



# FEMA Preliminary Damage Assessment Guide

*July 2025*



FEMA



***DRAFT***

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# CHAPTER 1: INTRODUCTION

## Purpose

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

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

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

- Define the information and documentation that FEMA requires during the joint PDA process to assess damage and support requests for Stafford Act assistance;
- Promote a uniform approach by standardizing the processes and criteria used to assess damage to residential homes for Individual Assistance (IA) requirements or assess damage to buildings or infrastructure for Public Assistance (PA) requirements;
- Establish roles, responsibilities, and the process related to the damage assessment framework and standards for teams supporting the joint PDA process;
- Provide SLTT partners with descriptions of common types of Stafford Act damage assessments and the methods for obtaining information for each type; and
- Introduce information and resource requirements for damage assessments.

## How to Read this Guide

The first two chapters of the PDA Guide establish a foundation for the PDA process and describe how to conduct the PDA. Chapter 3 summarizes common damage assessment methodologies. Chapter 4 and Chapter 5 provide operational guidance that is specific to

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<sup>1</sup> Federally recognized Tribal Nations may choose to collaborate with state governments for joint PDAs (in preparation to be a subrecipient or recipient) or may engage with FEMA directly for joint PDAs (in preparation to be a recipient).

conducting IA PDAs and PA PDAs, respectively, including program-specific information on PDA-related requirements.

## Scope and Applicability

PDAs provide valuable information that informs many aspects of the disaster response and recovery process. However, the PDA Guide focuses on damage assessments that support a request for federal assistance through a Stafford Act Presidential disaster declaration.<sup>2</sup> The PDA Guide answers the following questions for SLTT governments seeking information on the PDA process or seeking FEMA assistance:<sup>3</sup>

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

The intended audience of the PDA Guide is SLTT government emergency managers and FEMA staff who conduct IDAs and joint PDAs, validate the results, and provide technical assistance.<sup>4</sup>

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

Following an incident, the FEMA Administrator may delegate additional responsibilities to the Regional Administrator (RA) to conduct activities necessary to prepare and pre-position federal resources for an event for which a declaration under the Stafford Act is reasonably likely and imminent. As PDAs are a responsibility delegated to the RA, and further delegated to the appointed Federal Coordinating Officer (FCO) following the disaster declaration, each FEMA Region and SLTT government should evaluate its need to develop supplemental guidance to address region-specific considerations that may impact the approach and methodology, such as differences in hazard types, damage levels, and SLTT government operational capabilities.

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

<sup>3</sup> The governing body of an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian Tribal Nation under the Federally Recognized Indian Tribe List Act of 1994 (42 U.S.C. 5122).

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



### Key Terms

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

**Applicant:** Individuals, families, states, Tribal Nations, local governments, or private nonprofit organizations who apply for assistance as a result of a declaration of a major disaster or emergency.

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

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

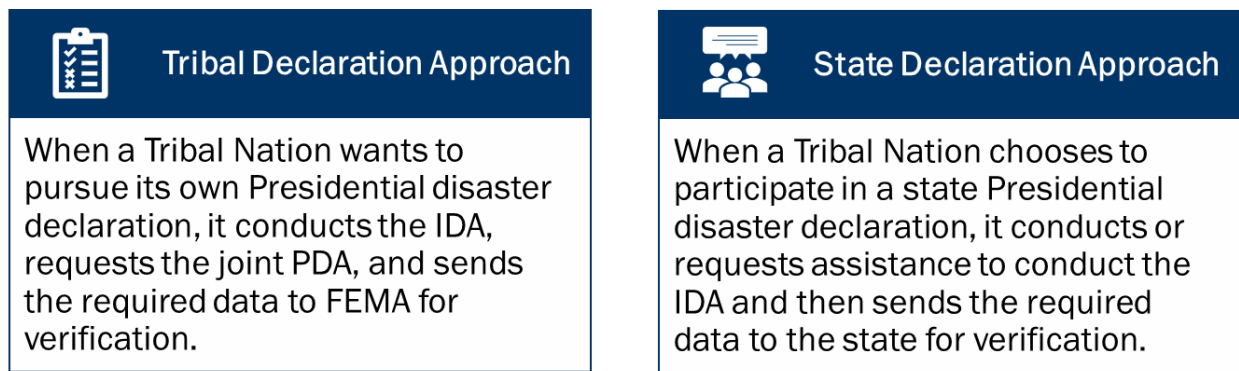
**Preliminary Damage Assessment (PDA):** The PDA is a mechanism used to determine the impact and magnitude of damage and the resulting unmet needs of individuals, businesses, the public sector, and the community as a whole. The PDA consists of the IDA followed by the joint PDA.

**Recipient:** A state or Tribal Nation that receives a federal award directly from FEMA. Generally, the state is the recipient. However, a Tribal Nation may choose to be a recipient or may act as a subrecipient under the state. A Tribal Nation acting as recipient will assume the responsibilities of a “State,” for the purposes of administering the grant.

**Subrecipient:** The government or other legal entity to which a subaward is awarded and which is accountable to the recipient for the use of the funds provided. Subrecipients can be a state agency, local government, private nonprofit organization, or Tribal Nation.

## Tribal-Specific Guidance

The Stafford Act provides Tribal Nations with the authority to request their own major disaster declaration or emergency declaration from the President. In 2013, the Sandy Recovery Improvement Act (SRIA) amended the Stafford Act to provide Tribal Nations with the option to seek Stafford Act assistance independent of a state if they so choose. At their own discretion, Tribal Nations may choose to request a Presidential disaster declaration independently or choose to join a state disaster declaration. Further, Tribal Nations have the flexibility to conduct the PDA process as they see fit in coordination with the applicable FEMA Region. Figure 1 provides a brief overview of how Tribal Nations may approach PDAs.



**Figure 1. Tribal Nations Options for PDAs**

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

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

## Supersession

This document supersedes the 2024 PDA Guide Operational Draft.

## Authorities and Foundational Documents

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

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, 42 United States Code (U.S.C.) §§ 5121 et seq.
- Title 44 of the Code of Federal Regulations (CFR), "Emergency Management and Assistance §§ 206.33 et seq."
- Presidential Policy Directive 8 (PPD-8), "National Preparedness," March 30, 2011.
- Homeland Security Presidential Directive 5 (HSPD-5), "Management of Domestic Incidents," February 28, 2003.
- *National Response Framework* (NRF), October 2019.
- *National Incident Management System* (NIMS), October 2017.
- *National Disaster Recovery Framework*, December 2024.
- *National Mitigation Framework*, June 2016.
- *FEMA Publication 1*, November 2019.

- *Disaster Operations Keystone*, TBD.
- *Joint Recovery Office Guide*, June 2021.
- *FEMA Direct Housing Guide*, July 2021.
- *Individual Assistance Program and Policy Guide v1.1* (IAPPG), FP 104-009-03, May 2021.
- *Individual Assistance Declarations Factors Final Guidance*, June 2019.
- *Public Assistance Program and Policy Guide V. 5* (PAPPG), FP 104-009-2, June 2020.
- *FEMA Tribal Declarations Interim Guidance*, December 2024.
- Sections 308, 309, and 616 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. §§ 5151, 5152, and 5196f.
- Title VI of the Civil Rights Act of 1964.
- Section 504 of the Rehabilitation Act of 1973.
- Title IX of the Education Amendments Act of 1972.
- Age Discrimination Act of 1975.
- *Hazard Mitigation Assistance Program and Policy Guide*, July 2024.

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

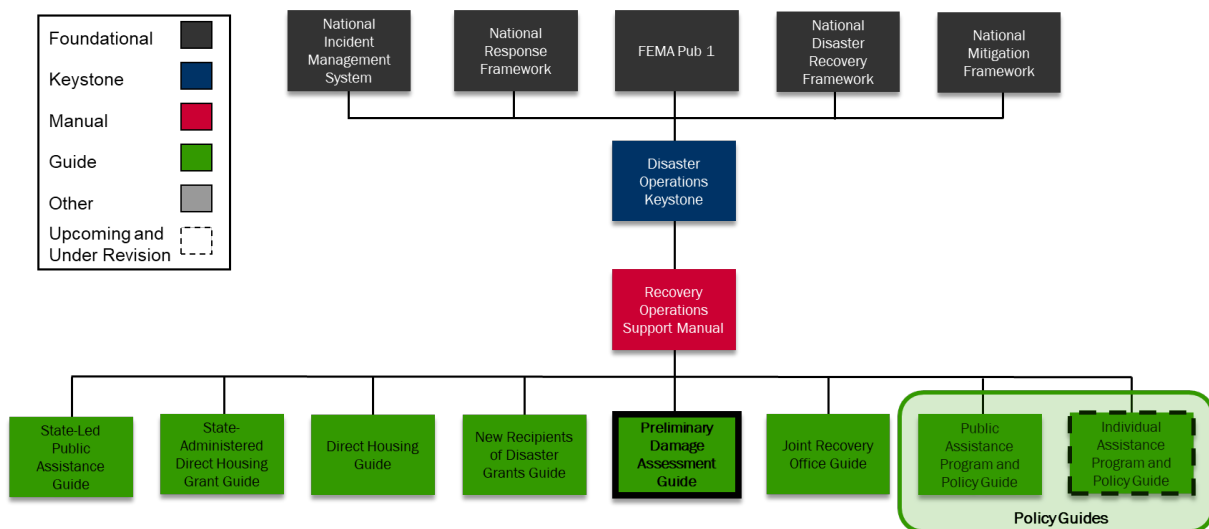


Figure 2. FEMA Doctrine Hierarchy

## Document Management and Maintenance

FEMA ORR's Doctrine and Policy Office is responsible for managing and maintaining this document. Comments and feedback from FEMA personnel and stakeholders regarding this document should be directed to the ORR Doctrine and Policy Office ([FEMA-ORR-Doctrine@fema.dhs.gov](mailto:FEMA-ORR-Doctrine@fema.dhs.gov)) at FEMA headquarters (HQ).

# CHAPTER 2: PRELIMINARY DAMAGE ASSESSMENT OVERVIEW

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

## Process Overview

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

### FEMA Templates and Resources

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

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

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

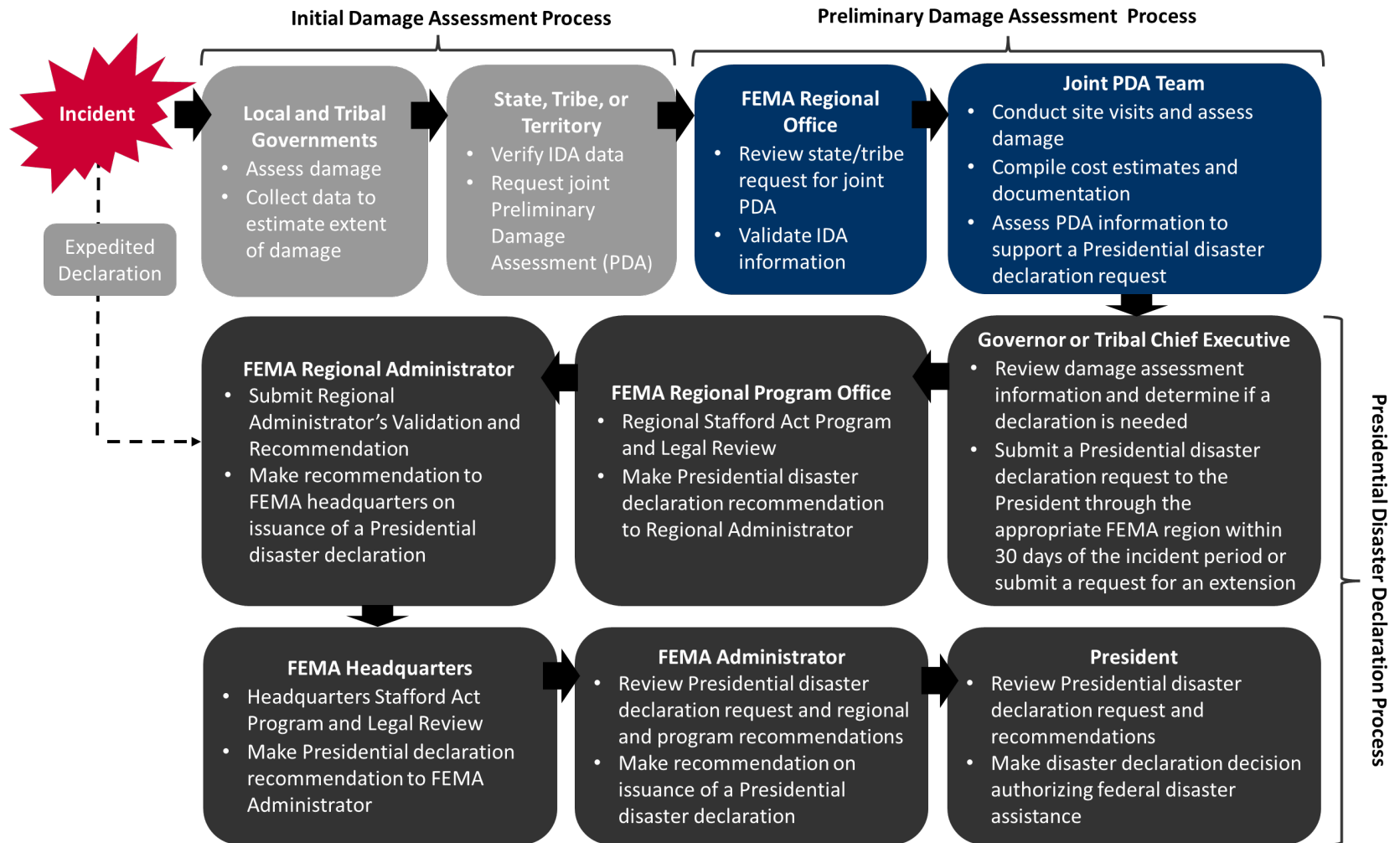


Figure 3. PDA and Presidential Disaster Declaration Process

## Key Objectives of the PDA Process

The data collected through the PDA process plays a crucial role in several key decisions. The PDA informs:

- The state, Tribal Nation, or territorial (STT) government's request for a disaster declaration;
- The RA's recommendation to the FEMA Administrator for the disaster declaration request;
- The FEMA Administrator's recommendation to the President for a disaster declaration request; and
- The STT government's long-term recovery strategy.

Presidential disaster declarations determine which jurisdictions are eligible for FEMA disaster assistance and specify the types of assistance that are available.

## Key Considerations

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

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

Consideration	Description
Hazard or Incident Type	The type, scale, and severity of the incident may influence the required approach and timeline of the preliminary damage assessment (PDA). For example, disasters such as tornadoes and hurricanes may produce readily visible damage (e.g., debris) that may be assessed through windshield surveys, while damage from floods may require more time and resource-intensive door-to-door assessments.
Program Requirements	The federal government's information requirements for Presidential Disaster Declaration requests for Individual Assistance (IA) and Public Assistance (PA), as well as other types of assistance, may impact the PDA process. Other types of federal assistance include FEMA Mitigation and Fire Management Assistance Grants and U.S. Small Business Administration (SBA) loans.
State, Tribal Nation, Territory Resources, Disaster Frequency, and Experience	The capabilities and capacity of the state, Tribal Nation, or territorial (STT) government to conduct an IDA and/or to support the joint PDA may influence which PDA methods are used, such as flyovers, windshield surveys, or door-to-door assessments (see Chapter 3 for more information). The STT government's experience with disasters and their familiarity with the joint PDA process may also impact how damage is assessed.
Time Constraints	Based on the urgency of need resulting from the incident, FEMA and the STT government may establish a timeline for the joint PDA to be completed. This timeline may impact which methods are the most feasible for assessing and documenting damages.
Geographic, Environmental, and Safety Hazards	Geography, environmental, and safety hazards may impact the methods used for assessing and validating damage. On the ground factors may limit access, to include physical access and connectivity in such a way that methods for assessing and validating damages are restricted, requiring innovative approaches without compromising PDA integrity or validity.



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

## Readiness and Planning for Preliminary Damage Assessments

Effective planning and preparation are essential for accurately and efficiently assessing damage. SLTT governments can better prepare themselves to complete an IDA by completing the activities described in Table 2.

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

Activity	Description and Benefit
Develop Standard Operating Procedure	A standard operating procedure (SOP) can help with planning and operational decision making, clarify roles and responsibilities, establish protocols, and streamline decisions following a disaster within a state, local, tribal, and territorial (SLTT) government.
Identify Risks to Critical Infrastructure	Identifying high-risk areas and developing a list of critical infrastructure assets can expedite analysis following a disaster. Planning and zoning maps, as well as Geographic Information System (GIS) technology, can aid in this effort.
Develop a PDA Plan of Action Template	Developing a template for joint preliminary damage assessment (PDA) data that standardizes the collection of disaster information and can expedite development of the PDA plan of action. The template may be included as an addendum to the SOP.
Assemble the Team	Assembling the team with the appropriate expertise prior to a disaster ensures alignment of available resources for lifesaving and life-sustaining operations. In some cases, non-emergency management personnel (who do not have responsibilities immediately following a disaster) can augment teams that would otherwise be impacted by diversions of emergency management personnel.
Pre-Arranged Contracts and Memoranda of Understanding	Prearranged contracts or memoranda of understanding for services, including mobile applications, virtual sensing, or GIS capabilities, can expedite data collection during the initial damage assessment (IDA).
Train Personnel	Offering training to personnel preselected to support damage assessments maintains pre-incident readiness. Training should ensure staff are familiar with damage assessment plans, SOPs, and protocols. Training resources are available at <a href="https://www.fema.gov/PDA">FEMA.gov/PDA</a> .
Conduct Exercises	Conducting exercises can help validate protocols and processes, provide staff with opportunities to operationalize plans, and encourage relationship building among FEMA and SLTT governments.
Use Technology	Understanding technology options that support PDAs (e.g., aerial imagery, ground-level photography, and Artificial Intelligence) ensures relevant stakeholders are familiar with these technologies before an incident.

Activity	Description and Benefit
Data Management	Maintaining data on demographics and insurance coverage levels, having geospatial data mapping and analysis capacity, and establishing pre-existing communication channels with local governments and Tribal Nations as well as SLTT interagency partners facilitates information collection during the IDA.
Establish Partnerships	Developing pre-existing relationships with the SLTT housing, infrastructure, natural resources, cultural resources, arts and humanities, education, and health authorities allows the PDA team to rapidly collect information from these authorities on damage and impacts to these critical systems and activities already taken or underway by their federal counterparts to address impacts.

## PDA Process

Except in the case of an expedited Presidential disaster declaration for a major disaster, PDAs are completed prior to the overall determination of the STT government's eligibility for federal disaster assistance, regardless of which programs the STT government is requesting. To encourage consistency and efficiency, FEMA has developed a PDA process that provides the maximum amount of flexibility given the diversity of disasters, their impacts, and the resources available to support them.

FEMA has standardized two main practices during PDAs:

1. FEMA validates damage, it does not identify damage; and
2. FEMA must visually confirm damage and review documentation to consider damage validated.<sup>5</sup>

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

### Expedited Declarations

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

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

Depending on the extent of damage and accessibility of impacted areas, FEMA may also use alternative methods—such as flyovers or windshield assessments led by a federal official—to validate damage and make the full range of federal assistance available or conduct complete PDA operations at a later date. Refer to [FEMA's declaration guidance](#) for additional information on expedited declarations.

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

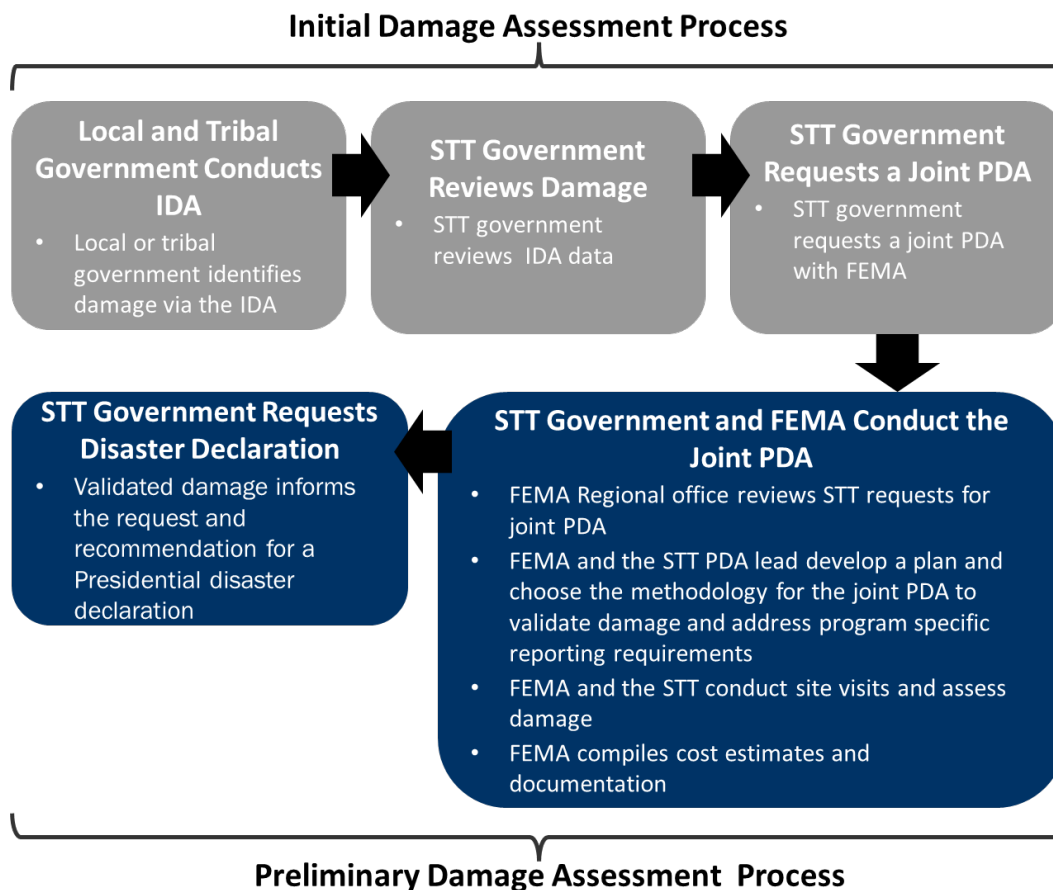


Figure 4. PDA Process

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

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

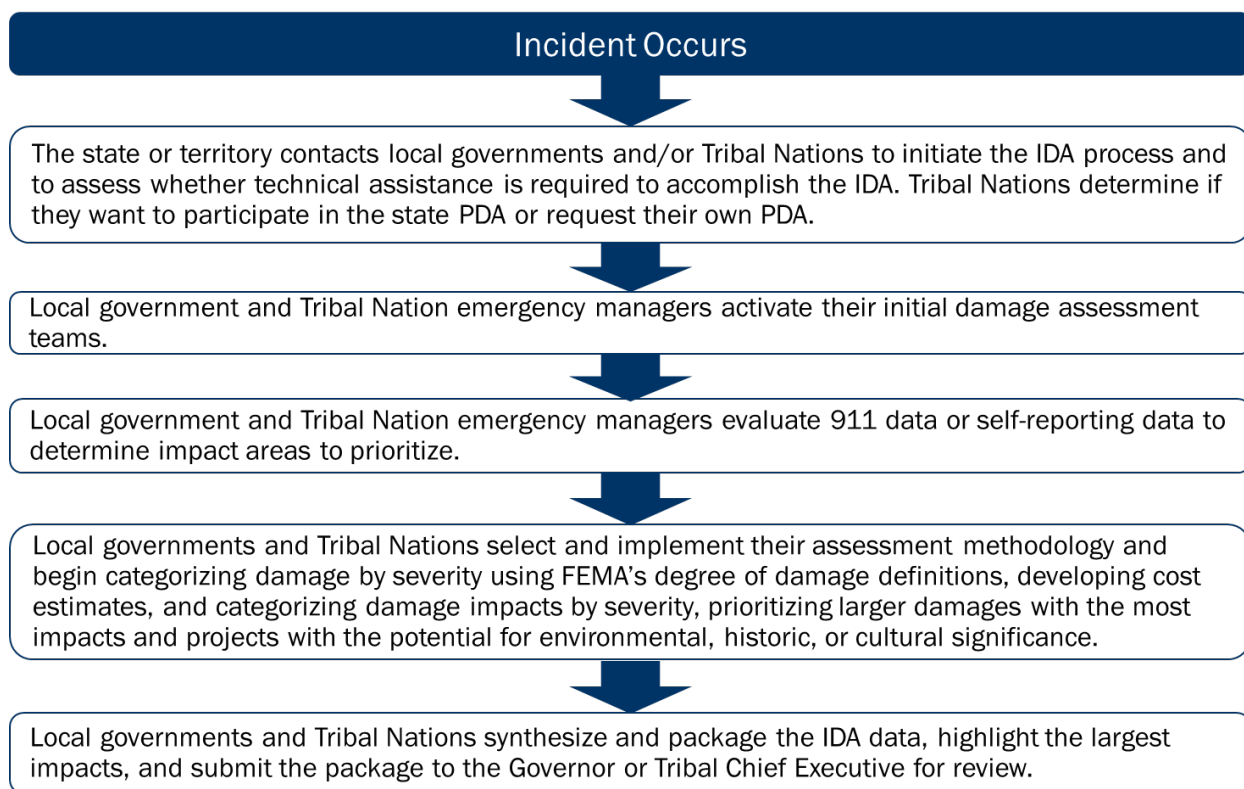
Certain steps may be compressed, executed concurrently, or expedited depending on the specific incident requirements. FEMA Regional offices have wide latitude on how to conduct joint PDAs, which is determined in consultation with SLTT government partners as part of the PDA plan of action.

### Local Government or Tribal Nation Conducts IDA

The IDA provides the basis for determining whether it is necessary to conduct a joint PDA and which FEMA program (IA and/or PA) will be evaluated during the PDA. IDAs capture

damage information and impacts for the joint PDA. Local governments and Tribal Nations are encouraged to capture as much damage as possible during the IDA, as the STT government can remove ineligible damage from the request for federal disaster assistance requesting the joint PDA. If a joint PDA is required, thorough IDAs can expedite the joint PDA process.

During the IDA, the local government or Tribal Nation identifies and categorizes the degree of damage or estimated cost of assistance in its jurisdiction and records all other information or data that might support the need for additional resources, such as the capacity of local resources to support response and recovery efforts. While conducting the IDA, the local government or Tribal Nation may receive support from the state, the territory, or Non-Governmental Organizations (NGO). In some cases, a territory may not include a local government, and the territorial government conducts the IDA. Similarly, the state may conduct the IDA in areas where the local government does not have the capacity to do so. The roles and responsibilities of STT government are flexible and can be adjusted based on the needs and capacity of the local government. Figure 5 provides an overview of the IDA process.



**Figure 5. The IDA Process**

The local government or Tribal Nation should collect a variety of disaster-related information to lend substantive, data-driven context to requests for Stafford Act assistance. This information should illustrate the overall impact of the damage and underscore how the supplemental resources of the federal government are necessary to support disaster survivors, the community, and its infrastructure. The local government or Tribal Nation documents damage by taking pictures with geotags, using Geographic Information System (GIS) capabilities, and using drones from local, Tribal Nation, or state agencies to share imagery with the regional PDA teams to validate.

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

## STT Government Reviews Damage

Following the IDA, the local government or Tribal Nation sends the data it collected to the state or territorial government. To request assistance separately from a state, a Tribal Nation can submit its IDA data directly to FEMA. The state or territory validates data from the most impacted areas before requesting a joint PDA from FEMA.

### Tribal Legal Requirements

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

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

### Technical Assistance

Prior to a joint PDA request, the STT government may request technical assistance from the appropriate FEMA Region to support efforts to evaluate the information submitted by local jurisdictions and/or to analyze the need for a joint PDA. Technical assistance may include support from the following:

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

Validating IDA information ensures that it is accurate and can be used to support an efficient joint PDA with FEMA. Table 3 lists common validation methods STT governments may use for IA and PA disaster declaration requests.

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

Program	Validation Method
Individual Assistance	<ul style="list-style-type: none"> <li>• Reviewing and analyzing photographs of a sample of disaster-impacted homes to ensure that local and Tribal Nations are categorizing degrees of damage correctly,</li> <li>• Visiting areas with the most impacts in person,</li> <li>• Evaluating basic IA eligibility requirements, and</li> <li>• Reviewing insurance policy information.</li> </ul>
Public Assistance	<ul style="list-style-type: none"> <li>• Evaluating basic PA eligibility requirements;</li> <li>• Reviewing and analyzing photographs of damaged buildings and infrastructure;</li> <li>• Reviewing contracting or force account labor documentation;</li> <li>• Conducting site assessments, especially sites with complex damage, to help in establishing a more accurate cost estimate; and</li> <li>• Reviewing insurance policy information.</li> </ul>

States and territories can lessen the time required to validate damage by working with local or Tribal Nation emergency managers to assess whether the information submitted is complete and aligned with established FEMA damage assessment and programmatic eligibility standards, and by providing technical expertise to local damage and impact assessment efforts.

## STT Government Requests Joint PDA

If the incident is of such severity and magnitude that the resources needed to recover are expected to exceed the STT government's capability, the director of the STT emergency management agency requests a joint PDA. The joint PDA request is made by submitting a joint PDA request signed by the governor, the Tribal Chief Executive (TCE), the Governor's Authorized Representative, the Tribal Authorized Representative, or another authorized representative of the STT government to the appropriate FEMA Regional office. The joint PDA request should contain a list of disaster-impacted locations, a basic joint PDA plan of action, and the impact statement. FEMA does not impose specific requirements on how STT governments conduct IDAs or validate the information. However, when requesting a joint PDA, the STT government should provide the following information to the FEMA Regional Recovery Division depending on the incident type and scale:

- The type of damage to be validated, such as private (non-agricultural) and public, debris damage, emergency protective activities, and/or private nonprofits (PNP) and public facilities;
- The estimated costs for each category of work;
- The date the damage occurred;



- Location and geographic spread of the damage, whether it is an urban or rural area, the type of terrain, the accessibility to the area, and the counties, parishes, and municipalities impacted by the damage;
- Magnitude and severity of damage and all estimates from the IDA;
- Immediate known problems, such as:
  - Areas inaccessible because of debris, high water, or damage to streets, roads, and bridges;
  - Serious health hazards, including exposure to hazardous weather;
  - Requirements for emergency protective measures;
  - Damage to critical infrastructure, such as roads, bridges, railways;
- Widespread loss of critical facilities—including hospitals and grocery stores—and essential utilities and shortages of food, water, and medical supplies;
- Summary of recent disaster declarations, including incidents when a disaster declaration was not granted;
- Summary of similar damage or repetitive damage from past declared or non-declared incidents;
- Summary of the population impacted by the event; and
- Summary of activities taken by Other Federal Agencies (OFA), if any, for coordination.

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

### ***STT Government Does Not Request Joint PDA***

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

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

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

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

### *STT Government Develops Joint PDA Plan of Action*

The STT government, with assistance from the FEMA Regional office, coordinates with county or local jurisdictions included in the joint PDA request to develop a joint PDA plan of action.

The joint PDA plan of action for IA requests should include:

- The methodology for validating degree of damage information, such as door-to-door assessments, windshield surveys, or other methods;
- A strategy for managing inquiries from the media, developed with input from the Office of External Affairs (OEA);
- The number of homes with destroyed, major, minor, and affected damage;
- The number of homes that are inaccessible;
- A list of residential streets that are inaccessible;
- A list of streets that have lost utilities services;
- A schedule for assessing damaged homes or neighborhoods, coordinated with local governments, prioritizing the most heavily impacted areas and homes first;
- A route for site visits developed with local government and GIS specialists; and
- A list of PDA team members and a list of team requirements, including special considerations that may require additional support from FEMA, such as language or translation support and any specialized assistance.

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

- The methodology for validating damage and potential damage cost estimates and reviewing detailed engineer cost estimates, such as site assessments;
- A strategy for managing inquiries from the media, developed with input from OEA;
- A list of the most extensive damages and their locations;
- A schedule for assessing sites or interviewing Applicants, coordinated with local governments, prioritizing the most heavily impacted areas first;
- A route for site visits developed with local government and GIS specialists; and
- A list of PDA team members and a list of team requirements, including special considerations that may require additional support from FEMA, such as language or translation support and any specialized assistance.

FEMA IA and/or PA specialists should coordinate with the STT emergency management agency to discuss the validated information submitted as part of the joint PDA request and develop an overall joint PDA plan. FEMA may also consider other data when developing the joint PDA plan of action.

Before conducting a joint PDA, the STT leads an initial briefing—with support from FEMA—to present the joint PDA plan of action to the joint PDA team, including disaster and impact

specifics, team breakdowns, communications and reporting requirements, and safety requirements.

The FEMA Regional office identifies FEMA joint PDA leadership, deploys staff, and coordinates with OFAs, such as the US Army Corps of Engineers (USACE), the U.S. Small Business Administration (SBA), the Environmental Protection Agency (EPA), the Natural Resource Conservation Service (NRCS) and other traditional Recovery partners. STT emergency management officials identify their joint PDA leadership, as well as staff that can serve on joint PDA field teams.

### *Joint PDA Team Conducts Damage Assessments*

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

#### **FEMA Attire and Badges**

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

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

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

- The joint PDA team has collected data that captures the overall impact of the incident;
- FEMA has a clear understanding of the scale and scope of the incident in order to determine if a declaration is warranted; and
- FEMA can adequately plan for the staffing and program delivery requirements for field operations and a properly scaled Joint Field Office (JFO) with associated field offices and Disaster Recovery Centers.

Local authorities help prioritize damage sites and locate previously recorded damage during the joint PDA. STT and FEMA representatives validate damage recorded during the IDA through visual confirmation and by compiling site visit summaries and damage estimates. Joint PDA field teams are primarily intended to validate—not find—damage already identified and validated by SLTT

government officials. However, joint PDA teams are encouraged to capture and validate any and all damage identified by SLTT partners during the IDA.

#### **Data Sharing**

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

The amount of damage that requires validation by FEMA depends on each individual disaster. Damage should be validated to the fullest extent possible. Even within the same disaster, jurisdictions that sustained different types of damage may require different validation approaches that must be discussed by joint PDA teams.

#### ***SLTT Governments and FEMA Compile and Share Data***

Throughout the joint PDA process, FEMA and SLTT government staff regularly discuss their findings and reconcile differences to reach a consensus. While discrepancies may exist, the decision-making rationale should be transparent. After joint PDA teams conduct damage assessments, FEMA provides STT emergency management officials with a final summary of the joint PDA findings, including validated cost estimates for PA and assistance cost calculations for IA.

#### ***STT Governments and FEMA Assess and Validate Data***

The PDA team conducts a final briefing to finalize all PDA summaries and reach a consensus on the damage estimates. STT governments and FEMA validate data by assessing whether information is accurate, complete, and sufficiently detailed. The final PDA reports are then submitted to STT leadership.

Final PDA reports do not constitute an official eligibility determination for IA or PA. STT governments are encouraged to submit additional documentation to expand on the impact statement and address the IA, PA, or/or Tribal Nation declaration factors as part of a formal request for a Presidential disaster declaration. FEMA reviews this documentation prior to making a recommendation to the President for providing federal assistance.

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

STT government leadership reviews the damage information validated through the joint PDA. Based on this information, the STT government decides whether to request a Presidential

disaster declaration. The governor or TCE makes the request to the President through the appropriate FEMA RA.

## STT Government Requests Presidential Disaster Declaration

Impacted states and territories that have decided to pursue a Presidential disaster declaration must submit a [Request for Presidential Disaster Declaration](#) to their FEMA Regional program office within 30 days of the end of the incident period. Tribal Nations must submit a request for a major disaster declaration to their FEMA regional program office within 60 days of the end of the incident period. Requests for deadline extensions must be submitted within 30 days of the end of the incident period for states and territories and within 60 days of the end of the incident period for Tribal Nations.<sup>6</sup>

### Declaration Request Extensions

The Associate Administrator for Response and Recovery may extend the deadline if the governor submits a written request and justification within the 30-day time period or if the TCE submits a written request and justification within the 60-day time period. FEMA may grant extensions when an STT government needs additional time to conduct a PDA if an impacted jurisdiction is:

- Strained by multiple events,
- Conducting continued response efforts, or
- Unable to access impacted areas because of sustained incident conditions.

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

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

1. The IA program: Assistance to individuals and households, as well as SLTT governments, to support individual disaster survivors;

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

2. The PA program: Assistance to SLTT governments and eligible PNPs for eligible debris removal, life-saving emergency protective measures, rebuilding damaged facilities, and restoring public infrastructure, including PA hazard mitigation; and
3. The Hazard Mitigation Grant Program: Assistance to help communities implement hazard mitigation measures following a major disaster declaration in the areas of the STT to reduce the risk of loss of life and property from future disasters.

#### Cumulative Effect of Recent Disasters

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

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

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

## PDA Roles and Responsibilities

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

**Table 4. Key Roles and Responsibilities in the Joint PDA Process**

Component	Roles and Responsibilities
Local Government	<ul style="list-style-type: none"> <li>• Conducts the initial damage assessment (IDA),</li> <li>• Shares damage information with the state, and</li> <li>• Participates in the joint preliminary damage assessment (PDA).</li> </ul>
Tribal Nation	<p>At its discretion, the Tribal Nation can take on different roles, depending on how it chooses to request disaster assistance from FEMA. The Tribal Nation may pursue its own declaration, participate in the state declaration, or alternate between the two. Under these circumstances, the Tribal Nation may coordinate with the FEMA Region to change its roles and responsibilities throughout the PDA process.</p> <ul style="list-style-type: none"> <li>• A Tribal Nation that chooses to participate in a state Presidential disaster declaration request conducts an IDA, shares information with the state, and participates in the joint PDA.</li> </ul>



Component	Roles and Responsibilities
	<ul style="list-style-type: none"> <li>A Tribal Nation that chooses to request its own Presidential disaster declaration conducts the IDA and coordinates with FEMA to conduct the joint PDA. In this capacity, the Tribal Nation is responsible for identifying the damage, working with FEMA to determine if a joint PDA should be requested, developing a joint PDA plan, coordinating and scheduling site assessments and/or Applicant interviews, identifying who should participate in the joint PDA, coordinating transportation and access to damage areas, and then determining if there is enough damage to request a Presidential disaster declaration. Also, the Tribal Nation uses PDA data to develop data-driven written requests for Presidential disaster declarations.</li> </ul>
State or Territorial Government	<ul style="list-style-type: none"> <li>Manages the PDA planning process by coordinating with local authorities and the respective FEMA Regional office to ensure mutual understanding of expectations;</li> <li>Provides vehicles, transportation, and/or other access to affected areas;</li> <li>Reviews damage identified during the IDA to decide whether to request a joint PDA;</li> <li>Participates in the joint PDA and share IDA documentation with FEMA;</li> <li>Determines whether to request a Presidential disaster declaration; and</li> <li>Develops data-driven written requests for Presidential disaster declarations.</li> </ul>
FEMA Region	<ul style="list-style-type: none"> <li>Coordinates with the state, Tribal Nation, or territory (STT) to ensure that all necessary information is ready and available before the joint PDA is approved;</li> <li>Participates in the joint PDA and makes a data-driven recommendation based on declaration factors to FEMA headquarters (HQ) on whether the STT government should receive a Presidential disaster declaration; and</li> <li>Supports the PDA through the Regional Response Coordination Center (RRCC) Recovery Coordinator until such responsibilities are transitioned to another designee.</li> </ul>
Joint PDA Team	<ul style="list-style-type: none"> <li>Conducts site visits to validate damage identified during the IDA.</li> </ul>

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

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

## Local or Tribal Nations Roles and Responsibilities

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

names; however, the roles and responsibilities described in Table 5 should be considered as local or county damage assessment teams are determined.

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

Local and Tribal Roles	Responsibilities
Local or Tribal Damage Assessment Coordinator	<ul style="list-style-type: none"> <li>Identifies and trains local assessment team members;</li> <li>Coordinates damage assessment activity in the jurisdiction; and</li> <li>Submits information to the county, state, or Tribal Nation, as appropriate.</li> </ul>
Local or Tribal Individual Assistance (IA) Damage Assessment Team Member	<ul style="list-style-type: none"> <li>Collects information related to location, ownership, occupancy, and insurance coverage of impacted residences and categorizing damage according to criteria established by FEMA for IA.</li> </ul>
Local or Tribal Public Assistance Damage Assessment Team Member	<ul style="list-style-type: none"> <li>Collects information and supporting documentation related to the categories of work during the damage assessment.</li> </ul>

## STT Government Roles and Responsibilities

STT government damage assessment staff serve in PDA leadership roles and often lead site assessments with FEMA support. Table 6 describes the roles and responsibilities for STT governments as they relate to the damage assessment process. The STT government is not expected to fill every role included in Table 6 and it may assign staff based on the magnitude of the incident. FEMA may provide technical assistance to fill roles or the STT government may augment its capabilities with support from Voluntary Organizations Active in Disaster (VOAD) or other voluntary agency partners.

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

State, Tribal, or Territorial Roles	Responsibilities
STT Government Damage Assessment Coordinator	<ul style="list-style-type: none"> <li>Serves as the principal state, Tribal Nation, or territorial (STT) representative overseeing damage assessment and validation;</li> <li>Ensures the initial damage assessment (IDA) is appropriately supported;</li> <li>Ensures state, local, tribal, and territorial (SLTT) government staff are prepared to validate local assessment findings;</li> <li>Coordinates with federal representatives during the joint preliminary damage assessment (PDA); and</li> <li>Ensures appropriate support is provided as requests for federal assistance are drafted.</li> </ul>
STT Government IA Damage Assessment Team Lead	<ul style="list-style-type: none"> <li>Serves as the STT government representative responsible for overseeing damage assessment activity related to the Individual Assistance (IA) program;</li> <li>Oversees technical programmatic support provided during local or county assessment efforts;</li> <li>Validates IA-related information submitted by local or county emergency managers; and</li> <li>Serves as the primary STT government programmatic representative during the joint PDA.</li> </ul>

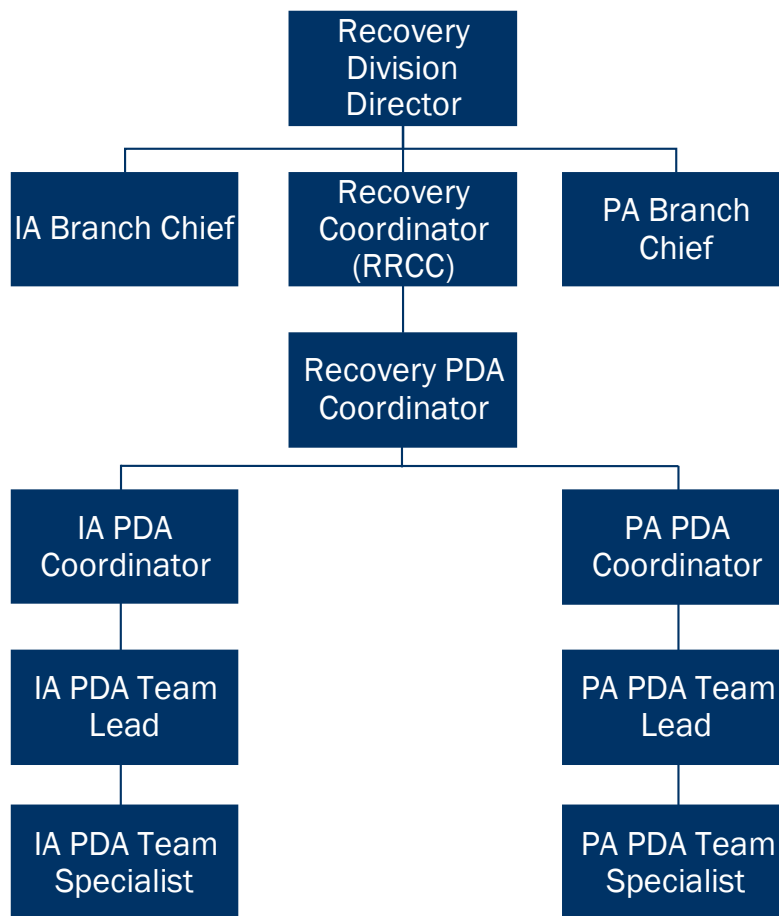
State, Tribal, or Territorial Roles	Responsibilities
STT Government IA Damage Assessment Team Member	<ul style="list-style-type: none"> <li>Provides subject matter expertise or other technical support to impacted jurisdictions during the local damage assessment and STT government validation phases; and</li> <li>Represents the STT government as part of the joint PDA.</li> </ul>
STT Government Voluntary Agency Liaison (VAL)	<ul style="list-style-type: none"> <li>Supports damage assessments;</li> <li>Reports to the STT government IA damage assessment team lead; and</li> <li>Performs the duties of the mass care and emergency assistance specialist, when necessary.</li> </ul>
STT Government Mass Care and Emergency Assistance Specialist	<ul style="list-style-type: none"> <li>Documents activity and evaluates the capacity of Other Federal Agencies (OFA) and non-governmental organizations (NGO) providing mass care and emergency assistance support; and</li> <li>Perform the duties of the VAL, when necessary.</li> </ul>
STT Government PA Damage Assessment Team Lead	<ul style="list-style-type: none"> <li>Oversees damage assessment activity related to the Public Assistance (PA) program;</li> <li>Provides technical programmatic support during local or county assessment efforts;</li> <li>Represents the state or Tribal Nation as part of joint PDA field assessment team;</li> <li>Validates PA-related information submitted by local or county emergency managers; and</li> <li>Provides subject matter expertise or other technical support to impacted jurisdictions during local damage assessment and state or Tribal Nation phases.</li> </ul>
STT Government Geospatial and Data Analysis Lead	<ul style="list-style-type: none"> <li>Analyzes, views, and extracts damage information from geospatial data;</li> <li>Uses Geographic Information System (GIS) to review location-based data collected by field staff, view imagery or virtually sensed data, and develop and run models to predict disaster impact;</li> <li>Uses GIS to conduct geospatial statistical analyses and derive findings from correlating different data types; and</li> <li>Uses GIS to provide a high-level view of damaged structures.</li> </ul>

## FEMA Roles and Responsibilities

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

When an IA joint PDA or a PA joint PDA are requested, the FEMA Regional Recovery Division Director, IA branch chief, or PA branch chief identify an IA PDA coordinator and/or a PA PDA coordinator, and an IA PDA team lead and/or PA PDA team lead. PDA team leads are typically senior program specialists or specialists with considerable experience conducting PDAs. As a best practice while conducting PDAs, the FEMA PDA team lead acts as a senior

observer, serves as a subject-matter expert (SME) on eligibility issues, and collects the information FEMA needs to continue the PDA process. The basic structure of a PDA team is outlined in Figure 6.



**Figure 6. PDA Team Structure**

The region deploys PDA team leads and team members in coordination with the Recovery PDA coordinator. The IA PDA team lead and/or PA PDA team lead, or the IA PDA coordinator and/or PA PDA coordinator uses the Deployment Tracking System (DTS) to assemble, manage, and deploy PDA team members. DTS allows the PDA team lead to track PDA team members assigned a PDA Ancillary Support (AS) title and ensure all team members have completed the minimum training requirements necessary to support a joint PDA. While training requirements vary by region, at a minimum, PDA team members are required to complete training on the PDA process and conducting site inspections and have qualified experience in the IA, PA, or Hazard Mitigation programs.

When the Tribal Nation requests a joint PDA, a FEMA Regional tribal liaison is also required to facilitate culturally appropriate communication with Tribal Nation leaders and members. This includes providing tribe-specific cultural awareness training to PDA team members prior to their deployment in the field environment. See Appendix D: Tribal-Specific Considerations

for more information on the programmatic differences that might be highlighted during a PDA for Tribal Nations.

Table 7 outlines general roles and responsibilities for members who may be part of the FEMA damage assessment team dependent on the situation. Table 9 in Chapter 4 and Table 11 in Chapter 5 outline additional programmatic roles and responsibilities for FEMA staff supporting IA joint PDAs and PA joint PDAs.

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

FEMA Damage Assessment Team Roles	Responsibilities
FEMA Headquarters (HQ) Preliminary Damage Assessment (PDA) Unit	<ul style="list-style-type: none"> <li>• Supports state, local, tribal, and territorial (SLTT) governments and the regions with technology and training needs;</li> <li>• Advises on policy by coordinating with the Individual Assistance (IA) and Public Assistance (PA) branches; and</li> <li>• Supports the regions and SLTT stakeholders with policy and technical assistance.</li> </ul>
FEMA PDA Team Lead	<ul style="list-style-type: none"> <li>• Collects, aggregates, and archives joint PDA data from field team members;</li> <li>• Creates narratives and tables used to document validated damage; and</li> <li>• Oversees PDA team members.</li> </ul>
FEMA PDA Team Member	<ul style="list-style-type: none"> <li>• Facilitates the exchange of information with local officials to ensure damage and impact information is accurately and efficiently collected.</li> </ul>
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> <li>• Provides information related to environmental and historic preservation regulatory and Environmental Justice program requirements;</li> <li>• Identifies potential impacts to natural, historic, and cultural resources;</li> <li>• Prioritizes available resources to protect natural, historic, and cultural resources;</li> <li>• Collects and compiles relevant environmental and historic preservation data and information for inclusion in the PDA narrative;</li> <li>• Facilitates communications with federal and state resource and regulatory agencies to address real-time emergency work with potential to impacts to natural, historic, and cultural resources; and</li> <li>• Provides information related to resilience opportunities in the event of disaster declaration.</li> </ul>
FEMA Mitigation Point of Contact or Specialist	<ul style="list-style-type: none"> <li>• Provides information related to the National Flood Insurance Program (NFIP), such as flood insurance policies;</li> <li>• Identifies communities that are not currently participating in NFIP;</li> <li>• Identifies mitigation opportunities on a site-specific or SLTT-wide basis;</li> <li>• Collects and compiles relevant mitigation data and information for inclusion in the hazard mitigation PDA impact statement; and</li> <li>• Provides information related to PA Hazard Mitigation in the event of disaster declaration.</li> </ul>
FEMA External Affairs Media Relations Specialist	<ul style="list-style-type: none"> <li>• Serves as FEMA's representative to the media for matters related to the joint PDA;</li> <li>• Develops congressional notices for impacted districts where joint PDAs will be conducted prior to the joint PDA; and</li> </ul>

FEMA Damage Assessment Team Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Provides intergovernmental affairs support as a liaison between FEMA programmatic specialists and Tribal Nations via regional tribal affairs advisors.</li> </ul>
FEMA Community Assistance Coordinator or Specialist	<ul style="list-style-type: none"> <li>Provides recovery support through early integration of community impact information into the PDA and collects community impact information from the PDA to inform early event Community Assistance assessments; and</li> <li>Provides opportunities for early integration and coordination with Recovery Support Functions (RSF) or other federal agencies (OFA).</li> </ul>
FEMA Civil Rights Advisors	<ul style="list-style-type: none"> <li>Advises the team on providing reasonable accommodations to disaster survivors with disabilities, including offering damage assessment forms in Braille, large print, or electronic formats; or providing sign language interpreters during inspections;</li> <li>Advises the team on providing language access services during inspections including translating vital documents (e.g., damage assessment forms) if the disaster survivor's primary language is not English;</li> <li>Provides an interpreter to achieve effective communication between the inspector and the disaster survivor whose primary language is not English; and</li> <li>Receives and processes informal complaints from disaster survivors alleging discrimination based on race, color, religion, nationality, sex, age, disability, English proficiency, or economic status;</li> <li>Gathers statistics and data to develop a community analysis by coordinating with the Geographic Information System (GIS) unit of the Planning section or downloading data provided by the U.S. Census Bureau, including the American Community Survey; and</li> <li>Provides input in the planning, design, implementation, monitoring, and evaluation of disaster risk activities to provide better services to survivors by using information from the community analysis.</li> </ul>
U.S. Small Business Administration PDA Coordinator	<ul style="list-style-type: none"> <li>Serves as FEMA's representative by overseeing the coordination of all U.S. Small Business Administration (SBA)-PDA related activity and ultimately for the efficient and accurate assessment of program- related damage, as defined by SBA standards and policies; and</li> <li>Collects, aggregates, and archives PDA data from SB PDA team members and formulating narratives and tables used to document validated damage.</li> </ul>
SBA PDA Team Member	<ul style="list-style-type: none"> <li>Reports on the results of damage and impact validation surveys conducted in the field in accordance with SBA damage assessment guidelines.</li> </ul>
Other Federal Agencies (OFA)	<ul style="list-style-type: none"> <li>Provides information by coordinating with the FEMA PDA coordinator or programmatic team lead to help develop efficient and effective damage and impact information.</li> </ul>

## FEMA Regional Office

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



The RA and RRDD have the delegated authority to appoint anyone they deem fit to the coordinator and team lead roles. The FEMA PDA coordinator is a regional asset that reports to the RRDD. The PDA coordinator oversees recovery program teams conducting IA and PA PDAs in the field. The responsibilities outlined in Table 8 clarify the role of FEMA Regional office staff.

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

FEMA Region Roles	Responsibilities
FEMA Regional Administrator	<ul style="list-style-type: none"> <li>• Has direction, authority, and control over all regional functions and assets, including area offices authorized as a component of the regional office;</li> <li>• Receives requests from the STT government for disaster declarations;</li> <li>• Makes a recommendation based on information provided in the Regional Administrator's Validation and Recommendation (RVAR);</li> <li>• Identifies and requests staffing, financial, and material resource requirements for deployments and for conducting PDAs, where feasible and necessary; and</li> <li>• Supervises the feasibility, scheduling, and time requirements for conducting pre-declaration and PDA activities.</li> </ul>
FEMA Regional Recovery Division Director or Regional Response Division Director	<ul style="list-style-type: none"> <li>• Oversees the deployment of Regional Recovery Division staff required to support STT government requests for joint preliminary damage assessments (PDA);</li> <li>• Ensures necessary programmatic information is available during the development of the RVAR; and</li> <li>• Oversees the components of FEMA's Regional Recovery Division, including programmatic and technical assistance provided within the region in all phases of the damage assessment process.</li> </ul>
FEMA Mitigation Division Director, Deputy Division Director, or Delegated Representative	<ul style="list-style-type: none"> <li>• Manages and directs PDA activities for the Mitigation Division in the region;</li> <li>• Coordinates with regional recovery leadership to ensure joint PDAs are appropriately staffed with Mitigation Division points of contact and specialists; and</li> <li>• Ensures the Mitigation Division provides the appropriate level of programmatic input to the RVAR (e.g., by providing a hazard mitigation PDA narrative report).</li> </ul>
FEMA PDA Coordinator	<ul style="list-style-type: none"> <li>• Serves as a single point of contact for recovery program teams conducting assessments in the field;</li> <li>• Ensures team leads are supported by the regional office;</li> <li>• Assists hazard mitigation and environmental and historic preservation (EHP) leads in planning for team members and scheduling;</li> <li>• Performs programmatic PDA team functions; and</li> <li>• Oversees PDA team leads and any supporting PDA team members.</li> </ul>
IA Regional Branch Chief	<ul style="list-style-type: none"> <li>• Provides direction and oversight of the Individual Assistance (IA) program;</li> <li>• Coordinates with the state, Tribal Nation, or territorial (STT) government program leads, Other Federal Agencies (OFA), and Recovery Support Functions (RSF);</li> <li>• Mobilizes staff and assets;</li> <li>• Provides programmatic input for the Regional Administrator's Validation and Recommendation (RVAR);</li> </ul>

FEMA Region Roles	Responsibilities
	<ul style="list-style-type: none"> <li>• Coordinates with the PDA coordinator to support the IA PDA team lead and other IA PDA specialists conducting the joint PDA in the field; and</li> <li>• Provide subject-matter expertise on IA program eligibility and programs.</li> </ul>
PA Regional Branch Chief	<ul style="list-style-type: none"> <li>• Provides direction and oversight of the Public Assistance (PA) program;</li> <li>• Coordinates with the STT government program leads, OFAs, and RSFs;</li> <li>• Mobilizes staff and assets;</li> <li>• Provides programmatic input for the RVAR;</li> <li>• Coordinates with the PDA coordinator to support the PA PDA team lead and other PA PDA specialists conducting the joint PDA in the field; and</li> <li>• Provide subject-matter expertise on PA program eligibility, programs, and estimates for codes and standards.</li> </ul>
FEMA Regional Tribal Liaison	<ul style="list-style-type: none"> <li>• Provides culturally appropriate communication with Tribal Nation leaders and members; and</li> <li>• Provides tribe-specific cultural awareness training to PDA team members prior to their deployment in the field environment.</li> </ul>

# CHAPTER 3: JOINT PDA METHODOLOGIES

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

## Overview

Conducting joint PDAs requires SLTT governments and the federal government to balance speed and accuracy. The agreed-upon methodology should be flexible to account for differences between the scale and scope of damage and the availability of resources to conduct the joint PDA. Regardless of the methodology, FEMA must validate IDA damage estimates with visual confirmation and supporting documentation.

### Respecting Tribal Privacy

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

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

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

## Self-Reporting

Local, county, or STT emergency managers often employ self-reporting methods to quickly develop initial damage information. They are encouraged to employ self-reporting, as it allows the STT government to easily review damage and the joint PDA team to easily validate damage. Joint PDA teams confirming damage should create annotated maps, if possible; tag damages with Global Positioning System (GPS) coordinates; and take photographs of damage used to assess a home or site's damage level to reduce the time required to validate information.

## Door-to-Door Assessments

Door-to-door assessments are commonly used by IA joint PDA teams following smaller incidents, when damage cannot be otherwise validated, or for validating damage from a PDA under appeal. Joint PDA teams conducting door-to-door assessments should take photographs of damage used to assess a home or site to reduce the time required to validate information. Teams should only employ the door-to-door assessment method if other methods are insufficient. Teams should also only enter dwellings with the permission of the occupant and after safety considerations are evaluated by the team.

## Digital Surveys

Field team members can use digital applications to replace paper street sheets. This includes the IA survey, which is used for single family homes and multi-family residences, and the PA survey, which is used to document estimated costs. IA and PA surveys can be accessed at [FEMA.GOV/PDA](https://www.fema.gov/pda). Collecting PDA data digitally allows for the instant transfer of data to the server when the user has access to a data connection. If no data connection is available, data can still be collected digitally offline and saved to an outbox.

## Validation Tools

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

## Site Assessments

Joint PDAs for PA are typically conducted through in-person site assessments because PA damage assessments require a considerable amount of site-level information. The joint PDA team should take photographs of damage to support restoration work and cost estimates.

### Urban Search and Rescue Rapid Assessments

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

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

The joint PDA team may also use drawings to report the dimensions and damage to support the work and cost estimates. When local governments and Tribal Nations conduct thorough IDAs with photographs and supporting documentation, joint PDA teams may choose to validate damages through desktop validation. Site assessment should still be conducted for sites with extensive damage, prioritizing the most damaged, and for projects with the potential for natural and cultural resource significance and/or impact.

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

## Windshield Surveys

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

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

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

## Virtual Sensing

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

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

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

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

- Weather,
- Flight prohibition,
- Poor data environments,
- Contract acquisition timeline, and
- The size of the impacted area.



## Geographic Information Systems

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

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

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

## Modeling

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

### *HAZUS*

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

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

### *Prioritizing Operations Support Tool*

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

## Desktop Assessments

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

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

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

If the joint PDA team uses the desktop assessment methodology, the process for joint PDAs will be adjusted so that:

1. The STT government works with local staff to collect IDA data.
2. FEMA PDA team members virtually review information submitted through the IDA and determine if the damages meet eligibility and cost requirements for IA or PA.
3. The FEMA PDA team notifies other team members of potential challenges in their area of support.
4. FEMA PDA staff communicate any validation concerns to the PDA coordinator.
5. The PDA coordinator contacts the STT PDA coordinators to resolve the validation issue. If a resolution cannot be reached, an onsite joint PDA may be required.

# CHAPTER 4: INDIVIDUAL ASSISTANCE JOINT PRELIMINARY DAMAGE ASSESSMENTS

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

## Overview

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

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

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

1. Uninsured home and personal property losses,
2. State or territory fiscal capacity and resource availability,
3. The disaster impacted population profile,<sup>7</sup>
4. Impact to community infrastructure,
5. Casualties, and
6. Disaster-related unemployment.

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

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<sup>7</sup> Please refer to 44 CFR 206.48 (b) 3 for more information.

For Tribal Nations requesting their own disaster declarations, FEMA will consider the following factors for IA based on the FEMA's *Tribal Declarations Interim Guidance*:

1. Displaced households and the availability of housing resources;
2. Uninsured home and personal property losses and pre-existing conditions;
3. Casualties, injuries, and missing individuals;
4. Impact to community infrastructure and cultural facilities;
5. Disaster impacted population profile;
6. Tribal Nation capacity and resources to respond to the disaster;
7. Unique conditions that affect Tribal Nations;
8. Disaster-related unemployment;
9. Disaster history within 36 months or recent multiple disasters that impacted the Tribal Nation; and
10. Other relevant information.

#### **Disaster Impacted Population Profile**

The demographics of an affected community are considered following disaster as they may identify additional needs, require a more robust community response to support, or impact a community's ability to recover.

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

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

## **IA Roles and Responsibilities**

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

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

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

## STT Government Roles and Responsibilities

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

## FEMA Roles and Responsibilities

The FEMA PDA coordinator reports to the FEMA RRDD, often through the Regional IA Branch Chief. Programmatic team leads assigned to oversee IA program assessments report to the FEMA PDA coordinator and coordinate with the regional IA branch chief (as needed) to provide IA programmatic support throughout the joint PDA. When the STT government requests an IA joint PDA, the FEMA RDD or IA branch chief identifies an IA PDA team lead. IA PDA team leads are typically senior program specialists or specialists with considerable experience in conducting PDAs.

The roles and responsibilities outlined in Table 9 clarify the responsibilities for FEMA staff as they relate to the IA PDA process. The PDA Team may not include every role listed in Table 9. Roles may be added or removed based on the magnitude of the incident.

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

FEMA Damage Assessment Team Roles	Responsibilities
FEMA PDA Coordinator	<ul style="list-style-type: none"><li>• Serves as a single point of contact for recovery program teams conducting assessments in the field;</li><li>• Ensures team leads are supported by the regional office;</li><li>• Performs programmatic preliminary damage assessment (PDA) team functions; and</li><li>• Serves as a subject matter expert (SME) and addresses complex eligibility questions presented by the FEMA Individual Assistance (IA) PDA teams.</li></ul>
FEMA IA PDA Team Lead	<ul style="list-style-type: none"><li>• Functions as an IA PDA team member if the PDA is localized and roles can be combined;</li><li>• Collects, aggregates, and archives joint PDA data from field team members;</li><li>• Creates narratives and tables used to document validated damage; and</li><li>• Oversees PDA team members.</li></ul>
FEMA IA PDA Team Member	<ul style="list-style-type: none"><li>• Facilitates the exchange of information with local officials to IA damage and impact information is accurately and efficiently collected; and</li><li>• Validates damage to homes in the field.</li></ul>
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"><li>• Ensures that environmental and historic preservation concerns identified during the joint PDA are understood and can be addressed at the appropriate level of government.</li></ul>
FEMA Voluntary Agency Liaison Crew Leader	<ul style="list-style-type: none"><li>• Documents activity and evaluates the capacity of government agencies and non-governmental organizations (NGO) providing mass care/emergency assistance care and support; and</li></ul>

FEMA Damage Assessment Team Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Coordinates with NGOs, including Voluntary Organizations Active in Disaster (VOAD) and/or Community Organizations Active in Disaster (COAD) members to document activity and evaluate capacity of those organizations.</li> </ul>

## FEMA Regional Office

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

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

FEMA Regional Office Role	Responsibilities
FEMA IA Regional Branch Chief	<ul style="list-style-type: none"> <li>Provides direction and oversight of the Individual Assistance (IA) program;</li> <li>Coordinates with the state, Tribal Nation, or territorial (STT) government program leads, Other Federal Agencies (OFA), and Recovery Support Functions (RSF);</li> <li>Mobilizes staff and assets;</li> <li>Provides programmatic input for the Regional Administrator's Validation and Recommendation (RVAR);</li> <li>Coordinates with the PDA coordinator to support the IA PDA team lead and other IA PDA specialists conducting the joint PDA in the field; and</li> <li>Provide subject-matter expertise on IA program eligibility and programs.</li> </ul>
Mass Care and Emergency Assistance Specialist	<ul style="list-style-type: none"> <li>Documents activity and evaluates capacity of government agencies and non-governmental organizations (NGO) providing mass care/emergency assistance care and support; and</li> <li>Coordinates with NGOs, including Voluntary Organizations Active in Disaster (VOAD) and/or Community Organizations Active in Disaster (COAD) members in order to document activity and evaluate capacity of those organizations.</li> </ul>



## Damage Levels

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

- Mapped location information, generally (e.g., jurisdictions impacted) and specifically (e.g., physical addresses or GPS coordinates of damaged dwellings);
- The degree of damage;
- Incident or peril type;
- Insurance for the peril type;
- The home type, such as manufactured homes, conventionally built homes, single-family residence, multi-family residence, group homes, or non-traditional homes;<sup>8</sup>
- Homes owned or rented by disaster survivors (tallied as a total percentage); and
- Primary or secondary residences (tallied as a total percentage).

### Essential Living Spaces

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

FEMA has established four degrees of damage that an impacted home may fall within: affected, minor, major, or destroyed. In many cases, the size and needs of the unfolding disaster will not allow PDA teams to conduct a detailed review of each home.

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

- **Affected:** Non-structural damage to a home that does not make the home unsafe to enter or occupy.
- **Minor:** Repairable, non-structural damage to a home or damage from flood waters when the waterline is below the electrical outlets in an essential living space in a conventionally built home, or when the waterline is in the floor system of a manufactured home.
- **Major:** Structural damage or other significant damage that requires extensive repairs or damage from flood waters when the waterline is at or above the electrical outlets in an essential living space in a conventionally built home, or when the waterline enters the living space of a manufactured home.

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<sup>8</sup> Non-traditional housing includes house boats, travel trailers, recreational vehicles, and tents if they are the Applicant's primary residence. Joint PDA teams use damage descriptions for manufactured homes when evaluating damage to non-traditional housing.

- **Destroyed:** Significant enough damage that the home is deemed a total loss.

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

When part of the home sustains disaster-caused damage, the functionality of that component is also considered. For example, if a portion of the roof is damaged due to the event and the roof is not repairable, the entire component must be replaced. IA assessors will consider that the roof needs to be replaced as part of the damage assessment, increasing the proposed damage level.

The joint PDA team also assesses damage following flooding or fire events differently. The joint PDA team focuses on determining the high-water level during floods, if the home was inundated with smoke, or if the home was destroyed by the fire, rather than assessing component damage directly.

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

- Duration of the flood;
- Contaminants in the water, such as sewage, oil, or chemicals that require special decontamination protocols above standard flood water cleaning procedures;
- Damage to or displacement from the foundation;
- Cosmetic damage, such as paint discoloration, loose siding, missing shingles or siding, or damaged gutters; and
- Damage to mechanical components, such as the furnace, boiler, water heater, or HVAC system.

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

#### **Inaccessible Homes**

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

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

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

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

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

## Manufactured Homes

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

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

### Habitability

On March 22, 2024, FEMA simplified its regulatory definition of habitability to broaden eligibility to include repairs to homes with preexisting conditions that are further damaged by disaster. Repairs to disaster-damaged homes may qualify for FEMA support regardless of pre-existing conditions, so the home is in a safe and sanitary condition. The updated definition eliminates the previous requirements that only provided repair assistance for components to ensure habitability if the components was functional pre-disaster.

**Table 11. Minor Manufactured Homes Damage Levels**

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> <li>The waterline has reached the floor system but has not entered the living space of the unit. There may be damage to bottom board, insulation, ductwork in the floor system, or heating, ventilating, and air conditioning (HVAC).</li> <li>There is no structural damage to the residence, and it has not been displaced from its foundation.</li> </ul>
For non-flood incidents	<ul style="list-style-type: none"> <li>Some of the nonstructural components have sustained damage (e.g., damaged windows, doors, wall coverings, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC).</li> <li>There is no structural damage to the residence, and it has not been displaced from its foundation.</li> </ul>

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

**Table 12. Major Manufactured Homes Damage Levels**

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> <li>Water has covered the floor system and entered the living space of the residence but is below the ceiling.</li> <li>The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.</li> </ul>
For non-flood incidents	<ul style="list-style-type: none"> <li>The majority of nonstructural components (e.g., windows, doors, wall coverings, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC) have sustained significant damage.</li> <li>The roof is substantially damaged.</li> <li>The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.</li> </ul>

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

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

## Conventionally Built Homes and Multi-Family Homes

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

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

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

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> <li>Waterline in the crawl space or an unfinished basement.</li> <li>Damage to an attached structure (e.g., porch, carport, garage, outbuilding, etc.), gutters, screens, landscaping, and retaining walls or downed trees that do not affect access to the residence.</li> <li>Essential living spaces and mechanical components are not damaged or submerged.</li> </ul>
For non-flood incidents	<ul style="list-style-type: none"> <li>The residence has cosmetic damage, such as paint discoloration or loose siding.</li> <li>The residence has minimal missing shingles or siding.</li> <li>Damage to gutters, retaining walls, or downed trees that do not affect access to the residence.</li> </ul>

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

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

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> <li>The waterline is below electrical outlets in the lowest floor with essential living space.</li> <li>Damage or disaster-related contamination to a private well or septic system.</li> </ul>
For non-flood incidents	<ul style="list-style-type: none"> <li>Nonstructural damage to roof components over essential living spaces (e.g., shingles, roof covering, fascia board, soffit, flashing, and skylight).</li> <li>Nonstructural damage to the interior wall components, to include drywall and insulation.</li> <li>Nonstructural damage to exterior components.</li> <li>Multiple small vertical cracks in the foundation.</li> <li>Damage to chimney (i.e., tilting, falling, cracking, or separating from the residence).</li> <li>Damage to mechanical components (e.g., furnace, boiler, water heater, heating, ventilating, and air conditioning [HVAC], etc.).</li> <li>Damage or disaster-related contamination to a private well or septic system.</li> </ul>

When the waterline is below the electrical outlets in an essential living space, damage may be recorded as major, depending on extenuating conditions, including:

- Duration of the flood;
- Contaminants in the water, such as sewage, heating fuel, or other chemicals; or
- The waterline in basement damages mechanical components, such as the furnace, boiler, water heater, or HVAC.

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

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

Incident Type	Damage Description
For flooding incidents	<ul style="list-style-type: none"> <li>Waterline is at or above the electrical outlets in an essential living space.</li> <li>Waterline on the first floor (regardless of depth) if the basement is completely submerged.</li> </ul>
For non-flood incidents	<ul style="list-style-type: none"> <li>Failure or partial failure to structural elements of the roof over essential living spaces to include rafters, ceiling joists, ridge boards, etc.</li> <li>Failure or partial failure to structural elements of the walls, including framing, etc.</li> <li>Failure or partial failure to foundation, to include crumbling, bulging, collapsing, horizontal cracks, and shifting of the residence from its foundation.</li> </ul>

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

- There is complete failure of two or more major structural components (e.g., collapse of foundation, walls, or roof);
- The waterline is at or higher than the ceiling of an above-ground essential living space;
- Only the foundation remains; or
- The residence is in imminent danger (e.g., impending landslide, mudslide, or sinkhole).

## Factors for Evaluating Requests for IA for States and Territories

Following the joint PDA, the STT government may choose to submit an IA disaster declaration request. FEMA evaluates the request based on six declaration factors. These factors allow FEMA to assess the cost of assistance, assess available resources, and assess impacts. FEMA evaluates the information in the disaster request to include, but not limited to, the projected costs of assistance, available resources, and the total impacts of the disaster. For more information on the factors FEMA uses to review tribal Presidential disaster declaration requests, see [Appendix D: Tribal-Specific Considerations](#).

### Assessing Cost of Assistance

The cost of assistance estimate is established by assessing and categorizing the degree of damage of disaster-impacted residences. This calculation uses PDA data to make informed and data driven decisions while projecting the cost of assistance based on the state or Tribal Nation's fiscal capacity and uninsured home and personal property losses. FEMA evaluates PDA data, including the number of damaged homes, the degree of damage, the rate of home ownership, the cause of damage, and insurance coverage. Proof of home ownership is not required until survivors register for IA.

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

### Insurance Coverage

Capturing an accurate picture of the number of insured and uninsured homes is critical to the damage assessment process. Large numbers of damaged uninsured homes applicable to the peril

#### Insurance Coverage Specifics

FEMA only considers insurance coverage which includes the peril(s) listed as a cause of damage identified for the disaster when determining eligibility for assistance.



may suggest a greater need for supplemental federal assistance. Generally, this information is developed from the best available resources, which may be in conjunction with state insurance commissions or through other avenues. FEMA may also use general homeowner insurance percentages as the basis for evaluating insurance coverage in a community. This data improves consistency in determining homeowners' insurance and can be used in the Individuals and Households Program (IHP) cost estimate when making the programmatic recommendation on a declaration request.<sup>9</sup>

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

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

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

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

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<sup>9</sup> For additional information, please refer to Memorandum: Insurance Data for Joint Preliminary Damage Assessments.

## Assessing Available Resources

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

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

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

## Assessing Impacts

There is not a set number of damaged homes that will automatically trigger a Presidential disaster declaration for an STT. Each disaster must be evaluated individually on the impacts that have overwhelmed the capacity and resources of the STT government. During the PDA

process, STT governments should consider all factors that FEMA uses to evaluate a disaster request and write a compelling impact statement to demonstrate how the impacts of the disaster have overwhelmed the capacity and resources of the impacted governments.

### Privately Owned Access Routes

FEMA may provide financial assistance to repair privately owned access routes (i.e., driveways, roads, or bridges) damaged as a result of a Presidential-declared disaster. For additional information on assistance, refer to the IAPPG.

## Documenting Relevant Impacts

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

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

- Disaster-impacted population profile,
- Impacts to community infrastructure,
- Disaster-related deaths and injuries,
- Emergency sheltering information,

- Feeding operations information,
- Information related to distribution of emergency supplies,
- Individual client assistance (client casework) information,
- Information referral services, and
- Unique conditions that affect Tribal Nations.

## Impact Statements

Impact statements help illustrate whether the disaster is beyond the capacity of the impacted jurisdiction and if supplemental federal assistance is required to recover. When FEMA reviews a governor's request for a major disaster declaration authorizing IA, FEMA considers the six declaration factors to measure the severity, magnitude, and impact of the incident. FEMA recommends that a governor or TCE include information specifically addressing the declaration factors in a declaration request. The impact statement narrative should expand on the data documenting the six declaration factors and highlight considerations related to a community's ability to recover from a disaster. This can include a focus on recovery challenges, indicators of a prolonged recovery period, and trauma experienced by the impacted population. In addition to the six declaration factors, impact statements for IA requests should include the following basic components:

- An outline of the incident, including whether it was human-caused or natural, the time of occurrence, and the location;
- Disaster history within the last 24-month period, particularly those occurring within the current fiscal cycle; and
- Numbers or statistics that lend context to the incident.

# CHAPTER 5: PUBLIC ASSISTANCE JOINT PRELIMINARY DAMAGE ASSESSMENTS

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

## Overview

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

FEMA uses PDA information to evaluate the need for assistance under the PA program. Inclusion in the PA PDA is based on the likely eligibility of grant assistance following the disaster declaration. The PDA team does not make eligibility determinations while conducting the PDA but captures damage and costs that likely meet the eligibility criteria outlined in the PAPPG when validating damages and costs claimed during joint PDAs. Refer to the PAPPG for detailed information on PA programs and [www.FEMA.gov/PDA](http://www.FEMA.gov/PDA) for additional resources for conducting a PDA.

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

## PA Roles and Responsibilities

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

### FEMA Roles and Responsibilities

The FEMA PDA coordinator reports to the FEMA RRDD, often through the regional PA branch chief. Programmatic team leads assigned to oversee PA program assessments report to the FEMA PDA coordinator and coordinate with the regional PA branch chief (as needed) to

provide PA programmatic support throughout the joint PDA. When the STT government requests a PA joint PDA, the FEMA RDD or PA branch chief identifies a PA PDA team lead. PA PDA team leads are typically senior program specialists or specialists with considerable experience in conducting PDAs.

Table 16 clarifies the reporting relationships and responsibilities for FEMA staff as they relate to the PA PDA process. The PDA team may not include every role listed in Table 16. Roles may be added or removed based on the magnitude of the incident.

**Table 16. FEMA PA PDA Team Member Roles and Responsibilities**

FEMA Damage Assessment Team Roles	Responsibilities
FEMA PDA Coordinator	<ul style="list-style-type: none"> <li>• Serves as a single point of contact for recovery program teams conducting assessments in the field;</li> <li>• Ensures team leads are supported by the regional office;</li> <li>• Performs programmatic preliminary damage assessment (PDA) team functions;</li> <li>• Assists hazard mitigation and environmental planning and historic preservation (EHP) leads in planning for team members and schedules; and</li> <li>• Serves as a subject matter expert (SME) and addresses complex eligibility questions presented by the FEMA Public Assistance (PA) PDA teams.</li> </ul>
FEMA PA PDA Team Lead	<ul style="list-style-type: none"> <li>• Serves as the programmatic representative responsible for overseeing all PA PDA actions;</li> <li>• Ensures program-related damage throughout the affected area is efficiently and accurately assessed;</li> <li>• Serves as the field-level SME and addresses complex eligibility questions that arise from site assessments;</li> <li>• Functions as a PA PDA team member if the PDA is localized and roles can be combined;</li> <li>• Collects, aggregates, and archives joint PDA data from field team members;</li> <li>• Creates narratives and tables used to document validated damage; and</li> <li>• Oversees PDA team members.</li> </ul>
FEMA PA PDA Team Member	<ul style="list-style-type: none"> <li>• Facilitates the exchange of information with local officials to ensure work, cost, and program requirement information is accurately and efficiently collected;</li> <li>• Validates, quantifies, and documents the cause, location, and details of estimated program costs; and</li> <li>• Validates damage assessments and cost estimates while ensuring programmatic requirements are met in the field.</li> </ul>
FEMA Environmental and Historic Preservation Specialist	<ul style="list-style-type: none"> <li>• Provides information related to environmental and historic preservation regulatory and Environmental Justice program requirements;</li> <li>• Identifies potential impacts to natural, historic, and cultural resources;</li> <li>• Prioritizes available resources to protect natural, historic, and cultural resources;</li> <li>• Collects and compiles relevant environmental and historic preservation data and information for inclusion in the PDA impact statement;</li> </ul>

FEMA Damage Assessment Team Roles	Responsibilities
	<ul style="list-style-type: none"> <li>Facilitates communication with federal and state resource and regulatory agencies to address real-time emergency work with potential impacts to natural, historic, and cultural resources; and</li> <li>Provides information related to resilience opportunities in the event of disaster declaration.</li> </ul>

## FEMA Regional Office

The FEMA Regional office provides oversight and direction to PA program branch chiefs and other staff throughout the joint PDA process. During the assessment process, FEMA Regional office staff make determinations on eligibility for federal disaster assistance based on the IDA information submitted by STT governments. Program specific responsibilities are outlined in Table 17. For additional information on the roles and responsibilities for regional personnel, please refer to Chapter 2.

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

FEMA Regional Office Roles	Responsibilities
FEMA Regional PA Branch Chief	<ul style="list-style-type: none"> <li>Provides direction and oversight of the Public Assistance (PA) program;</li> <li>Coordinates with the state, Tribal Nation, or territorial (STT) government program leads, Other Federal Agencies (OFA), and Recovery Support Functions (RSF);</li> <li>Mobilizes staff and assets;</li> <li>Provides programmatic input for the Regional Administrator's Validation and Recommendation (RVAR);</li> <li>Coordinates with the PDA coordinator to support the PA PDA team lead and other PA PDA specialists conducting the joint PDA in the field; and</li> <li>Provide subject-matter expertise on PA program eligibility and programs</li> </ul>
FEMA Regional Environmental Officer	<ul style="list-style-type: none"> <li>Oversees FEMA's environmental and historic preservation (EHP) regulatory compliance;</li> <li>Integrates technical assistance throughout the damage assessment process;</li> <li>Coordinates with EHP Specialists to identify and document site-specific damage locations that may require detailed EHP review in accordance with federal environmental laws, regulations, and executive orders;</li> <li>Collaborates with OFA and/or STT resource or regulatory agencies to identify potential environmental issues or historic preservation concerns that may impact joint PDA considerations; and</li> <li>Coordinates FEMA Regional PA Branch Chiefs on EHP concerns.</li> </ul>

## Factors for Evaluating Requests for PA

The amount of damage that requires validation by FEMA depends on each individual disaster. SLTT governments are encouraged to validate damage to the fullest extent possible during the IDA and submit damage eligible for PA before the joint PDA. Regional PA leadership reviews the validated PDA information submitted by the SLTT government in



order to make an eligibility determination and recommendation for federal disaster assistance. The region may request additional information or documentation to substantiate damage at any stage of the joint PDA process.

## Estimated Cost of Assistance

STT governments are responsible for identifying and estimating their cost of assistance by assessing the total damage and eligible emergency work. The cost of assistance is then assessed against the population and established per capita indicators at the state and county level. Per capita indicators are updated annually and can be found on FEMA's website. Indicators are not a requirement but are a baseline to measure against. Localized impacts that are so severe but do not meet an indicator may still be considered. Tribal Nations requesting their own Presidential disaster declaration do not need to meet a per capita indicator.

### *Identifying Applicants*

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

1. State and territorial government agencies,
2. Tribal Nations,
3. Local governments, and
4. Certain PNP organizations, as defined in 44 CFR Part 206.221 (e).<sup>10</sup>

#### **Program Eligibility Considerations**

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

- Applicant
- Facility
- Work
- Cost

### *Identifying Damaged Facilities*

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

The PDA provides information that allows FEMA to identify opportunities for hazard mitigation. Section 1206 of the Disaster Recovery Reform Act (DRRA) defines the framework and requirements for consistent and appropriate implementation of the PA program, one of the PA declaration factors. The DRRA provides communities with the resources they need to effectively administer and enforce state and locally adopted building codes and floodplain

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<sup>10</sup> PDAs may be conducted only for certain PNP critical service providers, otherwise known as "critical PNPs," that are eligible for federal disaster assistance. Critical PNPs include certain education, medical, utility, and emergency service providers. Administrative and support buildings essential to the operation of PNP critical service providers are eligible for federal disaster assistance. PNPs that provide non-critical services must first apply for a disaster loan from the SBA for permanent work and must pass an Office of Chief Counsel (OCC) eligibility review before becoming eligible to receive federal disaster assistance.

management ordinances for a period of no longer than 180 days after the date of the major disaster declaration.

### *Documenting Damage*

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

- The result of the disaster,
- The legal responsibility of an Applicant, and
- Within a jurisdiction being assessed (except for sheltering and evacuation activities).

Applicants are encouraged to photograph damage that demonstrates the scale and includes different angles of the damage from varying distances. This may expedite damage assessment validation and help Applicants to document pre-restoration damage should a disaster be declared. For damage assessments, sufficient photographic documentation should be submitted for each sample site, along with an indication of how many other sites that sample represents. Photographs should be included to validate damage at sites where emergency construction is necessary (e.g., construction of an emergency roadway).

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

Applicants should document the dimensions, materials, and the size or capacity of damaged facility elements. This is particularly important for work to be completed because the information gathered is often critical to estimating and validating work and cost required for restoration. Providing annotated maps and/or GPS tagged debris locations of damage in affected areas may also aid in the validation process and should be included, if possible.

### *PDA System Reporting Application*

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

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

### *Documenting Work and Cost*

To organize work-related information, FEMA divides each Applicant's work into logical groupings. These groupings first separate activities into two primary work types: emergency

work and permanent work. These work types are further divided into categories of work (A to G) defined by FEMA. This grouping structure is listed in Table 18. Refer to the [PAPPG](#) for more information on types and categories of work.

**Table 18. Types and Categories of Work**

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

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

Completed work can be summarized and supported, when necessary, with additional documentation. The Applicant must develop estimates for work to be completed. A member of an Applicant's staff that is familiar with the damaged facility and develops estimates for similar work or a qualified professional should develop estimates. Work and cost estimate calculations should be provided for all work to be completed to allow validation of estimates and ensure that it meets program eligibility requirements. FEMA may accept Applicant-submitted cost estimates if a licensed professional engineer or other estimating professional prepares the estimate. When damage to a facility is complex or beyond the ability of an Applicant to estimate, FEMA technical experts may estimate the work and cost.

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

- Labor (Force Account),
- Equipment (Force Account),
- Leased equipment,
- Supplies,
- Contract service,
- Mutual aid agreements,
- Repairs versus replacement, and
- Landslides and slope stabilization.

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

### *Costs Not Considered*

Costs that are not eligible for PA funding will not be considered during the PA PDA. There are also costs that may be considered for PA but are not available at the time of the PDA.

Examples include, but are not limited to:

- Costs ineligible for PA,
  - Loss of useful service life of facilities,
  - Loss of revenue,
  - Tax assessments,
  - Increased operating expenses (with limited exceptions for specific emergency health and safety tasks),
  - General surveys to assess damage, and
  - Cost of restoring facilities that were not in active use at the time of the disaster.
- Costs potentially eligible for PA but not considered for a PDA,
  - Project management or administration costs, such as legal and financing costs;
  - Engineering and architectural costs,
  - Costs to comply with codes and standards,
  - Costs of mitigation measures, and
  - Other pre/post construction expenses.

### **Active Insurance Coverage**

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

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

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

### *Obtain and Maintain Requirements*

Applicants that receive PA funding for permanent work to replace, repair, reconstruct, or construct a facility must obtain and maintain insurance to protect the facility against future loss. This requirement applies to insurable facilities or property, including those funded as an Alternate, Improved, or Alternative Procedures Project. If an Applicant's facility has a requirement to obtain and maintain insurance as a result of having previously received PA and the Applicant has failed to do so, that facility is ineligible for assistance and FEMA will not consider the damage to that facility in the damage assessments.<sup>11</sup>

### **Hazard Mitigation Projects**

FEMA considers the extent to which hazard mitigation projects undertaken by the SLTT government contributed to the reduction of disaster damage for the disaster under consideration. If the STT government can demonstrate in its disaster request that a statewide building code or other measure is likely to have reduced the cost of repairing damage, this will be considered in the evaluation of the request. The STT government should provide information related to hazard mitigation projects to the FEMA PDA team lead during the joint PDA so that it can be included in the governor's or TCE's request for federal assistance.

### **Localized Impacts**

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

### **Recent Multiple Disasters**

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

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<sup>11</sup> For additional information on insurance requirements, please refer to FP 206-086-1 Public Assistance Policy on Insurance and FEMA Policy 104-22-0003: Partial Implementation of the Federal Flood Risk Management Standard (FFRMS) for Public Assistance (Interim).

## Per Capita Impact Calculations

When calculating the cost of assistance for determining whether the state meets or exceeds the statewide per capita indicator (PCI), FEMA will include the estimated costs from counties that do not meet the countywide PCI if:

1. At least 75 percent of statewide PCI is met with counties that meet the countywide PCI (designated counties), and
2. The undesignated counties and the remaining portion of the statewide PCI is met by counties that meet at least 50 percent of the countywide indicator.<sup>12</sup>

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

## Other Federal Agency Programs

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

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

## Impact Statements

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

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<sup>12</sup> Counties that meet the countywide indicator may be recommended for designation, while counties that are at 50 percent will remain undesignated until they reach 100 percent of the countywide indicator.

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

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

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



# APPENDIX A: ACRONYMS

ALE	Additional Living Expenses
AS	Ancillary Support
BIA	Bureau of Indian Affairs
CAP	Civil Air Patrol
CBRN	Chemical, Biological, Radiological, Nuclear
CERT	Community Emergency Response Team
CFR	Code of Federal Regulations
COAD	Community Organizations Active in Disaster
DHS	Department of Homeland Security
DRRA	Disaster Recovery Reform Act
DTS	Deployment Tracking System
EHP	Environmental and Historic Preservation
EPA	Environmental Protection Agency
FCO	Federal Coordinating Officer
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
GIS	Geographic Information System
GPS	Global Positioning System
HAZUS	Hazards United States
HQ	Headquarters
HSPD	Homeland Security Presidential Directive
HVAC	Heating, Ventilating, and Air Conditioning
IA	Individual Assistance
IAPPG	Individual Assistance Program and Policy Guide
IDA	Initial Damage Assessment
IHP	Individuals and Households Program
JFO	Joint Field Office
LiDAR	Light Detection and Ranging

NIMS	National Incident Management System
NFIP	National Flood Insurance Program
NGO	Non-Governmental Organization
NHC	National Hurricane Center
NRCS	Natural Resource Conservation Service
NRF	National Response Framework
OCC	Office of Chief Counsel
OCONUS	Outside Continental United States
OEA	Office of External Affairs
OFA	Other Federal Agency
ONA	Other Needs Assistance
ORR	Office of Response and Recovery
PA	Public Assistance
PAPPG	Public Assistance Program and Policy Guide
PDA	Preliminary Damage Assessment
PII	Personally Identifiable Information
PNP	Private Nonprofit
POST	Prioritizing Operations Support Tool
PPD	Presidential Policy Directive
RA	Regional Administrator
RRCC	Regional Response Coordination Center
RVAR	Regional Administrator's Validation and Recommendation
SAR	Synthetic Aperture Radar
SBA	U.S. Small Business Administration
SHPO	State Historic Preservation Office
STT	State, Tribal, and Territorial
SFHA	Special Flood Hazard Area
SLTT	State, Local, Tribal, and Territorial
SME	Subject Matter Expert
SOP	Standard Operating Procedure

TCE	Tribal Chief Executive
THPO	Tribal Historic Preservation Office
USACE	United States Army Corps of Engineers
US&R	Urban Search and Rescue
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
USNG	U.S. National Grid
VAL	Voluntary Agency Liaison
VOAD	Voluntary Organizations Active in Disaster
WDR	Wind-Driven Rain

## APPENDIX B: GLOSSARY

**Applicant.** Individuals, families, states, Tribal Nations, local governments, or private nonprofit organizations who apply for assistance as a result of a declaration of a major disaster or emergency.

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

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

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

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

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

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

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

**Facility.** Any publicly or privately owned building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature. Land used for agricultural purposes is not a facility.

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

**Flood Damage.** Damage caused by flooding.

**Hazard Mitigation.** Any cost-effective measure which will reduce the potential for damage to a facility from a disaster event.

**Hazard Mitigation Grant Program.** A grant program that ensures SLTT governments have the financial opportunity to plan for and implement hazard mitigation measures that reduce the risk of loss of life and property from future natural disasters during the reconstruction process following a disaster. Hazard Mitigation Grant Program funding is available when authorized through a major disaster declaration.

**Individual Assistance.** Supplementary federal assistance provided under the Stafford Act to individuals and families adversely affected by a major disaster or an emergency. Such assistance may be provided directly by the federal government or through state, Tribal Nation, or local governments or disaster relief organizations.

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

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

**Major Disaster Declaration.** Any natural catastrophe (including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, or drought), or, regardless of cause, any fire, flood, or explosion, in any part of the United States, which in the determination of the President causes damage of sufficient severity and magnitude to warrant major disaster assistance under this Act to supplement the efforts and available resources of States, local governments, and disaster relief organizations in alleviating the damage, loss, hardship, or suffering caused thereby. A major disaster declaration provides a wide range of federal assistance programs for individuals and public infrastructure, including funds for both emergency and permanent work.

**Manufactured Home.** A structure, transportable in one or more sections, which is built on a permanent chassis and is designed for use with or without a permanent foundation when attached to the required utilities. The term manufactured home does not include a recreational vehicle. Generally, manufactured homes must meet the same requirements as stick built or conventional housing. Because they are usually residential buildings, they must be elevated so that the lowest floor is above the Base Flood Elevation (BFE). Manufactured homes must be elevated and anchored to a permanent foundation to resist flotation, collapse, or lateral movement.

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

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

**Public Assistance.** Supplementary federal assistance provided under the Stafford Act to state, Tribal Nation, and local governments or certain private, nonprofit organizations other than assistance for the direct benefit of individuals and families.

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

**Recipient.** A state or Tribal Nation that receives a federal award directly from FEMA. A recipient may also be a pass-through entity. The recipient does not include subrecipients. The recipient is the entire legal entity even if only a particular component of the entity is designated in the grant award document. Generally, the state is the recipient. However, a Tribal Nation may choose to be a recipient or may act as a subrecipient under the state. A Tribal Nation acting as recipient will assume the responsibilities of a "State," for the purposes of administering the grant.

**Subrecipient.** The government or other legal entity to which a subaward is awarded and which is accountable to the recipient for the use of the funds provided. Subrecipients can be a state agency, local government, private nonprofit organization, or Tribal Nation. Tribal Nations acting as a subrecipient are accountable to the state recipient.

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

# APPENDIX C: AUTHORITIES AND FOUNDATIONAL DOCUMENTS

## Authorities

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

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

## Regulations

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

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

## Policies

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

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



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

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

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

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

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

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

## **Doctrine**

### **National Response Framework (NRF), October 2019**

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

### **National Disaster Recovery Framework (NDRF), December 2024**

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

## **National Mitigation Framework, June 2016**

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

## **FEMA Publication 1, November 2019**

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

## **National Incident Management System (NIMS), October 2017**

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

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

## **FEMA Disaster Operations Keystone, 2022**

The Disaster Operations Keystone (DOK) is the foundation for all FEMA disaster operations doctrine and provides a strategic overview of FEMA's approach to disaster operations. This strategic overview outlines, at a high level, the key functions and underlying concepts that make up FEMA's disaster operations and explains their important role in helping survivors and impacted communities. The DOK explains the "what" and the "why," establishing the basis for operational and tactical-level doctrine to build upon and explains the "how," "when," and "who." Documenting FEMA's approach helps to synchronize and align disaster operations, ensuring every member of the FEMA incident workforce works with a common purpose and in support of FEMA's overall mission. This document also helps the incident

workforce understand how they contribute to FEMA's mission of helping people before, during, and after disasters.

## **Public Assistance Program Delivery Guide**

The Public Assistance Program Delivery Guide describes how FEMA implements the PA Program and establishes the framework for Applicant-driven, state-led, and federally supported delivery of PA. The PA Program Delivery Guide defines objectives and indicators of successful program delivery, along with Applicant, Recipient, and FEMA roles and responsibilities.

## **Individual Assistance Declarations Factors Final Guidance, June 2019**

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

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

# APPENDIX D: TRIBAL-SPECIFIC CONSIDERATIONS

The Sandy Recovery Improvement Act amended the Stafford Act in 2013 to give federally recognized Tribal Nations the authority to request an emergency or major disaster declaration.<sup>13</sup> As a result of this authority, Tribal Nations have several options for seeking disaster assistance from the Federal Emergency Management Agency (FEMA) through its Individual Assistance (IA) and Public Assistance (PA) programs. These options provide Tribal Nations with important opportunities for flexibility and the ability to exercise their right to self-determination.

## FEMA Assistance Options for Federally Recognized Tribal Nations

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

- Recipient with its own declaration.
- Subrecipient under a state declaration.
- Recipient under a state declaration.
- Combination of the previous three options without duplicating program services.

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

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

## Purpose of This Appendix

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

## Using This Appendix

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

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<sup>13</sup> Stafford Act § 102(8), 42 U.S.C. § 5122; 44 C.F.R. § 206.2(a)(16), State-recognized Tribes are considered local governments.

## What Are Preliminary Damage Assessments?

A PDA is the term for an assessment conducted to identify damage after a disaster. The state, Tribal Nation, or territorial (STT) government conducts the initial damage assessments (IDA). The STT government may then conduct the joint preliminary damage assessments (joint PDA) with FEMA. The IDA and/or joint PDA can be conducted as either an IA or PA program damage assessment. Depending on the disaster, FEMA may be required to conduct damage assessments for both IA and PA.

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

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

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

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

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

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

- They must be requested by the Tribal Chief Executive (TCE) or the Tribal Authorized Representative;
- They are submitted to the appropriate FEMA Regional Administrator (RA); and
- They are critical for informing a Presidential disaster declaration request.

Tribal Nations submit requests for technical assistance, joint PDAs, and Presidential disaster declarations to the FEMA Regional office in which the Tribal Nation seat is located, but assistance can be provided from across FEMA Regions depending on the requirements to meet Tribal Nation resource requests. Tribal Nations that want to be considered part of a state's joint PDA or Presidential disaster declaration request should work with the RA, Regional Recovery Division Director, and tribal liaison in the region in which the requesting state is located. FEMA must then ensure that states have collaborated with and included Tribal Nations in their request for PDAs.

## Individual Assistance

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

When Tribal Nations receive an IA disaster declaration, they must define and identify their unique "tribal community members." The tribal community members, as defined by the Tribal Nation, are the individuals the Tribal Nation wants to be eligible to receive IA. Tribal Nations can facilitate the IA PDA process by identifying their tribal community members either before or during the joint PDA. A tribal community member is typically enrolled members of the Tribal Nation and other individuals that are the responsibility of the Tribal Nation (e.g., descendants, widows/widowers, adopted

### Data Sovereignty and Data Sharing

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

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

children, and others). Tribal declarations are also not limited to tribal lands or reservations, and they may include any tribal community member that lives within an area impacted by the disaster. This is not limited to tribal lands, reservation, township, county, or state boundaries. Tribal Nations are encouraged to identify these individuals before an event occurs. Tribal declarations can also be expanded to include tribal-owned facilities, tribal interest lands, tribal lands, or reservations.

## Public Assistance

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

**Table 19. Types and Categories of Work**

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

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

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



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

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

## PDA Process

For most incidents affecting Tribal Nations, the decision to request FEMA assistance should not be made until PDAs have taken place in coordination and collaboration with FEMA and the state(s). If the Tribal Nation decides to pursue a joint PDA, the Tribal Nation should request a joint PDA through the FEMA Region, with the region facilitating further communication, and to initiate the damage assessment and provide additional information on its options for the assessment. The information gathered during PDAs is an essential element of a Tribal Nation's Presidential disaster declaration request.

### Expedited Declarations

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

## Tribal Nation Completes IDA

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

Tribal Nations may require technical assistance to complete the IDA. Requirements for completing the IDA may be adjusted on a case-by-case basis based on the Tribal Nation's

capabilities and incident-specific conditions. Tribal Nations are not always expected to complete all IDA requirements or participate in an IDA with the state. However, Tribal Nations are encouraged to conduct as detailed an IDA as possible to facilitate both the PDA and declaration process.

## PDA Operations in a Tribal Setting

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

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

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

- Limiting the size of teams to essential personnel while assessing damage on Tribal Nation land;
- Adjusting its strategy for tribal-specific conditions, as they may differ from a state, county, or non-tribal lands;
- Requiring that leadership has met with Tribal Nation leadership to establish any ground-rules and/or procedures to be followed prior to deploying any field staff; and
- Ensuring all field staff have received a Tribal Nation specific cultural brief prior to deployment to the field.

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

## Individual Assistance IDA

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

**Table 21. IA Damage Assessment Methods**

Method	Description
Self-Reporting	Self-reporting is the process by which individual members of the tribal community report disaster damages to the Tribal Nation or Tribal Nation emergency manager. This process contains several steps: <ul style="list-style-type: none"><li>• Tribal Nation creates or identifies an appropriate method for the public to report damage (e.g., phone line and email address).</li><li>• Tribal Nation sends out a public message requesting tribal community members with disaster-related impacts to report those impacts.</li><li>• Tribal Nation collects this information in damage assessment reports.</li><li>• Tribal Nation sends out teams to validate information in each report.</li></ul>
Windshield Survey	Windshield surveys are an efficient way to assess damage to individual homes from a vehicle and can be used to validate reports from the field. Assessment teams record observed damage while driving through impacted areas, periodically stopping to conduct interviews with tribal community members to validate damage, insurance coverage, or ownership status.
Door-to-Door Assessment	Door-to-door assessments happen when Tribal Nation officials physically go to each home, meet and interview owners or renters, and document actual damage. This process is more time intensive, but it improves accuracy, which is valuable for steps later in the process.
Geospatial Analysis	Geospatial analysis uses existing and post-event satellite or flyover imagery and data to assess damage and is typically used to expedite damage assessments when more traditional methods will be too time intensive. The Geographic Information System (GIS) can be used throughout the process to describe damage, perform analysis, and illustrate impact.
Modeling	Modeling (or predictive modeling) can be used in a variety of ways to estimate probable damage. These products are produced by a number of universities, private sector firms, and federal agencies.

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

impact and underscore how the unique resources of the Federal Government are necessary to support tribal community members.

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

Tribal Nation-specific factors<sup>14</sup> that FEMA uses to determine disaster impacts and eligibility for IA include the following:

- Displaced households and the availability of housing resources;
- Uninsured home and personal property losses and pre-existing conditions;
- Casualties, injuries, and missing individuals;
- Impact to community infrastructure and cultural facilities;
- Disaster Impacted Population Profile, including:<sup>15</sup>
  - Individuals with acute medical needs;
  - Individuals who only speak their Indigenous language or have limited English proficiency; and
  - Individuals receiving unemployment and federal supplemental assistance;
- Tribal Nation capacity and resources to respond to the disaster;
- Unique conditions that affect Tribal Nations;
- Disaster-related unemployment;
- Disaster history within 36 months or recent multiple disasters that impacted the Tribal Nation; and
- Other relevant information.

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

- Cause of damage;
- Concentration of damage;
- Homeownership rate of impacted homes:

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<sup>14</sup> Refer to the *Tribal Declarations Interim Guidance* for additional information on these factors.

<sup>15</sup> FEMA considers the demographics of the whole community including, but not limited to, percentage of elders of the tribal community aged 65 and older, percentage of tribal community members aged 18 and younger, people with disabilities, and other people who have access and functional needs, such as the percentage of tribal community members who have limited English proficiency or are non-English speaking, percentage of tribal community members with a low income, including those on Supplemental Nutrition Assistance Program and Supplemental Security Income, and individuals with acute medical needs, as they may have a greater need for support during disaster recovery.

- Because damage to Tribal Nation homes could fall under IA or PA depending on the owner and who has legal responsibility for the dwelling, Tribal Nations should include a Tribal Nation housing authority representative in the IDA process to accurately capture home ownership;
- Number of homes with insurance;
- Number of homes destroyed and number with major, minor, and affected damage amounts;
- Inaccessible areas;
- Special flood hazard areas if mapped;
- Other relevant information such as income levels, poverty levels, or trauma.

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

- Title, deed, or official record;
- Mortgage statement;
- Real property insurance bill; or
- Written self-declarative statement if all other documentation is unavailable, such as a representative designated by tribal leadership validating ownership and occupancy.

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

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

Knowing how ownership verification works during the PDA process will help inform which program will be responsible for which damage. Tribal housing authority representatives are important resources that can provide insight into which home titles are held by individuals and which home titles are held by the Tribal Nation. Table 22 contains information on identifying ownership and legal responsibility for Tribal Nation housing. While renters may be eligible for some types of financial Housing Assistance, Table 22 can be used as a quick reference for determining eligibility based on home ownership. Refer to the IAPPG and PAPPG for additional information on eligibility for IA and PA, respectively.

**Table 22. Tribal Housing and Eligibility for FEMA Assistance**

Arrangement/ Ownership	Responsibilities	Individual Assistance Eligibility	Public Assistance Eligibility
Individual owns house, but not the land.	The land may be owned by the Tribal Nation or held in trust by the Bureau of Indian Affairs (BIA) and either the land cannot be deeded or it cannot be a traditional deed of trust.	House and personal property.	Land (if owned by the Tribal Nation).
Tribal housing authority owns the house or has otherwise assumed responsibility for maintenance and repair.	A Tribal Nation housing authority is responsible for maintenance and repair of the homes they build until individuals make the final payment and receive full conveyance.	Personal property only.	Authority that owns building may be eligible (e.g., housing department).
BIA owns the house.	BIA funds housing on reservations and repairs, and maintenance of the housing is the responsibility of BIA.	Personal property only.	Land (if owned by the Tribal Nation).
Individual is a conventional homeowner.	Conventional fee simple homeowner paid outright or with a mortgage for the homeowner's home.	House and personal property.	N/A.
Individual inherited home.	Home was inherited, but the title may be lost. Without a title, the owner needs to provide a statement declaring ownership and explain why proof of ownership is lost.	House and personal property.	Land (if owned by the Tribal Nation).
Individual rents on Tribal Nation land.	Renter pays a fee or lives rent-free in dwelling.	Personal property only.	Land (if owned by the Tribal Nation).
Fractionated ownership.	Fifty-one percent of landowners must agree to a new land use agreement. In some cases, there are thousands of landowners because of generations of inheritance.	Depends on the lease agreement.	Land (if owned by the Tribal Nation).

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

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

Damage Type	Conventionally Built Homes	Manufactured Homes
Affected	Residences with minimal cosmetic damage (e.g., essential living spaces and	Residences with minimal cosmetic damage (e.g., waterline below the floor system, or damaged skirting).

Damage Type	Conventionally Built Homes	Manufactured Homes
	mechanical components are not damaged or submerged).	
Minor	Residences with non-structural damage (e.g., waterline below the electrical outlets in an essential living space).	Residences with non-structural damage (e.g., waterline has reached the floor system but has not entered the living space).
Major	Residences sustaining structural damage requiring extensive repairs (e.g., waterline at or above electrical outlets in an essential living space).	Residences sustaining structural damage requiring extensive repairs (e.g., waterline in the living space of the residence but is below the ceiling).
Destroyed	Residences are a total loss, or damage is to such an extent that repair is not feasible (e.g., failure of two or more structural components, waterline at or higher than the ceiling of an above-ground essential living space).	The residence is a total loss (e.g., waterline is at or above ceiling; frame is bent or twisted).

Many types of traditional tribal dwellings, such as adobes, pueblos, teepees, chickees, hogans, or longhouses, may be eligible for IA (or PA if the dwelling is Tribally owned) under FEMA's definition of non-traditional housing. Non-traditional housing may be more prevalent in tribal communities. Non-traditional homes may require repair or construction based on established customs or require that the repairs be conducted by individuals trained by the Tribal Nation in traditional methods of repair and construction. Additionally, while many types of non-traditional housing such as tents or teepees may not typically be eligible for Housing Assistance, residents of non-traditional housing may be eligible for Rental Assistance or Other Needs Assistance. FEMA will consider Tribal dwellings on a case-by-case basis. The standard use of the Individuals and Households Program IA Cost Calculator may not be applicable to tribal dwellings and FEMA Regional staff should consult with the FEMA HQ PDA Unit or IA leadership at the regional or HQ levels for more guidance on the proper application of costs for these dwellings.

## Public Assistance IDA

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

While IDA teams are not expected to know whether damage will ultimately be eligible for the PA program, teams can utilize the basic building blocks of eligibility to better understand



what to look for when documenting damage and work. The four basic components of PA eligibility are Applicant, facility, work, and cost:

- Applicant must be a Tribal Nation entity<sup>16</sup> or certain types of eligible private nonprofit (PNP) organizations that operate facilities that provide critical services and are organized or doing business under tribal law.<sup>17</sup>
- Facility must be a publicly or privately owned building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature. Land used for agricultural purposes is not a facility.
- Work must be required as a result of the declared incident and the legal responsibility of the Tribal Nation.
- Cost must be adequately documented, authorized, necessary, and reasonable. (Eligible costs include labor, equipment, materials, and contract work).

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

**Table 24. PA Methodologies**

Method	Description
Site Assessments to View Actual Damage	<ul style="list-style-type: none"> <li>• Tribal damage assessment teams can work with the Tribal Nation emergency manager and other Tribal Nation authorities and agencies to identify damage areas and determine the legally responsible organization or agency. Emergency responder logs can also be a good source of identifying damage sites. This could include a myriad of Tribal Nation entities, to include Tribal Nation public safety (fire, police, emergency management) and other Tribal Nation departments with responsibility at the community, district, and Tribal Nation level. Regions should work with Tribal Nations pre-disaster to incorporate procedures and processes in the tribal emergency operations plan to ensure documentation and activity logs are emphasized.</li> <li>• Damage assessment teams will conduct in-person visits with their Tribal Nation and Other Federal Agency (OFA) counterparts to damaged areas to collect data and photographs, prioritizing the most significant damage first, as defined or identified by tribal authorities.</li> </ul>
Interviews of Applicants	<ul style="list-style-type: none"> <li>• Damage assessment teams interview representatives from organizations or agencies that have experienced impacts because of the disaster. Sometimes interviews will result in in-person site assessments where teams evaluate damage; other times, the interview is the assessment (i.e., work was already completed).</li> <li>• Damage assessment teams should encourage the interviewees to bring as much documentation of the event and damage as possible, to include photographs (if applicable), insurance coverage, contracts, estimates, and force labor account records. This should include, where possible, information which describes or demonstrates the pre-disaster condition.</li> </ul>

<sup>16</sup> Facilities owned and operated by the Tribal Nations, including casinos, hotels, and other for profit businesses may also be eligible for PA.

<sup>17</sup> For additional information on eligibility, please refer to the PAPPG.

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

Factors that FEMA will ultimately use to determine disaster impacts and a Tribal Nation's eligibility for PA include the following:<sup>18</sup>

- Achieved minimum damage amount,
- Types of damage and amount damaged,
- Tribal Nation community lifelines,
- Economic impact of the incident,
- Tribally-owned housing or maintained housing,
- Tribal Nation resources,
- Demographics,
- Disaster history within 36 months or recent multiple disasters that impacted the Tribal Nation,
- Insurance,
- Unique conditions that affect Tribal Nations, and
- Other relevant information.

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

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

Before a Tribal Nation officially requests a joint PDA from FEMA, it may choose to collaborate with the state to help both entities understand what impacts each has sustained from the disaster. The Tribal Nation can determine whether it will be advantageous to coordinate

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<sup>18</sup> Refer to the *Tribal Declarations Interim Guidance* for additional information on these factors.

instead of filing separately as they might mutually benefit in some way by conducting joint PDAs together or even collaborating on a Presidential disaster declaration request.

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

While collaboration between the Tribal Nation, state, and FEMA is important for the PDA process, the relationship between the Tribal Nation, state, and local communities may not be conducive to the level of cooperation described above. Tribal Nations have the right to sovereignty and self-determination; however, cooperation can be mutually advantageous and assist FEMA in its role in supporting the PDA and declaration request process. Collaboration is always encouraged when feasible and in the best interests of the impacted communities. Tribal Nations can also request technical assistance when performing an IDA if they have limited experience or resources available.

## Tribal Nation Requests Joint PDA with FEMA

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

If the damage is of such severity and magnitude that resources needed to recover are expected to exceed the Tribal Nation's capabilities, the TCE may request a joint PDA from the appropriate FEMA RA. These requests are written and informed by IDA data. Tribal Nations have 60 days from the end of the incident period to either request a

### Joint PDAs and Working with the State(s)

States requesting joint PDAs should offer all Tribal Nations in the impacted area the option to participate. A Tribal Nation may choose to participate in the state's joint PDA or may request to do its own PDA with FEMA. Participation in the state PDA does not preclude the Tribal Nation from requesting its own major disaster declaration. FEMA must validate a Tribal Nation's damage, regardless of whether it participated in the state's PDA, in order to process the declaration request. If the Tribal Nation opts to request its own declaration, FEMA will not include the Tribal Nation's damage in the state's PDA.

declaration or submit a request for an extension. The *Tribal Declarations Interim Guidance* has instructions on how to request a Presidential disaster declaration.

## Tribal Nation Develops PDA Plan of Action

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

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

Program	Plan of Action Elements
Public Assistance	<ul style="list-style-type: none"> <li>• Suggested organization and composition of the joint PDA teams (e.g., tribal team leads, tribal historic preservation officer, tribal roads subject matter expert, other federal agencies having specific trust and/or fiduciary responsibilities, state/local government officials, housing officials, and tribal guides designated by the Tribal Nation with intimate knowledge of the areas being assessed if appropriate, etc.).</li> <li>• A list of damaged facilities and infrastructure and their corresponding estimates. This may include commercial entities or facilities that are the responsibility of the Tribal Nation to maintain and operate.</li> <li>• A list of disaster-related emergency work (e.g., emergency protective measures or debris removal).</li> <li>• A methodology of validating damage to facilities and infrastructure and validating disaster-related work expenses (e.g., site assessments and interviews).</li> <li>• A schedule for visiting damage sites and for conducting interviews with potential Public Assistance (PA) Applicants, prioritizing the largest most costly projects first.</li> <li>• Coordination with the regional tribal liaison.</li> </ul>
Individual Assistance	<ul style="list-style-type: none"> <li>• Suggested organization and composition of the joint PDA teams (e.g., tribal team leads, tribal historic preservation officer, tribal housing authority official, state/local government officials if appropriate, etc.).</li> <li>• A list of damaged homes and their corresponding degrees of damage (i.e., destroyed, major, minor, or affected).</li> <li>• A list of homes that are inaccessible.</li> <li>• A methodology for validating the degree of damage of disaster-impacted homes.</li> <li>• A schedule for visiting and assessing damaged homes or neighborhoods, prioritizing the most heavily impacted areas and homes first. Impacts may be prioritized in non-traditional ways, such as through input from tribal elders or culturally significant communities.</li> <li>• Coordination with the regional tribal liaison.</li> </ul>

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

## FEMA-Tribal Nation Joint PDA

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

Teams comprised of the appropriate Tribal Nation and federal staff (and potentially state and local staff if they have been included) execute joint PDAs in accordance with the Tribal Nation's PDA plan of action. PDA field teams should comprise at least one representative of the Tribal Nation and one representative of FEMA. Other Tribal Nation representatives, agencies, and NGOs may also be asked to participate, as needed. During the joint PDA, the Tribal Nation and FEMA representatives are responsible for validating damages recorded during the IDA through visual confirmation and compiling site visit summaries and damage estimates. The PDA team will conduct a briefing to synthesize all PDA summaries and reach concurrence on damage estimates.

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

**Table 26. Joint PDA Chronology Example**

Step	Individual Assistance Elements	Public Assistance Elements
Pre-Arrival Scheduling	Before FEMA staff arrive, the tribal preliminary damage assessment (PDA) coordinator will establish a schedule for the joint PDA by first prioritizing the most heavily impacted areas and sites, by understanding priorities, but scheduling will ultimately be established by the Tribal Nation.	
	When conducting door-to-door assessments, the Tribal Nation's Emergency Management office and the regional tribal liaison should set up appointments, when possible, with homeowners so that FEMA staff can assess each home individually and meet with tribal community members with a tribal representative always present.	The tribal PDA coordinator will set up appointments with representatives of organizations or agencies that have experienced disaster impacts to discuss damage. Those appointments can be individual interviews, group interviews (multiple representatives at once), or meetings on site with the damaged facility. Tribal council members or other senior tribal officials who want to participate in these events should be accommodated, despite the potential for delays.
FEMA Arrival	FEMA PDA team members will arrive at a central location near the disaster-impacted area, and the FEMA PDA coordinator will contact the tribal PDA coordinator. The FEMA PDA coordinator will assign FEMA team members to individual joint PDA teams as designated in the Tribal Nation's PDA plan of action. The tribal liaison or tribal advisor coordinates PDA team assignments with the Tribal Nation emergency manager.	

Step	Individual Assistance Elements	Public Assistance Elements
Pre-Assessment Meeting	Typically, in the morning before the first assessments, FEMA and the Tribal Nation will meet in person at a central location or all together on a conference call. These meetings should be conducted in person whenever possible. In this forum, Tribal Nation officials can provide an overview of the damage they have validated, review the tribal PDA plan of action, ask questions of FEMA, and ensure each team knows its roles, responsibilities, schedules, and geographic areas.	
Cultural Awareness Training	FEMA Regional tribal liaisons may have already provided a brief training to FEMA staff on cultural awareness when working with Tribal Nations as sovereign nations. When necessary, tribal representatives can supplement that training for FEMA staff with additional information that is specific to the unique history and culture of the Tribal Nation. (For example, are there lands or facilities that are off limits to FEMA staff because of the cultural, spiritual nature of the area?)	
Assessments	Whether door-to-door assessments or windshield surveys, IA PDAs often require a lot of driving from one location, neighborhood, or township to the next.	For each site assessment, interview, or group interview, the tribal team lead will introduce and facilitate the discussion with the Applicant and the FEMA team lead will provide a brief overview of the FEMA PA program and the types of documents FEMA needs to validate damage and work. While at damage sites, joint PDA team members will take photographs with the permission of the Tribal Nation to record damages and supplement with drawings and detailed descriptions when photographing is either not possible or is culturally inappropriate.
Coordination	Throughout the process, the tribal and FEMA PDA coordinators maintain communication and openly and transparently discuss damage estimates and eligibility considerations. Both the tribal and FEMA leadership representatives work together closely to agree on estimate amounts, and both continue to be a resource to their respective team members in the field on all questions of legal responsibility, authority, or FEMA program eligibility.	
Conclusion	Most assessments take multiple days. Damage should be assessed and validated to the fullest extent possible. The PDA team will conduct a briefing to synthesize all PDA summaries and reach concurrence on damage estimates. FEMA will provide the Tribal Nations or Tribal Chief Executive (TCE) with a final summary of its findings to assist the Tribal Nation's decision about whether to request a disaster declaration.	

## Request for Presidential Disaster Declaration

The TCE should make the request to the President through the appropriate FEMA RA. When a request for declaration is received, the FEMA RA reviews the request and validates the information gathered during the joint PDA. The FEMA RA submits their recommendation in the regional administrator's validation and recommendation (RVAR) to the FEMA Administrator at FEMA HQ. Tribal Nations have 60 days from the end of the incident period to request a Presidential disaster declaration or to request an extension. The *Tribal Declarations Interim Guidance* has instructions on how to request a Presidential disaster declaration.

If a Tribal Nation decides that it will not request a Presidential disaster declaration, information gathered during the joint PDA may be used to request assistance from other federal agencies (e.g., U.S. Small Business Administration [SBA]) or to request assistance through state government recovery programs. FEMA Regions will provide technical assistance to Tribal Nations upon request to explore and coordinate other means to meet Tribal Nation needs even when a Presidential disaster declaration is not made.

### Evaluate Other Options

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

These include being a Recipient or subrecipient under a state declaration (if applicable), reaching out to other federal agencies that may have legal responsibility over certain damaged infrastructure, or reaching out to various non-governmental organizations that specialize in emergency response and recovery.

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

## Individual Assistance When Requesting Public Assistance

When a Tribal Nation requests PA, FEMA will also recommend that IA be approved as well when:

- The Tribal Nation requests IA;
- The President approves PA; and
- Tribally-owned (PA eligible) housing and individually-owned (IHP eligible) housing are both impacted at a major or destroyed damage level as determined by the Joint PDA.

When a Tribal Nation seeks IA through this method, the Tribal Nation submits one declaration request. When the criteria is met by the Tribal Nation, FEMA will simultaneously recommend to the President that both PA and IA be approved for the declaration request.



When a Tribal Nation does not meet the conditions but still would like to be considered for IA (e.g., PA was not approved) the Tribal Nation can still request IA. Additionally, a Tribal Nation may still apply for IA without also applying for PA. The Tribal Nation will be responsible for the 25 percent non-federal share of ONA provided to any eligible tribal community member for the declaration.

## PDA Partners

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

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

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

Partner	Support
Indian Health Service	<ul style="list-style-type: none"> <li>Provides funding for health care centers or clinics damaged during a disaster on Tribal Nation land.</li> </ul>
Environmental Protection Agency	<ul style="list-style-type: none"> <li>Oversees the recovery of the Tribal Nation waste management system through the Tribal Waste Management Program.</li> </ul>
National Park Service	<ul style="list-style-type: none"> <li>Provides federal assistance to assess damage to culturally significant sites/property, such as pow wow grounds, museums, campgrounds, and culturally significant agriculture or livestock.</li> </ul>

## Overarching Considerations

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

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

### Tribal Nations as a Pass-through Entity

Recipients are non-federal entities that receive an award from a federal agency (e.g., Tribal Nations). Some recipients are considered “pass-through entities” if they pass the federal award to a subrecipient. Tribal Nations cannot be pass-through entities for non-tribal subrecipients. When a Tribal Nation receives a direct declaration, the only entities that can be subrecipients to the Tribal Nation are tribal organizations (e.g., tribal housing authority) or private nonprofit organizations organized or doing business under tribal law. Tribal recipients cannot pass FEMA assistance to state and local governments for work completed by the state or local government that is the legal responsibility of the state or local government. If the Tribal Nation can demonstrate sole or joint legal responsibility either through a mutual aid agreement or through maintenance records, FEMA can reimburse the Tribal Nation for the work the Tribal Nation has completed. In some cases, through a mutual aid agreement, Tribal Nations can be reimbursed for work completed on behalf of a Tribal Nation by a state or local entity as part a mutual aid agreement or memoranda of understanding. The Tribal Nation would then reimburse the local or state government per the terms of the agreement. Additional information about mutual aid agreements can be found in the *Tribal Declarations Interim Guidance*. Disaster-related damage or work that is the legal responsibility of a non-

tribal local government or non-governmental organization should not be included in a Tribal Nation's PDA; this type of work would be the responsibility of the state or local entity.

## **Tribal Insurance Coverage**

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

## **Cultural Sites and Items**

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

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

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

FEMA typically uses a standardized list of personal property items to determine which disaster-damaged items may be eligible for IA ONA. For individual cultural items to be eligible for IA reimbursement, the Tribal Nation must submit an ONA Administrative Option Selection Form and add its cultural, spiritual, or traditional line items to the standard

personal property line-item list. Tribal recipients submit their form to FEMA annually by November 30, regardless of the option selected; however, certain FEMA Regions do not require forms to be submitted annually for review and approval based on the number of Tribal Nations in their particular region. Following a major disaster declaration in which IA is an approved program, all updates to the form must be completed by the recipient within 72 hours of authorization of IA. All items added to the list are subject to the 25 percent non-federal cost share. This should be addressed with the Tribal Nation during the PDA process and again immediately upon notification of the declaration to ensure the appropriate ONA items of cultural significance are included. Items that the Tribal Nation intends to submit as eligible in the post-declaration ONA Administrative Option Selection Form should be included in the PDA estimates.

## Restoration of Traditional Tribal Residential and Ceremonial Structures

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

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

## Cultural Considerations

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

- The regional tribal liaison should provide tribe-specific cultural awareness training to the PDA team;
- PDA teams should engage tribal leadership at the appropriate level;
- PDA team lead should brief tribal leadership on the PDA process and ask for any feedback that can be incorporated into “just-in-time” training for the PDA team;

- PDA teams should include an Environmental and Historic Preservation (EHP) representative (Historic Preservation Specialist) to coordinate activities with the Tribal Historic Preservation Officer (THPO) per regional EHP direction;
- PDA team should work with the Tribal Nation to identify tribal community members who are familiar with the legal ownership status of disaster damaged infrastructure and households and can participate in PDAs;
- PDA teams should consider whether to wear FEMA-branded clothing or use vehicles with Federal Government license plates;
- When possible, teams should ride together in one car to reduce the footprint of the joint PDA and to have time alone as a team to discuss;
- PDA teams should dress in a culturally appropriate manner; and
- PDA teams should understand that Tribal Nations have limited resources and may require additional technical assistance and coordination, which may increase PDA timelines.

# APPENDIX E: TECHNOLOGY

Various technologies can be used to improve the timeliness, accuracy, transparency, and comprehensiveness of damage assessments. State, local, tribal, and territorial (SLTT) governments are not required to use the technologies in this appendix. However, SLTT government partners are encouraged to explore and leverage any technologies they may have access to.

## Mobile Surveys

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

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

## Virtual Validation

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

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

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

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

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

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

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

## Geospatial Damage Assessment Tool

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

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

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



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

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

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

## Drones

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

## Artificial Intelligence

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

# APPENDIX F: PDA FORMS

This appendix includes templates that the state, local, tribal, or territorial government can use to conduct the initial damage assessment or support the joint preliminary damage assessment.

## PDA Narrative Report

PDA NARRATIVE REPORT					
City	County	State	Date	Page	Local Government Official/Contact No.
1. Event type (i.e., flood, wind-driven rain, and tornado) and description of damage trends observed (i.e., water contamination).					
2. Identify issues related to sewer backup (i.e., insurance, damage to sewer lines, and normal sewer backup).					
3. Identify areas with utilities out; include projected date of restoration.					
4. Identify areas of concentrated damage.					
5. Identify remote areas.			6. Identify major inaccessible areas and reasons (i.e., mudslide, landslide, and roads out).		
7. Describe types of structures surveyed (i.e., brick, wood frame, foundation, basements, etc.).					
8. Describe prevalence of damage to manufactured homes or mobile home parks.					
9. Number of businesses impacted.			10. Names of major employers impacted (i.e., description and number of employees).		

11. Other factors that impact tax base (i.e., vacation and tourism properties damaged, permanent exodus of population from disaster area, loss of use of commercial areas, and loss of production base).	12. Describe agricultural impact, if applicable (i.e., loss of crops and livestock).
13. Are there currently shelters open?	
14. Estimated number of displaced households and where they are staying.	
15. Are there sufficient housing and rental resources to meet the needs of the displaced? If no, where are the nearest available resources?	
16. Describe local and VOAD activities and agency resources available.	
17. Is there a significant need for counseling services?	
18. Describe impact on special populations (i.e., access and functional needs, people with language barriers, and seniors and children).	
19. List Tribal Nations impacted.	
20. List storm-related fatalities and injuries (provide total numbers and names, if possible).	
21. All other factors affecting the area not previously listed (i.e., evacuations, manufactured homes moved, schools as shelters, secondary homes, and concern of local contact).	

## IA Street Sheet Example

[illegible]

# PA Site Sheet Example

FEDERAL EMERGENCY MANAGEMENT AGENCY PRELIMINARY DAMAGE ASSESSMENT SITE ESTIMATE				DATE
PART I — APPLICANT INFORMATION				
COUNTY	NAME OF APPLICANT	NAME OF LOCAL CONTACT	PHONE NO.	
PART II — SITE INFORMATION				
KEY FOR DAMAGE CATEGORY <i>(Use appropriate letters in the "category" blocks below)</i>				
<div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> a. DEBRIS REMOVAL  b. PROTECTIVE MEASURES  c. ROADS AND BRIDGES </div> <div style="width: 30%;"> d. WATER CONTROL FACILITIES  e. PUBLIC BUILDINGS  f. PUBLIC UTILITIES </div> <div style="width: 30%;"> g. OTHER <i>(Parks, Recreational Facilities, etc.)</i> </div> </div>				
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
SITE NO.	CATE-GORY	LOCATION <i>(Use map location, address, etc.)</i>		
DESCRIPTION OF DAMAGE				
IMPACT:			% COMPLETE	COST ESTIMATE
NAME OF INSPECTOR		AGENCY		OFFICE PHONE NO.
				HOME PHONE NO.

FEMA Form 90-81, MAR 95

## APPENDIX G: HOME INSURANCE MATRIX

This appendix includes Table 28, provides generalized home insurance that the state, local, tribal, or territorial government can use to conduct the initial damage assessment or support the joint preliminary damage assessment.

Table 28. IA Housing Insurance Matrix

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

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



# APPENDIX H: INDIVIDUAL ASSISTANCE DAMAGE MATRICES

This appendix includes damage assessment matrices for manufactured and conventionally built homes. State, local, tribal, or territorial governments can use Table 29 and Table 30 to conduct the initial damage assessment or support the joint preliminary damage assessment.

## Manufactured Homes

Table 29. Damage Assessment Matrix for Manufactured Homes

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Affected	The residence has cosmetic damage only.	Below Floor System	<ul style="list-style-type: none"> <li>Cosmetic damage only (e.g., skirting, is impacted).</li> <li>Damage to retaining walls or downed trees that do not affect access to the residence.</li> <li>Damage to an attached or adjacent structure (e.g., porch, carport, garage, outbuilding, etc.), gutters, screens, landscaping, and retaining walls or downed trees that do not affect access to the residence.</li> </ul>	<ul style="list-style-type: none"> <li>Cosmetic damage only (e.g., skirting is impacted).</li> <li>Damage to gutters, retaining walls, or downed trees that do not affect access to the residence.</li> </ul>
Minor	The residence is damaged and requires minimal repairs.	In Floor System Only	<ul style="list-style-type: none"> <li>When the waterline has reached the floor system but has not entered the living space of the residence.</li> <li>Bottom board insulation or ductwork affected.</li> <li>Heating, ventilating, and air conditioning (HVAC) is impacted.</li> <li>There is no structural damage to the residence, and it has not been displaced from its foundation.</li> </ul>	<ul style="list-style-type: none"> <li>There is no structural damage to the residence, and it has not been displaced from its foundation.</li> <li>Some of the nonstructural components have sustained damage (e.g., windows, doors, wall coverings, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC).</li> </ul>

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Major	The residence has sustained significant damage and requires extensive repairs.	Lower than Ceiling in an Essential Living Space	<ul style="list-style-type: none"> <li>Water has covered the floor system and entered the living space of the residence but is below the ceiling.</li> <li>The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.</li> </ul>	<ul style="list-style-type: none"> <li>The majority of nonstructural components (e.g., windows, doors, wall coverings, bottom board insulation, ductwork, utility hookups [e.g., water, electricity, gas, telephone/internet, and septic], and HVAC) have sustained significant damage.</li> <li>The roof is substantially damaged.</li> <li>The residence has been displaced from its foundation, block, or piers, and other structural components have been damaged.</li> </ul>
Destroyed	The residence is a total loss.	At or Above Ceiling	<ul style="list-style-type: none"> <li>The waterline is at or above the ceiling.</li> <li>Residence's frame is bent, twisted, or otherwise compromised.</li> </ul>	<ul style="list-style-type: none"> <li>The residence's frame is bent, twisted, or otherwise compromised.</li> <li>The majority of the structural framing of the roof or walls has been compromised, exposing the interior.</li> </ul>
Inaccessible	Damage to residence cannot be visually verified.	N/A	<ul style="list-style-type: none"> <li>Floodwater or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.</li> </ul>	<ul style="list-style-type: none"> <li>Debris or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.</li> </ul>

## Conventionally Built Homes

Table 30. Damage Assessment Matrix for Conventionally Built Homes

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Affected	The residence has minimal cosmetic damage to the exterior and/or	In Unfinished Basement	<ul style="list-style-type: none"> <li>Waterline in the crawlspace or an unfinished basement.</li> </ul>	<ul style="list-style-type: none"> <li>Cosmetic damage, such as paint discoloration or loose siding.</li> <li>Minimal missing shingles or siding.</li> </ul>

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
	interior.		<ul style="list-style-type: none"> <li>Damage to an attached structure (e.g., porch, carport, garage, outbuilding, etc.), gutters, screens, landscaping, and retaining walls or downed trees that do not affect access to the residence.</li> <li>Essential living spaces and mechanical components are not damaged or submerged.</li> </ul>	<ul style="list-style-type: none"> <li>Damage to gutters, retaining walls, or downed trees that do not affect access to the residence.</li> </ul>
Minor	The residence has sustained a wide range of damage that does not affect structural integrity.	Below Electrical Outlets	<ul style="list-style-type: none"> <li>Waterline below electrical outlets in an essential living space.</li> <li>Damage or disaster-related contamination to a private well or septic system.</li> <li>When waterline is below the electrical outlets, damage may be recorded as Major, depending on extenuating conditions:</li> <li>Duration of the flood.</li> <li>Contaminants in the water (e.g., sewage, heating fuel, other chemicals, etc.).</li> <li>Waterline in basement with damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>Nonstructural damage to roof components over essential living spaces (e.g., shingles, roof covering, fascia board, soffit, flashing, and skylight).</li> <li>Nonstructural damage to the interior wall components, to include drywall and insulation.</li> <li>Nonstructural damage to exterior components.</li> <li>Multiple small vertical cracks in the foundation.</li> <li>Damage to chimney (i.e., tilting, falling, cracking, or separating from the residence).</li> <li>Damage to mechanical components (e.g., furnace, boiler, water heater, HVAC, etc.).</li> <li>Damage or disaster-related contamination to a private well or septic system.</li> </ul>

Degree of Damage	Definition	Flood Damage		Damage Other Than Flood (e.g., Wind-Driven Rain and Earthquake)
		Water Level	Examples	Examples
Major	The residence has sustained significant structural damage and requires extensive repairs.	At or Above Electrical Outlets, or Below Electrical Outlets with Extenuating Conditions	<ul style="list-style-type: none"> <li>Waterline at or above the electrical outlets in an essential living space.</li> <li>Waterline on the first floor (regardless of depth) if the basement is completely submerged.</li> </ul>	<ul style="list-style-type: none"> <li>Failure or partial failure to structural elements of the roof over essential living spaces to include rafters, ceiling joists, ridge boards, etc.</li> <li>Failure or partial failure to structural elements of the walls, including framing, etc.</li> <li>Failure or partial failure to foundation, to include crumbling, bulging, collapsing, horizontal cracks, and shifting of the residence from its foundation.</li> </ul>
Destroyed	The residence is a total loss: (e.g., damaged to such an extent that repair is not feasible, requires demolition, and/or confirmed to be in imminent danger).	At or Above Ceiling in an essential living space	<ul style="list-style-type: none"> <li>Waterline is at or higher than the ceiling of an above-ground essential living space.</li> </ul>	<ul style="list-style-type: none"> <li>Only foundation remains.</li> <li>Complete failure of two or more major structural components (e.g., collapse of basement walls, foundation, walls, or roof).</li> <li>The residence is in imminent danger (e.g., impending landslide, mudslide, or sinkhole).</li> </ul>
Inaccessible	Damage to residence cannot be visually verified.	N/A	<ul style="list-style-type: none"> <li>Floodwater or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.</li> </ul>	<ul style="list-style-type: none"> <li>Debris or compromised infrastructure (i.e., roads blocked, bridge out, etc.) is blocking access to the residence.</li> </ul>

# APPENDIX I: PUBLIC ASSISTANCE DOCUMENTATION CHECKLIST

To the extent possible, joint PDA teams should collect the information listed in Table 31 for each PA work category. However, the checklist is not all-encompassing and other documentation may or may not be requested during the PDA process. Documentation requirements may differ for each incident based on the incident type, incident scale, the time available to conduct the PDA, and the accessibility of damaged sites.

Table 31. Public Assistance Supporting Documentation Checklist

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

# APPENDIX J: PUBLIC ASSISTANCE WORK ELIGIBILITY MATRIX

This appendix includes Table 32, the PA work eligibility matrix that the state, local, tribal, or territorial government can use to conduct the initial damage assessment or support the joint preliminary damage assessment.

**Table 32. Public Assistance Work Eligibility Matrix**

Eligibility Factor	Category A: Debris Removal	Category B: Emergency Protective Measures	Category C: Roads and Bridges	Category D: Water Control Facilities	Category E: Buildings and Equipment	Category F: Utilities	Category G: Parks, Recreational, Other Facilities
Work	<p>Debris types include the following:</p> <ul style="list-style-type: none"> <li>• Vegetative</li> <li>• Construction and demolition</li> <li>• Hazardous waste</li> <li>• Household hazardous waste</li> <li>• White goods (household appliances)</li> <li>• Electronic waste</li> <li>• Soil, mud, and sand</li> <li>• Vehicles and vessels</li> <li>• Putrescent waste</li> <li>• Infectious waste</li> <li>• Chemical, biological, radiological, and nuclear (CBRN) contaminated</li> </ul>	<p>Emergency protective measures include the following:</p> <ul style="list-style-type: none"> <li>• Pre-positioning resources</li> <li>• Expenses related to operating a facility or providing a service</li> <li>• Emergency public transportation and communication</li> <li>• Flood fighting</li> <li>• Emergency operations centers</li> <li>• Emergency access</li> <li>• Supplies and commodities</li> <li>• Meals</li> <li>• Medical care</li> <li>• Evacuation and sheltering</li> <li>• Infectious disease events</li> <li>• Mosquito abatement</li> <li>• Mold remediation</li> <li>• Animal carcasses</li> </ul>	<p>Road components include the following:</p> <ul style="list-style-type: none"> <li>• Surfaces</li> <li>• Bases</li> <li>• Shoulders</li> <li>• Ditches</li> <li>• Drainage structures</li> <li>• Low water crossings</li> <li>• Associated facilities</li> </ul> <p>Bridge components include the following:</p> <ul style="list-style-type: none"> <li>• Decking</li> <li>• Guardrails</li> <li>• Girders</li> <li>• Pavement</li> <li>• Abutments</li> <li>• Piers</li> <li>• Slope protection</li> </ul>	<p>Water control facilities include the following:</p> <ul style="list-style-type: none"> <li>• Dams and reservoirs</li> <li>• Levees and floodwalls</li> <li>• Lined and unlined engineered drainage channels</li> <li>• Canals</li> <li>• Aqueducts</li> <li>• Sediment and debris basin</li> <li>• Storm water retention and detention basins</li> <li>• Coastal shoreline protective devices</li> <li>• Irrigation facilities</li> </ul>	<p>Buildings include all structural and non-structural components, including mechanical, electrical, and plumbing systems; contents and equipment within the building; and furnishings. Equipment includes vehicles and construction equipment.</p>	<p>Utilities include the following:</p> <ul style="list-style-type: none"> <li>• Water storage facilities, treatment plants, and delivery systems</li> <li>• Power generation, transmission, and distribution facilities</li> <li>• Natural gas transmission and distribution plants</li> <li>• Sewage collection systems and treatment plants</li> <li>• Communication systems</li> </ul>	<p>Publicly owned facilities include the following:</p> <ul style="list-style-type: none"> <li>• Mass transit facilities</li> <li>• Beaches</li> <li>• Parks</li> <li>• Playground equipment</li> <li>• Swimming pools</li> <li>• Bath houses</li> <li>• Tennis courts</li> <li>• Boat docks</li> <li>• Piers</li> <li>• Picnic tables</li> <li>• Golf courses</li> <li>• Ballfields</li> <li>• Fish hatcheries</li> <li>• Ports and harbors</li> <li>• Other facilities that do not fit in Categories C to F</li> </ul>

		<ul style="list-style-type: none"> <li>• Residential electrical meters safety inspections</li> <li>• Demolition of private structures</li> <li>• Temporary relocation of essential services</li> <li>• Snow-related activities</li> <li>• Emergency berms on beaches</li> <li>• Temporary emergency repair or stabilization</li> <li>• Temporary slope stabilization</li> </ul>	<ul style="list-style-type: none"> <li>• Approaches</li> <li>• Associated facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Pumping facilities</li> <li>• Navigational waterways and shipping channels</li> </ul>			
Applicant	Applicants are individuals, families, states Tribal Nations, local governments, or private nonprofit organizations who apply for assistance as a result of a declaration of a major disaster or emergency A PNP is potentially eligible only if it is 501(c), (d), or (e) tax exempt and owns or operates a facility that provides a “critical service” (defined as education, utility, emergency, or medical) or a non-critical, essential social service that is provided to the general public. Refer to the Public Assistance Program and Policy Guide (PAPPG) for additional details.						
Facility	A facility is any publicly or privately owned building, works, system, or equipment, built or manufactured, or an improved and maintained natural feature. Land used for agricultural purposes is not a facility. To be eligible, the facility must be owned by or the legal responsibility of a state, local, tribal, or territorial (SLTT) government or owned by or the legal responsibility of a PNP organization that provides educational, utility, emergency, medical, or custodial care and other social-type essential services. Mixed-use facilities are only eligible if more than 50 percent of the physical space is dedicated to eligible work. Inactive facilities or facilities under a specific authority of a federal agency (except public housing) are not eligible.						
Cost	<p>Costs must be directly tied to the performance of eligible work; adequately documented; reduced by all applicable credits (e.g., insurance proceeds and salvage values); authorized and not prohibited under applicable laws and regulations; consistent with the Applicant’s internal policies, regulations, and procedures; and necessary and reasonable. Costs are considered reasonable when they are as follows:</p> <ul style="list-style-type: none"> <li>• Recognized as ordinary and necessary;</li> <li>• Comparable to current market price based on historical documentation, average cost in the area, or published unit costs from national databases;</li> <li>• Above current market price for valid reasons, (e.g., shortage of equipment, materials, supplies, labor, or contractors);</li> <li>• Within the context of exigent circumstances;</li> <li>• Part of ethical business practices; and</li> <li>• Aligned with all procurement requirements.</li> </ul>						



# APPENDIX K: PUBLIC ASSISTANCE WORK ASSESSMENT MATRICES

To the extent possible, joint PDA teams should collect the information listed in Table 33, 34, and 35 for PA work assessment matrices for Categories A, B, and C-G. However, the work assessment matrices are not all-encompassing and other documentation may or may not be requested during the PDA process. Documentation requirements may differ for each incident based on the incident type, incident scale, the time available to conduct the PDA, and the accessibility of damaged sites.

**Table 33. Public Assistance Work Assessment Matrix (Category A: Debris Removal)**

Information	Description of Information Needed		✓	Supporting Documentation/Validation
Location of Debris	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location for roads, rights-of-way, private property, waterways, parks, etc.		<input type="checkbox"/>	Annotated maps.
Location of Debris Operations Facilities	USNG location for staging, reduction sites, disposal sites, pickup locations, etc.			
Work Completed	Percent of debris removal completed at time of assessment.		<input type="checkbox"/>	Brief statement of percentage of work completed at time of assessment.
Debris Type (classification) and Quantity per Type	Provide total quantity of debris to be removed (including debris already moved) by type of debris:		<input type="checkbox"/>	Photographs (to show work completed, work to be completed, and locations where estimates were developed).
	<ul style="list-style-type: none"><li>• Vegetative</li><li>• Construction and demolition</li><li>• Hazardous waste</li><li>• Household hazardous waste</li><li>• White goods (household appliances)</li><li>• Electronic waste</li></ul>	<ul style="list-style-type: none"><li>• Soil, mud, and sand</li><li>• Vehicles and vessels</li><li>• Putrescent waste</li><li>• Infectious waste</li><li>• Chemical, biological, radiological, and nuclear (CBRN) contaminated</li></ul>	<input type="checkbox"/>	Debris quantity calculation sheets.
Type of Work	Is the work, force account, contract, or a combination of both?		<input type="checkbox"/>	Brief statement about whether work is force account, contract, or a combination.
Force Account Labor Costs	Provide regular time and overtime hours and rates for all force account labor.		<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).
			<input type="checkbox"/>	Labor contracts/agreements to verify rates.

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

**Table 34. Public Assistance Work Assessment Matrix (Category B: Emergency Protective Measures)**

Information	Description of Information	✓	Supporting Documentation/Validation
Location(s)	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location.	<input type="checkbox"/>	Notated maps.
Type of Emergency Protective Measures	Details of the emergency protective measures required.	<input type="checkbox"/>	Description of the emergency protective measures required.
Type of Work	Force account, contract, mutual aid, or combination.	<input type="checkbox"/>	N/A
Force Account Labor Costs	Regular time and overtime hours and rates.	<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).
		<input type="checkbox"/>	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	<input type="checkbox"/>	Equipment cost summary.

Information	Description of Information	✓	Supporting Documentation/Validation
Force Account Supply Costs	List supplies used and cost.	<input type="checkbox"/>	Supply cost summary.
Material Costs	List of materials and cost per unit.	<input type="checkbox"/>	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.
Contract Costs	Actual or estimates.	<input type="checkbox"/>	Contracts, bids, invoices (optional for small projects, required for large projects), historic costs for similar work, estimates by professionals familiar with the facility, or commercial estimating source.
Unique Requirements	Narrative describing unique requirements impacting cost.	<input type="checkbox"/>	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	<input type="checkbox"/>	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	<input type="checkbox"/>	Narrative describing EHP considerations such as impacts to historical buildings/structures, involvement of hazardous materials, and the proximity to natural and cultural resources like water, wetlands, floodplains, endangered species, and cemeteries.

**Table 35. Public Assistance Work Assessment Matrix (Categories C to G)**

Information	Description of Information	✓	Supporting Documentation/Validation
Location(s)	Address and/or Global Positioning System (GPS)/United States National Grid (USNG) location.	<input type="checkbox"/>	Notated maps.
Facility Type (structure and materials)	Structure: Road, bridge, road element, building, works, system (e.g., water distribution system), or equipment. Materials: Damaged materials of the facility.	<input type="checkbox"/>	Photographs.
Repair or Replacement	Justification for repair or replacement.	<input type="checkbox"/>	
Damage Dimensions	Size, length, capacity, etc., of damage.	<input type="checkbox"/>	
Damaged Elements/Equipment/Building Contents	Individual elements of the facility that have been damaged.	<input type="checkbox"/>	
		<input type="checkbox"/>	Recent safety inspection or maintenance records that show pre- disaster condition (optional for small projects, required for large projects).

Information	Description of Information	✓	Supporting Documentation/Validation
		<input type="checkbox"/>	Codes and standards can be considered on an exceptional, case-by-case basis when they dramatically increase cost.
Type of Work	Force account, contract, or combination.	<input type="checkbox"/>	Brief statement about whether work is force account, contract, or a combination.
Force Account Labor Costs	Regular time and overtime hours and rates.	<input type="checkbox"/>	Labor cost summary (separate out regular time and overtime).
		<input type="checkbox"/>	Labor contracts/agreements to verify rates.
Force Account Equipment Costs	Time and rates used.	<input type="checkbox"/>	Equipment cost summary.
Force Account Supply Costs	List supplies used and cost.	<input type="checkbox"/>	Supply cost summary.
Material Costs	List of materials and cost per unit.	<input type="checkbox"/>	Material invoices, historic costs for similar work, estimates by professionals familiar with facility, or commercial estimating source.
Contract Costs	Actual or estimates.	<input type="checkbox"/>	Contracts, bids; invoices (optional for small projects, required for large projects), historic costs for similar work, estimates by professionals familiar with the facility, or commercial estimating source.
Unique Requirements	Narrative describing unique requirements impacting cost.	<input type="checkbox"/>	Relevant documentation validating unique requirements.
Impact on Community Functions	Narrative describing impact on normal community functions.	<input type="checkbox"/>	Relevant documentation validating impact on community functions.
Environmental and Historic Preservation (EHP) Considerations	Narrative describing EHP considerations.	<input type="checkbox"/>	Relevant documentation validation EHP considerations.