



FEMA Preliminary Damage Assessment Guide

June 2024 (Draft 1.0)



FEMA

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This document is for developmental purposes only and may contain gaps in information and require additional editing for grammar, unified voice, and the correction of content format and flow. It is provided to assist in the identification of additional content and for the correction of content errors that may exist in the document. This document should not be considered a final draft.

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1 CHAPTER 1: INTRODUCTION

2 Purpose

3 The Federal Emergency Management Agency (FEMA) *Preliminary Damage Assessment*
4 *Guide* (PDA Guide) defines a standard national-level framework for how state, local, tribal,
5 and territorial (SLTT) government officials, FEMA staff, and all other partners collect,
6 validate, quantify, and document the cause, location, and details of damage following a
7 disaster.¹

8 The standard framework of the PDA Guide helps emergency management officials at all
9 levels of government efficiently complete accurate and consistent preliminary damage
10 assessments (PDA) that align with Robert T. Stafford Disaster Relief and Emergency
11 Assistance Act (Stafford Act) Presidential disaster declaration request requirements.

12 The FEMA PDA Guide is a resource SLTT governments can use before disasters to familiarize
13 themselves with the PDA process as well as during disaster recovery to support PDA
14 coordination as an operational reference in the field. The following overarching objectives of
15 the PDA Guide are designed to ensure disaster recovery assistance is delivered
16 expeditiously to individual survivors and communities affected by natural or man-made
17 events:

- 18 • Promote accuracy by clearly defining the information and documentation that FEMA
19 requires during the joint PDA process to assess damage and support requests for
20 Stafford Act assistance;
- 21 • Promote efficiency by supporting emergency management officials at all levels of
22 government;
- 23 • Promote a uniform approach by standardizing the processes and criteria used to
24 assess damage to residential homes for Individual Assistance (IA) requirements;
- 25 • Promote a uniform approach by standardizing the processes and criteria used to
26 assess damage to any buildings or infrastructure for Public Assistance (PA)
27 requirements;
- 28 • Establish roles, responsibilities, and the process related to the damage assessment
29 framework and standards for teams supporting the joint PDA process;
- 30 • Provide SLTT partners with descriptions of common types of Stafford Act damage
31 assessments and the methods for obtaining information for each type; and
32 • Introduce streamlined information and resource requirements for damage
33 assessments.

¹ Federally recognized Tribal Nations 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).

34 How to Read this Guide

35 The first two chapters of the PDA Guide establish a foundation for the PDA process and
36 describe how to conduct the PDA. Chapter 3 summarizes common damage assessment
37 methodologies. Chapter 4 and Chapter 5 provide operational guidance that is specific to
38 conducting IA PDAs and PA PDAs, respectively, and they provide program-specific
39 information on PDA-related requirements.

40 Scope and Applicability

41 PDAs provide valuable information that inform many aspects of the disaster response and
42 recovery process. However, the scope of the PDA Guide focuses on damage assessments
43 that support a request for federal assistance through a Stafford Act Presidential disaster
44 declaration.² The PDA Guide answers the following questions for SLTT governments seeking
45 information on the PDA process or seeking FEMA assistance:³

- 46 1. What information does FEMA need from the initial damage assessments (IDA)?
- 47 2. How should that information be collected?
- 48 3. What standards does FEMA have for validating damage?
- 49 4. What are the special considerations for Tribal Nations?

50 The intended audience of the PDA Guide includes:

- 51 1. Emergency managers who conduct IDAs and participate in joint PDAs;⁴
- 52 2. SLTT government emergency managers who review IDA data and participate in joint
53 PDAs; and
- 54 3. FEMA staff who validate the IDA, participate in the joint PDA process, and provide
55 technical assistance to SLTT governments on the PDA process.

56 The PDA Guide provides limited information on IA and PA declaration requirements. Readers
57 should refer to the [Individual Assistance Program and Policy Guide \(IAPPG\)](#) or the [Public
58 Assistance Program and Policy Guide \(PAPPG\)](#) for comprehensive information on program
59 eligibility.

60 Following an incident, the FEMA Administrator may delegate additional responsibilities to the
61 Regional Administrator (RA) to conduct activities necessary to prepare and pre-position
62 federal resources for an event for which a declaration under the Stafford Act is reasonably
63 likely and imminent and to assess the impact of an event. As PDAs are a responsibility

² PDAs are not required for emergency declaration requests. For more information see Form 010-0-13 Request for Presidential Declaration.

³ 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 Tribal Nation under the Federally Recognized Indian Tribe List Act of 1994 (42 U.S.C. 5122).

⁴ States, Tribal Nations, and territories may use different terminology for the same IDA process, such as Initial Damage Estimate.

64 delegated to the RA, and further delegated to the appointed Federal Coordinating Officer
65 (FCO) following the disaster declaration, each FEMA Region and SLTT government should
66 evaluate its need to develop supplemental guidance to address region-specific
67 considerations that are missing from the national-level framework outlined in the PDA
68 Guide. Some considerations that may impact the approach and methodology for a PDA
69 process include differences in hazard types, damage levels, and SLTT government
70 operational capabilities.

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

Key Terms

Terminology pertaining to the PDA process is derived from FEMA PA doctrine, FEMA IA doctrine, and other federal guidance. Key terms that appear throughout this document include:

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).

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

Joint Preliminary Damage Assessment (joint PDA): The coordinated effort by SLTT and federal authorities to validate damage data previously identified through the IDA by state, Tribal Nation, and local authorities to inform Presidential disaster declaration requests and federal disaster grant determinations.

Preliminary Damage Assessment (PDA): The PDA consists of the IDA followed by a joint PDA. The PDA is process used determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and communities as a whole.

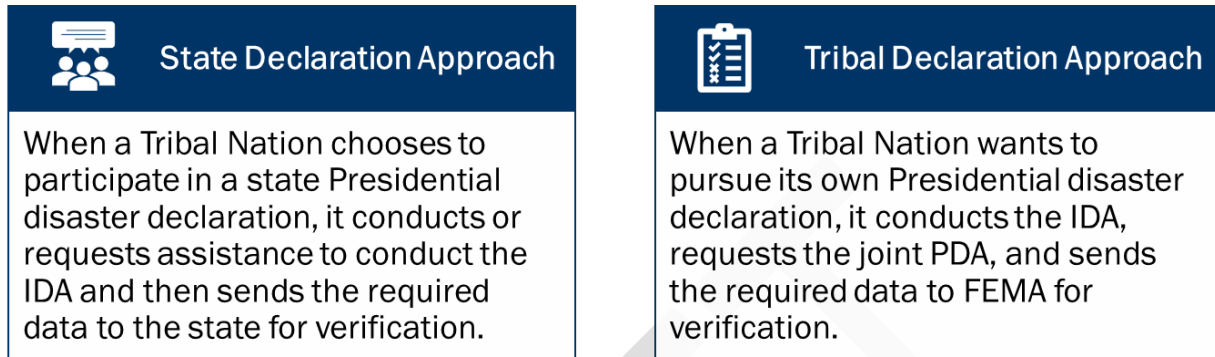
Recipient: A non-federal entity (e.g., state, Tribal Nation, or territorial government) that receives an award from a federal agency to carry out an activity under a federal program.

Subrecipient: An Applicant that receives a subaward from a recipient to carry out part of a federal program.

74 Tribal-Specific Guidance

75 The Stafford Act provides Tribal Nations with the authority to request their own major
76 disaster declaration or emergency declaration from the President. In 2013, the Sandy
77 Recovery Improvement Act (SRIA) amended the Stafford Act to provide Tribal Nations with
78 the option to seek Stafford Act assistance independent of a state if they so choose. At their
79 own discretion, Tribal Nations may choose to request a Presidential disaster declaration

80 independently or choose to join a state disaster declaration. Therefore, Tribal Nations have
81 several options for how they may participate in the PDA process. Further, Tribal Nations have
82 the flexibility to conduct the PDA process as they see fit in coordination with the applicable
83 FEMA Region. Figure 1 provides a brief overview of how Tribal Nations may approach PDAs.



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Figure 1. Tribal Nations Options for PDAs

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While Tribal Nations have the option to pursue their own declaration or join the state’s declaration, they may also switch between the two options during the PDA process. For example, a Tribal Nation may conduct the IDA and joint PDA with the state, but then elect pursue its own declaration. The Tribal Nation may work with the region to switch between either declaration option until the recommendation for FEMA disaster assistance is sent to the RA.

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The PDA Guide highlights different options or processes for Tribal Nations when possible. For additional information, refer to Appendix D: Tribal-Specific Considerations.

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Supersession

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This document supersedes the 2021 PDA Guide.

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Authorities and Foundational Documents

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

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- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, 42 United States Code (U.S.C.) §§ 5121 et seq.
- Title 44 of the Code of Federal Regulations (CFR), “Emergency Management and Assistance §§ 206.33 et seq.”
- Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et seq.).
- *Sandy Recovery Improvement Act (SRIA)*, January 2013.
- Presidential Policy Directive 8 (PPD-8), “National Preparedness,” March 30, 2011.
- Homeland Security Presidential Directive 5 (HSPD-5), “Management of Domestic Incidents,” February 28, 2003.

- 108 • *National Response Framework (NRF)*, October 2019.
- 109 • *National Incident Management System (NIMS)*, October 2017.
- 110 • *National Disaster Recovery Framework*, June 2016.
- 111 • *National Mitigation Framework*, June 2016.
- 112 • *FEMA Publication 1*, November 2019.
- 113 • *Disaster Operations Keystone*, TBD.
- 114 • *Joint Recovery Office Guide*, June 2021.
- 115 • *FEMA Direct Housing Guide*, July 2021.
- 116 • *Individual Assistance Program and Policy Guide v1.1 (IAPPG)*, FP 104-009-03, May
- 117 2021.
- 118 • *Individual Assistance Declarations Factors Final Guidance*, June 2019.
- 119 • *Public Assistance Program and Policy Guide V. 5 (PAPPG)*, FP 104-009-2, June 2020.
- 120 • *FEMA Tribal Disaster Declarations Pilot Guidance*, Version 2 January 2017.
- 121 • *Sections 308, 309, and 616 of the Robert T. Stafford Disaster Relief and Emergency*
- 122 *Assistance Act (Stafford Act)*, 42 U.S.C. §§ 5151, 5152, and 5196f.
- 123 • *Title VI of the Civil Rights Act of 1964*.
- 124 • *Section 504 of the Rehabilitation Act of 1973*.
- 125 • *Title IX of the Education Amendments Act of 1972*.
- 126 • *Age Discrimination Act of 1975*.
- 127 • *IA Interim Final Rule on Individual Assistance Program Equity*.

128 Figure 2 shows the linkages between the PDA Guide and related FEMA Office of Response
 129 and Recovery (ORR) doctrine.

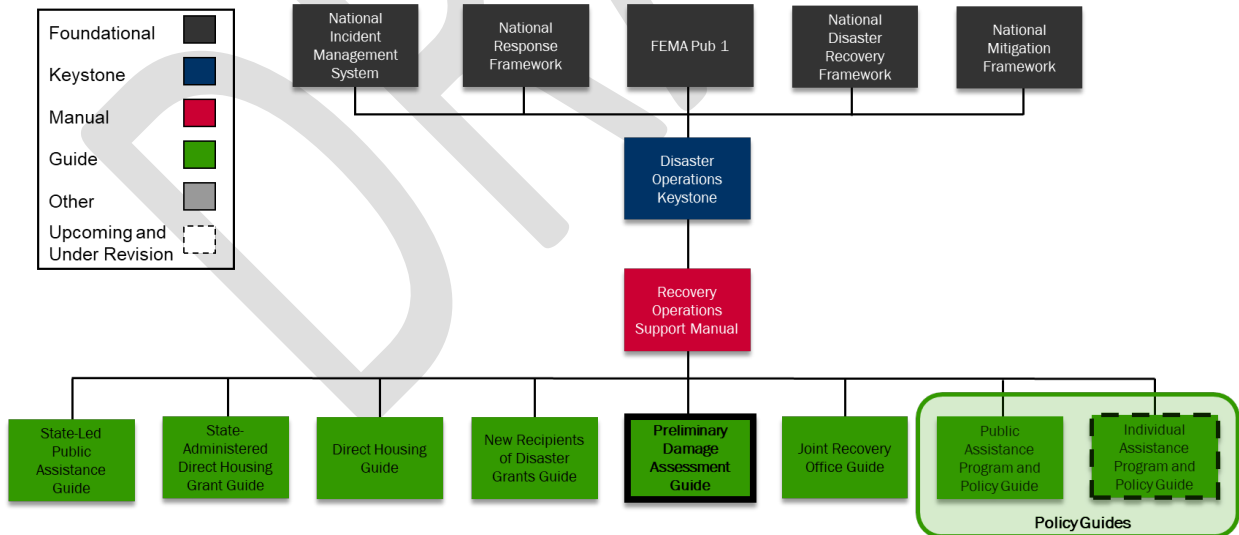


Figure 2. FEMA Doctrine Hierarchy

132 **Document Management and Maintenance**

133 FEMA ORR’s Doctrine and Policy Office is responsible for the management and maintenance
134 of this document. Comments and feedback from FEMA personnel and stakeholders
135 regarding this document should be directed to the ORR Doctrine and Policy Office ([FEMA-
136 ORR-Doctrine@fema.dhs.gov](mailto:FEMA-ORR-Doctrine@fema.dhs.gov)) at FEMA headquarters (HQ).

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137 CHAPTER 2: PRELIMINARY DAMAGE ASSESSMENT

138 OVERVIEW

139 Chapter 2 provides an overview of PDAs—one step in a larger federal assistance process—
140 which capture the impacts of a disaster and inform a request for a Presidential disaster
141 declaration. Chapter 2 outlines each step of the PDA process and explains why and how a
142 PDA may vary across different disaster scenarios depending on geographical considerations
143 and the severity and magnitude of impacts. The chapter concludes with an overview of PDA
144 roles within the FEMA Regional office, FEMA HQ, and SLTT governments.

145 Process Overview

146 Figure 3 demonstrates the links between the PDA process and the Presidential disaster
147 declaration process. Refer to the FEMA's [How a Disaster Gets Declared](#) for additional
148 information on FEMA's Presidential Disaster Declaration Process.

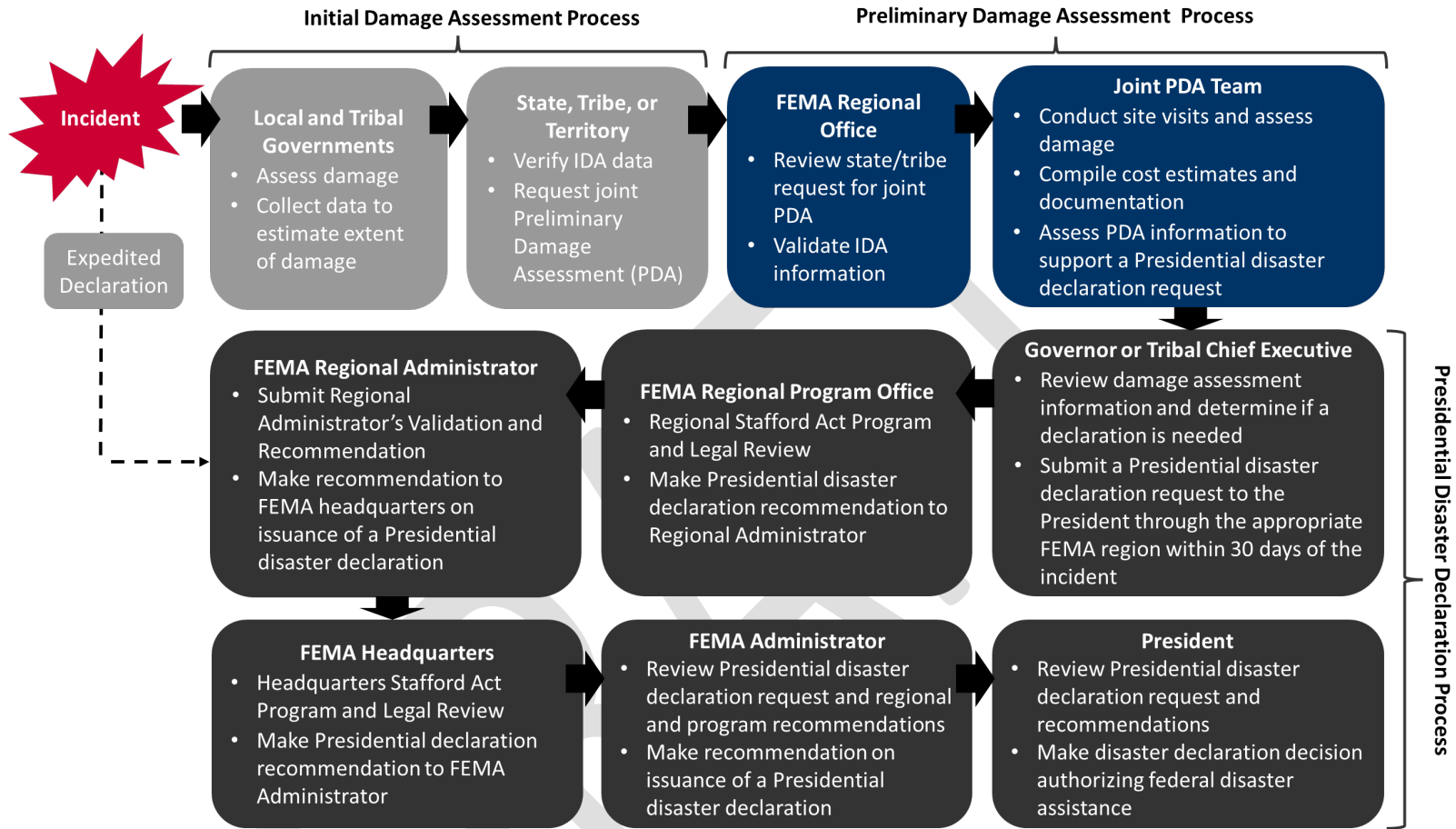
FEMA Templates and Resources

FEMA has developed several templates and resources that help the SLTT government complete the IDA, or the joint PDA team validate damage. This includes:

- A draft template letter to help the state, Tribal Nation, or territory request a joint PDA with FEMA
- PDA narrative report
- IA Street Sheet
- PA Site Sheet
- IA damage assessment matrices
- PA work eligibility matrices
- PA work assessment matrices
- Mobile Survey Templates
- Mapping Software (FEMA Field Assessment Collection Tool (FACT))

The resources are updated frequently. For the most up-to-date forms, refer to [FEMA.GOV/PDA](https://www.fema.gov/pda).

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Figure 3. PDA and Presidential Disaster Declaration Process Linkages

153 **Key Objectives of the PDA Process**

154 The primary objective of the PDA process is to collect data on disaster related damages for
 155 impacted communities, inform the state, Tribal Nation, or territorial (STT) government’s
 156 request for a declaration, and to help FEMA provide a recommendation to the President for
 157 a disaster declaration request. The data collected during the PDA process informs the STT
 158 government's decision to request a Presidential disaster declaration, the RA's
 159 recommendation to the FEMA Administrator for the request, and the recommendation that
 160 FEMA makes to the President. The PDA may also help inform a long-term recovery strategy.
 161 Presidential disaster declarations specify whether jurisdictions are eligible for FEMA disaster
 162 assistance and what types of assistance are available.

163 **Key Considerations**

164 Table 1 describes the common factors and key considerations that impact the
 165 implementation of joint PDAs for IA and PA.

166 **Table 1. Key Considerations for the PDA Process**

Consideration	Description
Hazard or 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 inaccessible disaster areas are also possible depending on the disaster. For example, disasters such as tornadoes and hurricanes may produce readily visible damage (e.g., debris) that may be assessed through windshield surveys, while damage 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, may impact the PDA process. Other types of federal assistance include FEMA Mitigation and Fire Management Assistance Grants and U.S. Small Business Administration (SBA) loans.
State, Tribal Nation, Territory Resources, Disaster Frequency, and Experience	The capabilities and capacity of the state, Tribal Nation, or territorial government to conduct an IDA and/or to support the joint PDA may influence which PDA methods are used, such as fly-overs, windshield surveys, or door-to-door assessments. The state, Tribal Nation, or territory’s experience with disasters and familiarity with the joint PDA process may also impact how damage is assessed. This includes considerations for disasters which impact traditionally under-served or vulnerable populations where resources are limited.
Time Constraints	Based on the urgency of need resulting from the incident, FEMA and the state, Tribal Nation, or territory may establish a timeline for the joint PDA to be completed. This timeline may impact which methods are the most feasible for assessing and documenting damages.
Geographic, Environmental, and Safety Hazards	Geography, environmental, and safety hazards may impact the methods used for assessing and validating damage. On the ground factors may limit access, to include physical access and connectivity in such a way that methods for assessing and validating damages are restricted, requiring innovative approaches without compromising PDA integrity or validity.

Consideration	Description
Tribal Considerations	An impacted Tribal Nation's decision on its preferred role may determine how the PDA is conducted with a Tribal Nation. An impacted Tribal Nation may choose to pursue its own disaster declaration, join the state's disaster declaration, or alternate between declaration options. Incident impacts to Tribal Nation lands, tribal community members, and Tribal Nation facilities may not be limited to tribal lands or reservations and may cross county, state, and international boundaries.
Environmental and Historic Preservation	Depending on the impacted area, the PDA may require support from specialists from federal and state resource or regulatory agencies, such as the U.S. Army Corps of Engineers (USACE), the U.S. Fish and Wildlife Service (USFWS), or the State Historic Preservation Office (SHPO).

167 **Readiness and Planning for Preliminary Damage Assessments**

168 Effective planning and preparation are essential to accurately and efficiently assess
 169 damage. SLTT governments can better prepare themselves to complete IDAs and to receive
 170 supplemental federal assistance by developing an understanding of the information and
 171 documentation FEMA requires during the PDA process. Table 2 describes pre-incident
 172 readiness and planning activities a SLTT government may implement to prepare for PDAs
 173 based on available resources.

174 **Table 2. Pre-Incident Damage Assessment Readiness and Planning Activities**

Activity	Description and Benefit
Develop Standard Operating Procedure	Developing a standard operating procedure (SOP) that identifies event triggers and supplements or 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 within a state, local, tribal, and territorial (SLTT) government.
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.
Develop a PDA Plan of Action Template	Developing a template for joint preliminary damage assessment (PDA) data that standardizes the collection of disaster information and can expedite development of the PDA plan of action. The plan template may be included as an addendum to the SOP.
Assemble the Team	Assembling the team with the appropriate expertise prior to a disaster ensures alignment of available resources for lifesaving and life-sustaining operations. In some cases, non-emergency management personnel (who do not have responsibilities immediately following a disaster) can augment teams that would otherwise be impacted by diversions of emergency management personnel.
Pre-Arranged Contracts and Memoranda of Understanding	Prearranged Contracts or Memoranda of Understanding for services, including mobile applications, virtual sensing, or GIS capabilities, can expedite data collection during the initial damage assessment (IDA).
Train Personnel	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. Training resources are available at FEMA.gov/PDA.

Activity	Description and Benefit
Conduct Exercises	Conducting exercises can help validate protocols and processes, provide staff with opportunities to operationalize plans, and encourage relationship building among FEMA and SLTT governments.
Use Technology	Understanding technology options that support PDAs (e.g., aerial imagery and ground-level photography) and ensuring relevant stakeholders are familiar with these technologies is important for pre-incident readiness.
Data Management	Maintaining data on demographics and insurance coverage levels, having geospatial data mapping and analysis capacity, and establishing pre-existing communication channels with local governments and Tribal Nations as well as SLTT interagency partners to facilitate information collection during the IDA.
Establish Partnerships	Develop pre-existing relationships with the SLTT housing, infrastructure, natural resources, cultural resources, arts and humanities, education, and health authorities in order to rapidly collect information from these authorities on damage and impacts to these critical systems and activities already taken or underway by their federal counterparts to address impacts.

175 **PDA Process**

176 Except in the case of an expedited
 177 Presidential disaster declaration for a
 178 major disaster, PDAs are completed prior
 179 to the overall determination of the STT
 180 government’s eligibility for federal
 181 disaster assistance, regardless of which
 182 programs the STT government is
 183 requesting. To encourage consistency
 184 and efficiency, FEMA has developed a
 185 PDA process that provides the maximum
 186 amount of flexibility given the diversity of
 187 disasters, their impacts, and the
 188 resources available to support them.

189 FEMA has standardized two main
 190 practices during PDAs:

- 191 1. FEMA validates damage, it does
- 192 not identify damage; and
- 193 2. FEMA must visually confirm
- 194 damage and review

Expedited Declarations

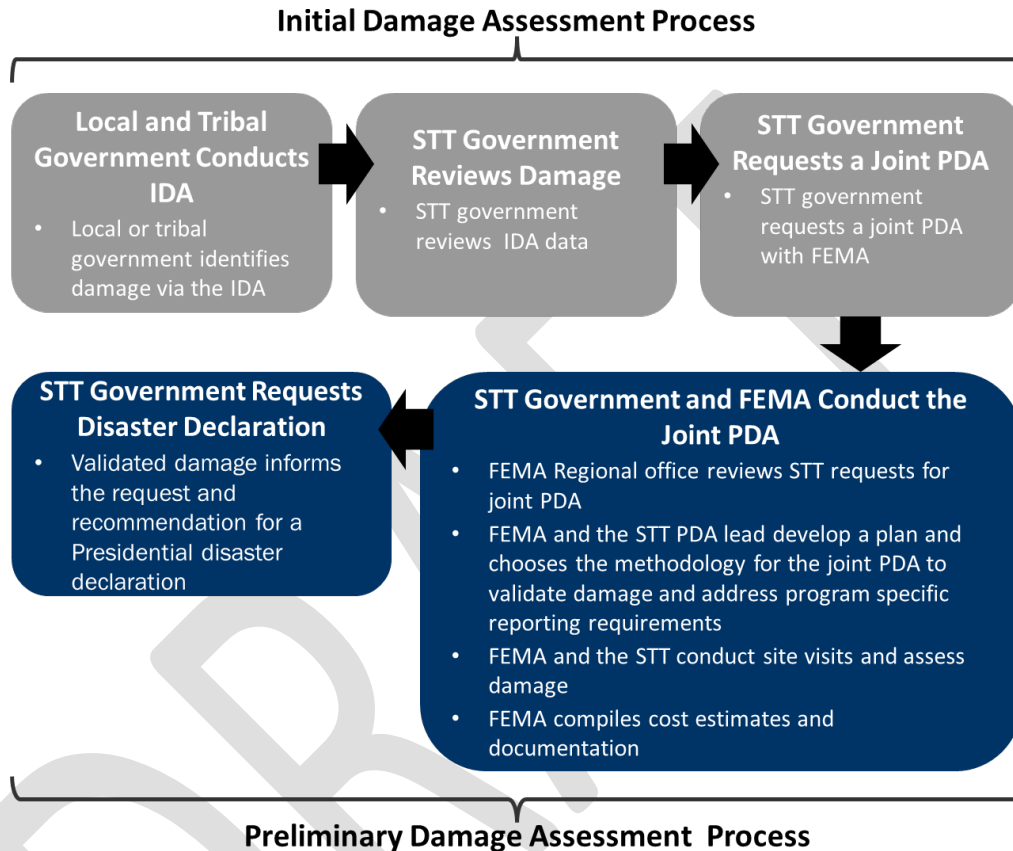
If the magnitude of anticipated or actual impacts of an incident are outside the resources of the STT government to respond, a STT government may request, and FEMA may submit a recommendation for a disaster declaration to the President with or without completing the joint PDA.

The joint PDA requirement may be waived for those incidents of unusual severity and magnitude that do not require damage assessments to determine the need for supplemental federal assistance or in other instances determined by the RA upon consultation with the state.

Depending on the extent of damage and accessibility of impacted areas, FEMA may also 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.

195 documentation to consider damage validated.⁵

196 After an incident occurs, impacted communities should follow the PDA process outlined in
197 Figure 4 to ensure timely federal assistance.



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Figure 4. PDA Process

200 Every PDA is conducted differently, and FEMA's standard process sets a baseline for
201 effective and timely coordination among emergency management officials at all levels of
202 government. In most cases, the PDA process is:

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1. The local government or Tribal Nation conducts the IDA;
2. The state, Tribal Nation, or territory reviews the IDA to verify the damage;
3. The state, Tribal Nation, or territory requests a joint PDA;
4. The state, Tribal Nation, or territory conducts the joint PDA with FEMA; and
5. Using the joint PDA, the state, Tribal Nation, or territory submits a request for a disaster declaration.

⁵ FEMA recognizes the importance of protecting the sacred sites of Tribal Nations. Therefore, for locations that are sacred to a Tribal Nation, site inspections by FEMA staff are not required; and FEMA will accept a Tribal Nation's certified damage assistance as a valid alternative to requiring FEMA staff to document and validate damage at sacred sites.

209 Certain steps may be compressed, executed concurrently, or expedited, depending on the
210 incident requirements and specific incident considerations. FEMA Regional offices have
211 wide latitude on how to conduct joint PDAs, which is determined in consultation with SLTT
212 government partners as part of the PDA plan. This flexibility can also aid in incorporating
213 equity and environmental, historic, and cultural considerations into the joint PDA process for
214 communities disproportionately impacted by the disaster.

215 **Local Government or Tribal Nations Conducts IDA**

216 The IDA provides the basis for determining whether it is necessary to conduct a joint PDA
217 and which FEMA program (IA and/or PA) will be evaluated during the PDA. IDAs capture
218 damage information and impacts for the joint PDA. Local governments and Tribal Nations
219 are encouraged to capture as much damage as possible during the IDA, as the STT
220 government can remove ineligible damage from the request for federal disaster assistance
221 requesting the joint PDA. If a joint PDA is required, thorough IDAs can expedite the joint PDA
222 process.

223 When an incident occurs, the STT government organizes and coordinates the required IDA
224 process with local governments to ensure its priorities and needs are effectively
225 communicated and captured. During the IDA, the local government or Tribal Nation identifies
226 and categorizes the degree of damage or estimated cost of assistance in its jurisdiction and
227 records all other information or data that might support the need for additional resources,
228 such as the capacity of local resources to support response and recovery efforts. While
229 conducting the IDA, the local government or Tribal Nation may receive support from the
230 state, the territory, or Non-Governmental Organizations (NGO). In some cases, a territory may
231 not include a local government, and the territorial government conducts the IDA. Similarly,
232 the state may conduct the IDA in areas where the local government does not have the
233 capacity to do so. The roles and responsibilities of the state, Tribal Nation, and territory are
234 flexible and can be adjusted based on the needs and capacity of the local government.
235 Figure 5 provides an overview of the IDA process.

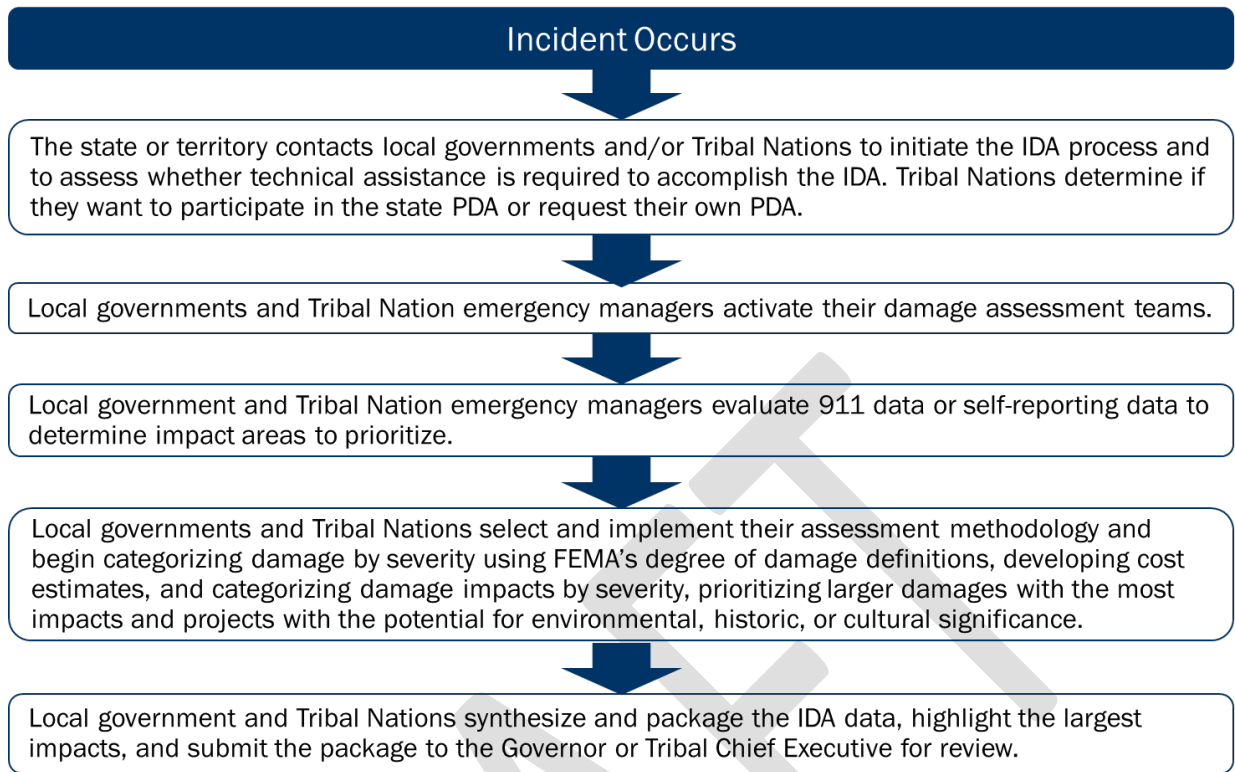


Figure 5. The IDA Process

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The IDA can document damage by taking pictures with geotags, using Geographic Information System (GIS) capabilities, and using drones from local, Tribal Nation, or state agencies to share imagery with the regional PDA teams to validate.

The region may maintain resources, templates, and data matrices that facilitate the IDA. STT governments may contact the regional office for technical support and access to resources that the region can share. For additional resources, refer to www.FEMA.gov/PDA.

Tribal Legal Requirements

Tribal Nations typically have legal responsibility for facilities and infrastructure, which includes tribal businesses and tribal member housing. For example, responsibility for individual homes financed through USDA and HUD grant programs often remain the responsibility of the Tribal Nation and ownership is not conveyed to the individual until the loan is paid in full. In this scenario the home would be potentially eligible under the PA program unlike a home purchased through a traditional mortgage. Additionally, some Tribal Nations finance the purchase of tribal member homes and/or otherwise assume the maintenance and repair responsibilities as a part of tribal responsibility.

A Tribal Nation should validate and identify who has legal responsibility for damaged facilities and infrastructure, to include housing, prior to a joint PDA. See Appendix D: Tribal-Specific Considerations for more information.

254 **STT Government Reviews Damage**

255 Following the IDA, the local government
 256 or Tribal Nation sends the data it
 257 collected to the state or territorial
 258 government. To request assistance
 259 separately from a state, a Tribal Nation
 260 can submit its IDA data directly to FEMA
 261 to start the joint PDA process.

262 States and territories that receive IDA
 263 data from local governments or Tribal
 264 Nations or from state or territorial
 265 agencies supporting the IDA should
 266 implement a method for validating the
 267 most impacted areas before requesting a
 268 joint PDA from FEMA.

269 The impact of disasters and the ability of
 270 STT governments to support recovery can
 271 vary greatly. The local government or
 272 Tribal Nation should collect a variety of
 273 disaster-related information to lend substantive data-driven content for requests for Stafford
 274 Act assistance. This information should illustrate the overall impact of the damage and
 275 underscore how the supplemental resources of the Federal Government are necessary to
 276 support disaster survivors, the community, and its infrastructure. STT governments may
 277 determine that IDA data supports asking FEMA to conduct a joint PDA and potentially a
 278 request for a Presidential disaster declaration to access federal disaster assistance.

279 Validating IDA information ensures the joint PDA accurately and efficiency conducted with
 280 FEMA. Table 3 lists common validation methods STT governments may use for IA and PA
 281 disaster declaration requests.

282 **Table 3. Validation Methods for IA and PA Joint PDA Requests**

Program	Validation Method
Individual Assistance	<ul style="list-style-type: none"> • Reviewing and analyzing photographs of a sample of disaster-impacted homes to ensure that local and Tribal Nations are categorizing degrees of damage correctly • Visiting areas with the most impacts in person • Evaluating basic IA eligibility requirements • Reviewing insurance policy information
Public Assistance	<ul style="list-style-type: none"> • Evaluating basic PA eligibility requirements • Reviewing and analyzing photographs of damaged buildings and infrastructure • Reviewing contracting or force labor account documentation

Technical Assistance

Prior to a joint PDA request, the STT 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;
- Regional chemical, biological, radiological, nuclear (CBRN) coordinators;
- Environmental Protection, Historic Preservation, and Floodplain Specialists;
- Program specialists; and
- Other subject matter experts (SME) necessary to advise STT emergency management officials and answer programmatic questions.

Program	Validation Method
	<ul style="list-style-type: none"> • Conducting site assessments, especially sites with complex damage, to help in establishing a more accurate cost estimate • Reviewing insurance policy information

283 **STT Government Requests Joint PDA**

284 Once the STT government has validated IDA information and the impacted jurisdictions are
 285 prepared, STT emergency managers should coordinate with their leadership. If the incident
 286 is of such severity and magnitude that resources needed to recover are expected to exceed
 287 the STT government’s capability, the director of the STT emergency management agency
 288 may request a joint PDA. The joint PDA request is made by submitting a joint PDA request
 289 letter signed by the governor or Tribal Chief Executive (TCE) to the appropriate FEMA
 290 Regional office. The joint PDA request letter should contain a list of disaster-impacted
 291 locations, a basic joint PDA plan of action, and the impact statement. FEMA does not impose
 292 specific requirements on how STTs conduct IDAs or validate the information it collected.
 293 However, when requesting a joint PDA, the STT government must provide the following
 294 information to the FEMA Regional Recovery Division for planning purposes:

- 295 • The type of damage to be validated, such as private (non-agricultural) and public,
 296 debris damage, emergency protective activities, and/or private nonprofits (PNP) and
 297 public facilities;
- 298 • The verified costs for each category of work;
- 299 • Location and geographic spread of the damage, whether it is an urban or rural area,
 300 the type of terrain, the accessibility to the area, and the counties, parishes, and
 301 municipalities impacted by the damage;
- 302 • Magnitude and severity of damage and all estimates from the IDA;
- 303 • Immediate known problems, such as:
 - 304 ○ Areas inaccessible because of debris, high water, or damage to streets, roads,
 305 and bridges;
 - 306 ○ Serious health hazards, including exposure to hazardous weather;
 - 307 ○ Requirements for emergency protective measures;
 - 308 ○ Damage to critical infrastructure (e.g., roads, bridges, railways);
- 309 • Widespread loss of critical facilities (e.g., hospitals, grocery stores) and essential
 310 utilities and shortages of food, water, and medical supplies;
- 311 • Summary of recent disaster declarations, including incidents when a disaster
 312 declaration was not granted;
- 313 • Summary of similar damage or repetitive damage from past events (declared or non-
 314 declared);
- 315 • Summary of underserved populations impacted by the event; and
- 316 • Summary of activities taken by Other Federal Agencies (OFA), if any, for coordination.

317 After the request, but prior to conducting a joint PDA, FEMA will review IDA information
318 provided and validated by the STT government. This may include the cause of damage,
319 impacted jurisdictions, location of damage, insurance coverage, and accuracy of the
320 damage categorizations completed by the STT government.

321 *STT Government Does Not Request Joint PDA*

322 In some cases, the STT government may complete the IDA and determine that the level of
323 damage does not warrant a disaster declaration. If the STT government elects not to request
324 a disaster declaration, it may consult with the FEMA Region to determine if there are
325 programs managed by OFAs that may support recovery operations. For additional
326 information, refer to [FEMA.gov/PDA](https://www.fema.gov/pda).

327 **STT Government and FEMA Conduct Joint PDA**

328 The joint PDA includes several steps and requires extensive coordination between SLTT
329 governments and FEMA. FEMA's standard joint PDA process sets a baseline for effective and
330 timely coordination among emergency management officials at all levels. In most cases, the
331 joint PDA process is:

- 332 1. The STT government develops the joint PDA plan of action;
- 333 2. The joint PDA team conducts damage assessments;
- 334 3. The SLTT governments and FEMA compile and share data;
- 335 4. The SLTT governments and FEMA assess and validate data; and
- 336 5. The STT governments evaluates the need for a disaster declaration request.

337 *STT Government Develops Joint PDA Plan of Action*

338 The STT government, with assistance from the FEMA Regional office is responsible for
339 coordinating with county or local jurisdictions included in the joint PDA request to develop a
340 joint PDA plan of action. The joint PDA plan of action for IA requests should include:

- 341 • The methodology for validating degree of damage information (e.g., door-to-door
342 assessments, windshield surveys, or other methods);
- 343 • A strategy for managing inquiries from the media, developed with input from the
344 Office of External Affairs (OEA);
- 345 • A list of damaged homes and their corresponding degrees of damage (i.e., destroyed,
346 major, minor, or affected);
- 347 • A list of homes that are inaccessible;
- 348 • A list of residential streets that are inaccessible;
- 349 • A list of roads that have lost utilities services;
- 350 • A list of any mitigation opportunities;
- 351 • A schedule for assessing damaged homes or neighborhoods, coordinated with local
352 governments, prioritizing the most heavily impacted areas and homes first; and

- 353 • A list of PDA team members and a list of team requirements (e.g., special
354 considerations that may require additional support from FEMA, such as language or
355 translation support, specialized assistance, etc.).

356 The joint PDA plan of action for PA requests should include:

- 357 • The methodology for validating damage and potential damage cost estimates and
358 reviewing detailed engineer cost estimates (e.g., site assessments);
- 359 • A strategy for managing inquiries from the media, developed with input from OEA;
- 360 • A list of the most extensive damages and their locations;
- 361 • A list of any mitigation opportunities;
- 362 • A schedule for assessing sites or interviewing Applicants, coordinated with local
363 governments, prioritizing the most heavily impacted areas first; and
- 364 • A list of PDA team members and a list of team requirements (e.g., special
365 considerations that may require additional support from FEMA, such as language or
366 translation support, specialized assistance, etc.).

367 FEMA IA and/or PA specialists should coordinate with the STT emergency management
368 agency to discuss the validated information submitted as part of the joint PDA request and
369 develop an overall joint PDA plan. FEMA may also consider other data when developing the
370 joint PDA plan of action. While the FEMA PDA team members will validate damage identified
371 by the STT government, the use of demographic or geospatial data may identify of
372 communities disproportionately impacted by the disaster. This data may help ensure
373 communities disproportionately impacted based on their pre-disaster vulnerability are
374 prioritized in the assessment and PDA process. Additional demographic and geospatial data
375 may better incorporate equity and environmental justice considerations into the joint PDA
376 process and direct assessments toward these disproportionately impacted communities.

377 Before conducting a joint PDA, the STT leads an initial briefing—with support from FEMA—to
378 present the joint PDA plan of action and review important information for the joint PDA team
379 (e.g., disaster and impact specifics, team breakdowns, communications and reporting,
380 safety, etc.).

381 The FEMA Regional office will identify FEMA joint PDA leadership, deploy staff, and
382 coordinate with OFAs, such as the US Army Corps of Engineers (USACE), the U.S. Small
383 Business Administration (SBA), the Environmental Protection Agency (EPA), the Natural
384 Resource Conservation Service (NRCS) and other traditional Recovery partners. STT
385 emergency management officials should identify joint PDA leadership, as well as staff that
386 can serve on joint PDA field teams.

387 *Joint PDA Team Conducts Damage Assessments*

388 After STT emergency management
389 officials have communicated the joint PDA
390 plan of action to local or county
391 emergency management officials, joint
392 PDA operations begin. Joint PDA teams—
393 also called damage assessment field
394 teams—should consist of at least one
395 representative from FEMA and one
396 representative from the STT government.

397 A local government representative familiar with the extent and location of damage in the
398 community should be included, if possible. For IA and PA requests, a representative from the
399 SBA, STT agencies, OFAs, and NGOs should also be included, whenever appropriate. Other
400 STT agencies, OFAs, and NGOs may also be asked to participate, as needed.

401 The joint PDA teams conduct the joint PDA to validate IDA information and determine the
402 extent of incident impacts that support a request for an IA and/or PA disaster declaration.
403 The PDA should be conducted to the point that:

- 404 • The scale and scope of the incident is properly assessed in order to determine if a
405 declaration is warranted;
- 406 • FEMA can adequately plan for the staffing and program delivery requirements for
407 field operations; and
- 408 • FEMA can adequately plan for the staffing and program delivery requirements to
409 establish a properly scaled Joint Field Office (JFO) with associated field offices and
410 Disaster Recovery Centers.

411 Local authorities help prioritize damage
412 sites and locate previously recorded
413 damage during the joint PDA. STT and
414 FEMA representatives are responsible for
415 validating damage recorded during the
416 IDA through visual confirmation and by
417 compiling site visit summaries and
418 damage estimates. Joint PDA field teams
419 are primarily intended to validate—not find—
420 damage and impact information already identified and validated by SLTT government
421 officials. However, joint PDA teams are encouraged to capture and validate any and all
422 damage identified by SLTT partners during the IDA.

423 The amount of damage that requires validation by FEMA depends on each individual
424 disaster. Damage should be validated to the fullest extent possible. Even within the same

FEMA Attire and Badges

FEMA employees must have a FEMA badge on them at all times. Whenever possible, FEMA employees participating in the joint PDA will wear FEMA branded clothing and badges. In some cases, the PDA coordinator in coordination with Safety Officer may provide incident-specific guidance for wearing FEMA branded clothing.

Data Sharing

FEMA recommends that SLTT government staff maintain their own copies of PDA information. However, because PDA data collection should not include any PII data, the PDA Overview PTA sets the standard that FEMA and SLTT governments can share IDA and PDA data without a formal data sharing agreement.

425 disaster, jurisdictions that
426 sustained different types of
427 damage may require different
428 validation approaches (e.g.,
429 windshield or door-to-door
430 assessments, flyovers, or
431 geospatial analysis) that must be
432 discussed by joint PDA teams.

433 ***SLTT Governments and FEMA***
434 ***Compile and Share Data***

435 Throughout the joint PDA process,
436 FEMA and SLTT government staff
437 should regularly discuss their
438 findings and reconcile differences
439 to reach a consensus. While
440 discrepancies may exist, the
441 rationale for decision-making
442 should be transparent. After joint
443 PDA teams conduct damage
444 assessments, FEMA will provide
445 STT emergency management
446 officials with a final summary of
447 the joint PDA findings, including
448 validated cost estimates.

449 ***STT Governments and FEMA***
450 ***Assess and Validate Data***

451 The PDA team will conduct a final
452 briefing to synthesize all PDA
453 summaries and reach
454 concurrence on damage
455 estimates. STT governments and
456 FEMA validate data by assessing
457 whether information is accurate,
458 complete, and sufficiently detailed. The final PDA reports are submitted to STT leadership.

459 Final PDA reports do not constitute an official eligibility determination for IA or PA. STT
460 governments are encouraged to submit additional documentation to expand on the impact
461 statement and address the IA, PA, or/or Tribal Nation declaration factors as part of a formal

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 a governor or Tribal Chief Executive 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.

The Interagency Coordination Division furthers the objectives of the National Disaster Recovery Framework (NDRF) by coordinating federal interagency support. ICD leads the interagency effort to drive resilient and equitable recovery in service of state, local, tribal and territorial partners. The division works to align incident operations and foster resource sharing to streamline, simplify, and support individuals and communities, as described in the NDRF.

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

462 request for a Presidential disaster declaration. FEMA will review this documentation prior to
463 making a recommendation to the President for providing federal assistance.

464 *STT Governments Evaluate the Need for a Declaration Request*

465 STT government leadership review the damage information validated through the joint PDA.
466 Based on this information, the STT government decides whether to request a Presidential
467 disaster declaration. The governor or TCE makes the request to the President through the
468 appropriate FEMA RA.

469 **STT Government Requests Presidential Disaster Declaration**

470 Impacted STTs that have decided to
471 pursue a Presidential disaster
472 declaration must submit a [Request for](#)
473 [Presidential Disaster Declaration](#) to their
474 FEMA Regional program office within 30
475 days of the end of the incident period.
476 Requests for deadline extensions must
477 be submitted within 30 days of the end
478 of the incident period.⁶

479 A major disaster declaration through the
480 Stafford Act triggers broad statutory
481 authority to coordinate and provide
482 federal disaster assistance. In addition to
483 steady-state federal programs that can
484 be leveraged post-disaster, the FEMA disaster assistance programs authorized after a
485 Presidential disaster declaration include:

- 486 1. The IA program: Assistance to individuals and households, including IA hazard
487 mitigation;
- 488 2. The PA program: Assistance to SLTT governments and eligible private nonprofits
489 (PNPs) for eligible debris removal, life-saving emergency protective measures, and
490 restoring public infrastructure, including PA hazard mitigation; and
- 491 3. The Hazard Mitigation Grant Program: Assistance for mitigation activities to protect
492 against future hazards.

Declaration Request Extensions

The Associate Administrator for Response and Recovery may extend the deadline if the governor or the TCE submits a written request and justification within the 30-day time period. FEMA may grant extensions when an STT government needs additional time to conduct a PDA if an impacted jurisdiction is:

- 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).

⁶ FEMA establishes the incident period, in coordination with National Weather Service, United States Geological Survey, or other validating agencies.

493 The FEMA Regional office reviews the request and validated information developed during
 494 the joint PDA. The FEMA RA submits a recommendation in the form of the Regional
 495 Administrator’s Validation and Recommendation (RVAR) to the Associate Administrator for
 496 ORR at FEMA HQ on whether the STT should receive a Presidential disaster declaration.
 497 Similar to the PDA, the RVAR assesses the STT government’s capacity to recover. Program
 498 offices at FEMA HQ and the FEMA Administrator then review the request package and attach
 499 the FEMA Administrator’s recommendation for submission to the President for a final
 500 decision.

Cumulative Effect of Recent Disasters

Recent disasters can have a dramatic impact on an STT government’s ability to recover. For this reason, FEMA considers all disasters that have impacted an STT within the last 24 months for IA requests and within the last 12 months for PA requests, per 44 CFR Part 206.48 (b) (1) (ii) (B).

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

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

501 **PDA Roles and Responsibilities**

502 Table 4 provides the general responsibilities for the primary components involved in PDAs.
 503 [Chapter 4: Individual Assistance Damage Assessments](#) and [Chapter 5: Public Assistance](#)
 504 [Damage Assessments](#) provide information on the specific roles, relationships, and
 505 responsibilities PDA team members have in the IA and PA PDA processes.

506 **Table 4. 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). In cases where a territory does not have a local government, the territorial government’s emergency management agency conducts the IDA.
Tribal Nation	At its discretion, the Tribal Nation can take on different roles, depending on how it chooses to request disaster assistance from FEMA. <ul style="list-style-type: none"> <li data-bbox="462 1738 1360 1837">• A Tribal Nation that chooses to participate in a state Presidential disaster declaration request conducts an IDA, shares information with the state, and participates in the joint PDA.

Component	Role
	<ul style="list-style-type: none"> A Tribal Nation that chooses to request its own Presidential disaster declaration directly with the President conducts the IDA and help FEMA coordinate the joint PDA process. In this capacity, the Tribal Nation 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 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, the Tribal Nation uses PDA data to develop data-driven written requests for Presidential disaster declarations. <p>At its discretion, the Tribal Nation may also alternate between pursuing its own declaration or participating in the state declaration. Under these circumstances, the Tribal Nation may coordinate with the FEMA Region to change its roles and responsibilities throughout the PDA process.</p>
State or Territorial Government	<p>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 and territories may provide appropriate vehicles, transportation, and/or other access to affected areas. States and territories review damage identified during the IDAs to decide whether to request a joint PDA from FEMA. State and territorial authorities participate in the joint PDA and share IDA documentation with FEMA. State and territorial authorities also determine whether to request a Presidential disaster declaration and develop data-driven written requests for Presidential disaster declarations.</p>
FEMA Region	<p>The state, Tribal Nation, or territory makes a request to the FEMA Region for a joint PDA. FEMA Regional staff work closely with the state, Tribal Nation, 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 recommendation based on declaration factors to FEMA headquarters (HQ) on whether the state, Tribal Nation, or territory should receive a Presidential disaster declaration. 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 may coordinate PDAs until such responsibilities are transitioned to another designee.</p>
Joint PDA Team	<p>The joint PDA team consists of federal state, territorial, Tribal Nation, and/or local government representatives. The joint PDA team conducts site visits to validate damage identified during IDAs.</p>

507 Roles and responsibilities described in this section are intended to give SLTT governments
508 and Federal Government emergency management officials the flexibility necessary to tailor
509 the PDA process to resources, threats, populations, and stakeholders while maintaining
510 standardization across the Nation.

511 While not every jurisdiction will have the resources or staff necessary to perform all of the
512 tasks outlined in this section, practitioners can use this information to develop a common
513 understanding of PDA roles at each level. This uniformity will allow the levels of government
514 that support the PDA process to develop common skills and an understanding that
515 underpins mutual aid networks and national uniformity.

516 **Local or Tribal Nations Roles and Responsibilities**

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

522 These best practices are implemented at the local, Tribal Nation, and county level.
 523 Governments may have different position names; however, the roles and responsibilities, as
 524 described in Table 5, should be considered as local or county damage assessment teams
 525 are determined.

526 **Table 5. Local or Tribal Roles and Responsibilities**

Local and Tribal Roles	Responsibilities
Local or Tribal Damage Assessment Coordinator	<ul style="list-style-type: none"> • 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 Nations, as appropriate.
Local or Tribal IA Damage Assessment Team Member	<ul style="list-style-type: none"> • 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).
Local or Tribal PA Damage Assessment Team Member	<ul style="list-style-type: none"> • Generally, representatives of 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.

527 **STT Government Roles and Responsibilities**

528 STT governments can lessen the time required to validate damage by working with local
 529 emergency managers to assess whether the information submitted is complete and aligned
 530 with established FEMA damage assessment and programmatic eligibility standards, and by
 531 providing technical expertise to local damage and impact assessment efforts.

532 STT government damage assessment staff serve as representatives on both joint PDA
 533 leadership and field teams. STT government representatives lead site assessments with
 534 FEMA support. Table 6 describes in greater detail the roles and responsibilities for STT
 535 governments as they relate to the damage assessment process. The STT government is not
 536 expected to fill every role included in Table 6 and it may assign staff based on the
 537 magnitude of the incident. The STT government may also augment its capabilities with

538 support from Voluntary Organizations Active in Disaster (VOAD) or other voluntary agency
 539 partners.

540 **Table 6. STT Government Roles and Responsibilities**

State, Tribal, or Territorial Roles	Responsibilities
State, Tribal, or Territorial Government Damage Assessment Coordinator	<ul style="list-style-type: none"> Serves as the principal state, Tribal Nation, or territorial (STT) representative overseeing damage assessment and validation. Responsible for ensuring that initial damage assessments are appropriately supported, ensuring state, local, tribal, and territorial (SLTT) government staff are prepared to validate 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	<ul style="list-style-type: none"> Serves as the STT 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, validating IA-related information submitted by local or county emergency managers, and serving as the primary STT government programmatic representative during the joint PDA.
State, Tribal, or Territorial Government IA Damage Assessment Team Member	<ul style="list-style-type: none"> May also be deployed to provide subject matter expertise or other technical support to impacted jurisdictions during the local damage assessment and STT government validation phases. Responsible for representing the STT government as part of the joint PDA.
State, Tribal, or Territorial Government Voluntary Agency Liaison (VAL)	<ul style="list-style-type: none"> Assigned to support damage assessments; reports to the STT 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	<ul style="list-style-type: none"> 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.
State, Tribal, or Territorial Government PA Damage Assessment Team Lead	<ul style="list-style-type: none"> 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, validating PA-related information submitted by local or county emergency managers, and serving as the primary state or Tribal Nation programmatic representative during the joint PDA. Responsible for representing the state or Tribal Nation as part of joint PDA field assessment team.

State, Tribal, or Territorial Roles	Responsibilities
	<ul style="list-style-type: none"> 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 Nation phases
State, Tribal, or Territorial Government Geospatial and Data Analysis Lead	<ul style="list-style-type: none"> Analyze, view and extract damage information from geospatial data. Use GIS to review location-based data collected by field staff, view imagery or virtually sensed data, and develop and run models to predict disaster impact. Use GIS to conduct geospatial statistical analyses and derive findings from correlating different data types. Use GIS to provide a high-level view of damaged structures.

541 **FEMA Roles and Responsibilities**

542 Programmatic team leads assigned to oversee IA or PA program damage assessments
 543 report to the FEMA PDA coordinator and coordinate with the regional IA branch chief or
 544 regional PA branch chief (as needed) to ensure programmatic requirements are considered
 545 throughout the joint PDA. The PDA coordinator is a regional role that oversees recovery
 546 program teams conducting IA and PA PDAs in the field. The PDA team leads report to the
 547 PDA coordinator and support the PDA coordinator’s span of control by overseeing PDA team
 548 members, per NIMS guidelines.

549 When an IA joint PDA or a PA joint PDA are requested, the FEMA Regional Recovery Division
 550 Director, IA branch chief, or PA branch chief identify a PDA coordinator and an IA PDA team
 551 lead and/or PA PDA team lead. PDA team leads are typically senior program specialists or
 552 specialists with considerable experience conducting PDAs. As a best practice while
 553 conducting PDAs, the FEMA PDA team lead acts as a senior observer, serves as a subject-
 554 matter expert (SME) on eligibility issues, and collects the information FEMA needs to
 555 continue the PDA process. The basic structure of a PDA team is outlined in Figure 6.

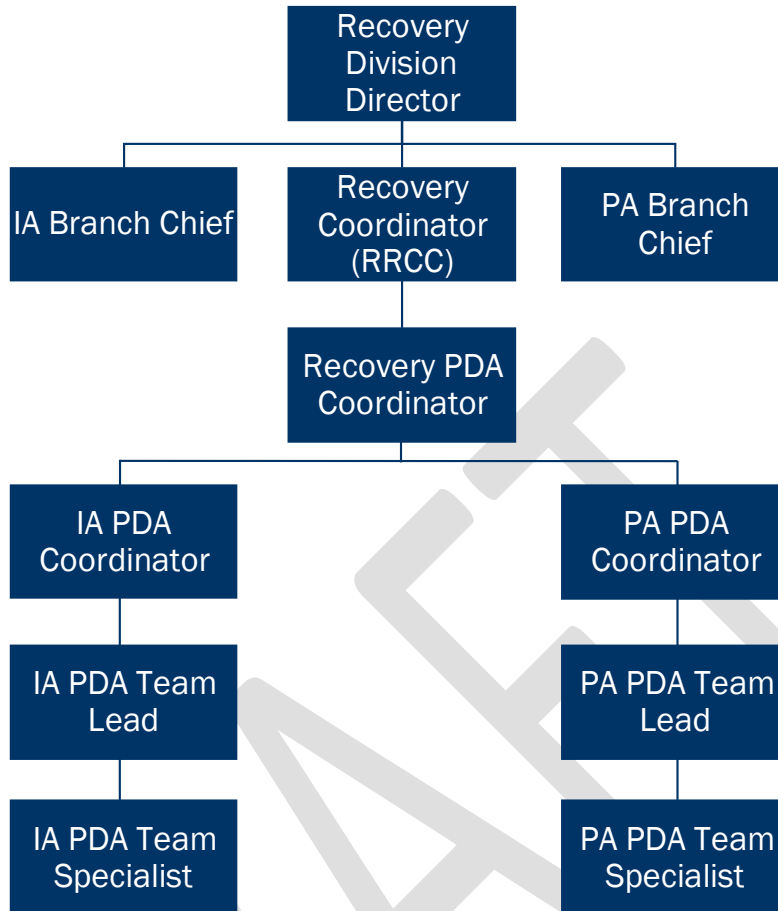


Figure 6. PDA Team Structure

556

557

558 The region coordinates deployments of PDA team leads and team members in coordination
 559 with the PDA coordinator. The PDA team lead or PDA coordinator uses the Deployment
 560 Tracking System (DTS) to assemble, manage, and deploy PDA team members. DTS allows
 561 the PDA team lead to track PDA team members assigned a PDA Ancillary Support (AS) title
 562 and ensure all team members have completed the minimum training requirements
 563 necessary to support a joint PDA. Training requirements vary by region. At a minimum PDA
 564 team members are required to complete training on the PDA process and conducting site
 565 inspections and have qualified experience in the IA, PA, or Hazard Mitigation programs.

566 When a joint PDA is requested by a federally recognized Tribal Nation, close coordination
 567 with a FEMA Regional tribal liaison is also required to support culturally appropriate
 568 communication with Tribal Nation leaders and members. This includes providing tribe-
 569 specific cultural awareness training to PDA team members prior to their deployment in the
 570 field environment. See Appendix D: Tribal-Specific Considerations for more information on
 571 the programmatic differences that might be highlighted during a PDA for Tribal Nations.

572 Table 7 outlines general roles and responsibilities for members who may be part of the
 573 FEMA damage assessment team dependent on the situation. Table 9 in Chapter 4 and Table

574 11 in Chapter 5 outline additional programmatic roles and responsibilities for FEMA staff
 575 supporting IA joint PDAs and PA joint PDAs.

576 **Table 7. FEMA PDA Team Roles and Responsibilities**

FEMA Damage Assessment Team Roles	Responsibilities
FEMA Headquarters (HQ) Preliminary Damage Assessment (PDA) Unit	<ul style="list-style-type: none"> • Supports state, local, tribal, and territorial (SLTT) governments and the regions with technology and training needs. • Advises on policy through coordination with the Individual Assistance (IA) and Public Assistance (PA) branches. • Supports the regions and SLTT stakeholders with policy and technical assistance.
FEMA PDA Team Lead	<ul style="list-style-type: none"> • Responsible for collecting, aggregating, and archiving joint PDA data from field team members, as well as formulating narratives and tables used to document validated damage. • Responsible for overseeing PDA team members.
FEMA PDA Team Member	<ul style="list-style-type: none"> • Facilitates the exchange of information with local officials to ensure an accurate and efficient collection of damage and impact information.
FEMA Mitigation Point of Contact or Specialist	<ul style="list-style-type: none"> • 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 Nation-wide basis. • Responsible for collecting and compiling relevant mitigation data and information for inclusion in the hazard mitigation PDA narrative. • Provides information related to PA Hazard Mitigation in the event of disaster declaration.
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> • Provides information related to environmental and historic preservation regulatory and Environmental Justice program requirements. • Responsible for identifying potential impacts to natural, historic, and cultural resources and for prioritizing available resources to protect these assets. • Responsible for collecting and compiling relevant environmental and historic preservation data and information for inclusion in the PDA narrative. • Facilitates communications with federal and state resource and regulatory agencies to address real-time emergency work with potential to impacts to natural, historic, and cultural resources. • Provides information related to resilience opportunities in the event of disaster declaration.
FEMA External Affairs Media Relations Specialist	<ul style="list-style-type: none"> • Serves as FEMA's representative to the media for matters related to the joint PDA. • Provides intergovernmental affairs support as a liaison between FEMA programmatic specialists and Tribal Nations via regional tribal affairs advisors.
FEMA Community Assistance Coordinator or Specialist	<ul style="list-style-type: none"> • Provides recovery support through early integration of community impact information into the PDA and collects community impact information from the PDA to inform early event Community Assistance assessments. • Provides an opportunity for early integration and coordination with RSFs/OFAs.

FEMA Damage Assessment Team Roles	Responsibilities
FEMA Civil Rights Advisors	<ul style="list-style-type: none"> • Advise the team on providing reasonable modifications to disaster survivors with disabilities. Reasonable modifications may include offering damage assessment forms in Braille, large print, or electronic formats; or providing sign language interpreters during inspections. • Advise the team on providing language access services during inspections including translating vital documents (e.g., damage assessment forms) if the disaster survivor’s primary language is not English; and providing an interpreter to achieve effective communication between the inspector and the disaster survivor whose primary language is not English. • Receive and process informal complaints from disaster survivors alleging discrimination based on race, color, religion, nationality, sex, age, disability, English proficiency, or economic status.

577 **FEMA Regional Office**

578 The FEMA regional office provides support throughout the joint PDA process. After the joint
579 PDA data is collected, FEMA regional office staff validate the data and any Presidential
580 disaster declaration requests. The FEMA regional office makes recommendations based on
581 the validated PDA information submitted by STT governments to FEMA HQ for consideration.

582 The RA and RRDD has a delegation of authority to appoint anyone they deem fit into the
583 coordinator and team lead roles The FEMA PDA coordinator is a regional asset that reports
584 to the FEMA Regional Recovery Division Director. The PDA coordinator oversees recovery
585 program teams conducting IA and PA PDAs in the field. The responsibilities outlined in Table
586 8 clarify the role of FEMA Regional office staff.

587 **Table 8. FEMA Regional Office Team Member Roles and Responsibilities**

FEMA Region Roles	Responsibilities
FEMA Regional Administrator	<ul style="list-style-type: none"> • 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 STT government for disaster declarations; overseeing the development of analysis; and making a recommendation based on information provided in the Regional Administrator’s Validation and Recommendation (RVAR). • Responsible for determining and requesting staffing, financial, and material resource requirements for deployments and for conducting PDAs, where feasible and necessary. • Responsible for supervising the feasibility, scheduling, and time requirements for conducting pre-declaration and PDA activities.

FEMA Region Roles	Responsibilities
FEMA Regional Recovery Division Director or Regional Response Division Director	<ul style="list-style-type: none"> Oversees the deployment of Regional Division staff required to support STT government requests for joint preliminary damage assessments (PDA) and ensuring necessary programmatic information is available during the development of the RVAR. Responsible for providing direction and oversight for components of FEMA's Recovery Division, including programmatic and technical assistance provided within the region in all phases of the damage assessment process.
FEMA Mitigation Division Director, Deputy Division Director, or Delegated Representative	<ul style="list-style-type: none"> 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).
FEMA PDA Coordinator	<ul style="list-style-type: none"> 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 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. Responsible for overseeing PDA team leads and any supporting PDA team members.
IA Regional Branch Chief	<ul style="list-style-type: none"> 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 PDA process, including coordination with the state, Tribal Nation, or territorial government program leads; mobilization of staff and assets; coordination with Other Federal Agencies (OFA) and Recovery Support Functions (RSF), and providing programmatic input for the Regional Administrator's Validation and Recommendation (RVAR). Coordinates with the PDA coordinator to support the IA PDA team lead and other IA PDA specialists conducting the joint PDA in the field.
PA Regional Branch Chief	<ul style="list-style-type: none"> Provides direction and oversight of the Public Assistance (PA) program. Responsible for overseeing the coordination of all actions required of the branch throughout the damage assessment process, including coordination with the state or Tribal Nation program leads, mobilization of staff and assets, coordination with Other Federal Agencies (OFA) or Recovery Support Functions (RSF), and providing programmatic input for the RVAR. Coordinates with the PDA coordinator to support the PA PDA team lead and other PA PDA specialists conducting the joint PDA in the field.

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CHAPTER 3: JOINT PDA METHODOLOGIES

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Chapter 3 outlines damage assessment methodologies that can be used for both IA and PA joint PDAs. This includes an overview of major methodologies including self-reporting, door-to-door assessments, windshield surveys, virtual sensing tools, and desktop assessments.

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Overview

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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 differences 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 and supporting documentation.

Respecting Tribal Privacy

FEMA will work closely with Tribal Nations to determine the best PDA approach that respects the privacy of the Tribal Nation and the Tribal Nation's spiritual and cultural sites. For additional information, refer to the guidelines outlined in the 2023 Recovery Program Enhancements to Support Tribal Nations.

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The PDA coordinator, in coordination with the STT government, should choose a damage assessment methodology or methodologies based on information collection and validation requirements. Different incidents may require different approaches and timelines. Multiple methodologies may be used concurrently during the joint PDA process.

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When conducting assessments, joint PDA teams should document the direct and indirect consequences that damaged and destroyed infrastructure has on the community. Damage descriptions are developed by the PDA team in the field and should be as thorough and comprehensive as possible given time constraints to ensure the scope of the damage is correctly documented and communicated. While disasters like fires, tornadoes, and hurricanes often produce readily visible damage that can quickly be assessed using windshield assessments, flyovers, or geospatial analysis, other disasters like flooding or earthquakes may require more time and resource-intensive door-to-door assessments.

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Self-Reporting

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Self-reporting individual assessment methods are often employed by local, county, state, Tribal Nation, or territorial emergency managers to quickly develop initial damage information. They are encouraged to employ self-reporting, as it allows the STT government to more easily review damage and the joint PDA team to more easily validate damage. Joint PDA 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 or site's damage level to reduce the time required to validate information.

623 Door-to-Door Assessments

624 Door-to-door assessments are commonly
625 used during smaller incidents, when
626 damage cannot be otherwise validated,
627 or for validating damage from a PDA
628 under appeal. Joint PDA teams
629 conducting door-to-door assessments
630 should take photographs of damage used
631 to assess a home or site to reduce the
632 time required to validate information.
633 Teams should only employ the door-to-
634 door assessment method if other
635 methods are insufficient. Teams should
636 also only enter dwellings with the
637 permission of the occupant and after
638 safety considerations are evaluated by
639 the team.

640 Digital Surveys

641 Field team members can use digital
642 applications to replace paper street
643 sheets. This includes the IA survey, which
644 is used for single family homes and multi-family residences, and the PA survey, which is
645 used to document estimated costs. Collecting PDA data digitally allows for the instant
646 transfer of data to the server when the user has access to a data connection. If no data
647 connection is available, data can still be collected digitally offline and saved to an outbox.

648 Validation Tools

649 Field team members may also use mobile applications, such as Field Maps, to validate IDA
650 data that has already been collected by the STT government directly from a mobile device
651 without having to re-enter the data. An IDA dataset from the STT is uploaded into the
652 software for validation. The dataset can also be exported from the STT's GIS system as
653 either an Excel file or a Geospatial Database file.

654 Site Assessments

655 Joint PDAs for PA are typically conducted through in-person site assessments because PA
656 damage assessments require a considerable amount of site-level information. The teams
657 conducting site assessments should take relevant photographs of damage to support
658 restoration work and cost estimates. The PDA team may also use drawings to report the

Urban Search and Rescue Rapid Assessments

Safety is the primary mission of Urban Search and Rescue (US&R) field teams, but teams already on the ground can provide rapid assessments of damage to homes and infrastructure when not conducting life-saving activities. Since first responders are often the first to complete a field assessment on structures, this information, as it becomes available, can be integrated into the wider IDA and PDA process.

- US&R Task Forces will only operate in areas that the SLTT has requested to be searched or assessed.
- A US&R Rapid Damage Assessment may only include a damage level and sometimes, but not always, a photo.
- This Rapid Damage Assessment data can often be found in Incident Action Plans and Operational Action Plans available upon request from the Emergency Support Function #9 desk.

659 dimensions and damage to support the work and cost estimates. When local governments
660 and Tribal Nations conduct thorough IDAs with photographs and supporting documentation,
661 joint PDA teams may choose to validate smaller damages through desktop validation. Site
662 assessment should still be conducted for large projects, prioritizing the largest, and for
663 projects with the potential for natural and cultural resource significance and/or impact.

664 Site assessments may include in-person visits to the damaged facility and interviews with
665 representatives from Applicants who may have already completed the work (e.g., emergency
666 protective measures or debris removal). When feasible, local and Tribal Nation emergency
667 management officials can work with the joint PDA team to arrange group meetings with
668 Applicants. In these meetings, FEMA and STT government officials can explain the federal
669 disaster assistance process, the needs of the PDA, and the PA program categories of work.
670 Once each category of work is explained, officials can ask if there is additional information
671 that the local jurisdiction wishes to include. This is a forum for local emergency managers or
672 Applicants to describe the impacts they would face (e.g., financial impacts, community
673 improvement delays, employee layoffs, or hiring delays) if a Presidential disaster declaration
674 was not granted. When necessary, the joint PDA team can then call for individual interviews
675 to obtain a better sense of each Applicant's project, work, or damage impacts. The
676 Applicant's final PDA cost estimate cannot be reached until the appropriate information,
677 data, and documentation is provided and program staff can validate the eligibility of the
678 Applicant, facility, work, and cost FEMA must also validate OFA authorities and insurance
679 coverage, including requirements to obtain and maintain insurance, to not duplicate
680 benefits. For a list of the documentation requirements, refer to Appendix I, and for additional
681 information on factors that impact the site assessment, refer to the PAPPG.

682 **Windshield Surveys**

683 To conduct windshield surveys, assessment teams record observed damage while driving
684 through impacted areas to quickly assess debris removal needs. If possible, teams may stop
685 to conduct interviews to provide anecdotal evidence related to insurance coverage,
686 occupancy type (owner or renter), general basement construction, and other significant
687 information to support census information collected to develop impact statements.
688 Assessment teams conducting windshield surveys should take relevant photographs of
689 damage used to document a home as affected, minor, major, or destroyed to reduce the
690 time required to validate information. This process is repeated street by street for the team's
691 assigned area.

692 Representatives from FEMA, the SBA, and the SLTT government should always ride together
693 in the same vehicle because multiple vehicles can be intrusive and intimidating for disaster
694 survivors. Additionally, using a single vehicle facilitates discussion amongst assessment
695 team members. However, the regional Safety Officer may provide different, incident-specific
696 guidance.

697 Field team members may also use mobile applications that allow them to quickly record field
698 observations from a moving car, truck, or helicopter. These applications can be used for
699 aerial assessments, site inspections, debris assessments, and windshield assessments.

700 Virtual Sensing

701 Virtual sensing, which includes obtaining aerial imagery from flyovers, is a way to rapidly
702 collect information about structures that sustained damage. Aerial imagery may be collected
703 with helicopters, fixed-wing aircraft, or drones. High-resolution satellite imagery may also be
704 available through the FEMA HQ Remote Sensing Office. Regular full-color imagery can show
705 whether a structure has been damaged. Other technologies, such as light detection and
706 ranging (LiDAR), synthetic aperture radar (SAR), or multispectral imagery (typically airborne)
707 may provide additional details about the nature of damage. This data may be loaded into a
708 web viewer for easy access. Advanced analytics could be used to automatically identify and
709 categorize damaged structures from imagery.

710 Imagery collected through virtual sensing can be used to identify damaged homes and
711 infrastructure and determine the extent of damage. A geospatial or virtual-sensing specialist
712 should determine and request the most appropriate data for the event. Common data types
713 and the aircraft or systems needed to collect data include:

- 714 • High resolution orthorectified satellite imagery (20-inch or 0.41-meter pixel
715 resolution, if possible).
- 716 • High resolution orthorectified airborne imagery (10-inch pixel resolution or better).
717 This imagery should be acquired at an overhead/nadir angle. For best results, 6-inch
718 oblique imagery should be acquired.
- 719 • SAR or LiDAR sensors: used for mapping flooding extents and change detection on
720 land.
- 721 • Civil Air Patrol (CAP) photographs: Geo-tagged photographs collected through mission
722 assignment that are most often simple airborne collected images that are not
723 orthorectified and can also include ground-collected photographs.
- 724 • Traditional media: Photographs or news footage can be geo-located in order to
725 determine locations of damaged houses.
- 726 • Social media: Geo-tagged photographs or videos posted to social media sites.

727 Limitations that can affect timeliness and quality of virtually sensed data include:

- 728 • Weather,
- 729 • Flight prohibition,
- 730 • Poor data environments,
- 731 • Contract acquisition timeline, and
- 732 • The size of the impacted area.

733 **Geographic Information Systems**

734 Emergency Managers can use GIS datasets to analyze damage to homes and
735 neighborhoods and compare it with imagery before the disaster occurred. GIS allows an
736 analyst to view and extract information from geospatial data. GIS provides the following
737 capabilities to the emergency management community:

- 738 • View location-based data collected by field staff;
- 739 • View imagery or virtually sensed data;
- 740 • Develop and run models to predict disaster impact; and
- 741 • Identify options for resource allocation, temporary housing, and other post-incident
742 needs.

743 A geospatial analyst may also use licensed ArcGIS Pro to conduct geospatial statistical
744 analyses and derive findings from correlating different data types. For PDAs, GIS can provide
745 a high-level view of damaged structures.

746 **Modeling**

747 Modeling can be used to rapidly predict damage that is likely to be or likely to have been
748 caused by a disaster and can be used to leverage resources. For example, data from Flood
749 Modeling can be used to develop models that predict disaster impact. Common modeling
750 products used include hurricane prediction maps (wind speed, rainfall, and storm surge),
751 earthquake shake maps, tornado track maps, Hazards United States (HAZUS), and the
752 Prioritizing Operations Support Tool (POST). Flood Modeling Data from the National
753 Hurricane Center (NHC) can be used to make estimates on where water levels during a
754 flooding event.

755 ***HAZUS***

756 HAZUS contains models for estimating potential losses and physical and social impacts from
757 floods, earthquakes, hurricanes, and tsunamis. HAZUS is especially useful in approximating
758 the extent and location of damage in large events or hard-to-reach locations. HAZUS works
759 best in large scale incidents, as even limited teams may not be able to physically visit the
760 entire area. Potential loss estimates that can be analyzed in HAZUS include:

- 761 • Physical damage to residential and commercial buildings, schools, critical facilities,
762 and infrastructure;
- 763 • Economic loss including lost jobs, business interruptions, repair, and reconstruction
764 costs; and
- 765 • Social impacts including estimates of shelter requirements and displaced
766 households.

767 *Prioritizing Operations Support Tool*

768 POST helps FEMA allocate resources in a more equitable way by estimating the impact of a
769 hazard on a community by integrating hazard and vulnerability data within one square
770 kilometer or five square kilometers U.S. National Grid (USNG) cells. The result is weighted by
771 the number of residential parcels within a cell. A high score signifies a cell with a high
772 number of residential parcels that are most likely to be severely affected or damaged.

773 **Desktop Assessments**

774 Joint PDA teams must validate estimates with visual confirmation. Visual confirmation does
775 not necessarily need to be in person in certain circumstances. When local or Tribal Nations
776 officials have the capability and capacity to conduct onsite IDAs—and can submit the
777 required information, data, documentation, and photographs demonstrating impact and
778 eligibility directly to FEMA. FEMA can then validate potential projects virtually through
779 desktop assessments.

780 FEMA requires visual proof or proper documentation to validate damage. Common examples
781 include:

- 782 • Annotated maps;
- 783 • Photographs;
- 784 • Debris quantity calculation sheets;
- 785 • Brief statements of percentage of work completed at the time of assessment;
- 786 • Brief statements about whether work is force account, contract, or a combination
787 thereof;
- 788 • Labor cost summary;
- 789 • Labor contracts/agreements;
- 790 • Equipment cost summary;
- 791 • Supply cost summary;
- 792 • Insurance documents, and
- 793 • Contractor bids or invoices.

794 If a desktop assessment is used as a PDA methodology, process for joint PDAs will be
795 adjusted so that:

- 796 1. The STT works with local staff to validate IDA data by conducting in-person site
797 assessments.
- 798 2. The FEMA PDA coordinator will work with the STT PDA coordinator to develop rules of
799 engagement, determine how the PDA will proceed, ensure logistical requirements are
800 met, and establish a date for the pre-deployment briefing, if necessary.
- 801 3. The STT PDA coordinator develops a PDA plan of action that identifies PDA team
802 members; the local, Tribal Nation, or county assignments; and local or Tribal Nation
803 point of contact information; and organizes logistical requirements.

- 804 4. The STT PDA coordinator completes validation of PDAs before submitting to FEMA
805 and submits validated costs in real-time to the FEMA PDA coordinator.
- 806 5. The FEMA PDA team lead will review PDA information and assign to a PDA team
807 member and other staff, as needed.
- 808 6. FEMA PDA team members review information submitted for eligibility and reasonable
809 cost. Additionally, will notify other team members of potential challenges in their area
810 of support such as the Mitigation Branch, Environmental Planning and Historic
811 Preservation (EHP), and External Affairs.
- 812 7. If validation questions arise, FEMA PDA staff communicate concerns to the PDA
813 coordinator. The PDA coordinator contacts the STT PDA coordinators to agree on a
814 resolution to the questions. If a resolution cannot be reached, an onsite joint PDA
815 may be required.

DRAFT

816 CHAPTER 4: INDIVIDUAL ASSISTANCE JOINT 817 PRELIMINARY DAMAGE ASSESSMENTS

818 Chapter 4 outlines roles and responsibilities for IA joint PDAs and declaration factors for
819 evaluating requests for IA.

820 Overview

821 Once the STT government requests a joint PDA with FEMA, they will collaborate to develop a
822 plan of action utilizing PDA methodologies. After the joint PDA is executed, they estimate the
823 cost of assistance based on specific types of damage that pertain to each degree of damage
824 category, and each type of residential building. The STT government and FEMA also consider
825 insurance coverage, available resources (such as assistance programs or voluntary
826 organizations), and relevant impacts to critical community infrastructure.

827 FEMA IA programs provide financial and direct assistance to disaster survivors with disaster-
828 caused unmet needs. Support may include assistance for temporary housing and housing
829 repairs, critical disaster-related expenses, the replacement of essential personal property,
830 and funding to the STT government for IA program services. The joint PDA team in the field
831 does not make eligibility determinations while conducting the joint PDA. The PDA team only
832 captures damage that would meet the eligibility criteria outlined in the [IAPPG](#). Refer to the
833 IAPPG for detailed information on IA programs and to www.FEMA.gov/PDA for additional
834 resources for conducting a PDA.

835 For disaster declaration requests that include IA, STT governments must evaluate and
836 document specific information regarding the extent of damage to local jurisdictions. When
837 evaluating the need for IA, FEMA will consider the following six factors for states and
838 territories:

- 839 1. Uninsured home and personal property losses,
- 840 2. State or territory fiscal capacity and resource availability,
- 841 3. The demographics of the impacted population,
- 842 4. Impact to community infrastructure,
- 843 5. Casualties, and
- 844 6. Disaster-related unemployment.

845 Of these six factors, this chapter will focus on assessing the cost of assistance, assessing
846 available resources, and assessing impacts.

847 For Tribal Nations requesting their own disaster declarations, FEMA will consider the
848 following factors for IA that have been laid out in FEMA's Tribal Declarations Guidance:

- 849 1. Uninsured home and personal property losses,
- 850 2. Availability of housing resources,
- 851 3. Casualties,
- 852 4. Impact to community infrastructure,
- 853 5. Disaster-impacted population profile,
- 854 6. Voluntary agency and other assistance,
- 855 7. Tribal Nations resources,
- 856 8. How the Tribal Nations defines its community, as Tribal Nation responsibilities are
- 857 not limited to Tribal Nation lands; and
- 858 9. The unique conditions that may affect Tribal Nations.

859 To consider these factors, FEMA requires an assessment of home and personal property
860 losses and an impact statement that includes an analysis of available resources and other
861 variables.

862 The principal factors FEMA will consider in the evaluation of a major disaster declaration
863 request for IA include the estimated cost of assistance for uninsured homes and personal
864 property losses and resource capability and capacity of the requesting STT.

865 **IA Roles and Responsibilities**

866 Roles and responsibilities described in this section are intended to give SLTT government
867 and Federal Government emergency management officials the flexibility necessary to tailor
868 the PDA process to the appropriate resources, populations, and stakeholders while
869 maintaining standardization across the Nation.

870 **Local Government or Tribal Nations Roles and Responsibilities**

871 Local government or Tribal Nations are typically responsible for gathering information
872 related to the location, ownership, occupancy, and insurance coverage of impacted
873 residences and categorizing damage. For additional information on the roles and
874 responsibilities for local and Tribal Nation personnel, refer to Chapter 2.

875 **STT Government Roles and Responsibilities**

876 STT governments are typically responsible for working with local emergency managers to
877 assess whether the IDA information is complete and aligned with FEMA PDA standards. For
878 additional information on the roles and responsibilities for STT government personnel, refer
879 to Chapter 2.

880 **FEMA Roles and Responsibilities**

881 The FEMA PDA coordinator reports to the FEMA Regional Recovery Division Director, often
882 through the Regional IA Branch Chief. Programmatic team leads assigned to oversee IA
883 program assessments report to the FEMA PDA coordinator and maintain appropriate

884 coordination with the regional IA branch chief (as needed) to provide IA programmatic
 885 support throughout the joint PDA.

886 When an IA joint PDA is requested, the FEMA Regional Recovery Division Director or IA
 887 branch chief identifies an IA PDA team lead. IA PDA team leads are typically senior program
 888 specialists or specialists with considerable experience in conducting PDAs. When a joint PDA
 889 is requested by a federally recognized Tribal Nations, close coordination with a FEMA
 890 regional tribal liaison will also be required to support culturally appropriate communication
 891 with Tribal Nation leaders and members. The roles and responsibilities outlined in Table 9
 892 clarify the reporting relationships and responsibilities for FEMA staff as they relate to the IA
 893 PDA process. The PDA Team may not include every role listed in Table 9. Roles may be
 894 added or removed based on the magnitude of the incident.

895 **Table 9. FEMA IA PDA Team Member Roles and Responsibilities**

FEMA Damage Assessment Team Roles	Responsibilities
FEMA PDA Coordinator	<ul style="list-style-type: none"> 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. Designated by the programmatic branch chief or Recovery Director. May perform programmatic preliminary damage assessment (PDA) team functions simultaneously.
FEMA IA PDA Team Lead	<ul style="list-style-type: none"> May also function as an Individual Assistance (IA) 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 Nation-wide basis. Responsible for collecting and compiling relevant mitigation data and information for inclusion in the hazard mitigation PDA narrative.

FEMA Damage Assessment Team Roles	Responsibilities
FEMA External Affairs Media Relations Specialist	<ul style="list-style-type: none"> Serves as FEMA's representative to the media for matters related to the joint PDA. Provides intergovernmental affairs support as a liaison between FEMA programmatic specialists and Tribal Nations via regional tribal affairs advisors.
Civil Rights Advisor	<ul style="list-style-type: none"> Gathers statistics and data needed to develop a community analysis by coordinating with the GIS unit of the Planning section or downloading data provided by the U.S. Census Bureau, including the American Community Survey. Provides input in the planning, design, implementation, monitoring, and evaluation of disaster risk activities to provide better services to survivors by using information from the community analysis.
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> Ensures that environmental and historic preservation concerns identified during the joint PDA are understood and can be addressed at the appropriate level of government.
U.S. Small Business Administration PDA Coordinator	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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)	<ul style="list-style-type: none"> Provide information through coordination with the FEMA PDA coordinator or programmatic team lead to help develop efficient and effective damage and impact information.

896 **FEMA Regional Office**

897 The region provides oversight and direction to IA program branch chiefs and other staff
898 throughout the joint PDA process. During the assessment process, regional staff process
899 requests for disaster declarations and make determinations based on the IDA information
900 submitted by STT governments. Program specific responsibilities are outlined in Table 10.
901 For additional information on the roles and responsibilities for regional personnel, refer to
902 Chapter 2.

903 **Table 10. FEMA Regional Office Team Member Roles and Responsibilities**

FEMA Regional Office Role	Responsibilities
FEMA IA Regional Branch Chief	<ul style="list-style-type: none"> Responsible for providing direction and oversight of the Individual Assistance (IA) program.

FEMA Regional Office Role	Responsibilities
	<ul style="list-style-type: none"> Responsible for overseeing the coordination of all actions required of the IA Branch throughout the PDA process, including coordination with the state, Tribal Nation, or territorial government program leads; mobilization of staff and assets; coordination with Other Federal Agencies (OFA) and Recovery Support Functions (RSF), and providing programmatic input for the Regional Administrator's Validation and Recommendation (RVAR). Coordinates with the PDA coordinator to support the IA PDA team lead and other IA PDA specialists conducting the joint PDA in the field.
FEMA Voluntary Agency Liaison Crew Leader	<ul style="list-style-type: none"> 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.
Mass Care and Emergency Assistance Specialist	<ul style="list-style-type: none"> Documents activity and evaluates capacity of government agencies and NGO providing mass care/emergency assistance care and support. Responsible for coordinating with NGOs, including VOAD and/or COAD members in order to document activity and evaluate capacity of those organizations.

904 Damage Levels

905 Time and access constraints may limit
 906 what methods are available to assess
 907 damage to homes. When possible, every
 908 effort should be made to capture:

- 909 • Mapped location information,
 910 generally (e.g., jurisdictions
 911 impacted) and specifically (e.g.,
 912 physical addresses or GPS
 913 coordinates of damaged
 914 dwellings);
- 915 • The degree of damage;
- 916 • Incident or peril type (e.g., flood, wind, fire, etc.);
- 917 • Insurance for the peril type (e.g., flood, homeowners, etc.)
- 918 • The home type (e.g., manufactured or conventionally built, single-family residence,
 919 multi-family residence, etc.);
- 920 • Homes owned or rented by disaster survivors (tallied as a total percentage); and
- 921 • Primary or secondary residences (tallied as a total percentage).

922 To improve efficiency, FEMA has established four categories of damage that an impacted
 923 home may fall within: affected, minor, major, or destroyed. In many cases, the size and

Essential Living Spaces

Repairs are limited to restoration of the dwelling to a safe and sanitary living or functioning condition. Repair assistance will only be provided to the extent that the work makes the component functional. FEMA may provide for the replacement of components if repair is not feasible. The repairs of components must be of average quality, size, and capacity, taking into consideration the needs of the occupant.

924 needs of the unfolding disaster will not allow PDA teams to conduct a detailed review of
925 each home.

926 IA confirms that homes have sustained disaster-related damage by recording the damaged
927 components, such as damaged to the roof, walls, floors, and windows. On a basic level, joint
928 PDA teams should use the following standards for categorizing degrees of damage:

- 929 • Affected: Non-structural damage to a home that does not make the home unsafe to
930 enter or occupy.
- 931 • Minor: Repairable, non-structural damage to a home or damage from flood waters
932 when the waterline is 18 inches or below the floor level in a conventionally built
933 home or when the waterline is in the floor system of a manufactured home.
- 934 • Major: Structural damage or other significant damage that requires extensive repairs
935 or damage from flood waters when the waterline is 18 inches or above in a
936 conventionally built home or when the waterline enters the living space of a
937 manufactured home.
- 938 • Destroyed: Significant enough damage that the home is deemed a total loss.

939 For additional information on degrees of damage, refer to Appendix G and Appendix H.

940 When part of the home sustains disaster-caused damage, the functionality of that
941 component is also considered. For example, if a portion of the roof is damaged due to the
942 event and the roof is not repairable, the entire component must be replaced. IA assessors
943 will consider that the roof needs to be replaced as part of the damage assessment,
944 increasing the proposed damage level. However, the impact statement does not account for
945 damage to components during flooding or fire events. The assessment focuses on
946 determining the high-water level during floods, if the home was inundated with smoke, or if
947 the home was destroyed by the fire, rather than assessing component damage directly.

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

- 952 • The water level height in essential living spaces;
- 953 • If the waterline has reached electrical outlets;
- 954 • Duration of the flood;
- 955 • Contaminants in the water (e.g., sewage, oil, chemicals, etc.) which would require
956 special decontamination protocols above standard flood water cleaning procedures;
- 957 • Damage to or displacement from the foundation;
- 958 • Cosmetic damage, such as paint discoloration, loose siding, missing shingles or
959 siding, or damaged gutters; and

- 960 • Damage to mechanical components, such as the furnace, boiler, water heater, or
961 HVAC system.

962 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 validate because of disaster-related loss of access.

In the case of flooding incidents, floodwater or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence. In the case of non-flood incidents, debris or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.

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.

963 This section provides detailed information on the specific types of damage that pertain to
964 each degree of damage category. Not all details need to be validated to categorize a home's
965 degree of damage.

966 **Manufactured Homes**

967 Affected manufactured homes include
968 residences with only cosmetic damage,
969 damage to a retaining wall, or downed
970 trees that do not block access to the
971 residence. Cosmetic damage includes
972 minimal damage to skirting, paint,
973 gutters, or shingles. For flooding
974 incidents, the water level from flooding is
975 below the floor system (e.g., there is no
976 visible waterline, only skirting is missing
977 or bent).

Habitability

On March 22, 2024, FEMA simplified the regulatory definition of habitability to broaden eligibility, to include repairs to homes with preexisting conditions that are further damaged by disaster. Previously, FEMA defined:

- **Habitable:** Safe, sanitary, and functional.
- **Safe:** Secure from hazards or threats to occupants.
- **Sanitary:** Free of health hazards.

978 Manufactured homes with minor damage have sustained damage and require minimal
979 repairs. Residences in this category have no structural damage and have not been displaced
980 from their foundations. Table 11 describes the minor damage levels for flooding and non-
981 flood incidents.

982

Table 11. Minor Manufactured Homes Damage Levels

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> • 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). • There is no structural damage to the residence, and it has not been displaced from its foundation.
For non-flood incidents	<ul style="list-style-type: none"> • Some of the nonstructural components have sustained damage (e.g., damaged windows, doors, wall coverings, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC). • There is no structural damage to the residence, and it has not been displaced from its foundation.

983 Manufactured homes with major damage have sustained significant damage and require
 984 extensive repairs. Residences in this category have been displaced from their foundations,
 985 blocks, or piers and may also have damaged structural components. Table 12 describes the
 986 major damage levels for flooding and non-flood incidents.

987

Table 12. Major Manufactured Homes Damage Levels

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> • Water has covered the floor system and entered the living space of the residence, but the waterline is below six inches. • The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.
For non-flood incidents	<ul style="list-style-type: none"> • The majority of nonstructural components (e.g., roof, wall, and utilities) have sustained significant damage. • The roof damaged due to the disaster or due to pre-existing damage. • The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.

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

- 990 • The waterline is six feet or higher.
- 991 • The residence’s frame is bent, twisted, or otherwise compromised.
- 992 • Most of the structural framing of the roof or walls has been compromised, exposing
 993 the interior.

994 **Conventionally Built Homes and Multi-Family Homes**

995 Conventionally built homes and multi-family homes may be assessed for similar types of
 996 damage. The damage categories may be used to describe the entire structure of a multi-
 997 family home or to individual units. Damage may differ from unit to unit within a multi-family
 998 home.

999 Conventionally built homes that are affected have minimal cosmetic damage to their
 1000 exteriors and/or interiors. Table 13 describes the affected damage levels for flooding and
 1001 non-flood incidents.

1002 **Table 13. Affected Conventionally Built Homes and Multi-Family Homes Damage Levels**

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> • Mechanical components are not damaged or submerged. • Waterline of less than three inches in the lowest floor with essential living space.
For non-flood incidents	<ul style="list-style-type: none"> • The residence has cosmetic damage, such as paint discoloration or loose siding. • The residence has minimal missing shingles or siding. • Damage to gutters, retaining walls, or downed trees that do not affect access to the residence

1003 Conventionally built homes with minor damage have sustained a wide range of damage that
 1004 does not affect the structural integrity of the residence. Table 14 describes the minor
 1005 damage levels for flooding and non-flood incidents.

1006 **Table 14. Minor Conventionally Built Homes and Multi-Family Homes Damage Levels**

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> • Waterline between three inches and two feet in the lowest floor with essential living space. • Damage or disaster-related contamination to a private well or septic system.
For non-flood incidents	<ul style="list-style-type: none"> • 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, heating, ventilating, and air conditioning [HVAC], etc.). • Damage or disaster-related contamination to a private well or septic system.

1007 When the waterline exceeds three inches, but is below two feet, damage may be recorded
 1008 as major, depending on extenuating conditions, including:

- 1009 • Duration of the flood;
- 1010 • Contaminants in the water;
- 1011 • Waterline reached electrical outlets or essential heating, ventilating, and air
 1012 conditioning (HVAC) or water systems; or
- 1013 • Waterline in basement damages mechanical components (e.g., furnace, boiler, water
 1014 heater, HVAC, etc.).

1015 Conventionally built homes with major damage have sustained significant structural damage
 1016 and require extensive repairs. Table 15 describes the major damage levels for flooding and
 1017 non-flood incidents.

1018

Table 15. Major Conventionally Built Homes and Multi-Family Homes Damage Levels

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> • Waterline between two feet and six feet. • Waterline on the first floor (regardless of depth) if the basement is completely submerged
For non-flood incidents	<ul style="list-style-type: none"> • 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, and shifting of the residence from its foundation.

1019 Conventionally built homes that are destroyed are total losses (i.e., the damage is so severe
 1020 that the home cannot be repaired and/or requires demolition). One of the following factors
 1021 may constitute a status of destroyed, regardless of the cause of damage or disaster type:

- 1022 • There is complete failure of two or more major structural components (e.g., collapse
 1023 of foundation, walls, or roof);
- 1024 • The waterline is at the six feet or higher;
- 1025 • Only the foundation remains; or
- 1026 • The residence is in imminent danger (e.g., impending landslide, mudslide, or
 1027 sinkhole).

1028 **Factors for Evaluating Requests for IA for States and** 1029 **Territories**

1030 Following the joint PDA, the state, Tribal Nation, or territory government may choose to
 1031 submit an IA disaster declaration request. FEMA evaluates the request based on six
 1032 declaration factors. These factors allow FEMA to assess the cost of assistance, assess
 1033 available resources, and assess impacts. FEMA evaluates the information in the disaster
 1034 request to include, but not limited to, projected costs of assistance, available resources, and
 1035 the total impacts of the disaster.

1036 For more information on the factors FEMA uses to review tribal Presidential disaster
 1037 declaration requests, see [Appendix D: Tribal-Specific Considerations](#).

1038 **Assessing Cost of Assistance**

1039 The cost of assistance estimate is established by assessing and categorizing the degree of
 1040 damage of disaster-impacted residences. This calculation is data driven, calculated with
 1041 FEMA support, and is a combination of the two principal declaration factors. FEMA uses the
 1042 PDA data to make informed and data driven decisions while projecting the cost of
 1043 assistance. FEMA evaluates PDA data, including the number of damaged homes, the degree
 1044 of damage, the rate of home ownership, the cause of damage, and insurance coverage.

1045 Refer to the [Individual Assistance Declarations Factors Policy](#) for additional information on
1046 the cost of assistance calculation. State and Tribal Nations are responsible for the impact
1047 statement for the Presidential disaster declaration request package which includes an
1048 assessment of SLTT government capacity and resources and an assessment of the impacts
1049 of the disaster on the community.

1050 *Insurance Coverage*

1051 Capturing an accurate picture of the
1052 number of insured and uninsured homes
1053 is critical to the damage assessment
1054 process. Large numbers of damaged
1055 uninsured homes applicable to the peril
1056 may suggest a greater need for
1057 supplemental federal assistance. Generally, this information is developed from the best
1058 available resources, which may be in conjunction with state insurance commissions or
1059 through other avenues. FEMA may also use general homeowner insurance percentages as
1060 the basis for evaluating insurance coverage in a community. This data improves consistency
1061 in determining homeowners' insurance and can be used in the Individuals and Housing
1062 Program (IHP) cost estimate when making the programmatic recommendation on a
1063 declaration request.⁷

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.

1064 To protect the Personally Identifiable Information (PII) of impacted individuals and the
1065 proprietary information held by the insurance industry, insurance information is typically
1066 aggregated at the county, census block, or ZIP Code level. Insurance information should
1067 always be evaluated at the lowest level possible based on the data available.

1068 To estimate the level of applicable insurance coverage, STTs should work with local
1069 governments to validate information related to insurance coverage and occupancy status
1070 (primary residence, secondary residence, and vacant property). Insurance types that may
1071 cover disaster-related perils include the following:

- 1072 • Homeowners insurance,
- 1073 • Condominium insurance,
- 1074 • Insurance for manufactured homes,
- 1075 • Renters insurance,
- 1076 • Flood insurance,
- 1077 • Sewer backup rider,
- 1078 • Earthquake rider,
- 1079 • Landslide rider,
- 1080 • Subsidence rider,

⁷ For additional information, please refer to Memorandum: Insurance Data for Joint Preliminary Damage Assessments.

- 1081 • Tornado rider,
- 1082 • Structural-only insurance,
- 1083 • Fire-only insurance, and
- 1084 • Contents-only insurance.

1085 Disaster survivors in a special flood hazard area (SFHA) that have previously received
1086 assistance and have not maintained their required flood insurance are ineligible for flood-
1087 insurable real and personal property assistance from FEMA in future flooding disasters,
1088 except for non-insurable losses, such as private bridges, wells, and septic systems.

1089 **Assessing Available Resources**

1090 In addition to assessing the cost of assistance for uninsured homes and personal property
1091 losses, STT governments must also assess several other factors that will be incorporated
1092 into the Presidential disaster declaration request.

1093 Federal disaster assistance under the Stafford Act is intended to be supplemental in nature
1094 and is not a replacement for emergency relief programs, services, and funds provided by
1095 SLTT governments, NGOs, or the private sector. FEMA will evaluate the availability of
1096 resources and, where appropriate, all extraordinary circumstances that contributed to the
1097 absence of sufficient resources.

1098 PDA teams may be asked to collect other information that is necessary to formulate a
1099 request and subsequent FEMA evaluation of a request, but it is not the primary purpose of
1100 the PDA. This includes STT government assistance programs and assistance from voluntary
1101 organizations.

1102 **Assessing Impacts**

1103 There is no set number of damaged homes
1104 that will automatically trigger a Presidential
1105 disaster declaration for an STT. Each
1106 disaster must be evaluated individually on
1107 the impacts that have overwhelmed the
1108 capacity and resources of the STT
1109 government. During the PDA process, STT
1110 governments should consider all factors that FEMA uses to evaluate a disaster request and
1111 write a compelling impact statement to demonstrate how the impacts of the disaster have
1112 overwhelmed the capacity and resources of the impacted governments.

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. For additional information on assistance, refer to the IAPPG.

1113 **Documenting Relevant Impacts**

1114 STT governments should validate the cause of damage, such as earthquakes, fires, flooding
1115 (including mudslides), hurricanes or typhoons, landslides, severe storms, sewer backups,

1116 utility outages and impacts, straight-line winds/derechos, tornados, tsunamis, terrorism, and
1117 volcanic eruptions.

1118 The concentration of damage to communities is considered when evaluating requests for
1119 the FEMA IA program. High concentrations of damage may indicate a greater need for
1120 federal assistance in some areas. However, FEMA also recognizes that widespread damage
1121 throughout a large area may come with its own challenges that can also be difficult for an
1122 STT government to manage.

1123 Beyond the cause of damage and concentration of damage, the joint PDA team will capture
1124 information on:

- 1125 • Disaster-impacted population profile,
- 1126 • Impacts to community infrastructure,
- 1127 • Disaster-related deaths and injuries,
- 1128 • Emergency sheltering information,
- 1129 • Feeding operations information,
- 1130 • Information related to distribution of emergency supplies,
- 1131 • Individual client assistance (client casework) information,
- 1132 • Information referral services, and
- 1133 • Unique conditions that affect Tribal Nations.

1134 *Impact Statements*

1135 When FEMA reviews a governor's request for a major disaster declaration authorizing IA,
1136 FEMA considers six factors to measure the severity, magnitude and impact of the incident.
1137 FEMA recommends that a governor or Tribal Chief Executive include information specifically
1138 addressing these factors in a declaration request. The impact statement narrative should
1139 expand on the data documenting the six factors and highlight considerations related to a
1140 community's ability to recover from a disaster. This can include a focus on recovery
1141 challenges, indicators of a prolonged recovery period, and trauma experienced by the
1142 impacted population.

1143 Impact statements help illustrate whether the disaster is beyond the capacity of the
1144 impacted jurisdiction and if supplemental federal assistance is required to recover. Impact
1145 statements for IA requests should include the following basic components:

- 1146 • An outline of the incident, including whether it was human-caused or natural, the
1147 time of occurrence, and the location;
- 1148 • State fiscal capacity to recover and resource availability;
- 1149 • Disaster history within the last 24-month period, particularly those occurring within
1150 the current fiscal cycle;
- 1151 • Uninsured home and personal property losses;
- 1152 • Disaster impacted population profile;

- 1153 • Impact to community infrastructure;
- 1154 • Casualties;
- 1155 • Disaster related unemployment; and
- 1156 • Numbers or statistics that lend context to the incident.

DRAFT

1157 CHAPTER 5: PUBLIC ASSISTANCE JOINT 1158 PRELIMINARY DAMAGE ASSESSMENTS

1159 Chapter 5 outlines roles and responsibilities for PA, joint PDAs and factors for evaluating
1160 request for PA.

1161 Overview

1162 FEMA's PA program aids SLTT governments and certain types of PNP organizations so that
1163 communities can quickly respond to and recover from major disasters or emergencies
1164 declared by the President. Through the PA program, FEMA provides supplemental federal
1165 disaster grant assistance for debris removal, emergency protective measures, and the
1166 restoration of disaster-damaged, publicly owned facilities and specific facilities of certain
1167 PNP organizations. The PA program also encourages protection of these damaged facilities
1168 from future incidents by assisting with hazard mitigation measures.

1169 FEMA uses PDA information to evaluate the need for assistance under the PA Program.
1170 Inclusion in the PA PDA is based on the likely eligibility of grant assistance following the
1171 disaster declaration. The PDA team does not make eligibility determinations while
1172 conducting the PDA but captures damage and costs that meet the eligibility criteria outlined
1173 in the PAPPG when validating damages and costs claimed during joint PDAs. Refer to the
1174 PAPPG for detailed information on PA programs and www.FEMA.gov/PDA for additional
1175 resources for conducting a PDA.

1176 Once the STT government requests a joint PDA with FEMA, both will collaborate to develop a
1177 plan of action utilizing one or multiple PA-specific PDA methodologies. The PDA plan
1178 provides detailed information on estimating cost of assistance, considers active insurance
1179 coverage, Hazard Mitigation projects, EHP requirements, and other federal agency
1180 programs.

1181 PA Roles and Responsibilities

1182 Roles and responsibility descriptions in this section are intended to give SLTT governments
1183 and the Federal Government emergency management officials the flexibility necessary to
1184 tailor the damage assessment process to resources, threats, populations, and stakeholders
1185 while maintaining standardization across the nation.

1186 FEMA Roles and Responsibilities

1187 The FEMA PDA coordinator reports to the FEMA Regional Recovery Division Director, often
1188 through the regional PA branch chief. Programmatic team leads assigned to oversee PA
1189 program assessments report to the FEMA PDA coordinator and maintain appropriate

1190 coordination with the regional PA branch chief (as needed) to provide PA programmatic
 1191 support throughout the joint PDA.

1192 When a PA joint PDA is requested, the FEMA Regional Recovery Division Director or PA
 1193 branch chief identifies a PDA coordinator to oversee the PA joint PDA. The PDA coordinator is
 1194 typically senior program specialists or specialists with considerable experience in conducting
 1195 PDAs. When a joint PDA is requested by a federally recognized Tribal Nations, close
 1196 coordination with a FEMA Regional tribal liaison will also be required to support culturally
 1197 appropriate communication with Tribal Nation leaders and members. This includes providing
 1198 tribe-specific cultural awareness training to PDA team members prior to their deployment in
 1199 the field environment. Table 16 clarifies the reporting relationships and responsibilities for
 1200 FEMA staff as they relate to the PA PDA process. The PDA team may not include every role
 1201 listed in Table 16. Roles may be added or removed based on the magnitude of the incident.

Table 16. FEMA PA PDA Team Member Roles and Responsibilities

FEMA Damage Assessment Team Roles	Responsibilities
FEMA PDA Coordinator	<ul style="list-style-type: none"> • 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 Regional Recovery Division Director. May perform programmatic preliminary damage assessment (PDA) team functions simultaneously. • Serves as a subject matter expert (SME) and addresses complex eligibility questions presented by the FEMA Public Assistance (PA) PDA teams. • Explains PA Policy (DRRA 1206) that can provide communities with the resources needed to effectively administer and enforce state and locally adopted building codes and floodplain management ordinances for a period of no longer than 180 days after the date of the major disaster declaration.
FEMA PA PDA Team Lead	<ul style="list-style-type: none"> • 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 Nation counterpart (state or tribal PA PDA team lead) and for the efficient and accurate assessment of program-related damage throughout the affected areas. • Serves as the field-level SME and addresses 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 Damage Assessment Team Roles	Responsibilities
FEMA PA PDA Team Member	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 Nation-wide basis. Responsible for collecting and compiling relevant mitigation data and information for inclusion in the hazard mitigation PDA narrative. Provides information related to PA Hazard Mitigation in the event of disaster declaration.
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> Provides information related to environmental and historic preservation regulatory and Environmental Justice program requirements. Responsible for identifying potential impacts to natural, historic, and cultural resources and for prioritizing available resources to protect these assets. Responsible for collecting and compiling relevant environmental and historic preservation data and information for inclusion in the PDA narrative. Facilitates communications with federal and state resource and regulatory agencies to address real-time emergency work with potential to impacts to natural, historic, and cultural resources. Provides information related to resilience opportunities in the event of disaster declaration.
FEMA External Affairs Media Relations Specialist	<ul style="list-style-type: none"> Serves as FEMA’s representative to the media for matters related to the joint PDA. When one or more Tribal Nations are involved in the joint PDA process, a FEMA regional tribal liaison may support culturally appropriate communications with Tribal Nation leaders and members, including coordinating with the Tribal Nation to develop and deliver cultural awareness training to FEMA staff. Develops congressional notices for impacted districts where joint PDAs will be conducted prior to the joint PDA.
Other Federal Agencies (OFA)	<ul style="list-style-type: none"> Provides information through coordination with the FEMA PDA coordinator or programmatic team lead to help develop efficient and effective damage and impact information.

1203 **FEMA Regional Office**

1204 The FEMA Regional office provides oversight and direction to PA program branch chiefs and
1205 other staff throughout the joint PDA process. During the assessment process, FEMA
1206 Regional office staff make determinations on eligibility for federal disaster assistance based
1207 on the IDA information submitted by STT governments. Program specific responsibilities are

1208 outlined in Table 17. For additional information on the roles and responsibilities for regional
 1209 personnel, please refer to Chapter 2.

1210 **Table 17. FEMA Regional Office Team Member Roles and Responsibilities**

FEMA Regional Office Roles	Responsibilities
FEMA Regional PA Branch Chief	<ul style="list-style-type: none"> • Provides direction and oversight of the Public Assistance (PA) program. • Responsible for overseeing the coordination of all actions required of the branch throughout the damage assessment process, including coordination with the state or Tribal Nation program leads, mobilization of staff and assets, coordination with Other Federal Agencies (OFA) or Recovery Support Functions (RSF), and providing programmatic input for the RVAR. • Coordinates with the PDA coordinator to support the PA PDA team lead and other PA PDA specialists conducting the joint PDA in the field.
FEMA Regional Environmental Officer	<ul style="list-style-type: none"> • Provide direction and oversight of FEMA's EHP regulatory compliance and integration of technical assistance throughout the damage assessment process. • Responsible for overseeing the coordination of EHP Specialists in identification and documenting of site-specific damage locations that may require detailed EHP review in accordance with federal environmental laws, regulations, and executive orders. • Collaborates with OFA and/or STT resource or regulatory agencies to identify potential environmental issues or historic preservation concerns that may impact joint PDA considerations. • Coordinates FEMA Regional PA Branch Chiefs on EHP concerns.

1211 **Impact Statements**

1212 Capturing the impact of damage is an essential PA programmatic assessment requirement.
 1213 Impact statements help illustrate whether the disaster is beyond the capacity of the
 1214 impacted jurisdiction and if supplemental federal assistance is required to recover. Impact
 1215 statements should include the following basic components:

- 1216 • An outline of the incident, including whether it was human-caused or natural, the
 1217 time of occurrence, and the location;
- 1218 • A description of the impacted population; and
- 1219 • Numbers or statistics that lend context to the incident.

1220 These statements, included in the governor's or TCE disaster declaration, are important
 1221 because the impact of a disaster will be considered, regardless of whether an STT
 1222 government meets the per capita cost indicators. These statements are also important for
 1223 giving context to potential damage that cannot be assessed at the time, like privately owned
 1224 bridges and/or roads. FEMA does not use a per capita indicator when evaluating a tribal
 1225 Presidential disaster declaration request. For more information on the factors FEMA uses to
 1226 review tribal Presidential disaster declaration requests for PA, see [Appendix D: Tribal-](#)
 1227 [Specific Considerations](#).

1228 At times there are extraordinary concentrations of damage that might warrant federal
1229 assistance even though the statewide per capita indicator is not met. This often occurs
1230 where critical facilities are involved or when the cost of restoring damaged infrastructure in
1231 a localized area is extremely high. Alternatively, federal assistance may not be warranted
1232 following a disaster, even though the statewide indicator is met. This occurs when the state
1233 or Tribal Nation can address the damage without supplemental federal assistance.

1234 **Factors for Evaluating Requests for PA**

1235 SLTT governments are encouraged to capture and document as many damage sites as
1236 possible during the IDA and submit damage eligible for PA before the joint PDA. Regional PA
1237 leadership will review the validated PDA information submitted by the SLTT government in
1238 order to make an eligibility determination and recommendation for federal disaster
1239 assistance.

1240 **Estimated Cost of Assistance**

1241 STTs are responsible for estimating their cost of assistance by assessing damage and
1242 estimating project costs. Counties, Tribal Nation lands, and parishes must each have
1243 estimates that reach a county and state per capita indicator to be considered a designated
1244 area/entity for PA. Per capita indicators are updated annually and can be found on the
1245 FEMA website. Indicators are not a requirement but are a baseline to measure against.
1246 Localized impacts that are so severe but do not meet an indicator may still be considered.
1247 Federally recognized Tribal Nations that are requesting their own Presidential disaster
1248 declaration do not need to meet a per capita indicator. For additional information about the
1249 factors FEMA uses to recommend approval for PA for Tribal Nations, see [Appendix D: Tribal-](#)
1250 [Specific Considerations.](#)

1251 **Identifying Applicants**

1252 Identifying Applicants is one of the first
1253 steps that SLTT governments must take to
1254 conduct damage assessments. Four types
1255 of Applicants are eligible for PA:

- 1256 1. State and territorial government
1257 agencies,
- 1258 2. Tribal Nations,
- 1259 3. Local governments, and
- 1260 4. Certain PNP organizations, as defined in 44 CFR Part 206.221 (e).⁸

Program Eligibility Considerations

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

- Applicant
- Facility
- Work
- Cost

⁸ 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

1261 *Identifying Damaged Facilities*

1262 FEMA will consider disaster-related damage to all buildings, works, systems, or equipment,
1263 built or manufactured, or an improved and maintained naturally occurring feature that an
1264 Applicant has legal responsibility to restore.

1265 The PDA provides information that allows FEMA to identify opportunities for hazard
1266 mitigation. Section 1206 of the Disaster Recovery Reform Act (DRRA) defines the framework
1267 and requirements for consistent and appropriate implementation of the PA Program, one of
1268 the PA declaration factors. This policy provides communities with the resources they need to
1269 effectively administer and enforce state and locally adopted building codes and floodplain
1270 management ordinances for a period of no longer than 180 days after the date of the major
1271 disaster declaration.

1272 *Documenting Damage*

1273 Once damage has been identified, Applicants should collect as much relevant information
1274 as possible. Applicants can refer to the [PA Initial Damage Assessment](#) for a list of
1275 information that can be included in the PA IDA. Applicants should document the work and
1276 estimate the actual cost required to perform emergency work or restore damaged
1277 infrastructure to pre-disaster conditions. To be considered for PA, work must be:

- 1278 • Resulting from the disaster,
- 1279 • The legal responsibility of an Applicant, and
- 1280 • Within a jurisdiction being assessed (except for sheltering and evacuation activities).

1281 Applicants are encouraged to photograph damage. This may expedite damage assessment
1282 validation and help Applicants to document pre-restoration damage should a disaster be
1283 declared. For damage assessments, sufficient photographic documentation should be
1284 submitted for each sample site, along with an indication of how many other sites that
1285 sample represents. Photographs should be included to validate damage at sites where
1286 emergency construction is necessary (e.g., construction of an emergency roadway).

1287 Incorporating these photographs into diagrams or maps can further illustrate the location
1288 and extent of damage and expedite decision making. Refer to [Appendix E: Technology](#) for
1289 information on taking photographs.

1290 Applicants should document damage dimensions, materials, and the size or capacity of
1291 damaged facility elements. This is particularly important for work to be completed because
1292 the information gathered is often critical to estimating and validating work and cost required

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.

1293 for restoration. Providing annotated maps and/or GPS tagged debris locations of damage in
 1294 affected areas may also aid in the validation process and should be included, if possible.

1295 ***PDA System Reporting Application***

1296 The Reporting Application in the PDA System automatically calculates the costs of PA for
 1297 inclusion in the RVAR based on data collected via the mobile field applications. The
 1298 calculations are displayed as a Site Estimate Summary, rolled up by:

- 1299 • State or territory with each county (or equivalent) as a line item, or
- 1300 • County (or equivalent) with each impacted entity (potential Applicant) as a line item.

1301 ***Documenting Work and Cost***

1302 To organize work-related information, FEMA divides each Applicant’s work into logical
 1303 groupings. These groupings first separate activities into two primary work types: emergency
 1304 work and permanent work. These work types are further divided into categories of work (A to
 1305 G) defined by FEMA. This grouping structure is listed in Table 18. Refer to the [PAPPG](#) for
 1306 more information on types and categories of work.

1307 **Table 18. 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

1308 Information describing work and cost should be broken down by category of work. If an
 1309 Applicant is unsure of the category, the work and cost required to restore the facility should
 1310 still be documented so that a category can be assigned at the time of the joint PDA.

1311 The work and cost associated with completed work can be summarized and supported,
 1312 when necessary, with additional documentation. Estimates must be developed for work to
 1313 be completed. A member of an Applicant’s staff that is familiar with the damaged facility and
 1314 develops estimates for similar work or a qualified professional should develop estimates.
 1315 Work and cost estimate calculations should be provided for all work to be completed to
 1316 allow validation of estimates and ensure that it meets program eligibility requirements.
 1317 When damage to a facility is complex or beyond the ability of an Applicant to estimate, FEMA
 1318 technical experts may be requested by an STT government to estimate the work and cost.

1319 Common general methods used to accomplish disaster-related work and estimate costs
 1320 include:

- 1321 • Labor (Force Account),
- 1322 • Equipment (Force Account),
- 1323 • Leased equipment,
- 1324 • Supplies,
- 1325 • Contract service,
- 1326 • Mutual aid agreements,
- 1327 • Repairs versus replacement, and
- 1328 • Landslides and slope stabilization.

1329 The documentation is intended to assist Applicants and emergency managers to prepare
1330 work and cost estimations and are applicable across all categories of work. For more
1331 information, refer to the [PAPPG](#).

1332 *Costs Not Considered*

1333 Costs that are not eligible for PA funding will not be considered during the PA PDA. There are
1334 also costs that may be considered for PA, but not available at the time of the PDA. Examples
1335 include, but are not limited to:

- 1336 • Costs ineligible for PA,
 - 1337 ○ Loss of useful service life of facilities,
 - 1338 ○ Loss of revenue,
 - 1339 ○ Tax assessments,
 - 1340 ○ Increased operating expenses (with limited exceptions for specific emergency
 - 1341 health and safety tasks),
 - 1342 ○ General surveys to assess damage, and
 - 1343 ○ Cost of restoring facilities that were not in active use at the time of the
 - 1344 disaster.
- 1345 • Costs potentially eligible for PA but not considered for a PDA,
 - 1346 ○ Project management or administration costs,
 - 1347 ○ Engineering costs,
 - 1348 ○ Architectural costs,
 - 1349 ○ Financing costs,
 - 1350 ○ Legal fees,
 - 1351 ○ Other pre/post construction expenses.

1352 For additional information and examples, please refer to the [PAPPG](#).

1353 **Active Insurance Coverage**

1354 When conducting a PA PDA, FEMA considers whether a disaster-impacted facility has active
1355 insurance coverage and what the insurance policy covers. Beyond what is covered through
1356 insurance, FEMA will consider the following information when assessing damage:

- 1357 • Applicant's deductible,

- 1358 • Damage not covered under an existing policy or required by regulation, and
1359 • Circumstances where eligible FEMA PA restoration costs exceed policy limits but do
1360 not include costs to upgrade codes and standards.

1361 For less costly damage, FEMA confirms insurance coverage and deductibles verbally with
1362 the Applicant. For more extensive and/or costly damage—or if an Applicant would like FEMA
1363 to consider costs other than a deductible for an insured facility—the Applicant should provide
1364 the state or Tribal Nation and FEMA with a copy of the Applicant’s insurance policy and other
1365 related documentation, such as the insurance adjuster’s report. During a PDA, the FEMA
1366 representative on the PDA team will make the final determination on which projects require
1367 documentation and which projects will be accepted verbally. For further information on
1368 insurance requirements for PA project work, refer to the [PAPPG](#) and [FP 206-086-1: Public
1369 Assistance Policy on Insurance](#).

1370 *Special Flood Hazard Areas*

1371 Applicants that receive PA funding for permanent work to replace, repair, reconstruct, or
1372 construct a facility must obtain and maintain insurance to protect the facility against future
1373 loss. This requirement applies to insurable facilities or property, including those funded as
1374 an Alternate, Improved, or Alternative Procedures Project. If an Applicant’s facility has a
1375 requirement to obtain and maintain insurance as a result of having previously received PA
1376 and the Applicant has failed to do so, that facility is ineligible for assistance and FEMA will
1377 not consider the damage to that facility in the damage assessments.⁹

1378 **Hazard Mitigation Projects**

1379 FEMA considers the extent to which hazard mitigation projects undertaken by the state or
1380 Tribal Nation and/or local governments contributed to the reduction of disaster damage for
1381 the disaster under consideration.

1382 If a state or Tribal Nation can demonstrate in its disaster request that a statewide building
1383 code or other measure is likely to have reduced the cost of repairing damage, this will be
1384 considered in the evaluation of the request. Impact statements are important because the
1385 impact of a disaster will be considered, regardless of whether a state or territorial
1386 government meets the per capita cost indicators. Information should be provided to the
1387 FEMA PDA team lead at the time of the joint PDA and included in the governor’s or TCE’s
1388 request for federal assistance.

⁹ For additional information on insurance requirements, please refer to FP 206-086-1 Public Assistance Policy on Insurance and FEMA Policy 104-22-0003: Partial Implementation of the Federal Flood Risk Management Standard (FFRMS) for Public Assistance (Interim).

1389 **Localized Impacts**

1390 FEMA reviews the facility and cost information to ensure that the estimated costs include all
1391 appropriate insurance reductions and do not include costs related to facilities under the
1392 authority of another federal agency. FEMA then compares the estimated eligible amounts to
1393 the established annual per capita indicators. To account for localized impacts when the
1394 statewide per capita impact is low, FEMA evaluates whether there are extraordinary
1395 concentrations of damage resulting in significantly high per capita impacts at the local
1396 government level.

1397 **Recent Multiple Disasters**

1398 As the effects of multiple disasters in a short period of time can affect response and
1399 recovery capabilities, FEMA also evaluates the overall impacts of disaster declarations that
1400 have occurred within the past 12 months and the extent to which the state, Tribal Nation,
1401 and territory have spent its own funds. If there were disasters prior to the 12-month period
1402 that still have substantial impacts on the SLTT government, FEMA may also consider
1403 impacts from these disasters.

1404 **Per Capita Impact Calculations**

1405 FEMA will evaluate a request for a major disaster declaration authorizing PA if the state:

- 1406 1. Meets or exceed its statewide per capita indicators (PCI), or
- 1407 2. Meets or exceed at least 75 percent of PCI with counties that meet the countywide
1408 PCI (designated counties), and the undesignated counties meet at least 50 percent
1409 of the countywide indicator.

1410 This allows states to include counties with damages that do not meet the countywide PCI in
1411 the statewide calculation. For counties that do not meet at least 50 percent of the
1412 countywide PCI, these costs should not be included in the overall statewide per capita
1413 impact calculation.

1414 **Other Federal Agency Programs**

1415 When it appears that a damaged facility may be within the authority of another federal
1416 agency, FEMA collaborates with the responsible federal agency for assistance with
1417 conducting a PDA. The responsible federal agency reviews the damage and advises FEMA
1418 on whether the work would be eligible under that agency's authority. If the work is eligible
1419 under that agency's authority, the costs for that work would be excluded from the PDA. In
1420 the same manner, the SLTT government should coordinate with the responsible agency for
1421 assistance with conducting a damage assessment.

1422 Areas that may fall within the authority of another federal agency include PNP Applicants,
1423 road restoration, flood control works and streams, federally maintained navigable

1424 waterways, removal of debris against bridges or along roadways located in watershed areas
1425 or in streams with 50 percent or more blockage, and hazardous material removal. If the
1426 disaster-related damage is within the authority of another federal agency, FEMA cannot
1427 consider the estimated costs, regardless of timing or funding availability of the other federal
1428 agency.

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1429 APPENDIX A: ACRONYMS

1430	ALE	Additional Living Expenses
1431	AS	Ancillary Support
1432	BIA	Bureau of Indian Affairs
1433	CAP	Civil Air Patrol
1434	CBRN	Chemical, Biological, Radiological, Nuclear
1435	CERT	Community Emergency Response Team
1436	CFR	Code of Federal Regulations
1437	COAD	Community Organizations Active in Disaster
1438	DHS	Department of Homeland Security
1439	DRRA	Disaster Recovery Reform Act
1440	DTS	Deployment Tracking System
1441	EHP	Environmental and Historic Preservation
1442	EPA	Environmental Protection Agency
1443	FCO	Federal Coordinating Officer
1444	FEMA	Federal Emergency Management Agency
1445	FHWA	Federal Highway Administration
1446	GIS	Geographic Information System
1447	GPS	Global Positioning System
1448	HAZUS	Hazards United States
1449	HQ	Headquarters
1450	HSPD	Homeland Security Presidential Directive
1451	HVAC	Heating, Ventilating, and Air Conditioning
1452	IA	Individual Assistance
1453	IAPPG	Individual Assistance Program and Policy Guide
1454	IDA	Initial Damage Assessment
1455	IHP	Individuals and Households Program
1456	JFO	Joint Field Office
1457	LiDAR	Light Detection and Ranging

1458	NIMS	National Incident Management System
1459	NFIP	National Flood Insurance Program
1460	NGO	Non-Governmental Organization
1461	NHC	National Hurricane Center
1462	NRCS	Natural Resource Conservation Service
1463	NRF	National Response Framework
1464	OCC	Office of Chief Counsel
1465	OCONUS	Outside Continental United States
1466	OEA	Office of External Affairs
1467	OFA	Other Federal Agency
1468	ONA	Other Needs Assistance
1469	ORR	Office of Response and Recovery
1470	PA	Public Assistance
1471	PAPPG	Public Assistance Program and Policy Guide
1472	PDA	Preliminary Damage Assessment
1473	PII	Personally Identifiable Information
1474	PNP	Private Nonprofit
1475	POST	Prioritizing Operations Support Tool
1476	PPD	Presidential Policy Directive
1477	RA	Regional Administrator
1478	RRCC	Regional Response Coordination Center
1479	RVAR	Regional Administrator's Validation and Recommendation
1480	SAR	Synthetic Aperture Radar
1481	SBA	U.S. Small Business Administration
1482	SHPO	State Historic Preservation Office
1483	STT	State, Tribal, and Territorial
1484	SFHA	Special Flood Hazard Area
1485	SLTT	State, Local, Tribal, and Territorial
1486	SME	Subject Matter Expert
1487	SOP	Standard Operating Procedure

1488	SRIA	Sandy Recovery Improvement Act
1489	TCE	Tribal Chief Executive
1490	USACE	United States Army Corps of Engineers
1491	US&R	Urban Search and Rescue
1492	U.S.C.	United States Code
1493	USFWS	U.S. Fish and Wildlife Service
1494	USNG	U.S. National Grid
1495	VAL	Voluntary Agency Liaison
1496	VOAD	Voluntary Organizations Active in Disaster
1497	WDR	Wind-Driven Rain

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1498 APPENDIX B: GLOSSARY

1499 **Applicant.** A non-federal entity that applies to be a subrecipient of assistance under a
1500 recipient's federal award (e.g., local government agency, housing authority, or PNP
1501 organization).

1502 **Community Lifelines.** The community lifeline construct is a model that documents the status
1503 of indispensable services that enable the continuous operation of essential business and
1504 government functions and is critical to human health and safety and/or national economic
1505 security. Community lifelines are a common lens which all responders can use to assess
1506 whether critical life-saving and life-sustaining services are disrupted and, if so, which core
1507 capabilities are required to provide and restore those services.

1508 **Damage Assessments and Information Collection.** Common types of damage assessments
1509 and the appropriate methods for obtaining information for each type.

1510 **Emergency Declaration.** An emergency declaration can be declared for an occasion or
1511 instance when the President determines federal assistance is needed under the Stafford
1512 Act. Emergency declarations supplement state and local efforts in providing emergency
1513 services, such as the protection of lives, property, public health, and safety or to lessen or
1514 avert the threat of a catastrophe in all parts of the United States. The total amount of
1515 assistance provided for a single emergency may not exceed \$5 million. If this amount is
1516 exceeded, the President must report to Congress.

1517 **Environmental and Historic Preservation (EHP).** FEMA provides technical support to
1518 Applicants throughout the recovery process to help ensure compliance with all EHP laws,
1519 regulations, and executive orders, as well as to identify opportunities to incorporate
1520 conservation measures in the project area for the protection and preservation of
1521 environmental or historic resources.

1522 **Essential Living Space.** An essential living space is a room within a home that serves the
1523 function of a bedroom, bathroom, kitchen, and/or living room that is regularly occupied or
1524 used by one or more members of the household and requires repair to bring its functionality
1525 back to the home (e.g., kitchens are considered essential as long as there is not another
1526 undamaged kitchen in the home).

1527 **Expedited Declaration Request.** A state may request, and FEMA may submit and
1528 recommend a Presidential disaster declaration request to the President prior to completion
1529 of a PDA when the magnitude of anticipated or actual impacts of an incident become
1530 unmanageable without national resources. Depending on the extent of damage and
1531 accessibility of impacted areas, FEMA may use alternative methods—such as fly-overs or
1532 windshield assessments led by a federal official—to validate damage and make the full

1533 range of federal assistance available. Refer to FEMA’s Presidential disaster declaration
1534 guidance for additional information on expedited declarations.

1535 **FEMA’s Information Requirements.** Information and documentation commonly requested by
1536 FEMA during the joint PDA process in support of a request for a Presidential disaster
1537 declaration.

1538 **Flood Damage.** Damaged caused by flooding.

1539 **Hazard Mitigation.** Hazard mitigation is any sustained action taken to reduce or eliminate
1540 long-term risk to people and property from natural hazards and their effects.

1541 **Hazard Mitigation Grant Program.** Assistance helps communities implement hazard
1542 mitigation measures following a major disaster declaration in the areas of the state, Tribal
1543 Nation, or territory to reduce the risk of loss of life and property from future disasters.

1544 **Individual Assistance.** Provides federal awards to individuals and households, as well as
1545 SLTT governments, to support individual disaster survivors. Joint PDAs allow impacted
1546 governments to identify and assess disaster damage to determine whether jurisdictions will
1547 request an IA major disaster declaration.

1548 **Initial Damage Assessment.** The effort by local authorities to collect data related to the
1549 extent of damage within a jurisdiction.

1550 **Joint Preliminary Damage Assessment.** The coordinated effort by local, state, and federal
1551 authorities to validate damage data previously identified by state and local authorities to
1552 inform Presidential disaster declaration requests and federal disaster grant determinations.

1553 **Major Disaster Declaration.** The President can declare a major disaster declaration under
1554 the Stafford Act for all natural events—including a hurricane , tornado, storm, high water, wind-
1555 driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide,
1556 snowstorm, or drought, or, regardless of cause, fire, flood, or –that the President believes
1557 has caused damage of such severity that it is beyond the combined capabilities of state and
1558 local governments to respond. A major disaster declaration provides a wide range of federal
1559 assistance programs for individuals and public infrastructure, including funds for both
1560 emergency and permanent work.

1561 **Non-Flood Damage.** Damaged caused by a disaster outside of a flood, such as an
1562 earthquake, tornado, or wildfire.

1563 **Preliminary Damage Assessment.** A mechanism used to determine the impact and
1564 magnitude of damage and the resulting unmet needs of individuals, businesses, the public
1565 sector, and communities as a whole.

1566 **Public Assistance.** Provides federal assistance to support communities' recovery from major
1567 disasters by providing them with grant assistance for debris removal, life-saving emergency
1568 protective measures, and restoring public infrastructure. Joint PDAs are conducted to
1569 identify disaster-related damage and determine whether jurisdictions are eligible for PA.

1570 **Public Assistance Hazard Mitigation.** Any cost-effective measure which will reduce the
1571 potential for damage to a facility from a disaster event. FEMA has authority to provide PA
1572 funding for cost-effective hazard mitigation measures for facilities damaged by the incident.

1573 **Recipient.** A non-federal entity that receives an award from a federal agency (e.g., state,
1574 Tribal Nation, or territorial government) to carry out an activity under a federal program.

1575 **Subrecipient.** An Applicant that receives a sub-award from a recipient to carry out part of a
1576 federal program.

1577 **Technical Assistance.** Prior to a joint PDA request, the state, Tribal Nation, or territorial
1578 government may request technical assistance from the appropriate FEMA Region to support
1579 efforts to evaluate the information submitted by local jurisdictions and/or to analyze the
1580 need for a joint PDA.

1581 **Underserved Communities.** Populations sharing a particular characteristic, as well as
1582 geographic communities, who have been systematically denied a full opportunity to
1583 participate in aspects of economic, social, and civic life. In the context of the federal
1584 workforce, this term includes individuals who belong to communities of color, such as Black
1585 and African American, Hispanic and Latino, Native American, Alaska Native and Indigenous,
1586 Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African
1587 persons. It also includes individuals who belong to communities that face discrimination
1588 based on sex, sexual orientation, and gender identity (including lesbian, gay, bisexual,
1589 transgender, queer, gender non-conforming, and non-binary (LGBTQ+) persons); persons
1590 who face discrimination based on pregnancy or pregnancy-related conditions; parents; and
1591 caregivers. It also includes individuals who belong to communities that face discrimination
1592 based on their religion or disability; first-generation professionals or first-generation college
1593 students; individuals with limited English proficiency; immigrants; individuals who belong to
1594 communities that may face employment barriers based on older age or former incarceration;
1595 persons who live in rural areas; veterans and military spouses; and persons otherwise
1596 adversely affected by persistent poverty, discrimination, or inequality. Individuals may
1597 belong to more than one underserved community and face intersecting barriers.

1598 APPENDIX C: AUTHORITIES AND FOUNDATIONAL 1599 DOCUMENTS

1600 Authorities

1601 Robert T. Stafford Disaster Relief and Emergency Assistance Act. Public Law 1602 93-288, as amended, 42 U.S.C. §§ 5121 et seq.

1603 The Stafford Act, signed into law on November 23, 1988, amended the Disaster Relief Act of
1604 1974 (Public Law 93-288). The Stafford Act constitutes the statutory authority by which the
1605 Federal Government provides disaster and emergency assistance to state, territorial, and
1606 local governments; tribal nations; eligible PNP organizations; and individuals affected by a
1607 declared major disaster or emergency. The Stafford Act covers all hazards, including natural
1608 disasters and terrorist events. The Stafford Act is the primary law governing all new recipient
1609 requests for federal assistance.

1610 Homeland Security Act (Public Law 107-296, as amended, 6 U.S.C. §§ 101 et 1611 seq.)

1612 The Homeland Security Act of 2002 created the Department of Homeland Security (DHS) as
1613 an executive department of the Federal Government. The Homeland Security Act
1614 consolidated component agencies, including FEMA, into DHS. The Secretary of Homeland
1615 Security is the head of DHS and has direction, authority, and control over it. All functions of
1616 all officers, employees, and organizational units of DHS are vested in the Secretary of
1617 Homeland Security.

1618 Post-Katrina Emergency Management Reform Act (PKEMRA) of 2006 (Public 1619 Law 109-295), 2006

1620 The PKEMRA clarified and modified the Homeland Security Act with respect to the
1621 organizational structure, authorities, and responsibilities of FEMA and the FEMA
1622 Administrator. This act enhanced FEMA's responsibilities and its autonomy within DHS. Per
1623 PKEMRA, FEMA is to lead and support the nation in a risk-based, comprehensive emergency
1624 management system of preparedness, protection, response, recovery, and mitigation. Under
1625 the Act, the FEMA Administrator reports directly to the Secretary of Homeland Security.
1626 FEMA is now a distinct entity within DHS, and the Secretary of Homeland Security can no
1627 longer sustain or significantly reduce the authorities, responsibilities, or functions of FEMA—
1628 or the capability to perform them—unless authorized by subsequent legislation. The Act
1629 further directed the transfer to FEMA of many of the functions of DHS's former
1630 Preparedness Directorate.

1631 **Sandy Recovery Improvement Act, January 2013**

1632 The Sandy Recovery Improvement Act (SIRA) authorized several significant changes to the
1633 way FEMA may deliver federal disaster assistance to survivors. It provided greater flexibility
1634 for the use of federal funds for public assistance Applicants if Applicants accept grants
1635 based on fixed, capped estimates. It updated the criteria for evaluating the need for
1636 individual assistance, along with a streamlined process for implementing the Hazard
1637 Mitigation Grant Program. It also offered a package of cost share adjustments,
1638 reimbursement for force account, and retention of programs from recycling to speed debris
1639 removal; and encourages pre-disaster debris planning.

1640 **Regulations**

1641 **Title 44 of the Code of Federal Regulations (CFR), Emergency Management**
1642 **and Assistance.**

1643 The CFR is a codification of the general and permanent rules and regulations published in the
1644 FEDERAL REGISTER that contain basic policies and procedures. Title 44 is titled, “Emergency
1645 Management and Assistance,” and Chapter 1 of Title 44 contains the regulations issued by
1646 FEMA, including those related to implementing the Stafford Act.

1647 **Policies**

1648 **Homeland Security Presidential Directive 5 (HSPD-5), Management of**
1649 **Domestic Incidents, February 28, 2003.**

1650 HSPD-5 enhances the ability of the United States to manage domestic incidents by directing
1651 the establishment of a single, comprehensive NIMS. In addition, the HSPD-5 combines the
1652 investigative and responsive elements of federal agencies (called “crisis management and
1653 consequence management”) into a single approach. The NIMS is designed to cover the
1654 prevention of, preparation for, response to, and recovery from terrorist attacks, major
1655 disasters, and other emergencies.

1656 **Presidential Policy Directive 8 (PPD-8), National Preparedness, March 30,**
1657 **2011**

1658 PPD-8 is aimed at strengthening the security and resilience of the United States through
1659 systematic preparation for the threats that pose the greatest risk to the security of the
1660 Nation, including acts of terrorism, cyber-attacks, pandemics, and catastrophic natural
1661 disasters. PPD-8 mandates the National Preparedness System and the National
1662 Preparedness Goal.

1663 **Individual Assistance Program and Policy Guide (IAPPG), 1.1 FP 104-009-03**
1664 **(May 2021).**

1665 The IAPPG combines all IA policy into a single volume and provides an overview of the IA
1666 program implementation process with links to other publications and documents that
1667 provide additional process details, requirements, and deadlines.

1668 **Public Assistance Program and Policy Guide (PAPPG), FP 104-009-2 (June**
1669 **2020).**

1670 The PAPPG combines all PA policy into a single volume and provides an overview of the PA
1671 program implementation process with links to other publications and documents that
1672 provide additional process details, requirements, and deadlines.

1673 **Doctrine**

1674 **National Response Framework (NRF), October 2019.**

1675 The NRF provides foundational emergency management doctrine for how the Nation
1676 responds to all types of incidents. The NRF is built on scalable, flexible, and adaptable
1677 concepts identified in the NIMS to align key roles and responsibilities across the Nation.
1678 Since publication of the third edition of the NRF in 2016, disaster response operations have
1679 underscored the paramount importance of sustaining essential community lifelines. The
1680 NRF defines community lifelines as those services that enable the continuous operation of
1681 critical government and business functions and are essential to human health and safety or
1682 economic security.

1683 **National Disaster Recovery Framework (NDRF), June 2016**

1684 The NDRF is a guide that enables effective recovery support to disaster-impacted states,
1685 Tribal Nations, territorial governments and local jurisdictions. The NDRF provides a flexible
1686 structure that enables disaster recovery managers to operate in a unified and collaborative
1687 manner. The NDRF also focuses on how best to restore, redevelop, and revitalize the health,
1688 social, economic, natural, and environmental fabric of the community and build a more
1689 resilient nation.

1690 **National Mitigation Framework, June 2016.**

1691 The National Mitigation Framework describes the benefits of being prepared by
1692 understanding risks and what actions can help address those risks. The intended audience
1693 for this document is individuals, families, communities, the private and nonprofit sectors,
1694 faith-based organizations, and federal, state, local, tribal, territorial, and insular area
1695 governments. The second edition of the National Mitigation Framework focuses on a culture
1696 of preparedness which is centered on risk and resilience. The document provides context for

1697 how the whole community works together and how mitigation efforts relate to all other parts
1698 of national preparedness.

1699 **FEMA Publication 1, November 2019.**

1700 Publication 1 serves as FEMA’s capstone doctrine. It helps FEMA employees understand
1701 their role in the emergency management community and provides direction, proper conduct
1702 and decision making. The intent of Publication 1 is to promote innovation, flexibility, and
1703 performance in achieving FEMA’s mission. It promotes unity of purpose, guides professional
1704 judgment, and enables FEMA employees to fulfill FEMA’s responsibilities.

1705 **National Incident Management System (NIMS), October 2017.**

1706 The NIMS is a set of principles that provides a systematic, proactive template for managing
1707 incidents and guiding government agencies at all levels, NGOs, and the private sector to
1708 work seamlessly to prevent, protect against, respond to, recover from, and mitigate the
1709 effects of incidents—regardless of cause, size, location, or complexity—in order to reduce the
1710 loss of life or property and harm the environment.

1711 The NDRF is a guide that enables effective recovery support to disaster-impacted states,
1712 Tribal Nations, territories, and local jurisdictions. The NDRF provides a flexible structure that
1713 enables disaster recovery managers to operate in a unified and collaborative manner; it
1714 focuses on how best to restore, redevelop and revitalize the health, social, economic,
1715 natural, and environmental fabric of the community and build a more resilient nation.

1716 **FEMA Disaster Operations Keystone, 2022.**

1717 The Disaster Operations Keystone (DOK) is the foundation for all FEMA disaster operations
1718 doctrine and provides a strategic overview of FEMA’s approach to disaster operations. This
1719 strategic overview outlines, at a high level, the key functions and underlying concepts that
1720 make up FEMA’s disaster operations and explains their important role in helping survivors
1721 and impacted communities. The DOK explains the “what” and the “why,” establishing the
1722 basis for operational and tactical-level doctrine to build upon and explains the “how,”
1723 “when,” and “who.” Documenting FEMA’s approach helps to synchronize and align disaster
1724 operations, ensuring every member of the FEMA incident workforce works with a common
1725 purpose and in support of FEMA’s overall mission. This document also helps the incident
1726 workforce understand how they contribute to FEMA’s mission of helping people before,
1727 during, and after disasters.

1728 **Public Assistance Program Delivery Guide**

1729 The Public Assistance Program Delivery Guide describes how FEMA implements the PA
1730 Program and establishes the framework for Applicant-driven, state-led, and federally
1731 supported delivery of PA. The PA Program Delivery Guide defines objectives and indicators of

1732 successful program delivery, along with Applicant, Recipient, and FEMA roles and
1733 responsibilities.

1734 **Individual Assistance Declarations Factors Final Guidance, June 2019.**

1735 Individual Assistance Declarations Factors Final Guidance provides additional information
1736 regarding the way FEMA will evaluate a request for IA using the factors at 44 CFR 206.48
1737 (b). This guidance is intended to aid states and territories in drafting requests for major
1738 disaster declarations authorizing IA. It is also intended to provide additional clarity regarding
1739 the circumstances, the severity, and magnitude (relative to state capacity) under which
1740 FEMA is likely to recommend or not recommend a Presidential disaster declaration
1741 authorizing IA. This guidance also describes FEMA's process for evaluating requests for
1742 major disaster declarations authorizing IA and for formulating its recommendation to the
1743 President.

1744 SIRA represents the most significant legislative change to the Federal Emergency
1745 Management Agency's (FEMA) substantive authorities since the enactment of the Robert T.
1746 Stafford Disaster Relief and Emergency Assistance Act. The law authorizes several
1747 significant changes to the way FEMA may deliver federal disaster assistance to survivors.

APPENDIX D: TRIBAL-SPECIFIC CONSIDERATIONS

1748

1749 The Sandy Recovery Improvement Act
1750 amended the Stafford Act in 2013 to give
1751 federally recognized Native American Tribal
1752 Nations, the authority to request an
1753 emergency or major disaster declaration
1754 directly from the President. As a result of this
1755 authority, Tribal Nations have several options
1756 for seeking disaster assistance from the
1757 Federal Emergency Management Agency
1758 (FEMA) through its Individual Assistance (IA)
1759 and Public Assistance (PA) programs. These
1760 options provide Tribal Nations important
1761 opportunities for flexibility and the ability to
1762 exercise their right to self-determination.

FEMA Assistance Options for Federally Recognized Tribal Nations

A Tribal Nation may apply for FEMA assistance in several ways:

- Recipient with its own declaration.
- Subrecipient under a state declaration.
- Recipient under a state declaration.
- 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.

1763 In addition to unique cultural, geographic, and legal considerations, Tribal Nations have
1764 multiple choices in how to seek assistance from FEMA. Together, these factors affect the
1765 preliminary damage assessment (PDA) process and what actions are required to best
1766 support Tribal Nations.

Purpose of This Appendix

1767
1768 The purpose of this appendix is to highlight areas of the PDA process that are unique for
1769 Tribal Nations, particularly for those associated with PDAs for Tribal Nations that are
1770 requesting their own major disaster declaration from the President.

Using This Appendix

1771
1772 This appendix describes critical considerations for conducting PDAs with federally
1773 recognized Tribal Nations. This appendix can be used as a reference for Tribal Nation, state,
1774 and Federal Government officials in the conduct of the PDA process with federally
1775 recognized Tribal Nations. Information from the main text of the PDA Guide is intentionally
1776 repeated here. This appendix is designed to establish a broader context for all entities in
1777 understanding the unique technical, cultural, and legal considerations involved with the PDA
1778 process supporting federally recognized Tribal Nations.

What Are Preliminary Damage Assessments?

1779
1780 A PDA is the term for an assessment conducted to identify damage after a disaster. The
1781 state, Tribal Nation, or territorial government conducts the initial damage assessments

1782 (IDA). The state, Tribal Nation, or territorial government may then conduct the joint
1783 preliminary damage assessments (joint PDA) with FEMA. The IDA and/or joint PDA can be
1784 conducted as either an IA or PA program damage assessment. Depending on the disaster,
1785 FEMA may be required to conduct damage assessments for both IA and PA.

1786 IDAs are conducted by the Tribal Nation immediately following a disaster to validate and
1787 document impacts to the Tribal Nation community and to evaluate the Tribal Nation's
1788 capacity to respond and recover from the disaster and what additional resources and
1789 assistance are required. IDAs should help answer the following questions:

- 1790 • Are the Tribal Nation's resources overwhelmed?
- 1791 • Where is the damage, and what areas have the greatest needs?
- 1792 • What are the Tribal Nation's unmet needs?

1793 Tribal Nations should conduct IDAs before they request joint PDAs from FEMA. IDAs are
1794 important because they do the following:

- 1795 • Help identify damage that needs to be validated by FEMA and the Tribal Nation
1796 through the joint PDA process;
- 1797 • Help identify resource gaps and where additional assistance is required;
- 1798 • Inform the strategy for joint PDAs with FEMA; and
- 1799 • Provide time to identify who has legal responsibility for damage.

1800 At all points in the IDA process, Tribal Nations can request technical assistance from their
1801 respective FEMA Regional office to support the damage assessment process (even before
1802 making a formal request for a joint PDA to FEMA). This may include FEMA support in
1803 coordinating with other federal agencies with trust and/or programmatic responsibilities for
1804 damage incurred. Early collaboration with all relevant federal agencies with a potential role
1805 in assisting Tribal Nations in the recovery process is critical to a successful response and
1806 recovery effort.

1807 Joint PDAs are conducted collaboratively between FEMA and the Tribal Nation (and
1808 sometimes states) to review and validate disaster-related damage and expenses identified
1809 in the Tribal Nation's IDA. PDAs are foundational to any request for federal assistance under
1810 the Stafford Act and:

- 1811 • They must be requested by the Tribal Chief Executive (TCE) to the appropriate FEMA
1812 Regional Administrator (RA); and
- 1813 • They are critical for informing a Presidential disaster declaration request.

1814 Tribal Nations submit requests for technical assistance, joint PDAs, and Presidential disaster
1815 declarations to the FEMA Regional office in which the Tribal Nation seat is located, but
1816 assistance can be provided from across FEMA Regions depending on the requirements to
1817 meet Tribal Nation resource requests. Tribal Nations that want to be considered part of a
1818 state's joint PDA or Presidential disaster declaration request should work with the RA,

1819 Regional Recovery Division Director, and tribal liaison in the region in which the requesting
1820 state is located. FEMA must then ensure that states have collaborated with and included
1821 Tribal Nations in their request for PDAs.

1822 Individual Assistance

1823 FEMA IA programs deliver
1824 supplemental assistance to disaster
1825 survivors for unmet needs caused by
1826 a declared Stafford Act incident.
1827 Support may include assistance for
1828 temporary housing and housing
1829 repairs, critical disaster-related
1830 expenses, the replacement of
1831 essential personal property, and
1832 funding to the Tribal Nation for IA
1833 program services. Refer to the
1834 Individual Assistance Program and
1835 Policy Guide and Tribal Declarations
1836 Pilot Guidance for more information
1837 on IA programs and eligibility.

1838 When Tribal Nations receive an IA
1839 disaster declaration, they must
1840 define and identify their unique
1841 "tribal community." The tribal
1842 community, as defined by the Tribal
1843 Nation, are the individuals the Tribal
1844 Nation wants to be eligible to receive
1845 IA. Tribal Nations can facilitate the IA
1846 PDA process by identifying their tribal
1847 community either before or during
1848 the joint PDA. A tribal community is
1849 typically enrolled members of the
1850 Tribal Nation and other individuals
1851 that are the responsibility of the Tribal Nation (e.g., descendants, widows/widowers, adopted
1852 children, and others). Tribal declarations are also not limited to tribal lands or reservations,
1853 and they may include any tribal community member that lives within an area impacted by
1854 the disaster. This is not limited to tribal lands, reservation, township, county, or state
1855 boundaries. Tribal Nations are encouraged to identify these individuals before an event
1856 occurs. Tribal declarations can also be expanded to include tribal-owned facilities, tribal
1857 interest lands, tribal lands, or reservations.

Data Sovereignty and Data Sharing

FEMA respects the data sovereignty of Tribal Nations and relies on the information provided by the Tribal Nation during the assistance process. To support PDAs, Tribal Nations are encouraged to provide a list of their tribal community members to FEMA. FEMA understands that this is sensitive information and is committed to holding it to the highest standards of data security as personal identifiable information (PII). Through a memorandum of understanding (MOU), Tribal Nations can provide FEMA the following information, which will help FEMA validate the damage of eligible tribal community members:

- Enrolled tribal community members;
- Homes owned by enrolled tribal community members (addresses, if available);
- If applicable, identify additional categories of individuals (e.g., adopted children, widows/widowers, descendants, etc.) who are considered by the Tribal Nation to be a part of the tribal community;
- List of tribal interests impacted by the event such as tribal businesses, cultural sites, tribal infrastructure and tribal members that fall outside of designated tribal lands or reservations but were impacted by the event and are otherwise eligible as defined by tribal law ordinances and practices; and
- Any additional information on members of the tribal community.

1858 **Public Assistance**

1859 The FEMA PA program provides emergency assistance to save lives and protect property and
 1860 assists with permanently restoring community infrastructure. PA is divided into two types of
 1861 work emergency work and permanent work. These work types are further divided into
 1862 categories of work (A to G) defined by FEMA. This grouping structure is listed in Table 19.

1863 **Table 19. 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

1864 Refer to the Public Assistance Program and Policy Guide and Tribal Declarations Guidance
 1865 for more information on PA programs and eligibility.

1866 When available, Tribal Nations may facilitate the PA PDA process by identifying which federal
 1867 agencies have legal and statutory authority for permanent or emergency work involving
 1868 specific tribal programs and infrastructure and what limits exists, if any. While not a
 1869 requirement, early identification and engagement with these entities ensures that FEMA can
 1870 assist in ensuring all applicable federal resources are being utilized. Table 20 provides a
 1871 general overview on which entities should be included in determining responsibility. This list
 1872 is not all inclusive; however, it may streamline the PDA process, ensure the appropriate
 1873 federal agencies are engaged, and assist both the Tribal Nation and FEMA in determining
 1874 what damages are eligible for FEMA assistance. For example, the Tribal Nation can identify
 1875 which roads may be eligible for funding from the Federal Highway Administration (FHWA)
 1876 Emergency Relief for Federally Owned Roads program (ERFO) for permanent repair and
 1877 restoration of disaster damaged roads following a disaster. This preparation streamlines the
 1878 PA PDA process and helps identify what damage is eligible for federal assistance.

1879 **Table 20. Other Federal Agencies that Provide Federal Assistance to Tribal Nations**

Damaged Infrastructure	OFA Authority for Tribal Nations
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), U.S. Department of Agriculture (USDA)
Waterways	USDA, Natural Resources Conservation Service, United States Army Corps of Engineers (USACE), and BIA

Damaged Infrastructure	OFA Authority for Tribal Nations
Health Service Facilities	Indian Health Service
Housing	U.S. Department of Housing and Urban Development (HUD), USDA
Utilities	EPA, USACE, USDA, Department of Energy
Schools	Bureau of Indian Education
Parks, Recreation	National Park Service and BIA
Other Infrastructure	HUD, USDA, and USACE

1880 PDA Process

1881 For most incidents affecting Tribal Nations,
 1882 the decision to request FEMA assistance
 1883 directly from the President should not be
 1884 made until PDAs have taken place in
 1885 coordination and collaboration with FEMA
 1886 and the state(s). If the Tribal Nation decides
 1887 to pursue a joint PDA, the Tribal Nation
 1888 should request a joint PDA through the
 1889 FEMA Region, with the region facilitating
 1890 further communication, and to initiate the
 1891 damage assessment and provide additional information on its options for the assessment.
 1892 The information gathered during PDAs is an essential element of a Tribal Nation’s
 1893 Presidential disaster declaration request.

Expedited Declarations

If the magnitude of anticipated or actual impacts of an incident are outside the resources of the Tribal Nation to respond, the Tribal Nation may request, and FEMA may submit a recommendation for a disaster declaration to the President with or without completing the joint PDA.

1894 Tribal Nation Completes IDA

1895 When an incident occurs, the Tribal Nation conducts an IDA to validate and review damage
 1896 to the tribal community. IDAs help the Tribal Nation understand the scope and scale of
 1897 disaster-related damage and expenses and the Tribal Nation’s resource capacity to respond.
 1898 The Tribal Nation also records all other information or data that might demonstrate the need
 1899 for additional resources. Before the incident occurs, Tribal Nations can prepare for IDAs by
 1900 identifying the authorities appropriate to participate in the assessment team, detailing roles
 1901 and responsibilities, and by conducting pre-disaster exercises to test and validate the team
 1902 roles, responsibilities, and procedures to be utilized.

1903 Tribal Nations may require technical assistance to complete the IDA. Requirements for
 1904 completing the IDA may be adjusted on a case-by-case basis based on the Tribal Nation’s
 1905 capabilities and incident-specific conditions. Tribal Nations are not always expected to
 1906 complete all IDA requirements or participate in an IDA with the state. However, Tribal
 1907 Nations are encouraged to conduct as detailed an IDA as possible to facilitate both the PDA
 1908 and declaration process.

1909 **PDA Operations in a Tribal Setting**

1910 When conducting a PDA, collaboration with the Tribal Nation is critical. State, regional, and
1911 federal employees should never make unilateral decisions; they should work closely with
1912 Tribal Nation leadership on the coordination of all activities that will be conducted on tribal
1913 lands, or involve tribal property, businesses, and cultural interests:

- 1914 • Never conduct PDAs without an invitation from Tribal Nation leadership;
- 1915 • Select method(s) for damage assessments in coordination with the Tribal Nation;
- 1916 • FEMA should conduct all damage assessments with a Tribal Nation escort; and
- 1917 • FEMA should ensure that when Tribal Nation cultural interests may be impacted that
1918 all activities have been coordinated with the Tribal Nation and their tribal historical
1919 preservation office (THPO).

1920 A large federal government presence can be perceived as intrusive or insensitive to the
1921 privacy and sovereignty of the Tribal Nation. FEMA should take efforts to minimize their
1922 impact by coordinating with the FEMA tribal liaison and the Tribal Nation. Based on feedback
1923 from the tribal liaison and the Tribal Nation, FEMA may consider:

- 1924 • Limiting the size of teams to essential personnel while assessing damage on Tribal
1925 Nation land;
- 1926 • Requiring that leadership has met with Tribal Nation leadership to establish any
1927 ground-rules and/or procedures to be followed prior to deploying any field staff; and
- 1928 • Ensuring all field staff have received a Tribal Nation specific cultural brief prior to
1929 deployment to the field.

1930 PDAs could be perceived as invasive for Tribal Nations. FEMA personnel should allow the
1931 Tribal Nation to provide information at its own pace and consider unique cultural and
1932 government practices. This requires constant communication to ensure deadlines are met or
1933 proper extensions requested. To do so, FEMA should employ methods that prioritize the
1934 privacy of tribal community members and never approach or photograph culturally
1935 significant sites or items, individuals, or personal/tribal property without permission. When
1936 possible, FEMA will deploy a tribal liaison and a civil rights advisor with the joint PDA team to
1937 provide additional guidance and support to FEMA personnel conducting assessments.

1938 **Individual Assistance IDA**

1939 When a disaster has impacted the homes of a tribal community, Tribal Nations may start to
1940 consider whether they should conduct IA IDAs. An IA IDA occurs when the Tribal Nation
1941 assesses the damage to individual homes. There are a variety of methods that Tribal
1942 Nations can use to assess damage to homes in their community, described in Table 21.
1943 Individual Tribal Nations must decide which methods work best for their operational,
1944 cultural, and privacy needs. A common methodology for conducting IA IDAs is a combination
1945 of self-reporting, windshield surveys, and door-to-door assessments.

Table 21. 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 Nation or Tribal Nation emergency manager. This process contains several steps: <ul style="list-style-type: none"> • Tribal Nation creates or identifies an appropriate method for the public to report damage (e.g., phonenumber and email address). • Tribal Nation sends out a public message requesting tribal community members with disaster-related impacts to report those impacts. • Tribal Nation collects this information in damage assessment reports. • Tribal Nation 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 validate reports from the field. Assessment teams record observed damage while driving through impacted areas, periodically stopping to conduct interviews with tribal community members to validate damage, insurance coverage, or ownership status.
Door-to-Door Assessment	Door-to-door assessments happen when Tribal Nation officials physically go to each home, meet and interview owners or renters, and document actual damage. This process is more time intensive, but it improves accuracy, which is valuable for steps later 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.

1947 When a Tribal Nation requests a Presidential disaster declaration to include the IA program,
 1948 disaster-related impacts to homes and personal property are the principal factors FEMA and
 1949 the President use to determine if the request should be approved. However, these are not
 1950 the only factors. The impact of disasters and the ability of Tribal Nations to support recovery
 1951 can vary greatly. For this reason, a variety of disaster-related information should be collected
 1952 to support requests for Stafford Act assistance. This information should illustrate overall
 1953 impact and underscore how the unique resources of the Federal Government are necessary
 1954 to support tribal community members.

1955 In general, pre-disaster conditions are a significant concern in underserved communities.
 1956 When living conditions are already a challenge pre-disaster, determining incident-specific
 1957 damages is difficult to assess and evaluate. Interpretations may differ significantly on the
 1958 impacts of the event between the tribal community member, the Tribal Nation
 1959 representative, and FEMA PDA team members. In these cases, door-to-door assessments
 1960 are the best means to minimize interpretation differences and potentially inform the scope
 1961 and scale of other efforts required that go beyond the scope of the FEMA IA program.

1962 Tribal Nation-specific factors¹⁰ that FEMA uses to determine disaster impacts and eligibility
1963 for IA include the following:

- 1964 • Underinsured homes and personal property losses;
- 1965 • Availability of housing resources;
- 1966 • Casualties;
- 1967 • Impact on community infrastructure that may adversely affect a population's ability to
- 1968 safely and securely reside within the community (e.g., disruption of normal
- 1969 community functions and services, impacts on cultural and spiritual facilities, and
- 1970 emergency needs);
- 1971 • Disaster impacted population profile:
 - 1972 ○ FEMA considers the demographics of the whole community including older
 - 1973 members of the community, people with disabilities, children and other
 - 1974 people who have access and functional needs such as individuals who have
 - 1975 limited English proficiency or are non-English speaking and individuals with a
 - 1976 low income as they may have a greater need for support during disaster
 - 1977 recovery;
- 1978 • Extent of voluntary agency assistance and assistance being made available by other
- 1979 federal agencies, private non-profits, as well as support from state and local
- 1980 governments;
- 1981 • Tribal Nations' resources available for response and recovery;
- 1982 • Unique conditions that affect Tribal Nations (e.g., remoteness, economy, and cultural
- 1983 considerations); and
- 1984 • Other relevant information.

1985 FEMA has identified critical information that should be collected and validated when
1986 assessing damage to individual homes. This information corresponds with the previous IA
1987 declaration factors:

- 1988 • Cause of damage;
- 1989 • Concentration of damage;
- 1990 • Homeownership rate of impacted homes:
 - 1991 ○ Because damage to Tribal Nation homes could fall under IA or PA depending
 - 1992 on the owner and who has legal responsibility for the dwelling, Tribal Nations
 - 1993 should include a Tribal Nation housing authority representative in the IDA
 - 1994 process to accurately capture home ownership;
- 1995 • Number of homes with insurance;
- 1996 • Number of homes destroyed and number with major, minor, and affected damage
- 1997 amounts;
- 1998 • Inaccessible areas;
- 1999 • Special flood hazard areas if mapped;

¹⁰ Refer to the Tribal Declarations Pilot Guidance for additional information on these factors.

2000 • Other relevant information like income levels, poverty, trauma, etc.

2001 Proof of ownership is not required until tribal community members register for IA. (It is not

2002 required during the PDA process.) However, for some types of IA housing and other needs

2003 assistance (ONA) tribal community members must own the home. Proof of ownership

2004 includes the following:

2005 • Title/deed/official record,

2006 • Mortgage statement,

2007 • Real property insurance bill, or

2008 • Written self-declarative statement if all other documentation is unavailable, such as a

2009 representative designated by tribal leadership validating ownership and occupancy.

2010 Residential housing may fall under PA in some scenarios, such as the following:

2011 • Home has a U.S. Department of Housing and Urban Development-/U.S. Department

2012 of Agriculture-financed mortgage loan not fully paid off by the borrower/occupant

2013 (Title not conveyed to borrower and held by the Tribal Nation), or

2014 • Home owned by the Tribal Nation housing authority.

2015 Knowing how ownership verification works during the PDA process will help inform which

2016 program will be responsible for which damage. Tribal housing authority representatives are

2017 important resources that can provide insight into which home titles are held by individuals

2018 and which home titles are held by the Tribal Nation. Table 22 contains information on

2019 identifying ownership and legal responsibility for Tribal Nation housing. Refer to the IAPPG

2020 and PAPPG for additional information on eligibility for IA and PA, respectively.

2021 **Table 22. 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 Tribal Nation 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 Tribal Nation).
Tribal housing authority owns the house or has otherwise assumed responsibility for maintenance and repair.	A Tribal Nation 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 Tribal Nation).

Arrangement/ Ownership	Responsibilities	Individual Assistance Eligibility	Public Assistance Eligibility
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.
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 Tribal Nation).
Individual rents on Tribal Nation land.	Renter pays a fee or lives rent-free in dwelling.	Personal property only.	Land (if owned by the Tribal Nation).
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 Tribal Nation).

2022 Table 23 can be used as a quick reference for evaluating and categorizing damage to
 2023 individual homes, including flood damage, for conventionally built homes and manufactured
 2024 homes. For more information, refer to Chapter 3: Individual Assistance Damage
 2025 Assessments.

2026 **Table 23. Damage Levels and Criteria for Homes**

Damage Type	Conventionally Built Homes	Manufactured Homes
Affected	Residences with minimal cosmetic damage (e.g., waterline of less than three inches).	Residences with minimal cosmetic damage (e.g., waterline below the floor system, or damaged skirting).
Minor	Residences with non-structural damage (e.g., waterline between three inches and two feet in the lowest floor with essential living space).	Residences with non-structural damage (e.g., waterline has reached the floor system but has not entered the living space).
Major	Residences sustaining structural damage requiring extensive repairs (e.g., waterline between two feet and six feet in essential living space).	Residences sustaining structural damage requiring extensive repairs (e.g., waterline in the living space, but less than six feet).
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, waterline over six feet).	The residence is a total loss (e.g., waterline over six feet; frame is bent or twisted).

2027 Many types of traditional tribal dwellings, such as adobes, pueblos, teepees, chickees, or
 2028 longhouses, may be eligible for Individual Assistance under FEMA's definition of non-
 2029 traditional housing. Non-traditional housing may be more prevalent in tribal communities.
 2030 Non-traditional homes may require repair or construction based on established customs or
 2031 require that the repairs be conducted by individuals trained by the Tribal Nation in traditional
 2032 methods of repair and construction. Additionally, while many types of non-traditional housing

2033 such as tents or teepees may not typically be eligible for Housing Assistance, residents of
2034 non-traditional housing may be eligible for Rental Assistance or Other Needs Assistance.
2035 Tribal dwellings should be considered by FEMA on a case-by-case basis. The standard use of
2036 the Individuals and Households Program IA Cost Calculator may not be applicable to tribal
2037 dwellings and FEMA Regional staff should consult with the FEMA HQ PDA Unit or IA
2038 leadership at the regional or HQ levels for more guidance on the proper application of costs
2039 for these dwellings.

2040 **Public Assistance IDA**

2041 When a disaster impacts the public infrastructure of a tribal community and/or requires a
2042 significant amount of emergency protective measures to save lives and protect property,
2043 Tribal Nations may consider conducting PA IDAs. At the outset of a disaster, emergency
2044 managers may not know exactly which damage and work would be eligible for FEMA's PA
2045 program. Tribal Nations should document all work related to disaster response and all
2046 damage to their community infrastructure. If requested, FEMA will work with the Tribal
2047 Nation during the joint PDA to determine what may be potentially eligible for PA.

2048 While IDA teams are not expected to know whether damage will ultimately be eligible for the
2049 PA program, teams can utilize the basic building blocks of eligibility to better understand
2050 what to look for when documenting damage and work. The four basic components of PA
2051 eligibility are (1) Applicant, (2) facility, (3) work, and (4) cost:

- 2052 • Applicant must be a Tribal Nation entity¹¹ or certain types of eligible private nonprofit
2053 (PNP) organizations that operate facilities that provide critical services and are
2054 organized or doing business under tribal law.¹²
- 2055 • Facility must be a building, public works, system, equipment, or natural feature.
- 2056 • Work must be required as a result of the declared incident and the legal
2057 responsibility of the Tribal Nation.
- 2058 • Cost must be adequately documented, authorized, necessary, and reasonable.
2059 (Eligible costs include labor, equipment, materials, and contract work).

2060 A common methodology for PA IDAs is to conduct a combination of site assessments and
2061 interviews with Applicants. Review Table 24 for more details.

¹¹ Facilities owned and operated by the Tribal Nations, including casinos, hotels, and other for profit businesses may also be eligible for PA.

¹² For additional information on eligibility, please refer to the PAPPG.

Table 24. PA Methodologies

Method	Description
Site Assessments to View Actual Damage	<ul style="list-style-type: none"> • Tribal damage assessment teams can work with the Tribal Nation emergency manager and other Tribal Nation authorities and agencies to identify damage areas and the determine the legally responsible organization or agency. Emergency responder logs can also be a good source of identifying damage sites. This could include a myriad of Tribal Nation entities, to include Tribal Nation public safety (fire, police, emergency management) and other Tribal Nation departments with responsibility at the community, district, and Tribal Nation level. Regions should work with Tribal Nations pre-disaster to incorporate procedures and processes in the tribal emergency operations plan to ensure documentation and activity logs are emphasized. • Damage assessment teams will conduct in-person visits with their Tribal Nation and Other Federal Agency (OFA) counterparts to damaged areas to collect data and photographs, prioritizing the most significant damage first, as defined or identified by tribal authorities.
Interviews of Applicants	<ul style="list-style-type: none"> • 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. This should include, where possible, information which describes or demonstrates the pre-disaster condition.

2063 According to the Tribal Declarations Guidance, absent extraordinary circumstances, FEMA
 2064 will consider a declaration request from a Tribal Nation for PA only if it is determined that the
 2065 Tribal Nation sustained the minimum damage amount (MDA) of PA-eligible damage
 2066 determined to be required for a Tribal Nation. While the MDA is a principal factor in the
 2067 declaration process, there are many other factors that FEMA and the President take into
 2068 consideration when evaluating a Tribal Nation’s request for the PA program. The impact of
 2069 disasters and the ability of Tribal Nations to support recovery operations can vary greatly.
 2070 For this reason, a variety of disaster-related information should be collected to support
 2071 requests for Stafford Act assistance. This information should illustrate overall impact and
 2072 underscore how the unique resources of the Federal Government are necessary to support
 2073 tribal community members.

2074 Factors that FEMA will ultimately use to determine disaster impacts and a Tribal Nation’s
 2075 eligibility for PA include the following:¹³

- 2076 • Achieved minimum damage amount,
- 2077 • Insurance coverage in force,

¹³ Refer to the Tribal Declarations Pilot Guidance for additional information on these factors.

- 2078 • Programs available from other federal agencies to address the Tribal Nation's needs,
- 2079 • Evaluation of previous mitigation efforts,
- 2080 • Recent disaster activity over the past 24 months, including, but not limited to
- 2081 previous FEMA declarations,
- 2082 • Types and amounts of damage,
- 2083 • Economic impact of the damage to the tribal community and government,
- 2084 • Tribal resources available for response and recovery,
- 2085 • Demographics of the impacted community,
- 2086 • Impact on community infrastructure,
- 2087 • Unique conditions that affect Tribal Nations (e.g., remoteness, economy, and cultural
- 2088 considerations), and
- 2089 • Other relevant information which describes the impact on the Tribal Nation and why it
- 2090 exceeds their capability and capacity and is critical to their recovery as a nation.

2091 **Tribal Nation Coordinates with State and Local Emergency Officials**

2092 In many cases, when a Tribal Nation is impacted by a disaster, surrounding jurisdictions
2093 have also been affected. Regular coordination and collaboration among government
2094 representatives help establish which government entity is responsible for which damage or
2095 work. When possible, Tribal Nations and surrounding local jurisdictions should share their
2096 assessment results and make sure all the damage and work has been captured and none of
2097 the damage/work has been recorded twice.

2098 Before a Tribal Nation officially requests joint PDAs from FEMA, it may choose to collaborate
2099 with the state to help both entities understand what impacts each have sustained from the
2100 disaster. The Tribal Nation can determine whether it will be advantageous to coordinate
2101 instead of filing separately as they might mutually benefit in some way by conducting joint
2102 PDAs together or even collaborating on a Presidential disaster declaration request.

2103 For some Tribal Nations that are either very large or have multiple separated Tribal Nation
2104 lands, the central Tribal Nation may have coordinated IDAs with multiple localized teams
2105 throughout its Tribal Nation land areas. In these cases, it is important for the Tribal Nation to
2106 validate IDA information before requesting a joint PDA with FEMA. During a joint PDA, FEMA
2107 does not identify damage; it validates damage that has already been identified and reviewed
2108 by the Tribal Nation. If a Tribal Nation intends to request FEMA assistance as a subrecipient
2109 or recipient under a state's declaration, the Tribal Nation should consider contributing to the
2110 state's overall IDA by sending its damage information to the state. In some cases, impacts to
2111 the Tribal Nation are so significant that a state or a county may not receive a declaration
2112 without the Tribal Nation.

2113 While collaboration between the Tribal Nation, state, and FEMA is important for the PDA
2114 process, the relationship between the Tribal Nation, state, and local communities may not
2115 be conducive to the level of cooperation described above. Tribal Nations have the right to

2116 sovereignty and self-determination; however, cooperation can be mutually advantageous
 2117 and assist FEMA in its role in supporting the PDA and declaration request process.
 2118 Collaboration is always encouraged when feasible and in the best interests of the impacted
 2119 communities. Tribal Nations can also request technical assistance when performing an IDA
 2120 if they have limited experience or resources available.

2121 **Tribal Nation Requests Joint PDA with FEMA**

2122 Prior to requesting a joint PDA, FEMA will
 2123 review for accuracy IDA information
 2124 provided and validate by the Tribal Nation.
 2125 This review includes validated of the cause
 2126 of damage, impacted jurisdictions,
 2127 location of damage, and insurance
 2128 coverage. Additionally, at this stage in the
 2129 process, Tribal Nations should be
 2130 considering whether they want to include
 2131 state or local government representatives
 2132 in their joint PDA.

2133 If the damage is of such severity and
 2134 magnitude that resources needed to
 2135 recover are expected to exceed the Tribal
 2136 Nation’s capabilities, the TCE may request
 2137 a joint PDA from the appropriate FEMA RA.

2138 These requests are written and informed by IDA data. Tribal Nations have 30 days from the
 2139 end of the incident period to either request a declaration or submit a request for an
 2140 extension. The Tribal Declarations Guidance has instructions on how to request a
 2141 Presidential disaster declaration.

2142 **Tribal Nation Develops PDA Plan of Action**

2143 The Tribal Nation is responsible for developing a PDA plan of action but may request FEMA
 2144 technical assistance to facilitate this effort. The PDA plan of action should include the
 2145 following elements (Table 25).

2146 **Table 25. PDA Plan of Action Elements**

Program	Plan of Action Elements
Public Assistance	<ul style="list-style-type: none"> Suggested organization and composition of the joint PDA teams (e.g., tribal team leads, tribal historic preservation officer, tribal roads subject matter expert, other federal agencies having specific trust and/or fiduciary responsibilities, state/local government officials, housing officials, and tribal guides designated by the Tribal Nation with intimate knowledge of the areas being assessed if appropriate, etc.).

Joint PDAs and Working with the State(s)

States who request their own joint PDAs should ask all Tribal Nations in the impacted areas to participate. In this case, a Tribal Nation who chooses to participate in a state-FEMA joint PDA does not necessarily need to request a separate joint PDA that excludes the state to request its own major disaster declaration. FEMA must validate a Tribal Nation's damage through a joint PDA (regardless of if the state was involved or not) in order to recommend that a declaration request is approved. If the Tribal Nation chooses this option, the tribal damages must be removed from the state PDA/disaster declaration request.

Program	Plan of Action Elements
	<ul style="list-style-type: none"> • A list of damaged facilities and infrastructure and their corresponding estimates. This may include commercial entities or facilities that are the responsibility of the Tribal Nation to maintain and operate. • 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. • Coordination with the regional tribal liaison.
Individual Assistance	<ul style="list-style-type: none"> • 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. Impacts may be prioritized in non-traditional ways, such as through input from tribal elders or culturally significant communities. • Coordination with the regional tribal liaison.

2147 In preparation for conducting a joint PDA with FEMA and/or the state, the regional tribal
2148 liaison should provide FEMA staff with an accurate and appropriate cultural awareness
2149 training prior to beginning any in-person activities. The Tribal Nation should also identify
2150 tribal representatives who can escort FEMA staff to damage sites and who are
2151 knowledgeable regarding the legal responsibility, ownership, and insurance coverage for
2152 disaster-impacted infrastructure and housing within the tribal community.

2153 **FEMA-Tribal Nation Joint PDA**

2154 Once a joint PDA is requested, FEMA and the Tribal Nation collaborate closely to ensure
2155 damages are assessed in a timely and efficient manner and to discuss findings and
2156 reconcile all differences. While disagreements may exist, it is important that the rationale for
2157 decision making be transparent and communicated with Tribal Nation leadership, including
2158 the TCE and appropriate representatives.

2159 Teams comprised of the appropriate Tribal Nation and federal staff (and potentially state
2160 and local staff if they have been included) execute joint PDAs in accordance with the Tribal
2161 Nation’s PDA plan of action. PDA field teams should comprise at least one representative of
2162 the Tribal Nation and one representative of FEMA. Other Tribal Nation representatives,
2163 agencies, and NGOs may also be asked to participate, as needed. During the joint PDA, the
2164 Tribal Nation and FEMA representatives are responsible for validating damages recorded
2165 during the IDA through visual confirmation and compiling site visit summaries and damage

2166 estimates. The PDA team will conduct a briefing to synthesize all PDA summaries and reach
 2167 concurrence on damage estimates.

2168 At the close of the joint PDA, FEMA will provide the Tribal Nation or TCE with a final summary
 2169 of its findings to assist the Tribal Nation’s decision about whether to request a disaster
 2170 declaration. Table 26 provides a high-level example chronology for conducting PDAs.

2171 **Table 26. Joint PDA Chronology Example**

Step	Individual Assistance Elements	Public Assistance Elements
Pre-Arrival Scheduling	<p>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, by understanding priorities, but scheduling will ultimately be established by the Tribal Nation.</p>	
	<p>When conducting door-to-door assessments, the Tribal Nation's Emergency Management office and the regional tribal liaison should set up appointments, when possible, with homeowners so that FEMA staff can assess each home individually and meet with tribal community members with a tribal representative always present.</p>	<p>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. Tribal council members or other senior tribal officials who want to participate in these events should be accommodated, despite the potential for delays.</p>
FEMA Arrival	<p>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 Tribal Nation’s PDA plan of action. The tribal liaison or tribal advisor coordinates PDA team assignments with the Tribal Nation emergency manager.</p>	
Pre-Assessment Meeting	<p>Typically, in the morning before the first assessments, FEMA and the Tribal Nation will meet in person at a central location or all together on a conference call. These meetings should be conducted in person whenever possible. In this forum, Tribal Nation officials can provide an overview of the damage they have validated, review the tribal PDA plan of action, ask questions of FEMA, and ensure each team knows its roles, responsibilities, schedules, and geographic areas.</p>	
Cultural Awareness Training	<p>FEMA Regional tribal liaisons may have already provided a brief training to FEMA staff on cultural awareness when working with Tribal Nations 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 Tribal Nation. (For example, are there lands or facilities that are off limits to FEMA staff because of the cultural, spiritual nature of the area?)</p>	
Assessments	<p>Whether door-to-door assessments or windshield surveys, IA PDAs often require a lot of driving from one location, neighborhood, or township to the next. .</p>	<p>For each site assessment, interview, or group interview, the tribal team lead will introduce and facilitate the discussion with the Applicant and the FEMA team lead will provide a brief overview of the FEMA PA</p>

Step	Individual Assistance Elements	Public Assistance Elements
		program and the types of documents FEMA needs to validate damage and work. While at damage sites, joint PDA team members will take photographs with the permission of the Tribal Nation to record damages and supplement with drawings and detailed descriptions when photographing is either not possible or is culturally inappropriate.
Coordination	Throughout the process, the tribal and FEMA PDA coordinators maintain communication and openly and transparently discuss damage estimates and eligibility considerations. Both the tribal and FEMA leadership representatives 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. Damage should be assessed and validated to the fullest extent possible. The PDA team will conduct a briefing to synthesize all PDA summaries and reach concurrence on damage estimates. FEMA will provide the Tribal Nations or Tribal Chief Executive (TCE) with a final summary of its findings to assist the Tribal Nation's decision about whether to request a disaster declaration.	

2172 **Request for Presidential Disaster**
2173 **Declaration**

2174 The TCE should make the request to the
2175 President through the appropriate FEMA RA.
2176 When a request for declaration is received, the
2177 FEMA RA reviews the request and validates the
2178 information gathered during the joint PDA. The
2179 FEMA RA submits their recommendation in the
2180 regional administrator's validation and
2181 recommendation (RVAR) to the FEMA
2182 Administrator at FEMA HQ. Tribal Nations have
2183 30 days from the of the end of the incident
2184 period to request a Presidential disaster
2185 declaration or to submit a request for an
2186 extension. The Tribal Declarations Pilot
2187 Guidance has instructions on how to request a
2188 Presidential disaster declaration.

2189 If a Tribal Nation decides that it will not request
2190 a Presidential disaster declaration, information
2191 gathered during the joint PDA may be used to
2192 request assistance from other federal agencies
2193 (e.g., U.S. Small Business Administration [SBA])
2194 or to request assistance through state

Evaluate Other Options

If a Tribal Nation evaluates damage with FEMA and determines that there is not enough damage or insufficient tribal capacity to warrant requesting a Presidential disaster declaration request on its own, the Tribal Nation should evaluate other recovery options.

These include being a Recipient or subrecipient under a 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.

The Tribal Nation and FEMA Region should maintain close coordination through the regional tribal liaison during this process and Tribal Nations should leverage FEMA technical assistance and coordinating capabilities as required to identify the full range of options available.

2195 government recovery programs. FEMA Regions will provide technical assistance to Tribal
 2196 Nations upon request to explore and coordinate other means to meet Tribal Nation needs
 2197 even when a Presidential disaster declaration is not made.

2198 **PDA Partners**

2199 FEMA and the Tribal Nation may also receive support from other federal agencies when
 2200 conducting the joint PDA. Other agencies most often included in supporting the PDA process
 2201 are the United States Army Corps of Engineers (USACE), United States Department of
 2202 Agriculture (USDA), FHWA, Housing and Urban Development (HUD), U.S. Small Business
 2203 Administration (SBA), and the Bureau of Indian Affairs (BIA). Table 27 lists the OFAs that are
 2204 often key partners in support of tribal PDAs.

2205 **Table 27. Other Federal Agencies that Support Tribal PDAs**

Partner	Support
Bureau of Indian Affairs	<ul style="list-style-type: none"> Provides technical assistance and identifies damage that may fall under existing grant programs/legal authorities of their agencies; and Provides federal assistance to assess damage to culturally significant sites/property, such as pow wow grounds, museums, campgrounds, and culturally significant agriculture or livestock.
U.S. Department of Housing and Urban Development	<ul style="list-style-type: none"> Provides technical assistance and identifies damage that may fall under existing grant programs/legal authorities of their agencies
U.S. Army Corps of Engineers	<ul style="list-style-type: none"> Assists in the preparation of Tribal preliminary damage assessment (PDA) process as required; Provides technical assistance for debris management and structural inspections as required; and Provides technical assistance and identifies damage that may fall under existing grant programs/legal authorities of their agencies.
U.S. Department of Transportation	<ul style="list-style-type: none"> Activates the Emergency Relief for Federally Owned Roads (ERFO) program when the combined cost of disaster-related work (including emergency repair) for roads on the National Tribal Transportation Facility Inventory (NTTFI) reaches \$700,000 in one state; Activates the ERFO when the combined cost of disaster-related work (including permanent work) for roads on the NTTFI reaches \$700,000 in one state; and Provides funding for damaged roads listed on the NTTFI from the Federal Highway Administration (FHWA) and/or the Bureau of Indian Affairs (BIA).
U.S. Department of Agriculture	<ul style="list-style-type: none"> Provides technical assistance and identifies damage that may fall under existing grant programs/legal authorities of their agencies. Provides assistance through the Emergency Watershed Protection Program (EWPP) as part of Landscape Planning in the Natural Resources Conservation Service (NCRS).
Indian Health Service	<ul style="list-style-type: none"> Provides funding for health care centers or clinics damaged during a disaster on Tribal Nation land.

Partner	Support
Environmental Protection Agency	<ul style="list-style-type: none"> Oversees the recovery of the Tribal Nation waste management system through the Tribal Waste Management Program.
National Park Service	<ul style="list-style-type: none"> Provides federal assistance to assess damage to culturally significant sites/property, such as pow wow grounds, museums, campgrounds, and culturally significant agriculture or livestock.

2206 **Overarching Considerations**

2207 Disaster grant program delivery is generally the same for Tribal Nations as it is for all
 2208 recipients; however, there are some overarching differences that should be clarified before
 2209 PDAs begin:

- 2210 • Tribal recipients cannot pass FEMA assistance to state and local governments for
 2211 work completed by the state or local government that is within their responsibility.
- 2212 • Insurance considerations may be unique for some Tribal Nations.
- 2213 • Cultural or spiritual sites and items may be eligible and should be identified.
- 2214 • Tribal Nations responsibilities and eligibility are not limited geographically to tribal
 2215 lands.
- 2216 • Trust and Treaty responsibilities must be considered in determining who has fiduciary
 2217 responsibility.
- 2218 • Tribal Nations define who is eligible for assistance.

2219 **Tribal Nations as a Pass-through Entity**

2220 Recipients are non-federal entities that receive an award from a federal agency (e.g., Tribal
 2221 Nations). Some recipients are considered “pass-through entities” if they pass the federal
 2222 award to a subrecipient. Tribal Nations cannot be pass-through entities for non-tribal
 2223 subrecipients. When a Tribal Nation receives a direct declaration, the only entities that can
 2224 be subrecipients to the Tribal Nation are tribal organizations (e.g., tribal housing authority) or
 2225 private nonprofit organizations organized or doing business under tribal law. Tribal recipients
 2226 cannot pass FEMA assistance to state and local governments for work completed by the
 2227 state or local government that is the legal responsibility of the state or local government. If
 2228 the Tribal Nation can demonstrate sole or joint legal responsibility either through a mutual
 2229 aid agreement or through maintenance records, FEMA can reimburse the Tribal Nation for
 2230 the work the Tribal Nation has completed. In some cases, through a mutual aid agreement,
 2231 Tribal Nations can be reimbursed for work completed on behalf of a Tribal Nation by a state
 2232 or local entity as part a mutual aid or resource sharing agreement. The Tribal Nation would
 2233 then reimburse the local or state government per the terms of the agreement. Additional
 2234 information about mutual aid agreements can be found in the Tribal Declarations Guidance.
 2235 Disaster-related damage or work that is the legal responsibility of a non-tribal local
 2236 government or non-governmental organization should not be included in a Tribal Nation’s
 2237 PDA; this type of work would be the responsibility of the state or local entity.

2238 Tribal Insurance Coverage

2239 Tribal Nation often have unique insurance coverages. PDA teams should work with the tribal
2240 housing authority and the Tribal Finance/Insurance authority to see how homes and tribal
2241 property are covered for insurance. In some cases, insurance on a tribally owned enterprise
2242 (e.g., a casino) also includes broader coverage terms that extend to the entire Tribal Nation
2243 and can be applied to many tribally owned buildings (including homes). Tribal Nations
2244 should provide PDA teams a general understanding of how insurance coverage may relate to
2245 an incident. In addition, FEMA may ask for copies of insurance documents at the time of a
2246 joint PDA.

2247 Cultural Sites and Items

2248 Cultural and traditional sites and items may be eligible for assistance under the PA program
2249 or the IA program, depending on who owns them and how they are maintained. In some
2250 cases, unimproved spiritual or cultural sites could be eligible under federal disaster grants.

2251 PDA teams will need the expertise of tribal cultural or historic preservation officers or
2252 experts to determine if damage has occurred to cultural sites. Damage to cultural sites and
2253 items should be reflected in the Tribal Nation's impact statement. A FEMA EHP
2254 representative with tribal experience and an archeological background should participate in
2255 PDAs to identify concerns and provide the necessary coordination with the THPO when
2256 possible. Additionally, it may be difficult or impossible to assign a monetary value to
2257 damaged cultural items and sites. The FEMA EHP representative should work with the Tribal
2258 Nation's cultural preservation experts to provide technical assistance and information on
2259 various parties that may provide the Tribal Nation's valuation.

2260 If sacred sites are damaged, FEMA staff are not required to conduct site inspections where
2261 people who do not have permission from the Tribal Nations are not allowed. FEMA will
2262 accept a Tribal Nation's certified damage assessment as a valid alternative to requiring
2263 FEMA staff to document and validate damage at these sacred sites. Additionally, to support
2264 the protection of tribal significant artifacts and human remains, FEMA will not require
2265 photos, site maps, and specific location details, such as GPS coordinates, for locations
2266 where tribal artifacts are located. This ensures that culturally sensitive data remains
2267 protected, that the Tribal Nation's cultural heritage is safeguarded, and their governmental
2268 sovereignty is strengthened.

2269 FEMA typically uses a standardized list of personal property items to determine which
2270 disaster-damaged items may be eligible for IA ONA. For individual cultural items to be
2271 eligible for IA reimbursement, the Tribal Nation must submit an ONA Administrative Option
2272 Selection Form and add its cultural, spiritual, or traditional line items to the standard
2273 personal property line-item list. Tribal recipients submit their form to FEMA annually by
2274 November 30, regardless of the option selected; however, certain FEMA Regions do not

2275 require forms to be submitted annually for review and approval based on the number of
2276 Tribal Nations in their particular region. Following a major disaster declaration in which IA is
2277 an approved program, all updates to the form must be completed by the recipient within 72
2278 hours of authorization of IA. All items added to the list are subject to the 25 percent non-
2279 federal cost share. This should be addressed with the Tribal Nation during the PDA process
2280 and again immediately upon notification of the declaration to ensure the appropriate ONA
2281 items of cultural significance are included. Items that the Tribal Nation intends to submit as
2282 eligible in the post-declaration ONA Administrative Option Selection Form should be included
2283 in the PDA estimates.

2284 **Restoration of Traditional Tribal Residential and Ceremonial Structures**

2285 The PA program can fund the restoration of tribal-owned residential structures and tribal
2286 ceremonial buildings; however, there are no PA processes that consider how traditional
2287 tribal structures are built in a manner consistent with maintaining their cultural, historical,
2288 governmental, or ceremonial construct. This includes construction with adobe, mud, earth,
2289 clay, rock, and wood.

2290 FEMA accepts a Tribal Nation’s certified damage assessment, scope of work for restoration,
2291 and estimated costs for traditional tribal residences or tribal ceremonial buildings. PA also
2292 identifies available codes and standards applicable for traditional residential structures that
2293 Tribal Nations can consider adopting and that can be incorporated into restoration scopes of
2294 work in future disasters. FEMA will also provide tribal Applicants and recipients with cost
2295 effective mitigation measures for traditional tribal residential structures and ceremonial
2296 buildings to preserve the homes of indigenous people.

2297 **Cultural Considerations**

2298 When conducting a joint PDA, tribal leadership must be regularly updated so that they can
2299 provide direction and support. FEMA Regional Recovery Divisions should also build PDA
2300 teams with culturally aware staff who have experience with the unique program
2301 considerations for Tribal Nations. To ensure the PDA team will be appropriate for tribal
2302 damage assessments:

- 2303 • The regional tribal liaison should provide tribe-specific cultural awareness training to
- 2304 the PDA team;
- 2305 • PDA teams should engage tribal leadership at the appropriate level;
- 2306 • PDA team lead should brief tribal leadership on the PDA process and ask for any
- 2307 feedback that can be incorporated into “just-in-time” training for the PDA team;
- 2308 • PDA teams should include an Environmental and Historic Preservation (EHP)
- 2309 representative (Historic Preservation Specialist) to coordinate activities with the
- 2310 Tribal Historic Preservation Officer (THPO) per regional EHP direction;

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- PDA team should work with the Tribal Nation to identify tribal community members who are familiar with the legal ownership status of disaster damaged infrastructure and households and can participate in PDAs;
- PDA teams should consider whether to wear FEMA-branded clothing or use vehicles with Federal Government license plates;
- 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;
- PDA teams should dress in a culturally appropriate manner; and
- PDA teams should understand that Tribal Nations have limited resources and may require additional technical assistance and coordination, which may increase PDA timelines.

DRAFT

2322 APPENDIX E: TECHNOLOGY

2323 Various technologies can be used to improve the timeliness, accuracy, transparency, and
2324 comprehensiveness of damage assessments. This appendix reviews technologies that are
2325 already used by the emergency management community. State, local, tribal, and territorial
2326 (SLTT) government partners are encouraged to explore and leverage additional technologies
2327 they may have access to.

2328 Mobile Surveys

2329 Mobile damage assessment applications can increase the accuracy of information collected
2330 by serving as job aids that walk the assessor through the information required to evaluate
2331 damage. This standardized information intake approach, combined with the ability to attach
2332 photographs to each assessment conducted, allows for validation and feedback. Together,
2333 these elements increase the quality of information developed in the field and enable
2334 emergency managers to further leverage the use of non-emergency management staff to
2335 conduct assessments and increase capability.

2336 FEMA has developed mobile surveys for conducting preliminary damage assessments (PDA).
2337 FEMA has also made templates for these surveys that are maintained by the FEMA PDA
2338 Program Office. These templates are publicly available resources that SLTT government
2339 officials can use to create their own versions of a mobile survey platform. Templates can be
2340 accessed at [FEMA.gov/PDA](https://www.fema.gov/PDA).

2341 Virtual Validation

2342 In certain circumstances, FEMA may use photographs and other data collected by SLTT
2343 governments to validate damage virtually. Virtual validation can be utilized to supplement
2344 site assessments in situations when damage is inaccessible, when the work has already
2345 been completed, or when damage can be validated easily through photography. Additionally,
2346 virtual validation may be a principal method when FEMA and SLTT governments choose to
2347 conduct desktop assessments—assessments with little to no onsite validation. FEMA and
2348 the SLTT may employ virtual sensing to support IA and PA damage assessments.

2349 Photographs can communicate a wealth of contextual information for staff involved in the
2350 PDA process. FEMA best practices on taking photographs may be used by SLTT governments
2351 with the capability and capacity to take and submit photographs of damage directly to FEMA:

- 2352 • Take several wide-view photographs of the entire facility from multiple angles. For
2353 example, photograph road damage from both ends of the road.
- 2354 • Take wide-view photographs of each component, capturing the entire component.
- 2355 • Take close-up photographs of each damaged component to show details.

- 2356 • For all photographs, include an item to indicate size, such as a traffic cone, tape
2357 measure, or pen.
- 2358 • For all photographs, capture distinctive stationary features to indicate position, such
2359 as flags, signs, cones, desks, or trees. When taking multiple photographs, ensure
2360 reference items help a reader “stitch together” the scene.
- 2361 • When taking photographs inside structures, take photographs in a panoramic style.
2362 Stand in one place and turn in a circle while taking photographs. Turn a few degrees
2363 after taking each photograph and ensure the edges of photographs overlap.
- 2364 • Ensure lighting and perspective allow a viewer to clearly see damages.
- 2365 • Include GPS coordinates and perspective (e.g., east and west) on each photograph.
- 2366 • Photograph all damage indicated by the Applicant, even if the damage may not be
2367 eligible for FEMA disaster assistance. Take photographs and closeups of everything
2368 that raises a concern.

2369 When leveraging technology to document damage, special consideration must be given to
2370 protection of privacy and information security related to data collection. To leverage
2371 technology responsibly, it is necessary to consider the following:

- 2372 • Personally Identifiable Information (PII).
- 2373 • Data storage and whether data is accessible to all parties who can use it (local, state,
2374 and federal).
- 2375 • Data accuracy.
- 2376 • Timing of data collection.
- 2377 • Contract requirements for open access and/or restrictions or cyber security
2378 concerns.

2379 For additional guidance on FEMA’s standards for privacy and information security related to
2380 data sharing, refer to the Department of Homeland Security (DHS) Handbook for
2381 Safeguarding Sensitive PII.

2382 **Geospatial Damage Assessment Tool**

2383 The Response Geospatial Office (RGO) Geospatial Damage Assessment (GDA) tool allows
2384 SLTT partners and FEMA to understand disaster impacts quickly after an event. The tool
2385 helps determine impact areas to prioritize during Initial Damage Assessments (IDA) and
2386 supports their requests for a joint PDA with FEMA. The tool can also be used to support the
2387 analysis of potential add-on counties for a declaration.

2388 To ensure eligibility and that that assessments are consistent with Individual Housing
2389 Program (IHP) Cost Calculator formulas and PA eligibility:

- 2390 • The IA team should determine whether the damaged structure is the primary or
2391 secondary residence, whether it is owned or rented, and whether the residents have
2392 insurance and/or flood insurance.

2393 • PA eligibility criteria, such as Per Capita Impact Indicator, Costs, PDA Estimates/Loss,
2394 Categories of Work, and Applicant-Type (e.g., government or private/non-profit), must
2395 be included.

2396 When using the GDA, FEMA staff and SLTT partners should:

- 2397 • Build occupancy data to determine which damaged structures would potentially be
2398 eligible for IHP assistance and which structures are outbuildings or otherwise not
2399 dwellings.
- 2400 • Include quality imagery to conduct complete GDAs. After an incident, quality aerial
2401 imagery, taken as soon as possible, is required to conduct complete GDAs. The result
2402 of incomplete imagery will result in a mismatch between in-person PDAs and imagery.
2403 When imagery is taken in a timely manner, GDAs can assist with understanding
2404 where to conduct field-based assessments, especially after a flood incident where
2405 water line and other ground-based information is crucial.
- 2406 • Coordination with the GDA teams is to understand potential add-on counties.

2407 Drones

2408 As part of DHS, FEMA is not authorized to operate drones to collect damage information.
2409 However, the PDA team will accept imagery and damage information collected through a
2410 drone if the SLTT government submits it as part of the IDA.

2411 Artificial Intelligence

2412 An SLTT government may use Artificial Intelligence (AI) and machine learning to collect
2413 information and develop its impact statement as part of the IDA. FEMA information
2414 developed through AI is an acceptable methodology for collecting and assessing damage
2415 information.

2416 **APPENDIX F: PDA FORMS**

2417 **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 damage.					
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).

2418

PA Site Sheet Example

SHEET _____ OF _____ SHEETS

FEDERAL EMERGENCY MANAGEMENT AGENCY PRELIMINARY DAMAGE ASSESSMENT SITE ESTIMATE			DATE	
PART I — APPLICANT INFORMATION				
COUNTY	NAME OF APPLICANT	NAME OF LOCAL CONTACT	PHONE NO.	
PART II — SITE INFORMATION				
KEY FOR DAMAGE CATEGORY <i>(Use appropriate letters in the "category" blocks below)</i>				
a. DEBRIS REMOVAL		d. WATER CONTROL FACILITIES		g. OTHER <i>(Parks, Recreational Facilities, etc.)</i>
b. PROTECTIVE MEASURES		e. PUBLIC BUILDINGS		
c. ROADS AND BRIDGES		f. PUBLIC UTILITIES		
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
NAME OF INSPECTOR		AGENCY		OFFICE PHONE NO.
				HOME PHONE NO.

FEMA Form 90-81, MAR 95

2423 **APPENDIX G: HOME INSURANCE MATRIX**

2424 Table 28 provides generalized home insurance details.

2425 **Table 28. IA Housing Insurance Matrix**

Insurance Type	Property Covered	Property Not Covered	Perils Covered	Perils Not Covered
Flood	<p>Owners Only: All real property from the first floor above ground level up; real property in basement below ground level (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.</p> <p>Homeowners and Renters: Property in basement (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.</p>	<p>Real Property: Water wells, well pumps, oil or propane tanks, septic tanks, seawalls, retaining walls, washouts (access), and dikes.</p> <p>Personal Property: Property stored in basements below grade level, as identified by the individual policy.</p>	<p>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.]</p>	<p>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).</p> <p>{Note: Not all perils listed are excluded nationwide or in OCONUS areas. Consult with local/state or municipalities insurance commissioners for details.}</p>
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	<p>Owners: All real property, including separate structures; removal of debris deposited by covered peril; personal property; and additional living expenses (ALE) for covered perils.</p> <p>Renters: All personal property, including personal property away from premises and ALE for covered perils.</p>	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	Unit: 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. Master: 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.

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2427 **APPENDIX H: INDIVIDUAL ASSISTANCE DAMAGE MATRICES**

2428 Tables 29 and 30 provide the damage assessment matrices for manufactured and conventionally built homes, respectively.

2429 **Manufactured Homes**

2430 **Table 29. 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	<ul style="list-style-type: none"> • Cosmetic damage only (e.g., skirting is impacted). • Damage to retaining walls or downed trees that do not affect access to the residence. 	<ul style="list-style-type: none"> • Cosmetic damage only (e.g., skirting is impacted). • Damage to gutters, retaining walls, or downed trees that do not affect access to the residence.
Minor	The residence is damaged and requires minimal repairs.	In Floor System Only	<ul style="list-style-type: none"> • When the waterline has reached the floor system but has not entered the living space of the residence. • Bottom board insulation or ductwork affected. • Heating, ventilating, and air conditioning (HVAC) is impacted. • There is no structural damage to the residence, and it has not been displaced from its foundation. 	<ul style="list-style-type: none"> • There is no structural damage to the residence, and it has not been displaced from its 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.	Less than Six Inches in Living Space	<ul style="list-style-type: none"> • Waterline of less than six feet inside the residence. • The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged. 	<ul style="list-style-type: none"> • The residence has been displaced from the foundation, block, or piers, and other structural components have been damaged. • Fifty percent or more of nonstructural components (e.g., roof shingles, drywall, and utility hookups) have sustained significant damage.
Destroyed	The residence is a total loss.	More than Six Feet	<ul style="list-style-type: none"> • Waterline is over six feet. • Residence's frame is bent, twisted, or otherwise compromised. 	<ul style="list-style-type: none"> • The residence's frame is bent, twisted, or otherwise compromised. • The majority of the structural framing of the roof or walls has been compromised,

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Inaccessible	Damage to residence cannot be visually verified.	N/A	<ul style="list-style-type: none"> Floodwater or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence. 	<ul style="list-style-type: none"> Debris or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.

2431 **Conventionally Built Homes**

2432 **Table 30. 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.	Less than Three Inches	<ul style="list-style-type: none"> Waterline in the crawlspace or an unfinished basement when essential living spaces or mechanical components are not damaged or submerged. Waterline of less than three inches in the lowest floor with essential living space. Damage to retaining walls or downed trees that do not affect access to the residence. 	<ul style="list-style-type: none"> Cosmetic damage, such as paint discoloration or loose siding. Minimal missing shingles or siding. Damage to gutters, retaining walls, or downed trees that do not affect access to the residence.

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Minor	The residence has sustained a wide range of damage that does not affect structural integrity.	Three Inches to Two Feet	<ul style="list-style-type: none"> • Waterline between three inches and two feet in the lowest floor with essential living space. • When waterline exceeds three inches but is below two feet, damage may be recorded as Major, depending on extenuating conditions: <ul style="list-style-type: none"> • Duration of the flood • Contaminants in the water (e.g., sewage, heating fuel, other chemicals, etc.). • Waterline in basement with damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.). • Damage or disaster-related contamination to a private well or septic system. 	<ul style="list-style-type: none"> • 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.
Major	The residence has sustained significant structural damage and requires extensive repairs.	Two Feet to Six Feet, or Less than Two Inches with Extenuating Conditions	<ul style="list-style-type: none"> • Waterline between two feet and six feet in the lowest floor with essential living space. • Waterline on the first floor (regardless of depth) if the basement is completely submerged. 	<ul style="list-style-type: none"> • 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, and shifting of the residence from its foundation.

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: (e.g., damaged to such an extent that repair is not feasible, requires demolition, and/or confirmed to be in imminent danger).	Over Six Feet	<ul style="list-style-type: none"> Waterline over 6 feet in the lowest floor with essential living space. 	<ul style="list-style-type: none"> Only foundation remains. Complete failure of two or more major structural components (e.g., collapse of basement walls, foundation, walls, or roof). The residence is in imminent danger (e.g., impending landslide, mudslide, or sinkhole).
Inaccessible	Damage to residence cannot be visually verified.	N/A	<ul style="list-style-type: none"> Floodwater or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence. 	<ul style="list-style-type: none"> Debris or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.

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APPENDIX I: PUBLIC ASSISTANCE DOCUMENTATION CHECKLIST

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Table 31 provides a checklist for supporting documentation.

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Table 31. Public Assistance Supporting Documentation Checklist

Supporting Documentation	PA Work Category						
	A	B	C	D	E	F	G
Photographs (sample if multiple similar damage has occurred)	X	X	X	X	X	X	X
Force account (work completed)	X	X	X	X	X	X	X
Basis for estimations (work to be completed)			X	X	X	X	X
Historic costs for similar work (provide example for large projects)			X	X	X	X	X
Notated maps	X	X	X	X	X	X	X
Contracts, bids, or invoices	X	X	X	X	X	X	X
Commercial estimating source report (RS Means, Cost Works, etc.)			X	X	X	X	X
Codes and standards to be considered (provide when the code or standard will dramatically increase the cost of restoration)			X	X	X	X	X
Estimate by professional familiar with the facility (provide breakdown – especially when replacement is requested)			X	X	X	X	X
Recent safety inspection reports or maintenance records that show pre-disaster condition (provide for large projects)			X	X			
Information used to evaluate the need for reconditioning (provide if reconditioning is requested)						X	
Debris quantity calculation sheet	X						
Mutual aid agreements used (provide for large projects)		X					
Specifications or as-built drawings of the damage facility (provide when helpful, only for large projects)				X			
Recent inspection reports or maintenance records that show pre-disaster condition (provide when pre-disaster condition may impact estimate of large project)				X			
Insurance documentation needed to establish deductible and limits (provide for large projects)					X		

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APPENDIX J: PUBLIC ASSISTANCE WORK ELIGIBILITY MATRIX

2439 Table 32 provides the PA work eligibility matrix.

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Table 32. 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	<p>Debris types include the following:</p> <ul style="list-style-type: none"> • 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 	<p>Emergency protective measures include the following:</p> <ul style="list-style-type: none"> • 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 	<p>Road components include the following:</p> <ul style="list-style-type: none"> • Surfaces • Bases • Shoulders • Ditches • Drainage structures • Low water crossings • Associated facilities <p>Bridge components include the following:</p> <ul style="list-style-type: none"> • Decking • Guardrails • Girders • Pavement • Abutments • Piers • Slope protection 	<p>Water control facilities include the following:</p> <ul style="list-style-type: none"> • 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 	<p>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.</p>	<p>Utilities include the following:</p> <ul style="list-style-type: none"> • 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 	<p>Publicly owned facilities include the following:</p> <ul style="list-style-type: none"> • 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

	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Approaches • Associated facilities 	<ul style="list-style-type: none"> • Pumping facilities • Navigational waterways and shipping channels 			
Applicant	<p>State and territorial governments, federally recognized Tribal Nations, 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 Public Assistance Program and Policy Guide (PAPPG) for additional details.</p>					
Facility	<p>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.</p>					
Cost	<p>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:</p> <ul style="list-style-type: none"> • 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. 					

2442

APPENDIX K: PUBLIC ASSISTANCE WORK ASSESSMENT MATRICES

2443 Tables 33, 34, and 35 provide the PA work assessment matrices for Categories A, B, and C-G.

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Table 33. 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.	<input type="checkbox"/>	Annotated maps.
Location of Debris Operations Facilities	USNG location for staging, reduction sites, disposal sites, pickup locations, etc.		
Work Completed	Percent of debris removal completed at time of assessment.	<input type="checkbox"/>	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:	<input type="checkbox"/>	Photographs (to show work completed, work to be completed, and locations where estimates were developed).
	<ul style="list-style-type: none"> • Vegetative • Construction and demolition • Hazardous waste • Household hazardous waste • White goods (household appliances) • Electronic waste 	<ul style="list-style-type: none"> • 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?	<input type="checkbox"/>	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.	<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).
		<input type="checkbox"/>	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Provide time and rate of all force account equipment used.	<input type="checkbox"/>	Equipment cost summary.
Force Account Supply Costs	Provide a list of all force account supplies used and their cost.	<input type="checkbox"/>	Supply cost summary.

Information	Description of Information Needed	✓	Supporting Documentation/Validation
Contract Costs	Provide actual costs or the costs estimates of all contracts.	<input type="checkbox"/>	For large projects, provide contractor bids or invoices and disposal invoices.
Unit Costs	Cost per ton or cubic yard with explanation of calculation.	<input type="checkbox"/>	Brief statement explaining calculation.
Recycling or Reusing Debris?	Yes/No	<input type="checkbox"/>	N/A
Unique Removal Requirements	For example, special equipment, long hauls, staging, reduction, hazardous materials, local ordinances, etc.	<input type="checkbox"/>	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	<input type="checkbox"/>	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation Requirements	Narrative describing environmental and historic preservation requirements.	<input type="checkbox"/>	Narrative describing EHP requirements such as impacts to historical buildings/structures, involvement of hazardous materials, and the proximity to natural and cultural resources like water, wetlands, floodplains, endangered species and cemeteries.

2445

Table 34. 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.	<input type="checkbox"/>	Notated maps.
Type of Emergency Protective Measures	Details of the emergency protective measures required.	<input type="checkbox"/>	Description of the emergency protective measures required.
Type of Work	Force account, contract, mutual aid, or combination.	<input type="checkbox"/>	N/A
Force Account Labor Costs	Regular time and overtime hours and rates.	<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).
		<input type="checkbox"/>	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	<input type="checkbox"/>	Equipment cost summary.
Force Account Supply Costs	List supplies used and cost.	<input type="checkbox"/>	Supply cost summary.
Material Costs	List of materials and cost per unit.	<input type="checkbox"/>	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.

Information	Description of Information	✓	Supporting Documentation/Validation
Contract Costs	Actual or estimates.	<input type="checkbox"/>	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.	<input type="checkbox"/>	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	<input type="checkbox"/>	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	<input type="checkbox"/>	Narrative describing EHP considerations such as impacts to historical buildings/structures, involvement of hazardous materials, and the proximity to natural and cultural resources like water, wetlands, floodplains, endangered species and cemeteries.

2446

Table 35. 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.	<input type="checkbox"/>	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.	<input type="checkbox"/>	Photographs.
Repair or Replacement	Justification for repair or replacement.	<input type="checkbox"/>	
Damage Dimensions	Size, length, capacity, etc., of damage.	<input type="checkbox"/>	
Damaged Elements/Equipment/Building Contents	Individual elements of the facility that have been damaged.	<input type="checkbox"/>	
		<input type="checkbox"/>	Recent safety inspection or maintenance records that show pre- disaster condition (large projects only).
		<input type="checkbox"/>	Codes and standards to be considered (when it dramatically increases cost).
Type of Work	Force account, contract, or combination.	<input type="checkbox"/>	Brief statement about whether work is force account, contract, or a combination.
Force Account Labor Costs	Regular time and overtime hours and rates.	<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).

Information	Description of Information	✓	Supporting Documentation/Validation
		<input type="checkbox"/>	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	<input type="checkbox"/>	Equipment cost summary.
Force Account Supply Costs	List supplies used and cost.	<input type="checkbox"/>	Supply cost summary.
Material Costs	List of materials and cost per unit.	<input type="checkbox"/>	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.
Contract Costs	Actual or estimates.	<input type="checkbox"/>	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.	<input type="checkbox"/>	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	<input type="checkbox"/>	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	<input type="checkbox"/>	Relevant documentation validation EHP considerations.

2447