



Effective Anti-Displacement Strategies to Safeguard Communities During Recovery

Day 2, May 8, 2024
4:00 p.m.-5:00 p.m. CDT

2024 CDBG-DR Problem Solving Clinic
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Learning Objectives

- Attendees will explore the framework of pre and post disaster conditions that contribute to vulnerability to displacement before and after a disaster event.
- Attendees will learn about actionable strategies and tools to minimize displacement.
- Attendees will learn about holistic approaches to preserving the fabric of disaster-affected communities through engagement, planning, housing preservation and development, targeted assistance, and vital public services.



Agenda

- Framing the Conversation
- Tools and Strategies
- Residential Anti-displacement and Relocation Plan (RARAP) and Beyond
- Resources



Framing the Conversation

What is Displacement?

- Involuntary relocation
- Displacement affects:
 - Individuals
 - Households
 - Small businesses
 - Community institutions
 - Communities
- Why do people leave?
- When do people leave?

Displacement: The involuntary relocation of residents and other institutions from their homes and communities because of external factors.

What is Displacement?

Residential migration

The movement of households from their habitual residence to other housing

Displacement (Involuntary migration)

The forced movement of households from their habitual residence,

as triggered by:

Disasters

due to geophysical and weather-related hazards

Conflict & violence

due to bombardments, threats of armed attack, gang harassment

Other categories

due to development projects, evictions, policies, etc.

Voluntary migration

The voluntary movement of households (e.g., economic opportunity)

Sudden onset

Emerges quickly (e.g. earthquakes)

Slow onset

Emerges gradually (e.g. droughts)

Source: [Household Displacement and Return in Disasters: A Review](#)

What are General Factors to Displacement?

- **Financial:** Rising costs and inability to afford to remain in one's community of choice, particularly for low-income residents, small businesses, and marginalized populations
- **Accessibility:** The availability of accessible housing for vulnerable populations, including people living with disabilities and seniors
- **Economic:** Lack of availability of employment opportunities
- **Community and services:** Hospitals, grocery stores, community centers, places of worship, availability of businesses catering to specific needs
- **Safety:** Concerns over public safety
- **Environmental:** Pollution, natural hazards, lack of green space

Gentrification: A process by which lower-income neighborhoods are transformed such as through:

- Higher-income households moving in
- Improvements to the physical building environment are made
- New businesses and institutions arriving

Grantee Spotlight



Rebuild By Design

International design competition to find innovative solutions for resilience following Superstorm Sandy.

“RBD Project-level planning should examine potential displacement of residents, businesses, and other entities due to potentially increasing costs of rent and property ownership in the years following the completion of the RBD Project (e.g., gentrification). Consideration should also be given to actions for mitigating the impacts of such displacement.”

What Does Displacement Look Like in the Context of a Disaster?

- Prior to a disaster:
 - Evacuation
- Immediately after a disaster:
 - Mass or non-congregate sheltering
 - Relocation with friends or family
 - Relocation to other rental housing in the impacted or a host community
- Longer term or permanent displacement after a disaster due to:
 - Inability to rebuild with available resources because of increased construction costs and/or availability of funds
 - Increased rental costs and reduced supply of available housing

Impacted Community:

The locality directly affected by the impacts of a disaster

Host Community:

A locality that is not directly affected by a given disaster and that receives and hosts a significant number of displaced people

Grantee Spotlight

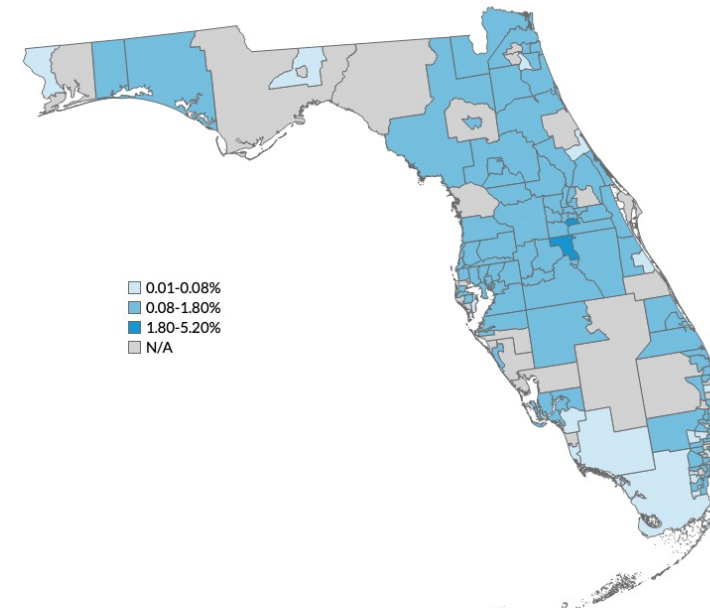


Puerto Rico - Hurricanes Maria and Irma

Significant numbers of Puerto Ricans re-located to the mainland US, especially to Central Florida, following Hurricanes Maria and Irma in 2017.

Example of Multi-Agency Resource Center established in Orlando, FL, to coordinate response efforts for relocated Puerto Ricans. Coordination is essential: Host communities outside CDBG-DR jurisdictions may not receive DR funds, and DR recipients may not be able to invest outside their areas. Coordination across jurisdictions and access to other resources are both needed.

Most Hurricane Maria Climate Migrants Were Concentrated in Central Florida



Source: Urban Institute credit bureau data featured in Breno Braga and Diana Elliott, *The Effect of Climate Migrants on the Financial Well-Being of Receiving Communities* (Washington, DC: Urban Institute, forthcoming).
 Note: The map identifies the share of Hurricane Maria migrants from Puerto Rico in the US in 2019 at the PUMA level.

What are Specific Actions that Mitigate Disaster Displacement Following a Disaster?

- Stabilization is not a means to itself; the goal is to lay the foundation for longer-term recovery
- Sheltering
 - To meet the immediate needs of the displaced population
 - Congregate and non-congregate shelters
 - Shelter-in-place
- Transition to longer-term housing solutions
- Wrap-around services to support displaced population
- Goal of return
- Connection with FEMA Lifelines
 - Food, Water, Shelter
 - Health and Medical

Stabilization: Actions undertaken to make something more secure or stable. In disaster recovery, the focus is on short-term response in terms of achieving critical goals like access to food, water, and shelter.

Barriers in Disaster Recovery that Contribute to Displacement

The recovery effort itself can have an impact!

- Resources
 - Low-income residents without significant resources to contribute to their own recovery vs. those with means
- Self-advocacy
- Pace of recovery
- Program design
- Gentrification through recovery and mitigation projects
- Inability to afford flood or homeowners' insurance, property taxes after a disaster

CDBG-DR grantees have the obligation “to minimize displacement of persons or entities, and assist any persons or entities displaced, and ensure accessibility needs of displaced persons with disabilities” (Consolidated Notice III.C.1.f.)

Challenges in Finding Housing After a Disaster

- General shortage of affordable housing
- Vacancies
- Waitlists for Section 8 or public housing units
- Damaged public housing units
- Lack of essential services or lack of access to road
- Financial distress
- Availability and cost of construction materials and skilled labor
- Supply chain
- Demand for housing rental unit increases and replacement units are not available
- Supply constraints through reduced availability of suitable locations



The Ability to Withstand Displacement Threats is Linked to Resilience

- “**Resilience** is defined as a community’s ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks.” (Consolidated Notice III.C.1.i.)
- **Social vulnerability** is the relative ability of an individual, household, or community to respond appropriately to threatening conditions. Lack of income, lack of transport, age, disability, minority status, lack of information, and numerous other factors can contribute to social vulnerability.
- **Community resilience** occurs when there are policies and practices that holistically promote social cohesion, create a culture of preparedness, foster sound public health, and allow for various community partnerships to work together preparing for and recovering from a disaster.

Alternatively, **Resilience:**
The ability of an individual, family, organization, system, or community to effectively recover from a disaster



Tools and Strategies

Data and Analytics: Community Engagement

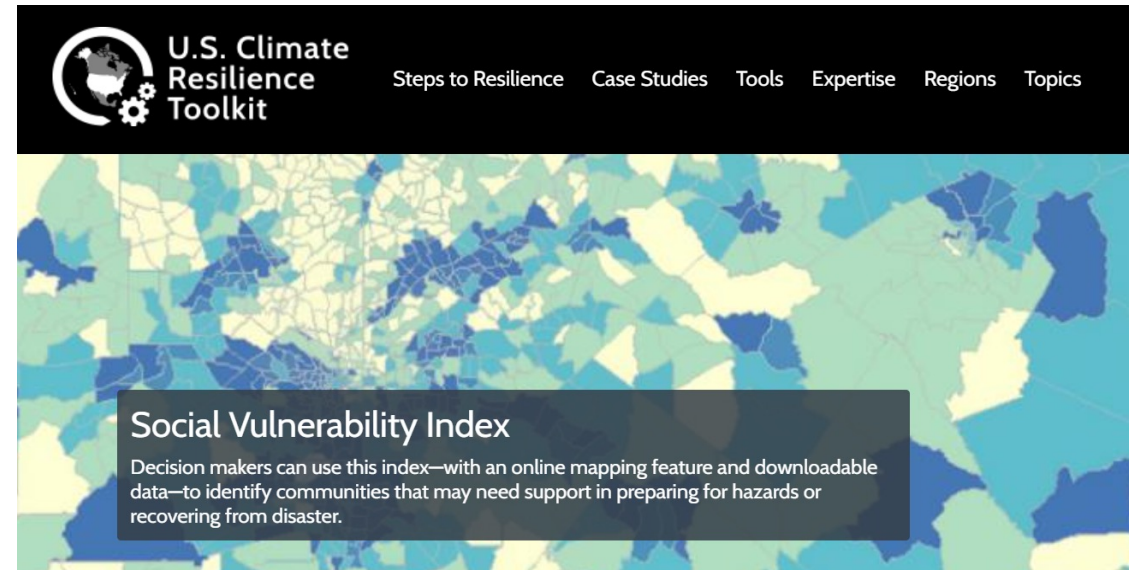
- Engagement with non-profit, culturally specific, and government partners informs:
 - Challenges faced by disaster-impacted households and business owners who:
 - Continue to struggle to recover, but are still living in the impacted community
 - Are vulnerable to the impacts of future hazards in their current location
 - Have temporarily relocated to host communities
 - Are at increased risk of being permanently displaced
 - Organizational, individual, and systemic capacity limitations that can exacerbate these challenges
 - An understanding of where and why individuals and households are still displaced
 - Expand upon data collected through Mitigation and Unmet Needs Assessments
 - **How can program/project design and assistance address these challenges?**

Data and Analytics : Social Vulnerability

- **Social vulnerability:**



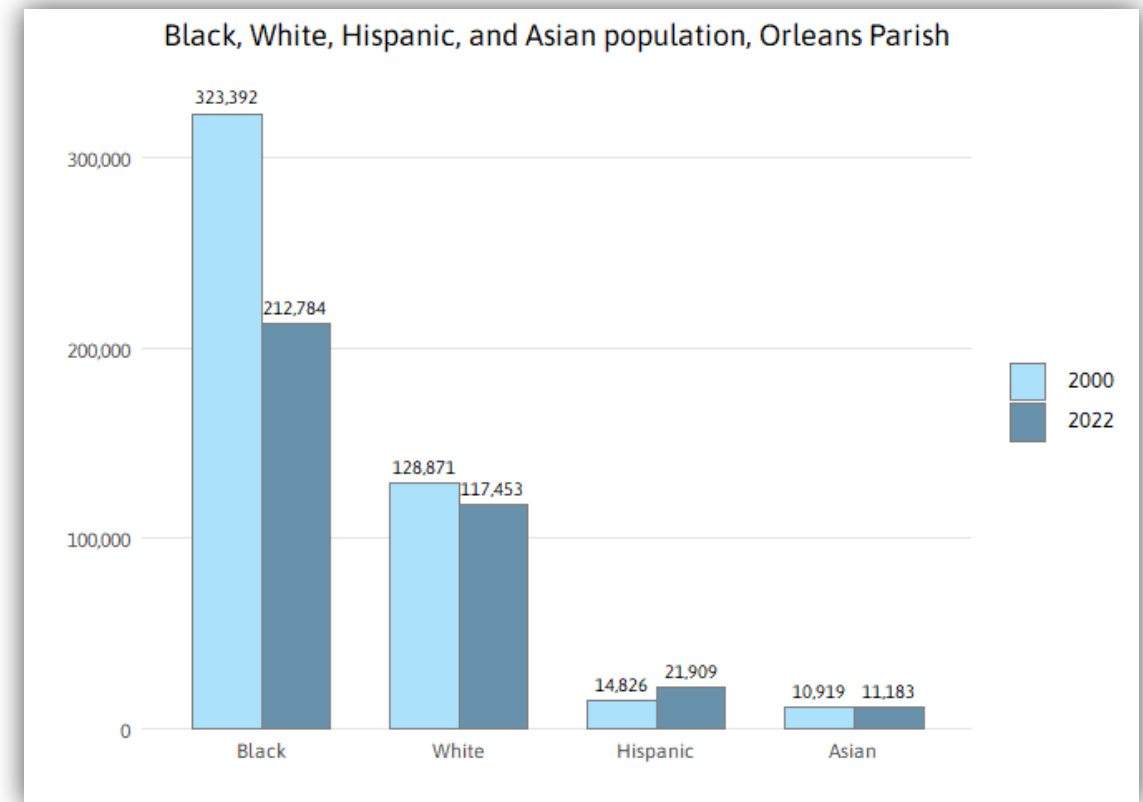
- The potential negative effects on communities caused by external stresses on human health.
- Can indicate the susceptibility of social groups to the adverse impacts of natural hazards, including disproportionate death, injury, loss, or disruption of livelihood,
- The [Social Vulnerability Index](#) (SVI) score represents the relative level of a community's social vulnerability compared to other communities at the same level.
- Reducing social vulnerability can decrease human suffering and economic loss.



Data and Analytics: Understanding Outcomes from other Disasters



- Organizational Spotlight: [The Data Center](#) is an independent nonprofit providing data on Southeast Louisiana.
- Table (right) from "[Who Lives in New Orleans and Metro Parishes Now?](#)"
Source: *The Data Center analysis of U.S. Census Bureau data from Census 2000 and Population Estimates 2022.*
- Other sources of data for tracking displacement: airport visits, cellular data usage, social media data.



Using Data and Analytics to Shape Policy: FEMA IA Example



- Multiple reports and assessments of FEMA IA identified potential of increasing likelihood of vulnerable populations being displaced and/or not recovering from disasters.
- FEMA implemented policy changes, including:
 - **Ways to increase participation:** Expanding forms of documentation to prove ownership/occupancy for homeowners and renters.
 - **Expand shelter in place options:** Provide financial assistance to people with disabilities, including for ramps and grab bars to make damaged homes functional, even if not present before the disaster.

September 2021

FEMA EXPANDS OPTIONS TO PROVE WHERE YOU LIVE

Now accepting additional forms of documentation required for both renters and homeowners

Why the update? To advance equity for disaster survivors, ensuring more underserved communities can access disaster assistance. When FEMA is not able to verify documentation, the two categories below are now available to survivors.

Current Options	Expanded Options
<ul style="list-style-type: none"> • Lease or housing agreement • Rent receipts • Utility bill (electric, water/sewer, etc.) • Pay stub • Bank, credit card statement • Driver's license, state issued identification card, or voter registration card • Public official's statement 	<ul style="list-style-type: none"> • Documentation can now be dated within 1 year prior to the disaster or within the 18-month period of assistance • Medical provider's bill • Social service organization documents (e.g. Meals on Wheels) • Motor vehicle registration • Affidavits of Residency or other court documentation • Letter or mail delivered to your address from an employer, public official, social service organization, local school or school district, mobile home park owner or manager

If you have questions, please call: 1-800-621-3362 or visit: [fema.gov/after-applying](https://www.fema.gov/after-applying)

In rare occasions where FEMA cannot verify where survivors live and documentation listed above cannot be provided, a caseworker will help survivors explore this last resort option:

- Self-declarative statement from mobile home or travel trailer owner that meet FEMA requirements

Planning

- Design programs and projects that:
 - Reduce the risk of current and future hazards to vulnerable populations and individuals with limited mobility
 - Deliver critical services to displaced individuals
 - Address the needs of vulnerable populations to help them remain in or near the impacted community
- Incorporate ongoing community engagement throughout the grant and assess whether policies are reducing or increasing displacement
- Understand the needs and conditions of impacted and host communities to deliver critical services to displaced individuals and/or facilitate return to impacted communities

Grantee Spotlight

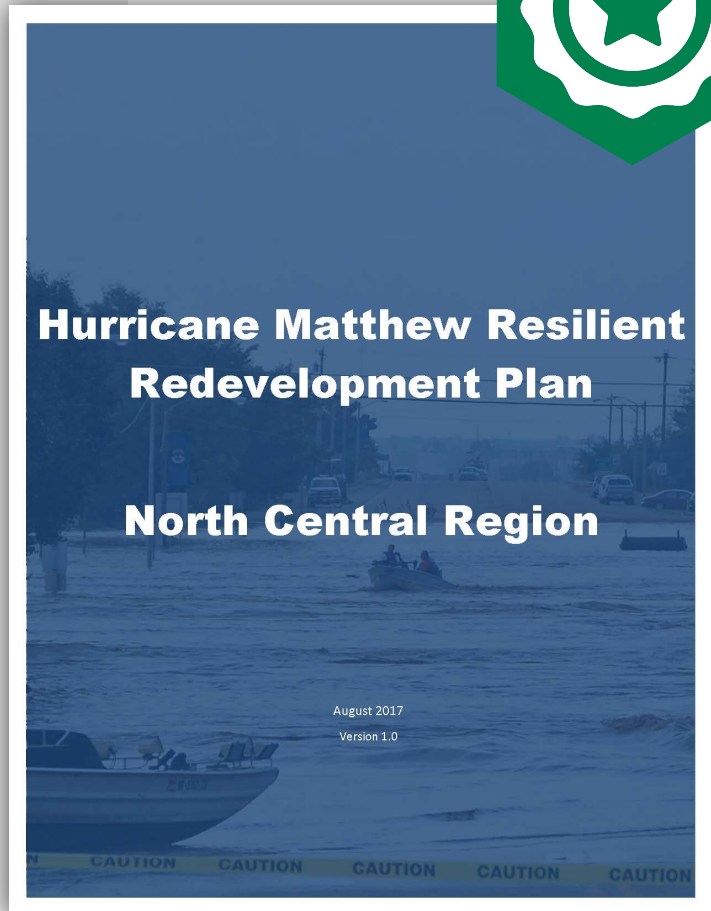
- **North Carolina – Hurricane Matthew Resilient Redevelopment Plan**

Strategic plans developed for 50 impacted counties, with specific projects and programs, summarized into 4 regions.

Identified unmet needs for implementing the plans and pursue CDBG-DR and other funds,

Engagement process was a critical aspect of the planning work.

Source: [Hurricane Matthew Resilient Redevelopment Plans | Resiliency | ReBuild NC](#)

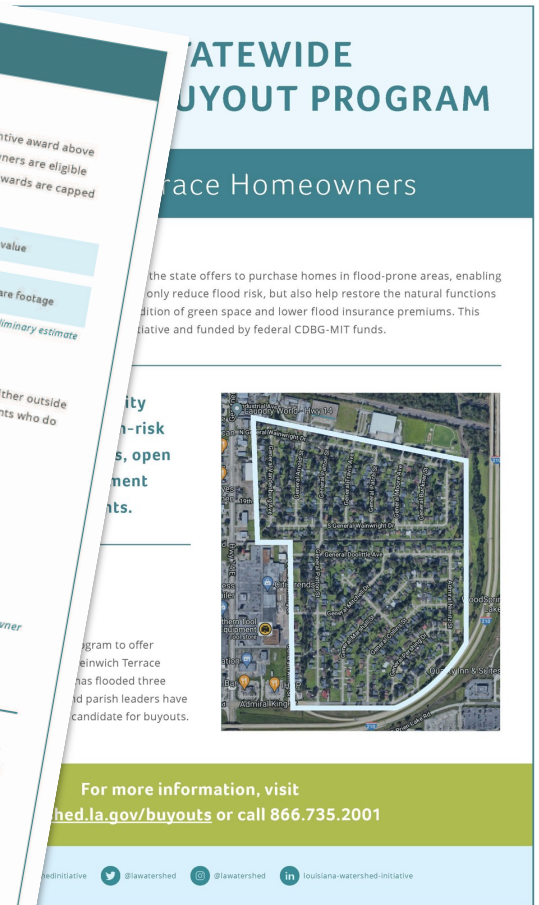


Housing Assistance, Development, and Preservation

Post Disaster Displacement Risk	Example CDBG-DR Program Solution
Increased rental costs from (temporary) increased demand for rental housing	Rent subsidies for displaced LMI renters and homeowners (requires waiver from HUD for CDBG-DR beyond 3 months)
Rising construction costs and/or inadequate funding available to rehabilitate damaged homes in disaster-prone areas	Multifamily and single-family rehabilitation programs that incorporate green and resilient building standards
Inadequate affordable or accessible housing stock	New development of affordable and accessible rental or homeownership housing that incorporates green and resilient building standards
Impacted vulnerable populations living in high-risk areas	Elevation, structural mitigation, and/or buyout programs, coupled with relocation assistance and housing counseling to help impacted residents move to lower-risk areas within the impacted community

Grantee Spotlights: Housing and Public Services Programs

- NJ DCA: Tenant Based Rental Assistance Program
- LA OCD: Buyout + Incentive Program



Economic Revitalization

- Economic and employment stability helps vulnerable individuals remain in the disaster impacted community.
- Businesses that provide goods or services for local consumer needs preserve a sense of community and encourage residents to stay or return.
- Apprenticeship and training programs can create economic stability and allow those impacted by a disaster to contribute to a community's recovery.

- Grantees must **prioritize** underserved communities that have been impacted by the disaster and that were economically distressed before the disaster.
- Prior includes: Opportunity Zone, Promise Zone, CDFI designation, and other.
- Grantees must **document** how they prioritize these communities.

Source: Consolidated Notice, II.D. Economic Revitalization and Section 3 Requirements on Economic Opportunities

Economic Revitalization

Post Disaster Displacement Risk	Example CDBG-DR Program Solution
Post disaster reduced revenues make it difficult for businesses and microenterprises to stay operational	Small business and microenterprise assistance to bridge a period of market instability and help retain jobs and keep businesses in the community
Businesses in commercial corridors in underserved communities struggle to access post disaster assistance, which cause recovery delays and risk business closure or sale	Commercial corridor small business redevelopment and assistance programs that focus on retaining and/or expanding existing businesses
Displaced residents lose their jobs and/or industries are impacted by disaster	Workforce development programs to help displaced and vulnerable populations gain the skills needed to work in the impacted community after the disaster

Infrastructure Projects: Environmental Justice and NEPA



- **[Executive Order \(EO\) 12898](#) Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**
- Use this framework to also evaluate how a proposed project/program increases or reduces vulnerabilities to displacement following basic EJ steps
 - Consider the composition of the affected area to identify minority populations, low-income populations, or Indian tribes
Recognize interrelated cultural, social, occupational, historical, or economic factors in assessing impacts
 - Develop public participation strategies to overcome linguistic, cultural, institutional, geographic, and other barriers to meaningful participation
 - Assure meaningful community representation in the process

Source: adapted from [Community Guide to Environmental Justice and NEPA Methods](#)



Residential Anti-displacement and Relocation Plan (RARAP) and Beyond

- **Preserve Community**
- **Prevent Displacement**
- **Advisory Assistance**

Minimizing Displacement

Mandates* to:

- Minimize displacement
- Provide additional financial assistance to lower income tenants
- Replace affordable housing demolished or converted to other uses
- Certification of RARAP


Intention:

- HUD's goal to ensure sponsored community development efforts do not inadvertently lead to the displacement of individuals when it can be prevented.
- ***General policy for minimizing displacement.*** Grantees shall assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of activities assisted.
- No specific format but planning and implementation are required.
- The Consolidated Notice expands requirements for minimizing displacement and RARAP.
- Some examples of steps and strategies are included in the Guideform for RARAP.

*Section 104(d) of the HCDA, implementing regulations at 24 CFR 42.325(b). See also 24 CFR 570.606.

Interactive Exercise: Instructions

- On your tables, you will find **Index Cards**.
- On each card, write down actions that you, your organization, or your community can undertake.
- You can start writing down your ideas and proposals now.
- We would like to hear from you directly. If you are comfortable sharing, please come to one of the microphones at the end of the presentation.

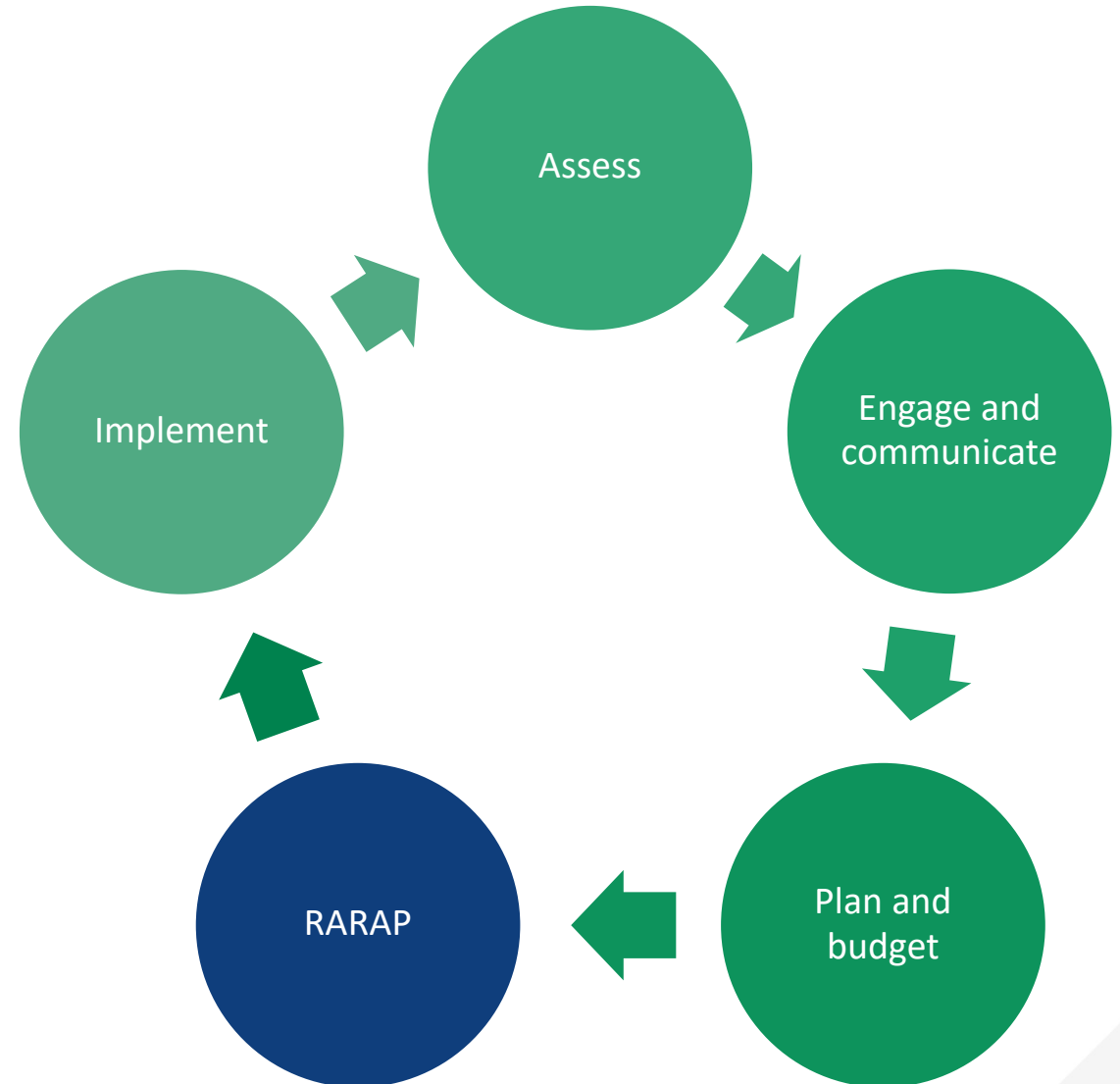


What can you do to
minimize
displacement in
your communities?

Suggested Process to Identify Steps to Minimize Displacement:

GOALS:

- **Preserve Community**
- **Prevent Displacement**
- **Advisory Assistance**





Assess



Identify Risk and Understand Demographics.

- Community input
- Vulnerable subgroups
- Living conditions, livelihoods, and mobility patterns
- Affordable housing inventory
- Community challenges and participants eligibility
- Existing resources
- State/Local rules and protocols
- Staffing and training needs
- Ongoing assessment

Engage and
communicate

Engage Stakeholders and Communicate Plans!

- Leverage local knowledge and experience
- Identify stakeholders
 - Non-profits
 - Community groups
 - Impacted residents
 - Marginalized populations
- Federal partners
- Host meetings/workshops
- Listen, listen, listen!
- Develop a plan





Plan and budget

Plan and Budget for Required Moves!

- Prioritize temporary over permanent displacement
- Minimize disruptions (handle with care!!!)
 - ✓ Access to work, education, medical, transportation, community support & services
 - ✓ Consider special needs and challenges (e.g. age, disability, other)
- Prioritize resilience
- Allocate resources
 - Advisory services
 - Temporary
 - Optional
 - Permanent Relocation
 - Housing of last resort
- Flexible budgets and timelines





RARAP Tailored for DR and MIT Programs!

RARAP
for DR

- Anti-displacement strategies to preserve the community.
- Assistance provided to minimize adverse impacts for those that must move
 - ✓ Important to address the specific needs of each vulnerable subgroup
- Ensure community has an appropriate supply of affordable housing.
 - ✓ Section 104(d) waivers or one-for-one replacement when waivers are not applicable

*Incorporate anti-displacement and "**handle with care**" frameworks into DR/MIT program's policies and actionable procedures*

Minimize displacement strategies into actions:

Assessments, engagements, plans and budgets will help inform each DR and MIT program specific policies & procedures and also project-specific anti-displacement/relocation plans and timelines.

A large green circle is positioned on the left side of the slide, containing the word "Implement" in white text.

Implement

Anti-displacement Strategies for Rental Housing:

- Track occupancy!
- Phased rehab is encouraged to prevent permanent displacement.
- Coordination with occupants to schedule and communicate stages of rehabilitation.
- Measures to minimize noise, dust, and other inconveniences to occupants.
- Alternative temporary accommodations, if necessary, during specific stages.
- Rehabilitation completed efficiently and within planned timeline.
- Regularly assess progress and adjust schedule and strategy as needed.
- Open communication with occupants (focus on vulnerable populations) and address concerns and issues.
- Project manager is trained on HUD relocation (URA, 104(d), optional), local landlord-tenant rules, fair housing and grantee anti-displacement strategies.
- Required moves? Request a written relocation plan.

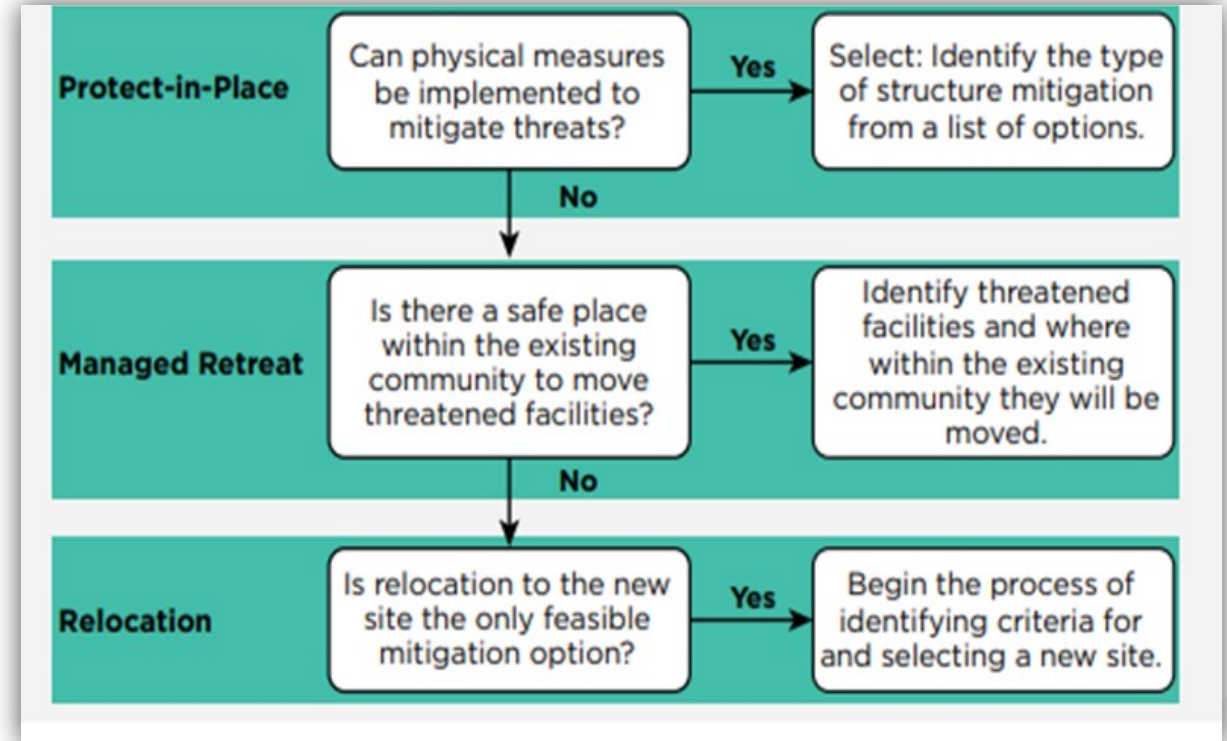
Enforce through written agreements!

What Happens When Displacement Cannot be Avoided?

When displacement is the only alternative:
Minimize adverse impacts of displacement
where minimizing displacement is not reasonable, feasible, or cost efficient and would not help prevent future or repetitive loss.

Descriptions shall focus on programs/activities that may result in displacement and the relocation assistance that will be provided to those displaced (including URA, 104(d), optional relocation assistance, as well as any other assistance authorized by the Notice such as safe housing incentives).

Owner-occupants: optional or programmatic relocation
 Tenants: displaced persons for URA purpose



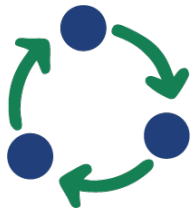


Resources

Reducing Administrative Burden Takeaways



- Information collected early in the Action Plan development and program launch phases helps inform ongoing outreach to individuals and households vulnerable to displacement



- Utilize Anti-displacement strategies. These are not just planning requirements; they make your implementation easier. They are plans that help inform specific offerings and services.



- Engage community members in their own recovery and devise collaboratively plans to address risks and vulnerabilities.

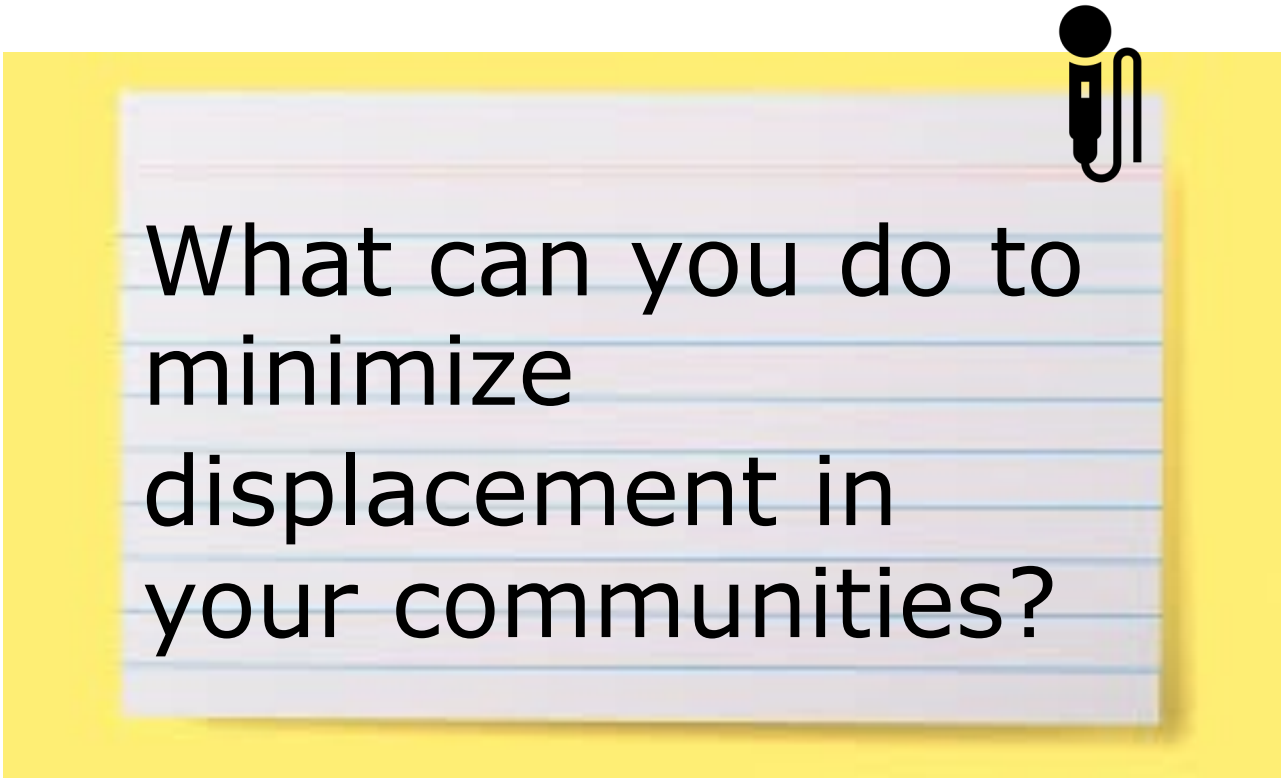


Resources

- [Human Service Needs and Disaster Displacement – Mathematica / HHS Administration for Children and Families, Office of Planning Research, and Evaluation](#)
- [Guideform Residential Antidisplacement and Relocation Assistance Plan \(RARAP\) \(hud.gov\)](#)
- [Social Vulnerability Index | U.S. Climate Resilience Toolkit](#)
- [EPA Strategies to Minimize Displacement – Brownfields](#)
- [5 Anti-Displacement Tools and Strategies | Charlotte Future 2040 Comprehensive Plan](#)
- [Consolidated Notice \(2022-2023 Grantees\)](#)
- [Climate Resilience Implementation Guide: Community-Driven Relocation \(hudexchange.info\)](#)
- [Healthy Community Design, Anti-displacement, and Equity Strategies in the USA](#)
- [Citizen Participation & Equitable Engagement Toolkit](#)

Interactive Exercise: Instructions

- Find the **Index Cards** you wrote your ideas down from earlier in the session.
- If you are comfortable sharing, please come to one of the microphones to briefly share your ideas.



What can you do to minimize displacement in your communities?

A photograph of the St. Louis Gateway Arch is framed within a white, irregular hexagonal shape on the left side of the slide. The arch is a large, white, catenary-shaped structure that dominates the skyline. In the background, other city buildings and the American flag are visible under a clear sky.

Thank You!

If you have any questions, please feel free to send an email to ODR's Policy Division at ODRPolicyDivision@hud.gov.

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