NATIONAL ENGAGEMENT

PLANNING CONSIDERATIONS: DISASTER HOUSING

September 12, 2019

FEMA’s National Integration Center is seeking feedback on the draft document *Planning Considerations: Disaster Housing*. Comments and recommendations received help ensure the final version of the guide is an effective resource for emergency managers across the nation.

The Planning Considerations: Disaster Housing document supplements Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans by providing guidance on national housing priorities, types of housing, key considerations, and housing-specific planning recommendations that state, local, tribal, and territorial jurisdictions can apply when developing or improving housing plans. This planning document is a tool for use in conjunction with the Six-Step Planning Process described in CPG 101.

Housing recovery is the cornerstone to a community’s resilience. By helping survivors achieve sustainable housing after a disaster, state and local leaders move their communities towards stability and improving resiliency for future incidents. Achieving widespread sustainable housing after a disaster is a determining factor in community’s ability to recover. To improve disaster housing capabilities across the Nation, states, tribes, territories, and local jurisdictions are encouraged to collaboratively work together, along with the Federal Government, private sector partners, and nongovernmental organizations to develop disaster housing plans.

When reviewing the document, consider:

- Identifying areas that may be confusing and need revision;
- Providing success stories or best practices associated with the disaster housing efforts, including those involving public-private sector collaboration; and
- Identifying additional job aides, training opportunities, or resources for inclusion in the document.

FEMA is hosting a series of 60-minute engagement webinars to describe the draft document and answer participants’ questions about providing feedback. The webinars will be open to the whole community.

To review the draft document, download the comment matrix, and for additional webinar information, please visit [https://www.fema.gov/plan](https://www.fema.gov/plan).

Please provide any comments, input, or recommendations by COB on October 15, 2019. Email feedback to [NPD-Planning@fema.dhs.gov](mailto:NPD-Planning@fema.dhs.gov).
Planning Considerations: Disaster Housing
# Table of Contents

Introduction.................................................................................................................................................. 1

Purpose ....................................................................................................................................................... 1

Audience ....................................................................................................................................................... 1

Background .................................................................................................................................................. 1

Housing Goals ............................................................................................................................................. 2

Disaster Housing Assistance .................................................................................................................. 3
  State Disaster Housing Programs and Resources .................................................................................. 3
  Federal Disaster Housing Assistance .................................................................................................... 3

Housing Phases .......................................................................................................................................... 5

Sheltering ................................................................................................................................................... 6

Interim Housing ....................................................................................................................................... 7

Permanent Housing .................................................................................................................................. 8

Housing Considerations ........................................................................................................................ 10

Regulations and Authorities .................................................................................................................... 10

Natural Environment ............................................................................................................................... 11

Infrastructure ........................................................................................................................................... 12

Population .................................................................................................................................................. 12
  Individuals with Access and Functional Needs .................................................................................... 12
  Homeless Populations ............................................................................................................................. 13
  Incarcerated Individuals .......................................................................................................................... 14
  Nursing and Senior Facilities .................................................................................................................. 14

Housing Availability ................................................................................................................................ 15

Contracting ................................................................................................................................................ 16

Host State Agreements ............................................................................................................................ 16

Wrap-Around Services ............................................................................................................................. 17

Housing Inspection .................................................................................................................................... 18

Public Information, Outreach, and Preparedness ................................................................................... 18

Housing Assistance Programs ............................................................................................................... 20

Developing a Disaster Housing Plan ....................................................................................................... 21

Step 1: Form a Collaborative Disaster Housing Planning Team ............................................................. 21

Step 2: Understand the Housing Situation ............................................................................................... 22

Step 3: Determine Housing Goals and Objectives ................................................................................ 24

Step 4: Housing Plan Development ....................................................................................................... 24
Step 5: Housing Plan Preparation, Review, and Approval ...................................................... 25
Step 6: Housing Plan Implementation and Maintenance ......................................................... 25

Glossary ................................................................................................................................... 27

Acronyms..................................................................................................................................29

Appendix A: Housing Assistance Programs .........................................................................31
State and Local Housing Assistance Programs........................................................................31
Federal Housing Assistance Programs .................................................................................... 32
Army Corps of Engineers (USACE). ..................................................................................... 32
Department of Agriculture (USDA) ....................................................................................... 33
Department of Health and Human Services (HHS) ............................................................. 34
Department of Housing and Urban Development (HUD) .................................................. 34
Department of Veterans Affairs (VA) ................................................................................... 35
Federal Emergency Management Agency (FEMA) ............................................................... 36
Small Business Administration (SBA) .................................................................................. 37

Appendix B: Authorities and References .............................................................................38

Authorities ................................................................................................................................ 38
References .................................................................................................................................. 39

Appendix C: Disaster Housing Planning Checklist ............................................................... 41
Step 1: Form the Collaborative Planning Team ................................................................. 41
Step 2: Understand the Housing Situation ............................................................................ 41
  Conduct Housing-Related Research and Analysis ............................................................... 41
  Planning Assumptions and Considerations ........................................................................ 41
Step 3: Determine Housing Goals and Objectives ............................................................... 44
Step 4: Housing Plan Development ...................................................................................... 45
  Purpose, Scope, Situation Overview, and Planning Assumptions ...................................... 45
  Concept of Operations ......................................................................................................... 45
  Direction, Control, and Coordination .................................................................................. 48
  Communications .................................................................................................................. 48
  Administration, Finance, and Logistics ................................................................................. 48
  Preparedness, Mitigation, and Recovery .............................................................................. 48
  Implementation, Maintenance, and Training ...................................................................... 49
  Authorities and References .................................................................................................. 49
Step 5: Housing Plan Preparation, Review, and Approval ...................................................... 49
Step 6: Housing Plan Implementation and Maintenance ......................................................... 49

Appendix D: Other Resources .................................................................................................50
Introduction

In the aftermath of disasters, communities often face situations that require creative short-term and long-term housing solutions for populations with different geographic and infrastructure challenges. Effectively moving survivors into post-disaster housing is a critical step toward long-term recovery. However, many jurisdictions do not have disaster housing plans, possibly due in part to the perception that housing is solely the Federal Government’s responsibility. Some housing programs are federally resourced, but they are state-managed and locally executed. Planning for disaster housing should occur at all levels of government.

“The optimal framework for response and recovery is one that is federally supported, state-managed, and locally executed.”

2018–2022 Federal Emergency Management Agency (FEMA) Strategic Plan

Purpose

This document supplements Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans. It provides guidance on national housing priorities, types of housing, key considerations, and housing-specific planning recommendations for state, local, tribal, and territorial (SLTT) jurisdictions to use, in conjunction with the Six-Step Planning Process described in CPG 101, to develop or improve disaster housing plans.¹

Audience

This document provides guidance to SLTT partners as they develop disaster housing plans and strategies for their communities. In many instances, a local or state emergency manager coordinates the development of a disaster housing plan with designated recovery leaders and appropriate housing subject matter experts from across the jurisdiction and private sector.

Background

Each community has unique characteristics, resources, cultural considerations, and demographics that impact the ability to rebuild homes and restore public services. SLTT jurisdictions should assess understand the risks that could displace individuals and households for long periods of time, the potential disaster housing needs of their communities, and their capability and capacity to help address those needs via sheltering, interim housing, or permanent housing solutions. SLTT governments should develop housing solutions and strategies that work for their residents and complement the overall housing market in the area.

2017 Hurricane Season Housing Figures

- The aftermath of Hurricane Harvey left nearly 75,000 homes with at least 18 inches of floodwater.
- Florida supported a peak of 191,764 people in nearly 700 shelters across the state.
- At its peak, Texas sheltered 42,399 survivors in congregate shelters, with approximately 1,403 survivors remaining in shelters 30 days after Hurricane Harvey made landfall.
- While FEMA programs supported Texas’ and Florida’s efforts to move most survivors out of shelters into interim housing within 60 days, shelter operations in Puerto Rico and the U.S. Virgin Islands extended past 90 days.
- By May 2018, nearly 4.8 million households affected by the 2017 hurricanes and California Wildfires registered for Federal assistance, more than the previous 10 years combined.

2017 Hurricane Season FEMA After-Action Report, July 12, 2018

The ability to comprehensively address the housing needs of disaster survivors routinely appears in annual National Preparedness Reports as an area for improvement, and other reports and studies have documented gaps in the Housing core capability. A 2012 survey by the Los Angeles Housing Department determined that most agencies and organizations in Southern California did not have housing recovery plans despite the impending threat of earthquakes in that area. More recently, after-action reports on disasters such as flooding, wildfires, and hurricanes continue to highlight ongoing gaps in delivering efficient and effective housing solutions for disaster survivors. These findings reinforce the importance of developing local disaster housing plans to better meet the diverse and complex needs of communities. To improve disaster housing capabilities across the Nation, SLTT jurisdictions should work collaboratively, in conjunction with regional partners, the private sector, nongovernmental organizations (NGOs), and the Federal Government, to develop disaster housing plans.

Housing Goals

Housing recovery is the cornerstone, often the linchpin, of a community’s recovery and ultimate resilience. By helping survivors achieve sustainable housing after a disaster, state and local leaders move their communities toward stability and resiliency for future incidents. Achieving widespread sustainable housing after a disaster helps determine a community’s ability to recover.

The National Disaster Housing Strategy establishes six national goals that create a common framework and provide a broad range of housing options to meet urgent needs following a disaster, enabling individuals, households, and communities to rebuild and meet their unique housing needs. These goals are guiding principles for SLTT jurisdictional-specific housing plans. The goals in the National Disaster Housing Strategy are:

1. Support individuals and communities in returning to self-sufficiency as quickly as possible.

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2. Define and fulfill fundamental disaster housing responsibilities and roles.
3. Increase our collective understanding and ability to meet the needs of disaster survivors and affected communities.\(^5\)
4. Build capabilities to provide a broad range of flexible housing options, including sheltering, interim housing, and permanent housing.
5. Better integrate disaster housing assistance with related community support services and long-term recovery efforts.
6. Improve disaster housing planning to better recover from disasters, including catastrophic events.

**Disaster Housing Assistance**

Consistent with the principles of the National Incident Management System, most incidents begin and end locally and typically require a unified approach from local agencies, the private sector, and NGOs. Some require additional support from neighboring jurisdictions or state governments. Regardless, each jurisdiction or state should leverage its own resources and programs to help displaced survivors find housing or move back into their homes.\(^6\) The following sections describe some state and Federal housing programs that can help local jurisdictions secure viable housing solutions for all members of the community.

### State Disaster Housing Programs and Resources

States have day-to-day housing responsibilities, but they also administer emergency housing programs. Many states implement these programs in conjunction with Federal assistance. Refer to Appendix A for more information on state and Federal housing assistance programs. Housing assistance also involves programs sponsored by or involving the private sector.

In addition, states coordinate resources and capabilities across jurisdictions to support local activities, obtaining additional support through interstate mutual aid and assistance mechanisms such as the Emergency Management Assistance Compact (EMAC).

### Federal Disaster Housing Assistance

The Federal Government can provide direct temporary housing and permanent housing construction to individuals or households only when all other housing options, including financial assistance for rent, transitional shelters, and relocation, have been exhausted or are

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\(^5\) The National Disaster Housing Strategy uses the term “disaster victims.” However, since publication of the document, the accepted term has changed to “disaster survivors.”

\(^6\) For the purposes of this document, “incident” includes planned events as well as emergencies and/or disasters of all kinds and sizes.
deemed unreasonable. Direct temporary housing assistance is limited to situations in which traditional financial options are insufficient to meet the needs of the affected populations.

A host of Federal programs and grants, sponsored by various agencies such as FEMA, the Department of Housing and Urban Development (HUD), the Department of Agriculture (USDA), and the Small Business Administration (SBA), are available to help disaster survivors obtain interim and permanent housing. Many of these programs have specific eligibility requirements; see the programs’ website links in Appendix A to review eligibility criteria.

Following a Presidential emergency or major disaster declaration, Emergency Support Function (ESF) #6—Mass Care, Emergency Assistance, Temporary Housing, and Human Services and the Housing Recovery Support Function (RSF) are the primary mechanisms to coordinate Federal disaster housing support. Through ESF #6, the Federal Government provides assistance to individuals for sheltering and temporary housing options including rental, repair, replacement, and loan assistance; temporary housing units and permanent housing construction; referrals; identification of accessible housing; and access to other sources of temporary housing assistance.

The Housing RSF supports and assists state and local governments in identifying resources—both human capital and financial—to help rehabilitate and reconstruct destroyed and damaged housing, including developing new accessible, permanent housing options. ESF #6 and the Housing RSF collaborate to provide the range of housing solutions. State and local planners should involve representatives from the Federal ESF #6 and the Housing RSF in the planning process to better understand Federal sheltering and disaster housing programs.

Disaster Recovery Reform Act (DRRA) of 2018

This legislation authorizes FEMA to issue grants to states, territories, and federally recognized tribes to implement direct assistance for temporary housing and permanent housing construction as part of a two-year pilot program.

Housing Phases

The nature and magnitude of an incident drives the size, scope, and scale of housing needs and the duration of assistance required. Planners should develop a range of housing assistance objectives to address the full spectrum of disasters, from smaller-scale incidents of short duration and concentrated impact to large-scale catastrophic incidents of widespread devastation that require long-term solutions. Housing plans should address the full range of potential incidents from natural disasters to terrorism incidents and manmade events. A good reference for all hazards should be in a state’s Threat and Hazard Identification and Risk Assessment\(^8\) or community hazard mitigation strategies.

A range of sheltering and interim housing options typically meet the housing needs for smaller-scale disasters. However, large-scale catastrophic incidents require extensive long-term reconstruction and rehabilitation to renew and revitalize the community and region. Some incidents, such as a radiological accident or catastrophic hurricane, may render an area uninhabitable for extended periods of time and require intensive advanced planning.

Housing solutions have three phases: sheltering, interim housing, and permanent housing (Figure 1). Planning for disaster housing solutions and recovery starts in the pre-incident period, otherwise known as steady state, when there is time for stakeholder engagement, research and analysis, and discussions on the viability of courses of action (COAs). Housing planning continues after an incident through response and recovery mission areas, when the COAs are tailored and operationalized based on the specifics of the incident.

As the disaster response and recovery progresses, multiple stakeholders work to help families in shelters find alternative housing arrangements.

- **Sheltering** is the shortest housing phase. It generally occurs in the days immediately before and after a disaster and provides survivors who are displaced from their homes with a place of safety to receive shelter, food, and other types of support. As disasters increase in size and

complexity, the number and type of shelters increases, along with the number of people in them. This typically results in long-term sheltering (i.e., more than two weeks).

- **Interim housing** is the intermediate period of housing assistance that covers the gap between sheltering and the return of disaster survivors to permanent housing.

- **Permanent housing** is the final housing phase, when disaster survivors move back into their repaired homes or attain another form of long-term housing. This can take several years.

**Sheltering**

NGOs work closely with local governments to plan and manage shelters that meet local needs. Sheltering may be preventative, such as accommodating individuals prior to a severe storm, or immediately following an incident. When required, additional support is provided by the state and, if necessary, by the Federal Government. In most cases, shelter residents return home within a short period of time or locate other housing on their own. However, in large-scale disasters, extended shelter stays may be required until individuals can either return home or transition to interim or permanent housing.

Shelters serve multiple purposes. They provide temporary refuge and offer a place for families and households to regroup, register for disaster assistance, and obtain updates regarding damages, casualties, and response and recovery efforts. Shelters also provide access to disaster recovery services to help meet the immediate needs of individuals and households while the community responds to the incident and begins the recovery process.

Major or catastrophic incidents require more intensive sheltering support. When the demand for shelters exceeds capacity or traditional shelters are not available, planners and emergency managers may need to use nontraditional sheltering options, such as tents, vacant buildings, dormitories, campgrounds, unused warehouses, or cruise ships. In these instances, not only will the number of people requiring shelter support be large, but extensive damage to structures and infrastructure will limit sheltering options and result in substantially longer shelter operational periods. The total demand for shelter services and the post-impact assessment of structures that meet shelter standards drive decisions on whether to use nontraditional shelters. Table 1 defines congregate and non-congregate sheltering options and provides examples of each type.

### Table 1: Sheltering Examples

<table>
<thead>
<tr>
<th>Shelter Type</th>
<th>Definition</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Congregate</td>
<td>Private or public facilities with large open spaces</td>
<td>• Pre-Existing Shelter Facilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Large Venue Sheltering (i.e., Mega-Shelters)</td>
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<tr>
<td></td>
<td></td>
<td>• Schools, Churches, Community Centers</td>
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<tr>
<td></td>
<td></td>
<td>• Retreats/Conference Centers</td>
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<tr>
<td></td>
<td></td>
<td>• Soft-Sided Survivor Support Camps</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Social Services Shelters (e.g., Homeless)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• All-Purpose Community Centers or Facilities</td>
</tr>
<tr>
<td>Non-Congregate</td>
<td>Locations where survivors are not grouped with others in large spaces</td>
<td>• Hotel, motel, Trailer</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Dormitories/Group Quarters and Other Vacant Institutional Facilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Cruise Ships, Recreational Vessels, Floating Hotels</td>
</tr>
<tr>
<td>Shelter Type</td>
<td>Definition</td>
<td>Examples</td>
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<td>----------------------</td>
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</tr>
<tr>
<td></td>
<td>● Recreational Vehicles</td>
<td></td>
</tr>
<tr>
<td></td>
<td>● Seasonal and Commercial Recreational Camps</td>
<td></td>
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<tr>
<td></td>
<td>● Family and Friends</td>
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</tr>
</tbody>
</table>

When a disaster impacts thousands of people in a single community, a large, congregate shelter (also known as a mega-shelter) may be the best way to serve them. A mega-shelter is an arena, stadium, convention center or similar very high-occupancy facility that can shelter an exceptionally large population of evacuees from a major disaster.\(^9\) Mega-shelters create a “little city” where evacuees have access to services such as medical care and pharmacies, postal services, legal services, day care, and places to power electrical devices.

Nontraditional shelters should be considered and discussed during the planning process, because they require additional monitoring and resources to address potential, unanticipated problems that could arise. Weighing the availability, benefits, and concerns for sheltering resources is an important part of disaster housing COA development.

**Interim Housing**

Interim housing is the intermediate phase of housing assistance that covers the gap between sheltering and the return of survivors to permanent dwellings. This phase provides displaced survivors with safe, habitable, and secure places to live with access to community services and the opportunity to begin the process of recovery. Interim housing assistance begins with financial assistance for rent, hotel or motel reimbursement, and home repairs or replacement, and for most incidents, this addresses most temporary housing requirements. Much of this assistance can be obtained through homeowners’ insurance policies, which should be stressed as the best and first line of recovery assistance. For more serious disasters, in which homes or communities are destroyed, damaged, or contaminated to such an extent that they are uninhabitable for an extended period, additional housing options are required.

Operational planning for interim housing begins immediately after an incident while survivors are still in shelters and builds off the concepts and COAs from pre-disaster plans. Interim housing can extend from weeks to months. In catastrophic or major incidents where the damage to housing infrastructure is substantial or in rural areas where rental housing is limited, this period may be many months.

Interim housing options vary depending on the nature of the incident. When infrastructure is not severely damaged and the number of individuals with needs is manageable, existing resources such as rental properties are the simplest and, in many ways the best, options. However, if the damage to the community’s infrastructure significant or the venue is rural and rental property is unavailable, more levels of government become involved and the complexity of solutions increases. In some instances, survivors may certain non-congregate shelter options (i.e., family and friends, hotel, motels, trailers) may represent the best interim housing option Table 2 provides for examples of interim housing.

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Table 2: Interim Housing Examples

<table>
<thead>
<tr>
<th>Examples</th>
<th>Examples</th>
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<tbody>
<tr>
<td>● Friends and Family</td>
<td>● Seasonal Rentals</td>
</tr>
<tr>
<td>● Hotel, Motel</td>
<td>● Manufactured Homes</td>
</tr>
<tr>
<td>● Commercial Space</td>
<td>● Recreational Vehicles</td>
</tr>
<tr>
<td>● Rental Units</td>
<td>● Temporary or Alternative Housing Units</td>
</tr>
<tr>
<td>● Unused Federal Residential Properties</td>
<td>● Vacant Apartment Buildings</td>
</tr>
<tr>
<td>● Seasonal Rentals</td>
<td>● Manufactured Homes</td>
</tr>
<tr>
<td>● Recreational Vehicles</td>
<td>● Temporary or Alternative Housing Units</td>
</tr>
<tr>
<td>● Commercial Space</td>
<td>● Vacant Apartment Buildings</td>
</tr>
</tbody>
</table>

Decisions made for interim housing may have substantial implications for long-term recovery, which is once again why it is imperative to appropriately document necessary decisions, roles and responsibilities, and authorities in a housing plan. Interim housing solutions require greater involvement of the whole community. As such, planning for interim housing COAs is complex and should involve many stakeholders.

Permanent Housing

The stress level of disaster survivors increases the longer they are without permanent housing. Therefore, the goal is to transition survivors from interim to permanent housing as quickly as possible. However, identifying permanent housing relies on many factors such as availability, financial resources, and alignment of individuals to housing with the appropriate accommodations. Table 3 includes some examples of permanent housing solutions.

Table 3: Permanent Housing Examples

<table>
<thead>
<tr>
<th>Examples</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Construction of Kit Homes</td>
<td>● Manufactured Housing</td>
</tr>
<tr>
<td>● Lease or Purchase of Single or Multi-Family Homes, Apartments, and Condominiums</td>
<td>● Panelized Housing</td>
</tr>
<tr>
<td>● Modular Housing</td>
<td>● Rehabilitated Single or Multi-Family Homes</td>
</tr>
</tbody>
</table>

Unlike sheltering and interim housing, permanent housing depends primarily on the personal decisions and financial ability of individuals before and after the incident.

- Renters must seek out available replacement rental housing in the community. The lack of available affordable rental housing in the community impacts their transition to permanent housing.
- Homeowners’ tasks are more complex; they should decide on one of several courses of action, coordinate with their insurance providers, and seek other financing as needed.
  - They need to decide whether they want to repair, rebuild, or possibly relocate, and local government decisions on land use, building and occupancy inspections and permits, and providing wrap-around or basic community services may guide their decisions. A jurisdiction can expedite homeowner transitions by identifying and incorporating local government decisions impacting permanent housing into their plan.
  - Money is required to repair or rebuild. Hopefully, homeowners have insurance, but insurance may not cover all rebuilding costs. Homeowners who are inadequately insured may be at higher risk of delays in achieving permanent housing.
Jurisdictions should incorporate information on applicable financial programs for homeowners into disaster housing plans to help planners understand the situation and develop COAs. For example, many states have a state housing finance agency that may have access to Federal resources such as the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) program, or low-income housing tax credit or other programs of that nature. Some states, such as Florida, operate a state housing trust fund for a variety of housing purposes, including rebuilding housing following an incident. States can also use general funds to support permanent housing, even if they do not have a housing trust fund. Most importantly, state, tribal, and territorial governments are the conduits for many of the Federal disaster housing programs, including preparedness grants, as well as a host of other programs offered by various Federal departments and agencies. Appendix A lists housing assistance programs.
Housing Considerations

Disaster housing plans vary by jurisdiction and the threats they face. Factors such as demographics, infrastructure, geography, topography, tourism levels, businesses, government programs, and jurisdictional rules and regulations all present unique challenges to jurisdictions and states. Housing planning has no “one size fits all” approach. Jurisdictions should examine lessons learned and best practices of other communities and incorporate those considerations, as appropriate, into their own plans. In addition, considerations evolve or grow as solutions transition from sheltering to interim housing to permanent housing. Thorough discussions on these considerations as part of the planning process is critical for the success of any COA.

The following section identifies some planning considerations for emergency managers and planning teams to factor into their disaster housing plans, along with examples of pertinent questions to help frame the planning discussion.

Regulations and Authorities

Various statutory authorities and policies provide the basis for disaster housing assistance and can impact the availability of housing and the development of permanent housing options:

- Laws, statutes, ordinances, and executive orders dictate the ability to reconstruct, repair, allocate, and issue disaster housing.
- Local zoning ordinances, environmental regulations, fire codes, limitations for building in floodplains or coastal barriers, and accessibility requirements must be taken into account.
- States, local governments, tribes, and territories may have unique authorities that impact their emergency response activities and disaster housing programs.
- Most Federal assistance is based on authorities provided by the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (the Stafford Act, 42 U.S.C. 5121, et seq.), the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), the Disaster Recovery Reform Act (DRRA), and those of other Federal departments and agencies.

Thorough research on the regulations and authorities that impact the implementation of disaster housing plans is critical to a plan’s viability, as each jurisdiction has unique laws and ordinances. For example, various HUD programs allow waivers of regulations following a Presidential Disaster Declaration. If waivers to regulations exist, then planners should document them, along with the process for obtaining them, to expedite their execution when needed. Engaging representatives from various local, state, and Federal government agencies in the planning process can help to identify regulations that could delay the ability to get displaced survivors into interim and permanent housing. Appendix B identifies a list of Federal laws, regulations, and waivers to consider when writing disaster housing plans.
Regulations and Authorities Questions to Consider

- What entities have regulatory or legislative responsibilities for disaster housing within the jurisdiction?
- What is the legal basis for mutual aid agreements to provide housing assistance?
- What health and safety protocols can impact return to, and occupancy of, homes and buildings?
- What codes and ordinances may need to be waived or suspended to support temporary housing solutions (e.g., placement of temporary housing units, distance from roadways, multiple temporary housing units on property, zoning, local flood damage prevention ordinances)?

Natural Environment

Geography is a key contributing factor to community vulnerability. Proximity to hazard-prone areas, such as coasts, floodplains, seismic zones, or potential contamination sites directly affects the number of people requiring housing assistance and the potential duration. Statistical and geographical information system (GIS)-based modeling approaches can assist planners in determining risk based on the natural environment. For example, Flood Insurance Rate Maps, storm surge models, hurricane wind and rain prediction models, and seismic risk approaches help planners predict the areas most likely to sustain damage during certain incidents, the population that will require housing assistance, and the likely types of assistance needed. In developing pre-disaster housing plans, local planners or emergency managers should consult existing GIS analysis of their region and incorporate the known topography challenges, culturally sensitive locations (e.g., tribal sacred grounds, historical sites), and other known environmental considerations into their COAs. In addition, jurisdictions can use FEMA’s Emergency Management Performance Grant to fund GIS analysis to help develop housing plans.

Natural Environment Questions to Consider

- Has the jurisdiction conducted GIS modeling to determine topography and assess impacts from hazards?
- What unique environmental risks in the jurisdiction could result in large numbers of displaced persons or challenges with rebuilding (e.g., coastal areas, floodplains, seismic zones)?
- Are any cultural or historical sites in the jurisdiction governed by specific regulations?
- Would any zoning regulations hinder the ability to rebuild in certain locations due to environmental considerations?
- Does the jurisdiction have high-risk flooding areas or Special Flood Hazard Areas?
- Are threatened or endangered species or other protected wildlife or plants present in any of the proposed locations where land-clearing activities may be required?
Infrastructure

The viability and resiliency of infrastructure directly correlates to a community’s resilience—personal homes, as well as businesses and services. Homes and businesses in flood zones, on earthquake faults, and on the coastline are more susceptible to certain types of disasters or emergencies. Public infrastructure and lifelines (e.g., water, power) are especially critical, as the loss of these assets impacts the ability of individuals to return to their communities in a timely manner. Poorly constructed or maintained buildings, inadequately maintained public infrastructure, commercial and industrial development, and certain types of housing stock all increase the vulnerability of the built environment. For example, code requirements for older buildings are in effect from when the structure was constructed, so they may be more susceptible to damage. Planners should consult recent land surveys, local development records, building permits, and census population data to obtain a better understanding of existing infrastructure and planned growth, based on forecasted changes to the total number of persons inhabiting their jurisdictions. This will help them more accurately document the disaster housing resources that may be required and any potential gaps in capabilities.

Infrastructure Questions to Consider

- What critical infrastructure (e.g., water/wastewater plants, healthcare systems, schools), if damaged, could impact the ability of individuals to return to their homes?
- What are the specific building codes to which structures need to be rebuilt?
- Do planners have access to a list of key public and private infrastructure partners (e.g., power providers, utility companies) on which the jurisdiction relies?

Population

The projected number of survivors requiring disaster housing assistance and their demographics are two of the largest planning factors that influence disaster housing plans. Densely populated areas require more disaster housing resources than rural areas. For example, areas along the Gulf Coast are likely to have a large number of displaced survivors during a hurricane, versus less-densely populated inland areas. For regions with considerable population fluctuation throughout the year (e.g., summer vacationers), planning to accommodate the larger anticipated displaced populations is a best practice. Certain demographic and social characteristics also significantly impact disaster housing plans for an area: age, acute medical needs, socioeconomic status, individuals with access or functional needs, survivors with limited English proficiency (LEP), immigrants, and seasonal tourists.

Individuals with Access and Functional Needs

The social vulnerability of communities affects sheltering, interim, and permanent housing choices and locations. When developing disaster housing plans, emergency managers should

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10 The Centers for Disease Control and Prevention (CDC) maintains a Social Vulnerability Index (SVI). The SVI uses U.S. Census data to determine the social vulnerability of a community. CDC defines social vulnerability as the
engage and collaborate with FEMA Regional Disability Integration Specialists, state-designated Disability Integration Coordinators, and members from across the community to obtain a better understanding of the needs of a community and the resources to shelter or house individuals for extended periods. Accessible resources, accommodations, and reasonable modifications are necessary to ensure housing plans and operations include individuals with access and functional needs. For example, survivors with access and functional needs often need to stay in proximity to their established support system, which restricts available accessible housing options. Refer to Appendix B for a list of the primary authorities that address accessibility requirements.

Advanced planning is essential to ensure equitable access and services for all survivors. Making general population shelters and interim housing accessible to those with access and functional needs may require additional items and services, such as:

- Communication assistance and services
- Transportation and personal care assistants
- Assistance with activities of daily living
- Crisis counseling
- Availability of food and beverages appropriate for individuals with dietary restrictions
- Medical support
- Provisions for service animals.

Planning and executing disaster housing solutions for individuals with access and functional needs requires a combined effort of government, private sector, and nonprofit agencies. Meeting with community partners, stakeholders, providers, and individuals with access and functional needs will enhance emergency planners’ and public health officials’ abilities to develop housing plans that successfully integrate those needs into their housing strategy. In addition, these collaboration efforts will help educate community members with access and functional needs about the importance of personal preparedness plans. A variety of resources for planners on access and functional needs is located at https://www.fema.gov/resources-people-disabilities-access-functional-needs.

Homeless Populations

Planners should also include the needs of their community’s homeless population in housing plans. For example, as part of the planning process, obtaining an estimate of the locality’s pre-disaster homeless population and services needed to transport and shelter or house them following a disaster is imperative for the community’s needs assessment. This requires engaging with the entity responsible for Adult Social Services in their community to get a better understanding of various government homeless assistance programs and their eligibility requirements.

resilience of communities when confronted by external stresses on human health, stresses such as natural or human-caused disasters, or disease outbreaks. Factors such as poverty, lack of access to transportation, and crowded housing impact social vulnerability. https://svi.cdc.gov/.

11 Individuals having access and functional needs may include, but are not limited to, people with disabilities, older adults, and individuals with limited English proficiency, limited access to transportation, and/or limited access to financial resources to prepare for, respond to, and recover from the emergency.
Some private sector programs may be able to provide temporary housing solutions while the homeless individuals look for a job and seek affordable housing. In addition, planners should also research available Federal programs designed to assist the homeless and incorporate these into the plan’s COAs as appropriate. For example, HUD’s Continuum of Care program and related network of service providers may be useful resources when developing the plan.

**Incarcerated Individuals**

Another population for consideration is the incarcerated. Prisons are subject to the same hazards as the public. Correctional facilities are responsible for the evacuation and housing of their resident population, due to issues such as security and detention for the safety of the incarcerated evacuees and protecting the public from potential escapees. Inmates are sheltered at like facilities as available—e.g., Federal-to-Federal, county-to-county. However, some county and state prisons provide “rent out” space to Federal prisoners. These arrangements are generally not in the scope of emergency planners, except to coordinate with them to ensure they have plans in place and do not need additional assistance from the local government.

The National Institute of Corrections commissioned guidance for responding to a variety of prison emergencies, including transportation needs, titled *A Guide to Preparing for and Responding to Jail Emergencies: Self-Audit Checklists, Resource Materials, Case Studies.*


**Nursing and Senior Facilities**

Healthcare and other skilled nursing or senior facilities are also responsible for developing emergency operations and contingency plans. Many individuals in senior living complexes or assisted living facilities can be relocated to general population shelters, but interim and permanent housing solutions must address specific requirements based on their medical needs. Unlike correctional facilities, these facilities often rely on assistance from the government to transport and relocate patients during disasters. Most healthcare facilities have memoranda of understanding (MOUs) to facilitate evacuation and temporary housing processes. Planners should factor in the resources and capability gaps needed to accommodate this segment of the local population. A good practice is for planners to follow up with nursing facilities to ensure their contingency plans are updated and contain information such as accessible transportations for evacuation to temporary and permanent housing locations.

**Population Questions to Consider**

- What are the most densely populated areas in the jurisdiction?
- Does the population for the jurisdiction fluctuate throughout the year (e.g., periods of the year where the tourist population increases)?
- What is the demographic breakdown of the jurisdiction? How current are the statistics?
- Which agencies within the jurisdiction provide services to the population with access and functional needs?
Planning Considerations: Disaster Housing

- What is the homeless population in the jurisdiction? Are there plans for sheltering or housing them following a disaster?
- What portion of the community receives pre-disaster housing assistance?
- What are the estimated numbers of the community’s homeowners and renters?
- How many hospitals or medical centers are in the jurisdiction? Do they have evacuation plans in place?
- Does the planning team have copies of evacuation plans for jails/prisons and medical centers?

**Housing Availability**

Following a catastrophic incident resulting in many displaced survivors, interim and permanent housing options may be limited. This could be a result of high housing demand prior to the incident, legal restrictions, or damage to pre-disaster alternative housing resources. It is imperative that emergency managers and planners maintain awareness of the current housing stock within their jurisdiction and identify temporary housing facilities prior to any incident. Engaging local developers, realtors, and entities such as the local Board of Realtors is one way that planners can start identifying potential housing solutions for their community. In some cases, jurisdictions can negotiate pre-disaster contracts with various rental or business communities to provide interim or permanent housing. This will alleviate the need to navigate legal requirements during the height of a response to an incident. Understanding the current housing stock in a community and identifying potential options for disaster housing are critical to determining the available resources as part of the planning process. A disaster housing plan should include a list of identified housing facilities and units as an appendix.

In addition, the planning team can discuss the possibility of issuing specific waivers for building codes or zoning ordinances to create additional temporary housing solutions. This is especially important for housing solutions that require delivery and installation. A best practice is to coordinate with local jurisdictions regarding existing building, zoning, floodplain management, codes, and regulations when working on the housing plan.

**Housing Availability Questions to Consider**

- What is the composition of the current housing stock (e.g., rentals, single family, multi-family, short-term occupancy)?
- What percentage of the housing inventory is accessible for people with access and functional needs?
- What percentage of the housing inventory allows household pets?
- Does the jurisdiction have temporary housing resources (e.g., temporary housing units, trailers)?
- What is the percentage of homeowners and renters in the area?
- What percentage of the housing inventory is non-primary residences?
- Are agreements in place for temporary housing solutions (e.g., with neighboring jurisdictions, colleges, hotels)?
Planning Considerations: Disaster Housing

Can building codes or zoning ordinances be waived to create additional temporary housing solutions? If so, what is the process for that?

Is there an inventory of potential areas that could support group sites?

Is there an inventory of available pads for lease?

Contracting

Contractors are a critical force-multiplier during any incident response. Local jurisdictions and states may consider establishing pre-positioned contracts with vendors to expedite access to housing resources following an incident. As part of the planning process, emergency managers should identify any existing pre-positioned contracts and discuss the need for additional advance contracts that could help obtain housing services and resources in a timely manner. This is particularly valuable for addressing housing needs following smaller-scale emergencies where Federal resources may not be available.

PKEMRA requires FEMA to identify and establish contracts prior to an incident for frequently requested goods and services. In 2017, FEMA had an inventory of 77 advance contracts and reported that it obligated about $2.3 billion on 57 of them for hurricane assistance—$890 million for Harvey, $459 million for Irma, and $945 million for Maria. Some commonly acquired products and services under these advance contracts were architect and engineering services, inspection services, and prefabricated buildings.12

State and local planners should reach out to their regional FEMA office to obtain more information or guidance on pre-positioned contracts.

Contracting Questions to Consider

What, if any, pre-positioned contracts exist in the jurisdiction for housing-related services?

If any exist, have they recently been reviewed for accuracy and currency?

If none exist, are there resource gaps where a contract should be considered?

What is the contract process that would be used to address housing needs?

Does the planning team understand the requirements for Federal acquisitions?

Host State Agreements

Through mutual aid agreements, SLTT jurisdictions provide disaster-related assistance to one another. This includes sheltering and housing displaced survivors from other jurisdictions or states. For example, Florida provided sheltering and temporary housing for evacuees from Puerto Rico following Hurricane Maria.

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Reimbursement to host states for their efforts is either through existing mutual aid agreements (e.g., EMAC), direct reimbursement from FEMA, or in response to a state’s request to FEMA under the Stafford Act.

Planners should identify any existing host state agreements already in place or consider establishing agreements with neighboring states during preparedness planning efforts to expand the capacity of available sheltering and interim housing options.

### Host State Questions to Consider

- Are any host state agreements already in place at the state or territory level?
- If not, should host state agreements be established?
- Does the agreement specifically address relocation of displaced individuals?
- Does the agreement specify procedures or limits to sharing information on displaced individuals (e.g., personally identifiable information)?

### Wrap-Around Services

Providing interim housing requires more than just providing structures. Individuals and households in a new neighborhood should be within reasonable access to community and “wrap-around” services (e.g., schools, fire and emergency services, grocery stores, healthcare, daycare, public transportation services, social services, employment counseling, veterinarians).

The National Disaster Housing Strategy identifies several planning assumptions for wrap-around services that emergency managers and planners should consider in their housing plans.

- Certain wrap-around services are fundamental, in that they meet a community’s basic needs for security, restoration of private sector life-support, and community connectivity.
- Providing wrap-around services expedites the individual/family recovery plans and the identification of a more permanent housing solution.
- To the extent possible, several wrap-around services may be met through assistance that enables and/or connects community nonprofit organizations’ abilities and interests in meeting the needs directly.  

### Wrap-Around Services Questions to Consider

- Have the wrap-around services and the agencies or organizations responsible for providing them been identified within the jurisdiction?

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Housing Inspection

Housing inspections are required to assess damages, estimate the value of lost property, and determine eligibility for certain disaster assistance programs. Following catastrophic incidents, the volume of damage inspections will likely exceed the capacity to perform these activities in a timely manner, as depicted in Table 4. This will delay the delivery of housing assistance to survivors.

In considering how to expedite housing inspections, planners should identify the existing pool of building inspectors and permitting officials available to support post-disaster repair and re-occupancy. Mutual aid assistance compacts such as EMAC are force multipliers for jurisdictions. Planners should include information on additional inspection resources in their disaster housing plans.

Table 4: Housing Inspections and Wait Times for Disasters (2005–2017)

<table>
<thead>
<tr>
<th>Disaster</th>
<th>Number of Inspections</th>
<th>Avg. Wait Time (Days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Katrina</td>
<td>1,385,329</td>
<td>35</td>
</tr>
<tr>
<td>Rita</td>
<td>623,635</td>
<td>27</td>
</tr>
<tr>
<td>Wilma</td>
<td>439,081</td>
<td>14</td>
</tr>
<tr>
<td>Sandy</td>
<td>343,003</td>
<td>7</td>
</tr>
<tr>
<td>Harvey</td>
<td>584,056</td>
<td>24</td>
</tr>
<tr>
<td>Irma</td>
<td>967,163</td>
<td>27</td>
</tr>
<tr>
<td>Maria</td>
<td>260,989</td>
<td>39</td>
</tr>
</tbody>
</table>

Housing Inspections Questions to Consider

- What entity is responsible for occupation and safety inspections?
- What are the available housing inspection resources within the jurisdiction?
- Does the state recognize certifications and licenses from other states?
- Are mutual aid agreements in place for additional housing inspectors?
- What ways can inspections be expedited (e.g., waivers)?
- What is the current waiting time to receive a certification of occupancy? Can this be expedited post incident?

Public Information, Outreach, and Preparedness

A critical aspect of preparedness and planning efforts is identifying and transmitting information that will help individuals and households prepare for displacement from their homes following an incident. Synchronized, proactive messaging, prior to and following an incident, encourages individuals and households to plan and react accordingly for displacement and helps alleviate some of the burden on the jurisdictions.

Part of the disaster housing planning process should include public outreach. Emergency managers, housing agencies, and public officials should ensure residents are aware of housing
resources and how to access them. For example, the State of Texas created a dedicated website for disaster housing resources following Hurricane Harvey (Figure 2).\textsuperscript{14}

Messaging about the importance of flood insurance, homeowners and rental insurance, or documentation of proof of ownership (e.g., deed, title, mortgage statement) can expedite disaster assistance. Jurisdictions and states should develop a communications strategy that includes preparedness activities and messaging in alternative formats, so everyone has access to information regarding services and assistance. This may include sharing existing tools such as fact sheets or checklists that a state or agency has already developed. For example, FEMA’s direct housing assistance website for Hurricane Harvey includes information on temporary and permanent housing for individuals and households.\textsuperscript{15} Planners can identify and even script messages on housing assistance as part of the planning process.

\begin{itemize}
\item What communication channels will communicate relevant information to the community?
\item Has disaster-housing-related messaging already been developed within the jurisdiction?
\item Who is responsible for releasing information to the public within a jurisdiction?
\item What community organizations can help amplify housing-related messaging?
\item Will a website be established to convey disaster-housing information? How would it be established and who will sustain it?
\item What is the protocol to synchronize messages between local, state, and Federal entities?
\end{itemize}

\textsuperscript{14} Texas Department of Housing and Community Affairs website. \url{https://www.tdhca.state.tx.us/texans.htm}.

\textsuperscript{15} FEMA Direct Housing Assistance website. \url{https://www.fema.gov/media-library/assets/documents/155389}. 

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{Figure_2.png}
\caption{State of Texas Housing Website}
\end{figure}
Housing Assistance Programs

Many government agencies and organizations have disaster housing responsibilities, capabilities, and resources. Local jurisdictions, businesses, and states provide the first line of housing assistance to affected individuals and households. As such, a variety of housing programs and resources exist at the state and local levels and do not require a Stafford Act declaration.

After a Presidentially declared disaster, Federal housing programs become available to the survivors and community to begin the recovery process, including programs administered by FEMA. This is beneficial because no single program can mitigate all disaster housing challenges; however, navigating the various programs, particularly those of the Federal Government, can be difficult because of their similarities.

State and local planners should have a broad knowledge of these programs, including their applicability, intended use, funding, population served, end-state, activation requirements, and authorities. Planners should ensure that their housing plans catalog the housing assistance programs and resources that are unique to their jurisdictions as well as the criteria and information for accessing them.

Appendix A provides examples of some state disaster housing programs and a high-level overview of various Federal programs that help survivors find interim and permanent housing.

See Annex 1 of the National Disaster Housing Strategy for more details on these programs.¹⁶

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Developing a Disaster Housing Plan

CPG 101 provides a standardized planning process for SLTT jurisdictions to develop housing plans that integrate and synchronize with existing operational and strategic planning products and efforts. This promotes consistency between plans and provides a familiar framework for stakeholders to engage and participate. Figure 3 depicts the Six-Step Planning Process.

The Pre-Disaster Recovery Planning Guide for Local Governments is another reference when developing a disaster housing plan. The housing capability transcends both response and recovery, and this document offers recovery-specific planning recommendations for planners. This section offers housing-related recommendations and best practices that SLTT jurisdictions should incorporate into the Six-Step Planning Process when developing disaster housing plans.

Step 1: Form a Collaborative Disaster Housing Planning Team

As previously noted, disaster housing responsibilities, capabilities, and resources involve a diverse array of organizations with varied missions and vested interests in providing disaster housing assistance. No single entity has the means to address the full spectrum of disaster housing challenges. In addition, jurisdictions are all unique, with different risks, demographics, and geographies and different levels of resources and capabilities to address disaster housing. Therefore, planners should identify the appropriate representatives from all levels of government, NGOs, and the private sector to participate in the planning process for a specific jurisdiction. It is important to understand what capabilities and expertise each stakeholder can bring to a whole community’s disaster housing solution.

In this step, planners establish the core and collaborative disaster housing planning teams:

The core planning team is a small group of planners or writers that takes input from the collaborative planning team and develops the products for the planning process. This group establishes the schedule, communicates with stakeholders, sets expectations, leads the planning process, and develops the actual draft.

To ensure transparency with the community, the collaborative planning team should be as broad as possible, including:

- Representatives from various government agencies at the jurisdictional, regional, state, and Federal levels that have a role in providing disaster housing or wrap-around services
- Non-profit organizations

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• Local land developers and builders
• Volunteer organizations
• Disability organizations
• Faith-based organizations
• Chambers of commerce
• Organizations representing the needs of children, seniors, people with access and functional needs, people with LEP, and historically underserved populations
• As appropriate, organizations representing culturally sensitive locations (e.g., tribal sacred grounds) and/or historical sites.

Table 5 provides additional examples of organizations that may be involved in disaster housing (these agencies and organizations will vary by jurisdiction). An expansive collaborative planning team establishes relationships that bring creativity and innovation to disaster housing planning.

Table 5: Example Participants for a Housing Collaborative Planning Team

<table>
<thead>
<tr>
<th>Government Organizations</th>
<th>Private Sector/Non-Profit Organizations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Local elected/appointed officials (e.g., mayors, city/county managers)</td>
<td>• American Red Cross</td>
</tr>
<tr>
<td>• Emergency management and public safety (Police/Fire/Emergency Medical Services)</td>
<td>• Volunteer organizations active in disaster (VOADs)</td>
</tr>
<tr>
<td>• Housing finance agency</td>
<td>• Non-profit organizations</td>
</tr>
<tr>
<td>• Public housing authorities</td>
<td>• Utility companies</td>
</tr>
<tr>
<td>• Building departments</td>
<td>• Commercial and residential construction developers</td>
</tr>
<tr>
<td>• Planning and zoning authorities</td>
<td>• Rental property representatives/associations</td>
</tr>
<tr>
<td>• Public works departments</td>
<td>• Realtors</td>
</tr>
<tr>
<td>• Health and social services departments</td>
<td>• Independent charities</td>
</tr>
<tr>
<td>• Floodplain management</td>
<td>• Education community (private)</td>
</tr>
<tr>
<td>• Environmental protection</td>
<td>• Advocacy organizations (access and functional needs, children, immigrant, homeless, racial/ethnic concerns)</td>
</tr>
<tr>
<td>• Department of Education</td>
<td>• Chambers of commerce</td>
</tr>
<tr>
<td>• Economic development (local and regional)</td>
<td>• Faith-based organizations</td>
</tr>
<tr>
<td>• Parks and Recreation</td>
<td>• Media outlets</td>
</tr>
<tr>
<td>• Historic preservation boards or commissions</td>
<td></td>
</tr>
<tr>
<td>• Americans with Disabilities Act (ADA) coordinators</td>
<td></td>
</tr>
<tr>
<td>• Military installations</td>
<td></td>
</tr>
<tr>
<td>• ESF #6 and Housing RSF representatives (FEMA, HUD, SBA, USDA, VA)</td>
<td></td>
</tr>
</tbody>
</table>

Step 2: Understand the Housing Situation

As noted in CPG 101, planners start the problem-solving process by conducting research and analysis on how a jurisdiction’s threats and hazards can create a potential for displaced survivors for long periods of time. Planners use pre-disaster housing inventories, populations, and services as their basis for developing housing solutions, but the impacts from the event is likely to make the post-disaster inventory differ significantly.
Know Your Community

The key to determining risks, impacts, and consequences is to know your community and understand what defines its identity. Using existing data from local planning documents or local community organizations, identify and map all community features, attributes, community makeup, people, and assets (e.g., social, political, financial, infrastructure, public and private sector, institutional).

Understanding these community features assists the hazard identification process and provides a thorough understanding of resources at the community’s disposal. Examine previous disasters and their impacts and communicate to the planning team any community insights from these previous disasters.

The first step to understanding a disaster housing scenario is to conduct focused research on a broad range of characteristics of a jurisdiction, such as the size, composition, and distribution of the population, as well as land use patterns, socioeconomic conditions, the local government, local cultural considerations, and businesses, community groups, infrastructure conditions, and other community resources. Leveraging housing data from local and national housing surveys such as the American Housing Survey (AHS)\(^\text{18}\) and the American Community Survey (ACS) can assist planners with this activity.\(^\text{19}\) The AHS assesses regional and national housing needs every two years and the ACS assesses general community data annually. In addition, many communities have some form of data integration center that collects and enhances information to support broader community decisions. The Greater New Orleans Data Center is an example of such an organization.\(^\text{20}\) Planners can access such data tools to better determine the disaster housing needs of their localities and states.

This step also includes obtaining knowledge about the various regulations and laws on options for disaster housing. One tool to elicit this data is a fact sheet or questionnaire distributed to the collaborative planning team that seeks information on a variety of issues and capabilities unique to their organizations. In addition, these team members can point the planners to existing resources or data specific to the jurisdiction. For example, health officials can provide data on various elements of the population, as well as which critical health services require restoration before interim housing structures are usable.

AHS: Conducted every two years by the Census Bureau for HUD, the AHS measures housing quality and costs over time, with a longitudinal sample cohort. The data obtained about residences and households provides valuable information that aids Federal, state, and local governments in planning to meet the housing needs of the Nation. The AHS covers the 50 states and Washington, DC.

ACS: Administered by the Census Bureau; collects data on an ongoing basis to provide communities with information for important decisions. The ACS covers the 50 states, Washington, DC, and Puerto Rico.

This is also an opportunity to assess the capabilities of the community and their broader network of resources. For example, research can help identify how many dormitory rooms would be available at local or regional institutions of higher learning, which new hotels or apartments are being developed, and which unused rental properties require repair.

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\(^{19}\) American Community Survey (ACS). [https://www.census.gov/programs-surveys/acs/data.html](https://www.census.gov/programs-surveys/acs/data.html).

\(^{20}\) The Greater New Orleans Data Center. [https://datacenterresearch.org](https://datacenterresearch.org).
When all research is complete, the core planning team analyzes the data to create a “scenario” that maximizes the requirements for sheltering and housing within a community. Based on the scenario, the planning team develops facts and assumptions pertaining to the housing mission.

**Step 3: Determine Housing Goals and Objectives**

Using information from the scenario in Step 2, the planning team considers how displaced survivors’ needs will evolve and identifies projected housing requirements. These requirements become the priorities and basis for establishing jurisdiction goals and objectives. Jurisdictions should reference the national disaster housing goals when establishing their housing goals and objectives. However, executives and elected officials of each jurisdiction may have additional goals or objectives based on the unique characteristics and vision of the community.

The core planning team develops a list of goals and objectives for disaster housing.

- **Goals** are broad, general statements that indicate the intended solution to the identified problems. They are what personnel and equipment resources are supposed to achieve.
- **Objectives** are specific and measurable and focus on actions carried out during the operation. They lead to achieving the goals and determining the actions that participants in the operation must accomplish. Translating objectives into actions is part of Step 4.

As goals and objectives are set, planners may identify more requirements that will feed into the development of COAs as well as the capability estimate (see Step 4).

### Example of a Disaster Housing Goal and Objectives

**Goal:** Identify any housing needs as individuals and households transition from interim to permanent housing.

**Objectives:**
- Decide which interim housing options will be best for the jurisdiction.
- Determine available resources.
- Identify necessary updates, amendments, or waivers to local building codes and zoning ordinances.
- Ensure availability of utilities and essential services, such as police and fire protection, school, childcare, medical facilities, and supermarkets, are available and accessible to households receiving interim housing assistance.
- Identify a range of physically and programmatically accessible housing options. Provide mechanisms to assist those with access and functional needs to live independent lives.

### Step 4: Housing Plan Development

In this step, the planning team develops operational COAs to achieve each objective. Given the complexity of disaster housing authorities, the planning team should establish a projected timeline for housing actions, ranging from sheltering through permanent housing. Using this timeline, planners can identify decision points and response actions required to achieve the objective or response goal (i.e., the desired end-state). The timeline also helps determine how much time is available or needed to complete a sequence of actions. This is particularly
important to help survivors moveout of shelters and to return to some level of normalcy as quickly as possible.

When developing COAs, there needs to be an understanding as to which organization(s) have responsibility for which actions and whether those actions depend on any decisions, legal authorities, or the completion of other tasks. In addition, some housing assistance programs have timelines established in law, regulations, or policies, which can include deadlines for applications, completion of work, developing administrative plans, program duration, or timelines for submitting extension requests or appeals.

After the selection of COAs, the planning team develops capability estimates that identify the capabilities and resources needed to accomplish tasks. Capability estimates help planners decide whether pursuing a COA is realistic and supportable. Once the estimates are completed, the planning team uses the information from Step 2 to identify existing resources and any gaps or shortfalls (in direct or indirect disaster housing capabilities, resources, authorities, or funding). Gaps are usually between the projected number of people requiring some form of housing assistance and the actual capacity to house them with existing resources. However, projecting actual housing needs has historically been a challenge—survivors make their own choices and the length of time it takes to deliver housing solutions may impact the participation rate.

At this juncture, the planning team should start identifying external housing capabilities (outside the jurisdiction—e.g., regional, Federal, NGO) that can fill some of the housing shortfalls. They should also discuss the need for mutual aid agreements, host state agreements, or waivers.

**Step 5: Housing Plan Preparation, Review, and Approval**

Once the core planning team develops a draft of the plan, representatives from the collaborative planning team should review and validate the content and potentially identify additional coordination points, functions, or resources.

Particularly, since roles and responsibilities for disaster housing support encompass many agencies and organizations, any errors or conflicts must be resolved and addressed prior to the plan’s approval and publication. Conducting at least one stakeholder engagement period is a best practice. Refer to CPG 101 for successful strategies to facilitate input from stakeholders.

After the review and adjudication of all comments, the collaborative planning team members should have an opportunity for a final review of the document to ensure that all critical omissions or errors are resolved. The lead planner or emergency manager then submits the plan to the appropriate executive decision-maker (which will vary by jurisdiction) for approval.

**Step 6: Housing Plan Implementation and Maintenance**

States typically convene housing task forces at their state emergency operations center (EOC) or a joint field office to implement the housing plan and identify actual housing solutions following an incident. During the planning process, emergency managers are encouraged to identify personnel to serve on an interagency housing task force.
Ideally, an exercise to test the viability of the housing COAs occurs prior to the plan’s approval, but that is not always the case. Therefore, the emergency manager should identify exercise and training opportunities for the plan as soon as possible following publication.

To help emergency managers determine the qualifications that specific housing roles require, jurisdictions and states can leverage the National Qualification System (NQS) disaster housing job titles and position task books. The NQS establishes standard minimum qualifications for specific incident-related positions to provide consistency across the Nation and support nationwide interoperability.21

Collaborative exercises should involve partners identified in the plan, to help familiarize them with the plan and solidify a practical understanding of processes, decision points, and delivery of capabilities. Tabletop exercises (TTXs) are useful tools for identifying potential resource shortfalls or weakness in the plan. Lessons learned from TTXs, other exercises, or trainings inform decisions by senior leaders to make changes to the plan. The Homeland Security Exercise and Evaluation Program (HSEEP) describes several types of exercises, from full scale to tabletop, in very specific terms. HSEEP guidance also provides other valuable information regarding the use of exercises as training. Emergency managers should consult HSEEP for additional information on exercises to test housing capabilities.22

Lessons learned from real-world incidents are critical inputs to plan revisions and housing solutions. These incidents, while unfortunate, offer an opportunity to assess existing plans and identify planning or resource gaps. Partners, such as the members of a Disaster Housing Task Force, can further refine housing plans and strategies based on the execution of existing plans in the face of a real-world incident.

A scheduled periodic review and revision of the housing plan is necessary to keep it current. The review should consider lessons learned from real-world incidents or exercises that included a disaster housing mission, new national policy, or significant changes within the jurisdiction, such as government reorganizations, housing booms, and demographics.

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Glossary

Access and Functional Needs: Individuals having access and functional needs may include, but are not limited to, people with disabilities, older adults, and individuals with limited English proficiency, limited access to transportation, and/or limited access to financial resources to prepare for, respond to, and recover from the emergency.

Agency: A government element with a specific function offering a particular kind of assistance.

Congregate Shelters: Private or public facilities with large open spaces, such as schools, churches, community centers, armories, or other similar facilities.

Course of Action (COA): An approach that accomplishes an objective or mission.

Emergency Operations Center (EOC): The physical location where the coordination of information and resources to support incident management (on-scene operations) activities normally takes place. An EOC may be a temporary facility or located in a more central or permanently established facility, perhaps at a higher level of organization within a jurisdiction.

Emergency Operations Plan (EOP): The ongoing plan maintained by various jurisdictional levels for responding to a wide variety of potential hazards. It describes how people and property will be protected; details who is responsible for carrying out specific actions; identifies the personnel, equipment, facilities, supplies, and other resources available; and outlines how all actions will be coordinated.

Emergency Support Function (ESF): The grouping of governmental and certain private sector capabilities into an organizational structure to provide capabilities and services most likely needed to manage domestic incidents.

Host State: A state that, by agreement with an impact-state or FEMA, is providing evacuation and sheltering support to individuals from another state.

Impact State: A state, territory, or tribe that has received a Presidential emergency or major disaster declaration.

Incident: An occurrence, natural or manmade, that necessitates a response to protect life or property. In this document, the word “incident” includes planned events as well as emergencies and/or disasters of all kinds and sizes.

Interim Housing: The intermediate period of housing assistance that covers the gap between sheltering and the return of disaster survivors to permanent housing. Generally, this period may span from the day after a disaster declaration through a period up to 18 months.

Jurisdiction: A political subdivision (e.g., municipality, county, parish, state, Federal) responsible for ensuring public safety, health, and welfare within its legal authorities and geographic boundaries.

Mega-Shelter: An arena, stadium, convention center, or similar very high-occupancy facility that is used to shelter an exceptionally large population of evacuees from a major disaster.
Non-Congregate Shelters: Locations where survivors are not grouped with others in large spaces (e.g., family, friends, trailer, hotel).

Nongovernmental Organization (NGO): A group that is based on the interests of its members, individuals, or institutions that is not created by a government; it may work cooperatively with government. Examples include faith-based groups, relief agencies, organizations that support people with access and functional needs, and animal welfare organizations.

Objective: A statement of an outcome to be accomplished or achieved. Incident objectives are used to select strategies and tactics. Incident objectives should be realistic, achievable, and measurable, yet flexible enough to allow strategic and tactical alternatives.

Permanent Housing: Safe, sanitary, and secure housing that can be sustained without continued disaster-related assistance.

Private Sector: Organizations and individuals that are not part of any governmental structure. The private sector includes for-profit and not-for-profit organizations, formal and informal structures, commerce, and industry.

Reasonable Modification: A structural change made to existing premises, occupied or to be occupied by a person with a disability, to afford such person full enjoyment of the premises.

Shelter: A place of refuge that provides life-sustaining services in a congregate facility for individuals who have been displaced by an emergency or a disaster.

Sheltering: Housing that provides short-term refuge and life-sustaining services for disaster survivors who have been displaced from their homes and are unable to meet their own immediate post-disaster housing needs.

State: Used in this document to include any U.S. state, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and any U.S. possession.

State-Administered Disaster Housing Task Force (DHTF): A permanent body that coordinates SLTT, Federal, nongovernmental, and private sector experts to identify and evaluate housing programs, resources, and capabilities as part of disaster housing planning.

Temporary Housing Unit: Manufactured housing, recreational vehicle, or other readily fabricated dwelling (e.g., pre-fabricated dwelling).

Wrap-Around Services: Infrastructure and additional essential services to address disaster-related needs of affected residents living in temporary housing sites. These services go beyond the physical need for housing or political subdivision of a state and typically include basic social services and access to utilities, transportation, grocery stores, and medical and employment facilities.
Acronyms

ACS American Community Survey
ADA Americans with Disabilities Act
AHS American Housing Survey
CDBG Community Development Block Grant
CDBG-DR Community Development Block Grant – Disaster Recovery
COA Course of Action
CPG Comprehensive Preparedness Guide
CSBG Community Services Block Grant
DHTF Disaster Housing Task Force
DRRA Disaster Recovery Reform Act
EMAC Emergency Management Assistance Compact
EO Executive Order
EOC Emergency Operations Center
EOP Emergency Operations Plan
ESF Emergency Support Function
FEMA Federal Emergency Management Agency
FHA Federal Housing Administration
FTH First-Time Homebuyer
GIS Geographic Information System
HHS Department of Health and Human Services
HMGP Hazard Mitigation Grant Program
HOME HOME Investment Partnerships Program
HSEEP Homeland Security Exercise Evaluation Program
HSPD Homeland Security Presidential Directive
HUD Department of Housing and Urban Development
LEP Limited English Proficiency
903 NFIP National Flood Insurance Program
904 NGO Nongovernmental Organization
905 NQS National Qualification System
906 PKEMRA Post-Katrina Emergency Management Reform Act
907 RSF Recovery Support Function
908 SBA Small Business Administration
909 SHIP State Housing Initiatives Partnership
910 SLTT State, Local, Tribal, and Territorial
911 TTX Tabletop Exercise
912 USACE Army Corps of Engineers
913 USDA Department of Agriculture
914 VA Department of Veterans Affairs
Appendix A: Housing Assistance Programs

State and Local Housing Assistance Programs

The composition of governments in each SLTT jurisdiction differs. As a result, disaster housing programs vary across each jurisdiction. Some states and jurisdictions have dedicated housing assistance programs or resources in addition to those supplied by the Federal Government. Table 6 provides some examples of state housing programs.

As part of the planning process, planners should understand the disaster housing programs at the local, state, and Federal levels, along with their purpose, scope, and eligibility requirements.

Table 6: Examples of State Disaster Housing Programs

<table>
<thead>
<tr>
<th>State</th>
<th>Program</th>
<th>Purpose</th>
<th>Link</th>
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</thead>
<tbody>
<tr>
<td>Florida</td>
<td>State Housing Initiatives Partnership (SHIP)</td>
<td>Provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multi-family housing for very low, low, and moderate-income families. SHIP may fund emergency repairs, new construction, rehabilitation, down payment and closing costs, impact fees, construction and gap financing, mortgage buy-downs, acquisition of property for affordable housing, matching dollars for Federal housing grants and programs, and homeownership counseling.</td>
<td><a href="https://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program">https://www.floridahousing.org/programs/special-programs/ship---state-housing-initiatives-partnership-program</a></td>
</tr>
<tr>
<td>Maryland</td>
<td>Maryland Disaster Housing Assistance Program</td>
<td>Provides short-term, emergency rental assistance for families or individuals displaced by a natural disaster, as identified by the Maryland Emergency Management Agency or the Maryland Department of Human Resources, while the voucher recipient arranges for long-term housing or awaits permanent housing assistance.</td>
<td><a href="http://www.dhcd.maryland.gov/Communities/Documents/TenantParticipationFactSheet.pdf">www.dhcd.maryland.gov/Communities/Documents/TenantParticipationFactSheet.pdf</a></td>
</tr>
<tr>
<td>Massachusetts</td>
<td>Massachusetts Accessible Housing Registry Program</td>
<td>Helps people with disabilities find rental housing in Massachusetts, primarily accessible and barrier-free housing.</td>
<td><a href="http://www.massaccesshousingregistry.org/">http://www.massaccesshousingregistry.org/</a></td>
</tr>
</tbody>
</table>
Federal Housing Assistance Programs

The following sections summarize major Federal programs by department or agency that provides, or helps provide, sheltering or interim or permanent housing for individuals or households affected by a major disaster. These programs help individuals and households return to their pre-disaster state of sustainable, self-sufficient housing. More details on these programs are in the National Disaster Housing Strategy Annex 1: Overview of Disaster Housing Programs for Federal, State, Tribal, and Local Government and Nongovernmental Organizations.23

Army Corps of Engineers (USACE)

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation Blue Roof</td>
<td>Provides homeowners in disaster areas with fiber-reinforced sheathing to cover their damaged roofs until arrangements can be made for permanent repairs.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.usace.army.mil/Media/Fact-Sheets/Fact-Sheet-Article-View/Article/475463/temporary-roofing/">https://www.usace.army.mil/Media/Fact-Sheets/Fact-Sheet-Article-View/Article/475463/temporary-roofing/</a></td>
</tr>
</tbody>
</table>

### Table 8: USDA Disaster Housing Programs

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Loan and Loan Guarantee Programs</td>
<td>Provides qualified applicants the opportunity to acquire, build, rehabilitate, improve, or relocate dwellings in rural areas. Borrowers may either obtain direct loans from USDA or from private lenders that are guaranteed by USDA.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://usdamortgagehub.com/usda-502-guaranteed-or-direct-loan/">https://usdamortgagehub.com/usda-502-guaranteed-or-direct-loan/</a></td>
</tr>
<tr>
<td>Farm Labor Housing Loans and Grants</td>
<td>Helps develop housing for farm workers through direct loans and grants.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.rd.usda.gov/programs-services/farm-labor-housing-direct-loans-grants">https://www.rd.usda.gov/programs-services/farm-labor-housing-direct-loans-grants</a></td>
</tr>
<tr>
<td>First-Time Homebuyers (FTH) Program</td>
<td>Provides incentives such a 0% down payment, lenient qualifications, and low mortgage insurance to incentivize FTH in rural areas as defined by USDA. A borrower who hasn’t owned a home in the past three years may also qualify for an FTH loan.</td>
<td>Standing program</td>
<td><a href="https://www.usdaloans.com/program/first-time-homebuyers/">https://www.usdaloans.com/program/first-time-homebuyers/</a></td>
</tr>
<tr>
<td>Multi-Family Housing Rental Assistance Program</td>
<td>Makes rental assistance payments to owners of rental housing whose houses are uninhabitable due to a disaster. Eligible tenants pay no more than 30% of their income in rent.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.rd.usda.gov/programs-services/multi-family-housing-rental-assistance">https://www.rd.usda.gov/programs-services/multi-family-housing-rental-assistance</a></td>
</tr>
<tr>
<td>Rural Rental Housing Guaranteed Loans</td>
<td>Enables developers to provide multi-family housing for the elderly, individuals with a disability, and families who cannot afford the purchase price and maintenance costs of their own homes. Borrowers may obtain loans from private lenders to finance multi-family housing in rural areas, and USDA guarantees to pay for the lender losses in case of borrower default.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.hud.gov/sites/documents/19565_515_RURALRENTAL.PDF">https://www.hud.gov/sites/documents/19565_515_RURALRENTAL.PDF</a></td>
</tr>
<tr>
<td>Single-Family Housing Repair Loan and Grant Program</td>
<td>Provides very low-income rural homeowners with direct loans to repair their homes.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants">https://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants</a></td>
</tr>
</tbody>
</table>
### Department of Health and Human Services (HHS)

**Table 9: HHS Disaster Housing Programs**

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Services Block Grants (CSBG)</td>
<td>Provides block grants to states, U.S. territories, and federally recognized Native American tribes following disasters, who then distribute the monies to community action agencies and other organizations serving low-income populations.</td>
<td>Any disaster, regardless whether there is a presidential emergency or major disaster declaration</td>
<td><a href="https://www.acf.hhs.gov/ocs/programs/csbg">https://www.acf.hhs.gov/ocs/programs/csbg</a></td>
</tr>
<tr>
<td>Social Services Block Grants</td>
<td>Provides block grants to states, U.S. territories, and federally recognized Native American tribes following disasters for the provision of social services to low-income populations.</td>
<td>Upon passage of a supplemental appropriations bill following a disaster</td>
<td><a href="https://www.acf.hhs.gov/ocs/programs/ssbg">https://www.acf.hhs.gov/ocs/programs/ssbg</a></td>
</tr>
</tbody>
</table>

### Department of Housing and Urban Development (HUD)

**Table 10: HUD Disaster Housing Programs**

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Development Block Grants (CDBG)</td>
<td>Funds local community development activities such as affordable housing, economic revitalization, public services, and infrastructure restoration.</td>
<td>Ongoing program funded by annual appropriation to HUD</td>
<td><a href="https://www.hudexchange.info/programs/cdbg/">https://www.hudexchange.info/programs/cdbg/</a></td>
</tr>
<tr>
<td>Community Development Block Grants – Disaster Recovery (CDBG-DR)</td>
<td>Often utilized as a distribution mechanism for disaster recovery funds made available by Congressional supplemental appropriations.</td>
<td>Supplemental appropriations made by Congress following a Presidential disaster declaration</td>
<td><a href="https://www.hudexchange.info/programs/cdbg-dr/">https://www.hudexchange.info/programs/cdbg-dr/</a></td>
</tr>
<tr>
<td>FHA Mortgage Insurance for Disaster Victims – Section 203(h)</td>
<td>Provides insurance for mortgages made by qualified lenders to victims of a major disaster who have lost their homes and are in the process of rebuilding or buying another home.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.hud.gov/program_offices/housing/sfh/ins/203h-dft">https://www.hud.gov/program_offices/housing/sfh/ins/203h-dft</a></td>
</tr>
<tr>
<td>FHA Rehabilitation Mortgage Insurance – Section 203(k)</td>
<td>Helps those who have lost their homes by insuring a single, long-term, fixed, or adjustable rate loan that can cover both the acquisition and rehabilitation of a property that is at least a year old.</td>
<td>Any disaster, regardless whether there is a presidential emergency or major disaster declaration</td>
<td><a href="https://www.hud.gov/program_offices/housing/sfh/203k">https://www.hud.gov/program_offices/housing/sfh/203k</a></td>
</tr>
</tbody>
</table>
### Department of Housing and Urban Development (HUD)

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOME Investment Partnerships Program</td>
<td>Annual formula grants to participating jurisdictions that allow states and localities to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing or provide direct rental assistance to low-income people.</td>
<td>Standing program</td>
<td><a href="https://www.hud.gov/program_offices/comm_planning/affordablehousing/programs/home/">https://www.hud.gov/program_offices/comm_planning/affordablehousing/programs/home/</a></td>
</tr>
<tr>
<td>HUD-Owned Homes</td>
<td>Allows HUD to sell or lease homes it owns at a discount to survivors displaced by disasters.</td>
<td>No formal activation; case-by-case basis</td>
<td><a href="https://www.hudhomestore.com/Home/Index.aspx">https://www.hudhomestore.com/Home/Index.aspx</a></td>
</tr>
<tr>
<td>Loss Mitigation Program for FHA Homeowners</td>
<td>Incorporates a process to avoid foreclosures where lenders assist borrowers who have been unable to make loan payments and are in danger of defaulting on their loans.</td>
<td>At the discretion of the Secretary of HUD</td>
<td><a href="https://www.hud.gov/program_offices/housing/sfh/nsc/lossmit">https://www.hud.gov/program_offices/housing/sfh/nsc/lossmit</a></td>
</tr>
<tr>
<td>Public Housing Capital Funds</td>
<td>Makes improvements that benefit public housing residents, who are predominantly families and elderly people with incomes below 50 percent of the HUD-adjusted median income in their area.</td>
<td>No formal activation; case-by-case basis</td>
<td><a href="https://www.hud.gov/hudprograms/philcapfund">https://www.hud.gov/hudprograms/philcapfund</a></td>
</tr>
</tbody>
</table>

### Department of Veterans Affairs (VA)

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>VA Home Loans</td>
<td>Helps veterans, certain Service personnel (including certain Reservists and Guard members), and certain unmarried surviving spouses of veterans obtain credit to buy, build, or improve homes.</td>
<td>At the discretion of the VA Secretary following a presidential emergency or major disaster declaration</td>
<td><a href="https://benefits.va.gov/homeloans/">https://benefits.va.gov/homeloans/</a></td>
</tr>
<tr>
<td>Temporary Housing for Disaster Victims</td>
<td>Develops and maintains plans to make housing assets that are habitable, to which VA has title and possession, available for use by survivors in catastrophic disasters.</td>
<td>At the discretion of the VA Secretary following a presidential emergency or major disaster declaration</td>
<td><a href="https://www.fema.gov/media-library-data/1470149820826-7bcf80b5dbabe158953058a6b5108e98/ESF_6_MSscare_20160705_508.pdf">https://www.fema.gov/media-library-data/1470149820826-7bcf80b5dbabe158953058a6b5108e98/ESF_6_MSscare_20160705_508.pdf</a></td>
</tr>
</tbody>
</table>
**Federal Emergency Management Agency (FEMA)**

Table 12: FEMA Disaster Housing Programs

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cora C. Brown Fund</td>
<td>Helps meet disaster-related needs that have not or will not be met by governmental agencies or any other organization.</td>
<td>Presidential declared major disaster or emergency not caused by or attributable to war</td>
<td><a href="http://www.federalgrantswire.com/cora-brown-fund.html">http://www.federalgrantswire.com/cora-brown-fund.html</a></td>
</tr>
<tr>
<td>Essential Assistance (Section 403)</td>
<td>Supports and augments state and local sheltering resources for the affected population. Assistance is available to a broad population and not subject to eligibility or demographic restrictions.</td>
<td>Presidential emergency or major disaster declaration</td>
<td>[<a href="https://www.fema.gov/media-library-data/1519395888776-af5f95a1a9237302af7e3fd5b0d07d71">https://www.fema.gov/media-library-data/1519395888776-af5f95a1a9237302af7e3fd5b0d07d71</a> StaffordAct.pdf](<a href="https://www.fema.gov/media-library-data/1519395888776-af5f95a1a9237302af7e3fd5b0d07d71">https://www.fema.gov/media-library-data/1519395888776-af5f95a1a9237302af7e3fd5b0d07d71</a> StaffordAct.pdf) (page 27)</td>
</tr>
<tr>
<td>Federal Assistance to Individuals and Households - Housing Assistance Provision (Section 408)</td>
<td>Provides interim housing with some sheltering and permanent housing applications. Available to individuals and households whose primary residences are in a Presidentially declared major disaster area where individual assistance is designated.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.fema.gov/news-release/2018/05/17/4362/fact-sheet-frequently-asked-questions-about-fema-individual-assistance">https://www.fema.gov/news-release/2018/05/17/4362/fact-sheet-frequently-asked-questions-about-fema-individual-assistance</a></td>
</tr>
<tr>
<td>Hazard Mitigation Grant Program (HMGP)</td>
<td>Provides grants to state and local governments who implement long-term hazard mitigation measures that will reduce the loss of life and property due to natural disasters.</td>
<td>Presidential emergency or major disaster declaration</td>
<td><a href="https://www.fema.gov/hazard-mitigation-grant-program-new">https://www.fema.gov/hazard-mitigation-grant-program-new</a></td>
</tr>
<tr>
<td>Individuals and Households Program (Financial Assistance and Direct Assistance)</td>
<td>Provides financial and direct assistance to eligible individuals and households affected by a disaster who have uninsured or underinsured necessary expenses and serious needs. Financial assistance funds temporary housing, home repair, and replacement. Direct assistance provides housing options to disaster survivor applicants. Programs may include multi-family lease and repair, transportable temporary housing units, direct lease, and permanent housing construction.</td>
<td>Presidential emergency or major disaster declaration.</td>
<td><a href="https://www.fema.gov/media-library/assets/documents/24945">https://www.fema.gov/media-library/assets/documents/24945</a></td>
</tr>
</tbody>
</table>
### National Flood Insurance Program (NFIP)

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Flood Insurance Program</td>
<td>Enables individuals to purchase insurance against losses from physical damage or loss of buildings and/or contents.</td>
<td>Standing program</td>
<td><a href="http://www.fema.gov/business/nfip/">http://www.fema.gov/business/nfip/</a></td>
</tr>
</tbody>
</table>

### Small Business Administration (SBA)

#### Table 13: SBA Disaster Housing Program

<table>
<thead>
<tr>
<th>Program</th>
<th>Purpose</th>
<th>Activation</th>
<th>Link</th>
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</thead>
<tbody>
<tr>
<td>Disaster Loan Assistance</td>
<td>Provides low-interest, fixed-rate loans to disaster victims, enabling them to repair or replace property damaged or destroyed in declared disasters.</td>
<td>At the discretion of SBA Administrator or following a presidential emergency or major disaster declaration.</td>
<td><a href="https://disasterloan.sba.gov/ela/Information/Inde">https://disasterloan.sba.gov/ela/Information/Inde</a></td>
</tr>
</tbody>
</table>
Appendix B: Authorities and References

Authorities

Each SLTT jurisdiction has unique statutes and policies that govern their housing activities. The authorities portion of this appendix focuses on Federal authorities that jurisdictions and states should consider when developing their disaster housing plans. NOTE: This list is not exhaustive.


- **Americans with Disabilities Act (ADA), Public Law 101-338, as amended. 42 U.S.C. § 12101**: Prohibits discrimination on the basis of a disability; defines a person with a disability as an individual who has a physical or mental impairment that substantially limits one or more major life activities. All federally funded programs must be ADA compliant.

- **Architectural Barriers Act, as amended, 42 U.S.C. § 4151 et seq.**: Requires that all buildings and facilities designed, constructed, or altered with Federal funds, or leased by a Federal agency, comply with Federal standards for physical accessibility (requirements are limited to architectural standards in new and altered buildings and in newly-leased facilities). Federal funds that provide shelter or interim or permanent housing after a disaster must comply with this act.

- **Civil Rights Act of 1964, Title VI, Public Law 88–352**: Prohibits discrimination on the basis of race, color, and national origin by recipients of Federal financial assistance.


- **Executive Order (EO) 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations**: Directs Federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations with the goal of achieving environmental protection for all communities.

- **EO 13166 – Improving Access to Services for Persons with Limited English Proficiency**: Requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP people have meaningful access to them.

- **EO 13347 – Individuals with Disabilities in Emergency Preparedness**: Ensures that the support needed by individuals with disabilities is integrated into the development and implementation of emergency preparedness plans by Federal, SLTT governments, and private organizations.
- Federal Aviation Administration Reauthorization Act of 2018 (Disaster Recovery Reform Act of 2018), Public Law 115-2524: Acknowledges the shared responsibility of disaster response and recovery and aims to reduce the complexity of FEMA and build the Nation’s capacity for the next catastrophic event. The law contains more than 50 provisions that require FEMA policy or regulation changes for full implementation, as they amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act

- Flood Disaster Protection Act of 1973, Public Law 93-234: Mandated the purchase of flood insurance to protect property located in Special Flood Hazard Areas.


- International Code Council: International Residential Code, 2018: Used by most states and local jurisdictions (after local adoption) for the design, construction, materials, and use and occupancy of one- to four-unit residential structures. Communities may have adopted earlier versions of this code. For larger residential and all non-residential buildings, the International Building Code would govern, when locally adopted.


- National Flood Insurance Act of 1968, 42 U.S.C. 4001 et seq.: Established NFIP, an insurance alternative to disaster assistance to meet the escalating costs of repairing damage to buildings and their contents caused by floods.

- Pets Evacuation and Transportation Act of 2006, Public Law 109-308: Amended the Stafford Act to require state and local emergency preparedness operational plans to address the needs of individuals with household pets and service animals following a major disaster or emergency.

- Post-Katrina Emergency Management Reform Act, Public Law 109–295: Amended the Stafford Act with several important provisions, including that after a major disaster or emergency declaration, accelerated Federal assistance could be sent by FEMA in the absence of a specific request by a state.

- Rehabilitation Act of 1973, 29 U.S.C. § 701: Section 504 prohibits discrimination on the basis of disability in any program or activity that receives Federal financial assistance, including federally subsidized housing programs.

- Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended, 42 U.S.C. § 408(c): Enables the Federal government to assist states affected by a disaster to expedite the rendering of aid and emergency services and the reconstruction of devastated areas. It provides statutory authority for most Federal disaster response activities, especially as they pertain to FEMA programs, including disaster housing.

References

This section includes references to documents and websites cited throughout this guide.


• Community Development Block Grant Disaster Recovery Assistance. HUD. https://www.hud.gov/hudprograms/disaster-recovery.


• HOME Investment Partnerships Program. HUD. https://www.hud.gov/program_offices/comm_planning/affordablehousing/programs/home/.


Appendix C: Disaster Housing

Planning Checklist

The following checklist is a tool for emergency planners to help develop their disaster housing plan. The checklist follows the suggested EOP format defined in CPG 101.

Step 1: Form the Collaborative Planning Team

- Create a work plan for the effort.
- Identify governmental, private sector, and NGO entities with responsibilities or equities for developing housing solutions.
- Identify members of the core and collaborative planning teams.
- Conduct a kickoff meeting to establish the timeline, milestones, and expectations.
- Determine whether these same members will participate in a housing task force to execute the plan.

Step 2: Understand the Housing Situation

Conduct Housing-Related Research and Analysis

- Understand the demographics and infrastructure in the jurisdiction, including determining the number of people with access and functional needs.
- Review results pertaining to housing from national, regional, or statewide studies.
- Create a scenario to drive the planning effort (e.g., the maximum number of people to shelter, number of homes destroyed).
- Research existing roles and responsibilities by distributing surveys or fact sheets to collaborative planning team members.
- Identify the lead agency(ies) for disaster housing solutions.
- Identify mutual aid partners.
- Consider issuing a community survey to better understand local demographics and housing needs.

Planning Assumptions and Considerations

- Based on the scenario, develop assumptions (e.g., will enough resources be available, percentage of displaced survivors that will request assistance) to frame the COAs.
- Review the planning considerations in this document, as well as any additional assumptions (e.g., available resources, usable locations, permitting and utility connection processes) and complete or refine them based on the jurisdiction’s needs.
• Regulations and Authorities: Key Considerations

☐ What entities have regulatory or legislative responsibilities for disaster housing within the jurisdiction?

☐ What is the legal basis for mutual aid agreements to provide housing assistance?

☐ What health and safety protocols can impact return to, and occupancy of, homes and buildings?

☐ What codes and ordinances may need to be waived or suspended to support temporary housing solutions (e.g., placement of temporary housing units, distance from roadways, multiple temporary housing units on property, zoning, local flood damage prevention ordinances)?

• Natural Environment: Key Considerations

☐ Has the jurisdiction conducted GIS modeling to determine topography and assess impacts from hazards?

☐ What unique environmental risks in the jurisdiction could result in large numbers of displaced persons or challenges with rebuilding (e.g., coastal areas, floodplains, seismic zones)?

☐ Are any cultural or historical sites in the jurisdiction governed by specific regulations?

☐ Would any zoning regulations hinder the ability to rebuild in certain locations due to environmental considerations?

☐ Does the jurisdiction have high-risk flooding areas or Special Flood Hazard Areas?

☐ Are threatened or endangered species or other protected wildlife or plants present in any proposed locations where land-clearing activities may be required?

• Infrastructure: Key Considerations

☐ What critical infrastructure (e.g., water/wastewater plants, health care systems, schools), if damaged, could impact ability of individuals to return to their homes?

☐ What are the specific building codes to which structures need to be rebuilt?

☐ Do planners have access to a list of key public and private infrastructure partners (e.g., power providers, utility companies) on which the jurisdiction relies?

• Population: Key Considerations

☐ What are the most densely populated areas in the jurisdiction?

☐ Does the population for the jurisdiction fluctuate throughout the year (e.g., periods of the year where the tourist population increases)?

☐ What is the demographic breakdown of the jurisdiction? How current are the statistics?

☐ Which agencies within the jurisdiction provide services to the population with access and functional needs?

☐ What is the homeless population in the jurisdiction? Are there plans for sheltering or housing them following a disaster?
What portion of the community receives pre-disaster housing assistance?

What are the estimated numbers of the community’s homeowners and renters?

How many hospitals or medical centers are in the jurisdiction? Do they have evacuation plans in place?

Does the planning team have copies of evacuation plans for jails/prisons and medical centers?

What is the composition of the current housing stock (e.g., rentals, single-family, multi-family, short term occupancy)?

What percentage of the housing inventory is accessible for people with access and functional needs?

Does the jurisdiction have temporary housing resources (e.g., temporary housing units, trailers)?

What is the percentage of homeowners and renters in the area?

What percentage of the housing inventory is non-primary residences?

Are agreements in place for temporary housing solutions (e.g., with neighboring jurisdiction, colleges, hotels)?

Can building codes or zoning ordinances be waivered to create additional temporary housing solutions? If so, what is the process for that?

Is there an inventory of potential areas that could support group sites?

Is there an inventory of available pads for lease?

What, if any, pre-positioned contracts exist in the jurisdiction for housing-related services?

If any exist, have they recently been reviewed for accuracy and currency?

If none exist, are there resource gaps where a contract should be considered?

What is the contract process that would be used to address housing needs?

Does the planning team understand the requirements for Federal acquisitions?

Are there any host state agreements already in place at the state or territory level?

If not, should host state agreements be established?

Does the agreement specifically address relocation of displaced individuals?

Does the agreement specify procedures or limits to sharing information on displaced individuals (e.g., personally identifiable information)?
• **Wrap-Around Services: Key Considerations**
  - Have the wrap-around services and the agencies or organizations responsible for providing them been identified within the jurisdiction?
  - Are wrap-around service providers part of relevant planning efforts?
  - What community organizations and partners can provide support and resources?

• **Housing Inspections: Key Considerations**
  - What entity is responsible for occupation and safety inspections?
  - What are the available housing inspection resources within the jurisdiction?
  - Does the state recognize certifications and licenses from other states?
  - Are mutual aid agreements in place for additional housing inspectors?
  - What ways can inspections be expedited (e.g., waivers)?
  - What is the current waiting time to receive a certification of occupancy? Can this be expedited post incident?

• **Public Information, Outreach, and Preparedness: Key Considerations**
  - What communication channels will communicate relevant information to the community?
  - Has disaster-housing-related messaging already been developed within the jurisdiction?
  - Who is responsible for releasing information to the public within a jurisdiction?
  - What community organizations can help amplify housing-related messaging?
  - Will a website be established to convey disaster-housing information? How would it be established and who will sustain it?
  - What is the protocol to synchronize messages between local, state, and Federal entities?

*Step 3: Determine Housing Goals and Objectives*
  - Review the goals from the National Disaster Housing Strategy.
  - Verify with senior officials (elected or appointed) any additional housing goals that are unique to the jurisdiction.
  - Conduct a working session with the collaborative planning team to map out a framework for each goal (goal; objective; actions).
  - Develop COAs for each objective.
  - Determine the measure(s) of success for each objective.
  - Discuss the jurisdiction’s capability to achieve the objectives – including discussing strengths and weaknesses of staffing, funding, and resources.
  - Identify housing capability gaps and solutions for closing them.
Step 4: Housing Plan Development

Purpose, Scope, Situation Overview, and Planning Assumptions

- **Purpose**
  - Indicate the reason a disaster housing plan is necessary in context of the jurisdiction or state.
  - State what the plan is intended to accomplish.

- **Scope**
  - Clearly indicate when housing phases are anticipated to transition from sheltering to interim housing to permanent housing.

- **Situation Overview**
  - Describe the unique characteristics of the jurisdiction or state (e.g., population, demographics, geography, socioeconomic factors, infrastructure) and what impact they have on its ability to provide disaster housing.
  - Explain the roles and responsibilities of key organizations (from research in Step 2).

- **Planning Assumptions**
  - Include the list of planning assumptions specific to sheltering, interim housing, or permanent housing.

Concept of Operations

- **Sheltering**
  - Identify and describe the agencies and their actions to identify, open, and staff emergency shelters, including the temporary use of reception centers while waiting for shelters to officially open.
  - Describe mutual aid agreements in place with other jurisdictions for receiving sheltering assistance, including providing shelters when it is not practical to do so locally.
  - Describe the conditions under which in-place and non-congregate sheltering (e.g., trailer, hotel) will be used (e.g., snow emergencies, chemical incidents, pandemics). Identify which agencies will support these operations and how they will determine when to implement these operations.
  - Describe how the jurisdiction will ensure the physical and programmatic accessibility of shelter facilities, effective communication using multiple methods, full access to emergency services, and reasonable modification of programs or policies where needed.
  - Describe how shelters will coordinate their operations with on-site and off-site support agencies.
  - Identify and describe the agencies and their actions to inform the public about sheltering-in-place (e.g., implementation, updates, and termination).
  - Describe the plans, methods, and agencies/organizations responsible for distributing emergency relief items (e.g., hygiene kits, cleanup items, infant care supplies).
Identify and describe the agencies/organizations and their methods to provide feeding services, both within the shelter facilities and at other identified feeding sites or mobile feeding operations.

Identify and describe the agencies and their actions to provide short-term lodging and other mass care needs (beds/cots, food/water, crisis counseling, phones, clergy support, household pets/service animals support).

Identify and describe the agencies and their methods to provide care and support for institutionalized populations, children, and individuals with access and functional needs, including their caregivers.

Identify and describe the actions to ensure that ADA Accessibility Guidelines govern shelter site selection and operation.

Describe the method to provide necessary developmentally appropriate supplies (e.g., diapers, formula, age-appropriate foods), staff, medicines, durable medical equipment, and supplies needed during an emergency for children and those with access and functional needs.

Describe the mechanisms or processes for handling and providing services for unaccompanied minors in shelters.

Describe the method to provide guidance on the admission and treatment of service animals.

Identify and describe the agencies and their actions to identify, screen, and handle evacuees exposed to hazards from a disaster (e.g., infectious waste, polluted floodwaters, chemical hazards) and to keep the shelter free of contamination.

Describe how shelters inform evacuees about incident status, including actions that shelter residents may need to take when they return home.

Identify and describe the agencies and their actions to notify and inform the public about the status of injured or missing relatives.

Identify and describe the agencies and their actions to care for household pets and service animals that are brought to shelters.

Describe the method for household pet registration (including identification of a current rabies vaccination for all animals).

Describe the method to reunite rescued animals with their owners.

Identify and describe the actions to address the long-term care, permanent relocation, or disposal of unclaimed pets.

**Interim Housing**

Identify and describe the agencies/organizations who have the lead for interim housing.

Identify the wrap-around services that need to be in place to enable interim housing solutions (varies by jurisdiction).

Identify utility connection processes and the responsible party for each step.
Identify potential waivers or payment plans for utility connections for applicants with past-due accounts.

Identify and coordinate with private sector utility companies to expedite inspections and connections.

List the inventory of potential interim housing solutions. Include those within the jurisdiction and within neighboring jurisdictions or states (within a reasonable commuting time).

Include a list of programs that can provide rental assistance.

Address a surge plan for building inspectors/permit officials. Explore mechanisms to increase staffing/capability for local code enforcements and inspections.

Determine the need for any post-disaster expedited approval processes for waiving ordinances to accommodate temporary housing.

Develop a contract template to use should emergency repairs be needed to public facilities necessary for housing.

Determine whether the state currently inventories rental properties. If yes, ensure that buildings can accommodate people with access and functional needs in accordance with the Architectural Barriers Act/ADA.

Identify the number of houses and housing units in the special flood hazard area.

Determine if the state has agreements with other states to host evacuees on an interim basis and provide health, social services, education and child-care access if need exceeds capacity.

Create an inventory of commercial recreational vehicle and manufactured housing pads and parks, including availability status.

Describe the plan to compile damage assessments.

Identified what types of temporary housing units can be used within the jurisdiction or state and communicate that to FEMA.

Determine if a communications plan in place to distribute information on housing assistance.

**Permanent Housing**

Identify permanent housing vacancy rates and fair market rates for a range of housing sizes across the jurisdiction.

Identify sites where interim housing can be converted to permanent housing.

Consider ordinances that:

- Allow temporary housing units such as manufactured housing units on private property.
- Allow or temporarily remove restrictions on auxiliary housing units in single-family neighborhoods.
Specify how environmental and historic resources will be protected when permanent housing is placed on private and/or public property.

Permit electrical connection in the absence of a building permit so that repair work can begin; the electrical connection permit might indicate that all work must be brought into compliance with existing codes.

Establish a limited building permit that will allow limited repairs to prevent further damage to a structure.

Plan to make accommodations for individuals with access and functional needs.

Direction, Control, and Coordination

Describe plan leadership and oversight.

If a Housing Task Force will execute the plan, describe the composition, roles and responsibilities, and triggers for activating and deactivating it.

Provide a clear unity of command when involving multiple organizations and multiple incident scenes.

Communications

Operational Communication

Identify a mechanism to ensure timely, accurate, and consistent disaster housing messaging across disciplines and jurisdictions.

Identify support organizations, capabilities, and teams to establish an effective and continuous interoperable communication, including cellular communications.

Public Information and Warning

Provide a coordinated joint approach to deliver timely, accurate, accessible, and consistent messaging in alternative formats on disaster housing.

Address messaging and distribution mechanisms to account for the demographics and resources of the jurisdiction.

Address the use of social media to distribute public information rapidly to prevent inaccurate or misleading information.

Administration, Finance, and Logistics

Identify administrative controls to provide resource and expenditure accountability.

Preparedness, Mitigation, and Recovery

Incorporate short-term, interim, and long-term recovery strategies/objectives.

Address how to implement support plans for survivors and families of the deceased.

Include strategies to implement the RSFs after the incident.

Include how to provide mental health assistance and support in recovery efforts.

Outline remediation procedures for damaged or hazardous sites.
Implementation, Maintenance, and Training

- Identify the agency responsible for updating and maintaining the plan.
- Identify applicable, available disaster housing training and exercises.
- Identify/summarize how and to whom the plan is distributed; indicate whether it is shared with the public.
- Include a schedule to review and revise the plan.
- Identify the process used to review and revise the plan.
- Include all partners involved in the annex development in the plan’s maintenance and training schedule.
- Outline the responsibility of partners to review and provide changes to the plan; identify the process to provide feedback.

Authorities and References

- Include a list of the relevant authorities.
- Include links to applicable references and guidance.

Step 5: Housing Plan Preparation, Review, and Approval

- Release the document for at least one formal comment period.
- Conduct adjudication session(s) with the housing collaborative planning team.
- Ensure concurrence of agencies/organizations on the collaborative planning team.
- Obtain approval of senior leaders of agencies with primary responsibilities for housing.

Step 6: Housing Plan Implementation and Maintenance

- Execute roll-out strategy communicating the release and availability of the plan to key stakeholders.
- Conduct training on housing plan.
- Identify opportunities to exercise the housing plan.
- Identify and address training gaps identified through real-world events, exercises, and routine plan reviews.
- Update the plan based on lessons learned.
- Conduct periodic review as identified within housing plan.
Appendix D: Other Resources

- **FEMA Disaster Housing Resource Center.** Provides resource information, such as links to housing strategic documents, interim housing resources, and permanent housing resources. https://www.fema.gov/housing-resources

- **HUD Disaster Resources Website.** https://www.hud.gov/info/disasterresources

- **SBA Disaster Assistance Website.** https://www.sba.gov/funding-programs/disaster-assistance