



Pre-Disaster Housing Planning Guide

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FEMA

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CHAPTER 1: ORGANIZATION

Purpose

This document provides guidance for State, Local, Tribal, and Territorial (SLTT) governments on developing and implementing pre-disaster housing plans and strategies. It is organized according to three key topic areas for SLTT governments to consider when planning for, coordinating, and executing a post-disaster housing recovery strategy. The actions outlined in this document will be most successful when done in collaboration with stakeholders across community development, emergency management, housing, and non-profit organizations.

Pre-disaster housing recovery strategies help ensure an efficient, deliberate, and coordinated approach to disaster housing resilience and recovery before, during, and after a disaster. To improve housing recovery outcomes, SLTT governments should prepare a pre-disaster housing recovery strategy that identifies priorities and outlines critical jurisdiction-specific processes and procedures.

Scope and Applicability

This guide provides a collection of best practices and suggestions for SLTT governments to use in the creation or updating of their pre-disaster housing plans and strategies. The guide provides a structure for SLTT governments to frame the development process of pre-disaster housing plans and strategies; as well as suggested resources to incorporate into a plan. This guide is designed to be useful to all SLTT stakeholders involved in the housing planning and recovery process. It is written for both emergency management and housing and development organizations. The suggestions made in it will be most successful when collaboratively worked on by these groups.

Supersession

This document is consistent with existing authorities, policy, and doctrine. It does not supersede existing doctrine or policy pertaining to pre-disaster housing planning.

Authorities and Foundational Documents

Many foundational documents provide statutory, regulatory, and executive guidance for FEMA when implementing a direct housing mission. Key foundational documents for the Pre-Disaster Housing Planning Guide include the following:

- Public Law 93-288, as amended, Section 408(c) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act; 42 U.S.C. § 5174(c) and § 5174(d).
- National Disaster Recovery Framework (NDRF), November 2011

The documents listed at the end of this document in [Appendix C](#), Table 1, have informed the creation of this guide. These specific documents have been included here as a list of additional resources for SLTT governments as they create their pre-disaster housing plans and strategies.

Document Management and Maintenance

The FEMA Office of Response and Recovery, Office of Doctrine and Policy is responsible for the management and maintenance of this document. Comments and feedback from FEMA personnel and stakeholders regarding this document should be directed to the Office of Policy and Doctrine at FEMA headquarters.

Document Organization

This guide is divided into three key topic areas, which form the basis for a comprehensive post-disaster housing recovery strategy. The key topics are:

1. Planning and Preparedness
2. Partner Identification, Organization, and Coordination
3. Disaster Housing Transition Strategy

Figure 1 below depicts how these topic areas are connected along a continuum from steady-state preparedness, through long-term recovery.

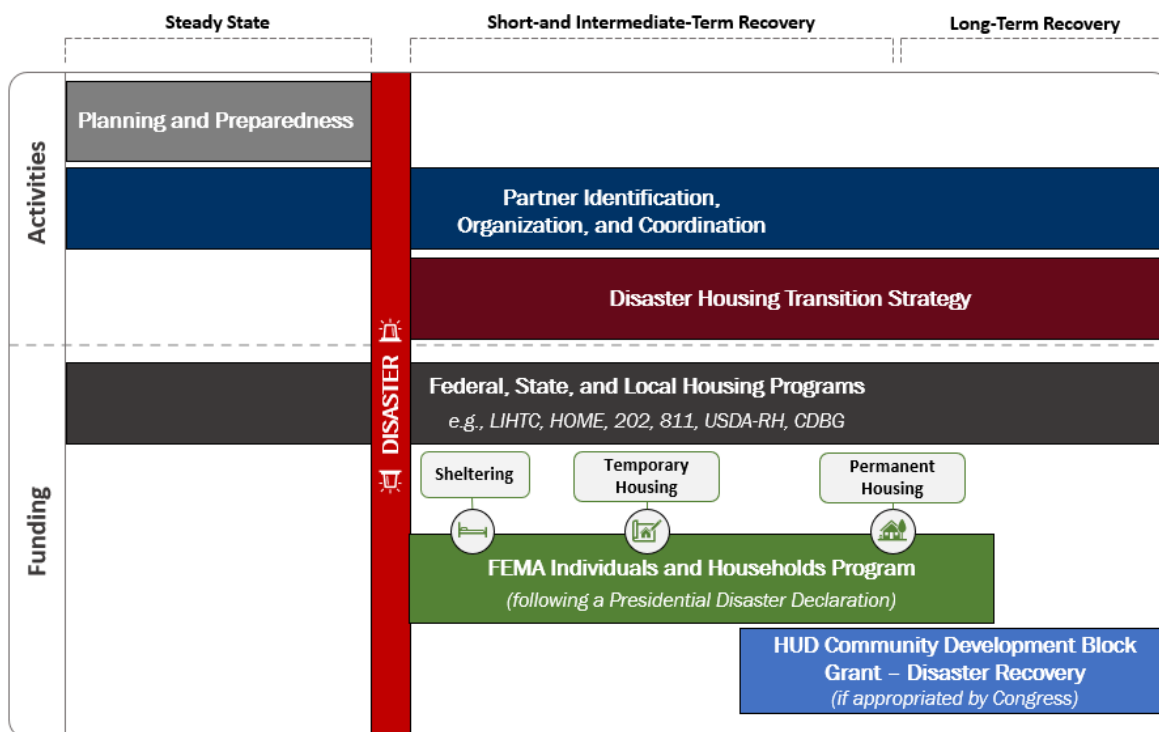


Figure 1: Timeline of Activity and Funding Considerations

Chapter 2: Planning and Preparedness

This chapter outlines recommended considerations for pre-disaster housing planning and preparedness activities, including identifying funding resources; conducting risk assessments; integrating federal, state, tribal, and/or territorial recovery programs; and conducting training and exercises to build and maintain housing capabilities.

Investing in Affordable, Accessible, and Resilient Housing During Steady State

Post-disaster housing recovery will occur in a landscape shaped by the ongoing affordable housing crisis. Affordable housing is generally defined as housing on which the occupant is paying no more than 30% of gross income for housing costs, including utilities. The lack of accessible housing in a community pre-disaster creates a significant point of disruption in the recovery process for people with disabilities before or as a result of the disaster. In addition to affordability and accessibility, it is important that housing is decent, safe, and located in proximity to adequate employment and transportation options. [According to HUD](#), at present, there is no county in the United States where a worker with a full-time, federal minimum-wage job could afford the median rent for a two-bedroom apartment.

Utilizing Affordable Housing Strategies

The first step to prepare for post-disaster recovery is to invest in affordable, accessible, and resilient housing before a disaster occurs. SLTT governments can do this through a variety of strategies and programs available during steady state, such as:

1. Effective use of public funds and exploring municipal resources.
 - a. Examples: Tax Increment Financing (TIF) Districts, Public Housing Capital Fund, Payment in Lieu of Taxes (PILOT) programs, bridge loans, property acquisitions, etc.
2. Effective use of external funds. Leverage available sources of funding and learn about additional funding models for affordable housing.
 - a. Examples: Low-Income Housing Tax Credits, Opportunity Zone funds, Community Land Trusts, Deed restricted homeownership, etc.
3. Land Use and Entitlement Properties. Governments can use land use policies to promote the development and preservation of affordable housing.
 - a. Examples: Accessory Dwelling Units (ADUs), density bonuses, reduced parking requirements, Brownfields, etc.
4. Development of Public Property. Governments can kickstart the production of affordable, accessible housing by using existing public assets.
 - a. Examples: Adaptive reuse of public buildings, co-locating housing with public uses, land banking, redevelopment of public land, etc.

5. Preservation of Existing Affordable Housing Stock. Governments can maintain existing affordable housing stock by proactively investing in existing deteriorating or inadequate infrastructure and targeting units with expiring affordability requirements for reinvestment.
 - a. Example: Develop an affordable, housing-centered, and transit-oriented development plan in coordination with local municipal planning organizations.
6. SLTT governments, housing and community development agencies, housing developers, and managers may need to get creative to increase the stock of affordable, accessible housing in their communities. They can use creative financial mechanisms and affordable housing models, such as:
 - a. Community Land Trusts (CLTS)
 - b. Land Swaps
 - c. Deed-Restricted Homeownership
 - d. Employer-Assisted Housing (EAH)
 - e. Limited Equity Cooperatives (LECS)
 - f. Tenant Opportunity to Purchase Act (TOPA)
 - g. Medicaid Waivers and other supportive services funding
 - h. Social Impact Bonds

Federal Funding and Programs for Investing in Affordable Housing

The federal government administers programs that SLTT governments can use to support or invest in affordable housing pre-disaster. All federally funded housing projects must comply with the [requirements for physical accessibility](#) prescribed by law and regulation. The Department of Housing and Urban Development (HUD) offers many programs and financing options that SLTT governments can use to develop affordable housing. These programs include:

1. **HOME Investment Partnerships (HOME):** Congress created the HOME Program to provide participating jurisdictions, both state and local, with flexible funding, specifically to meet the affordable housing needs of low-income renters and homebuyers/homeowners.
 - a. Eligible activities include costs associated with housing acquisition, new construction, and rehabilitation, as well as tenant-based rental assistance.
 - i. HOME Community Housing Development Organization (CHDO): CHDO is a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. At least 15% of HOME funds must be set aside for specific activities to be undertaken by HOME CHDO.
 - ii. HOME Homeowner Rehabilitation: HOME funds may be used to assist existing homeowners with the repair, rehabilitation, or reconstruction

- of owner-occupied units. This must be done according to the Participating Jurisdiction's (PJ) written rehabilitation standard.
- iii. **HOME Consortia:** Forming a consortium allows local governments who would not otherwise qualify for funding to join with other contiguous units of local government to directly participate in the HOME Investment Partnership Program.
2. **Housing Trust Fund (HTF):** The HTF Program provides grants to states to develop and preserve affordable housing— primarily rental housing for extremely low-income households.
- a. Eligible activities include housing acquisition, new construction, and rehabilitation, along with operating subsidies to ensure the long-term financial stability of assisted projects.
 - i. **National Housing Trust Fund** – Used to produce or preserve affordable housing through new construction, reconstruction, or rehabilitation of non-luxury housing; states are eligible grantees and must use 80% of funds for rental housing.
3. **Pathways to Removing Obstacles to Housing (PRO Housing):** Supports communities who are actively taking steps to remove barriers to affordable housing. Grantees may use awards to further develop, evaluate, and implement housing policy plans, improve housing strategies, and facilitate affordable housing production and preservation.
- a. Eligible applicants are local and state governments, metropolitan planning organizations (MPOs), and multijurisdictional entities.
4. **Community Development Block Grant (CDBG):** The CDBG Program provides formula block grant funding to states, cities, and counties for them to develop viable urban communities by providing a suitable living environment and by expanding economic opportunities for low- and moderate-income persons.
- a. Eligible housing-related activities include:
 - i. Acquisition of real property
 - ii. Clearance and demolition
 - iii. Infrastructure
 - iv. Rehabilitation
 - v. In limited circumstances, new housing construction
 - b. States and local governments become grantees who are awarded funding. Recipients of grant money include:
 - i. State and local agencies
 - ii. Nonprofit organizations
 - iii. Economic development agencies
 - iv. Citizens
 - v. Businesses

- c. HUD administers multiple CDBG programs which provide targeted support to states, local governments, tribal nations and territories. Applicants should review the [CDBG program website](#) to determine which program they fall under.
 - d. Regular CDBG funding is different from Community Development Block Grant-Disaster Recovery (CDBG-DR) funding. Regular CDBG funds are not intended for post-disaster recovery. However, if a CDBG recipient community experiences a disaster, they can request a waiver from HUD to repurpose their CDBG funds.
5. **Section 108 Loan Guarantee (Section 108):** The Section 108 Program enables CDBG grantees to leverage their annual CDBG grant allocation to access low-cost, adaptable financing for community and economic development-related projects.
- a. Eligible housing-related activities include housing rehabilitation, acquisition, site preparation, and, under limited circumstances, new affordable housing construction.
6. **Homeless Emergency Solutions Grant (ESG):** HUD's ESG is intended to assist people in quickly regaining stability in permanent housing after experiencing a housing crisis and/or homelessness. The program provides funds to:
- a. Engage homeless individuals and families living on the street;
 - b. Improve the number and quality of emergency shelters for homeless individuals and families;
 - c. Help operate these shelters;
 - d. Provide essential services to shelter residents;
 - e. Rapidly re-house homeless individuals and families; and
 - f. Prevent families and individuals from becoming homeless.

CDBG Funding for Disaster Recovery

The CDBG-DR program is funding that Congress makes available for disaster recovery on a supplemental basis. This funding is not always made available, and there is no guarantee if and when Congress will appropriate this funding following a disaster.

1. **CDBG Disaster Recovery (CDBG-DR):** CDBG-DR provides additional funding in response to extraordinary impacts from disasters. **Not all Presidentially declared disasters will receive CDBG-DR funds;** Congress may appropriate funds to HUD when there are significant unmet needs for long-term recovery, and HUD allocates funds based on unmet recovery needs. These funds may be used for disaster relief, long-term recovery, restoration of infrastructure, housing, and economic revitalization.
 - a. CDBG-DR appropriations were developed to provide significant additional funding to communities for long-term disaster recovery needs unmet by other federal sources, such as the Federal Emergency Management Agency (FEMA) and the Small Business Administration (SBA).

Additional Federal and Third-Party Sources of Funding

In addition to the CDBG-DR program, SLTT governments can turn to other federal agencies and programs to provide funding to assist in developing affordable housing:

1. **Federal Home Loan Banks' (FHLB) Affordable Housing Program (AHP):** FHLB's AHP is a competitive funding program for the production and preservation of affordable housing (both rental and homeownership) funded by the government sponsored FHLB system.
2. **Historic Tax Credits (HTCs):** Administered by the National Park Service and the Internal Revenue Service, HTCs provide capital funds for developers undertaking a substantial rehabilitation of a historic asset. HTCs can be used in the rehabilitation of historic residential buildings or the adaptive reuse of other historic structures.
3. **Housing Finance Agency (HFA) Risk-Sharing - Section 542:** Administered by approved HFAs, the program provides low-cost capital to spur the development of rental housing through risk-sharing arrangements between HUD and HFAs. This assists these agencies by providing more insurance and credit for multifamily loans.
4. **Investment Tax Credits (ITCS) and Other Energy Efficiency Funding:** ITCs are commonly referred to as "solar tax credits" because they may be used to cover a portion of the costs of installing solar arrays. ITCs and other funding mechanisms, such as utility rebates, energy performance contracts, and Property Assessed Clean Energy (PACE) programs, can be used as part of the funding stack for housing projects that commit to certain levels of energy generation.
5. **Low-Income Housing Tax Credits (LIHTCs):** These are allocated by state HFAs to private developers for the production or preservation of low-income housing. They can take the form of competitive 9% LIHTC awards or non-competitive 4% awards, which can be paired with local or State tax-exempt bond proceeds.
6. **New Markets Tax Credits (NMTCs):** Local organizations called Community Development Entities apply for NMTCs from the Community Development Financial Institutions Fund and invest the proceeds into public interest projects (including affordable housing construction) in qualified low-income communities.
7. **Opportunity Zones (OZS):** Created in 2017, OZS offers a tax incentive for people and corporations to invest in distressed communities across the country. The program is managed by the Internal Revenue Service (IRS).

8. **Tax-Exempt Bonds:** These are typically issued by state or local government agencies and, as mentioned above, are often in conjunction with an award of non-competitive 4% LIHTCs. Tax-exempt housing bonds function like loans that are contracted by governments and then passed along to developers but with one important difference: With tax-exempt housing bonds, the investor who purchases the loan is exempt from income taxes on the interest earned from that loan. These favorable terms are then passed on from the borrower (the government agency that issued the bonds) to the developer, resulting in a low-cost loan for the housing project.

Funding Mechanisms for Disaster Housing Preparedness, Mitigation, and Recovery

Post-disaster housing recovery strategies should provide an overview of how post-disaster housing is funded. Strategies should include funding plans for both declared federal disasters for which federal funds may be available and non-federally declared disasters that rely on non-disaster federal funds or SLTT resources, local and private funds. Understanding funding resources, mechanisms, and requirements prior to a disaster helps facilitate faster and more effective access to available resources. By defining SLTT funding priorities, identifying funding sources, and planning for how and when to apply for funding, SLTT governments can maximize federal, private sector, local, and non-governmental resources and identify barriers to recovery before a disaster occurs.

SLTT governments should identify primary funding sources for all phases of post-disaster housing recovery planning and operations; using statewide, tribal, territorial, and local disaster accounts, regular state, tribal, territorial, and local agency budgets, or anticipated federal funds to budget for the following:

1. **Pre-disaster preparedness and mitigation:** Actions taken to ensure communities are prepared to respond to and recover from a disaster, as well as those actions that seek to either prevent the disaster or lessen its impact. Identify steady state housing funding and regulatory processes, such as land use and zoning regulations in the state and localities, funding programs for construction, etc.
2. **Emergency Sheltering:** Immediate sheltering of disaster survivors. This type of assistance can take the form of large emergency shelters (e.g., local gymnasiums, facilities able to accommodate a large number of people), non-congregate shelters on individual or group sites, financial assistance (e.g., cash, vouchers, or direct payments) to assist survivors with short-term accommodations, shelters for those with access and functional needs, or medical needs (including service animals or pets), and other similar services.
 - a. **FEMA Public Assistance (PA):** FEMA PA can potentially be used to assist with emergency shelter costs. FEMA is authorized to provide PA funding for

emergency congregate and non-congregant sheltering under Emergency Work Category B. It is also authorized to provide PA funding for repairs to Public Housing Authority (PHA) facilities, including Public and Indian Housing (PIH), under Permanent Work Category E if HUD does not have funds for capital repair. Emergency Work (Category B) must be completed within six months, whereas permanent work (Category E) must be completed in 18 months.

3. **Disaster housing solutions** including, but not limited to:

- a. **Temporary housing:** Supporting survivors to meet their temporary housing needs with financial assistance to secure temporary housing or directly providing housing.
 - i. **FEMA's Individuals and Households Program (IHP)** can potentially be used to help eligible individuals and households with temporary housing. IHP provides financial and direct assistance to eligible individuals and households affected by a disaster who have uninsured or underinsured necessary expenses and serious needs. IHP can include assistance for housing needs, including:
 - 1. Displacement Assistance for survivors whose primary residence is uninhabitable or inaccessible. Survivors will receive cash assistance that provides them with greater flexibility in making the best decision for their immediate housing needs.
 - 2. Funds for temporary housing while survivors are unable to live in your home, such as rental assistance or reimbursement for hotel costs.
 - 3. A temporary housing unit, if approved for the disaster, when survivors are not able to use rental assistance due to a lack of available housing resources.
 - 4. Funds to support the repair or replacement of owner-occupied homes that serve as the household's primary residence, including privately owned access routes, such as driveways, roads, or bridges.
 - ii. **FEMA Public Assistance:** In certain circumstances, FEMA PA can assist with temporary housing costs. Refer to FEMA Public Assistance Program and Policy Guide (PAPPG).
 - iii. **HUD's RUSH (Rapid Unsheltered Survivor Housing):** RUSH funding, provided through HUD, is available to help communities provide outreach, emergency shelter, rapid re-housing, and other assistance to people experiencing or at risk of homelessness who are in a disaster-affected area but who cannot access all services provided by FEMA programs.
- b. **Repair:** States and localities can develop a Rapid Repair Program in partnership with Voluntary Organizations Active in Disasters (VOAD) and using state funding or donations.

- i. **FEMA Repair:** Also available under IHP, FEMA may provide direct repairs or financial repairs assistance to eligible applicants.
4. **Long-term recovery:** Actions taken to achieve longer-term housing development and creation goals and plans; integrate ongoing work into steady-state housing strategies; and continue the process of rebuilding the physical, social, environmental, and economic components of impacted communities. Long-term recovery programs overlap with the programs described in the affordable housing investment section (Ex. CDBG, Section 108, CDBG-DR, and PRO Housing).

Post-disaster housing recovery strategies should identify contingency plans for obtaining additional funding and support in the event that standard resources are unavailable due to competing resource requirements or budget constraints. Examples of funding contingency plans include:

1. Using rainy day funds, disaster response funds, or emergency accounts.
2. Leveraging supplemental appropriations mechanisms.
3. Invoking transfer authorities to move funds from one agency to another during an emergency.
 - a. These authorities can be written and approved before a disaster so that they are ready to be enacted.
4. Realigning steady-state housing funds that were previously allocated for other purposes to address post-disaster housing needs.
 - a. Consider what funds will be reimbursable at a later date if federal funds are allocated. Create a sequence of funds to draw from to bridge program gaps. Begin with funds that can be reimbursed by federal programs down the line and draw on non-reimbursable funds as a last resort.
5. Calling on Emergency Management Assistance Compact (EMAC) interstate mutual aid agreements.
 - a. Through EMAC, disaster impacted states can request assistance from assisting member states. The states in the compact provide a “seamless” flow of needed goods and services to the impacted state to be reimbursed at a later point. The system allows for timely and cost-effective relief by mitigating resource deficiencies and ensuring maximum use of all available resources within member states’ inventories.

SLTT governments should identify potential projects and initiatives to enhance long-term community resilience via federal, state, tribal, territorial, and local funding opportunities. These projects should be identified during the development or updating of the post-disaster housing recovery strategies. Examples of long-term community resilience include:

1. Establish a SLTT Disaster Housing Task Force (DHTF) made up of stakeholders from the organizations that are responsible for housing, emergency management, and

intergovernmental coordination. DHTF stakeholders should bring the actions outlined in this list back to their respective offices.

2. Building code update and enforcement to mitigate losses from natural hazards by adopting the Building Code Effectiveness Grading Scheduling (BCEGS).
3. Climate resilient development via HUD's CDBG programs.
4. Hazard mitigation projects via FEMA's Building Resilience Infrastructure and Communities (BRIC).
5. Create and maintain a Hazard Mitigation Plan using FEMA's State and Local Mitigation Planning Policy Guides and the Tribal Mitigation Plan Review Guide.
6. Retrofit programs via HUD's Green and Resilient Retrofit Program for HUD-assisted multifamily properties and annual CDBG funds for single-family retrofits.
7. Use HUD's Housing Trust Fund (HTF) Program to develop and preserve affordable housing, as well as housing acquisition, new construction, and rehabilitation.
8. Utilizing HOME Investment Partnership Program (HOME) formula grants for states and localities to aid in building and/or maintaining affordable housing.
9. Section 108 provides communities with low-cost, long-term financing options for community development projects, such as housing, public facilities, and improvements to resiliency.
10. CDBG Program annual grants to develop viable urban communities through providing decent housing, suitable living environments, and expanding economic opportunities principally for low- and moderate-income persons.

Risk Assessment

Post-disaster housing strategies should be informed by a risk assessment. A risk assessment should include a list of locations throughout the SLTT's jurisdiction that are at increased risk for disaster impacts and are most likely to require post-disaster housing support. Each location identified in the risk assessment should include a risk mitigation strategy. SLTTs should conduct a risk assessment to identify communities that are most likely to require post-disaster housing support.

Potential risk assessment considerations include:

1. General threat and hazard identification (e.g., leveraging Threat and Hazard Identification and Risk Assessment [THIRA], Stakeholder Preparedness Review [SPR], Hazard Mitigation Plans, and Resilience Analysis and Planning Tool [RAPT] data).
2. Assessment of both the reliability and resilience of critical infrastructure systems with which housing needs are interdependent.
3. Community-specific environmental, cultural, and regulatory considerations that would impact the delivery of post-disaster housing solutions.

4. Assessing the needs of facilities housing institutionalized persons or the homeless, including but not limited to jails, prisons, shelters, senior facilities, and inpatient healthcare facilities.
5. Mapping Repetitive Loss Areas for Community Rating Systems (CRS) to help identify where housing needs will likely occur. The Community Rating System (CRS) is a voluntary incentive program that recognizes and encourages community floodplain management practices that exceed the minimum requirements of the National Flood Insurance Program (NFIP).
6. Accounting for post-disaster housing limitations, such as:
 - a. Communities with a high percentage of renters as these individuals will be at a higher risk of eviction post-disaster,
 - b. Communities with a high rate of uninsured and underinsured properties.
 - c. Labor and construction supply shortages, supply-chain constraints, policies, regulations, and permitting requirements for new construction and repairs,
 - d. Communities that lack existing rental properties (e.g., by identifying communities with low rental vacancy rates).
 - e. Densely populated urban centers or flood zones unsuited to travel trailer/manufactured housing unit installation.
7. Population profiles, which can be developed by reviewing a variety of data, such as:
 - a. FEMA's [National Risk Index](#)
 - b. HUD's [point-in-time data](#)
 - c. HUD's [Worst Case Housing Needs Report \(2021\)](#)
 - d. HUD and U.S. Census Bureau's [American Housing Survey](#)

Integration of Federal and State, Tribal, Territorial, and Local Recovery Programs

Post-disaster housing recovery strategies should describe how SLTTs plan to integrate FEMA, HUD, and other federal programs with their own recovery programs and other resources to provide post-disaster housing support. The goal of the post-disaster housing recovery strategy is to provide an overview of how survivors should be directed to the appropriate program for their needs in such a way that the survivor is supported throughout the whole life cycle of the incident.

Post-disaster housing recovery strategies should include information on SLTT disaster housing programs (as well as local housing assistance programs). This could include information such as:

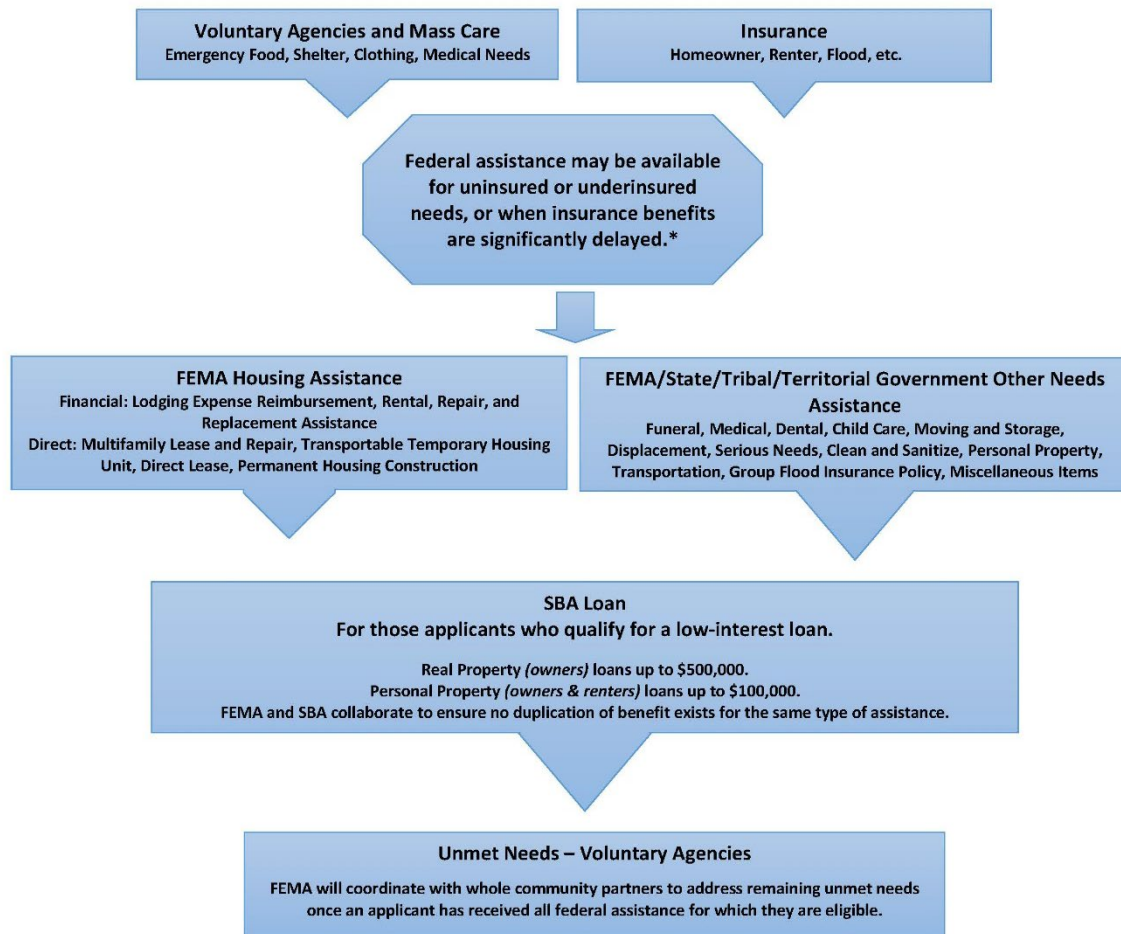
1. Programmatic processes and management systems

2. Eligibility and documentation requirements
3. Key programmatic points of contact and relevant stakeholders
4. Timeframes for delivering assistance throughout all phases of recovery

Recovery strategies should be developed with ongoing communication and outreach across partners to ensure that strategies are holistic, and capture identified needs for every level of survivor and leader. The strategies should ensure that individuals and communities affected by disasters do not face unlawful discrimination in violation of [Title VI of the Civil Rights Act of 1964](#). The Department of Justice provides guidance for recipients of federal emergency preparedness, response, mitigation, and recovery assistance to help ensure compliance with the Civil Rights Act.

Sequence of Delivery

Post-disaster housing recovery strategies should identify key federal resource availability timelines to guide optimal sequencing and integration of recovery programs. The sequence of delivery establishes the order in which disaster relief agencies and organizations provide assistance to disaster survivors. This is intended to maximize available resources, and coordinate efforts to help disaster survivors navigate the recovery process.



*Eligibility for Federal assistance is based on each applicant's individual circumstances as they relate to each program's conditions of eligibility. Not all applicants will be eligible for all forms of Federal assistance.

Figure 2: Disaster Assistance Sequence of Delivery

Duplication of Benefits

Post-disaster housing recovery strategies should identify and implement key considerations for avoiding duplication of benefits when integrating federal, SLTT, and non-governmental programs into the post-disaster housing recovery strategy. A duplication of benefits occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. In general, because of the typical sequencing of recovery funding, duplication of benefits issues is most likely to occur for CDBG-DR.

Sources of duplication of benefits requirements include the following:

1. Section 312 (42 U.S.C. 5155) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act,

2. CDBG-DR Appropriations Acts,
3. HUD Federal Register Notices, and
4. Office of Management and Budget Cost Principles (24 CFR part 570 and 2 CFR 200, subpart E).

To avoid duplication of benefits, SLTT governments should:

1. Conduct individual duplication of benefits analyses.
2. Provide technical assistance to subrecipients and contractors that may be involved in the duplication of benefits analysis.
3. Stagger application periods.
4. Implement unified rules across participating organizations for handling Personal Identifiable Information (PII) and Sensitive personal identifiable Information (SPII). Aligning PII and SPII policies will not always be possible.
5. Implement data collection strategies and data sharing agreements with participating agencies, with strong protections for PII and SPII.
6. Verify all sources of assistance received by recipients or applicants, as applicable, prior to awarding funds.
7. Determine a recipient or an applicant's remaining funding need(s) before committing funds or awarding assistance.
8. Require beneficiaries to enter into a signed agreement to repay any duplicative assistance if they later receive additional assistance for the same purpose for which the award was provided.
9. Deploy Disaster Case Managers to work with survivors to determine their unmet needs and eligibility for disaster recovery assistance programs.
10. Apply the Necessary and Reasonable cost principles and Audit Requirements for Federal Awards in subpart E of 2 CFR 200.
11. Reflect treatment of loans that is consistent with the requirements of the Declined Loans Provision and the Disaster Recovery Reform Act of 2018.

Training, Exercises, and Continuous Improvement

Post-disaster housing recovery strategies should identify training and exercise opportunities to build and maintain the capabilities required to provide post-disaster housing support. SLTTs should identify a continuous improvement strategy for incorporating lessons learned and best practices from experiences with disaster housing operations. Additionally, SLTTs should use the post-disaster housing recovery strategy to detail plans to conduct training and exercises to build and maintain the capability to coordinate and support post-disaster housing recovery.

During recovery planning, SLTTs should be empowered to design and implement housing strategies that are tailored to their specific needs. The post-disaster housing recovery strategy should be used to detail plans to develop and/or conduct disaster housing

exercises. Planners should consider applying exercises best practices, including the following:

1. Incorporate key partners and stakeholders (both internal and external) into exercises; exercises strongly benefit from a range of perspectives.
2. During exercise design, incorporate SLTT-specific information and data on threats and hazards; risks; housing and emergency management capabilities; and improvements implemented from previously identified shortfalls or gaps.
3. Use exercises as an opportunity to support and validate existing plans and strategies. Exercises provide a forum to assess individual plans or the integration of multiple community plans to align and deconflict plans, strategies, actions, and assumptions.
4. Seek opportunities to establish mutual aid agreements or other partnerships to deploy housing staff and experts when other SLTTs need assistance to gain experience and maintain skills (particularly for SLTTs with infrequent disaster housing requirements).

Develop a continuous improvement strategy to identify and implement lessons learned and best practices, including those identified in after-action reports. This should include identifying specific offices or organizations responsible for maintaining after-actions and improvement plans, as well as creating a regular cadence for housing planning reviews and exercises.

Identify FEMA, HUD, and other federal training, exercise, and continuous improvement programs/partners who may be able to support and engage SLTTs in validating capabilities to coordinate and support post-disaster housing recovery and conduct after-action reporting. Information on training programs:

1. [Homeland Security Exercise and Evaluation Program](#)
2. [FEMA's National Exercise Program](#)
3. [HUD Training Opportunities](#)

CHAPTER 3: PARTNER IDENTIFICATION, ORGANIZATION, AND COORDINATION

This chapter outlines recommended considerations for the partner identification, organization, and coordination necessary to conduct disaster housing planning and support post-disaster housing recovery.

Organizational Approach

A post-disaster housing recovery strategy should describe the organizational structure, including roles and responsibilities, for the DHTF. The post-disaster housing recovery strategy should include the following components:

1. Identify the lead agency and supporting agencies helping to administer the disaster housing programs and coordinate housing recovery efforts. The lead agency does not have to be an emergency management organization but should have the requisite legal authorities to manage and implement housing programs.
 - a. Identify the organizational agency, department, or office that will be responsible for coordinating housing recovery efforts.
 - b. Identify all relevant agencies, departments, or offices that are expected to support the lead agency in supporting housing recovery efforts.
 - i. This includes any organizations with which SLTTs have pre-existing contracts or memorandums of agreement.
2. SLTTs should identify appropriate stakeholders across all SLTT departments and organizations that should be included in the DHTF. Appropriate stakeholders for inclusion include:
 - a. Planners,
 - b. Housing and community development agencies,
 - c. Emergency managers,
 - d. Key SLTT departmental staff,
 - e. Local VOADs,
 - f. Local Long Term Recovery Groups (LTRG)
 - g. Disability and minority advocacy groups/organizations,
 - h. Town/city managers, and
 - i. Community leaders.
3. The strategy should lay out the administrative process for the DHTF, lead agency, and supporting agencies required for disaster response and recovery, including:
 - a. Budgeting,
 - b. Resource management,

- c. Training, and
 - d. Data sharing agreements.
4. The strategy should outline the organizational structure and roles and responsibilities (including pre-disaster preparedness and post-disaster responsibilities) for the DHTF, lead agency, and supporting agencies required for disaster response.
 5. The strategy should also outline the approach for different types and sizes of incidents that may require activation of the DHTF, including planning assumptions for disaster response and anticipated resource requirements.
 6. Describe the approach to managing transitions from emergency sheltering to temporary housing and from temporary to long-term to ensure people do not fall through the cracks (including transitions to/from different agencies).
 7. The strategy should identify communications and outreach mechanisms that all stakeholders will use. Communication and outreach are keys to a successful housing operation as they ensure that everything goes as smoothly as possible and keep survivors and leaders at every level informed. Where possible, the plan should establish interagency data-sharing compacts.
 8. The strategy should describe the methodology used to ensure quality control over the financial and programmatic execution.

The members of a DHTF can use the following questions to help them as they develop or revise their post-disaster housing recovery strategy:

1. Do the SLTT's major cities have funding programs for home repair, housing construction, etc.?
2. Is the SLTT Home or Dillon Rule?
3. How does zoning and land use regulation work in the SLTT?
4. Is there inclusionary zoning or other non-financial incentives for housing?
5. Does the SLTT have a Housing Recovery Support Function (RSF) plan?
6. Is this plan current and accurate?
7. What are the roles and responsibilities for housing recovery across the SLTT agencies?
8. In an ideal world, when do the SLTT housing and sheltering programs turn on and off?

SLTT Led Disaster Housing Taskforce

A post-disaster housing recovery strategy may describe an activation plan for a SLTT-led DHTF to bring together SLTT, non-governmental organizations (NGO), the private sector, and federal expertise to evaluate housing requirements, consider potential solutions, and propose recommendations to support housing recovery for anyone impacted by the disaster. The DHTF should leverage partners' knowledge of local geography, demographics, and

context to anticipate needs during post-disaster housing operations. SLTTs should complete the following steps to create a plan for the DHTF to be quickly stood up following a disaster.

1. Define the roles and responsibilities of SLTT government officials with a role in disaster housing, along with key federal, non-governmental, and private sector partners with disaster housing equities or capabilities.
2. Assign DHTF members with housing support responsibilities. When identifying staff, consider the following categories of personnel:
 - a. **Communication and outreach** to develop and maintain a housing operations website, support elected officials and constituent outreach, support duplication of benefit messaging to communities, and foster public-private partnership development. Communications should account for groups with limited English proficiency, disabilities and other access and functional needs.
 - b. **Contracting** to execute and oversee pre-positioned and new support contracts and agreements.
 - c. **Grants management** to support grant application development, monitoring and oversight, financial management, financial and programmatic reporting, timely liquidation of all obligations, and closeout reporting.
 - d. **Housing program specialists** with SLTT housing or social services expertise; federal post-disaster housing recovery program expertise (FEMA, HUD, SBA, and U.S. Department of Agriculture programs); project management and policy development experience; and state, local, tribal, and territorial building code and regulatory expertise (e.g., consulting or contractor support).
 - e. **Information technology** to issue and maintain equipment, maintain systems of record, facilitate data transfer with partner information systems as necessary, and ensure compliance with PII security requirements.
 - f. **Logistics** support inventory control, facility management, resource transportation, equipment procurement, and record retention and management.
3. Identify the SLTTs' permanent DHTF members and provide an activation plan for those members.
4. Have quarterly or biannual check ins with housing stakeholders to coordinate on duplication of efforts. Make sure that relevant data is being shared across all organizations.
5. Consider the impacts of burnout on the DHTF members, particularly in the event of ongoing or multiple recovery processes. Burnout will likely impact members of the DHTF throughout the recovery process. The DHTF members and their home organizations should be mindful of overworking staff. Recovery can be a multi-year process, and to support and retain staff throughout the process, organizations should build accommodations to address burnout in their plans whenever possible.

Private Sector Integration

Post-disaster housing recovery strategies should outline an approach to integrating private sector support for the SLTT's housing recovery efforts. SLTT governments typically have close collaborative relationships with private sector partners within their jurisdiction. These relationships also offer the foundation for planning and exercises that enable preparedness and are supported, as appropriate, by federal partners. SLTTs should identify a plan for integrating private sector support, including:

- **Utility providers** to restore or install power and water services for emergency shelters and temporary housing units/facilities.
- **Local, regional, and national builders and construction firms** to provide post-disaster housing repair, construction, and wraparound services.
- **Housing providers, apartment management organizations, non-subsidized building associations, low-income housing providers, large regional property owners, hotel operators** and Continuum of Care organizations to help identify potential properties for temporary and permanent housing solutions.
- **CDFIs** to provide lending and identify sources of private capital in support of permanent housing solutions.
- **Private sector liaisons or chambers of commerce** at the SLTT and local level to help coordinate business-led, government-supported recovery operations.

Intergovernmental Support and Mutual Aid Agreements

Post-disaster housing recovery strategies should outline an approach to accessing resources and support from within and across the recipient's jurisdictional boundaries, including intergovernmental mutual aid agreements and memoranda of understanding (MOU) with the private sector or NGOs. SLTTs should identify anticipated intergovernmental support, such as existing agreements with neighboring SLTTs to host evacuees on an interim basis (e.g., via host state agreements), mutual aid agreements to acquire housing inspection resources (e.g., via EMAC agreements), and NGOs to provide sheltering or housing repair and construction services (e.g., Habitat for Humanity).

SLTTs should engage neighboring state partners to develop or expand reciprocity agreements to facilitate quick entry of out-of-state contractors to support post-disaster housing repair and new construction. Public housing authorities throughout the SLTT and nearby regions should be engaged to plan for rental subsidy "porting" to transfer benefits from one jurisdiction to another to help relieve pressure on a limited supply of post-disaster rental housing units.

CHAPTER 4: DISASTER HOUSING TRANSITION STRATEGY

A disaster housing transition strategy should include a detailed strategic plan for transitioning survivors between each phase of recovery, including activities, milestones, and transitions for each. Suggestions for each phase are detailed in this chapter.

Emergency Sheltering Phase Strategy

This phase is focused on the immediate sheltering of disaster survivors. This type of assistance can take the form of large emergency shelters (e.g., a local gymnasium, facilities able to accommodate a large number of people) and emergency group sites. All shelters should ensure requirements and accommodations for populations with disabilities and access and functional needs are being met. Additionally, shelter plans should account for population-specific needs such as pre-disaster homeless populations, medical needs (including service animals), etc.

The post-disaster recovery strategy for the emergency sheltering phase can include the following:

1. Identifies the agency and/or individual who will serve as the lead for the planning and execution of sheltering activities.
2. Current baseline resources, capabilities, and capacity, including the following:
 - a. Inventory of available congregant and non-congregant sheltering options or plans to collect such information,
 - b. Types, sizes, and locations of available sheltering, and
 - c. Ensure requirements and accommodations for populations with disabilities and other access and functional needs.
 - d. Ability to support medical and personal service care to individuals in the shelter who may need community and government support.
 - e. Plans for mental health support offered in the shelters.
 - f. Pet-friendly shelter plans.
3. How survivors will be transitioned to temporary housing solutions if necessary.
4. Key partners and their roles.
5. All agreements planned or in place with other SLTTs, jurisdictions, and partners, including information collection and data sharing agreements with emergency sheltering and other post-disaster housing service providers.
6. Potential resource and capacity shortfalls and how they will be addressed.

- a. FEMA PA can, in certain circumstances, fund eligible congregant and non-congregant sheltering activities, such as medical needs shelters. However, FEMA PA cannot be used to fund rental assistance.
- 7. All other risks or threats and how they will be addressed (e.g., Chemical, Biological, Radiological, Nuclear, and Explosives [CBRNE] threats and public health considerations).
- 8. Communication and outreach plans to survivors and all levels of leadership.

Temporary Housing Phase Strategy

This phase is focused on supporting survivors in meeting their temporary housing needs after emergency sheltering operations have ended or are being phased out. Assistance often takes the form of mobile housing units or manufactured homes.

The post-disaster housing recovery strategy for the temporary housing phase can include the following:

- 1. Identify the agency and/or individual who will serve as the lead for the planning and execution of temporary housing activities.
- 2. Current baseline resources, capabilities, and capacity, including the following:
 - a. Inventory of available housing, accessible housing units, rental housing, shelters, commercial manufactured and other temporary housing and recreational vehicle pads, and prospective group site locations for manufactured temporary housing or plans to collect such information,
 - b. Databases maintained by the SLTT and/or private sector,
 - c. Major providers of housing stock (e.g., property managers, housing authorities),
 - d. Areas of land suitable for use or development for staging or group sites,
 - e. Acceptable forms of manufactured temporary housing,
 - f. Requirements and accommodations for survivors with disabilities and access and functional needs,
 - g. SLTT's ability to provide caseworkers for impacted survivors to ensure effective transition to permanent housing solutions and
 - h. Known transportation limitations. This includes public transit routes and capacities, as well as access to jobs, childcare, education, and groceries.
- 3. If applicable, processes and procedures to:
 - a. Expedite the transportation of mobile homes,
 - b. Expedite the delivery of utility services to mobile homes, and
 - c. Expedite or waive permits required for the installation of mobile homes.
- 4. Known areas of the SLTT's jurisdiction where temporary housing would not be appropriate because of environmental, historic, floodplain, cultural, or other issues.

- a. Known transportation limitations. This includes public transit routes and capacities, as well as access to jobs, childcare, outpatient medical care, and education.
- 5. Key partners and their roles.
- 6. All agreements planned or in place with other SLTTs, jurisdictions, and partners.
- 7. Ways to refocus existing programs and policies in the event of consecutive disasters.
- 8. Potential resource and capacity shortfalls and how they will be addressed.
- 9. Plans for transitioning disaster survivors from emergency shelters to temporary or permanent housing construction, including information-sharing mechanisms to identify survivors' unmet needs and facilitate referrals to other service providers.
 - a. **FEMA direct temporary housing assistance** can be used to provide temporary housing when requested by the STT and approved by FEMA. This includes:
 - i. Transportable temporary housing units (TTHU), such as:
 - 1. RVs: For temporary placements of six months or less. Towable units that get placed at secondary locations.
 - 2. MHU: Used for households that require temporary housing for longer than six months.
 - ii. Multifamily Lease and Repair (MLR): Allows FEMA to enter into lease agreements with owners of multifamily rental property located within or near declared areas to make repairs or improvements that provide temporary housing to applicants.
 - iii. Direct Lease: Existing ready-for-occupancy residential property leased for eligible applicants and, if necessary, modified or improved to provide a reasonable accommodation for use as temporary housing.
- 10. HUD HQ and field staff work in conjunction with FEMA and the American Red Cross to support HUD-assisted renter's specific needs and direct them to appropriate resources. These groups can offer additional support throughout the recovery process.
 - a. **FEMA assistance:** HUD-assisted renters are still eligible for FEMA IHP Other Needs Assistance and should register and apply to see what they qualify for.
 - b. **Public housing and housing choice vouchers:** If individuals who lived in public housing or have a HUD housing choice voucher before a disaster become displaced, they should be directed to their local public housing agency (PHA).
 - c. **Tribal lands:** If individuals received Native American housing assistance before the disaster, they should contact their tribe or Tribally Designated Housing Entity.
 - d. **Multifamily Housing:** Individuals in multifamily housing are directed to their landlord or property manager for information regarding the status of their unit.

- e. **RUSH:** RUSH gives communities much-needed resources to provide long-term housing solutions for people experiencing pre-disaster homelessness and to prevent long-term homelessness among newly displaced people.
11. Communication and outreach to survivors and all levels of leadership.

Interim and Long-Term Phases

During the interim phase, the focus of housing recovery efforts is to plan, identify funding resources and start to provide permanent housing options to survivors through repairing or rehabilitating existing units or building new units, rehabilitation or building new housing units.

During the long-term phase, the focus is on actions taken to identify “return to normalcy” goals and plans, integrate ongoing work into steady-state housing strategies, and continue the process of rebuilding the physical, social, environmental, and economic components of the impacted communities. While this phase is implemented in the latter part of the recovery, planning for these actions should occur concurrently with earlier phases to leverage the investment of prior housing work and approaches.

The post-disaster housing recovery strategy for the interim and long-term recovery phase can include the following:

1. Process and procedures to do the following:
 - a. Identify partners for disaster recovery, and coordinate actions,
 - b. Coordinate Permanent Housing Phase Permanent Housing Phase delivery of federal disaster assistance,
 - c. Seek input from agencies and organizations that can assist with disaster housing recovery efforts,
 - d. Identify and provide public information on resources and programs,
 - e. Expedite building safety inspections, and
 - f. Assist in resolving issues associated with building codes.
2. Program closeout goals and financial closeout plans,
3. Integration into steady-state housing strategies,
4. Federal, state, and local stakeholders work to create Long-Term Recovery Groups (LTRGs) to ensure there are no unmet survivor needs, and
5. Communication and outreach to survivors and all levels of leadership.

The post-disaster housing recovery strategy for the permanent housing planning and implementation can include the following:

1. Identify the agency and/or individual who will serve as the lead for the planning and execution of housing restoration or development activities, including permit and code inspections and housing counseling.
2. How the SLTT will determine long-term housing needs and prioritize options such as homeowner/homebuyer/rental units, permanent housing repairs, rehabilitation, and new construction, and/or buyouts/relocation.
 - a. During recovery from declared disasters, HUD grantees can reprioritize their annual funding in their Annual Action Plans to support the jurisdiction in addressing recovery challenges.
3. Pre-identify sources and processes for disaster case management and wraparound supportive services.
4. Current baseline recovery resources, capabilities, and capacity, including the following:
 - a. Potential permanent housing construction solutions,
 - b. Approved contractors list for rehabilitation/new construction work (including out-of-state contractors with license reciprocity), and
 - c. Sites available to be converted from interim to permanent housing.
5. An understanding of differing resources (e.g., funds for repair/rehabilitation/new construction, rental subsidies, mortgage payment relief) to single-family housing owners, multifamily housing owners, renters, and individuals experiencing or at risk of experiencing homelessness.
 - a. FEMA and HUD offer different housing assistance for individuals based on their expressed needs. Eligibility based on agencies may differ, always refer to agencies for most up to date information. Some options include:
 - i. Home repair/rehabilitation/new construction
 1. **FEMA Permanent Housing Construction (PHC):** Home repair and/or construction services provided in insular areas outside the continental U.S. and in other locations where no alternative housing resources are available and where types of housing assistance FEMA normally provides are unavailable, infeasible, or not cost-effective. For additional information refer to the Individual Assistance Program and Policy Guide (IAPPG).
 - ii. Financial Assistance
 - b. Other Needs Assistance
 - i. Housing-related items that can be covered under this assistance include damaged essential household items as well as moving and storage needs.
 - ii. FEMA will also fund accessibility related repairs, replacement for DME required when a disability is directly caused by the disaster itself. These accessibility-related costs are funded outside the IHP cap.
 - c. FHA and USDA resources

- i. FHA Mortgage Insurance (Section 203(h)) for Disaster Victims insures mortgages for homes destroyed by disasters.
 - ii. FHA Rehabilitation Mortgage Insurance (203k) insures mortgages that can cover both the acquisition and rehabilitation of qualifying properties.
 - iii. USDA Disaster Housing Programs offers loan programs for disaster-impacted housing in rural areas.
- 6. SLTT governments can set the stage to receive potential CDBG-DR resources. Having scalable housing plans that can include plans for receipt of CDBG-DR funds will set the SLTT agencies up for success in long-term recoveries when CDBG-DR funds have been allocated. **CDBG-DR is never guaranteed, and SLTT governments should always identify alternative funds to support recovery efforts.**
 - a. When appropriated by Congress, CDBG-DR grant funds provide crucial support to start the long-term recovery process. These flexible grants help cities, counties, tribes, and states recover from Presidentially declared disasters, especially in low-income areas, subject to the availability of supplemental appropriations. Since CDBG-DR assistance may fund a broad range of recovery activities, HUD can help communities and neighborhoods that otherwise might not recover due to limited resources.
- 7. Using Section 108 program funding, which grantees can access through the CDBG program, to receive up to five times their annual grant allocation to access low-cost, adaptable financing for community and economic development-related projects.
- 8. Process and procedures to do the following:
 - a. Involve local stakeholders,
 - b. Expedite administrative processes such as enforcement of codes, ordinances, permit requirements, and licensing of out-of-state contractors,
 - c. Increase the capacity of the SLTTs insurance department to manage issues and complaints related to settlement claims,
 - d. Prevent fraudulent and predatory contracting,
 - e. Provide technical assistance after a disaster,
 - f. Monitor and evaluate housing programs, and
 - g. Ensure that plans in place address the needs of special populations (e.g., persons with disabilities, limited English proficiency, and families with children).
- 9. Key partners and their roles.
- 10. All agreements planned or in place with other SLTTs, jurisdictions, and partners.
- 11. Potential resource and capacity shortfalls and how they will be addressed.
- 12. Risks or threats and how they will be addressed.
- 13. Communication and outreach to survivors and all levels of leadership.

APPENDIX A: LIST OF ACRONYMS

ADAAG	Americans with Disabilities Act Accessibility Guidelines
ADU	Accessory Dwelling Units
AHP	Affordable Housing Program
BCEGS	Building Code Effectiveness Grading Scheduling
BRIC	Building Resilience Infrastructure and Communities
CBRNE	Chemical, Biological, Radiological, Nuclear, and Explosives
CDBG	Community Development Block Grant
CDBG-DR	CDBG Disaster Recovery
CHDO	HOME Community Housing Development Organization
CLTS	Community Land Trusts
CRS	Community Rating Systems
DHTF	Disaster Housing Task Force
EAH	Employer-Assisted Housing
EMAC	Emergency Management Assistance Compact
FEMA	Federal Emergency Management Agency
FHLB	Federal Home Loan Banks
HA	Housing Assistance
HFA	Housing Finance Agency
HOME	HOME Investment Partnership Program
HTC	Historic Tax Credits
HTF	Housing Trust Fund
HUD	Department of Housing and Urban Development
ITCS	Investment Tax Credits
LECS	Limited Equity Cooperatives
LIHTCS	Low-Income Housing Tax Credits
LTRG	Long-Term Recovery Groups

MHU	Manufactured Housing Units
MLR	Multifamily Lease and Repair
MOU	Memoranda of Understanding
MPO	Metropolitan Planning Organizations
NGO	Non-Governmental Organization
NMTCS	New Markets Tax Credits
ONA	Other Needs Assistance
OZS	Opportunity Zones
PACE	Property Assessed Clean Energy
PBCA	Project-Based Contract Administrators
PHA	Public Housing Agency
PHC	Permanent Housing Construction
PIH	Public and Indian Housing
PII	Personal Identifiable Information
PILOT	Payment in Lieu of Taxes programs
PJ	Participating Jurisdiction
PRO Housing	Pathways to Removing Obstacles to Housing
RAPT	Resilience Analysis and Planning Tool
RSF	Recovery Support Function
RUSH	Rapid Unsheltered Survivor Housing
RV	Recreational vehicles
SBA	Small Business Administration
Section 108	Section 108 Loan Guarantee
SLTT	State, Local, Territorial, and Tribal
SPR	Stakeholder Preparedness Review
THIRA	Threat and Hazard Identification and Risk Assessment
TIF	Tax Increment Financing
TOPA	Tenant Opportunity to Purchase Act
TSA	Transitional Sheltering Assistance
TTHU	Transportable Temporary Housing Units
VOAD	Voluntary Organization Active in Disasters

APPENDIX B: GLOSSARY

Accessory Dwelling Units. A smaller, independent residential dwelling unit located on the same lot as a stand-alone (i.e., detached) single-family home.

Affordable Housing. In general, housing for which the occupant(s) is/are paying no more than 30 percent of his or her income for gross housing costs, including utilities. Some jurisdictions may define affordable housing based on other, locally determined criteria, and this definition is intended solely as an approximate guideline or general rule of thumb.

Bridge Loans. A short-term loan is used until the borrower secures permanent financing or pays an existing obligation. It allows the borrower to meet current obligations by providing immediate cash flow.

Brownfields. Abandoned, idled, and underused industrial and commercial facilities where expansion and redevelopment are burdened by real or potential environmental contamination.

Community Land Trusts. Community land trusts preserve long-term affordable housing by purchasing homes in their communities and then selling the homes to income-eligible buyers while retaining ownership of the land. The homeowners lease the land from the community land trust using a long-term ground lease with affordable monthly ground rents. The ground lease includes provisions that preserve long-term affordability, including restrictions on the future sales price of the home and the income levels of future homeowners.

Declared Federal Disasters. There are two types of disaster declarations provided for in the Stafford Act: emergency declarations and major disaster declarations. Both declaration types authorize the President to provide supplemental federal disaster assistance. However, the events related to the two different types of declaration and the scope and amount of assistance differ.

Deed Restricted Homeownership. Deed-restricted homeownership is a mechanism for preserving the long-term affordability of units whose price was reduced to below-market levels through a government or philanthropic subsidy, inclusionary zoning or affordability incentive.

Density Bonuses. Density bonuses encourage the production of affordable housing by allowing developers to build more units than would ordinarily be allowed on a site by the underlying zoning code in exchange for a commitment to include a certain number of below-market units in the development.

Dillon Rule. States in which localities and governing bodies can only act where they have been delegated authority to do so by the State. If there is a reasonable doubt whether the locality's legislative power exists, the doubt must be resolved against the local governing body.

Disaster Case Management. Disaster Case Management is a time-limited collaboration between a trained case manager and a disaster survivor involving the development of a disaster recovery plan and a mutual effort to meet those disaster-caused unmet needs described in the plan.

Duplication of Benefits. Assistance is provided from different sources for the same specific need.

Federal Register. Published by the Office of the Federal Register, National Archives and Records Administration (NARA), the Federal Register is the official daily publication for rules, proposed rules, and notices of federal agencies and organizations, as well as executive orders and other presidential documents.

Home Rule. States in which localities are determined to have the inherent authority to exercise powers that promote the public health, safety or welfare, even if they are not expressly enabled.

Land Bank. A governmental or nongovernmental nonprofit entity established, at least in part, to assemble, temporarily manage, and dispose of vacant land for the purpose of stabilizing neighborhoods and encouraging re-use or redevelopment of urban property.

Long-Term Recovery. The long-term processes associated with rebuilding the physical, social, environmental, and economic components of a community, region, state, or nation. Long-term recovery is typically used to refer to the period after short-term recovery concludes and can last from months to years.

Low-Income Housing Tax Credits. A tax incentive intended to increase the availability of low-income housing. The program provides an income tax credit to owners of newly constructed or substantially rehabilitated low-income rental housing projects.

Medicaid Waivers. States seeking additional flexibility in the design of their Medicaid programs may apply for formal waivers of some statutory requirements from the Secretary of the U.S. Department of Health and Human Services (HHS). States can use waivers to offer a specialized benefit package to a subset of Medicaid beneficiaries, to restrict enrollees to a specific network of providers, or to extend coverage to groups beyond those defined in Medicaid law. States can also use waivers to make policy changes to respond to disasters and public health emergencies.

Multifamily Loans. Multifamily loans are the process of providing financing for the purchase or renovation of multifamily properties. These loans are typically used by investors who are looking to buy and hold these types of assets. Multifamily loans can be obtained from a variety of sources, including banks, credit unions, and private lenders.

Mutual Aid Agreements. A prearranged agreement between adjoining jurisdictions or SLTT governments to provide aid (e.g., resources or personnel) to one another when one of the jurisdictions is impacted by a disaster.

Porting. Rental subsidy porting allows housing voucher recipients to transfer benefits from one jurisdiction to another to help relieve pressure on limited supply of post-disaster rental housing units.

Pre-Disaster Housing Plans and Strategies. Strategies and documents developed in advance of a disaster that outline how the SLTT government will manage the housing recovery process for the disaster-impacted area.

Property Acquisitions. Through its Hazard Mitigation Assistance grant programs, FEMA funds the voluntary acquisition of hazard-prone properties from private owners. As a condition of the grant, the relevant state, tribal, territorial, or local government must maintain the property as open space in perpetuity. The associated deed restriction stipulates allowable land use and other conditions for the property.

Public Property. Public property refers to property owned by the government rather than by a private individual or a company. It belongs to the public at large.

Qualified Opportunity Zone Funds. An economically distressed community where new investments, under certain conditions, may be eligible for preferential tax treatment. Localities qualify as Qualified Opportunity Zones if they were nominated for that designation by a state, the District of Columbia, or a U.S. territory, and that nomination was certified by the Secretary of the U.S. Treasury via his delegation of authority to the Internal Revenue Service. A qualified Opportunity Fund is an investment vehicle that files either a partnership or corporate federal income tax return and is organized for the purpose of investing in Qualified Opportunity Zones property.

Rainy Day Funds. Funds set aside or earmarked by a government to be used during a time of revenue shortfalls, budget deficits, or exceptional costs such as those incurred during disaster recovery.

Recovery. Those capabilities necessary to assist communities affected by an incident to recover effectively, including, but not limited to, rebuilding infrastructure systems; providing adequate interim and long-term housing for survivors; restoring health, social, and community services; promoting economic development; and restoring natural and cultural resources.

Resilience. The ability to prepare for and adapt to changing conditions and recover rapidly from operational disruptions. Resilience includes the ability to withstand and recover from deliberate attacks, accidents or naturally occurring threats or incidents.

Risk Assessment. A formal risk assessment consists of employing software programs or recognized expert analysis to assess risk trends. Examples of informal assessments include a manual study of fire loss, burn injuries or life loss over a period of time and the causative factors for each occurrence.

Robert T. Stafford Disaster Relief and Emergency Assistance Act. The Act constitutes the statutory authority for most Federal disaster response activities, especially as they pertain to FEMA and FEMA programs.

Sequence of Delivery. The sequence of delivery establishes the order in which disaster relief agencies and organizations provide assistance to disaster survivors. This is intended to prevent duplication of benefits, maximize available resources, and coordinate efforts to help disaster survivors navigate the recovery process.

Short-Term Recovery. The phase of recovery, which addresses the health and safety needs beyond rescue, the assessment of the scope of damages and needs, the restoration of basic infrastructure, and the mobilization of recovery restarting and/or restoring essential services for recovery decision making.

Social Impact Bonds. A contract with the public sector, whereby it pays for better social outcomes in certain areas and passes on part of the savings achieved to investors.

Steady-State. A state where operations and procedures are normal and ongoing. Communities are considered to be in a steady state prior to disasters and after recovery is complete.

Transportable Temporary Housing Unit: A readily fabricated dwelling (i.e., a Recreational Vehicle [RV] or a Manufactured Housing Unit [MHU]) purchased or leased by FEMA and provided to eligible applicants for use as temporary housing for a limited period of time.

Unmet Needs. A deficit between verified disaster-caused damages and obtainable disaster aid, including insurance assistance, Federal and State assistance, and personal resources.

APPENDIX C: AUTHORITIES AND FOUNDATIONAL DOCUMENTS

Laws

Robert T. Stafford Disaster Relief and Emergency Assistance Act (Public Law 93-288, as amended, 42 U.S.C. §§ 5121–5207)

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) authorizes the programs and processes by which the Federal Government provides disaster and emergency assistance to state, local, and territorial governments; tribal nations; eligible private non-profit organizations; and individuals affected by a declared major disaster or emergency. The Stafford Act covers all hazards, including natural disasters and terrorist events.

Policy and Guidance

National Disaster Recovery Framework, November 2011

The NDRF is intended to work in concert with the National Response Framework (NRF) to provide organizing constructs and principles solely focused on disaster recovery. Recognizing the continuum between preparedness, response, recovery, and mitigation, the NDRF transitions with and continues beyond the scope of the National Response Framework.

References

Table 1 lists key references that include useful guidance, best practices, and other resources related to pre-disaster housing planning and strategy development.

Table 1: Key References and Foundational Documents

Reference	Description
Census Bureau and HUD - American Housing Survey	Provides current information on the size, composition, and quality of the nation's housing and measures changes in the housing stock as it ages. The survey provides information about the quality and cost of housing in the United States and major metropolitan areas.

Reference	Description
EMAC – Emergency Management Assistance Compact	EMAC offers assistance during governor-declared states of emergency or disaster through a responsive, straightforward system that allows states to send personnel, equipment, and commodities to assist with response and recovery efforts in other states.
Enterprise Community Partners – Business Continuity Toolkit for Affordable Housing Organizations	Equips multifamily affordable building owners & managers with a plan to address the crisis.
Environmental Protection Agency – Adaptation Resource Center (ARC-X)	ARC-X is an interactive resource to help local governments effectively deliver services to their communities. Once users select areas of interest, they will find information about the risks posed by the climate to the issues of concern, relevant adaptation strategies, case studies illustrating how other communities have successfully adapted to those risks and tools to replicate their successes, and EPA funding opportunities.
FEMA – Community Disaster Resilience Zones (CDRZ)	Community Disaster Resilience Zones will build disaster resilience across the nation by driving federal, public and private resources to the most at-risk and in-need jurisdictions. Using the National Risk Index datasets, FEMA has identified the most at-risk and in-need communities to create resilience zones. These designated zones will provide geographic focus for financial and technical assistance from public, private and philanthropic agencies and organizations for the planning and implementation of resilience projects. This support is for the planning and implementation of resilience projects that will help communities reduce the impact of the climate and other natural hazards.
FEMA - Comprehensive Preparedness Guide (CPG) 101	Provides guidelines on developing emergency operations plans. It promotes a common understanding of the fundamentals of community-based, risk-informed planning and decision making to help planners examine a threat or hazard and produce integrated, coordinated, and synchronized plans.
FEMA - Community Engagement Toolkit	A series of tools for planning community engagement to be more purposeful, equitable, transparent, and strategic so that community members are true partners in achieving impact. The toolkit requires registration to access.
FEMA – Community Rating System	The Community Rating System (CRS) is a voluntary incentive program that recognizes and encourages community floodplain management practices that exceed the minimum requirements of the National Flood Insurance Program (NFIP). Over 1,500 communities participate nationwide.
FEMA – Hazard Mitigation Plan	Hazard mitigation lessens the impact of disasters by reducing loss of life and property. Hazard mitigation plans raise awareness of hazards, risks and vulnerabilities. They also identify ways to reduce risk and focus state resources on the greatest risks. The state mitigation plan reduces risk to key

Reference	Description
	assets in the long term. It also gives jurisdictions within the state information about the state's risks, capabilities, priorities and action plans. This helps local governments develop and update their hazard mitigation plans.
FEMA - Homeland Security Exercise and Evaluation Program	Provides a set of guiding principles for exercise and evaluation programs, as well as a common approach to exercise program management, design and development, conduct, evaluation, and improvement planning.
FEMA - Individual Assistance Program and Policy Guide (IAPPG)	The IAPPG consolidates information on all of FEMA's Individual Assistance programs and activities and provides a comprehensive policy resource for SLTT governments, non-governmental organization partners, and entities that participate in or support the recovery of disaster survivors.
FEMA - National Disaster Recovery Framework (NDRF)	Enables effective recovery support to disaster-impacted states, tribes, and territorial and local jurisdictions. It provides a flexible structure that enables disaster recovery managers to operate in a unified and collaborative manner. The NDRF focuses on how best to restore, redevelop, and revitalize the health, social, economic, natural and environmental fabric of the community and build a more resilient nation.
FEMA - National Exercise Program	Information and resources for the National Exercise Program are key components in developing a culture of preparedness, empowering communities, and promoting resilience against threats and hazards Americans face.
FEMA - National Risk Index	Includes the dataset and online tool to help illustrate the United States communities most at risk for 18 hazard types. The Risk Index leverages available source data for natural hazards and community risk factors to develop a baseline relative risk measurement for each United States county and Census tract.
FEMA - Planning Considerations: Disaster Housing – Guidance for State, Local, Tribal and Territorial Partners	Supplements CPG 101 and provides guidance on national housing priorities, types of housing, key considerations and housing-specific planning recommendations for state, local, tribal, and territorial jurisdictions to use, in conjunction with the Six-Step Planning Process described in CPG 101, to develop or improve disaster housing plans.
FEMA - Pre-Disaster Recovery Planning Guide for State Governments	Provides guidance to help states and territories prepare for recovery by developing pre-disaster recovery plans that follow a process to engage members of the whole community, develop recovery capabilities across state government and nongovernmental partners, and ultimately create an organizational framework for comprehensive state recovery efforts.
FEMA - Response and Recovery Federal Interagency Operational Plan	Guides federal departments and agencies in executing the response and recovery mission areas of the National Preparedness Goal to achieve Unity of Effort through coordination and communication following an incident for which an interagency response is required.
Health and Human Services - emPower	The HHS emPOWER Program provides federal data, mapping, and artificial intelligence tools, as well as training and resources, to

Reference	Description
	help communities nationwide protect the health of at-risk Medicare beneficiaries, including 4.5 million individuals who live independently and rely on electricity-dependent durable medical and assistive equipment and devices, and/or certain essential health care services.
HUD - Barrier to Affordable Housing	Many communities throughout the country are unable to create, provide, and maintain sufficient affordable housing units. This webpage is designed to assist those communities as they identify and address the barriers that are keeping them from meeting the need for affordable housing.
_____ _____	
HUD - Community Development Block Grant	The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended 42 U.S.C. 5301 et seq. The program was designed to reinforce several important values and principles of community development.
HUD - Duplication of Benefits: Understanding and Applying the Requirements (webinar)	Explains the duplication of benefits requirement, how it applies to grantees and beneficiaries, and examples of how to calculate and evaluate the risk of duplication of benefits.
HUD - FACT SHEET: HUD Deploys First Round of Funding through New Rapid Response Program to Address Homelessness in Areas Hit by Disasters	Rapid Unsheltered Survivor Housing (RUSH) program is a rapid response program to address homelessness by filling in federal assistance gaps in communities hit by disasters.
_____ _____	
HUD - HOME Investment Partnerships Program	The HOME Investment Partnerships Program (HOME) provides formula grants to states and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities, including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest federal

Reference	Description
	block grant to state and local governments designed exclusively to create affordable housing for low-income households
HUD - Housing Trust Fund	The National Housing Trust Fund (HTF) is a new affordable housing production program that will complement existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income households, including homeless families.
HUD - Increasing the Supply of New Affordable Housing: Primer of Strategies to Implement Today	This Primer is a resource for staff or members of State and local governments who are looking to be involved in affordable housing development and implementation in their communities or those who want to partner with municipalities to explore affordable housing development options and explore promising strategies jurisdictions may use to address the affordability gap for low-income residents.
HUD - Pathways to Removing Obstacles to Housing	Communities nationwide are suffering from a lack of affordable housing, and housing production is not meeting the increasing demand for accessible and available units in many urban and rural areas, particularly areas of high opportunity. Pathways to Removing Obstacles to Housing (PRO Housing) supports communities that are actively taking steps to remove barriers to affordable housing.
HUD - Point-in-Time Count and Housing Inventory Count	Provides a count of sheltered and unsheltered people experiencing homelessness on a single night.
HUD - Public Housing Agency Disaster Readiness, Response, and Recovery Fact Sheets	Provides public housing agencies (PHAs) with best practices and resources for preparing for, responding to, and recovering from a natural or manmade disaster.
HUD - Section 108 Loan Guarantee Program	The Section 108 Loan Guarantee Program (Section 108) provides communities with a source of low-cost, long-term financing for economic and community development projects. Section 108 financing provides an avenue for communities to undertake larger, more costly projects where they may have limited resources to invest upfront.
HUD - Training Opportunities	Training opportunities to develop skills, build knowledge, and enhance capacity as they design, implement, and administer their HUD programs.
HUD - Worst Case Housing Needs 2021 Report to Congress	Provides national data and analysis of critical housing problems facing very low-income renting families.
Department of Justice - Guidance to State and Local Governments and Other Federally Assisted Recipients Engaged in Emergency Preparedness, Response, Mitigation, and Recovery Activities on Compliance with Title VI of the Civil Rights Act of 1964	Provides guidance to assist recipients of federal financial assistance engaged in emergency management (e.g., state and local emergency management agencies, law enforcement, healthcare service providers, housing and transit authorities) to ensure that individuals and communities affected by disasters do not face unlawful discrimination on the basis of race, color, or national origin (including limited English proficiency) in violation of Title VI of the Civil Rights Act of 1964 (Title VI).

Reference	Description
<p>VOAD - Long Term Recovery Group – Iowa Voluntary Organizations Active in Disasters “COADS & LTRGS”</p>	<p>A long-term recovery group (LTRG) is a cooperative body that is made up of representatives from faith-based, non-profit, government, business and other organizations working within a community to assist individuals and families as they recover from disaster.</p> <p>LTRGs are as varied in their structure as are the communities in which they work. The personality and operation of each group are unique and reflect local needs, available resources, leadership style, and community support. No matter how a group is structured or what it calls itself, the goal is the same: to unite recovery resources with community needs in order to ensure that the community can recover from a <i>specific</i> disaster.</p>
<p>Insurance Services Office - Building Code Effectiveness Grading Schedule</p>	<p>The Building Code Effectiveness Grading Schedule (BCEGS) program, which influences local fire and building codes, is used by the Insurance Services Office to evaluate how communities enforce their codes through plan reviews and field inspections. The BCEGS program assigns each community a classification from one (exemplary commitment to fire and building code enforcement) to ten. Like the Public Protection Classification, a community with a better BCEGS classification could have lower insurance rates.</p>