner prior to displacement but relocated into comparable (affordable, decent, safe and sanitary) housing and received the relocation payments and important services which he or she was entitled, would be classified as a noncorrectable violation. The program participant shall be advised of all noncorrectable violations and instructed to take steps to prevent similar violations in the future.
- C. Preparation of Findings. Based on all available information, including the examination of the case files, interviews with former owners and tenants, the inspection of housing and any comments of program participant staff, the reviewer shall enter his or her findings, if any, for each case on the applicable monitoring exhibit. In those instances where the reviewer does not have sufficient information or requires assistance to make a particular finding, the reviewer shall initiate action to obtain such information or assistance. If unable to obtain sufficient information to clearly establish a particular finding, the reviewer shall so indicate on the particular Exhibit.

It is important that the reviewer's judgment reflect an analysis of all available information and that any findings of noncompliance are well documented. Statements made by a person interviewed must be weighed against the information available in the program participant's records and the comments of program participant staff. Supporting information shall be attached to the monitoring exhibit, as appropriate.

Findings related to noncompliance with the URA and/or section 104(d) should cite both the applicable regulation (49 CFR Part 24 and 24 CFR Part 42, respectively) and the HUD program regulations that make these requirements applicable (see Attachment 1).

- D. Concerns. Concerns are defined in Chapter 1 of this Handbook (see Paragraph 1-6B). For purposes of this Chapter, an example of a concern would be an individual case file for a displaced residential occupant that contains a claim form for a replacement housing payment which is not properly completed nor signed by a program participant official. Failure to correct concerns could result in future findings.

25-10 EXIT CONFERENCE WITH PROGRAM PARTICIPANT STAFF. At the close of the monitoring, the reviewer shall follow the process described in Chapter 2, Paragraph 2-7D, of this Handbook and conduct an exit conference with appropriate representative(s) of the program participant to explain the preliminary review findings, concerns and observations and provide the program participant with the opportunity to respond. This approach should minimize misunderstandings that might otherwise occur when the program participant receives the follow-up letter explaining the results of the monitoring. The reviewer shall explain any violations of statute and/or HUD regulations and needed corrective actions that must be taken. Specifically, the reviewer should discuss the following with the program participant:

1. Number and type of case files reviewed.
2. Number of dwellings inspected.
3. Number of persons interviewed.
4. The number and type of findings made (correctable and noncorrectable violations).
5. Required corrective action.
6. Deadline(s) for corrective action.
7. Reviewer concerns and recommendations.
8. Program participant needs for training and/or technical assistance.

25-11 POST MONITORING ACTIONS.

- A. Monitoring Letters. Monitoring letters covering monitoring conducted by a Regional Relocation Specialist shall follow the procedures outlined in Chapter 2 of this Handbook. Such letters are to be drafted by the Regional Relocation Specialist routed for required concurrences, signed by the CPD Director in the Field Office or his/her designee, and dispatched within 45 calendar days of the completion of the review. Copies should be provided to the CPD Representative handling the program area covered or to the appropriate staff in the Office of Housing or the Office of Public and Indian Housing, if applicable.
- B. Regional Relocation Specialist Concurrence. When a Regional Relocation Specialist is part of a team monitoring or, in the case where findings are made independent of the Regional Relocation Specialist, the Regional Relocation Specialist shall concur in any findings and recommendations originating from the CPD Field Office prior to dispatch of the letter.
- C. Corrective Actions/Sanctions. HUD program participants certify to compliance with the URA as a prerequisite to receiving HUD financial assistance. The URA requirements are incorporated by reference into the regulations of covered programs (see Attachment 1). (HUD Notices of Funding Availability and grant agreements may also incorporate URA and other relocation-related requirements by reference.) As with any other program violation, HUD has the authority to take remedial or corrective actions permitted under the applicable program statute, regulations, and/or grant agreement.

Sanction authority rests with the HUD program office. The Headquarters program office that is directly impacted by non-compliance with relocation and real property acquisition provisions is to be consulted when Field Office attempts to correct identified deficiencies have not been successful and more progressive sanctions may be needed. The Regional Relocation Specialist plays a consultative role in sanctions only.

25-12 REVIEW OF STATE-ADMINISTERED PROGRAMS. This Paragraph 25-12 covers the review of programs where HUD provides assistance to a State (program participant) and the State distributes the assistance to third parties (recipients). In these programs, the Regional Relocation Specialist is required to periodically monitor the performance of the State to determine whether the program is in compliance with applicable law and regulations. These programs include the State Community Development Block Grant (CDBG) Program and State-administered HOME programs.

- A. Nature of Review. A monitoring exhibit for reviewing a State program is found in Exhibit 25-8. A monitoring review of a State program consists of:

1. The review of information available in the HUD Field Office (e.g., complaints);
 2. The review of records at the State; and
 3. The on-site review of at least one State recipient, preferably one that has been reviewed previously by the State. When an on-site review of a recipient is undertaken, State officials must be given the opportunity to participate in the review. See Paragraphs 25-4 through 25-11 for procedures for conducting a review of a recipient
- B. Review of State Recordkeeping. State records should include evidence demonstrating that copies of the URA and section 104(d) regulations (49 CFR Part 24 and 24 CFR Part 42, respectively) and guideform materials (e.g., information booklets and claim forms) were provided to recipients with relocation, real property acquisition, or rehabilitation activities, along with the name(s) and phone number(s) of the State staff to contact for advice. State records should also include:
1. Evidence that State has obtained a certification from each State recipient that it will comply with:
 - a. The URA and 49 CFR Part 24; and,
 - b. The pertinent section of the applicable program regulations. For the CDBG and HOME Programs, this includes a certification that the recipient is following a residential anti-displacement and relocation assistance plan.
 2. Evidence demonstrating that State approval of a grant or loan reflected consideration of the real property acquisition and displacement, if any, for the proposed project and a reasonable estimate of relocation costs.
 3. Evidence demonstrating that State monitoring reviews of recipients were sufficient to determine compliance with applicable laws and regulations. This includes evidence that reviews:
 - a. Were of appropriate depth and frequency. (All recipients should be reviewed at least once before closeout.)
 - b. Reflected representative samples as to number and type of cases examined.
 - c. Included interviews with displaced persons/former owners and inspection of replacement housing, as appropriate.

- d. Assessed timeliness and completeness of each required notice (e.g., general information notice, notice of nondisplacement, notice of eligibility for relocation assistance, 90-day notice and vacate notice).
- e. Evaluated recipient's determination of occupants' eligibility for relocation assistance as "displaced persons."
- f. Determined adequacy of referrals to comparable replacement housing and suitable business locations and other advisory services.
- g. Determined whether displaced minority persons were provided an explanation of their Fair Housing Rights and referrals to housing not in an area of minority concentration.
- h. Determined timeliness and accuracy of relocation payments. The State records should include a worksheet or copy of the claim form for each case examined. If payment was limited by the cost of a comparable replacement dwelling, the review record should identify the location of, cost of, and the date of referral to such housing.
- i. Determined that any persons who were temporarily relocated received appropriate compensation in accordance with 49 CFR 24.2(a)(9)(ii)(D).
- j. Examined the process by which the recipient selected appraisers and determined the acceptability of their appraisals and review appraisals.
- k. Determined that the recipient's acquisition process met applicable law and regulations (e.g., invited owner to accompany appraiser, promptly offered just compensation for property and paid all incidental expenses).
- l. Verified that affected persons received the relocation and acquisition payments (e.g., copy of signed settlement statement or cancelled check and verification through personal interview).
- m. Determined that recipient decisions on appeals/complaints were acceptable and persons were informed of right to appeal to the State program participant.
- n. Determined adequacy of the State recipient's recordkeeping.
- o. Statement of State policy describing the scope of appeals that displaced persons/property owners may make to the State and evidence of appropriate State response to appeals/complaints actually filed.

- C. Frequency of HUD Monitoring Reviews. A State program should be monitored based on CPD's risk analysis process (see Chapter 2, paragraph 2-3). The size of the State workload, the level of compliance found during prior visits and the demonstrated capacity of State staff should also be considered. If practical, relocation/acquisition monitoring reviews should be coordinated with an on-site visit made by the CPD Program Representative. Plans for monitoring should be included in the annual monitoring schedule.
- D. Exit Conference With State. At the close of the review, the reviewer shall meet with appropriate State staff, explain the review findings and observations, if any, and provide the State staff with an opportunity to comment. This approach should minimize misunderstandings arising when the State receives the monitoring letter explaining the results of the review. Any noncompliance with applicable law or regulations, and any corrective actions that must be taken to resolve the matter shall be explained. The exit conference may also serve as an opportunity for scheduling a time to provide training or technical assistance to the State.
- E. Field Office Follow-up. The reviewer shall draft a monitoring follow-up letter to the State reporting the results of the monitoring review in accordance with Paragraph 25-11.

25-13 CHAPTER ATTACHMENTS AND EXHIBITS. This Chapter contains three Attachments and eight Exhibits.

A. Attachments.

1. Attachment 1 is a list of HUD-assisted programs subject to the requirements of the URA and/or section 104(d).
2. Attachment 2 is a Privacy Act Statement, which is to be used when the reviewer interviews displaced persons, occupants permitted to remain in occupancy, and/or former property owners (see Paragraph 25-7).
3. Attachment 3 contains Guidelines for HUD Monitoring Review of Appraisals.

B. Exhibits. The Exhibits described below are to be used to document the review of individual cases. These Exhibits are designed to assist the reviewer in carrying out the review and promote consistency in the reviews conducted. The Exhibits should be supplemented with supporting information as necessary to document findings and to facilitate the preparation of the report.

1. Exhibit 25-1: Guide for Review of Relocation and Real Property Acquisition Policies and Procedures. This Exhibit is to be used to review overall program participant compliance with policies and procedures.
2. Exhibit 25-2: Guide for Review of Relocation and Real Property Acquisition Projects. This Exhibit is used to summarize the project(s) being monitored.
3. Exhibit 25-3: Guide for Review of Relocation of Residential Displaced Person – Individual Case File. This Exhibit is to be used to document monitoring review of cases where a residential occupant has been displaced.
4. Exhibit 25-4: Guide for Review of Relocation of Nonresidential Displaced Person – Individual Case File. This Exhibit is to be used to document monitoring review of cases where nonresidential occupants have been displaced.
5. Exhibit 25-5: Guide for Review of Relocation of Residential Occupant Not Displaced – Individual Case File. This Exhibit is to be used to document reviews of cases where a person occupies a residential site that has been rehabilitated and/or acquired without the intention of or necessity to displace the person.
6. Exhibit 25-6: Guide for Review of Nonresidential Occupant Not Displaced – Individual Case File. This Exhibit is to be used to document reviews of cases where a person occupies a nonresidential site that has been rehabilitated and/or acquired without the intention of or necessity to displace the person.
7. Exhibit 25-7: Guide for Review of Real Property Acquisition. This Exhibit covers a single acquisition transaction. **NOTE:** If the reviewer is not qualified to complete information regarding the appraisal review, the reviewer should make a general check using the guidelines in Attachment 3 to this Chapter, Guidelines for HUD Monitoring Review of Appraisals, using Exhibit 25-7. If the review discloses anything which in the judgment of the reviewer raises sufficient questions as to warrant further review by a HUD staff person more qualified to assess the acceptability of the appraisals, the reviewer shall notify his or her supervisor.
8. Exhibit 25-8: Guide for Review of Relocation and Real Property Acquisition Activities of State CDBG Grantees and State HOME PJs. This Exhibit is to be used when monitoring a State CDBG or State HOME program.