

**Disaster Operations**

**Standard Operating Procedure**

**November 2023**

**Version 2**

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**Internal Use Only**

**Purpose**

This Standard Operating Procedure (SOP) provides detailed guidance to OHC staff and other relevant HUD stakeholders regarding the support of HUD participating housing counseling agencies, HUD certified housing counselors and Office of Housing Counseling (OHC) staff regarding OHC and program participant engagement in HUD’s disaster assistance and recovery activities.

**Questions**

Any questions regarding this SOP may be directed to Virginia Holman, Housing Program Technical Specialist, Office of Outreach and Capacity Building, Office of Housing Counseling.

**Approval**

David Berenbaum, Deputy Assistant Secretary, Office of Housing Counseling November 27, 2023

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# Chapter 1: Introduction

## Purpose

The Office of Housing Counseling (OHC) developed the following SOP to assist OHC management and staff with policy and procedures in the following situations:

* When HUD participating Housing Counseling Agencies (HCA) are in a geographic area that may be impacted by a disaster (local, regional, state, or national).
* When OHC receives a request from Office of Disaster Management (ODM) for HCAs to provide counseling at a Federal Emergency Management Agency (FEMA) Disaster Recovery Center (DRC)
* When HUD receives a request from a state or local government for coordination with OHC for the participation of HCAs in their disaster recovery efforts.

**References and Authorizations**

The following legal authorities, administrative guidance, and grant agreements were used in the development of this guide:

1. 24 CFR 214
2. HUD Housing Counseling Handbook 7610.1 rev. 6

**Definitions**

**Disaster Assistance Counseling** (DAC) includes all the traditional education and counseling services, where the need for services is created by a disaster, either pending or occurred. A disaster may be a natural or man-made event that is local, regional, or national in scope. See [HUD Housing Counseling Handbook 7610.1. rev. 6](https://www.hud.gov/sites/dfiles/OCHCO/documents/76101HSGH.pdf), Chapter 1-4, F***.*** These services may be **Preparedness** (pre-disaster) or **Recovery** (post disaster). HCAs can offer these services through group workshops and/or one-on-one counseling.  The duration of such housing counseling may be short or long-term.

**Preparedness Assistance Housing Counseling and Education**. Includes preparedness education and housing counseling that occurs before a disaster. It can be group education or one-on-one counseling, or both. This education and counseling provide clients with the tools and information necessary to prepare and implement a home and family emergency preparedness plan. A plan could include family information, communication plan, important papers, financial information, and an emergency kit. See [HUD HC Handbook 7610.1. Rev. 6, Chapter 3, 6, H (1)](https://www.hudexchange.info/resource/4905/housing-counseling-handbook/).

**Recovery Assistance Counseling**. Includes recovery assistance. counseling and education that occurs post disaster. It can be group education or one on-one counseling. Recovery assistance housing counseling will focus on the relocation, re-housing, and rebuilding process for those clients impacted by a disaster. See [HUD HC Handbook 7610.1. rev. 6, Chapter 3, 6, H (2).](https://www.hudexchange.info/resource/4905/housing-counseling-handbook/)

**Glossary of Acronyms and Initialisms:**

* (CDBG-DR) Community Development Block Grants - Disaster Relief
* (CDBG-MIT) Community Development Block Grant - Mitigation
* (COOP) Continuity of Operations Plans
* (CPD) Community Planning and Development
* (DAC) Disaster Assistance Counseling
* (DART) Disaster Assistance and Recovery Team (DART)
* (DAS) Deputy Assistant Secretary
* (DHO) Disaster Housing Operation
* (DRC) Disaster Recovery Center
* (DRS) Disaster Recovery Survey
* (DS) Disaster Survey
* (ESF) Emergency Support Function
* (FEMA) Federal Emergency Management Agency
* (FNS) Food and Nutrition Service
* (FOD) Field Office Directors
* (FPM) Office of Field Policy and Management
* (FRP) Federal Response Plan
* (HCA) Housing Counseling Agencies
* (JFO) Joint Field Office
* (MA) Mission Assignments
* (NDRF) National Disaster Recovery Framework
* (OCB) Office and Outreach and Capacity Building
* (ODM) Office of Disaster Management
* (OHC) Office of Housing Counseling
* (OOA) Office of Oversight and Accountability
* (OPGA) Office of Policy and Grant Administration
* (PDD) Presidentially Declared Disasters
* (POC) OHC Point of Contact for HCAs
* (PRA) Paperwork Reduction Act
* (RBD) National Disaster Resilience (NDR), Rebuild by Design
* (RSF) Housing Recovery Support Function
* (SBA) Small Business Administration
* (SITREP) Situational Report
* (SME) Subject Matter Experts
* (USDA-RD) USDA Rural Development

**HUD Offices**

**Office of Housing Counseling:** Disaster Assistance and Recovery Team (DART). OHC’s DART team leads the OHC’s disaster response activities, including coordinating with emergency management and HCAs for housing counseling support for those impacted by disaster. DART activities include:

* Prepare, educate, and support HCAs and HUD certified housing counselors to help clients dealing with disasters and emergencies.
* Outreach and Monitoring
* BEFORE an emergency, OHC reaches out to agencies when a disaster is imminent.
* AFTER an Emergency Declaration (with individual assistance) by FEMA, OHC surveys agencies to determine operating status, assess damage, and evaluate needs. Support is provided as necessary.
* Monitor response and recovery activities of agencies impacted by disaster.
* Participate in Departmental Disaster Team responses to Major and Presidentially Declared Disasters
* Suggest program and policy improvements.
* Produce awareness and visibility materials.
* Provide support, guidance, and technical assistance, and gather data.

**Office of Disaster Management** (ODM) in the Office of the Deputy Secretary. ODM advises the Secretary, Deputy Secretary, and departmental leadership on all aspects of disaster preparedness, mitigation response, and recovery, and works with others in the Department to identify, mitigate and address national risks to HUD's clients, programs, public resources, and critical infrastructure. ODM ensures that HUD's disaster management programs support national objectives while supporting HUD's primary mission of creating strong, sustainable, inclusive communities and quality affordable housing. The scope of ODM cuts across the entire Department to improve coordination and provide a more integrated, comprehensive effort to support disaster management.

ODM implements HUD missions under the Federal Response Plan (FRP) and the National Disaster Recovery Framework (NDRF) ensuring effective delivery of federal assistance to entities and the public which are affected by a major disaster or emergency declared under the [Roger T. Stafford Disaster Relief and Emergency Assistance Act](https://www.fema.gov/disaster/stafford-act).

**Office of Disaster Recovery** (ODR) within the Office of Community Planning and Development (CPD). Oversees Community Development Block Grants – Disaster Relief (CDBG-DR), Community Development Block Grant Mitigation (CDBG-MIT), [National Disaster Resilience (NDR)](https://www.hud.gov/program_offices/comm_planning/cdbg-dr/ndr), [Rebuild by Design (RBD)](https://www.hud.gov/program_offices/comm_planning/cdbg-dr/rbd), and related programs. For more information: [CDBG-DR: Community Development Block Grant Disaster Recovery Funds](https://www.hudexchange.info/programs/cdbg-dr/).

**Office of Field Policy and Management** (FPM)The field offices staff, including program offices, coordinate disaster preparedness, response, and recovery activities in their jurisdiction. The Field Office Directors (FOD) represent HUD at emergency and disaster related inter-agency meetings. They collaborate with FPM Disaster Recovery Coordinators on implementation and management of HUD teams deployed under FEMA Mission Assignments (MA) in their jurisdiction and the NDRF Housing Recovery Support Function (RSF) Coordinator before, during and after a disaster. They collaborate with the FPM Disaster Recovery Coordinators and the Office of Disaster Management to coordinate with a team of staff working on-site at a FEMA Joint Field Office (JFO) including: a Housing RSF JFO Lead and Subject Matter Experts (SME). They support Headquarters and deployed staff development of a housing impact assessment under the NDRF.

**Chapter 2: OHC Disaster Assistance Procedures for OHC Staff and Program Participants**

**Preparedness**

POCs will work with the agencies in their portfolios of HCAs to prepare Emergency Response Plans and Continuity of Operations Plans (COOPs) in conjunction with their agency’s Work Plan.

POCs will work with the agencies in their portfolios of HCAs to include individual and family emergency preparedness in classes and counseling sessions and encourage clients to create Family Emergency Plans.

OHC will offer various training webinars on emergency preparedness and response.

DART will monitor pending disasters daily, informing POCs and OHC management of pending disasters and other issues.

In advance of a pending disaster (a natural or man-made event that is local, regional, or national in scope), OHC POCS will reach out to participating agencies located in or near the potential impacted area, offering information and resources on preparedness. See Appendix B.

DART will ensure that resources HUD.gov and HUD Exchange are up to date.

**Response**

After a major disaster is declared by the President (PDD), POCs will reach out to their impacted agencies in their portfolio to assess situations and to aid our community partners and HCAs.

DART will send out a Disaster Survey to HCAs in the impacted areas to determine operating status, assess damage, and evaluate needs. Because HCAs and staff may be directly impacted by the disaster, distribution of the survey may not be immediately sent.

For a non-PDD (state, regional or local), the POCs for the impacted agencies will contact them to determine operating status, assess damage, and evaluate needs. The Disaster Survey may be used if appropriate.

DART will collect information on community resources, including FEMA DRCs or resource centers run by FEMA, state and local agencies, or non-profits. This information will be shared with agencies in impacted areas.

OHC POCs submit the responses they receive from the agencies to DART.

DART will compile the data from the Disaster Survey to create a report on the findings. DART will respond to individual agencies or housing counselors as appropriate.

**Recovery**

Recovery technical assistance will be offered by DART and POCs for a PDD, as well as local, regional, or statewide disasters.

DART will collect information on community resources, including FEMA DRCs or resource centers run by FEMA, or state and local agencies, or non-profits. This information will be shared with agencies in impacted areas.

DART will provide outreach materials such as flyers to HCAs, FEMA DRCs, and resource centers.

DART will provide disaster counseling training to housing counselors as needed, using existing materials. New materials may be developed to meet the specific needs of the impacted area.

A Disaster Recovery Survey (pending PRA approval) will be sent out on a biweekly basis by DART to any HUD participating HCAs in an area impacted by a disaster.

The POCs for the HCAs will continue to reach out to the agencies in their portfolios in the impacted area to offer available information and resources on emergency response and recovery.

When asked by HUD ODM, DART will organize participation of HCAs in support of FEMA Disaster Recovery Centers or resource centers run by state and local agencies, or non-profits.

When asked by HUD Management, DART will provide a periodic Situation Report (SITREP) on PDDs to the ODM as well as OHC Management.

# Chapter 3: Deploying Housing Counselors onsite or virtually at a FEMA DRC

Federal agencies may provide disaster assistance under their own authorities or through mission assignments from FEMA, authorized by the [Stafford Act](https://www.fema.gov/disasters/stafford-act).

FEMA issues mission assignments in anticipation of, or in response to, a PDD. Mission assignments allow for deployment, employment, and assistance from the full range of Federal resources to support disaster needs.

Mission Assignment, as defined in the [44 Code of Federal Regulations](https://www.ecfr.gov/current/title-44), is a **work order issued by FEMA to another Federal agency directing completion of a specified task and citing funding, other managerial controls, and guidance.**

Mission Assignments between HUD and FEMA are executed at the Departmental level under one of the following Federal inter-agency frameworks.

* **National Response Framework (NRF):**
	+ Emergency Support Function (ESF) #6 ([Mass Care, Emergency Assistance, Temporary Housing, and Human Services](https://www.fema.gov/sites/default/files/2020-07/fema_ESF_6_Mass-Care.pdf)). Coordinates and provides life-sustaining resources, essential services, and statutory programs when the needs of disaster survivors exceed local, state, tribal, territorial, and insular area government capabilities. Most likely source of MA for HUD immediately after a disaster.
	+ HUD is a support agency in assisting with housing placements after a disaster.
	+ Usually in place within one to two weeks after a PDD. Normally lasts two weeks to 60 days.
* **National Disaster Recovery Framework (NDRF):**
* Mission Assignments under this framework HUD is a primary agency to coordinate the Housing Recovery RSF. As directed by and in coordination with FEMA, HUD will deploy personnel in the field that will provide specialized experience to FEMA to support Housing’s RSF - Disaster Housing Operation (DHO).
* HUD maintains a Disaster Volunteer Database of employees willing to deploy to a disaster.
* [Disaster Volunteer Information - Home (sharepoint.com)](https://hudgov.sharepoint.com/sites/XHUDP/DRP/dvi)
	+ HUD coordinates Federal inter-agency housing recovery efforts. **No new resources authorized under framework**.
	+ Could be executed two weeks to several months after a PDD. Could last month’s depending on level of need.

Once HUD is issued a MA by FEMA, HUD’s ODM and FEMA will determine if there is a need for housing counselors on site at a FEMA DRC. DART will work with the designated ESF or RSF Coordinator and HCAs to coordinate the deployment of HUD certified housing counselors.

DART will reach out to HCAs to determine availability of counselors with disaster assistance counseling expertise and experience to deploy for on-site as well as virtual counseling. Housing counselors will be asked to assist at DRCs and other centers even if the mission assignment doesn’t include housing counseling.

DART will also make available to the ESF or RSF coordinator training materials for DRC staff on the role of housing counselors in disaster recovery efforts. A list of HCAs with disaster counseling experience available for virtual counseling will also be made available upon request at the DRCs.

DART will provide information and training for housing counselors who have agreed to deploy. For example, OHC will make available the “[Housing Counselors Disaster Field Guide: Action Oriented Tool for Disaster Response](https://www.hudexchange.info/programs/housing-counseling/disaster-field-guide/introduction/)” and associated training to those assisting at DRCs. New training will be developed to address local needs.

**Chapter 4: State and Local Government requests for disaster assistance housing counseling services**

When HUD’s ODM reaches out to OHC with a request from a state or local government for assistance from housing counselors, DART will reach out to the state or local government contacts to receive specific details regarding the request.

DART will meet with local and state officials to explain OHC and HCAs roles and responsibilities in the proposed partnership to respond to local disaster assistance needs.

DART will discuss with the state and local government contacts the scope of housing counseling activities that may occur with the provision of disaster assistance related housing counseling.

Counseling activities will include the following processes: Intake; financial and housing affordability analysis; an action plan; and a reasonable effort to have follow-up communication with the client when possible. Disaster recovery needs may require customization of services provided considering the extent and type of emergency**.** The counselor must ensure that their counseling process is appropriate for the circumstances. The housing counseling may be provided onsite or virtually based on local need and availability of housing counselors.

DART will reach out to HCAs to identify the agencies and housing counselors that can respond to the request and facilitate communication between the state or local government contacts and the POCs for the HCAS that agree to participate, and the HCAS. DART will help coordinate the deployment of housing counselors.

**Chapter 5: Funding and Recordkeeping**

**Reimbursement from Comprehensive Housing Counseling Grant**

Agencies can be reimbursed from their Comprehensive Housing Counseling grant for disaster response and recovery activities. However, an HCA’s workplan must include Disaster Assistance Counseling (DAC) activities that will be provided in their service area and outside that service area if appropriate. See below for more information about amending the agency work plan.

HUD recognizes that disaster recovery needs may require customization of services provided considering the extent and type of emergency. For example, counselors may have to address unique financial circumstances or housing issues and focus on ways to overcome specific obstacles to achieving a housing goal.  The counselor must ensure that their counseling process is appropriate for the circumstances and consistent with HUD requirements for reimbursement.

DAC must meet the housing counseling components of intake; a financial/housing affordability analysis; an action plan (except for reverse mortgage counseling); and a reasonable effort to have follow-up communication with the client. HUD recognizes that disaster recovery needs may require customization of services provided considering the extent and type of emergency. The counselor must ensure that their counseling process is appropriate for the circumstances and consistent with HUD’s requirements for reimbursement.

While non-certified personnel may not perform counseling that meets the definition of counseling in [24 CFR §5.100](https://www.ecfr.gov/current/title-24/subtitle-A/part-5), they are allowed to perform and may be reimbursed for routine administrative activities (including compiling materials, conducting initial intake, assembling client documentation, making eligibility determinations, and referring clients to other resources) and providing group education.

In addition, for staff engaged in eligible activities, reasonable costs necessary to the provision of those services (e.g., traveling to the disaster site and related lodging expenses) may also be reimbursed.

For counseling staff engaged in eligible activities, reasonable costs necessary to the provision of those services (e.g., traveling to the disaster site and related lodging expenses) may also be reimbursed.

Reimbursement is not limited to DAC done in response to a PPD but can cover costs related to DAC done in response to local or regional disasters.

If the agency is requesting reimbursement due to an unexpected disaster, the agency should first advise the HUD POC of its plan to bill disaster activities to the grant, revise their work plan accordingly, and work with the POC to have these revisions approved before submitting the GAR.

While DAC costs are eligible for reimbursement, they may not cover all costs incurred for agency participation in the recovery effort. Agencies may seek additional support from other sources. OHC does not have additional grant funds that can be awarded to supplement agency grant awards for their participation in these disaster assistance efforts.

**Recordkeeping**

 **Form 9902**

The HUD-9902 form includes reporting data for disaster education, one-on- one disaster counseling, and impact of one-on-one disaster counseling. The agency’s workplan must include disaster counseling to report the data.

|  |  |  |
| --- | --- | --- |
| Group Education | One-on-One Counseling | Outcomes |
| 8i. Completed disaster preparedness assistance workshop. 8j. Completed Disaster recovery assistance workshop. | 9h. Disaster Preparedness Assistance: Preparing and implementing an emergency preparedness plan.9i. Disaster Recovery Assistance: Referrals to, and the provision of recovery assistance resources for relocation, re-housing, and/or rebuilding. | 10h. Households gained access to disaster recovery non-housing resources after receiving Housing Counseling Services.10i. Households obtained disaster recovery housing resources after receiving Housing Counseling Services. 10j. Households for whom counselor developed or updated an emergency preparedness plan.  |

**Reports for each disaster, deployment, or DRC**

For OHC to report to HUD management, HCAs will be asked to provide data on the number of households provided services during the Recovery Period. Information on the delivery method will also be requested. The request may be made in an email or using a DRS. OHC may provide reporting templates for housing counselors to gather data on clients and services.

**Appendices: Links included below:**

1. OHC Documents
2. [Disaster Ops SOP REV 11-27-23.docx (sharepoint.com)](https://hudgov.sharepoint.com/%3Aw%3A/r/sites/OHC/OHC/KMTest/DAS/_layouts/15/Doc.aspx?sourcedoc=%7BE09BFE95-6762-4033-97F8-FE1E00CB81B0%7D&file=Disaster%20Ops%20SOP%20REV%2011-27-23.docx&action=default&mobileredirect=true)
	1. [Housing Counselors Disaster Field Guide: Action Oriented Tool for Disaster Response](https://files.hudexchange.info/resources/documents/Housing-Counseling-Disaster-Field-Guide-An-Action-Oriented-Tool-for-Disaster-Response.pdf)
	2. Survey to Assess theOperational Status and Capacity of HCA due to a Disaster or National Emergency [DAS - Disaster Surveys - All Documents (sharepoint.com)](https://hudgov.sharepoint.com/sites/OHC/OHC/KMTest/DAS/Disaster%20Recovery/Forms/AllItems.aspx?id=%2Fsites%2FOHC%2FOHC%2FKMTest%2FDAS%2FDisaster%20Recovery%2FOHC%20Disaster%20Operations%20SOP%2FDisaster%20Surveys&viewid=298dcf6e%2D56a4%2D4604%2Db9aa%2D07350c49ea73)
	3. Disaster Recovery Survey *(*PRA pending) (add link)

 5. [DAS - Sample templates for Reporting Spreadsheets - All Documents (sharepoint.com)](https://hudgov.sharepoint.com/sites/OHC/OHC/KMTest/DAS/Disaster%20Recovery/Forms/AllItems.aspx?id=%2Fsites%2FOHC%2FOHC%2FKMTest%2FDAS%2FDisaster%20Recovery%2FOHC%20Disaster%20Operations%20SOP%2FSample%20templates%20for%20Reporting%20Spreadsheets&viewid=298dcf6e%2D56a4%2D4604%2Db9aa%2D07350c49ea73)

1. HUD Exchange Resources
	1. [Housing Counseling Disaster Recovery Toolkit](https://www.hudexchange.info/programs/housing-counseling/housing-counseling-disaster-recovery-toolkit/): Preparing for a Disaster: This guide provides concrete guidance on how HCAs can prepare for a disaster including: 1) information to include in an Emergency Response Plan; 2) how to develop a Continuity of Operations Plan (COOP); 3) assessing community needs and building partnerships when planning disaster recovery services; 4) preparing clients by teaching disaster preparedness.
	2. [Operating Post Disaster Guide](https://www.hudexchange.info/programs/housing-counseling/housing-counseling-disaster-recovery-toolkit/operating/): This guide provides guidance on what HCAs should do following a disaster including: 1) implementing plans to resume and maintain operations; 2) coordinating with local partners to implement effective post-disaster programs in the community; 3) helping clients address their individual recovery challenges; 4) identifying opportunities for housing counseling services.
	3. [Emergency and Disaster Preparedness Group Education Materials](https://www.hudexchange.info/programs/housing-counseling/housing-counseling-works/ohc-disaster-recovery-flyers/): These emergency and disaster preparedness group education materials are available for housing counselors to customize as part of their group education.
	4. [Disaster Recovery Flyers](https://www.hudexchange.info/programs/housing-counseling/housing-counseling-works/ohc-disaster-recovery-flyers/) and other social media: These flyers are a helpful tool when participating in short-term and long-term disaster recovery outreach events in your area. Flyers are available in multiple languages and color schemes.
	5. [OHC Disaster Preparedness and Recovery Webinars](https://www.hudexchange.info/resources/?ct=&tt=&topic=&loc=&predefdr=&dr=&relmat=&orderby=score&q=disaster+webinar#resources):Housing Counseling Webinar Archive.
2. **Other HUD Resources**

[HUD Disaster Resources](https://www.hud.gov/disaster_resources) webpage

1. **Other Federal Resources**
	1. [Federal Emergency Management Agency (FEMA)](https://www.fema.gov/disaster): FEMA aids individuals, governments, and private non-profits after a disaster.
	2. [U.S. Small Business Administration (SBA)](https://www.sba.gov/funding-programs/disaster-assistance): SBA provides low-interest disaster loans to help businesses and homeowners recover from declared disasters.
	3. [Food and Nutrition Service (FNS)](https://www.fns.usda.gov/disaster/disaster-assistance): FNS provides nutrition assistance to those most affected by a disaster or emergency.
	4. [USDA Rural Development](https://www.rd.usda.gov/page/rural-development-disaster-assistance) (USDA-RD): USDA-RD programs and services help rural residents, businesses, and communities impacted by disasters and support long-term planning and recovery efforts.