

# PRELIMINARY DAMAGE ASSESSMENT GUIDE

#### **SUMMARY OF CHANGES**

### **Background**

The *Preliminary Damage Assessment (PDA) Guide* defines a standard national-level framework for how state, local, tribal, and territorial (SLTT) government officials and FEMA staff collect, validate, quantify, and document the cause, location, and details of damage following a disaster. The *PDA Guide* helps emergency management officials at all levels of government efficiently complete accurate and consistent PDAs that align Stafford Act Presidential disaster declaration request requirements.

### **Purpose**

This document summarizes the updates made to the *PDA Guide* since updates began in May 2022. It includes detailed descriptions of updates made throughout each chapter of the guide, highlighting the major changes that impact SLTT government officials or FEMA staff.

## **Summary of Changes**

To update the *PDA Guide*, the Recovery Directorate made several high-level changes throughout the document to incorporate up-to-date guidance and program requirements.

#### **High-Level Summary of Changes**

The high-level updates include:

- Consolidating the methodology for conducting the Individual Assistance (IA) and Public Assistance (PA) PDA concept of operations into a single, shared PDA process described in Chapter 2;
- Restructuring and clarifying the overview of the PDA process in Chapter 2;
- Expanding on the importance of completing the initial damage assessment (IDA);
- Consolidating roles and responsibilities for IA and PA PDAs into a single, shared list in Chapter 2;
- Consolidating the methodologies for conducting a joint PDA into a new chapter;
- Improving guidance for Tribal Nations by clarifying how Tribal Nations can participate in the joint PDA;
- Adjusting the level of detail for the descriptions of the IA and PA programs to focus on how eligibility requirements connect to the PDA process;



- Incorporating new policy and programmatic requirements for the IA and PA programs, including:
  - Updated declaration factors;
  - Updated documentation requirements;
  - Updated IA damage levels for homes;
  - New IA equity rules;
  - Updated evaluation factors for PA requests; and
  - An explanation of PA per capita impact calculations;
- Expanding Appendix: D Tribal-Specific Considerations so that it serves as stand-alone guidance for Tribal Nations; and
- Adding up-to-date templates, matrices, and resources to the appendices.

#### **Detailed Summary of Changes**

Table 1 summarizes substantive updates made to the PDA Guide.

Table 1: Summary of Changes to the PDA Guide

Dogo	Line	lindata
Page	Line	Update Chapter 1: Introduction
	I	Chapter 1: Introduction
	74 - 93	Updated the Tribal-Specific Guidance section to better describe how Tribal Nations can participate in the PDA process and request a presidential disaster declaration by:
3 - 4		<ul> <li>Providing additional background information on the authorities given to Tribal Nations through the Stafford Act and Sandy Recovery Improvement Act when participating in the PDA process;</li> <li>Outlining the different options a Tribal Nation may pursue to request a Presidential disaster declaration;</li> <li>Including a new graphic to highlight the two approaches available to Tribal Nations; and</li> <li>Reiterating the flexibility Tribal Nations have throughout the PDA process.</li> </ul>
		Chapter 2: Preliminary Damage Assessment Overview
7	148	Added the FEMA Templates and Resources callout box to list the references available to SLTT governments at FEMA.gov/PDA.
8	150	Updated Figure 3. PDA and Presidential Disaster Declaration Process Linkages to reflect the most recent process and requirements for each step.
9	153 - 162	Updated the Key Objectives of the PDA Process section to emphasize the importance of the PDA in collecting disaster data, aiding the state, Tribal Nation, or territorial (STT) government's declaration request, and providing a recommendation to the president for a disaster declaration.



Page	Line	Update
9 - 10	166	<ul> <li>Updated Table 1. Key Considerations for the PDA Process by:</li> <li>Expanding the Program Requirements to note: "Other types of federal assistance include FEMA Mitigation and Fire Management Assistance Grants and Small Business Administration (SBA) loans."</li> <li>Updating the Tribal Considerations description to provide an explanation of the unique considerations taken into account when a PDA is conducted with a Tribal Nation.</li> <li>Adding Environmental and Historic Preservation Considerations.</li> <li>Relocated the Readiness and Planning for Preliminary Damage Assessments</li> </ul>
10 - 11	167 - 174	section, removing it from the PDA process and emphasizing the importance taking steps to prepare for a PDA before an incident.
12 - 23	175 - 502	Created the PDA Process section by consolidating guidance from the PDA concept of operations. Other updates made throughout the new, consolidated section include:  Updating the list of steps in the PDA process to align to the current process;  Expanding on each of the five steps in the PDA process;  Adding Figure 4. PDA Process and Figure 5. The IDA Process to illustrate complex requirements;  Consolidating the step requiring local of tribal governments to send data to state/territory into the "STT Government Reviews Damage" step; and  Reorganizing the "STT Government and FEMA Conduct Joint PDA" section to clarify the distinction between steps and outline a linear process.
14	227 - 237	Added additional information to the IDA step to provide additional flexibility to STT governments based on the needs and capacity of the local government. Updates included noting that:  The local government or Tribal Nation may receive support from the state, the territory, or Non-Governmental Organizations (NGO);  The territorial government may conduct the IDA because it does not include a local government; and  The state may conduct the IDA in areas where the local government does not have the capacity to do so.
16 - 17	284	Added Table 3. Validation Methods for IA and PA Joint PDA Requests to summarize and consolidate common validation methods.



Page	Line	Update
17	297 - 318	Listed additional information requirements that the STT government is expected to provide when requesting a joint PDA, including:  The verified costs for each category of work;  Widespread loss of critical facilities (e.g., hospitals, grocery stores) and essential utilities and shortages of food, water, and medical supplies;  Summary of similar damage or repetitive damage from past events (declared or non-declared); and  Summary of underserved populations impacted by the event.
18	323 - 328	Added a new section providing guidance for disasters where the STT government elects not to request a joint PDA:  "In some cases, the STT government may complete the IDA and determine that the level of damage does not warrant a disaster declaration. If the STT government elects not to request a disaster declaration, it may consult with the FEMA Region to determine if there are programs managed by other federal agencies (OFA) that may support recovery operations. For additional information, refer to FEMA.gov/PDA."
18 - 19	343 - 368	Updated the list of information requirements for the joint PDA plan of action, including:  A strategy for managing inquiries from the media, developed with input from the Office of External Affairs (OEA);  A list of residential streets that are inaccessible;  A list of roads that have lost utilities services; and  A list of any mitigation opportunities;
19	369 - 378	Added additional guidance for incorporating data on underserved communities and geospatial data into the joint PDA plan of action: "This data may help ensure communities disproportionately impacted based on their pre-disaster vulnerability are prioritized in the assessment and PDA process. Additional demographic and geospatial data may better incorporate equity and environmental justice considerations into the joint PDA process and direct assessments toward these disproportionately impacted communities."
20 - 21	389 - 434	Updated and expanded the Joint PDA Team Conducts Damage Assessments section to clearly identify agencies and individuals involved in damage assessment field teams, the purpose of conducting the damage assessment, and how to validate damage in the field.
23	502	Added a new callout box detailing how the cumulative effect of recent disasters can be incorporated into an STT government's request for federal assistance.



Page	Line	Update		
23 - 31	503 - 590	Created the PDA Roles and Responsibilities section and consolidated guidance from other chapters under the new section heading. Other updates made throughout the new, consolidated section include:  Creating a new table to summarize the roles and responsibilities of the SLTT government, FEMA Regions, and the joint PDA team; Consolidating IA and PA-specific roles into the same table; and Adding roles and responsibilities for new positions, such as State, Tribal, or Territorial Government Geospatial and Data Analysis Lead, FEMA Environmental and Historic Preservation Specialist, FEMA Community Assistance Coordinator or Specialist, or FEMA Civil Rights Advisor.		
27	547 - 550	Clarified the role of the PDA coordinator and PDA team lead by adding: "The PDA coordinator is a regional role that oversees recovery program teams conducting IA and PA PDAs in the field. The PDA team leads report to the PDA coordinator and support the PDA coordinator's span of control by overseeing PDA team members, per NIMS guidelines."		
28	558	Added Figure 6. PDA Team Structure to outline the structure of the FEMA PDA team and illustrate the team's hierarchy.		
30	584 - 588	Provided additional information on the PDA coordinator by adding: "The RA and RRDD has a delegation of authority to appoint anyone they deem fit into the coordinator and team lead roles The FEMA PDA coordinator is a regional asset that reports to the FEMA Regional Recovery Division Director. The PDA coordinator oversees recovery program teams conducting IA and PA PDAs in the field."		
	Chapter 3: Joint PDA Methodologies			
32 - 38	591 - 817	Created a new Chapter 3: Joint PDA Methodologies to consolidate damage assessment methodologies for IA and PA into a single chapter.		
33	642 - 655	Added new validation methods, including digital surveys and remote validation tools, to incorporate guidance for new options and new technologies for SLTT governments to employ.		
35	702 - 734	Expanded on the overview of Virtual Sensing methodologies, describing additional capabilities, data types, aircraft systems, and sensing limitations.		
36 - 37	757 - 774	Expanded guidance for modeling tools to describe how HAZUS and the Prioritizing Operations Support Tool (POST) support damage assessments.		
Chapter 4: Individual Assistance Joint Preliminary Damage Assessments				
39	858 - 859	Added "How the Tribal Nations defines its community, as Tribal Nation responsibilities are not limited to Tribal Nation lands" as an additional disaster declaration factor for Tribal Nations.		
41 - 42	897	Added responsibilities for the Civil Rights Advisor and FEMA Environmental and Historic Preservation Specialist to Table 9. FEMA IA PDA Team Member Roles and Responsibilities.		



Page	Line	Update
43 - 48	906 - 1029	Reorganized the chapter to create a distinct Damage Levels section. Other updates made throughout the new, consolidated section include:  Adding guidance for collecting data to determine the damage level;  Describing how to distinguish between damage levels for conventionally built homes and manufactured homes; and  Converting bulleted lists of damage descriptions into Tables 11 – 15 to better organize the different damage levels and limit the formatting changes.
43	906	Updated the definition in the Essential Living Spaces callout box.
44	942 - 949	Added information outlining how the functionality of the damaged component of a home is considered when conducting the damage assessment.
45 - 48	968 - 1029	Removed references to detached carports, garages, and outbuildings as a factor for eligibility.
45 - 48	968 - 1029	<ul> <li>Updated the damage level descriptions for all housing types by:</li> <li>Adding requirements for structural damage,</li> <li>Adding requirements for damage to the foundation, and</li> <li>Updating the waterline requirements for flooding incidents.</li> </ul>
45	968	Removed the habitability standard for providing assistance to survivors in the Habitability callout box.
47	1009 - 1019	Added a list of extenuating conditions for flooding incidents that elevate minor damage to major damage, including:  Duration of the flood; Contaminants in the water; Waterline reached electrical outlets or essential heating, ventilating, and air conditioning (HVAC) or water systems; or Waterline in basement damages mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.).
48 - 49	1040 - 1051	Clarified how the cost of assistance is assessed by adding:  "The cost of assistance estimate is established by assessing and categorizing the degree of damage of disaster-impacted residences. This calculation is data driven, calculated with FEMA support, and is a combination of the two principal declaration factors. FEMA uses the PDA data to make informed and data driven decisions while projecting the cost of assistance. FEMA evaluates PDA data, including the number of damaged homes, the degree of damage, the rate of home ownership, the cause of damage, and insurance coverage.  Refer to the Individual Assistance Declarations Factors Policy for additional information on the cost of assistance calculation. State and Tribal Nations are responsible for the impact statement for the Presidential disaster declaration request package which includes an assessment of SLTT government capacity and resources and an assessment of the impacts of the disaster on the community."



Page	Line	Update
50	1090	Removed a paragraph describing how FEMA is prohibited from assisting communities that do not participate in the National Flood Insurance Program (NFIP) is the damage would have been covered by the program.
50	1091 - 1103	Consolidated the Assessing Available Resources section by removing the subsections that described how to consider STT government assistance programs, voluntary organization assistance, and the impact from the cumulative effect of recent disasters.
50 - 51	1115 - 1135	Consolidated the Documenting Relevant Impacts section by removing the subsections that described how to capture information related to:  Disaster-impacted population profile, Impacts to community infrastructure, Disaster-related deaths and injuries, Emergency sheltering information, Feeding operations information, Information related to distribution of emergency supplies, Individual client assistance (client casework) information, Information referral services, and Unique conditions that affect Tribal Nations.
51 - 52	1136 - 1158	Expanded the Impact Statements section to provide additional guidance on writing an impact statement and the basic components that they all should contain to adequately document the severity, magnitude, and impact of the event.
	Chapter	5: Public Assistance Joint Preliminary Damage Assessments
58	1267 - 1273	Expended the Identifying Damaged Facilities section to note that: "The PDA provides information that allows FEMA to identify opportunities for hazard mitigation. Section 1206 of the Disaster Recovery Reform Act (DRRA) defines the framework and requirements for consistent and appropriate implementation of the PA Program, one of the PA declaration factors. This policy provides communities with the resources they need 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."
59	1297 - 1302	Added the PDA System Reporting Application section to describe how the Reporting Application can be used to automatically calculate costs and develop a Site Estimate Summary.



Page	Line	Update		
59 - 60	1321 - 1330	Consolidated the Documenting Work and Cost section by removing the subsections that describe the general methods used to accomplish disaster-related work and estimate costs, including:  Labor (Force Account),  Equipment (Force Account),  Leased equipment,  Supplies,  Contract service,  Mutual aid agreements,  Repairs versus replacement, and  Landslides and slope stabilization.		
60	1334 - 1354	Updated the list of costs not considered based on updated examples included in the Public Assistance Program and Policy Guide.		
61	1380 - 1390	Simplified the Hazard Mitigation Projects section by removing the list of information that may be included in the impact statement.		
62	1391 - 1398	Added a new Localized Impacts section to describe how FEMA accounts for localized impacts when the statewide per capita impact is low.		
62	1399 - 1405	Simplified the Recent Multiple Disaster section to emphasize the 12-month timeline for considering and evaluating the effects of recent, multiple disasters.		
62	1406 - 1415	Added a new Per Capita Impact Calculations section to outline the new statewide and county per capita impact calculations.		
	Appendices			
D-4 - D-5	1868 - 1890	Expanded the guidance for identifying federal agencies before an incident in order to streamline their PA PDA process.		
D-6	1911 - 1939	Added a new PDA Operations in a Tribal Setting section to describe additional requirements FEMA must consider when conducting a PDA with a Tribal Nation.		
D-9	2023	Removed the eligibility requirements for individuals that are conventional homeowners and not a member of the Tribal Nation from Table 22. Tribal Housing and Eligibility for FEMA Assistance.		
D-10 - D- 11	2029 - 2041	Added a paragraph describing eligibility requirements for non-traditional housing and special considerations for traditional tribal dwellings, such as the cost calculation, repairs, and housing assistance.		
D-18	2200 - 2207	Added a new PDA Partners section to list the other federal agencies that may provide support for a Tribal Nation's PDA.		
D-19	2221 - 2239	Updated the Tribal Nations as a Pass-through Entity section by noting that FEMA assistance cannot be passed onto state or local governments and describing potential reimbursement options through mutual aid or resource sharing agreements.		



Page	Line	Update
D-20 - D- 21	2249 - 2285	Expanded the Cultural Sites and Items section by adding additional guidance on identifying damage to cultural sites and conducting inspections of cultural sites.
D-21	2286 - 2298	Added a new Restoration of Traditional Tribal Residential and Ceremonial Structures section to provide guidance on restoring traditional tribal structures based on cultural, historical, governmental, or ceremonial construct methods.
D-21 - D22	2299 - 2323	Added a new Cultural Considerations section to list additional steps the PDA team should take when conducting a PDA with Tribal Nation.
E-1	2324 - 2417	Updated Appendix E: Technology to reflect the current methods and technology that are utilized to conduct damage assessments.
F-1	2418 - 2424	Added updated versions of the PDA Narrative Report, the IA Street Sheet, and the PA Site Sheet.
G-1	2425 - 2427	Added the updated version of the IA home insurance matrix.
H-1	2429 - 2434	Added updated versions of the manufactured homes and conventionally-built homes damage matrixes.
I-1	2436 - 2439	Added an updated version of the Public Assistance Supporting Documentation Checklist.
J-1	2440 - 2442	Added the updated version of the Public Assistance Work Eligibility Matrix.
K-1	2444 - 2449	Added the updated versions of the PA work assessment matrices for Categories A, B, and C-G.

#### **Development Process**

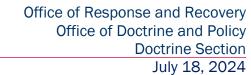
FEMA's Recovery Directorate has routinely updated the *PDA Guide* to ensure that it includes the most up-to-date guidance. The Recovery Directorate began updating the guide in May 2022 by soliciting input from internal subject matter experts and addressing internal revision priorities. To update the *PDA Guide*, the Recovery Directorate also:

- Hosted working groups with IA, PA, and tribal liaison stakeholders from June August 2022.
   The stakeholders provided input on iterative drafts following each working group meeting.
- Released the draft *PDA Guide* for Targeted Review in April 2023.
- Resumed development of the PDA Guide in December 2023 and coordinated with IA and PA stakeholders to incorporate recent policy or programmatic updates into the draft.
- Re-released the PDA Guide for Targeted Review from February 12 March 1, 2024.

#### **Next Steps**

To complete the update of the PDA Guide, the Recovery Directorate will:

Release the PDA Guide draft for a 30-day public comment period on July 22, 2024.





- Resume the concurrence process in August 2024 following the public comment period.
- Finalize and publish the updated PDA Guide in October 2024.