



FEMA Preliminary Damage Assessment Guide

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FEMA

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CHAPTER 1: ORGANIZATION

Purpose

The primary purpose of the Federal Emergency Management Agency (FEMA) *Preliminary Damage Assessment Guide* (PDA Guide) is to define a standard national-level framework for how state, local, tribal, and territorial¹ (SLTT) government officials and FEMA staff collect, validate, quantify, and document the cause, location, and details of damage following a disaster. This standard framework will support emergency management officials at all levels of government by encouraging consistent, efficient, and accurate preliminary damage assessments (PDA) that align with Stafford Act Presidential disaster declaration request requirements. To achieve this, the PDA Guide outlines a common concept of operations, defines major roles and responsibilities, recommends methodologies, and establishes national-level damage assessment standards and procedures. The following overarching objectives of the PDA Guide are designed to ensure disaster recovery assistance is delivered expeditiously to individual survivors and communities affected by an event:

Key Terms

Terminology pertaining to the PDA process is derived from FEMA Public Assistance (PA) doctrine and other federal guidance. Key terms that appear throughout this document are “preliminary damage assessment,” “initial damage assessment,” “joint preliminary damage assessment,” “recipient,” “applicant,” and “subrecipient.”

Preliminary damage assessment – A mechanism used to determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and communities as a whole. There are two types of PDAs: initial damage assessments and joint preliminary damage assessments.

Initial damage assessment – The effort by local authorities to collect data related to the extent of damage within a jurisdiction.

Joint preliminary damage assessment – The coordinated effort by local, state, and federal authorities to validate damage data previously identified by state and local authorities to inform Presidential disaster declaration requests and federal disaster grant determinations.

Recipient – A non-federal entity (e.g., state, tribal, or territorial government) that receives an award from a federal agency to carry out an activity under a federal program.

Applicant – A non-federal entity that applies to be a subrecipient of assistance under a recipient’s federal award (e.g., local government agency, housing authority, or private nonprofit [PNP] organization).

Subrecipient – An applicant that receives a sub-award from a recipient to carry out part of a federal program.

¹ Federally recognized tribal governments may choose to collaborate with state governments for joint PDAs (in preparation to be a subrecipient or recipient) or may engage with FEMA directly for joint PDAs (in preparation to be a recipient).

- Promote accuracy by clearly defining the information and documentation that FEMA requires to assess damage and support requests for Stafford Act assistance;
- Promote efficiency by supporting emergency management officials at all levels of government with the structure, information, and resource requirements needed to streamline damage assessment efforts; and
- Promote a uniform approach by standardizing the processes and criteria used to assess damage to residential homes and offering clear guidance on assessing damage to infrastructure.

Topics Covered by the PDA Guide

Roles and responsibilities: Roles, responsibilities, and the concept of operations related to the damage assessment framework and standards for teams supporting the joint PDA process.

Damage assessments and information collection: Common types of damage assessments and the appropriate methods for obtaining information for each type.

FEMA's information requirements: Information and documentation commonly requested by FEMA during the joint PDA process in support of a request for a Presidential disaster declaration.

Scope and Applicability

PDA's can provide important information for many aspects of the disaster response and recovery process. However, the scope of the PDA Guide focuses on damage assessments that support a request for federal assistance through a Presidential disaster declaration. The PDA Guide answers the following questions for state, tribal, and territorial governments² seeking FEMA assistance:

1. What information does FEMA need from the damage assessment?
2. How should that information be collected?
3. What standards does FEMA have for validating damage?

The intended audience of the PDA Guide includes the following:

1. Local and tribal government emergency managers who conduct initial damage assessments (IDA) and participate in joint PDA's;
2. State, tribal, and territorial government emergency managers who validate IDAs and participate in joint PDA's; and
3. FEMA staff who participate in the joint PDA process and provide technical assistance to SLTT governments on the damage assessment process.

The PDA Guide will touch on some of the elements of the disaster request process, but it should not be used as a substitute for the *Individual Assistance Program and Policy Guide*

² The governing body of an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe under the Federally Recognized Indian Tribe List Act of 1994 (42 U.S.C. 5122).

(IAPPG) or the *Public Assistance Program and Policy Guide* (PAPPG). The PDA Guide does not provide comprehensive information on Individual Assistance (IA) and Public Assistance (PA) eligibility requirements, or training for IA or PA PDA team members.

Using the PDA Guide

This PDA Guide was designed to be used as a preparedness resource for SLTT governments before starting the PDA process and an operational reference that can be used in the field to support PDA coordination. The first two chapters of the PDA Guide establish a foundation and context for the PDA process and establish a common concept of operations. Chapters three and four provide operational guidance that is specific to conducting IA PDAs and PA PDAs, respectively.

Each region and SLTT government should evaluate its need to develop supplemental guidance to address all unique considerations that are missing from the national-level framework outlined in the PDA Guide. Some considerations that may impact the approach and methodology for a PDA process include differences in disaster types, damage levels, and SLTT government operational capacities.

Tribal Specific Guidance

Tribal governments have more options than state, local, and territorial governments for how they choose to request disaster assistance from FEMA. Tribal governments can choose to participate in state Presidential disaster declaration requests as either subrecipients or recipients. Additionally, the Sandy Recovery Improvement Act provides federally recognized tribal governments the authority to request their own major disaster declaration or emergency declaration from the President. Because of this flexibility, tribes have the option to participate in the PDA process in different ways. The PDA Guide will highlight those differences, when possible, and then refer tribal governments to Appendix D: Tribal-Specific Considerations for more detail, as appropriate. The following is a brief overview of how the PDA Guide may work for tribes.

1. State declaration approach: When a tribe wants to participate in a state Presidential disaster declaration, it should assume the roles and responsibilities of a local government, conducting IDAs and sending the data to the state for verification.
2. Tribal declaration approach: When a tribe wants its own Presidential disaster declaration, it should assume the roles and responsibilities of a recipient. This includes conducting IDAs and sending the results and a joint PDA request directly to FEMA.
3. Approach unclear: When a tribe is unsure how it wants to proceed, it should strongly consider participating in the state PDA process, knowing it could decide to request its own joint PDAs and Presidential disaster declaration at all times.

Supersession

This document supersedes the 2016 *Damage Assessment Operations Manual* and other specific provisions pertaining to the PDA process in doctrine and guidance circulated prior to the publication date of the PDA Guide. This document provides the most updated and authoritative information on PDAs and is applicable to any PDA that occurs on or after June 8, 2020.

Authorities and Foundational Documents

Foundational documents provide statutory, regulatory, and executive guidance for FEMA PDAs. Specific authorities relevant to the PDA process include the following:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, 42 U.S.C. §§ 5121 et seq.
- Title 44 of the Code of Federal Regulations (CFR), “Emergency Management and Assistance.”
- Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et seq.).
- *Sandy Recovery Improvement Act*, January 2013.
- Presidential Policy Directive 8 (PPD-8), “National Preparedness,” March 30, 2011.
- Homeland Security Presidential Directive 5 (HSPD-5), “Directive on Management of Domestic Incidents,” February 28, 2003.
- *National Response Framework* (NRF), October 2019.
- *National Incident Management System* (NIMS), October 2017.
- *National Disaster Recovery Framework* (NDRF), June 2016.
- *National Mitigation Framework*, June 2016.
- *FEMA Publication 1*, November 2019.
- “Use of the United States National Grid (USNG),” FEMA Directive 092-5.
- *Incident Management and Support Keystone* (IMSK), January 2011.
- *Individual Assistance Program and Policy Guide* (IAPPG), FP 104-009-03, March 2019.
- *Public Assistance Program and Policy Guide* (PAPPG), FP 104-009-2, June 2020.
- *Individual Assistance Declarations Factors Final Guidance*, June 2019.

The contents of this document do not have the force and effect of law and are not meant to bind the public. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.³

³ Executive Order 13891, 84 FEDERAL REGISTER 55235 (October 9, 2019).

Figure 1 shows the linkages between the PDA Guide and related FEMA Office of Response and Recovery (ORR) doctrine.

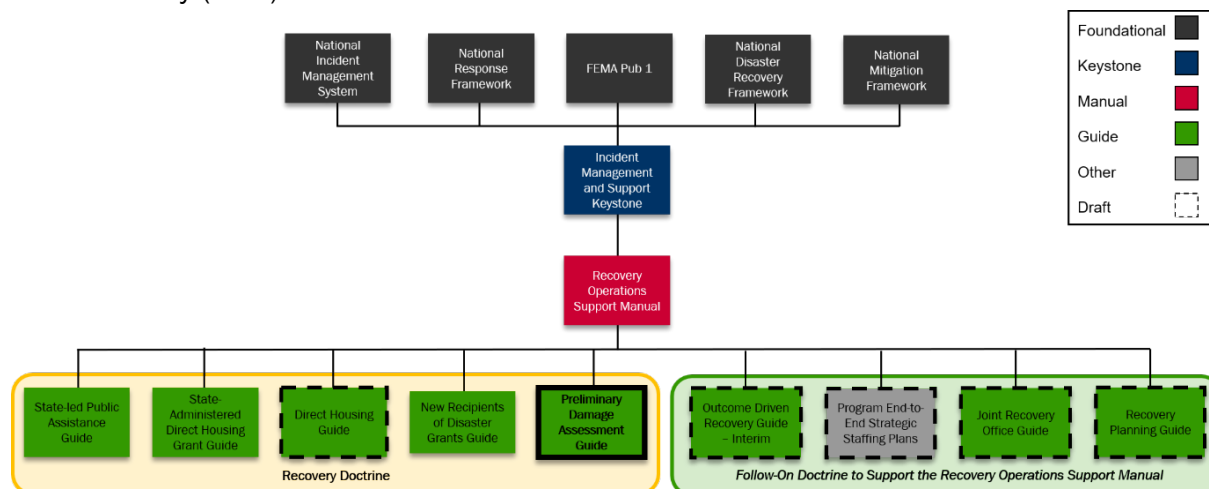


Figure 1: FEMA Doctrine Hierarchy

Document Management and Maintenance

FEMA ORR's Doctrine and Policy Office is responsible for the management and maintenance of this document. Comments and feedback from FEMA personnel and stakeholders regarding this document should be directed to the ORR Doctrine and Policy Office at FEMA headquarters (HQ).

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CHAPTER 2: DAMAGE ASSESSMENT OVERVIEW

A Presidential disaster declaration through the Stafford Act triggers FEMA's broad statutory authority to provide federal disaster assistance. Disaster assistance programs authorized in a Presidential disaster declaration may include (1) the IA program: assistance to individuals and households; (2) the PA program: assistance to SLTT governments and eligible private nonprofits (PNPs) for debris removal, life-saving emergency protective measures, and restoring public infrastructure; and (3) the Hazard Mitigation Grant Program: assistance for mitigation activities to protect against future hazards.

Damage assessments—one step in a larger federal assistance process—provide a general picture of the impacts of a disaster and inform a request for a Presidential disaster declaration. The data collected is used to inform the FEMA regional administrator's validation and recommendation (RVAR). This section provides the context in which PDAs occur, including key objectives of the PDA process, roles and responsibilities for PDA execution, and why and how they may vary across different disaster scenarios depending on geographical considerations and the severity and magnitude of impacts.

Figure 2 demonstrates the linkages between the PDA process and the Presidential disaster declaration process. Refer to the [FEMA Declaration Process](#) for additional information on FEMA's Presidential disaster declaration process.

FEMA Disaster Assistance

FEMA's disaster assistance programs help governments and survivors respond to and recover from federally declared disasters.

Individual Assistance provides federal awards to individuals and households, as well as SLTT governments, to support individual disaster survivors. Joint PDAs allow impacted governments to identify and assess disaster damages to determine whether jurisdictions will request an IA major disaster declaration.

Public Assistance provides federal assistance to support communities' recovery from major disasters by providing them with grant assistance for debris removal and life-saving emergency protective measures and for restoring public infrastructure. Joint PDAs are conducted to identify disaster-related damage and determine whether jurisdictions are eligible for PA.

Hazard Mitigation Grant Program assistance helps communities implement hazard mitigation measures following a major disaster declaration in the areas of the state, tribe, or territory to reduce the risk of loss of life and property from future disasters.

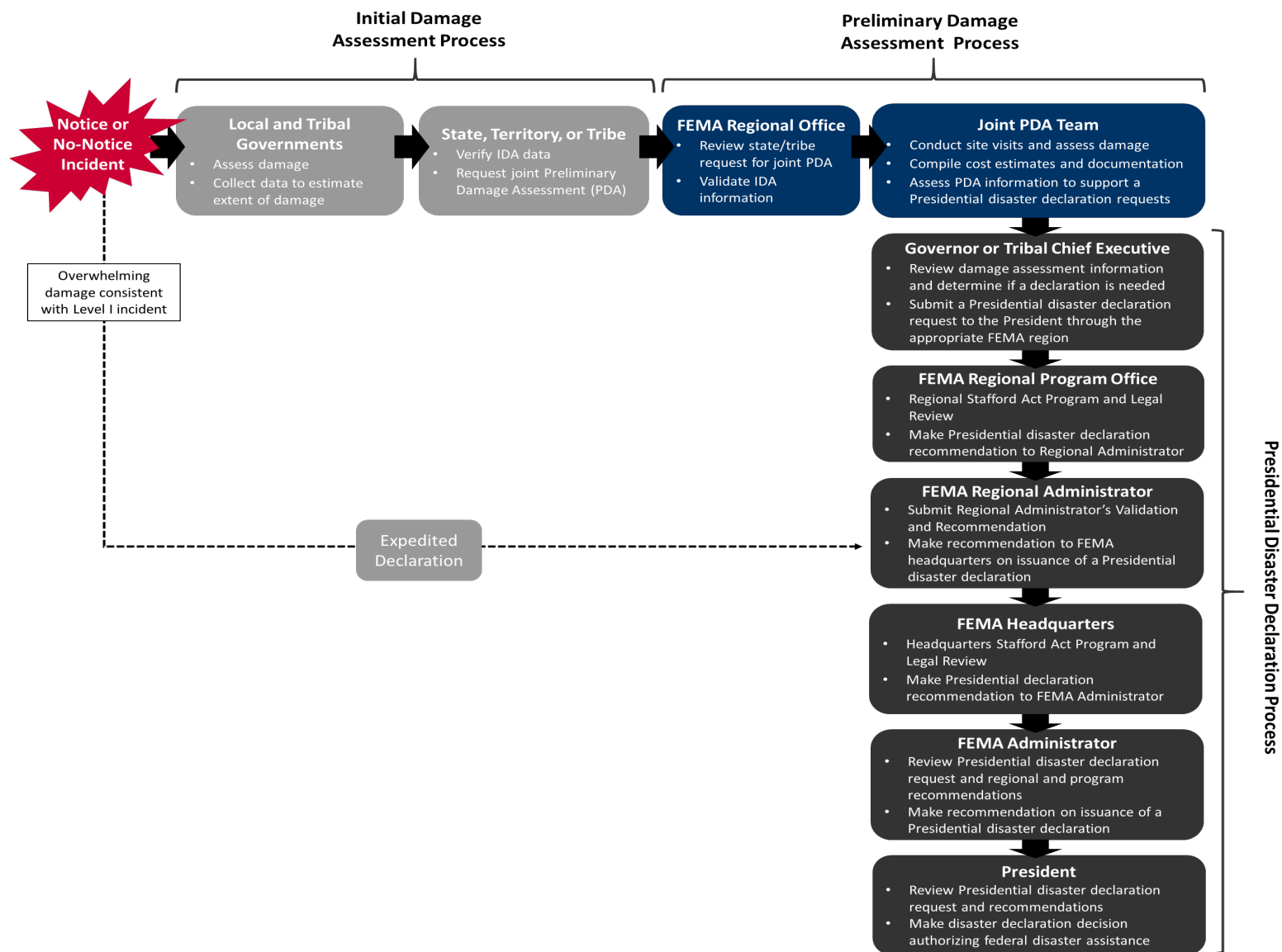


Figure 2: PDA and Presidential Disaster Declaration Process Linkages

Key Objectives of the PDA Process

The primary objective of the PDA process is to help disaster-impacted SLTT governments and the Federal Government determine whether the impacts of a disaster warrant a Presidential disaster declaration. Presidential disaster declarations specify whether jurisdictions are eligible for FEMA disaster assistance and what types of assistance are available.

The data collected during the PDA process (Figure 2) is primarily intended to inform a state, tribal, or territorial government's decision to request a Presidential disaster declaration and the Federal Government's assessment and adjudication of the request.

Chapter 3: Individual Assistance Damage Assessments and Chapter 4: Public Assistance Damage Assessments provide program-specific information on PDA-related requirements and process steps.

Key Considerations

There are common factors that impact the implementation of PDAs for IA and PA. Table 1 identifies the key considerations and describes the impact they have on the PDA process.

Table 1: Key Considerations for the PDA Process

Consideration	Description
Hazard/Incident Type	The type, scale, and severity of the incident may influence the required approach and timeline of the preliminary damage assessment (PDA). Safety concerns for responders and PDA personnel or access constraints are also possible depending on the disaster. For example, disasters such as tornadoes and hurricanes may produce readily visible damage that may be assessed through windshield surveys while damages from floods may require more time and resource-intensive door-to-door assessments.
Program Requirements	The Federal Government's information requirements for Presidential disaster declaration requests for Individual Assistance (IA) and Public Assistance (PA), as well as other types of assistance, will impact the damage assessment process.
State/Tribe/Territory Resources, Disaster Frequency, and Experience	The capabilities and capacity of the state, tribal, or territorial government to support the joint PDA may influence which damage assessment methods are used, such as fly-overs, windshield surveys, or door-to-door assessments. The state, tribe, or territory's experience with disasters and familiarity with the joint PDA process may also impact how damage is assessed.
Time Constraints	Based on the needs of the incident, senior leadership will establish a timeline for the joint PDA to be completed. This timeline will impact what methods are feasible for assessing damage.
Geography	Geographic factors may impact the methods used for assessing damage. For instance, whether the damage is concentrated to a specific area or spread

Consideration	Description
	across multiple areas, jurisdictions, or states will influence the methods used for assessing damage.
Tribal Considerations	An impacted tribe's role may affect how the PDA is conducted. An impacted tribe may choose to be an applicant under its respective state's Presidential disaster declaration or request a Presidential disaster declaration directly from the Federal Emergency Management Agency (FEMA) as a recipient.

PDA Roles and Responsibilities

Table 2 provides the general responsibilities for the primary components involved in PDAs. Chapter 3: Individual Assistance Damage Assessments and Chapter 4: Public Assistance Damage Assessments provide information on the specific roles, relationships, and responsibilities damage assessment team members have in the IA and PA damage assessment processes.

Table 2: Key Roles in the Joint PDA Process

Component	Role
Local Government	The local government conducts the initial damage assessment (IDA), shares damage information with the state, and participates in the joint preliminary damage assessment (PDA).
Tribal Government	The tribal government can take on different roles, depending on how it chooses to request disaster assistance from the Federal Emergency Management Agency (FEMA). - A tribe that chooses to participate in a state Presidential disaster declaration request should assume the roles and responsibilities of a local government, conducting an IDA, sharing the information with the state, and participating in the joint PDA. - A tribe that chooses to request its own Presidential disaster declaration directly with the President will need to conduct both the IDA and help FEMA coordinate the joint PDA process. In this capacity, the tribe is responsible for identifying the damage, working with FEMA to determine if a joint PDA should be requested, developing a joint PDA plan, coordinating and scheduling site assessments and/or potential applicant interviews, identifying who should participate in the joint PDA, coordinating transportation and access to damage areas, and then determining if there is enough damage to request a Presidential disaster declaration. Also, in this role, the tribe would be responsible for using PDA data to develop data-driven written requests for Presidential disaster declarations.
State or Territorial Government	The state or territorial government manages the PDA planning process by coordinating with local authorities and the respective FEMA regional office to ensure mutual understanding and expectations. States/territories provide appropriate vehicles, transportation, and/or access to damage. States/territories review damages identified during the IDAs to decide whether to request a joint PDA from FEMA. State and territorial authorities participate in the joint PDA and determine whether to request a Presidential disaster declaration and to collect information to develop data-driven written requests for Presidential disaster declarations.
FEMA Region	The state, tribe, or territory makes a request to the FEMA region for a joint PDA. FEMA regional staff work closely with the state, tribe, or territory to ensure that all necessary information is ready and available before joint PDAs are approved. Once FEMA approves the request, FEMA regional staff participate in the joint PDA and make a data-driven

Component	Role
	recommendation based on declaration factors to FEMA headquarters (HQ) on whether the state, tribe, or territory should receive a Presidential disaster declaration. It is also important to keep in mind that if PDAs are requested or if they will be supported by the FEMA region during a Regional Response Coordination Center (RRCC) activation, the RRCC Recovery Coordinator (RCCD) may coordinate PDAs until such responsibilities are transitioned to another designee.
Joint PDA Team	The joint PDA team consists of federal state, territorial, tribal, and/or local government representatives. The joint PDA team conducts site visits to validate damages identified during IDAs.

PDA Concept of Operations

Except in the case of expedited Presidential disaster declarations, joint PDAs are completed prior to determining SLTT government eligibility for federal disaster assistance. To encourage consistency and efficiency, FEMA has developed a concept of operations that supports maximum flexibility—given the diversity of disasters, their impacts, and the resources available to support them—while standardizing two main practices: (1) FEMA validates damage, it does not identify damage; and (2) FEMA must visually confirm damage or documentation to consider it validated. Impacted communities should follow the basic concept of operations, outlined next, to ensure timely federal assistance:

1. Disaster occurs.
2. Local or tribal government identifies damage.
3. State, tribe, or territory verifies damage.
4. State, tribal, or territorial government requests a joint PDA with FEMA.
5. FEMA and state/tribe/territory validate damage.
6. Validated damage informs request and recommendation for Presidential disaster declaration.

Expedited Declarations

A state may request and FEMA may submit and recommend a declaration request to the President prior to completion of a PDA when the magnitude of anticipated or actual impacts of an incident become unmanageable without national resources. Depending on the extent of damage and accessibility of impacted areas, FEMA may use alternative methods—such as fly-overs or windshield assessments led by a federal official—to validate damage and make the full range of federal assistance available or conduct complete PDA operations at a later date. Refer to FEMA's declaration guidance for additional information on expedited declarations.

A one size-fits-all approach to damage assessments is unrealistic. However, a standard process promotes effective and timely coordination among emergency management officials at all levels. Certain steps may be compressed, executed concurrently, or expedited, depending on the incident requirements and specific incident considerations.

Readiness and Planning for Damage Assessments

Effective planning and preparation are essential to assessing incident damage accurately and efficiently. SLTT governments can better prepare themselves to complete IDAs and to receive FEMA support by working to develop an understanding of the types of information and documentation FEMA needs during the damage assessment process. Table 3 describes activities a state, tribe, or territory may implement to contribute to readiness and planning for damage assessments based on available resources.

Table 3: Pre-Incident Damage Assessment Readiness and Planning Activities

Activity	Description/Benefit
Standard Operating Procedure	Developing a standard operating procedure (SOP) that identifies event triggers and supplements/complements the content of this document. An SOP can help with planning and operational decision making, clarify roles and responsibilities, establish protocols, and streamline decisions following a disaster.
Identify Risks to Critical Infrastructure	Identifying high-risk areas and developing a list of critical infrastructure assets can help expedite analysis following a disaster. Planning and zoning maps, as well as Geographic Information System (GIS) technology, can aid in this effort.
PDA Plan of Action Template	Developing a standard template for joint preliminary damage assessments (PDA) that disaster information can be plugged into, to expedite development of the PDA plan of action. The plan template may be included as an addendum to the SOP.
Assembling the Right Team	Assembling the right team prior to a disaster ensures alignment of available resources for life-saving and life-sustaining operations. In some cases, non-emergency management personnel (who do not have responsibilities immediately following a disaster) can stabilize teams that would otherwise be impacted by diversions of emergency management personnel.
Pre-Positioned Contracts and Memoranda of Understanding	Having pre-positioned contracts or memoranda of understanding for services, including mobile applications, remote sensing, or GIS capabilities, can expedite data collection during the initial damage assessment (IDA).
Training	Offering training to personnel preselected to support damage assessments is important in maintaining pre-incident readiness. Training should ensure staff are familiar with damage assessment plans, SOPs, and protocols.
Exercises	Conducting exercises can help validate protocols and processes, provide staff with opportunities to operationalize plans, and encourage relationship building among FEMA and state, local, tribal, and territorial (SLTT) governments.
Technology	Understanding the technologies available (e.g., aerial imagery and ground-level photography) and ensuring the relevant stakeholders are familiar with the technologies being acquired and used for damage assessments is important for pre-incident readiness.

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CHAPTER 3: INDIVIDUAL ASSISTANCE DAMAGE ASSESSMENTS

FEMA IA programs provide financial and direct assistance to disaster survivors with disaster-caused unmet needs. Support may include assistance for temporary housing and housing repairs, critical disaster-related expenses, the replacement of essential personal property, and funding to the state, tribal, or territorial government for IA program services. Refer to the [IAPPG](#) for more information on IA programs.

For Presidential disaster declaration requests that include IA, state, tribal, and territorial governments must evaluate and document specific information regarding the extent of damage to local jurisdictions. When evaluating the need for IA, FEMA will consider the [following six factors](#) for states and territories:

1. State or territory fiscal capacity and resource availability,
2. Uninsured home and personal property losses,
3. The disaster-impacted population profile,
4. Impact to community infrastructure,
5. Casualties, and
6. Disaster-related unemployment.

For tribes requesting their own Presidential disaster declarations, FEMA will consider the following factors for IA that have been laid out in FEMA's [Tribal Declarations Pilot Guidance](#):

1. Uninsured home and personal property losses,
2. Availability of housing resources,
3. Casualties,
4. Impact to community infrastructure,
5. Disaster-impacted population profile,
6. Voluntary agency and other assistance,
7. Tribal government resources, and
8. The unique conditions that may affect tribal governments.

In order to consider those factors, FEMA requires an assessment of home and personal property losses and an impact statement that includes an analysis of the other variables.

The principal factors FEMA will consider in the evaluation of a major disaster declaration request for IA include the estimated cost of assistance for uninsured homes and personal property losses and resource capability and capacity of the requesting state, tribe, or territory. For additional information on these and other variables considered, see the [Collecting Information for an IA Assessment](#) section in this chapter.

Concept of Operations for IA PDAs

Initial Damage Assessment

The IDA is the basis on which all additional disaster assistance is provided. IDAs capture damage information and impacts and require an understanding of FEMA damage assessment criteria and the ability to identify and document relevant disaster impacts. With information gathered during the IDA, states or tribes can establish a PDA plan of action and make an informed request to FEMA for a joint PDA.

Visually Confirming Damage

It is important to consider that all PDAs must include visual confirmation of IDA damage information for the damage to be considered valid.

When an incident occurs, the state, tribal, or territorial government organizes and coordinates the IDA process with local governments to ensure IA priorities and needs are effectively communicated and captured. During the IDA, the local or tribal government identifies and categorizes the degree of damage to residences in its jurisdiction and records all other information or data that might support the need for additional resources, such as the capacity of local resources to support response and recovery efforts. For more information on FEMA's degree of damage definitions, see Appendix H: Individual Assistance Damage Matrices.

The process for IDAs is as follows:

1. State or territory starts reaching out to its local and tribal governments to initiate the IDA process.
2. Tribal governments start to determine if they want to participate in the state Presidential disaster declaration request or request their own Presidential disaster declaration.
3. Local and tribal government emergency managers activate their damage assessment teams.
4. Local and tribal government emergency managers evaluate 911 data or self-reporting data to determine impact areas to prioritize.
5. Local and tribal governments select and implement their assessment methodology and begin categorizing homes by severity using FEMA's degree of damage definitions.

Tribal Legal Complexities

Tribal governments typically have complexities in legal responsibility for facilities and infrastructure and in ownership of homes (i.e., homes owned by an individual, the tribe, or another government agency or authority) which may impact FEMA program eligibility (i.e., IA vs. PA). A tribal government should attempt to identify home ownership and legal responsibility for damaged facilities and infrastructure prior to a joint PDA. See Appendix D: Tribal-Specific Considerations for more information.

6. Local and tribal governments synthesize and package the IDA data and highlight the biggest impacts.

Local or Tribal Government Sends Data to State/Territory

Following the IDA, the local or tribal government sends its collected data to its state or territorial counterparts to continue the PDA process. If a tribe decides to request assistance separately from a state, the tribe can submit its IDA data directly to FEMA to start the joint PDA process.

State, Tribal, or Territorial Government Collects Damage Information

The impact of disasters and the ability of state, tribal, or territorial governments to support recovery can vary greatly. For this reason, a variety of disaster-related information should be collected to lend substantive data-driven content for requests for Stafford Act assistance. This information should illustrate overall impact and underscore how the unique resources of the Federal Government are necessary to support disaster survivors. States, tribes, or territories may determine IDA data supports the need to request a joint PDA from FEMA to support a Presidential disaster declaration request to access FEMA disaster assistance.

States and territories that receive IDA data from local or tribal governments and state agencies should implement a method for verifying the hardest impacted areas before requesting a joint PDA from FEMA. This form of verification may include reviewing and analyzing photographs of a sample of disaster-impacted homes to ensure that local and tribal governments are categorizing degrees of damage correctly. It may include in-person visits to areas with the most impacts. Verification of IDA information is designed to ensure accuracy, speed, and efficiency when joint PDAs take place with FEMA.

Technical Assistance

Prior to a joint PDA request, the state, tribal, or territorial government may request technical assistance from the appropriate FEMA region to support efforts to evaluate the information submitted by local jurisdictions and/or to analyze the need for a joint PDA.

Technical assistance may include support from the following:

- Geographic Information System (GIS) analysts;
- Regional chemical, biological, radiological, nuclear (CBRN) coordinators;
- Program specialists; and
- Other subject matter experts (SME) necessary to advise state, tribal, or territorial emergency management officials and answer programmatic questions.

State, Tribe, or Territory Requests Joint PDA with FEMA

Once information has been verified and the impacted jurisdictions are prepared, state, tribal, or territorial emergency managers should coordinate with their leadership. If the incident is of such severity and magnitude that resources needed to recover are expected to exceed state, tribal, or territorial government capability, the director of the state, tribal, or territorial emergency management agency may request a joint PDA. The joint PDA request is accomplished through a joint PDA request letter to the appropriate FEMA regional office, which should contain a list of disaster-impacted locations and a basic PDA schedule. FEMA does not impose specific requirements on how states, tribes, or territories conduct IDAs or verify information collected. However, when requesting a joint PDA, the state, tribe, or territory must provide the following information to the FEMA Regional Recovery Division for planning purposes:

- The type of damage to be surveyed, such as private (non-agricultural) and public;
- Location and geographic spread of the damage, urban or rural area, type of terrain, and accessibility to the area;
- Magnitude and severity of damage and all estimates from the IDA;
- Immediate known problems, such as the following:
 - Areas inaccessible because of debris, high water, or damage to streets, roads, and bridges;
 - Serious health hazards;
 - Requirements for emergency protective measures;
 - Damage to critical infrastructure; and
 - Widespread loss of essential utilities and shortages of food, water, medical supplies, and facilities.
- Summary of recent Presidential disaster declarations, including incidents that a Presidential disaster declaration was not granted (historical, geographical, demographic, etc.) that will be in the requested joint PDA; and
- Summary of activities taken by other federal agencies (OFA), if any, for coordination.

After the request but prior to conducting a joint PDA, FEMA will review for accuracy IDA information provided and verified by the state, tribe, or territory. This may include the cause of damage, impacted jurisdictions, location of damage, insurance coverage, and accuracy of the damage categorizations for homes completed by the state, tribe, or territory.

State, Tribe, or Territory Develops PDA Plan of Action

The state, tribal, or territorial government, with assistance or consultation from the region, as requested, is responsible for coordinating with county or local jurisdictions included in the joint PDA request to develop a PDA plan of action. The PDA plan of action helps ensure the efficient assessment of home damage and other IA-related damages. The PDA plan of action should include the following information:

- Methodology for validating degree of damage information (e.g., door-to-door assessments, windshield surveys, or other methods);
- A list of damaged homes and their corresponding degrees of damage (i.e., destroyed, major, minor, or affected);
- A list of homes that are inaccessible;
- Schedule for visiting and assessing damaged homes or neighborhoods coordinated with local governments, prioritizing the most heavily impacted areas and homes first; and
- List of PDA team members and a list of team requirements (e.g., special considerations that may require additional support from FEMA).

FEMA programmatic representatives should coordinate with the state, tribal, or territorial emergency management agency to discuss the verified information submitted as part of the joint PDA request and develop an overall PDA coordination strategy.

The FEMA regional office will identify FEMA joint PDA leadership, deploy staff, and coordinate with OFAs (e.g., the U.S. Small Business Administration [SBA]) needed to successfully complete the PDA. State, tribal, or territorial emergency management officials should identify joint PDA leadership, as well as staff that can serve on joint PDA field teams.

Damage assessment field teams should consist of at least one representative from FEMA and one representative from the state, tribal, or territorial government. A local government representative familiar with the extent and location of damage in the community should be included, if possible. A representative from the SBA also often accompanies, whenever feasible. Other state, tribal, or territorial agencies, OFAs, and non-governmental organizations (NGO) may also be asked to participate, as needed.

Joint PDA

Before PDAs begin, the state, tribe, or territory leads an initial briefing—with support from FEMA—with important information for the joint PDA team (e.g., disaster/impact specifics, team breakdowns, communications and reporting, safety, etc.). After state, tribal, or territorial emergency management officials have communicated the PDA plan of action to local or county emergency management officials, joint PDAs begin. Teams that consist of the appropriate local, state, and federal staff execute joint PDAs in accordance with the state's PDA plan of action. These teams assess and validate IDA information to determine the extent of incident impacts and contribute to decisions on Presidential disaster declaration requests. Further, joint PDA teams collect information on the type and degree of home damages and community impacts to support a request for an IA major disaster declaration.

During the joint PDA, joint PDA teams complete the following steps:

Joint PDA Team Conducts Field Assessments

Local authorities help prioritize sites and locate previously recorded damages during the joint PDA. States, tribes, territories, and FEMA representatives are responsible for validating damages recorded during the IDA through visual confirmation and compiling site visit summaries and damage estimates. Joint PDA field teams are intended to validate—not find—damage and impact information already identified by SLTT government officials.

SLTT Governments and FEMA Compile and Share Data

FEMA and SLTT government staff should coordinate regularly during the joint PDA to discuss findings and reconcile all differences in order to reach a common understanding. While disagreements may exist, it is important that the rationale for decision making be transparent. After the joint PDA teams have viewed all damaged homes identified by the SLTT governments, FEMA will provide state, tribal, or territorial emergency management officials with a final summary of the joint PDA findings, including validated cost estimates. In accordance with the Privacy Act of 1974, FEMA may not share personally identifiable information (PII) with SLTT government staff. FEMA recommends that SLTT government staff maintain their own copies of PDA information.

States, Tribes, Territories, and FEMA Assess and Validate Data

The PDA team will conduct an out-briefing to synthesize all PDA summaries and reach concurrence on damage estimates. States, tribes, territories, and FEMA validate data by assessing whether information is accurate, complete, and sufficiently detailed. The final PDA reports are submitted to state, tribal, or territorial leadership to assist their decision about whether to request a Presidential disaster declaration.

Final PDA reports do not constitute an official eligibility determination for IA. The state, tribe, or territory must submit additional documentation as part of a formal request for a Presidential disaster declaration. FEMA will review this documentation prior to making an eligibility recommendation to the President for providing federal assistance.

States, Territories, and Tribes Evaluate Need for a Declaration Request

The state, tribal, or territorial government reviews damage information validated through the joint PDA. Based on this information, the state, tribe, or territory decides whether to request a Presidential disaster declaration. The governor or tribal government executive makes the request to the President through the FEMA regional administrator (RA).

Request for Presidential Disaster Declaration

Impacted states, tribes, or territories that have decided to pursue a Presidential disaster declaration must submit a Request for Presidential Disaster Declaration (FEMA Form 010-0-13) to their FEMA regional program office within 30 days of the end of the incident period. Requests for deadline extensions must also be submitted within 30 days of the end of the incident period.

FEMA Region Submits Recommendation to FEMA HQ

When the FEMA regional program office receives a request for Presidential disaster declaration from a state, tribe, or territory, the FEMA regional program office reviews the request and validated information developed during the joint PDA. The FEMA RA may request additional information from the state.

The FEMA RA submits a recommendation in the form of the RVAR to the Associate Administrator for the Office of Response and Recovery at FEMA HQ on whether or not the state, tribe, or territory should receive a Presidential disaster declaration.

FEMA HQ Review

Program offices at FEMA HQ review the RVAR and make their own recommendations on whether the state, tribe, or territory should receive a Presidential disaster declaration and attach it to the RVAR for the FEMA Administrator's review. The FEMA Administrator then reviews the request package and attaches the FEMA Administrator's recommendation for submission to the President for a final decision. Refer to the [FEMA Declaration Process](#) for additional information on FEMA's Presidential disaster declaration process.

IA Methodologies for Conducting Joint PDAs

Conducting joint PDAs requires SLTT governments and the Federal Government to balance speed with accuracy. The agreed-upon methodology should be flexible to account for all discrepancies between the scale and scope of damage and the availability of resources to conduct the joint PDA.

Declaration Request Extensions

The Associate Administrator for the ORR may extend the deadline if the governor or the tribal chief executive submits a written request and justification within the 30-day time period. FEMA may grant extensions when additional time is needed to conduct damage assessments if an impacted jurisdiction is as follows:

- Strained by multiple events,
- Conducting continued response efforts, or
- Unable to access impacted areas because of sustained incident conditions (e.g., high water and high winds).

IA Roles and Responsibilities

Roles and responsibilities described in this section are intended to give SLTT government and Federal Government emergency management officials the flexibility necessary to tailor the damage assessment process to resources, threats, populations, and stakeholders while maintaining standardization across the Nation.

While it is understood that not every jurisdiction will have the resources or staff necessary to perform all the tasks outlined in this section, practitioners can use this information to develop a common understanding of damage assessment roles at each level. This uniformity will allow the development of common skills and understanding that underpin mutual aid networks and national uniformity.

Local or Tribal Government Roles and Responsibilities

As a best practice, some local jurisdictions have trained staff from non-emergency management offices to fill important positions. Examples include facilities personnel from public schools, local housing inspectors or code enforcers, local community planning and economic development officials, and offices responsible for maintaining publicly owned buildings or infrastructure. These best practices are implemented at the local, tribal, and county level. Governments may have different position names; however, these roles and responsibilities, as described in Table 4, should be considered as local or county damage assessment teams are defined.

Table 4: Local or Tribal Roles and Responsibilities

Local and Tribal Roles and Responsibilities	
Local or Tribal Damage Assessment Coordinator	- Generally performed by an emergency manager or designee. - Responsible for identifying and training local assessment team members, coordinating assessment activity in the jurisdiction, and submitting information to the county or state or tribal government, as appropriate.
Local or Tribal IA Damage Assessment Team Member	- May be representatives of emergency management, government offices, non-governmental organizations (NGO), Community Emergency Response Team (CERT) programs, or residents. - Should be trained in gathering information related to location, ownership, occupancy, and insurance coverage of impacted residences and categorizing damage according to criteria established by the Federal Emergency Management Agency (FEMA) for Individual Assistance (IA).

State, Tribal, or Territorial Government Roles and Responsibilities

State, tribal, or territorial governments can lessen the time required to verify damage by working with local emergency managers to assess whether the information submitted is complete and aligned with established FEMA damage assessment standards and by providing technical expertise to local damage and impact assessment efforts. State, tribal, or territorial government damage assessment staff serve as state, tribal, or territorial government representatives on both joint PDA leadership and field teams. State, tribal, or

territorial government representatives lead site assessments with FEMA support. These varying responsibilities are described in greater detail in Table 5.

Table 5: State, Tribal, or Territorial Government Roles and Responsibilities

State, Territorial, and Tribal Government Roles and Responsibilities	
State, Tribal, or Territorial Government Damage Assessment Coordinator	- Serves as the principal state, tribal, or territorial representative overseeing damage assessment, verification, and validation activities. - Responsible for ensuring that initial damage assessments are appropriately supported, ensuring state, local, tribal, and territorial (SLTT) government staff are prepared to verify local assessment findings, coordinating with federal representatives during the joint preliminary damage assessment (PDA), and ensuring appropriate support is provided as requests for federal assistance are drafted.
State, Tribal, or Territorial Government IA Damage Assessment Team Lead	- Serves as the state, tribal, or territorial government representative responsible for overseeing damage assessment activity related to the Individual Assistance (IA) program. - Responsible for overseeing technical programmatic support provided during local or county assessment efforts, verifying IA-related information submitted by local or county emergency managers, and serving as the primary state, tribal, or territorial government programmatic representative during the joint PDA.
State, Tribal, or Territorial Government IA Damage Assessment Team Member	- May also be deployed to provide subject matter expertise or other technical support to impacted jurisdictions during the local damage assessment and state, tribal, or territorial government verification phases. - Responsible for representing the state, tribal, or territorial government as part of the joint PDA.
State, Tribal, or Territorial Government Voluntary Agency Liaison (VAL)	- Assigned to support damage assessments; reports to the state, tribal, or territorial government IA damage assessment team lead. - In some instances, the VAL may also perform the duties of the mass care and emergency assistance specialist.
State, Tribal, or Territorial Government Mass Care and Emergency Assistance Specialist	- Responsible for documenting activity and evaluating the capacity of other federal agencies (OFA) and non-governmental organizations (NGO) providing mass care and emergency assistance support. - In some instances, the mass care and emergency assistance specialist may also perform the duties of the VAL.

FEMA Roles and Responsibilities

The FEMA PDA Coordinator is typically the regional IA branch chief or Deputy Regional Recovery Division Director. The FEMA PDA coordinator reports to the FEMA Regional Recovery Division Director. Programmatic team leads assigned to oversee IA program assessments report to the FEMA PDA coordinator and maintain appropriate coordination with the regional IA branch chief (as needed) to ensure programmatic considerations are considered throughout the joint PDA.

When an IA joint PDA is requested, the FEMA Regional Recovery Division Director or IA branch chief identifies an IA PDA team lead. IA PDA team leads are typically senior program specialists or specialists with considerable experience in conducting PDAs. When a joint PDA

is requested by a federally recognized tribal government, close coordination with a FEMA regional tribal liaison will also be required to support culturally appropriate communication with tribal leaders and members. See Appendix D: Tribal-Specific Considerations for more information on the programmatic differences that might be highlighted during a PDA for tribal governments.

As a best practice while conducting PDAs, the FEMA PDA team lead acts as a guest observer and collects the information FEMA needs to continue the PDA process.

The roles and responsibilities outlined in Table 6 will clarify the reporting relationships and job responsibilities for FEMA staff as they relate to the damage assessment process.

Table 6: FEMA Damage Assessment Team Member Roles and Responsibilities

FEMA Damage Assessment Team Roles and Responsibilities	
FEMA PDA Coordinator	- Serves as a single point of contact for recovery program teams doing assessments in the field and ensures team leads are coordinated and supported with and by the regional office. - Assists hazard mitigation and environmental planning and historic preservation (EHP) leads in planning for team members and scheduling. - Designated by the programmatic branch chief or Recovery Director. May perform programmatic PDA team functions simultaneously.
FEMA IA PDA Team Lead	- May also function as an Individual Assistance (IA) preliminary damage assessment (PDA) team member if the PDA is localized and roles can be combined. - Responsible for collecting, aggregating, and archiving joint PDA data from IA field team members, as well as formulating narratives and tables used to document validated damage.
FEMA IA PDA Team Member	- Facilitates the exchange of information with local officials to ensure an accurate and efficient collection of IA damage and impact information. - Responsible for validating damage to homes in the field.
FEMA Voluntary Agency Liaison Crew Leader	- Documents activity and evaluates capacity of government agencies and non-governmental organizations (NGO) providing mass care/emergency assistance care and support. - Responsible for coordinating with NGOs, including Voluntary Organizations Active in Disaster (VOAD) and/or Community Organizations Active in Disaster (COAD) members in order to document activity and evaluate capacity of those organizations.
FEMA Mitigation Point of Contact/Specialist	- Provides information related to the National Flood Insurance Program (NFIP), including information related to flood insurance policies and communities that are not currently participating in the program. - Responsible for identifying mitigation opportunities on a site-specific, community-, state-, territory-, or tribal-wide basis. - Responsible for collecting and compiling relevant mitigation data and information for inclusion in the hazard mitigation PDA narrative.
FEMA External Affairs Specialist	Serves as FEMA's representative to the media for matters related to the joint PDA.

FEMA Damage Assessment Team Roles and Responsibilities	
	Provides intergovernmental affairs support as a liaison between FEMA programmatic specialists and tribal governments via regional tribal affairs advisers.
U.S. Small Business Administration PDA Coordinator	- Serves as FEMA's representative responsible for overseeing the coordination of all U.S. Small Business Administration (SBA)-PDA related activity and ultimately for the efficient and accurate assessment of program-related damage, as defined by SBA standards and policies. - Responsible for collecting, aggregating, and archiving PDA data from SBA PDA team members and formulating narratives and tables used to document validated damage.
SBA PDA Team Member	Responsible for accurately reporting the results of damage and impact validation surveys conducted in the field in accordance with SBA damage assessment guidelines.
Other Federal Agencies (OFA)	Provide information through coordination with the FEMA PDA coordinator or programmatic team lead to help develop efficient and effective damage and impact information.

FEMA Regional Office

The FEMA regional office provides oversight and direction to IA program branch chiefs and other staff throughout the joint PDA process. During the assessment process, FEMA regional office staff process requests for Presidential disaster declarations and make determinations based on the validated PDA information submitted by state, tribal, and territorial governments. The responsibilities outlined in Table 7 clarify the role of FEMA regional office staff.

Table 7: FEMA Regional Office Team Member Roles and Responsibilities

FEMA Regional Office Roles and Responsibilities	
FEMA Regional Administrator	- Has direction, authority, and control over all regional functions and assets, including area offices authorized as a component of the regional office. - Responsible for receiving requests from the state, tribal, or territorial government for Stafford Act declarations; overseeing the development of analysis; and making a recommendation based on information provided in the regional administrators Validation and Recommendation (RVAR).
FEMA Regional Recovery Division Director	- Responsible for providing direction and oversight for components of FEMA's Recovery Division, to include programmatic and technical assistance provided in all phases of the damage assessment process. - Responsible for overseeing the deployment of Regional Division staff required to support state, tribal, or territorial government requests for joint preliminary damage assessments (PDA) and ensuring necessary programmatic information is available during the development of the RVAR.
FEMA Regional IA Branch Chief	- Responsible for providing direction and oversight of the Individual Assistance (IA) program. - Responsible for overseeing the coordination of all actions required of the IA Branch throughout the damage assessment process, including coordination with the state, tribal, or territorial government program leads; mobilization of

FEMA Regional Office Roles and Responsibilities	
	staff and assets; coordination with other federal agencies (OFA), and providing programmatic input for the RVAR.
FEMA Mitigation Division Director, Deputy Division Director, or Delegated Representative	• Manages and directs PDA activities for the Mitigation Division in the region. • Responsible for coordinating with regional recovery leadership to ensure joint PDAs are appropriately staffed with mitigation points of contact and specialists. • Responsible for ensuring the Mitigation Division provides the appropriate level of programmatic input to the RVAR (e.g., by providing a hazard mitigation PDA narrative report).

Damage Assessment Methods

The damage assessment methodology should adapt to information collection, verification, and validation requirements. Different types of incidents may require different approaches and timelines. While disasters like fires, tornadoes, and hurricanes often produce readily visible damage that can quickly be assessed using windshield assessments, fly-overs, or geospatial analysis, other disasters like basement flooding or earthquakes may require more time and resource-intensive door-to-door assessments.

Respecting Tribal Privacy

FEMA will work closely with tribes to determine the best approach to damage assessments that respects the privacy of the tribe and the tribe's spiritual/cultural sites.

IA programmatic damage assessment requirements also influence how disaster damage is assessed. While information required to support an IA declaration may sometimes be gathered quickly with minimal contact with survivors, IA program administration often requires in-depth site assessments, supporting documentation, cost estimates, and direct contact with potential applicants. This may limit the effectiveness of certain damage assessment methods or require that they be used in conjunction with others capable of gathering more granular information.

Table 8 describes common methods FEMA, other federal agencies, and SLTT government partners use to assess IA-specific damage during the PDA process.

Table 8: IA Damage Assessment Methods

Method	Description
Self-Reporting	Self-reporting individual assessment methods are often employed by local or county emergency managers to quickly develop initial damage information. Assessment teams confirming damage should create annotated maps, if possible; tag damages with Global Positioning System (GPS) coordinates; and take photographs of damage used to assess a home as major or destroyed to reduce the time required to verify and/or validate information.
Door-to-Door Assessments	Individual Assistance (IA) damage assessment teams will often use door-to-door assessments during smaller incidents, when damage cannot be otherwise validated, or for validating damage from preliminary damage assessments (PDA) under appeal. Assessment teams conducting door-to-door assessments should take photographs of damage used to assess a home to reduce the time required to verify and/or validate information. Teams should only enter damaged dwellings as a last resort and should do so only with the permission of the occupant and after safety considerations are evaluated by the team.
Windshield Surveys	Assessment teams will record observed damage while driving through impacted areas, periodically stopping to conduct interviews to provide anecdotal evidence related to insurance coverage, occupancy type (owner or renter), general basement construction, and other significant information to support census information collected to develop impact statements. Assessment teams conducting windshield surveys should take photographs of damage used to document a home as major or destroyed to reduce the time required to verify and/or validate information. This process is repeated street by street for the team's assigned area. Representatives from FEMA, the U.S. Small Business Administration (SBA), and the state, local, tribal, or territorial (SLTT) government should always ride together in the same vehicle because multiple vehicles can be intrusive and intimidating for disaster survivors. Additionally, using a single vehicle promotes teamwork and facilitates discussion amongst assessment team members.
Geospatial Analysis and Geographic Information Systems	Geographic Information System (GIS) datasets can be a great asset during IA damage assessments, giving emergency managers the ability to analyze damage to homes and neighborhoods and compare it with imagery before the disaster occurred.
Remote Sensing	Remote sensing, which includes obtaining aerial imagery from fly-overs, is a way to rapidly collect information about structures that sustained major damage or were destroyed. Aerial imagery may be collected with helicopters or fixed-wing aircraft. High-resolution satellite imagery may also be available through the FEMA HQ Remote Sensing Office. Regular full-color imagery can show whether a structure has been damaged. Other technologies, such as light detection and ranging (LiDAR – typically airborne), synthetic aperture radar (SAR – collected via satellite), or multispectral imagery (typically airborne) may provide additional details about the nature of damage. This data may be loaded into a web viewer for easy access. Advanced analytics could be used to automatically identify and categorize damaged structures from imagery.
Modeling	Modeling can be used to rapidly predict damage that is likely to be or likely to have been caused by a disaster and can be used to leverage resources during IA damage assessments. Common modeling products used include hurricane prediction maps (wind speed, rainfall, and storm surge), earthquake shake maps, tornado track maps, Hazards United States (HAZUS), and the Prioritizing Operations Support Tool (POST).

Collecting Information for an IA Assessment

FEMA has several factors it uses to evaluate requests for IA. These factors generally fit into three basic categories: (1) estimated cost of assistance for uninsured homes and personal property loss; (2) fiscal capacity and/or resources of the requesting state, tribe, or territory; and (3) the impact of the incident. The cost of assistance estimate is established by assessing and categorizing the degree of damage of disaster-impacted residences. This calculation is mostly data driven, is calculated with FEMA support, and encompasses a significant portion of a Presidential disaster declaration request. In addition to the cost of assistance calculation, states, tribes, or territories are also responsible for writing a compelling impact statement for the Presidential disaster declaration request package which includes an assessment of SLTT government capacity and resources and an assessment of the impacts of the disaster on the community. This section will first review how to calculate the cost of assistance estimate and then will provide information on what to evaluate in the impact statement.

Assessing Cost of Assistance

Time and access constraints may limit the thoroughness of assessments to homes. When possible, every effort should be made to capture the following information: mapped location information, generally (e.g., jurisdictions impacted) and specifically (e.g., physical addresses or Global Positioning System [GPS] coordinates of damaged dwellings); degree of damage; whether the damage being assessed is flood-related or not; the home type (e.g., manufactured or conventionally built, single-family residence, multi-family residence, etc.); whether homes are owned or rented by disaster survivors (tallied as a total percentage); and whether homes are primary or secondary residences (tallied as a total percentage).

For the purposes of efficiency, FEMA has established four categories of damage that an impacted home may fall within: destroyed, major, minor, or affected. In many cases, the size and needs of the unfolding disaster will not allow PDA teams to conduct a detailed review of each home. On a very basic level, joint PDA teams should use the following standards for categorizing degrees of damage:

Essential Living Spaces

Per the IAPPG, federal assistance is generally limited to essential living spaces. An essential living space is a room within a home that serves the function of a bedroom, bathroom, kitchen, and/or living room that is regularly occupied or used by one or more members of the household and requires repair to bring its functionality back to the home (e.g., kitchens are considered essential as long as there is not another undamaged kitchen in the home).

- Minor: Repairable, non-structural damage to a home or damage from flood waters when the waterline is 18 inches or below in a conventionally built home or when the waterline is in the floor system of a manufactured home.
- Major: Structural damage or other significant damage that requires extensive repairs or damage from flood waters when the waterline is 18 inches or above in a conventionally built home or when the waterline enters the living space of a manufactured home.
- Destroyed: Significant enough damage that the home is deemed a total loss.

If there are fewer constraints on time and access to homes or if the incident is smaller (Level 3), joint PDA teams should validate as much damage as possible to ensure that estimates are accurate, and that federal assistance is required. When the joint PDA team has the opportunity, it can make more nuanced degree of damage determinations by observing or validating other variables, for example:

- The number of essential living spaces flooded,
- The water level (height) in essential living spaces,
- If the waterline has reached electrical outlets,
- Duration of the flood, and
- Contaminants in the water (e.g., oil, chemicals, etc.) which would require special decontamination protocols above standard flood water cleaning procedures.

These variables can affect degrees of damage when validated by FEMA.

Inaccessible Homes

For manufactured and conventionally built homes, inaccessible residences are those in which damage to the home cannot be visually verified because of disaster-related loss of access.

In the case of flooding incidents, flood waters are blocking access to residences by covering, washing out, or destroying roads, bridges, or access routes so that the degree of damage cannot be visually verified. In the case of non-flood incidents, debris from landslides, mudslides, severe soil erosion, or blowdown is blocking access to residences by disrupting or destroying roads, bridges, or access routes so that the degree of damage cannot be visually verified.

If homes can be reached by another route, they should not be considered inaccessible. If the damage is viewable at the time of assessment, the appropriate damage category should be assigned.

If the number of inaccessible homes represents a significant portion of homes assessed, then the PDA team should consider extending their PDA time to allow for a more comprehensive assessment.

This section provides detailed information on the specific types of damage that pertain to each degree of damage category. Not all details need to be validated in order to categorize a

home's degree of damage. For further information on degrees of damage categories, refer to Appendix H: Individual Assistance Damage Matrices.

Manufactured Homes

Affected manufactured homes include residences with cosmetic damage only or residences that do not require repairs to make habitable. Cosmetic damage includes damage to skirting, paint, or a small number of shingles. Damage to a porch, carport, garage, and/or an outbuilding is not eligible for IA and therefore would be considered affected damage. For flooding incidents, the water level from flooding is below the floor system and does not impact habitability (e.g., there is no visible water line, and only skirting is missing or bent).

Minor manufactured homes have sustained damage and require minimal repairs to make habitable. Residences in this category have no structural damage and have not been displaced from their foundations.

For flooding incidents:

- The waterline has reached the floor system but has not entered the living space of the unit. There may be damage to bottom board, insulation, ductwork in the floor system, or heating, ventilating, and air conditioning (HVAC).

For non-flood incidents:

- Some of the nonstructural components have sustained damage (e.g., damaged windows, doors, wall coverings, roof, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC).

Major manufactured homes have sustained significant damage and require extensive repairs to make habitable. Residences in this category have been displaced from their foundations, blocks, or piers and may also have damaged structural components.

For flooding incidents:

- Water has covered the floor system and entered the living space of the unit but is still below the roofline.

For non-flood incidents:

Habitability

FEMA defines "habitable" as safe, sanitary, and functional. "Safe" refers to being secure from disaster-caused hazards or threats to occupants, "sanitary" refers to being free of disaster-caused health hazards, and "functional" refers to an item or home capable of being used for its intended purpose.

- A significant portion of nonstructural components (e.g., roof, wall, and utilities) has sustained significant damage.

Destroyed manufactured homes are total losses. One of the following factors may constitute a status of destroyed, regardless of the cause of damage/disaster type:

- The waterline is at the roofline or higher.
- The residence's frame is bent, twisted, or otherwise compromised.
- Most of the structural framing of the roof or walls has been compromised, exposing the interior.

Conventionally Built Homes

Affected conventionally built homes have minimal cosmetic damage to their exteriors and/or interiors.

For flooding incidents:

- Essential living spaces or mechanical components are not damaged or submerged.
- There is damage to a porch, carport, garage, and/or an outbuilding (which are not eligible for IA).

For non-flood incidents:

- The residence has cosmetic damage, such as paint discoloration or loose siding.
- The residence has minimal missing shingles or siding.
- There is damage to an attached structure (e.g., porch, carport, garage, outbuilding, etc.), gutters, screens, landscaping, and retaining walls or downed trees that do not affect access to the residence.

Minor conventionally built homes have sustained a wide range of damage that does not affect the structural integrity of the residence but could affect habitability.

For flooding incidents:

- The waterline is at 1 to 3 inches in an essential living space. Residences with water lines between 3 and 18 inches should be also categorized under minor damage unless other factors are validated that make the damage major (e.g., duration and contaminants of the floodwaters, location of the electrical outlets, etc.).
- There is damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.)

- There is nonstructural damage to roof components over essential living spaces (e.g., shingles, roof covering, fascia board, soffit, flashing, and skylight).
- There is nonstructural damage to the interior wall components, to include drywall and insulation.
- There is nonstructural damage to exterior components.
- There are multiple small vertical cracks in the foundation and damage to the chimney (i.e., tilting, falling, cracking, or separating from the residence).
- There is damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.).
- There is damage or disaster-related contamination to a private well or septic system.

Major conventionally built homes have sustained significant structural damage and require extensive repairs to make habitable.

For flooding incidents:

- The waterline is above 18 inches or above the electrical outlets in an essential living space. Residences with water lines between 3 and 18 inches should be categorized under minor damage unless factors are validated that make the damage major (e.g., duration and contaminants of the flood waters, location of the electrical outlets, number of essential living spaces affected).

For non-flood incidents:

- There is failure or partial failure of structural elements of the roof over essential living spaces (e.g., rafters, ceiling joists, ridge boards, etc.).
- There is failure or partial failure of structural elements of the walls (e.g., framing, sheathing, etc.).
- There is failure or partial failure of foundation (e.g., crumbling, bulging, collapsing, horizontal cracks of more than 2 inches), and shifting of the residence on the foundation by more than 6 inches.

Destroyed conventionally built homes are total losses (i.e., the damage is so severe that the home cannot be repaired and/or requires demolition). One of the following factors may constitute a status of destroyed, regardless of the cause of damage/disaster type:

- There is complete failure of two or more major structural components (e.g., collapse of foundation, walls, or roof).
- The water line is at the roofline or higher.
- Only the foundation remains.
- The residence has a confirmed imminent danger (e.g., impending landslides, mudslides, or sinkholes).

Insurance Coverage

Capturing an accurate picture of the number of insured and uninsured homes is critical to the damage assessment process. Large numbers of damaged uninsured homes or damaged homes without insurance applicable to the peril may suggest a greater need for supplemental federal assistance. Generally, this information is developed in conjunction with state insurance commissions or through other avenues such as GIS or U.S. Census Bureau information.

To protect the PII of impacted individuals and the proprietary information held by the insurance industry, insurance information is typically aggregated at the county, census block, or ZIP Code level.

In order to estimate the level of applicable insurance coverage, states, territories, and tribes should work with local governments to verify information related to insurance coverage and occupancy status (primary residence, secondary residence, and vacant property). Insurance types that may cover disaster-related perils include the following:

- Homeowners insurance
- Condominium insurance
- Insurance for manufactured homes
- Renters insurance
- Flood insurance
- Sewer backup rider
- Earthquake rider
- Landslide rider
- Subsidence rider
- Tornado rider
- Structural-only insurance
- Fire-only insurance
- Contents-only insurance

Insurance Coverage Specifics

FEMA only considers insurance coverage which includes the peril(s) listed as a cause of damage identified for the disaster when determining eligibility for assistance. An applicant is not required to submit flood insurance documents for a wind-only disaster. When applicants are impacted by multiple perils, FEMA compares insurance benefits and verified loss amount separately for each peril.

Disaster survivors in a special flood hazard area (SFHA) that have previously received assistance and have not maintained their required flood insurance are ineligible for flood-insurable real and personal property assistance from FEMA in future flooding disasters, except for non-insurable losses, such as private bridges, wells, septic, etc. Additionally, if flooding has impacted homes in a community that does not participate in the National Flood Insurance Program (NFIP), FEMA is prohibited from providing assistance to residents in the identified flood plain for damage that would have otherwise been available through the program. FEMA will coordinate with state, tribal, or territorial governments to identify and communicate the status of non-participating communities at the outset of the damage assessment process.

Refer to Appendix I: Individual Assistance Housing Insurance Matrix for additional information on the impacts of insurance coverage.

Assessing Available Resources

In addition to assessing the cost of assistance for uninsured homes and personal property losses, states, tribes, or territories must also do an assessment of several other factors that will ultimately be packaged into an impact statement for a Presidential disaster declaration request.

Federal disaster assistance under the Stafford Act is intended to be supplemental in nature and is not a replacement for emergency relief programs, services, and funds provided by SLTT governments, NGOs, or the private sector. FEMA will evaluate the availability of resources and, where appropriate, all extraordinary circumstances that contributed to the absence of sufficient resources.

State, Tribal, or Territorial Government Assistance Programs

State, tribal, and territorial governments have a responsibility to take care of their citizens. In furtherance of that responsibility, some state, tribal, and territorial governments have developed assistance programs. These programs vary in the amount and type of assistance available, requirements, and funding sources. When a state, tribal, or territorial disaster assistance program may be available to support disaster-related unmet needs, narrative statements should be included in the declaration request to outline the assistance that will be provided and how/if the program may be applied to address needs unmet by the FEMA IA programs. As an example, a state, tribal, or territorial government program may have in place a self-funded assistance program specifically related to disaster assistance or generally available for housing repair or other needs that could be utilized.

Assistance from Voluntary Organizations

Voluntary, faith, and community-based organizations will often provide support to disaster survivors following an incident. Some voluntary organizations perform their own damage assessments to identify disaster survivor needs. These assessments may be helpful to SLTT governments in illustrating the scale and magnitude of the event and all limitations that impact their ability to address survivor needs, thereby highlighting the need for Stafford Act assistance. It is important to note that financial information related to assistance provided by NGOs, including the overall cost of the operation, may be sensitive and is not required for damage assessments.

Cumulative Effect of Recent Disasters

Recent disasters can have a dramatic impact on a state, tribal, or territorial government's ability to recover. For this reason, FEMA considers all disasters that have impacted the state, territory, or tribe within the last 12 months. This is discussed in 44 CFR Part 206.48 (a)(5).

FEMA considers Stafford Act Presidential disaster declarations, as well as state, tribal, or territorial declarations made by the governor or tribal chief executive and the extent to which the state, tribal, or territorial government has spent its own funds to support recovery.

State, tribal, or territorial governments are encouraged to include information related to prior disasters—including the localities designated in the state, tribal, or territorial declaration and specific expenses incurred by the state, tribal, or territorial government—in their request for federal assistance. While not required, additional information related to the ability of the state, tribal, or territorial government to provide support following the disaster being assessed (e.g., the status of state, tribal, or territorial government assistance programs) can be included in impact statements.

Assessing and Demonstrating Impacts

There is no set number of damaged homes that will automatically trigger a Presidential disaster declaration for a state, tribe, or territory. Each disaster must be evaluated individually on the impacts that have overwhelmed the capacity and resources of the state, tribal, or territorial government. During the PDA process, state, tribal, or territorial governments should consider all factors that FEMA uses to evaluate a disaster request and write a compelling impact statement to demonstrate how the impacts of the disaster have generally outweighed the capacity and resources of the impacted governments.

As previously mentioned, state and tribal declaration factors are different. In most cases, the factors used for states overlap with the factors used for tribes, but in some key areas, FEMA uses different evaluation factors for tribal IA declaration requests. For the full details of the factors FEMA uses to evaluate tribal IA declaration requests, refer to Appendix D: Tribal-Specific Considerations.

Privately Owned Access Routes

FEMA may provide financial assistance to repair privately owned access routes (i.e., driveways, roads, or bridges) damaged as a result of a Presidential-declared disaster. Assistance for privately owned access routes is intended to restore access to the owner's primary residence. In instances where multiple households share a privately owned access route, assistance is shared among applicants, requiring additional coordination and documentation between FEMA and the applicants.

Impact Statements

Capturing the impact of damage in a narrative format is a necessary part of the Presidential disaster declaration request process. States, territories, and tribes should remember that information that cannot be included cleanly or easily in the cost of assistance estimate should be documented in an impact statement. Impact statements illustrate the impact of the disaster and can help show whether the disaster is beyond the capacity of the impacted jurisdiction and if supplemental federal assistance is required to recover. Typically delivered in a series, impact statements should include numbers or statistics that lend context to the disaster. These statements, included in the governor's or tribal chief executive's request, are important because the impact of a disaster will be considered, regardless of the cost of assistance estimate. These statements are also important for giving context to potential damages that cannot be assessed at the time, like privately owned access routes.

Example IA Impact Statement

While statistical information provided by the U.S. Census Bureau indicates that homeownership for Washington County is less than 40 percent, the homeownership rate in the area along the Washington River impacted by recent flooding is much higher. Local emergency management has stated that many of these residents have lived in the homes for multiple generations and may be uninsured or underinsured because they do not have a mortgage requirement for maintaining insurance on the property. Based on this input, it is estimated that insurance coverage for the affected homes is approximately 25 percent. As homeowners without insurance, there is likely to be a high eligibility rate for FEMA's Individuals and Households Program (IHP) in this county. Additionally, the local emergency manager stated that up to 10 percent of the impacted homes along the Washington River in this county are not primary residences and are used by residents that spend more than half their year in other parts of the county. These residents are unlikely to be eligible for FEMA assistance.

Documenting Relevant Impacts

Cause of Damage

States, territories, and tribes should verify the cause of damage, which is listed next:

- Earthquake
- Fire
- Flooding (including mudslide)
- Hurricane or typhoon
- Landslide
- Severe storms
- Sewer backup
- Utility outages and impacts

- Straight-line winds/derecho
- Tornado
- Tsunami
- Terrorism
- Volcanic eruption

Concentration of Damage

The concentration of damage to communities is considered when evaluating requests for the FEMA IA program. High concentrations of damage may indicate a greater need for federal assistance in some areas. However, FEMA also recognizes that widespread damage throughout a large area may come with its own challenges that can also be difficult for a state, tribe, or territory to manage.

Disaster Impacted Population Profile

Disasters can disproportionately impact people with disabilities, people with limited English proficiency, people with lower income, people who are unemployed or homeless, people who live in extremely rural or urban areas, children, older adults, and others with access and functional needs. Part of the assessment should include an evaluation of the people in the impacted areas. This information may be helpful in identifying areas of increased need that require a more robust response from the state, tribal, or territorial government and the Federal Government. The following data points available from the U.S. Census Bureau and Tribal Government Census Bureau can be used by states, territories or tribal governments to help illustrate impact:

- The percentage of the population living under poverty thresholds;
- The percentage of the population already receiving government assistance, such as Supplemental Security Income and Supplemental Nutrition Assistance Program benefits;
- The pre-disaster unemployment rate;
- Disaster-related unemployment and impacts to major employers in the affected area;
- The percentage of the population that is 65 years and older;
- The percentage of the population that is 18 years and younger;
- The percentage of the population with a disability;
- The percentage of the population who speak a language other than English and speak English less than “very well”; and
- All unique considerations regarding American Indian and Alaskan Native tribal populations that may not be reflected in the U.S. Census Bureau data.

Impact to Critical Community Infrastructure

Disasters can have dramatic impact on infrastructure that supports normal community functions. State, tribal, or territorial governments and local jurisdictions are encouraged to outline how damage to infrastructure has impacted commerce, disrupted normal life in the community, and/or will complicate the recovery of individuals that depend on access. The following types of impacts to a community's infrastructure may adversely affect a population's ability to reside within the community and should be considered when preparing narrative impact statements included in the declaration request for federal assistance:

- Loss of roads or bridges that serve as the sole/primary transportation route in a community;
- Impact to water or sanitary treatment facilities;
- Impact to schools, government offices, and other important public infrastructure;
- Impact to public transportation, including busses, rail, and accessible transportation services; and
- Impact to supply of power and water to residential homes.

Transportation infrastructure or utility disruptions may render housing uninhabitable or inaccessible. Such conditions may affect the delivery of life-sustaining commodities, provision of emergency services, ability to shelter in place, and efforts to rebuild. The local, state, or tribal government may provide information regarding the impact on transportation infrastructure and utilities of a period greater than 72 hours. Examples include closed roads and bridges; impacts to public transportation, such as a bus system; and extended utility outages. To the extent known, information should be provided on the length of time for critical infrastructure and utilities to be restored.

Generally, trauma considered when evaluating requests for the FEMA IA program includes disruptions to normal community functions and extended power or utility outages. As trauma is discussed, preparers are encouraged to consider the ability of IA program components to address the need. These findings should be incorporated into the impact statement.

Community Lifelines

When drafting impact statements that look at the impacts of a disaster, states, tribes, or territories should evaluate how a disaster has disrupted FEMA's community lifelines:

- Safety and security
- Food, water, and shelter
- Health and medical
- Energy (power and fuel)
- Communications
- Transportation
- Hazardous materials

When a community lifeline is disrupted, impacts to the community will be significant and action must be taken to stabilize that lifeline.

For more information, refer to FEMA guidance on community lifelines:

<https://www.fema.gov/lifelines>.

Disaster-Related Deaths and Injuries

The number of individuals who are missing, injured, or deceased because of a disaster may indicate higher levels of trauma and underscore the need for supplemental federal disaster assistance, such as crisis counseling. State, tribal, or territorial governments are encouraged to capture and report disaster-related fatalities and injuries and include them in impact statements developed for the declaration request.

Emergency Sheltering Information

Information related to congregate and non-congregate care sheltering operations (i.e., shelter with family, dorms, ships, or tents) can help to estimate the number of people displaced from their homes and serve as a key gauge that can be used to illustrate the scale and magnitude of the disaster. Activity related to emergency sheltering should be included in the declaration request for assistance, especially in cases when shelters are required for more than 72 hours and when displaced residents are unable to return to their homes because of damage sustained in the disaster. Information that can be helpful in developing these statements includes the following:

- Location of each shelter,
- Daily overnight population for each shelter,
- Number of schools closed because a facility is being used as a shelter,
- Number of residents provided with hotel rooms as part of a sheltering program,
- Support provided by government and partners to assist with emergency sheltering,
- Assistance and services required to support people with access and functional needs in emergency shelters, and
- Location and population of shelters established to support household pets.

Feeding Operations Information

This information can be helpful in illustrating the scale and scope of the disaster, especially when government assistance is required or feeding operations are maintained for more than 72 hours. Information that can be used to describe activity and impact may include the following:

- Number and location of fixed feeding sites (by county),
- Number of vehicles providing mobile feeding,
- Jurisdictions being supported by mobile feeding,
- Number of meals served, and
- Partners involved in feeding operations.

Information Related to Distribution of Emergency Supplies

The quantity and type of assistance provided through distribution can be helpful in illustrating the scale and magnitude of the disaster. This is especially true following disasters like urban basement flooding where damage assessment may be difficult, when distribution is used to address critical life-saving/-sustaining needs (e.g., distribution of shelf-stable meals and water or health-related distribution), or when government assistance is necessary to support distribution of emergency supplies. Information that can be used to describe activity and impact may include the following:

- Distribution used to address a critical life-saving or -sustaining need,
- Durable medical equipment,
- General categories of items (e.g., cleanup kits, shelf-stable meals, medicine, etc.),
- Government assistance required,
- Jurisdictions served by distribution, and
- Trend line of the volumes of distributed items by type.

Individual Client Assistance (Client Casework) Information

State social service agencies and disaster service organizations like the American Red Cross will routinely open cases following a disaster to support the immediate needs of survivors. This information can be helpful in illustrating the disaster impact to survivors in a community and can be used to illustrate the overall scale and magnitude of the disaster. Information that can be used to describe activity and impact may include the following:

- Agency or organization providing assistance,
- Number of cases opened,
- Number of clients served in cases,
- Number of cases closed,
- Number of health services contacts,
- Number of mental health contacts,
- Types of assistance requested,
- Presence of resources to meet the needs of clients,
- Number of cases expected to be referred for substantive repair or rebuild assistance, and
- Number of cases with unmet needs.

Information Referral Services

Information referral services like 211 and 311 are frequently used by people dependent on the social service network and may serve as a key source of information related to the needs of the community. Increased call volume and the general type of services requested may also help to illustrate the scale and magnitude of the disaster and assist with

identifying areas of unmet need. Information that can be used to describe activity and impact may include the following:

- Number of calls received following the disaster, as compared to average steady-state call volume;
- ZIP Code where calls were received from;
- General types of assistance requested; and
- The presence or absence of a service provider to refer callers to for their categories of need.

Other Relevant Impact Data

When the factors addressed in 44 CFR or in the Tribal Declarations Pilot Guidance do not fully capture the impact of a disaster, the state, tribal, or territorial government requesting Stafford Act assistance may use other impact information that further describes the situation and the need for FEMA assistance. Information regularly used by states and tribal government includes the following:

- Evacuations – estimated duration,
- Lack of building materials,
- Contractor shortages,
- Extreme weather conditions and seasonal shifts that may impact recovery,
- The loss of low-cost or subsidized housing,
- Economic Impact created by displaced employees or damaged businesses,
- Disaster-related unemployment, and
- Cumulative effect of recent disasters.

Unique Conditions That Affect Tribal Governments

When a federally recognized tribe is requesting a Presidential disaster declaration, FEMA will consider whether there are needs or conditions that are unique to the tribal community, including but not limited to the following:

- Needs associated with remote locations (e.g., accessibility, food, water, and medical supply availability, etc.),
- Disaster's impact on the tribe's economy, and
- Cultural, historic, or spiritual considerations that may be protected under the American Indian Religious Freedom Act or the Indian Self-Determination and Education Assistance Act.

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CHAPTER 4: PUBLIC ASSISTANCE DAMAGE ASSESSMENTS

FEMA's PA program aids SLTT governments and certain types of PNP organizations so that communities can quickly respond to and recover from major disasters or emergencies declared by the President. Through the PA program, FEMA provides supplemental federal disaster grant assistance for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly owned facilities and specific facilities of certain PNP organizations. The PA program also encourages protection of these damaged facilities from future incidents by providing assistance for hazard mitigation measures. For detailed information related to PA program policies, refer to the [PAPPG](#).

Concept of Operations for PA PDAs

Initial Damage Assessment

The IDA is the basis on which all additional disaster assistance is provided. IDAs capture damage information and impacts and require an understanding of FEMA work categories and the ability to identify and document relevant disaster impacts. With information gathered during the IDA, states, territories, or tribes can establish a PDA plan of action and make an informed request to FEMA for a joint PDA.

Visually Confirming Damage

It is important to consider that all PDAs must include visual confirmation of IDA damage information for the damage to be considered valid.

When an incident occurs, the state, tribal, or territorial government organizes and coordinates the IDA process with local governments to ensure PA priorities and needs are effectively communicated and captured. The local or tribal government identifies damage and estimates the cost to impacted property and infrastructure in its jurisdiction and records all other information or data that might support the need for additional resources, such as the capacity of local resources to support response and recovery efforts. For more information on work eligible for PA, see Appendix J: Public Assistance Work Eligibility Matrix.

The process for IDAs is as follows:

1. State or territory starts reaching out to its local and tribal governments to initiate the IDA process.
2. Tribal governments start to determine if they want to participate in the state declaration request or request their own declaration.

3. Local and tribal government emergency managers activate their damage assessment teams.
4. Local and tribal government emergency managers evaluate 911 data or self-reporting data to determine impact areas to prioritize.
5. Local and tribal governments select and implement their assessment methodology and begin categorizing damage by severity, prioritizing larger damages with the most impacts.
6. Local and tribal governments synthesize and package the IDA data and highlight the biggest impacts.

Tribal Homeownership

Tribal homeownership can be more complicated than other forms of homeownership. In some cases, a tribal member's home is considered the property of the tribe. In this scenario, the home would be eligible for PA. A tribal government should attempt to identify who holds the title of and has legal responsibility for damaged homes prior to requesting a joint PDA. See Appendix D: Tribal-Specific Considerations for more information on tribal homeownership.

Local or Tribal Government Sends Data to State/Territory

Following the IDA, the local or tribal government sends its collected data to its state or territorial counterparts to continue the PDA process. If a tribe decides to request PA separately from its state, the tribe can submit its IDA data directly to FEMA to start the joint PDA process.

State, Territorial, or Tribal Government Collects Damage Information

The impact of disasters and the ability of state, tribal, or territorial governments to support recovery can vary greatly. For this reason, a variety of disaster-related information should be collected to lend substantive, data-driven content to requests for Stafford Act assistance. This information should illustrate overall impact and underscore how the unique resources of the Federal Government are necessary to support the community and its infrastructure. States, tribes, or

Technical Assistance

Prior to a joint PDA request, the state, tribal, or territorial government may request technical assistance from the appropriate FEMA region to support efforts to evaluate the information submitted by local jurisdictions and/or to analyze the need for a joint PDA.

Technical assistance may include support from the following:

- GIS analysts,
- CBRN coordinators,
- Program specialists, and
- Other SMEs necessary to advise state, tribal, or territorial emergency management officials and answer programmatic questions.

territories may determine IDA data supports the need to request a joint PDA from FEMA to support a Presidential disaster declaration request to access federal disaster assistance.

States and territories that receive IDA data from local or tribal governments and state agencies should implement a method for verifying as much IDA information as possible—starting with the hardest impacted areas and the most extensively damaged sites—before requesting a joint PDA from FEMA. This form of verification may include evaluation of basic PA eligibility requirements, reviewing and analyzing photographs of damaged buildings and infrastructure, reviewing contracting or force labor account documentation, or conducting in-person site assessments to ensure that local and tribal governments are accurately estimating costs. Verification of IDA information is designed to ensure accuracy, speed, and efficiency when joint PDAs take place with FEMA support.

Impact Statement: Narrative Examples

Impact statements should be written in a narrative format that describes the significance of an event for the community in concrete terms. For example:

- “The impact of [x] event is so severe that without assistance from the state or Federal Government, our jurisdiction will have to put off [x] capital improvement project(s) for [x] years.”
- “Due to [x] bridge/[x] street being compromised/destroyed, the postal carrier, school buses, and emergency response vehicles now have a 20-mile detour.”

State, Tribe, or Territory Requests Joint PDA with FEMA

Once information has been verified and the impacted jurisdictions are prepared, state, tribal, or territorial emergency managers should coordinate with their leadership. If the incident is of such severity and magnitude that resources needed to recover are expected to exceed state, tribal, or territorial government capability, the director of the state, tribal, or territorial emergency management agency may request a joint PDA. The joint PDA request is accomplished through a joint PDA request letter to the appropriate FEMA regional office, which should contain a list of disaster-impacted locations and a basic PDA schedule. FEMA does not impose specific requirements on how states, tribes, or territories conduct IDAs or verify information collected. However, when requesting a joint PDA, the state, tribe, or territory must provide the following information to the FEMA Regional Recovery Division for planning purposes:

- The type of damage to be surveyed, such as debris damage, emergency protective activities, and/or private and public facilities;
- Location and geographic spread of the damage, urban or rural area, type of terrain, and accessibility to the area;
- Magnitude and severity of damage and all estimates from the IDA;

- Immediate known problems, such as the following:
 - Areas inaccessible because of debris, high water, or damage to streets, roads, and bridges;
 - Serious health hazards;
 - Requirements for emergency protective measures;
 - Damage to critical infrastructure; and
 - Widespread loss of essential utilities and shortages of food, water, medical supplies, and facilities.
- Summary of recent state, tribal, or territorial disaster declarations, including incidents for which a Presidential disaster declaration was not granted (historical, geographical, demographic, etc.) that will be in the requested joint PDA; and
- Summary of activities taken by OFAs, if any, for coordination.

After the request but prior to conducting a joint PDA, FEMA will review for accuracy IDA information provided and verified by the state, tribe, or territory. This may include the cause of damage, impacted jurisdictions, location of damage, insurance coverage, and accuracy of the damage estimates completed by the state, tribe, or territory.

State, Tribe, or Territory Develops PDA Plan of Action

The state, tribal, or territorial government, with assistance or consultation from the region as requested, is responsible for developing a PDA plan of action for the joint PDA to ensure the efficient assessment of facility and infrastructure damage and other damaged sites. The PDA plan of action should include the following information:

- Methodology for validating damage and potential damage cost estimates (e.g., site assessments);
- A list of the most extensive damages and their locations;
- Schedule for visiting and assessing sites or interviewing potential applicants coordinated with local governments, prioritizing the most heavily impacted areas first; and
- A list of PDA team members and a list of team requirements (e.g., special considerations that may require additional support from FEMA).

FEMA programmatic representatives should coordinate with the state, tribal, or territorial emergency management agency to discuss the verified information submitted as part of the joint PDA request and develop an overall PDA coordination strategy.

The FEMA regional office will identify FEMA joint PDA leadership, deploy staff, and coordinate with OFAs (e.g., the U.S. Army Corps of Engineers [USACE]) needed to successfully complete the PDA. State, tribal, or territorial emergency management officials should identify joint PDA leadership, as well as staff that can serve on joint PDA field teams.

Damage assessment field teams should comprise at least one representative of FEMA and one representative of the state, tribal, or territorial government. A local government representative familiar with the extent and location of damage in the representative's community should be included, if possible. Other state, tribal, or territorial agencies, OFAs, and NGOs may also be asked to participate, as needed.

Joint PDA

Before PDA conduct begins, the state, tribe, or territory leads an initial briefing—with support from FEMA—with important information for the joint PDA team (e.g., disaster/impact specifics, team breakdowns, communications and reporting, safety, etc.). After state, tribal, or territorial emergency management officials have communicated the PDA plan of action to local or county emergency management officials, joint PDA operations begin. Teams that consist of the appropriate local, state, and federal staff and certain PNP organization officials execute joint PDAs in accordance with the state's PDA plan of action. These teams assess and validate IDA information to determine the extent of incident impacts and contribute to decisions on Presidential disaster declaration requests. Further, joint PDA teams collect information on the type and degree of damages and community impacts to support a request for a PA major disaster declaration. During the joint PDA, joint PDA teams complete the following steps:

Joint PDA Team Conducts Field Assessments

Local authorities help prioritize damage sites and locate previously recorded damages during the joint PDA. States, tribes, territories, and FEMA representatives are responsible for validating damages recorded during the IDA through visual confirmation and compiling site visit summaries and damage estimates. Joint PDA field teams are intended to validate—not find—damage and impact information already identified by SLTT government officials.

The amount of damage that requires validation from FEMA depends on each individual disaster at the local level and the state, tribal, and territorial level. In some cases, FEMA will only need to validate the most heavily impacted sites to know that the per capita indicator has been exceeded at the state and county levels or that the minimum damage amount has been exceeded. In other cases, where the disaster impacts may not be as great, FEMA may want to validate as much damage as possible to ensure the minimum damage amounts and/or the per capita indicators have been met. Even within the same disaster, counties that have seen different impacts will require different validation approaches that must be discussed by the joint PDA teams.

State, Tribal, and Territorial Governments and FEMA Compile and Share Data

FEMA and state, tribal, and territorial government staff should coordinate regularly during the joint PDA to discuss findings and reconcile all differences in order to reach a common understanding. While disagreements may exist, it is important that the rationale for decision

making be transparent. After the joint PDA teams have viewed all damage sites identified by the state, tribal, and territorial governments, FEMA will provide state, tribal, and territorial emergency management officials with a final summary of the joint PDA findings, including validated cost estimates. In accordance with the Privacy Act of 1974, FEMA may not share PII with state, tribal, and territorial government staff. FEMA recommends that state, tribal, and territorial government staff maintain their own copies of PDA information.

States, Tribes, Territories, and FEMA Assess and Validate Data

The PDA team will conduct an out-briefing to synthesize all PDA summaries and reach concurrence on damage estimates. States, tribes, territories, and FEMA validate data by assessing whether information is accurate, complete, and sufficiently detailed. The final PDA reports are submitted to state, tribal, or territorial leadership to inform their decision about whether to request a Presidential disaster declaration.

Final PDA reports do not constitute an official eligibility determination for PA. The state, tribe, or territory must submit additional documentation as part of a formal request for a Presidential disaster declaration. FEMA will review this documentation prior to making an official eligibility determination and providing federal assistance.

States, Territories, and Tribes Evaluate Need for a Declaration Request

The state, tribal, or territorial government reviews damage information validated through the joint PDA. Based on this information, the state, tribe, or territory decides whether to request a Presidential disaster declaration. The governor or tribal government executive makes the request to the President through the FEMA RA.

Request for Presidential Disaster Declaration

Impacted states, tribes, or territories that have decided to pursue a Presidential disaster declaration must submit a Request for Presidential Disaster Declaration (FEMA Form 010-0-13) to their FEMA regional program office within 30 days of the end of the incident period. Requests for deadline extensions must also be submitted within 30 days of the end of the incident period.

FEMA Region Submits Recommendation to FEMA HQ

When the FEMA regional program office receives a request for declaration from a state, tribe, or territory, they review the request and validated information developed during the joint PDA. The FEMA RA may request additional information from the state.

The FEMA RA submits a recommendation in the form of the RVAR to the Associate Administrator for the ORR at FEMA HQ on whether or not the state, tribe, or territory should receive a Presidential disaster declaration.

FEMA HQ Review

Program offices at FEMA HQ review the RVAR and make their own recommendations on whether or not the state, tribe, or territory should receive a Presidential disaster declaration and attach it to the RVAR for the FEMA Administrator's review. The FEMA Administrator then reviews the request package and attaches the FEMA Administrator's recommendation for submission to the President for a final decision. Refer to the [FEMA Declaration Process](#) for additional information on FEMA's Presidential disaster declaration process.

Declaration Request Extensions

The Associate Administrator for the ORR may extend the deadline if the governor or the tribal chief executive submits a written request and justification within the 30-day time period. FEMA may grant extensions when additional time is needed to conduct damage assessments if an impacted jurisdiction is as follows:

- Strained by multiple events,
- Conducting continued response efforts, or
- Unable to access impacted areas because of sustained incident conditions (e.g., high water and high winds).

PA Methodologies for Conducting Joint PDAs

Conducting joint PDAs requires SLTT governments and the Federal Government to balance speed and accuracy. The agreed-upon methodology should be flexible to account for all discrepancies between the scale and scope of damage and the availability of resources to conduct the joint PDA. Regardless of the methodology, FEMA must validate IDA damage estimates with visual confirmation. This section describes how FEMA will support the state, tribe, or territory in conducting joint PDAs.

PA Roles and Responsibilities

Roles and responsibility descriptions in this section are intended to give SLTT governments and the Federal Government emergency management officials the flexibility necessary to tailor the damage assessment process to resources, threats, populations, and stakeholders while maintaining standardization across the Nation.

While it is understood that not every jurisdiction will have the current resources or staff necessary to perform all the tasks outlined in this section, practitioners can use this information to develop a common understanding of damage assessment roles at each level. This uniformity will allow the development of common skills and understanding that underpin mutual aid networks and national uniformity.

Local or Tribal Government Roles and Responsibilities

As a best practice, some local jurisdictions have trained staff from non-emergency management offices to fill important positions. Examples include facilities personnel from public schools, local housing inspectors or code enforcers, local community planning and economic development officials, and offices responsible for maintaining publicly owned buildings or infrastructure.

These best practices are implemented at the local, tribal, and county level. Governments may have different position names; however, these roles and responsibilities, as described in Table 9, should be considered as local or county damage assessment teams are defined.

Table 9: Local or Tribal Roles and Responsibilities

Local and County Roles and Responsibilities	
Local or Tribal Damage Assessment Coordinator	• Generally performed by an emergency manager or designee. • Responsible for identifying and training local assessment team members, coordinating assessment activity in the jurisdiction, and submitting information to the county or state or tribal government, as appropriate.
Local or Tribal PA Damage Assessment Team Member	• Generally, representatives of potential applicants from government offices or private nonprofits (PNP). • Should be familiar with the Public Assistance (PA) categories of work and be able to collect information and supporting documentation during the damage assessment.

State, Tribal, or Territorial Government Roles and Responsibilities

State, tribal, or territorial governments can lessen the time required to verify damage by working with local emergency managers to assess whether the information submitted is complete and aligned with established FEMA programmatic eligibility standards and by providing technical expertise to local damage and impact assessment efforts. State, tribal, or territorial government damage assessment staff also play a pivotal role during the joint PDA, serving as state or tribal government representatives on both joint PDA leadership and field teams. Table 10 describes in greater detail the roles and responsibilities for state, tribal, and territorial governments as they relate to the damage assessment process.

Table 10: State, Tribal, or Territorial Government Team Member Roles and Responsibilities

State or Tribal Government Roles and Responsibilities	
State, Tribal, or Territorial Government Damage Assessment Coordinator	- Serves as the principal state, tribal, or territorial representative overseeing damage assessment, verification, and validation activities. - Responsible for ensuring that local damage assessments are appropriately supported, state, local, tribal, and territorial (SLTT) government staff are prepared to verify local assessment findings, coordinating with federal representatives during the joint preliminary damage assessment (PDA), and ensuring appropriate support is provided as requests for federal assistance are drafted.
State, Tribal, or Territorial Government PA Damage Assessment Team Lead	- Serves as the representative responsible for overseeing damage assessment activity related to the Public Assistance (PA) program. - This includes overseeing technical programmatic support provided during local or county assessment efforts, verifying PA-related information submitted by local or county emergency managers, and serving as the primary state or tribal programmatic representative during the joint PDA.
State, Tribal, or Territorial Government PA Damage Assessment Team Member	- Responsible for representing the state or tribal government as part of joint PDA field assessment team. - This team member may also be deployed to provide subject matter expertise or other technical support to impacted jurisdictions during local damage assessment and state or tribal government verification phases.

FEMA Roles and Responsibilities

The FEMA PDA coordinator is typically the regional PA branch chief or Deputy Regional Recovery Division Director. The FEMA PDA coordinator reports to the FEMA Regional Recovery Division Director. Programmatic team leads assigned to oversee PA program assessments report to the FEMA PDA coordinator and maintain appropriate coordination with the regional PA branch chief (as needed) to ensure programmatic considerations are considered throughout the joint PDA.

When a PA joint PDA is requested, the FEMA Regional Recovery Division Director or PA branch chief identifies a PA PDA team lead. PA PDA team leads are typically senior program specialists or specialists with considerable experience in conducting PDAs. The FEMA PDA team lead usually serves in this role in order to maintain consistency and accuracy. Typically, the more times the FEMA PDA team lead has served in that role, the more successful the PDA. When a joint PDA is requested by a federally recognized tribal government, close coordination with a FEMA regional tribal liaison will also be required to support culturally appropriate communication with tribal leaders and members. See Appendix D: Tribal-Specific Considerations for more information on the programmatic differences that might be highlighted during a PDA for tribal governments.

The roles and responsibilities outlined in Table 11 will clarify the reporting relationships and job responsibilities for FEMA staff as they relate to the damage assessment process.

Table 11: FEMA Damage Assessment Team Member Roles and Responsibilities

FEMA Damage Assessment Team Roles and Responsibilities	
FEMA PDA Coordinator	- Serves as a single point of contact for the FEMA recovery programs and ensures programmatic damage assessment leads are coordinated and supported with and by the regional office. - Assists hazard mitigation and environmental planning and historic preservation (EHP) leads in planning for team members and scheduling. - Designated by the programmatic branch chief or Recovery Director. May perform programmatic preliminary damage assessment (PDA) team functions simultaneously.
FEMA PA PDA Team Lead	- Serves as the programmatic representative responsible for overseeing all FEMA Public Assistance (PA) joint PDA actions in coordination with the FEMA PA PDA team lead's state or tribal counterpart (state or tribal PA PDA team lead) and ultimately for the efficient and accurate assessment of program-related damage throughout the affected areas. - PA PDA team leads serve as the field subject matter expert (SME) and answer complex eligibility questions that arise from site assessments. - Responsible for collecting, aggregating, and archiving joint PDA data from PA field team members, as well as formulating narratives and tables used to document validated damage.
FEMA PA PDA Team Member	- Facilitates the exchange of information with local officials, often through "memory jogs" or general discussion, to ensure an accurate and efficient collection of damage, work, cost, and program requirement information to validate, quantify, and document the cause, location, and details of estimated program costs. - Responsible for validating damage assessments, cost estimates, and ensuring programmatic requirements are met in the field.
FEMA Mitigation Point of Contact/Specialist	- Provides information related to the National Flood Insurance Program (NFIP), including information related to flood insurance policies and communities that are not currently participating in the program. - Responsible for identifying mitigation opportunities on a site-specific, community-, state-, or tribal-wide basis. - Responsible for collecting and compiling relevant mitigation data and information for inclusion in the hazard mitigation PDA narrative.
FEMA Environmental and Historic Preservation Specialist	- Ensures that environmental and historic preservation concerns identified during the joint PDA are understood and can be addressed at the appropriate level of government. - May help facilitate potential applicant communications with federal and state resource and regulatory agencies, as needed, to address real-time emergency recovery work in sensitive habitat areas and/or involving historic properties. - Identifies regulatory documentation requirements to consider during work.
FEMA External Affairs Specialist	- Serves as FEMA's representative to the media for matters related to the joint PDA. - When one or more tribes are involved in the joint PDA process, a FEMA regional tribal liaison may support culturally appropriate communications with tribal leaders and members, including coordinating with the tribe to develop and deliver cultural awareness training to FEMA staff.
Other Federal Agencies (OFA)	Provides information through coordination with the FEMA PDA coordinator or programmatic team lead to help develop efficient and effective damage and impact information.

FEMA Regional Office

The FEMA regional office provides oversight and direction to PA program branch chiefs and other staff throughout the joint PDA process. During the assessment process, FEMA regional office staff make determinations on eligibility for federal disaster assistance based on the validated PDA information submitted by state, tribal, and territorial governments. The responsibilities outlined in Table 12 clarify the role of FEMA regional office staff.

Table 12: FEMA Regional Office Team Member Roles and Responsibilities

FEMA Regional Office Roles and Responsibilities	
FEMA Regional Administrator	- Has direction, authority, and control over all FEMA regional functions and assets, including area offices authorized as a component of the regional office. - Responsible for receiving requests from the state or tribal government for Stafford Act Presidential disaster declarations, overseeing the development of analysis, and making a recommendation based on information provided in the regional administrators Validation and Recommendation (RVAR).
FEMA Regional Recovery Division Director	- Oversees the deployment of Regional Division staff required to support state or tribal government requests for joint preliminary damage assessments (PDA) and ensures necessary programmatic information is available during the development of the RVAR. - Responsible for providing direction and oversight for components of the Recovery Division, to include programmatic and technical assistance provided within the region in all phases of the damage assessment process.
FEMA Regional PA Branch Chiefs	- Provides direction and oversight of the Public Assistance (PA) program. - Responsible for overseeing the coordination of all actions required of their branch throughout the damage assessment process, including coordination with the state or tribal government program leads, mobilization of staff and assets, coordination with other federal agencies (OFA), and providing programmatic input for the RVAR.
FEMA Regional Environmental Officer	- Coordinates with FEMA mitigation specialists. - Responsible for overseeing site-specific damage locations that may require detailed environmental review in accordance with federal environmental laws.
FEMA Mitigation Division Director, Deputy Division Director, or Delegated Representative	- Manages and directs PDA activities for the Mitigation Division in the region. - Responsible for coordinating with regional recovery leadership to ensure joint PDAs are appropriately staffed with Mitigation Division points of contact and specialists. - Responsible for ensuring the Mitigation Division provides the appropriate level of programmatic input to the RVAR (e.g., by providing a hazard mitigation PDA narrative report).

Damage Assessment Methods

Joint PDA teams should choose a damage assessment methodology or methodologies based on information collection, verification, and validation requirements. Different types of incidents may require different approaches and timelines. When conducting assessments,

joint PDA teams should document the direct and indirect consequences that damaged and destroyed infrastructure has on the community.

Site Assessments

Joint PDAs for PA are typically done with in-person site assessments because PA damage assessments require a considerable amount of site-level information. The teams conducting site assessments should take photographs of damage to support restoration work and cost estimates. When local and tribal governments conduct thorough IDAs with photographs and supporting documentation, joint PDA teams may choose to validate smaller damages through desktop validation. Site assessment should still be conducted for large projects, prioritizing the largest, and for projects with the potential for environmental, historic, or cultural significance.

Respecting Tribal Privacy

FEMA will work closely with tribes to determine the best approach to damage assessments that respects the privacy of the tribe and the tribe's spiritual/cultural sites.

Site assessments may include in-person visits to the damaged facility and interviews with representatives from potential applicants who may have already completed the work (e.g., emergency protective measures or debris removal). When feasible, local and tribal government emergency management officials can work with the joint PDA team to arrange group meetings with potential applicants. In these meetings, FEMA, state, territorial, and tribal government officials can take the opportunity to explain in a group setting the federal disaster assistance process, the needs of the PDA, and the PA program categories of work. Once each category of work is explained, officials can ask if there is additional information that the local jurisdiction wishes to include. This is a forum for local emergency managers or potential applicants to describe the impacts they would face (e.g., financial impacts, community improvement delays, employee layoffs, or hiring delays) if a Presidential disaster declaration was not granted. When necessary, the joint PDA team can then call for individual interviews to obtain a better sense of each potential applicant's project, work, or damage impacts. A final PDA cost estimate cannot be reached for a potential applicant until the appropriate information/data and documentation is provided and program staff can validate the eligibility of the cost, work, facility, and applicant. FEMA must also verify OFA authorities and insurance coverage, including requirements to obtain and maintain insurance, in order to not duplicate benefits.

Desktop Assessments

Joint PDA teams must validate estimates with visual confirmation. Visual confirmation does not necessarily need to be in person in certain circumstances. When local or tribal government officials have the capabilities and capacity to conduct onsite IDAs—and can submit required information/data, documentation, and photographs demonstrating impact

and eligibility directly to FEMA—it may be possible for FEMA to validate potential projects remotely (desktop assessments).

Documents that are typically required for FEMA to validate projects (see Appendix K for additional details) may include the following:

- Annotated maps
- Photographs
- Debris quantity calculation sheets
- Brief statements of percentage of work completed at the time of assessment
- Brief statements about whether work is force account, contract, or a combination thereof
- Labor cost summary
- Labor contracts/agreements
- Equipment cost summary
- Supply cost summary
- Contractor bids or invoices

If a desktop assessment is agreed upon as a methodology, the concept of operations for joint PDAs will need to be adjusted:

1. FEMA PDA coordinator will work with the state, tribal, or territorial PDA coordinator in developing and agreeing on rules of engagement, how the PDA will proceed, ensure logistical requirements are met, and establish a date/time for the pre-deployment briefing, if necessary.
2. The state, tribal, or territorial PDA coordinator develops a PDA plan of action that identifies PDA team members; the local, tribal, or county assignments; and local or tribal government point of contact information and organizes logistical requirements.
3. State, tribe, or territory works with local staff to verify IDA data by conducting in-person site assessments.
4. State, tribal, or territorial PDA coordinator completes verification of PDAs before submitting to FEMA and submits verified projects in real-time to the FEMA PDA coordinator.
5. The FEMA PDA coordinator will review PDA information and assign to a PDA team member and other staff, as needed.
6. FEMA PDA team members review information submitted for eligibility and reasonable cost. Additionally, will notify other team members of potential issues in their area of support such as the Mitigation Branch, Environmental Planning and Historic Preservation (EHP), and External Affairs.
7. If validation questions arise, FEMA PDA staff communicate concerns to the PDA coordinator. The PDA coordinator contacts state, tribal, or territorial PDA coordinators to agree on a resolution to the questions. If a resolution cannot be reached, an onsite joint PDA may be required.

Impact Statements

Capturing the impact of damage in impact statements is an essential PA programmatic assessment requirement. Impact statements help illustrate whether the disaster is beyond the capacity of the impacted jurisdiction and if supplemental federal assistance is required to recover. Impact statements should include the following basic components:

- An outline of the incident (whether human-caused or natural, time of occurrence and location),
- A description of the impacted population,
- An explanation of losses and whether the losses have economic impact, and
- Numbers or statistics that lend context to the incident.

These statements, included in the governor's or tribal chief executive's request, are important because the impact of a disaster will be considered, regardless of whether a state, tribal, or territorial government meets the per capita cost indicators. FEMA does not use a per capita indicator when evaluating a tribal Presidential disaster declaration request. (For more information on the factors FEMA uses to review tribal Presidential disaster declaration requests for PA, see Appendix D: Tribal-Specific Considerations.) These statements are also important for giving context to potential damages that cannot be assessed at the time, like privately owned bridges and/or roads.

At times there are extraordinary concentrations of damage that might warrant federal assistance even though the statewide per capita indicator is not met. This often occurs where critical facilities are involved or when the cost of restoring damaged infrastructure in a localized area is extremely high. This is discussed in 44 CFR Part 206.48 (a)(2). Alternatively, federal assistance may not be warranted following disasters, even though the statewide indicator is met. This occurs when the state or tribal government has the ability to address the damage without supplemental federal assistance.

Refer to Appendix J: Public Assistance Work Eligibility Matrix for additional information on identifying PA damage.

Collecting Information for a PA Assessment

SLTT governments should capture and document as many damage sites as possible, regardless of whether they think the damage sites are eligible for federal disaster assistance. Regional PA leadership will review the validated PDA information submitted by the SLTT government in order to make an eligibility determination and recommendation for federal disaster assistance.

Estimated Cost of Assistance

States, territories, and tribes are responsible for estimating their cost of assistance by assessing damage and estimating project costs. To receive a Presidential disaster

declaration for PA, states and territories must have damage estimates that reach a statewide per capita indicator. Counties, tribes/tribal lands, and parishes must each have estimates that reach a county per capita indicator to be considered a designated area/entity for PA. [Per capita indicators are updated annually and can be found on the FEMA website.](#) Indicators are not a requirement but are a baseline to measure against. As stated in the impact statement section, localized impacts that are so severe but do not meet an indicator may still be considered. Federally recognized tribes that are requesting their own Presidential disaster declaration do not need to meet a per capita indicator. However, absent extraordinary circumstances, they do need to reach a minimum damage amount of \$250,000. For additional information about the factors FEMA uses to recommend approval for PA for tribes, see Appendix D: Tribal-Specific Considerations.

Identifying Potential Applicants

Identifying potential applicants is one of the first steps that SLTT governments must take to conduct damage assessments. Four types of applicants are eligible for PA:

1. State and territorial government agencies,
2. Tribal governments,
3. Local governments, and
4. Certain private nonprofit organizations, as defined in 44 CFR Part 206.221 (e).⁴

Program Eligibility Considerations

Four program eligibility factors are considered when developing PA program cost estimates:

- Cost
- Work
- Facility
- Potential applicant

Identifying Damaged Facilities

FEMA will consider disaster-related damage to all building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature that a potential applicant has legal responsibility to restore.

Documenting Damage

Once damage has been identified, potential applicants should document the work and estimate the actual cost required to perform emergency work or restore damaged infrastructure. To be considered for PA, work must be as follows:

- Required as a result of the disaster,

⁴ PDAs may be conducted only for certain PNP critical service providers, otherwise known as “critical PNPs,” that are eligible for federal disaster assistance. Critical PNPs include certain education, medical, utility, and emergency service providers. Administrative and support buildings essential to the operation of PNP critical service providers are eligible for federal disaster assistance. PNPs that provide non-critical services must first apply for a disaster loan from the SBA for permanent work and must pass an Office of Chief Counsel (OCC) eligibility review before becoming eligible to receive federal disaster assistance.

- Within a jurisdiction being assessed (except for sheltering and evacuation activities), and
- The legal responsibility of a potential applicant.

Potential applicants are encouraged to photograph damage. This may expedite damage assessment verification and help potential applicants to document pre-restoration damage should a disaster be declared. For the purpose of damage assessments, photographs only need to be submitted for one sample site, along with an indication of how many other sites that sample represents. It is not necessary to include photographs of all emergency protective measure work indicating how many other sites are representative of that particular site; however, photographs should be included to verify damage at sites where emergency construction is necessary (e.g., construction of an emergency roadway). Incorporating these photographs into diagrams or maps can further illustrate the location and extent of damage and expedite decision making. Refer to Appendix E: Technology for information on taking photographs.

Potential applicants should document damage dimensions, materials, and the size or capacity of damaged facility elements. This is particularly important for work to be completed because the information gathered is often critical to estimating and verifying work and cost required for restoration. Providing annotated maps and/or GPS tagged debris locations of damages in affected areas may also aid in the validation process and should be included, if possible. Refer to Appendix K: Public Assistance Work Assessment Matrices for additional information on documenting PA damage.

Documenting Work and Cost

In order to organize work-related information, FEMA divides each applicant's work into logical groupings. These groupings first separate activities into two primary work types: emergency work and permanent work. These work types are further divided into categories of work (A to G) defined by FEMA. This grouping structure is listed in Table 13.

Table 13: Types and Categories of Work

Type	Category of Work	
Emergency Work	A	Debris Removal
	B	Emergency Protective Measures
Permanent Work	C	Roads and Bridges
	D	Water Control Facilities
	E	Buildings and Equipment
	F	Utilities
	G	Parks, Recreation, and Other

Information describing work and cost should be broken down by category of work (category). If a potential applicant is unsure of the category, the work and cost required to restore the facility should still be documented so that a category can be assigned at the time of the joint PDA.

The work and cost associated with completed work can be summarized and supported, when necessary, with the documentation described in this section. Estimates will need to be developed for work yet to be completed. Note, for accuracy a member of a potential applicant's staff that is familiar with the damaged facility and regularly develops estimates for similar work or a qualified professional should develop estimates. Work and cost estimate calculations should be provided for all work to be completed to allow validation of estimates and ensure that it meets program eligibility requirements. When damage to a facility is complex or beyond the ability of a potential applicant to estimate, FEMA technical experts may be requested by a state, tribal, or territorial government to estimate the work and cost.

The following are common general methods used to accomplish disaster-related work and estimate cost. The information and documentation discussed are intended to assist potential applicants and emergency managers to prepare work and cost estimations and are applicable across all categories of work.

Labor (Force Account)

FEMA refers to a potential applicant's current staff as "force account." Force account labor claimed should be based on hourly rates plus the cost of fringe benefits. Overtime, premium pay, and compensatory time claimed by potential applicants should be consistent with pre-disaster written policies. Costs related to stand-by time will be considered when incurred in preparation for and directly related to actions necessary to save lives and protect public health and safety. Hours claimed for force account employees need to be reasonable and necessary.

FEMA's criteria for considering straight-time and overtime labor costs differ depending on the type of employee and whether that employee is performing emergency work or permanent work.

- *Emergency work* – Only overtime is considered for budgeted employees. For unbudgeted employees performing emergency work, both straight-time and overtime are considered.
- *Permanent work* – Both straight-time and overtime labor costs are considered for budgeted and unbudgeted employees.

For the purpose of damage assessments, potential applicants may choose to use average pay rates for groups of force account employees performing similar work, if calculating the actual cost for individual employees is time prohibitive. In either case, the rate claimed needs to be reasonable for the type of work performed.

Potential applicants claiming force account labor costs during damage assessments should document the number of employees performing a given task, type of employee (budgeted or unbudgeted), type of work being performed, regular time and overtime hours worked, and the hourly rate claimed in a summary. Timesheets, labor policies, and documentation to support wage rates are not typically necessary during damage assessments when the time and rates claimed are reasonable for the work.

Equipment (Force Account)

FEMA refers to equipment owned by a potential applicant as force account equipment. FEMA considers the cost of using force account equipment, including permanently mounted generators, based on hourly rates. Only time that the equipment was in use will be considered, unless it was used intermittently for more than half of the day.

Potential applicants may estimate the cost of force account equipment using FEMA equipment rates or tribal, state, or local equipment rates that meet criteria defined by FEMA. FEMA may also consider cost based on mileage rates for vehicles, if less costly than hourly rates.

Potential applicants submitting force account equipment costs during damage assessments should specifically document the type of equipment being used, type of work being performed, hours used/miles driven, and the equipment rate used in a summary. Activity logs and equipment rate documents are not typically necessary during damage assessments if the time and rates claimed are reasonable for the work.

Example of Force Account Labor and Equipment

Labor Force Account

- Five employees worked 125 overtime hours at \$45.00 per hour on average = \$5,625.

Equipment Force Account

- 15 cubic yard (yd³) dump truck for 125 hours at \$80.00 per hour = \$10,000.

Leased Equipment

When a potential applicant leases equipment, FEMA will generally consider costs submitted based on the terms of the lease.

Potential applicants that wish to claim leased equipment costs should specifically document the type of equipment that was leased, type of work being performed, and the cost of the leased equipment in a summary. Lease documents are not typically necessary during damage assessments as long as the cost claimed is reasonable for the equipment.

Supplies

FEMA will consider the cost of supplies, including materials, if the following apply:

- The supplies or materials are or will be purchased and are justifiably needed to effectively respond to and/or recover from the incident, or
- The supplies are or will be taken from the potential applicant's stock and used for the incident.

For the purpose of damage assessments, potential applicants should document all materials or supplies required for emergency work or permanent work in a summary. Minor supplies and materials may be listed as miscellaneous; however, significant expenditures should be specifically noted and include unit costs.

The cost of supplies and materials should be based on invoices, a potential applicant's established methods for pricing supplies and materials, historic prices for materials, cost estimates for materials pulled from stock (as well as what it would cost at that time to replace pulled stock), or prices from area vendors. Unless it is a large project, it is not typically necessary for potential applicants to provide invoices or other supporting documentation to support supply cost estimations during damage assessments.

Contract Service

FEMA will consider the cost of contract services based on the terms of the contract. While procurement methods and contract requirements are generally not reviewed during damage assessments, potential applicants should note that complying with procurement standards and contract requirements are a condition for receiving PA funding. PA PDA teams can also provide information to potential applicants on procurement disaster assistance team (PDAT) resources. Failure to adhere to these standards and requirements could jeopardize PA funding if a disaster is declared.

For the purpose of damage assessments, potential applicants should document all contract work and cost in a summary. The estimate, bid, or contract should also be made available as supporting documentation when the cost is above the large project threshold.

Mutual Aid Agreements

When a potential applicant requests resources from another jurisdiction through a mutual aid agreement, FEMA will consider costs incurred by the potential applicant. When a state has a statewide mutual aid agreement that designates the state as being responsible for reimbursing mutual aid costs, FEMA will consider costs incurred by the state. In either case, agreements and cost should be consistent with past practices for mutual aid.

For the purpose of damage assessments, potential applicants or states submitting mutual aid costs should provide labor, equipment, supply, and/or material costs and should document the location in which work was performed in a summary, as described previously.

Other PA program considerations can have a substantial impact on work and cost estimates. The information and documentation discussed next are intended to assist potential applicants and emergency managers to prepare work and cost estimates and are applicable across multiple permanent work categories (C to G).

Repairs vs. Replacement

If the cost of repairing a facility is estimated to exceed 50 percent of the replacement cost, an estimate based on the replacement of the facility may be considered. If a potential applicant would like a facility to be considered for replacement, the applicant should provide all information and documentation the applicant used to develop the applicant's estimates to state, tribal, and FEMA technical experts for review and validation. This practice does not apply to individual structural or mechanical components of a facility.

Landslides and Slope Stabilization

If a facility is located on a slope and is damaged as a result of a landslide or slope instability triggered by the incident, FEMA determines the stability of the slope that supports the facility before it considers costs required to restore the facility. Site inspections and limited geotechnical assessments to determine site stability and to obtain a technical opinion of the cause of the slope failure may be considered. The cost of restoring integral ground (ground necessary to physically support a facility) may be considered. Permanent work to stabilize natural ground that is not integral to an eligible facility's function is not considered. An example of eligible work includes a slope failure below a road which results in damage to the road itself or the shoulder. An ineligible example would be a slope failure above a road which results in debris removal but does not threaten the stability of the facility.

Costs Not Considered

Costs that are not eligible for PA funding will not be considered in the calculation of the estimated cost of assistance. There are also some costs that are PA eligible but are not considered for a PDA. Examples include, but are not limited to, the following:

- Costs ineligible for PA
 - Loss of useful service life of facilities,
 - Tax assessments,
 - Increased operating expenses (with limited exceptions for specific emergency health and safety tasks),
 - General surveys to assess damage, and
 - Cost of restoring facilities that were not in active use at the time of the disaster.
- Costs potentially eligible for PA but not considered for a PDA
 - Cost of administration or management,
 - Cost of engineering,
 - Cost to upgrade codes and standards, and
 - Cost of mitigation measures.

Insurance Coverage in Force

When conducting a PA damage assessment, FEMA takes into account whether or not a disaster-impacted facility has insurance coverage in force and what the insurance policy covers. Beyond what is covered through insurance, FEMA will consider the following information when assessing damage:

- Potential applicant's deductible
- Damage not covered under an existing policy or required by regulation
- Circumstances where eligible FEMA PA restoration costs exceed policy limits but do not include costs to upgrade codes and standards

For less costly damage, FEMA generally confirms insurance coverage and deductibles verbally with the potential applicant. For more extensive and/or costly damage—or if a potential applicant would like FEMA to consider costs other than a deductible for an insured facility—the applicant should provide the state or tribal government and FEMA with a copy of the applicant's insurance policy and other related documentation, such as the insurance adjuster's report. For further information on insurance requirements for PA project work, refer to the [PAPPG](#).

Special Flood Hazard Areas

For an NFIP-insurable facility located in an SFHA, FEMA will reduce estimated program costs when the facility is as follows:

- Located in an area that FEMA has identified as an SFHA for more than 1 year,
- Damaged by flooding, and
- Uninsured for flood loss.

If a potential applicant does not have flood insurance for the facility or carries inadequate flood insurance for the insurable facility, FEMA will reduce program costs by the lesser of the following:

- The maximum amount of insurance proceeds that could have been obtained from an NFIP standard flood insurance for the building and its contents, or
- The value of the building and its contents at the time of incident.

If an applicant's facility has a requirement to obtain and maintain insurance as a result of previously receiving PA in a previous disaster and the applicant has failed to obtain and maintain the required insurance, that facility is ineligible for assistance and FEMA will not consider the damage to that facility in the damage assessments.

Hazard Mitigation Projects

FEMA considers the extent to which in-place hazard mitigation projects undertaken by the state or tribal government and/or local governments contributed to the reduction of disaster damage for the disaster under consideration.

- If a state or tribal government can demonstrate in its disaster request that a statewide building code or other measure is likely to have reduced the cost of repairing damage, this will be considered in the evaluation of the request.
- Impact statements are important because the impact of a disaster will be considered, regardless of whether a state or territorial government meets the per capita cost indicators.
- Information should be provided to the FEMA damage assessment lead at the time of the joint PDA and included in the governor's or chief executive's request for federal assistance.

Next is the information states, tribes, and territories should consider, including in the mitigation section of their impact statement:

- Status of the state, tribal, or territorial FEMA-approved hazard mitigation plan;
- Status of communities under the NFIP;
Previous mitigation efforts that may have impacted the magnitude of the current disaster;
- Effectiveness of hazard mitigation planning (For example, was the risk and vulnerability from the current disaster documented in the plan?);
- Opportunities identified for future mitigation from the current disaster;
- Flood damage occurring outside the mapped special flood hazard areas (SFHAs); and
- Environmental and historic preservation concerns (e.g., work in water, tree clearance, or work outside the pre-disaster footprint).

Cumulative Effect of Recent Disasters

Recent disasters can have a dramatic impact on a state, tribal, or territorial government's ability to recover. For this reason, FEMA considers all disasters that have impacted a state, tribe, or territory within the last 12 months. This is discussed in 44 CFR Part 206.48 (a)(5).

FEMA considers Stafford Act Presidential disaster declarations, as well as state, tribal, or territorial declarations made by the governor or tribal chief executive and the extent to which the state, tribal, or territorial government has spent its own funds to support recovery.

State, tribal, or territorial governments are encouraged to include information related to prior disasters—including the localities designated in the state, tribal, or territorial declaration and specific expenses incurred by the state, tribal, or territorial government—in their request for federal assistance. While not required, additional information related to the ability of the state, tribal, or territorial government to provide support following the disaster being assessed (e.g., the status of state, tribal, or territorial government assistance programs) can be included in impact statements.

Other Federal Agency Programs

When it appears that a damaged facility may be within the authority of another federal agency, FEMA collaborates with the responsible federal agency for assistance with conducting a damage assessment. The responsible federal agency reviews the damage and advises FEMA on whether the work would be eligible under that agency's authority. If the work is eligible under that agency's authority, the costs for that work would be excluded from the PDA. In the same manner, the SLTT government should coordinate with the responsible agency for assistance with conducting a damage assessment.

Areas that may fall within the authority of another federal agency include PNP applicants, road restoration, flood control works and streams, federally maintained navigable waterways, removal of debris against bridges or along roadways located in watershed areas or in streams with 50 percent or more blockage, and hazardous material removal. If the disaster-related damage is within the authority of another federal agency, FEMA cannot consider the estimated costs, regardless of timing or funding availability of the other federal agency.

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APPENDIX A: LIST OF ACRONYMS

ALE	Additional Living Expenses
BIA	Bureau of Indian Affairs
CAP	Civil Air Patrol
CBRN	Chemical, Biological, Radiological, Nuclear
CERT	Community Emergency Response Team
CFR	Code of Federal Regulations
COAD	Community Organizations Active in Disaster
DDD	Damage Description and Dimensions
DHS	Department of Homeland Security
DI	Damage Inventory
EHP	Environmental Planning and Historic Preservation
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GIS	Geographic Information System
GPS	Global Positioning System
HAZUS	Hazards United States
HQ	Headquarters
HSPD	Homeland Security Presidential Directive
HVAC	Heating, Ventilating, and Air Conditioning
IA	Individual Assistance
IAPPG	Individual Assistance Program and Policy Guide
IDA	Initial Damage Assessment
IHP	Individuals and Households Program
IMSK	Incident Management and Support Keystone
LiDAR	Light Detection and Ranging
NDRF	National Disaster Recovery Framework
NIMS	National Incident Management System

NFIP	National Flood Insurance Program
NGO	Non-Governmental Organization
NRF	National Response Framework
OCC	Office of Chief Counsel
OCONUS	Outside Continental United States
OFA	Other Federal Agency
ONA	Other Needs Assistance
ORR	Office of Response and Recovery
PA	Public Assistance
PAPPG	Public Assistance Program and Policy Guide
PDA	Preliminary Damage Assessment
PDAT	Procurement Disaster Assistance Team
PII	Personally Identifiable Information
PNP	Private Nonprofit
POST	Prioritizing Operations Support Tool
PPD	Presidential Policy Directive
RA	Regional Administrator
RCCD	RRCC Recovery Coordinator
RRCC	Regional Response Coordination Center
RVAR	Regional Administrator's Validation and Recommendation
SAR	Synthetic Aperture Radar
SBA	Small Business Administration
SFHA	Special Flood Hazard Area
SLTT	State, Local, Tribal, and Territorial
SME	Subject Matter Expert
SOP	Standard Operating Procedure
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
USNG	United States National Grid
VAL	Voluntary Agency Liaison

VOAD	Voluntary Organizations Active in Disaster
WDR	Wind-Driven Rain

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APPENDIX B: GLOSSARY

Applicant – A non-federal entity that applies to be a subrecipient of assistance under a recipient’s federal award (e.g., local government agency, housing authority, or PNP organization).

Community Lifelines – The community lifeline construct is a model that documents the status of indispensable services that enable the continuous operation of essential business and government functions and is critical to human health and safety and/or national economic security. Community lifelines are a common lens which all responders can use to assess whether critical life-saving and life-sustaining services are disrupted and, if so, which core capabilities are required to provide and restore those services.

Damage Assessments and Information Collection – Common types of damage assessments and the appropriate methods for obtaining information for each type.

Emergency Declaration – An emergency declaration can be declared for an occasion or instance when the President determines federal assistance is needed. Emergency declarations supplement state and local efforts in providing emergency services, such as the protection of lives, property, public health, and safety or to lessen or avert the threat of a catastrophe in all parts of the United States. The total amount of assistance provided for a single emergency may not exceed \$5 million. If this amount is exceeded, the President must report to Congress.

Essential Living Space – An essential living space is a room within a home that serves the function of a bedroom, bathroom, kitchen, and/or living room that is regularly occupied or used by one or more members of the household and requires repair to bring its functionality back to the home (e.g., kitchens are considered essential as long as there is not another undamaged kitchen in the home).

Expedited Declaration Request – A state may request and FEMA may submit and recommend a Presidential disaster declaration request to the President prior to completion of a PDA when the magnitude of anticipated or actual impacts of an incident become unmanageable without national resources. Depending on the extent of damage and accessibility of impacted areas, FEMA may use alternative methods— such as fly-overs or windshield assessments led by a federal official—to validate damage and make the full range of federal assistance available. Refer to FEMA’s Presidential disaster declaration guidance for additional information on expedited declarations.

FEMA’s Information Requirements – Information and documentation commonly requested by FEMA during the joint PDA process in support of a request for a Presidential disaster declaration.

Flood Damage – Damaged caused by flooding.

Hazard Mitigation Grant Program – Assistance helps communities implement hazard mitigation measures following a major disaster declaration in the areas of the state, tribe, or territory to reduce the risk of loss of life and property from future disasters.

Individual Assistance – Provides federal awards to individuals and households, as well as SLTT governments, to support individual disaster survivors. Joint PDAs allow impacted governments to identify and assess disaster damages to determine whether jurisdictions will request an IA major disaster declaration.

Initial Damage Assessment – The effort by local authorities to collect data related to the extent of damage within a jurisdiction.

Joint Preliminary Damage Assessment – The coordinated effort by local, state, and federal authorities to validate damage data previously identified by state and local authorities to inform Presidential disaster declaration requests and federal disaster grant determinations.

Major Disaster Declaration – The President can declare a major disaster declaration for all natural events, including a hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought, or, regardless of cause, fire, flood, or explosion, that the President believes has caused damage of such severity that it is beyond the combined capabilities of state and local governments to respond. A major disaster declaration provides a wide range of federal assistance programs for individuals and public infrastructure, including funds for both emergency and permanent work.

Non-Flood Damage – Damaged caused by a disaster outside of a flood, such as an earthquake, tornado, or wildfire.

Preliminary Damage Assessment – A mechanism used to determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and communities as a whole. There are two types of PDAs: IDAs and joint PDAs.

Public Assistance – Provides federal assistance to support communities' recovery from major disasters by providing them with grant assistance for debris removal, life-saving emergency protective measures, and restoring public infrastructure. Joint PDAs are conducted to identify disaster-related damage and determine whether jurisdictions are eligible for PA.

Recipient – A non-federal entity that receives an award from a federal agency (e.g., state, tribal, or territorial government) to carry out an activity under a federal program.

Roles and Responsibilities – Roles, responsibilities, and the concept of operations related to the damage assessment framework and standards for teams supporting the joint PDA process.

Subrecipient – An applicant that receives a sub-award from a recipient to carry out part of a federal program.

Technical Assistance – Prior to a joint PDA request, the state, tribal, or territorial government may request technical assistance from the appropriate FEMA region to support efforts to evaluate the information submitted by local jurisdictions and/or to analyze the need for a joint PDA.

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APPENDIX C: AUTHORITIES AND FOUNDATIONAL DOCUMENTS

Robert T. Stafford Disaster Relief and Emergency Assistance Act. Public Law 93-288, as amended, 42 U.S.C. §§ 5121 et seq.

The Stafford Act, signed into law on November 23, 1988, amended the Disaster Relief Act of 1974 (Public Law 93-288). The Stafford Act constitutes the statutory authority by which the Federal Government provides disaster and emergency assistance to state, territorial, and local governments; tribal nations; eligible PNP organizations; and individuals affected by a declared major disaster or emergency. The Stafford Act covers all hazards, including natural disasters and terrorist events. The Stafford Act is the primary law governing all new recipient requests for federal assistance.

Title 44 of the Code of Federal Regulations (CFR), Emergency Management and Assistance.

The CFR is a codification of the general and permanent rules and regulations published in the FEDERAL REGISTER that contain basic policies and procedures. Title 44 is titled, “Emergency Management and Assistance,” and Chapter 1 of Title 44 contains the regulations issued by FEMA, including those related to implementing the Stafford Act.

Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et seq.).

The Homeland Security Act of 2002 created the Department of Homeland Security (DHS) as an executive department of the Federal Government. The Homeland Security Act consolidated component agencies, including FEMA, into DHS. The Secretary of Homeland Security is the head of DHS and has direction, authority, and control over it. All functions of all officers, employees, and organizational units of DHS are vested in the Secretary of Homeland Security.

Presidential Policy Directive 8 (PPD-8), National Preparedness, March 30, 2011.

PPD-8 is aimed at strengthening the security and resilience of the United States through systematic preparation for the threats that pose the greatest risk to the security of the Nation, including acts of terrorism, cyber-attacks, pandemics, and catastrophic natural disasters. PPD-8 mandates the National Preparedness System and the National Preparedness Goal.

Homeland Security Presidential Directive 5 (HSPD-5), Directive on Management of Domestic Incidents, February 28, 2003.

HSPD-5 enhances the ability of the United States to manage domestic incidents by directing the establishment of a single, comprehensive NIMS. In addition, the HSPD-5 combines the investigative and responsive elements of federal agencies (called “crisis management and consequence management”) into a single approach. The NIMS is designed to cover the prevention of, preparation for, response to, and recovery from terrorist attacks, major disasters, and other emergencies.

National Response Framework (NRF), October 2019.

The NRF provides foundational emergency management doctrine for how the Nation responds to all types of incidents. The NRF is built on scalable, flexible, and adaptable concepts identified in the NIMS to align key roles and responsibilities across the Nation. Since publication of the third edition of the NRF in 2016, disaster response operations have underscored the paramount importance of sustaining essential community lifelines. The NRF defines community lifelines as those services that enable the continuous operation of critical government and business functions and are essential to human health and safety or economic security.

National Incident Management System (NIMS), October 2017.

The NIMS is a set of principles that provides a systematic, proactive template for managing incidents and guiding government agencies at all levels, NGOs, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents—regardless of cause, size, location, or complexity—in order to reduce the loss of life or property and harm the environment.

National Disaster Recovery Framework (NDRF), June 2016.

The NDRF is a guide that enables effective recovery support to disaster-impacted states, tribes, territories, and local jurisdictions. The NDRF provides a flexible structure that enables disaster recovery managers to operate in a unified and collaborative manner; it focuses on how best to restore, redevelop and revitalize the health, social, economic, natural, and environmental fabric of the community and build a more resilient nation.

National Mitigation Framework, June 2016.

The *National Mitigation Framework* describes the benefits of being prepared by understanding risks and what actions can help address those risks. The intended audience for this document is individuals, families, communities, the private and nonprofit sectors, faith-based organizations, and federal, state, local, tribal, territorial, and insular area governments. The second edition of the *National Mitigation Framework* focuses on a culture of preparedness which is centered on risk and resilience. The document provides context for how the whole community works together and how mitigation efforts relate to all other parts of national preparedness.

FEMA Publication 1, November 2019.

Publication 1 serves as FEMA's capstone doctrine. It helps FEMA employees understand their role in the emergency management community and provides direction proper conduct and decision making. The intent of Publication 1 is to promote innovation, flexibility, and performance in achieving FEMA's mission. It promotes unity of purpose, guides professional judgment, and enables FEMA employees to fulfill FEMA's responsibilities.

Use of the United States National Grid (USNG), FEMA Directive 092-5.

FEMA Directive 092-5 establishes the USNG as FEMA's standard geographic system across all preparedness, mitigation, response, and recovery activities, as well as land- or air-based operations. FEMA Directive 092-5 also provides instruction for implementation and encourages use of the USNG among whole community partners.

Incident Management and Support Keystone (IMSK), January 2011.

The IMSK is the primary document from which all other FEMA disaster response directives and policies are derived. The IMSK describes how the response doctrine, articulated in the NRF, is implemented in FEMA disaster response operations.

Individual Assistance Program and Policy Guide (IAPPG), FP 104-009-03 (March 2019).

The IAPPG combines all IA policy into a single volume and provides an overview of the IA program implementation process with links to other publications and documents that provide additional process details, requirements, and deadlines outlined in Chapter 7: New Recipient Checklist.

Public Assistance Program and Policy Guide (PAPPG), FP 104-009-2 (April 2018).

The PAPPG combines all PA policy into a single volume and provides an overview of the PA program implementation process with links to other publications and documents that provide additional process details, requirements, and deadlines outlined in Chapter 7: New Recipient Checklist.

Individual Assistance Declarations Factors Final Guidance, June 2019.

Individual Assistance Declarations Factors Final Guidance provides additional information regarding the way FEMA will evaluate a request for IA using the factors at 44 CFR 206.48(b). This guidance is intended to aid states and territories in drafting requests for major disaster declarations authorizing IA. It is also intended to provide additional clarity regarding the circumstances, the severity, and magnitude (relative to state capacity) under which FEMA is likely to recommend or not recommend a Presidential disaster declaration authorizing IA. This guidance also describes FEMA's process for evaluating requests for major disaster declarations authorizing IA and for formulating its recommendation to the President.

Sandy Recovery Improvement Act, January 2013.

The *Sandy Recovery Improvement Act* represents the most significant legislative change to the Federal Emergency Management Agency's (FEMA) substantive authorities since the enactment of the *Robert T. Stafford Disaster Relief and Emergency Assistance Act*. The law authorizes several significant changes to the way FEMA may deliver federal disaster assistance to survivors.

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APPENDIX D: TRIBAL-SPECIFIC CONSIDERATIONS

The Sandy Recovery Improvement Act amended the Stafford Act in 2013 to give federally recognized Indian tribal governments, hereafter referred to as tribes or tribal governments, the authority to request an emergency or major disaster declaration directly from the President. As a result of this authority, tribal governments now have several options for seeking disaster assistance from the Federal Emergency Management Agency (FEMA) through its Individual Assistance (IA) and Public Assistance (PA) programs. These options provide tribal governments important opportunities for flexibility and self-determination.

FEMA Assistance Options for Federally Recognized Tribes

- (1) Recipient with its own declaration.
- (2) Subrecipient under a state declaration.
- (3) Recipient under a state declaration.
- (4) Combination of the previous three options without duplicating program services.

A recipient is a non-federal entity that receives a federal award directly from a federal awarding agency.

In addition to unique cultural, geographic, and legal considerations, tribes must also carefully consider how they wish to seek assistance from FEMA. All these decisions affect the preliminary damage assessment (PDA) process.

Purpose of This Appendix

The purpose of this appendix is to highlight areas of the PDA process that are unique for tribes and particularly for tribes that are requesting their own major disaster declaration directly from the President.

Using This Appendix

The primary audience for this appendix is federally recognized tribes. Additionally, this appendix can be used as a reference for state and Federal Government officials collaborating or coordinating with tribes during the PDA process. Information from the main text of the PDA Guide may be repeated here, and that is intentional; this appendix is designed to establish a broader context for tribes to understand how and where decisions fall in the PDA process.

What Are Preliminary Damage Assessments?

A PDA is the term for an assessment conducted to identify damage after a disaster. The two major types of PDAs include initial damage assessments (IDA) and joint preliminary damage

assessments (joint PDA). Each type of PDA can be conducted as either an IA PDA or a PA PDA.

Initial Damage Assessment: IDAs are conducted by the tribe immediately following a disaster to verify and document impacts to the tribal community and to evaluate the tribe's capacity to respond and the need for additional assistance. IDAs should help answer the following questions:

- Are the tribe's resources overwhelmed?
- Where is the damage, and what areas have the greatest needs?
- What are the tribe's unmet needs?

Tribes should conduct IDAs before they request joint PDAs from FEMA. IDAs are important because they do the following:

- Help identify damage that needs to be validated by FEMA and the tribe through the joint PDA process;
- Help identify resource gaps and where additional assistance is required;
- Inform the strategy for joint PDAs with FEMA; and
- Provide time to identify who has legal responsibility for damage.

At all points in the IDA process, tribal governments can request technical assistance from their respective FEMA regional office to support the damage assessment process (even before making a formal request for a joint PDA to FEMA).

Joint Preliminary Damage Assessments: Joint PDAs are conducted collaboratively between FEMA and the tribe (and sometimes states) to review and validate disaster-related damages and expenses identified in the tribe's IDA. IDAs are:

- Critical for informing a Presidential disaster declaration request; and
- Must be requested by the tribal chief executive to the appropriate FEMA regional administrator (RA).

Tribal governments submit requests for technical assistance, joint PDAs, and Presidential disaster declarations to the FEMA regional office in which the tribal government seat is located, but assistance can be provided across FEMA regions. Tribal governments that want to be considered part of a state's joint PDA or Presidential disaster declaration request should work with the RA and office in the region in which the requesting state is located.

IA PDAs

FEMA IA programs deliver supplemental assistance to disaster survivors for unmet needs caused by a Stafford Act incident. Support may include assistance for temporary housing and housing repairs, critical disaster-related expenses, the replacement of essential personal property, and funding to the tribal government for IA program services. Refer to the [Individual Assistance Program and Policy Guide](#) and [Tribal Declarations Pilot Guidance](#) for more information on IA programs and eligibility.



Tribal governments can facilitate the IA PDA process by being prepared to define their “tribal community” with support from FEMA. Generally, when a tribe receives a direct declaration for IA, eligibility for the IA program is limited to the enrolled members of the tribe (i.e., at least one member of the tribe must reside in the home). At the request of the tribe, FEMA may expand eligibility for an event to non-enrolled individuals who are members of the “tribal community,” such as adopted children, widows, widowers, and descendants. Tribes are encouraged to identify these individuals before an event occurs.

PA PDAs

The FEMA PA program provides emergency assistance to save lives and protect property and assists with permanently restoring community infrastructure. PA is divided into two types of work:



Emergency work

- Category A: Debris Removal
- Category B: Emergency Protective Measures

Permanent work

- Category C: Roads and Bridges
- Category D: Water Control Facilities
- Category E: Public Buildings
- Category F: Public Utilities
- Category G: Parks, Recreational, and Other Facilities

Refer to the [Public Assistance Program and Policy Guide](#) and [Tribal Declarations Pilot Guidance](#) for more information on PA programs and eligibility.

Tribal governments can facilitate the PA PDA process by establishing which federal agencies have legal responsibility for permanent or emergency work for which buildings and

[FEMA Preliminary Damage Assessment Guide](#)

infrastructure, as shown in Table 14. This will streamline the PDA process and help the tribe and FEMA determine what damage is eligible for FEMA assistance.

Table 14: Other Federal Agencies that Provide Federal Assistance to Tribes

Damaged Infrastructure	OFA Authority for Tribes
Federal Highway	Federal Highway Administration (FHWA)
Public Roads on Tribal Trust Land	Bureau of Indian Affairs (BIA) and/or FHWA
Stream/Watershed	Environmental Protection Agency (EPA)
Waterways	U.S. Department of Agriculture, Natural Resources Conservation Service, United States Army Corps of Engineers (USACE), and BIA
Health Service Facilities	Indian Health Service
Utilities	EPA
Schools	Bureau of Indian Education
Parks, Recreation	National Park Service and BIA

PDA Process

For most incidents affecting tribes, the decision to request FEMA assistance directly from the President cannot be made until PDAs have taken place in coordination and collaboration with FEMA and the state(s). The state may reach out to a tribe to initiate damage assessments, or, in some cases, the tribe may reach out to the state to see what other impacts the state has incurred. The information gathered during PDAs is an important element of a tribal government's Presidential disaster declaration request.

Tribe Completes IDA

When an incident occurs, the tribe conducts an IDA to verify and validate damage to the tribal community. IDAs help the tribe understand the scope and scale of disaster-related damage and expenses and the tribe's resource capacity to respond. The tribe also records all other information or data that might demonstrate the need for additional resources. Before the incident occurs, tribal governments can prepare for IDAs by identifying assessment team members, detailing roles and responsibilities, and by exercising the desired methodology as a team.

Defining Tribal Community

To support the validation of tribal membership throughout the PDA process, tribes are encouraged to collect information on enrolled tribal members and other members of the tribal community. Tribes should provide FEMA with the following:

- ☐ List of enrolled tribal members,
- ☐ List of homes owned by enrolled tribal members (addresses, if available), and
- ☐ If applicable, additional categories of individuals (e.g., adopted children, widows, widowers, descendants, etc.).



Individual Assistance IDA

When a disaster has impacted a significant number of tribal members and their homes, tribes may start to consider whether they should conduct IA IDAs. An IA IDA occurs when the tribe assesses the damage to individual homes. There are a variety of methods that tribes can use to assess damage to homes in their community, described in Table 15. Individual tribal governments must decide which methods work best for their operational, cultural, and privacy needs. A common methodology for conducting IA IDAs is a combination of self-reporting, windshield surveys, and door-to-door assessments.

Table 15: IA Damage Assessment Methods

Method	Description
Self-Reporting	Self-reporting is the process by which individual members of the tribal community report disaster damages to the tribal government or tribal emergency manager. This process contains several steps: 1. Tribe creates or identifies an appropriate method for the public to report damage (e.g., phone line and email address). 2. Tribe sends out a public message requesting survivors with disaster-related impacts report those impacts. 3. Tribe collects this information in damage assessment reports. 4. Tribe sends out teams to validate information in each report.
Windshield Survey	Windshield surveys are an efficient way to assess damage to individual homes from a vehicle and can be used to verify reports from the field. Assessment teams record observed damage while driving through impacted areas, periodically stopping to conduct interviews with survivors to verify damage, insurance coverage, or ownership status.
Door-to-Door Assessment	Door-to-door assessments happen when tribal officials physically go to each home, meet and interview owners or renters, and document actual damage. This process is much more time intensive, but it adds a lot more accuracy, which is very valuable for later steps in the process.
Geospatial Analysis	Geospatial analysis uses existing and post-event satellite or fly-over imagery and data to assess damage and is typically used to expedite damage assessments when more traditional methods will be too time-intensive. The Geographic Information System (GIS) can be used throughout the process to describe damage, perform analysis, and illustrate impact.
Modeling	Modeling (or predictive modeling) can be used in a variety of ways to estimate probable damage. These products are produced by a number of universities, private sector firms, and federal agencies.

When a tribe requests a Presidential disaster declaration to include the IA program, disaster-related impacts to homes and personal property are the principal factors FEMA and the President use to determine if the request should be approved. However, these are not the only factors. The impact of disasters and the ability of tribal governments to support recovery can vary greatly. For this reason, a variety of disaster-related information should be collected to support requests for Stafford Act assistance. This information should illustrate

overall impact and underscore how the unique resources of the Federal Government are necessary to support disaster survivors.

Factors^e that FEMA uses to determine disaster impacts and eligibility for IA include the following:

- Underinsured homes/personal property losses;
- Availability of housing resources;
- Casualties;
- Impact on community infrastructure;
- Impact on populations with greater needs:
 - Tribal elders, tribal members with medical conditions, and a group of tribal members identified as having additional needs based on their socioeconomic condition, physical remoteness, and access to what would be considered routine support and services;
- Extent of voluntary agency assistance and assistance being made available by state and local governments;
- Tribal government resources available for response and recovery;
- Unique conditions that affect tribal governments (e.g., remoteness, economy, and cultural considerations); and
- Other relevant information.

FEMA has identified critical information that should be collected and validated when assessing damage to individual homes. This information corresponds with the previous IA declaration factors:

- Cause of damage;
- Concentration of damage;
- Homeownership rate of impacted homes:
 - Because damage to tribal homes could fall under IA or PA depending on the owner and who has legal responsibility for the dwelling, tribes should include a tribal housing authority representative in the IDA process to accurately capture home ownership;
- Insurance coverage rates;
- Number of homes destroyed and number with major, minor, and affected damage amounts;
- Inaccessible areas;
- Special flood hazard areas;
- Primary versus secondary residences; and

^e Refer to the Tribal Declarations Pilot Guidance for additional information on these factors.

- Other relevant information like income levels, poverty, trauma, etc.

Proof of ownership is not required until survivors register for IA. (It is not required during the PDA process.) However, for some types of IA housing and other needs assistance (ONA) survivors must own the home. Proof of ownership includes the following:

- Title/deed/official record
- Mortgage statement
- Real property insurance bill
- Written self-declarative statement if all other documentation is unavailable

Residential housing may fall under PA in some scenarios, such as the following:

- Home has a U.S. Department of Housing and Urban Development-/U.S. Department of Agriculture-financed mortgage loan not fully paid off by the borrower/occupant (Title not conveyed to borrower and held by the tribe)
- Home owned by the tribal housing authority

Knowing how ownership verification works during the damage assessment process will help inform which program will be responsible for which damages. Tribal housing authority representatives are important resources that can provide insight into which home titles are held by individuals and which home titles are held by the tribe. Table 16 contains information on identifying ownership and legal responsibility for tribal housing. Refer to the [IAPPG](#) and [PAPPG](#) for additional information on eligibility for IA and PA, respectively.

Table 16: Tribal Housing and Eligibility for FEMA Assistance

Arrangement/ Ownership	Responsibilities	Individual Assistance Eligibility	Public Assistance Eligibility
Individual owns house, but not the land.	The land may be owned by the tribe or held in trust by the Bureau of Indian Affairs (BIA) and either the land cannot be deeded or it cannot be a traditional deed of trust.	House and personal property.	Land (if owned by the tribe).
Tribal housing authority owns the house.	A tribal housing authority is responsible for maintenance and repair of the homes they build until individuals make the final payment and receive full conveyance.	Personal property only.	Authority that owns building may be eligible (e.g., housing department).
BIA owns the house.	BIA funds housing on reservations and repairs, and maintenance of the housing is the responsibility of BIA.	Personal property only.	Land (if owned by the tribe).
Individual is a conventional homeowner.	Conventional fee simple homeowner paid outright or with a mortgage for the homeowner's home.	House and personal property.	N/A.

Arrangement/ Ownership	Responsibilities	Individual Assistance Eligibility	Public Assistance Eligibility
Individual inherited home.	Home was inherited, but the title may be lost. Without a title, the owner needs to provide a statement declaring ownership and explain why proof of ownership is lost.	House and personal property.	Land (if owned by the tribe).
Individual rents on tribal land.	Renter pays a fee or lives rent-free in dwelling.	Personal property only.	Land (if owned by the tribe).
Fractionated ownership.	Fifty-one percent of landowners must agree to a new land use agreement. In some cases, there are thousands of landowners because of generations of inheritance.	Depends on the lease agreement.	Land (if owned by the tribe).
Individual is a conventional homeowner and not a member of the tribe.	Non-member homeowners who live on or near tribal land (e.g., checkerboarded land) may be potentially eligible for assistance depending on how the tribe defines “tribal community.” Tribes may determine that non-members who provide critical services to the tribe are eligible for Individual Assistance (IA).	Depends on how the tribe defines “tribal community” under IA.	Land (if owned by the tribe).

Figure 3 can be used as a quick reference for evaluating and categorizing damage to individual homes, including flood damage, for conventionally built homes and manufactured homes. For more information, refer to Chapter 3: Individual Assistance Damage Assessments.

Conventionally Built Homes	Manufactured Homes
▪ Affected Damage: Residences with minimal cosmetic damage to the exterior and/or interior (e.g., flood waters in unfinished basement). ▪ Minor Damage: Residences sustaining non-structural damage that may affect habitability (e.g., flood waters up to 18 inches in essential living space) ▪ Major Damage: Residences sustaining structural damage requiring extensive repairs (e.g., flood waters above 18 inches in essential living space) ▪ Destroyed: Residences are total losses or damage is to such an extent that repair is not feasible (e.g., failure of two or more structural components)	▪ Affected Damage: Residences with minimal cosmetic damage only. (e.g., flood waters below the floor system damaging skirting) ▪ Minor Damage: Residences with non-structural damage that may affect habitability (e.g. flood waters are in the floor system) ▪ Major Damage: Residences sustaining structural damage requiring extensive repairs (e.g., flood waters cover the floor system and enter the living space) ▪ Destroyed: The residence is a total loss (e.g., frame is bent or twisted or flood waters reach the roofline)

Figure 3: Damage Levels and Criteria for Homes



Public Assistance IDA

When a disaster impacts the public infrastructure of a tribal community and/or requires a significant amount of emergency protective measures to save lives and protect property, tribal governments may consider conducting PA IDAs. At the outset of a disaster, emergency managers may not know exactly which damage and work would be eligible for FEMA's PA program. Tribes should document all work related to disaster response and recovery and all damage to their community infrastructure. FEMA will work with the tribe during the joint PDA to determine what may be potentially eligible for PA.

While IDA teams are not expected to know whether damage will ultimately be eligible for the PA program, teams can remember the basic building blocks of eligibility to better understand what to look for when documenting damage and work. The four basic components of PA eligibility are (1) cost, (2) work, (3) facility, and (4) applicant:

- Cost must be adequately documented, authorized, necessary, and reasonable. (Eligible costs include labor, equipment, materials, and contract work).
- Work must be required as a result of the declared incident and the legal responsibility of the tribe.
- Facility must be a building, public works, system, equipment, or natural feature.
- Applicant must be a tribal government entity or certain types of private nonprofit (PNP) organizations that operate facilities that provide eligible services and are organized or doing business under tribal law.

A common methodology for PA IDAs is to conduct a combination of site assessments and interviews with potential applicants. Review Table 17 for more details.

Table 17: PA Methodologies

Method	Description
Site Assessments to View Actual Damage	• Tribal damage assessment teams can work with the tribal emergency manager and other tribal government agencies to identify damage areas and the legally responsible organization or agency. Emergency responder logs can also be a good source of identifying damage sites. • Damage assessment teams should conduct in-person visits to damaged areas to collect data and photographs, prioritizing the most significant damage first.
Interviews of Potential Applicants	• Damage assessment teams interview representatives from organizations or agencies that have experienced impacts because of the disaster. Sometimes interviews will result in in-person site assessments where teams evaluate damage; other times, the interview is the assessment (i.e., work was already completed). • Damage assessment teams should encourage the interviewees to bring as much documentation of the event and damage as possible, to include photographs (if applicable), insurance coverage, contracts, estimates, and force labor account records.

According to the [Tribal Declarations Pilot Guidance](#), “absent extraordinary circumstances, FEMA will consider a declaration request from a tribal government [for Public Assistance] only if it is determined that the tribal government sustained at least \$250,000 in PA-eligible estimated damage or cost.” This is known as the “cost of assistance.” While the cost of assistance is a principal factor in the declaration process, there are many other factors that FEMA and President take into consideration when evaluating a tribe’s request for the PA program. The impact of disasters and the ability of tribal governments to support recovery can vary greatly. For this reason, a variety of disaster-related information should be collected to support requests for Stafford Act assistance. This information should illustrate overall impact and underscore how the unique resources of the Federal Government are necessary to support disaster survivors.

Factors^f that FEMA will ultimately use to determine disaster impacts and a tribe's eligibility for PA, include the following:

- Estimated cost of assistance (minimum damage amount of \$250,000),
- Insurance coverage in force,
- Programs available from other federal agencies to address the tribe's needs,
- Evaluation of previous mitigation efforts,
- Recent multiple disasters of the last 24 months, including but not limited to previous FEMA declarations,
- Types and amounts of damage,
- Economic impact of the damage to the tribal community and government,
- Tribal resources available for response and recovery,
- Demographics of the impacted community,
- Impact on community infrastructure,
- Unique conditions that affect tribal governments (e.g., remoteness, economy, and cultural considerations), and
- Other relevant information.

Tribe Coordinates with State and Local Emergency Officials

Throughout the IDA, tribes and representatives from state and local governments should collaborate and coordinate as closely as possible. In many cases, when a tribe is impacted by a disaster, surrounding or overlapping jurisdictions have also been affected. Regular coordination and collaboration among government representatives help establish which government entity is responsible for which damage or work. When possible, tribes and overlapping local jurisdictions should share their assessment results and make sure all the damage/work has been captured and none of the damage/work has been recorded twice.

Before a tribe officially requests joint PDAs from FEMA, it should coordinate with the state to help the state and tribe understand what impacts they have sustained from the disaster and whether they might benefit in some way by conducting joint PDAs together or even collaborating on a Presidential disaster declaration request.

For some very large tribes or tribes with multiple, separate reservations, the central tribal government may have coordinated IDAs with multiple localized teams throughout its tribal land areas. In these cases, it is important for the tribe to verify IDA information before requesting a joint PDA with FEMA. During a joint PDA, FEMA does not identify damage; it validates damage that has already been identified and verified by the tribe. If a tribe intends to request FEMA assistance as a subrecipient or recipient under a state's declaration, the

^f Refer to the Tribal Declarations Pilot Guidance for additional information on these factors.

tribe must contribute to the state's overall IDA by sending its collected data to the state for verification.

Tribe Requests Joint PDA with FEMA

Prior to requesting a joint PDA, FEMA will review for accuracy IDA information provided and verified by the tribe or state. This review includes verification of the cause of damage, impacted jurisdictions, location of damage, and insurance coverage. Additionally, at this stage in the process, tribes should be considering whether they want to include state or local government representatives in their joint PDA.

If the damage is of such severity and magnitude that resources needed to recover are expected to exceed the tribal government's capabilities, the tribal chief executive through the tribal chief executive's designated representative may request a joint PDA from the appropriate FEMA RA. These requests are written and informed by IDA data. For the information that is needed in the official joint PDA request, see page 45 of the PDA Guide. Tribes have 30 days from the end of the incident period to either request a declaration or submit a request for an extension. The [Tribal Declarations Pilot Guidance](#) has instructions on how to request a Presidential disaster declaration.

Joint PDAs and Working with the State(s)

States that have their own joint PDAs may ask a tribe to participate. In this case, a tribe who chooses to participate in a state-FEMA joint PDA does not necessarily need to request separate joint PDAs excluding the state to request its own major disaster declaration. As long as tribes have participated in a joint-PDA in which their damages were ultimately validated by FEMA (regardless if the state was involved or not), the tribe will be able to request its own disaster declaration.

Tribe Develops PDA Plan of Action

The tribe is responsible for developing a PDA plan of action. The PDA plan of action should include the following elements (Table 18):

Table 18: PDA Plan of Action Elements

Preliminary Damage Assessment (PDA) Plan of Action Elements	
Individual Assistance Elements	Public Assistance Elements
 • Suggested organization and composition of the joint PDA teams (e.g., tribal team leads, tribal historic preservation officer, tribal housing authority official, state/local government officials if appropriate, etc.). • A list of damaged homes and their corresponding degrees of damage (i.e., destroyed, major, minor, or affected). • A list of homes that are inaccessible. • A methodology for validating the degree of damage of disaster-impacted homes (e.g., door-to-door assessments and windshield surveys, etc.). • A schedule for visiting and assessing damaged homes or neighborhoods, prioritizing the most heavily impacted areas and homes first.	 • Suggested organization and composition of the joint PDA teams (e.g., tribal team leads, tribal historic preservation officer, tribal roads subject matter expert, state/local government officials, if appropriate, etc.). • A list of damaged facilities and infrastructure and their corresponding estimates. • A list of disaster-related emergency work (e.g., emergency protective measures or debris removal). • A methodology of validating damage to facilities and infrastructure and validating disaster-related work expenses (e.g., site assessments and interviews). • A schedule for visiting damage sites and for conducting interviews with potential Public Assistance (PA) applicants, prioritizing the largest most costly projects first.

In preparation for conducting a joint PDA with FEMA and/or the state, tribal governments should work with FEMA to ensure the cultural awareness training FEMA provides to its staff is accurate and appropriate. The tribal government should also identify tribal representatives who can escort FEMA staff to damage sites and who are knowledgeable regarding the legal responsibility, ownership, and insurance coverage for disaster-impacted infrastructure and housing within the tribal community.

FEMA-Tribe Joint PDA

Once a joint PDA is requested, FEMA and the tribe collaborate closely to ensure damages are assessed in a timely and efficient manner and to discuss findings and reconcile all differences. While disagreements may exist, it is important that the rationale for decision making be transparent.

Teams comprised of the appropriate tribal and federal staff (and potentially state and local staff, if they have been included) execute joint PDAs in accordance with the tribe's PDA plan of action. PDA field teams should comprise at least one representative of the tribal government and one representative of FEMA. Other tribal representatives, agencies, and NGOs may also be asked to participate, as needed.

During the joint PDA, the tribe and FEMA representatives are responsible for validating damages recorded during the IDA through visual confirmation and compiling site visit summaries and damage estimates. The PDA team will conduct an out-briefing to synthesize all PDA summaries and reach concurrence on damage estimates.

At the close of the joint PDA, FEMA will provide the tribal government or tribal chief executive with a final summary of its findings to assist the tribe's decision about whether to request a disaster declaration. Table 19 provides a high-level example chronology for conducting PDAs.

Table 19: Joint PDA Chronology Example

Joint PDA Chronology Example		
Pre-Arrival Scheduling	Before FEMA staff arrive, the tribal preliminary damage assessment (PDA) coordinator will establish a schedule for the joint PDA by first prioritizing the most heavily impacted areas and sites.	
	Individual Assistance (IA) Scheduling  When conducting door-to-door assessments, the tribal PDA coordinator should set up appointments, when possible, with homeowners so that FEMA staff can assess each home individually and meet with the survivor(s).	Public Assistance (PA) Scheduling  The tribal PDA coordinator will set up appointments with representatives of organizations or agencies that have experienced disaster impacts to discuss damage. Those appointments can be individual interviews, group interviews (multiple representatives at once), or meetings on site with the damaged facility.
FEMA Arrival	FEMA PDA team members will arrive at a central location near the disaster-impacted area, and the FEMA PDA coordinator will contact the tribal PDA coordinator. The FEMA PDA coordinator will assign FEMA team members to individual joint PDA teams as designated in the tribe's PDA plan of action.	
Meeting	Typically, in the morning before the first assessments, FEMA and the tribe will meet in person at a central location or all together on a conference call. In this forum, tribal government officials can provide an overview of the damage they have verified, review the tribal PDA plan of action, ask questions of FEMA, and ensure each team knows its roles, responsibilities, schedules, and geographic areas.	
Cultural Awareness Training	FEMA regional tribal liaisons may have already provided a brief training to FEMA staff on cultural awareness when working with tribal governments as sovereign nations. When necessary, tribal representatives can supplement that training for FEMA staff with additional information that is specific to the unique history and culture of the tribe. (For example, are there lands or facilities that are off limits to FEMA staff because of the cultural, spiritual nature of the area?)	

Joint PDA Chronology Example

	IA Assessments 	PA Assessments 
Assessments	Whether door-to-door assessments or windshield surveys, Individual Assistance PDAs often require a lot of driving from one location, neighborhood, or township to the next. When possible, teams should ride together in one car to reduce the footprint of the joint PDA and to have time alone as a team to discuss the degree of damage of each home. Teams should never discuss the damage level of a home in front of a survivor or the media.	For each site assessment, interview, or group interview, the tribal team lead will introduce and facilitate the discussion with the potential applicant and the FEMA team lead will provide a brief overview of the FEMA PA program and the types of documents FEMA needs to validate damage and work. While at damage sites, joint PDA team members will take photographs as records of the damage.
Coordination	Throughout the process, the tribal and FEMA PDA coordinators maintain communication and openly and transparently discuss damage estimates and eligibility considerations. Both work together closely to agree on estimate amounts, and both continue to be a resource to their respective team members in the field on all difficult questions of legal responsibility, authority, or FEMA program eligibility.	
Conclusion	Most assessments take multiple days. When a large majority of the damage has been assessed and validated by FEMA or if the damage is so overwhelming a majority is not required to meet the minimum damage amount, the joint PDA will end. The PDA team will conduct an out-briefing to synthesize all PDA summaries and reach concurrence on damage estimates. FEMA will provide the tribal government or tribal chief executive with a final summary of its findings to assist the tribe's decision about whether to request a disaster declaration.	

Request for Presidential Disaster Declaration

The tribal chief executive should make the tribal chief executive's request to the President through the appropriate FEMA RA. When a FEMA RA receives a request for declaration, the FEMA RA reviews the request and validated information developed during the joint PDA. The FEMA RA submits the FEMA RA's recommendation in the regional administrator's validation and recommendation (RVAR) to the FEMA Administrator at FEMA HQ. Tribes have 30 days from the end of the incident period to request a Presidential disaster declaration or to submit a request for an extension. The [Tribal Declarations Pilot Guidance](#) has instructions on how to request a Presidential disaster declaration.

Evaluate Other Options

If a tribe evaluates damage with FEMA and determines that there is not enough damage and enough strain on the resources of the tribe to warrant a Presidential disaster declaration request, the tribe should evaluate other recovery options. These include being a subrecipient underneath the concurrent state declaration (if applicable), reaching out to other federal agencies that may have legal responsibility over certain damaged infrastructure, or reaching out to various non-governmental organizations that specialize in emergency response and recovery.

If a tribal government decides that it does not want to request a Presidential disaster declaration, information developed during the joint PDA may be used to request assistance from other federal agencies (e.g., U.S. Small Business Administration [SBA]) or to determine the need for state government recovery programs.

Overarching Considerations

Disaster grant program delivery is generally the same for tribes as it is for all recipients; however, there are some overarching differences that should be clarified before PDAs begin:

- Tribal recipients cannot have non-tribal subrecipients.
- Insurance considerations may be unique for some tribes.
- Cultural or spiritual sites and items may be eligible and should be identified.

Tribes as a Pass-through Entity

Recipients are non-federal entities that receive an award from a federal agency (e.g., tribal government). Some recipients are considered "pass-through entities" if they pass the federal award to a subrecipient. Tribes cannot be pass-through entities for non-tribal subrecipients. When a tribe receives a direct declaration, the only entities that can be subrecipients to the tribe are tribal organizations (e.g., tribal housing authority) or private nonprofit organizations organized or doing business under tribal law. Disaster-related damage or work that is the legal responsibility of a non-tribal local government or non-

governmental organization should not be included in a tribe's PDA; this type of work would be the responsibility of the state.

Tribal Insurance Coverage

Tribes often have unique insurance coverages. PDA teams should work with the tribal housing authority to see how homes are covered for insurance. In some cases, insurance on a tribally owned enterprise (e.g., a casino) also includes broader coverage terms that extend to the entire tribe and can be applied to many tribally owned buildings (including homes). Tribes should provide PDA teams a general understanding of how insurance coverage may relate to an incident, but FEMA will not ask for copies of insurance documents at the time of joint PDA.

Cultural Sites and Items

Cultural and traditional sites and items may be eligible for assistance under the PA program or the IA program, depending on who owns them and how they are maintained. In some cases, unimproved spiritual/cultural sites could be eligible under federal disaster grants. PDA teams may need the expertise of tribal cultural or historic preservation officers or experts to determine if damage has occurred to cultural sites. Damage to cultural sites and items should be reflected in the tribe's impact statement.

FEMA typically uses a standardized list of personal property items to determine which disaster-damaged items may be eligible for IA ONA. For individual cultural items to be eligible for IA reimbursement, the tribe must submit an ONA Administrative Option Selection Form and add its cultural, spiritual, or traditional line items to the standard personal property line item list. All recipients must submit their form to FEMA annually by November 30th, regardless of the option selected. Following a major disaster declaration in which IA is an approved program, all updates to the form must be completed by the recipient within 72 hours of authorization of IA. All items added to the list are subject to the 25 percent non-federal cost share.

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APPENDIX E: TECHNOLOGY

Various technologies can be used to improve the timeliness, accuracy, transparency, and comprehensiveness of damage assessment. This section reviews several technologies that are already used by the emergency management community. SLTT government partners are encouraged to explore and leverage additional technologies they may have access to.

Remote Sensing

Remotely sensed data, such as aerial imagery, provides eyes on the ground without physical presence. Imagery collected through remote sensing can be used to identify damaged homes and infrastructure and determine the extent of damage. The following list summarizes common data types and the aircraft or other systems needed to collect that data. A geospatial or remote-sensing specialist should determine and request the most appropriate data for the event:

- High resolution orthorectified satellite imagery (20-inch or 0.41-meter pixel resolution, if possible).
- High resolution orthorectified airborne imagery (10-inch pixel resolution or better).
 - This imagery should be acquired at an overhead/nadir angle. For best results, 6-inch oblique imagery should be acquired.
- Synthetic aperture radar (SAR) or light detection and ranging (LiDAR) sensors: used for mapping flooding extents and change detection on land.
- Civil Air Patrol (CAP) photographs: Geo-tagged photographs collected through mission assignment that are most often simple airborne collected images that are not orthorectified and can also include ground-collected photographs.
- Traditional media: Photographs or news footage can be geo-located in order to determine locations of damaged houses.
- Social media: Geo-tagged photographs or videos posted to social media sites, such as Facebook, Twitter, Instagram, etc.

Limitations that can affect timeliness and quality of remotely sensed data include the following:

- Weather
- Flight prohibition
- Poor data environments
- Contract acquisition timeline
- Impacted area

Mobile Surveys

Mobile damage assessment applications can increase the accuracy of information collected by serving as job aids that walk the assessor through the information required to evaluate damage. This standardized information intake approach, combined with the ability to attach photographs to each assessment conducted, allows for immediate verification and feedback. Together, these elements increase the quality of information developed in the field and enable emergency managers to further leverage the use of non-emergency management staff to conduct assessments and increase capability.

FEMA has developed mobile surveys for conducting PDAs. FEMA has also made templates for these surveys that are maintained by the FEMA PDA Program Office. These templates are publicly available resources that SLTT government officials can use to create their own versions of a mobile survey platform. Templates can be accessed at <https://www.fema.gov/pda>.

Geographic Information Systems

GIS allow an analyst to view, manipulate, and extract information from geospatial data. GIS provide the following capabilities to the emergency management community:

- View location-based data collected by field staff,
- View imagery or remotely sensed data,
- Develop and run models to predict disaster impact, and
- Identify options for routing, resource allocation, temporary housing, and other decisions.

A geospatial analyst may also use GIS to conduct geospatial statistical analyses and derive findings from correlating different data types. For damage assessments, GIS can provide a high-level view of damaged structure.

Remote Validation

In certain circumstances, FEMA may use photographs and other data collected by SLTT governments to validate damage remotely. Remote validation can be utilized to supplement site assessments in situations when damage is inaccessible, when the work has already been completed, or when damage can be validated easily through photography. Additionally, remote validation may be a principal method when FEMA and SLTT governments choose to conduct desktop assessments—assessments with little to no onsite validation. (See page 55 in the PDA Guide for more details on desktop assessments).

Photographs can communicate a wealth of contextual information for staff involved in the PDA process. FEMA best practices on taking photographs, listed next, may be used by SLTT

governments with the capability and capacity to take and submit photographs of damage directly to FEMA:

- Take several wide-view photographs of the entire facility from multiple angles. For example, photograph road damage from both ends of the road.
- Take wide-view photographs of each component, capturing the entire component.
- Take close-up photographs of each damaged component to show details.
- For all photographs, include an item to indicate size, such as a traffic cone, tape measure, or pen.
- For all photographs, capture distinctive stationary features to indicate position, such as flags, signs, cones, desks, or trees. When taking multiple photographs, ensure reference items help a reader “stitch together” the scene.
- When taking photographs inside structures, take photographs in a panoramic style. Stand in one place and turn in a circle while taking photographs. Turn a few degrees after taking each photograph and ensure the edges of photographs overlap.
- Ensure lighting and perspective allow a viewer to clearly see damages.
- Include GPS coordinates and perspective (e.g., east and west) on each photograph.
- Photograph all damage indicated by the applicant, even if the damage may not be eligible for FEMA disaster assistance. Take photographs and closeups of everything that raises a concern.

When leveraging technology to document damage, special consideration must be given to issues of privacy and information security related to data collection. To leverage technology responsibly, it is necessary to consider the following:

- PII.
- Data storage and whether data is accessible to all parties who can use it (local, state, and federal) could consider using ArcGIS Online or another platform.
- Data accuracy.
- Timing of data collection.
- Contract requirements for open access and/or restrictions or cyber security concerns.

For additional guidance on FEMA’s standards for privacy and information security related to data sharing, refer to the [DHS Handbook for Safeguarding Sensitive PII](#).

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APPENDIX F: PUBLIC ASSISTANCE INFORMATION AND DOCUMENTATION CHECKLIST FOR DISASTER DAMAGE DESCRIPTION AND DIMENSIONS

This information must be entered into grants portal for each facility on the damage inventory (DI). Damage description and dimensions (DDD) must clearly separate the dimensions and description of the facility from those of the intended repairs. Dimensions and descriptions of completed work must also be reported separately. DDDs must contain the following information:

Facility Description for Every Site – This information is used to understand what the original facility looked like.

- ☐ Facility type
- ☐ Facility name
- ☐ Facility description (purpose and use)
- ☐ Address/location
- ☐ GPS coordinates (include start and end for facilities or damage longer than 200 ft)
- ☐ Year built
- ☐ Dimensions: type, measure, and units
- ☐ (e.g., width 10 ft x length 40 ft x depth 5 ft)
- ☐ Capacity/volume/quantity/number and units (e.g., two lanes, 500 yd³, 6,000 ft²)
- ☐ Materials
- ☐ Make/model/type

Facility Damage Description – Confirm damages were caused by the incident and occurred during the incident period.

- ☐ Start and end dates of incident period
- ☐ Date damaged
- ☐ Description of the cause of damage

Component Description and Damage – Include for each damaged component to explain what the damage looked like.

- ☐ Component type (e.g., wall and pavement)
- ☐ Component location
- ☐ Dimension, material, and capacity of the original component
- ☐ Dimensions of the damage
- ☐ Make/model/type
- ☐ Capacity/volume/quantity/number/units

Documentation

- ☐ Sketch of facility and damage
- ☐ Photographs of whole area
- ☐ Photographs of damage from many (three plus) angles
- ☐ Closeup photographs of each component
- ☐ Photographs of all rot, crumbling, cracks, or other wear.
- ☐ Firmette

- ☐ Map of the facility with damage annotated
- ☐ Map or Google Earth screenshots of the surrounding area with the facility and damage annotated

Method of Repair – Applicant’s method of repair for each DI item.

- ☐ Who performed/will perform the work?
- ☐ Change of material from original design?
- ☐ Change in size/footprint?
- ☐ Other work/repair comments – If planning to change the design, size, or capacity, please provide plans and explain why.
- ☐ Are there EHP issues associated with the proposed scope of work? Explain.

APPENDIX G: PDA FORMS

PDA Narrative Report

PDA NARRATIVE REPORT					
City	County	State	Date	Page	Local Government Official/Contact No.
1. Event type (i.e., flood, wind-driven rain, and tornado) and description of damage trends observed (i.e., water contamination).					
2. Identify issues related to sewer backup (i.e., insurance, damage to sewer lines, and normal sewer backup).					
3. Identify areas with utilities out; include projected date of restoration.					
4. Identify areas of concentrated damages.					
5. Identify remote areas.			6. Identify major inaccessible areas and reasons (i.e., mudslide, landslide, and roads out).		
7. Describe types of structures surveyed (i.e., brick, wood frame, foundation, basements, etc.).					
8. Describe prevalence of damage to manufactured homes or mobile home parks.					
9. Number of businesses impacted.			10. Names of major employers impacted (i.e., description and number of employees).		
11. Other factors that impact tax base (i.e., vacation and tourism properties damaged, permanent exodus of population from disaster area, loss of use of commercial areas, and loss of production base).			12. Describe agricultural impact, if applicable (i.e., loss of crops and livestock).		
13. Are there currently shelters open?					

14. Estimated number of displaced households and where they are staying.
15. Are there sufficient housing and rental resources to meet the needs of the displaced? If no, where are the nearest available resources?
16. Describe local and VOAD activities and agency resources available.
17. Is there a significant need for counseling services?
18. Describe impact on special populations (i.e., access and functional needs, people with language barriers, and seniors and children).
19. List tribal nations impacted.
20. List storm-related fatalities and injuries (provide total numbers and names, if possible).
21. All other factors affecting the area not previously listed (i.e., evacuations, manufactured homes moved, schools as shelters, secondary homes, and concern of local contact).

IA Street Sheet Example

[illegible]

PA Site Sheet Example

FEDERAL EMERGENCY MANAGEMENT AGENCY PRELIMINARY DAMAGE ASSESSMENT SITE ESTIMATE				SHEET 1 OF SHEETS	
				DATE	
PART I - APPLICANT INFORMATION					
COUNTY	NAME OF APPLICANT	NAME OF LOCAL CONTACT	PHONE NO.		
PART II - SITE INFORMATION					
KEY FOR DAMAGE CATEGORY (Use appropriate letters in the "category" blocks below)					
a. DEBRIS REMOVAL		d. WATER CONTROL FACILITIES		g. FACILITIES UNDER CONSTRUCTION	
b. PROTECTIVE MEASURES		e. PUBLIC BUILDINGS		h. PRIVATE NON-PROFIT	
c. ROADS AND BRIDGES		f. PUBLIC FACILITIES		i. PUBLIC RECREATION	
SITE NO.	CATEGORY	LOCATION (Use map location, address, etc.)			
DESCRIPTION OF DAMAGE					
IMPACT:				% COMPLETE	COST ESTIMATE
SITE NO.	CATEGORY	LOCATION (Use map location, address, etc.)			
DESCRIPTION OF DAMAGE					
IMPACT:				% COMPLETE	COST ESTIMATE
SITE NO.	CATEGORY	LOCATION (Use map location, address, etc.)			
DESCRIPTION OF DAMAGE					
IMPACT:				% COMPLETE	COST ESTIMATE
SITE NO.	CATEGORY	LOCATION (Use map location, address, etc.)			
DESCRIPTION OF DAMAGE					
IMPACT:				% COMPLETE	COST ESTIMATE
NAME OF INSPECTOR		AGENCY		PHONE NO.	
				OFFICE	HOME

FEMA Form 90-81, JAN 84 (M/S Excel)

APPENDIX H: INDIVIDUAL ASSISTANCE DAMAGE MATRICES

Tables 20 and 21 provide the damage assessment matrices for manufactured and conventionally built homes, respectively.

Manufactured Homes

Table 20: Damage Assessment Matrix for Manufactured Homes

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Affected	The residence has cosmetic damage only.	Below Floor System	- No damage affecting habitability; cosmetic damage only (e.g., skirting is impacted). - Residences with damage to a porch, carport, garage, and/or an outbuilding, etc.	- No damage affecting habitability; cosmetic damage only (e.g., skirting is impacted). - Residences with damage to a porch, carport, garage, and/or an outbuilding, etc.
Minor	The residence is damaged and requires minimal repairs to make habitable.	In Floor System	- When the waterline has reached the floor system but has not entered the living space of the unit. Examples of damage include the following: - Bottom board, insulation, or ductwork in the floor system. - Heating, ventilating, and air conditioning (HVAC) is impacted. - There is no structural damage to the residence, and it has not been displaced from the foundation.	- There is no structural damage to the residence, and it has not been displaced from the foundation. - Some of the nonstructural components have sustained damage (e.g., windows, doors, wall coverings, roof, bottom board insulation, ductwork, and/or utility hookup). - HVAC is impacted.
Major	The residence has sustained significant damage and requires extensive repairs.	In Living Space	- Water has covered the floor system and entered the living space of the unit but is still below the roofline. - The residence has been displaced from the foundation, block, or piers, and other structural components have been damaged.	- The residence has been displaced from the foundation, block, or piers, and other structural components have been damaged. - Fifty percent or more of non-structural components (e.g., roof shingles, drywall, and utility hookups) have sustained significant damage.

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Destroyed	The residence is a total loss.	Above Roofline	The residence is a total loss, for example: • Waterline is at the roofline or higher. • Residence's frame is bent, twisted, or otherwise compromised.	• The residence's frame is bent, twisted, or otherwise compromised. • The majority of the structural framing of the roof or walls has been compromised, exposing the interior.
Inaccessible	Damage to residence cannot be visually verified.	N/A	• Flood waters are blocking access to residences by covering, washing out, or destroying roads, bridges, or access routes, and degree of damage cannot be visually verified.	• Debris from landslides, mudslides, severe soil erosion, or blowdown is blocking access to residences by disrupting or destroying roads, bridges, or access routes, and degree of damage cannot be visually verified.

Conventionally Built Homes

Table 21: Damage Assessment Matrix for Conventionally Built Homes

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Affected	The residence has minimal cosmetic damage to the exterior and/or interior.	In Unfinished Basement	- Waterline in the crawl space or an unfinished basement when essential living spaces or mechanical components are not damaged or submerged. - Damage to a porch, carport, garage, and/or an outbuilding, etc.	- Cosmetic damage, such as paint discoloration or loose siding. - Minimal missing shingles or siding. - Damage to an attached structure (e.g., porch, carport, garage, or outbuilding, etc.), gutters, screens, landscaping, retaining walls, or downed trees that do not affect access to the residence.
Minor	The residence has sustained a wide range of damage that does not affect structural integrity but could affect habitability.	Below 18 Inches	- Waterline at 1 to 3 inches in an essential living space. - When waterline exceeds 3 inches but is below 18 inches, damage may be major or minor, depending on the following factors: duration of the flood, contaminants in the water, if waterline reached electrical outlets, and number of essential living spaces flooded. - Waterline in a finished basement. - Damage to mechanical components (e.g., furnace, boiler, water heater, heating, ventilating, and air conditioning (HVAC), etc.) - Damage or disaster-related contamination to a private well or septic system.	- Nonstructural damage to roof components over essential living spaces (e.g., shingles, roof covering, fascia board, soffit, flashing, and skylight). - Nonstructural damage to the interior wall components, to include drywall and insulation. - Nonstructural damage to exterior components. - Multiple small vertical cracks in the foundation. - Damage to chimney (i.e., tilting, falling, cracking, or separating from the residence). - Damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.). - Damage or disaster-related contamination to a private well or septic system.

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Major	The residence has sustained significant structural damage and requires extensive repairs.	Above 18 Inches	- Waterline above 18 inches or the electrical outlets in an essential living space. - Waterline on the first floor (regardless of depth) of a residence when basement is completely full. - When waterline exceeds 3 inches but is below 18 inches, damage may be major or minor depending on the following factors: duration of the flood, contaminants in the water, if waterline reached outlets, and number of essential living spaces flooded.	- Failure or partial failure to structural elements of the roof over essential living spaces to include rafters, ceiling joists, ridge boards, etc. - Failure or partial failure to structural elements of the walls, to include framing, etc. - Failure or partial failure to foundation, to include crumbling, bulging, collapsing, horizontal cracks of more than 2 inches, and shifting of the residence on the foundation of more than 6 inches.
Destroyed	The residence is a total loss: (e.g., damaged to such an extent that repair is not feasible, requires demolition, and/or confirmed to be in imminent danger).	Above Roofline	- Waterline at the roofline or higher, or - Complete failure of two or more major structural components (e.g., collapse of basement walls, foundation, walls, or roof).	- Only foundation remains. - Complete failure of two or more major structural components (e.g., collapse of basement walls, foundation, walls, or roof). - The residence has a confirmed imminent danger (e.g., impending landslides, mudslides, or sinkholes).
Inaccessible	Damage to residence cannot be visually verified.	N/A	Flood waters are blocking access to residences by covering, washing out, or destroying roads, bridges, or access routes, and degree of damage cannot be visually verified.	Debris from landslides, mudslides, severe soil erosion, or blowdown is blocking access to residences by disrupting or destroying roads, bridges, or access routes and degree of damage cannot be visually verified.

APPENDIX I: INDIVIDUAL ASSISTANCE HOUSING INSURANCE MATRIX

Table 22 provides the IA housing insurance matrix.

Table 22: IA Housing Insurance Matrix

Insurance Type	Property Covered	Property Not Covered	Perils Covered	Perils Not Covered
Flood	<i>Owners Only:</i> All real property from the first floor above ground level up; real property in basement below ground level necessary for habitability (e.g., structural wall, furnace, water heater, and main panel); separate structures, such as storage buildings; cost of preventing flood damage to home; and removal of debris deposited by covered peril. <i>Homeowners and Renters:</i> Property in basement necessary for habitability (e.g., washer and dryer), all personal property in dwelling and separate enclosed structures (see property not covered), and personal property stored away from premises.	<i>Real Property:</i> Water wells, well pumps, oil or propane tanks, septic tanks, seawalls, retaining walls, washouts (access), and dikes. <i>Personal Property:</i> Property stored in basements below grade level, as identified by the individual policy.	General condition of flooding, (e.g., overflow of inland or tidal waters, the unusual and rapid runoff or accumulation of surface waters from a source), mudflow/mudslide, and seepage caused by flood (e.g., ground saturation or seeping under doors from rising water) {Note: Not all perils listed are included nationwide or in outside the continental United States (OCONUS) areas. Consult with local/state or municipalities insurance commissioners for details.}	Anything other than perils listed, e.g., wind-driven rain (WDR), landslide, sewer backup when no general flood exists, and seepage not caused by flood (e.g., melting snow or WDR blowing water under doors). {Note: Not all perils listed are excluded nationwide or in OCONUS areas. Consult with local/state or municipalities insurance commissioners for details.}
Earthquake, Sewer Backup, and Other Riders	All property covered by the policy rider.	All property excluded from coverage under the policy the rider is attached.	Only the peril(s) specified on the rider.	All perils except those specified by the rider.
Homeowners or Renters	<i>Owners:</i> All real property, including separate structures; removal of debris deposited by covered peril; personal property; and additional living expenses (ALE) for covered perils. <i>Renters:</i> All personal property, including personal property away from premises and ALE for covered perils.	Seawalls, retaining walls, and washouts (access).	Wind; hail; lightning; falling objects, including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; and power surge explosion.	Surface waters or flood, rain through doors, windows or bad roof, seepage, landslides, mudslides, earthquake, and sewer backup. Sewer backup is usually covered in an endorsement to the policy.

Insurance Type	Property Covered	Property Not Covered	Perils Covered	Perils Not Covered
Manufactured Home	Manufactured home, including separate structures; removal of debris deposited by covered peril; cost of emergency repairs or removal to protect the manufactured home; ALE for covered perils; and all personal property, including personal property away from premises. Structural-only coverage excludes personal property and ALE coverage.	Seawalls and washouts (outside damage).	Wind; hail; lightning; falling objects, including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; power surge; and explosion. Flood may not be covered, depending on the contract.	Sewer backup; leakage from rain, snow, or sleet; freezing or electrical failure, mudslide, and earthquake. Flood may not be covered, depending on the contract. Electrical failure does not pertain to power surges, only to situations where electrical service stops and there is no damage to the home.
Condominium	<i>Unit:</i> Structural elements not shared by other tenants or owned by the association, generally from the sheetrock in, including sheetrock, paneling, and wall covering; ALE for covered perils; and all personal property, including personal property away from premises. <i>Master:</i> Structural elements shared by other tenants or owned by the association, generally from the studs out.	Seawalls, retaining walls, and washouts (access).	Wind; hail; lightning; falling objects, including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; and power surge explosion.	Surface waters or flood; rain through doors, windows, or bad roof; landslides; mudslides; earthquake; sewer backup; leakage from rain, snow, or sleet; and freezing or electrical failure.

APPENDIX J: PUBLIC ASSISTANCE WORK ELIGIBILITY MATRIX

Table 23 provides the PA work eligibility matrix.

Table 23: Public Assistance Work Eligibility Matrix

Eligibility Factor	Category A: Debris Removal	Category B: Emergency Protective Measures	Category C: Roads and Bridges	Category D: Water Control Facilities	Category E: Buildings and Equipment	Category F: Utilities	Category G: Parks, Recreational, Other Facilities
Work	Debris types include the following: • Vegetative • Construction and demolition • Hazardous waste • Household hazardous waste • White goods (household appliances) • Electronic waste • Soil, mud, and sand • Vehicles and vessels • Putrescent waste • Infectious waste • Chemical, biological, radiological, and nuclear (CBRN) contaminated	Emergency protective measures include the following: • Pre-positioning resources • Expenses related to operating a facility or providing a service • Emergency public transportation and communication • Flood fighting • Emergency operations centers • Emergency access • Supplies and commodities • Meals • Medical care • Evacuation and sheltering • Infectious disease events • Mosquito abatement • Mold remediation • Animal carcasses	Road components include the following: • Surfaces • Bases • Shoulders • Ditches • Drainage structures • Low water crossings • Associated facilities Bridge components include the following: • Decking • Guardrails • Girders • Pavement • Abutments • Piers • Slope protection	Water control facilities include the following: • Dams and reservoirs • Levees and floodwalls • Lined and unlined engineered drainage channels • Canals • Aqueducts • Sediment and debris basin • Storm water retention and detention basins • Coastal shoreline protective devices • Irrigation facilities	Buildings include all structural and non-structural components, including mechanical, electrical, and plumbing systems; contents and equipment within the building; and furnishings. Equipment includes vehicles and construction equipment.	Utilities include the following: • Water storage facilities, treatment plants, and delivery systems • Power generation, transmission, and distribution facilities • Natural gas transmission and distribution plants • Sewage collection systems and treatment plants • Communication systems	Publicly owned facilities include the following: • Mass transit facilities • Beaches • Parks • Playground equipment • Swimming pools • Bath houses • Tennis courts • Boat docks • Piers • Picnic tables • Golf courses • Ballfields • Fish hatcheries • Ports and harbors • Other facilities that do not fit in Categories C to F

		• Residential electrical meters safety inspections • Demolition of private structures • Temporary relocation of essential services • Snow-related activities • Emergency berms on beaches • Temporary emergency repair or stabilization • Temporary slope stabilization	• Approaches • Associated facilities	• Pumping facilities • Navigational waterways and shipping channels			
Applicant	State and territorial governments, federally recognized tribal governments, local governments, and certain private nonprofit (PNP) organizations are eligible applicants. A PNP is potentially eligible only if it is 501(c), (d), or (e) tax exempt and owns or operates a facility that provides a “critical service” (defined as education, utility, emergency, or medical) or a non-critical, essential social service that is provided to the general public. Refer to the <i>Public Assistance Program and Policy Guide</i> (PAPPG) for additional details.						
Facility	A facility is a building, works, system, or equipment or improved and maintained natural feature. To be eligible, the facility must be owned by or the legal responsibility of a state, local, tribal, or territorial (SLTT) government or owned by or the legal responsibility of a PNP organization that provides educational, utility, emergency, medical, or custodial care and other social-type essential services. Mixed-use facilities are only eligible if more than 50 percent of the physical space is dedicated to eligible work. Inactive facilities or facilities under a specific authority of a federal agency (except public housing) are not eligible.						
Cost	Costs must be directly tied to the performance of eligible work; adequately documented; reduced by all applicable credits (e.g., insurance proceeds and salvage values); authorized and not prohibited under applicable laws and regulations; consistent with the applicant’s internal policies, regulations, and procedures; and necessary and reasonable. Costs are considered reasonable when they are as follows: • Recognized as ordinary and necessary; • Comparable to current market price based on historical documentation, average cost in the area, or published unit costs from national databases; • Above current market price for valid reasons, (e.g., shortage of equipment, materials, supplies, labor, or contractors); • Within the context of exigent circumstances; • Part of ethical business practices; and • Aligned with all procurement requirements.						

APPENDIX K: PUBLIC ASSISTANCE WORK ASSESSMENT MATRICES

Table 24 provides the PA work assessment matrix (Category A).

Table 24: Public Assistance Work Assessment Matrix (Category A: Debris Removal)

Information	Description of Information Needed	✓	Supporting Documentation/Validation
Location of Debris	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location for roads, rights-of-way, private property, waterways, parks, etc.	☐	Annotated maps.
Location of Debris Operations Facilities	USNG location for reduction sites, disposal sites, pickup locations, etc.	☐	
Work Completed	Percent of debris removal completed at time of assessment.	☐	Brief statement of percentage of work completed at time of assessment.
Debris Type (classification) and Quantity per Type	Provide total quantity of debris to be removed (including debris already moved) by type of debris:	☐	Photographs (to show work completed, work to be completed, and locations where estimates were developed).
	• Vegetative • Construction and demolition • Hazardous waste • Household hazardous waste • White goods (household appliances) • Electronic waste • Soil, mud, and sand • Vehicles and vessels • Putrescent waste • Infectious waste • Chemical, biological, radiological, and nuclear (CBRN) contaminated	☐	
Type of Work	Is the work, force account, contract, or a combination of both?	☐	Brief statement about whether work is force account, contract, or a combination.
Force Account Labor Costs	Provide regular time and overtime hours and rates for all force account labor.	☐	Labor cost summary (separate out regular time and overtime).
		☐	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Provide time and rate of all force account equipment used.	☐	Equipment cost summary.
Force Account Supply Costs	Provide a list of all force account supplies used and their cost.	☐	Supply cost summary.
Contract Costs	Provide actual costs or the costs estimates of all contracts.	☐	For large projects, provide contractor bids or invoices and disposal invoices.
Unit Costs	Cost per ton or cubic yard with explanation of calculation.	☐	Brief statement explaining calculation.

Information	Description of Information Needed	✓	Supporting Documentation/Validation
Recycling or Reusing Debris?	Yes/No	☐	N/A
Unique Removal Requirements	For example, special equipment, long hauls, staging, reduction, hazardous materials, local ordinances, etc.	☐	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	☐	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation Considerations	Narrative describing environmental and historic preservation considerations.	☐	Relevant documentation validation environmental and historic preservation considerations.

Table 25 provides the PA work assessment matrix (Category B).

Table 25: Public Assistance Work Assessment Matrix (Category B: Emergency Protective Measures)

Information	Description of Information	✓	Supporting Documentation/Validation
Location(s)	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location.	☐	Notated maps.
Type of Emergency Protective Measures	Details of the emergency protective measures required.	☐	Description of the emergency protective measures required.
Type of Work	Force account, contract, mutual aid, or combination.	☐	N/A
Force Account Labor Costs	Regular time and overtime hours and rates.	☐	Labor cost summary (separate out regular time and overtime).
		☐	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	☐	Equipment cost summary.
Force Account Supply Costs	List supplies used and cost.	☐	Supply cost summary.
Material Costs	List of materials and cost per unit.	☐	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.
Contract Costs	Actual or estimates.	☐	Contracts, bids, invoices (required for large projects), historic costs for similar work, estimates by professionals familiar with the facility, or commercial estimating source.
Unique Requirements	Narrative describing unique requirements impacting cost.	☐	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	☐	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	☐	Relevant documentation validation EHP considerations.

Table 26 provides the PA work assessment matrix (Categories C to G).

Table 26: Public Assistance Work Assessment Matrix (Categories C to G)

Information	Description of Information	✓	Supporting Documentation/Validation
Location(s)	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location.	☐	Notated maps.
Facility Type (structure and materials)	Structure: Road, bridge, road element, building, works, system (e.g., water distribution system), or equipment. Materials: Damaged materials of the facility.	☐	Photographs.
Repair or Replacement	Justification for repair or replacement.	☐	
Damage Dimensions	Size, length, capacity, etc., of damage.	☐	
Damaged Elements/Equipment/Building Contents	Individual elements of the facility that have been damaged.	☐	Recent safety inspection or maintenance records that show pre-disaster condition (large projects only).
		☐	Codes and standards to be considered (when it dramatically increases cost).
Type of Work	Force account, contract, or combination.	☐	Brief statement about whether work is force account, contract, or a combination.
Force Account Labor Costs	Regular time and overtime hours and rates.	☐	Labor cost summary (separate out regular time and overtime).
		☐	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	☐	Equipment cost summary.
Force Account Supply Costs	List supplies used and cost.	☐	Supply cost summary.
Material Costs	List of materials and cost per unit.	☐	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.
Contract Costs	Actual or estimates.	☐	Contracts, bids; invoices (required for large projects), historic costs for similar work, estimates by professionals familiar with the facility, or commercial estimating source.
Unique Requirements	Narrative describing unique requirements impacting cost.	☐	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	☐	Relevant documentation validating impact on community functions.

Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	☐	Relevant documentation validation EHP considerations.
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