



Public Housing Agency Disaster Readiness, Response, and Recovery Guidebook

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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing



Increasingly, communities across the United States face disasters ranging in size and frequency that result in both the loss of life and property. The National Oceanic and Atmospheric Administration says, “climate change is supercharging the increasing frequency and intensity of certain types of extreme weather that lead to billion-dollar disasters,” such as drought, wildfires, and floods.¹

Data shows these disasters disproportionately affect low-income and historically marginalized communities,² including the families and individuals who live in HUD-assisted housing. We also know the operational impact these events have on housing agencies.

With these risks in mind, the U.S. Department of Housing and Urban Development (HUD), in line with information from the Federal Emergency Management Agency (FEMA), updated this guidebook specifically to assist housing agencies be ready for, respond to, and recover from emergency events caused by disasters.

Responding to the climate crisis is a priority of the Biden-Harris Administration, and HUD is part of a whole-of-government effort to increase resilience to climate hazards and natural disasters. This is the first goal of [HUD’s Climate Action Plan](#). Mitigating the new risks and existing vulnerabilities exacerbated by climate change is an opportunity to safeguard just and fair outcomes in communities that have all too often bore the brunt of these environmental impacts.

Communities can thrive in the face of climate change when they invest in a resilient recovery. Please use this guide as a source of information as you seek to prepare communities, respond to disasters, and help those you serve recover.

Thank you for your continued leadership.

Adrienne Todman
Deputy Secretary

¹ 2021 U.S. billion-dollar weather and climate disasters in historical context, NOAA, <https://www.climate.gov/news-features/blogs/beyond-data/2021-us-billion-dollar-weather-and-climate-disasters-historical>

² Fourth National Climate Assessment, Volume II: Impacts, Risks, and Adaptation in the United States, U.S. Global Change Research Program, <https://nca2018.globalchange.gov>



We intend this guide to assist PHAs in preparing for, responding to, and recovering from potential disasters. Originally published in 2016, this updated guide adds content based on lessons learned, clarifies PHA roles and responsibilities, and outlines available resources. There are new sections on funding strategies and financial management, communications, and short- and long-term housing options for displaced families. While comprehensive, this document is not exhaustive. It is meant as a collection of information, resources, and best practices that PHAs can draw from to build their personalized disaster and emergency preparation and response plans.

Whether in a disaster-prone region, tailored plans specific to your PHA's risks, capacity, and resources will give you an advantage when disaster strikes. These plans should be created in coordination with your local and state emergency management agencies. Through these efforts, you will ensure HUD/Office of Public and Indian Housing's (PIH's) mission to provide safe, decent, and affordable housing for low-income families in the wake of a disaster.

As always, HUD offices across the country are ready to assist when needed. We hope you find this guide useful in preparing your PHA for a more disaster-resilient, climate-aware future.

A handwritten signature in black ink, appearing to read 'Felicia Gaither', with a long horizontal line extending to the right.

Dr. Felicia Gaither
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Introduction

The Public Housing Agency Disaster Readiness, Response, and Recovery (PHA D3R) Guidebook is designed as a collection of information, best practices, and resources for PHAs. It is divided into three chapters: Readiness, Response, and Recovery. While these represent different phases in the disaster cycle, there aren't always clear distinctions between one phase and another. The overall principles described in these chapters are designed to be scalable and flexible to address all types and sizes of events. For convenience, effort has been made to provide links and references to relevant resources. Over time, these links or references may become outdated. PHAs are encouraged to look for the most recent version of any given resource.

While state and local emergency management agencies are the first-line responders, PHAs play an essential role in the disaster process. PHAs can help expedite disaster recovery by proactively assessing their risks, establishing partnerships with local and state emergency management agencies, and creating tailored plans to ensure the continuity of operations after a disaster. Thus, PHA planning and communication of those plans with staff, residents, and other stakeholders is essential to ensuring an equitable, inclusive recovery should a disaster occur.

This document uses FEMA's definition for a disaster: "an occurrence of a natural catastrophe, technological accident, or human-caused event that has resulted in severe property damage, deaths, and/or multiple injuries."³ Throughout this guide "disaster" and "emergency event" are used interchangeably. Many of these practices would also apply to a pandemic. Remember that state and local emergency management agencies are the first responders in disasters. Proactively developing relationships and working closely with them is an essential part of disaster readiness, response, and recovery.

This document refers to tailoring plans to the specific PHA risks and disaster impacts. The two primary plans are disaster readiness plans (also called D3R Action Plans or Continuity of Operations Plans (COOPs)) and disaster recovery plans (also called Recovery Support Strategies (RSS)). Whatever they call the documents, PHAs should have both a disaster readiness plan prior to any disaster and a disaster recovery plan following a specific disaster.

HUD's Office of Public and Indian Housing (PIH) is here to assist PHAs with technical assistance, guidance where applicable, and resources such as this guide to help you build a more disaster-aware and resilient future.

Background

Just as a PHA's preparations should synchronize with its local emergency responders, HUD's federal guidance builds on resources provided by FEMA. FEMA, with its legal authorities under the [Stafford Act](#), "coordinates the Federal Government's role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all domestic disasters, whether natural or manmade, including acts

³ *Glossary*, FEMA, U.S. Department of Homeland Security (DHS), <https://training.fema.gov/programs/emischool/el361toolkit/glossary.htm>

of terror.”⁴ They have developed many useful resources. For example, [Ready.gov](https://www.ready.gov) is “a public service campaign designed to educate and empower the American people to prepare for, respond to, and mitigate emergencies, including natural and manmade disasters.”⁵

State and local agencies, with the help of local partners like PHAs, are responsible for consolidating initial damage assessments and reporting to the respective governor to request state and federal assistance. Note that most disaster events do not rise to the level of federal assistance; therefore, many disaster-related responsibilities remain at the state, local, and PHA level. Other partners, in addition to state and local emergency responders, which may assist in disasters include the respective state or local office of housing and/or community development, nonprofits, and for-profit companies in the community. Further information on this topic is found under [Chapter I: Readiness, Section 4: Coordination and Partnerships](#).

In addition to resources available online, larger disaster events may warrant a FEMA [major disaster declaration](#) (MDD) or [emergency declaration](#) (ED). MDDs and EDs are issued on a case-by-case basis after the governor or equivalent of the respective state, commonwealth, territory, or tribal entity requests a formal presidential disaster declaration (PDD). PDDs are the requests to the president, and the MDD and/or ED is the formal declaration to release federal assistance. Declarations are posted to FEMA’s [Declared Disasters website](#).

These declarations may open federal assistance available through FEMA programs (i.e., [Individual Assistance](#) or [Public Assistance](#)). More information on the disaster declaration process is found on [FEMA's declaration website](#). Remember that federal assistance requests must meet a dollar level threshold, so reporting your PHA damages to state and local emergency agencies is an important initial step in the disaster response and recovery process.

⁴ *Federal Emergency Management Agency*, Federal Register, National Archives and Records Administration, <https://www.federalregister.gov/agencies/federal-emergency-management-agency>

⁵ *About the Ready Campaign*, FEMA, DHS, <https://www.ready.gov/about-us>

Chapter I: Readiness

Disaster readiness is critical when planning how your PHA will respond to any adverse event that may affect your portfolio. Readiness planning consists of a methodical listing of actions through which one expects to achieve a predetermined objective. In this case, the predetermined objective is defined by the PHA itself but generally involves reducing the potential impacts of any adverse event. The plan should also outline steps increasing the effectiveness and efficiency of the PHA's response if disaster impacts occur.

With readiness in mind, it is understood that many disasters cannot be anticipated. Some areas of the country are more prone to certain types of events than others. The following conditions may pose unique challenges to your PHA and community:

- A disaster often occurs with little or no warning. (e.g., natural disaster, manmade, or terrorism).
- There may be different cascading impacts associated with each type of disaster.
- Inter- and intra-state, local, tribal, territorial, and insular area government mutual aid capabilities may also be affected or exhausted by the event.
- Local government capabilities may be impaired.
- Federal agencies are executing relevant support under their own authorities.
- A MDD or ED may or may not have been issued by the president.
- Misperception of the PHA's roles and responsibilities by media outlets, state, and local government entities, and public.

During the readiness phase, PHAs should consider the following fundamentals of planning discussed in this chapter:

1. Risk Assessment
2. Internal Policies and Resources
3. Training and Communication
4. Coordination and Partnerships
5. Hazard Mitigation and Resilience

Disaster readiness will be more effective when integrated with the community planning process and with broad stakeholder engagement. When preparing your COOP or equivalent document, your housing authority should strive to be part of pre-disaster community collaboration with PHA residents, state, local, private, and nonprofits in your area.

1. Risk Assessment

Emergency readiness is a risk-based process that's highly dependent on location and vulnerabilities. FEMA defines a risk assessment as "a process to identify potential hazards and analyze what could happen if a hazard occurs."⁶ While some risks are broad and may apply to most PHAs, others are highly localized and geographically dependent. As you conduct a risk assessment of your PHA, look for specific vulnerabilities that may pose challenges to your residents and/or properties under different natural or

⁶ *Risk Assessment*, DHS, <https://www.ready.gov/risk-assessment>

manmade disaster scenarios. Knowing your risks ahead of time will help your PHA to prepare for potential impacts. For more information on risk assessments, low- and no-cost preparedness tips, and other disaster-related content, visit [Ready.gov](https://www.ready.gov).

1.1 Local Risk-Based Analysis

Certain disasters are highly geographically dependent, especially weather-related events. Local or state emergency management agencies may have already completed risk assessments in the community. If so, PHAs should use the results of these local planning efforts to assess what hazards have the potential to disrupt day-to-day activities and/or cause extensive property damage, personal injury, and casualties. For planning purposes, PHAs should consider potential effects on residents and operations while assessing other risks. A limited chance for an event to occur is not a reason to discount the risk.

Disaster risks could include natural, technological, or manmade threats. Planning for and responding to those risks may be similar regardless of cause. Planning should recognize a continuum of disaster risks and likelihoods, ranging from small events that occur frequently to massive (regional or national) events that are highly unlikely.

A comprehensive risk assessment enables communities to pinpoint vulnerabilities and identify actions that improve housing resiliency and sustainability. While approaches vary, the four basic components of a risk assessment are to: 1) identify hazards, 2) profile hazard events, 3) inventory assets, and 4) estimate losses. This process measures the potential loss of life, personal injury, economic losses, and property damage resulting from potential hazards by assessing the vulnerability of people, buildings, and infrastructure. While many data sources and tools are available at various levels of government, academia, and the private sector, FEMA has developed the [National Risk and Capability Assessment \(NRCA\)](#). The NRCA is a suite of assessment products that measures risk and capability across the nation in a standardized and coordinated process. When analyzed together, these products will better measure national and community risks, capabilities, and potential gaps.

Vulnerabilities are the intersection between the natural environment, social systems, and the built environment. Therefore, a holistic approach can be helpful. This is especially true in terms of housing, where the choice of where to live is directly tied to the quality and availability of schools for children, access to healthcare, availability of jobs, commuting time, types of neighborhoods, access to social services, places of worship, and other choices that form the fabric of lives and communities.

PHA Risk Assessment Considerations

Natural Environment: The most obvious factor contributing to community vulnerability is location or proximity to hazard-prone areas, such as coasts, floodplains, seismic zones, or potential contamination sites. The characteristics of the incident (i.e., magnitude, duration, frequency, impact, and rapidity of onset) define the physical vulnerabilities of places.

Built Environment: The vulnerability of the built environment is also related to location and proximity to the source of the hazard. Poorly-constructed buildings, inadequately maintained public infrastructure, inaccessible housing, commercial and industrial development, and certain types of housing stock all increase vulnerability. Density of the built environment is also a contributing factor as there is greater exposure and potential for damage with higher density. Housing is susceptible to external factors such as utility outages that affect the habitability of dwellings. Public housing residents may be at greater risk because of age or health issues. Public infrastructure and lifelines are especially critical. The loss of these

assets may place significant financial burden on those who rely on them. The economic health of the community is equally important. Communities with a diversified economy are more resilient.

Barriers to Accessing Services: Institutional barriers to accessing services, resources, and information make some communities more vulnerable than others. Key demographic factors include age, gender, race, color, national origin, physical and behavioral health, persons with disabilities, socioeconomic status, familial status, religion, persons with limited English proficiency, and immigration status. A community's supportive service infrastructure and ability to absorb the impacts of hazards and disasters without outside governmental interventions is also an important factor in the risk assessment.

1.2 Portfolio Analysis

After understanding potential threats and magnitude imposed on the PHA's local community, the PHA should review its portfolio for vulnerabilities and capabilities to weather potential disasters. Assessments should be made for not only the public housing portfolio but also the PHA's office(s), maintenance facilities, community buildings, and other assets. A thorough understanding of the housing stock's condition will assist the PHA to develop a more resilient portfolio, discussed in [Section 5: Hazard Mitigation and Resilience](#).

Physical Needs Assessment (PNA)

As outlined in [24 CFR 905.300\(a\)](#), each PHA must complete a comprehensive PNA for its public housing portfolio. A PNA is a systematic review of all major physical components of property to result in a long-term schedule for replacement of each component and estimated capital costs required to meet the replacement need. The PNA provides data to evaluate the viability of the real estate to continue serving its intended purpose into the future. A PNA is a foundational document for several real estate management functions, including determining a replacement reserve schedule; developing preventative maintenance plans; increasing resilience to potential disasters; performing due diligence at sale, purchase, or financing; marketing and repositioning strategy planning; budgeting; and providing grant support.

The development of a PNA will assist the property owner in prioritizing current capital expenditures and identifying synergies and efficiencies in the execution of major repairs and replacements. A PNA is a key component of a risk management approach to real estate management and oversight and will assist a PHA's ability to:

- Develop a long-term property-specific strategic plan
- Prioritize budget needs in a limited funding environment
- Recognize synergies and efficiencies
- Communicate to stakeholders, including public housing residents
- Manage the risk of critical component failure
- Organize a project's physical data as a reference and resource for future evaluations
- Develop preventative maintenance and resiliency strategies
- Model alternative work sequence and timetables
- Assess the long-term viability of maintaining the property in public housing portfolio

It is important to note that appropriation laws from fiscal years (FYs) 2015 to 2021 specified that HUD could not utilize the appropriations to require or enforce a PNA requirement. The PNA prohibition was removed in the FY 2022 Appropriation Law, and the PNA is once again a requirement. HUD is developing

additional PNA guidance and encourages PHAs to monitor HUD's [Physical Needs Assessment of Public Housing website](#).

2. Internal Policies and Resources

HUD allows flexibilities for PHAs to administer the day-to-day operations within the parameters of the Housing Choice Voucher (HCV) and Public Housing Programs regulations. Developing clear internal policies and documenting potential resources is essential during the disaster planning phase. Knowing the resources available can both enhance the speed and success of recovery and increase resiliency. Pre-disaster actions can also reduce the scale and magnitude of recovery needs. PHAs should identify possible resources and develop procedures to implement where applicable.

When looking internally at PHA policies and resources during the readiness phase, there are four primary groupings to consider:

- PHA policies
- Continuity of Operations Plans (COOPs)
- Funding resources
- Insurance

2.1 PHA Policies

Careful consideration should be given while developing or revising PHA policies. Of which, the structure and content can often have direct bearings on how a PHA addresses the impacts of a disaster. For example, disaster preferences and transfer policies formally adopted by the PHA prior to a disaster can provide additional housing options and expedite the transition back to permanent housing.

Admissions and Continued Occupancy Policy (ACOP)

While federal statutes and regulations require PHAs to adopt certain governing and operating policies for the Public Housing Program, HUD grants PHAs considerable discretion in establishing and implementing many policies. PHAs communicate those policies, rules, and requirements concerning their operations, programs, and services through the ACOP. The ACOP is the principal document describing in detail the PHA's policies with respect to key topics such as eligibility, tenant selection, admissions preferences, waitlist procedures, and transfers, to name a few.

The ACOP is an important document for tenants, prospective tenants, community members, and HUD staff when inquiring about specific PHA policies. When reviewing or revising an ACOP, careful consideration should be made to assess how policies can influence a PHA's ability to effectively respond to a disaster. For example, PHAs have the discretion to establish guidelines for an emergency transfer when a unit must be evacuated due to a health and safety hazard emergency, which can be formalized in a standalone Emergency Transfer Plan. PHAs looking for additional guidance should refer to the [ACOP Toolkit and ACOP Development Guide](#), which will provide PHAs with resources that:

- Demonstrate what content should be covered in a typical ACOP
- Provide practice tips and sample approaches that PHAs can use to formulate internal policies
- Note where PHAs have discretion to create and decide policy

- Provide example ACOP policy language

HCV Administrative Plan

Like the Public Housing Program, a PHA must adopt a written administrative plan that establishes local policies for administration of the HCV Program in accordance with HUD requirements, as described in [24 CFR 982.54](#). The HCV Administrative Plan and any revisions of the plan must be formally adopted by the PHA Board of Commissioners or other authorized PHA officials. The HCV Administrative Plan states PHA policy on matters for which the PHA has discretion to establish local policies.

Key components of the HCV Administration Plan that directly influence the PHA's rehousing options include the description of the selection and admission of applicants from the PHA waiting list. This includes PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list. Additional guidance can be found in the [Waiting List and Tenant Selection](#) chapter of the [Housing Choice Voucher Guidebook \(7420.10G\)](#) and in [The Housing Choice Voucher Program Guidebook](#).

Furthermore, the procedural guidelines and performance standards for conducting Housing Quality Standards (HQS) inspections can be instrumental in the response phase and should be clearly detailed.

Lastly, the PHA should describe its discretionary policies related to extension of search time, including a description of how the PHA determines whether to grant extensions, and how the PHA determines the length of any extension. Additional guidance can be found in the [Housing Search and Leasing](#) chapter of [The Housing Choice Voucher Program Guidebook](#).

Disaster Preference

The PHA may establish a system of local preferences for the selection of families admitted to its public housing and HCV programs. One of the options is the disaster preference, which includes families that are involuntarily displaced due to either government action or a natural disaster. The inclusion of a disaster preference can be a valuable instrument to expedite the permanent rehousing efforts for those affected. HUD requirements regarding preferences can be found at [24 CFR 960.206](#) (public housing) and [24 CFR 982.207](#) (HCV).

Preferences are only used to establish the order of applicants on the waiting list. They do not affect eligibility for applicants who are otherwise ineligible, nor do they change the right of a PHA to adopt and enforce tenant screening criteria. If a PHA wishes to change the current preference system, it is required to update the ACOP and/or HCV Administrative Plan and publicize and post copies of any newly adopted and implemented tenant selection policies. Changes to the preference system must also conform to the Consolidated Plan for the PHA's jurisdiction. Pursuant to [24 CFR 903.7\(b\)\(2\)](#), changes to admission preferences need to be reflected in the annual PHA Plan. The PHA must follow [24 CFR 903.21](#) requirements for amending or modifying a PHA Plan. If the change to a PHA's preference system is considered a significant amendment to the PHA Plan, then the PHA is subject to requirements for consultation and period for public comment under the PHA Plan requirements pursuant to [24 CFR 903.21\(b\)](#). Additional information can be found in the [HCV Program Guidebook](#) and Section 5: PHA Selection Preferences of the [Waiting List and Tenant Selection](#) chapter of the [Public Housing Occupancy Guidebook](#).

Procurement Policy

PHAs are required to establish and follow a written procurement policy consistent with [2 CFR 200.317-327](#), including applicable contract provisions in [Appendix II](#) to [2 CFR part 200](#). The procurement process is founded on several important principles, including:

- Allow for a fair and open competitive process for the PHA's business
- Assist the PHA in being a good steward of public funds
- Provide clarity in business dealings
- Provide the best value product or service for the agency
- Comply with all applicable state and local laws, HUD regulations, and PHA policies
- Avoid ethical pitfalls

With these principles in mind, an emergency event does not relinquish a PHA from following its established procurement policy. The executive director and/or the designated contracting officer will find it beneficial to be well acquainted with their PHA's procurement policy to efficiently navigate the process, to become familiar with the emergency procurement process, and to determine what contracts are advantageous to have in place prior to a disaster.

Periodically, PHAs should review and edit their procurement policy to ensure compliance with federal regulation, state and local laws, and opportunities to maximize the PHA's ability to respond to an emergency. For additional guidance, refer to HUD's [Procurement Handbook for Public Housing Agencies \(HUD Handbook 7460.8 REV 2\)](#) and [PHA Procurement Training](#).

2.2 COOP

PHAs are encouraged to view disaster preparedness and continuity planning as a fundamental part of their business model. The question should not be *if* a business disruption will occur but, instead, *how* the business will endure, respond, and recover from disruptions. In the disaster management world, this is often referred to as a Continuity of Operations Plan (COOP). Whether you call your disaster plan a COOP or something else, it is to ensure that an organization can perform its essential functions and provide critical services no matter the threat or hazard faced.

For assistance in developing a COOP, refer to FEMA's [Continuity Plan Template and Instructions for Non-Federal Entities and Community-Based Organizations](#), which can be adapted for a PHA's use. PHAs may find it advantageous to discuss common resources, risks, and response methods among PHAs in their area, with similar portfolios, and/or common risk exposure as they develop their COOP.

The process should consider three major elements:

- PHA business operations
- Impacts to public housing residents and HCV participants
- Impacts to the physical infrastructure and housing portfolio

Community planning typically addresses the continuum of risks facing a PHA. This includes planning for events ranging from frequent, low-impact risks, such as power outages or equipment failures, to infrequent, higher risks, such as major natural or manmade disasters. PHA planning should focus on filling gaps around community planning as well as meeting its own unique needs. For example, to supplement the community's planning for power outages, the PHA may wish to purchase portable

generators to ensure proper heating, cooling, and necessary refrigeration of medicines for vulnerable residents during a power outage.

PHA disaster planning should initially focus on the development of a COOP to assist staff and management. This plan will help prepare PHAs for a wide variety of events with different magnitudes and effects on a PHA's business operations, residents, and physical infrastructure and housing portfolio.

Your continuity plan should start with the following assumptions:

- Emergencies or threatened emergencies may affect a PHA's ability to operate
- Local resources may be unavailable if a disaster is widespread
- Staff may be adversely affected by a disaster and unable to assist in responding
- Financial ability to secure, repair, or rebuild permanent housing that may be impaired

Questions

The following questions should be considered as you begin this process:

PHA Leadership

- What is the chain of authority?
- Are there protocols for succession or delegation of authority?
- What information does leadership need in an emergency, and how do they receive updates?

PHA Staff

- Which team members provide or support essential operations?
- Which team members advise or update leadership?
- How does the PHA communicate with residents and external stakeholders, including HUD, FEMA, and insurance companies?
- Who has access to each property, building, or office?
- What information does staff need in an emergency, and how do they receive updates? Note, depending on the organization of your PHA, it may be helpful to divide this list into administrative and programmatic staff.

PHA Residents

- What information do residents need in an emergency, and how do they receive updates?
- How do they, in turn, communicate with the PHA?
- Do any residents have special needs that prevent them from evacuating?

Note that property managers should make reasonable efforts to identify residents with special needs (e.g., elderly persons, children, persons with a disability, or limited English proficiency) that may need special assistance during a disaster; however, they cannot inquire into the specific nature of the need except to the extent that it affects their ability to evacuate. Coordinate with family, emergency contacts, staff, or social services for delivery of necessary services and evacuation assistance. Determine if any additional planning must be taken to ensure residents with an assistance animal will be able to keep the animal with them during an evacuation and/or relocation.

Best Practices

The plan should cover how the PHA intends to both address urgent needs as well as conduct core functions. These best practices are further discussed below:

- Coordinate with local partners leading the community's evacuation efforts to determine available assistance PIH program participants can utilize, and inform PIH program participants of those resources when evacuation is required
- Maintain critical operations through means such as identifying telework/remote work strategies for employees in case the PHA office is affected as well as identifying potential other work locations should the central office be affected substantially
- Maintain operational and financial records such as payroll, rent, insurance documents, Housing Assistance Payments (HAP), and procurement (consider methods like fire/waterproof safes or cloud-based storage as opposed to local storage on facility computers that could be damaged during the disaster)
- Reestablish or maintain general communication (e.g., telephone, Internet sites, email, and/or social media) with residents, community, and business partners
- Identify temporary housing options for displaced households (i.e., with local voluntary agencies, in PHA community space if appropriate, or in vacant units)
- Determine the location of public housing residents and HCV participants using predetermined contact methods and lists
- Inspect units to determine repair needs, recording their condition and taking photos, videos, and notes where appropriate for insurance and potential FEMA reimbursement
- Secure, stabilize, and assess damage to non-residential PHA property
- Predevelop checklists and record logs to standardize the assessments and monitoring of the PHA portfolio

Preparing for resident evacuation is particularly important as some communities may infer that the PHA is responsible for the planning and implementation. The PHA should understand the larger community plan and ensure that decisions are integrated with the needs of the PHA. In general, the residents of the PHA are members of the community and community evacuation efforts should include them. Like others, it is helpful if PHA residents know the evacuation plans for their community, should the need arise.

PHAs should maintain an updated unit and occupancy record for each building and project which can be accessed remotely so that the information is centrally available.

PHAs should establish a plan to temporarily accommodate residents in other PHA properties if possible (e.g., common areas of other projects or vacant units). This plan should consider the maximum number of occupants that a space can legally and comfortably support, availability of security personnel to protect residents, accessibility issues, and access to bathrooms and cooking facilities. If volunteer agencies are present in a community, the PHA should work to have an established relationship with those agencies to assist its residents with temporary housing should displacements occur.

Post-disaster, assessing the impacts will be one of the first steps for the PHA. To assist and standardize the process, the PHA should consider predeveloping checklists and logs. For example, a business operations assessment checklist, public housing property assessment checklist, evacuated and displaced program participant log, and others will assist the PHA to organize and evaluate the information collected. Predevelopment of these resources will provide the PHA with ample time to consider all

pertinent information required for the subject matter and the best means to organize and streamline the information. This will avoid including nonessential items that increase reporting burden, prevent missing any essential elements, and circumvent overly complex reporting methods. Furthermore, predeveloped checklists and other materials allow staff to be cross-trained prior to the disaster.

PHAs can facilitate post disaster recovery by maintaining a current list of disaster recovery contractors in addition to normal maintenance staff and contractors. There are often specialized contractors who focus on services such as cleaning properties affected by a disaster. Insurance agents may help create such a list. PHAs should become familiar with and follow procurement policies under [2 CFR part 200](#) as well as applicable HUD emergency procurement regulations (see HUD's [Procurement Handbook for Public Housing Agencies](#)).

PHAs should prepare telework/remote work options for employees should the central office be affected. This will ensure employees who weren't affected by the event can resume operations quickly post-event or post-evacuation. Another best practice is to identify alternative locations where PHA operations can continue in the event its central office or other facilities are affected by a disaster. To the greatest extent possible, any alternative site should be selected based on accessibility for staff, residents, HCV participants, landlords, etc. The [Developing Emergency Relocation Group Member Planning Guides: A Guide for ERG Positional Requirements Planning](#) can be used by the PHA to assist in the development of its own relocation plan. In the immediate aftermath of a disaster, another government agency or unaffected neighboring PHA may be able to provide support.

PHAs could also consider cloud-based storage of important records and documents and/or storing paper copies at an off-site location. Important documents include recent resident records, insurance policies, management documents, construction-related documents, HUD Annual Contribution Contracts, and HUD award letters. Further examples include blueprints of properties, schedules of major systems upgrades, lead-based paint clearance certificates, and certificates of occupancy. These types of documents will be useful in handling property clean up and demolition, rebuilding, and filing insurance claims. When assessing the types of records to be stored offsite, be sensitive to privacy and other sensitive information (see HUD's [Protecting PII: Capacity Building Guidance on Protecting Privacy Information](#)). Refer to the National Archives' [Essential Records Guide](#) as a resource when developing a record retention policy.

2.3 Funding Sources

To mitigate and/or respond to a catastrophic event in a timely manner, PHAs should know about potential financial and non-financial resources. These resources will come in a variety of forms, at different intervals, and with specific requirements that PHAs will need to be familiar with. The compliance requirements of one source of disaster management funding may conflict with the requirements of another source. A careful understanding of the details of each funding source will make a PHA's recovery efficient and will decrease the likelihood of having to pay funds back due to misuse.

[Appendix B: Funding Sources](#) contains frequent funding sources PHAs have used to prepare for, mitigate, and recover from a disaster. PHAs are encouraged to further explore additional funding sources made available within their state and local jurisdiction for additional support. Funding sources listed are further expanded upon in each chapter when the fund becomes available.

2.4 Insurance

Following a catastrophic event, proceeds from a PHA's insurance policy will be the primary source of funding for recovery. It is, therefore, imperative that a PHA have adequate insurance for all properties and administrative facilities. Guidance pertaining to public housing insurance requirements can be found at [24 CFR 965](#) and [Notice PIH-2016-13](#). In addition, PHAs must operate (and rebuild public housing) in compliance with their ACC requirements, including insurance requirements, and other applicable HUD requirements.

To select adequate coverage, PHAs should refer to their most recent risk assessment and diligently research the most applicable line of coverage commensurate with those risks. The property insurance must be written on a replacement cost basis. This means that the insurance will pay the cost to replace the destroyed or damaged property on the same premises with other property of comparable material and quality, or the actual amount spent to repair or replace, whichever is less. As opposed to insuring on an "actual cash value" basis, depreciation based on the age and type of construction of the property may not be taken into consideration when adjusting a loss.

Flood Insurance

Of special note, the Public Housing Program (e.g., Capital Fund regulations at [24 CFR 905.308](#)) and environmental regulations ([24 CFR parts 50](#) and [58](#)) as well as the public housing ACC requires flood insurance on all properties located in a flood plain, as determined in the Federal Government's National Flood Insurance Program (NFIP). Specifically, the flood plain refers to the 100-year flood plain, an area with a 1% annual chance of flooding. Compliance with this requirement is critical. If a PHA fails to have the required flood insurance, they will not be covered by FEMA for the damages incurred in a major disaster declaration. Furthermore, flood insurance for properties within the 500-year flood plain, an area with a 0.2% annual chance of flooding, is not required by HUD to have flood insurance but is highly recommended.

The FEMA floodplain is subject to change due to erosion, changes in climate and weather patterns, and many other variables. Neither FEMA nor HUD will advise a PHA if the flood maps have changed. As a result, PHAs should review FEMA flood maps on a recurring basis to determine if the floodplain now encompasses additional public housing properties. PHAs can identify if properties are in a flood plain at the [FEMA Flood Map Service Center](#) by simply entering a property's address. In addition, FEMA's [Email Subscription](#) allows individuals to sign up for email notification when the flood maps are changed.

3. Training and Communication

Often crisis situations occur without warning. As a result, there may not be time to give detailed instructions to staff and residents. Therefore, stakeholders, especially PHA staff, should clearly understand their roles and responsibilities before, during, and after a disaster should the time come. Laying this groundwork is critical for successful response and recovery; time may save lives and assets. PHAs must ensure staff is aware of and able to perform their tasks outlined in the COOP. Training will assist staff and residents to adapt to how the work environment changes after a disaster and will expedite the recovery process.

3.1 PHA Staff

PHA leadership and staff must be sufficiently trained to perform their duties in a continuity environment (i.e., one in which the organization is faced with an interruption of normal operations). This may include challenging situations, such as physical separation from family. Some employees may be required to report to work at a primary or alternate site, while others may be directed to telework from home or to remain available until needed. Assign and train backups, cross- train, and/or provide written documentation so that all skillsets will be available. Consider the following training areas:

- **PHA's emergency procedures:** continuity plan, delegation of authority
- **Emergency response:** assisting senior citizens and those with disabilities, first aid, psychological first aid
- **Applying for assistance:** applying for FEMA funds; avoiding duplication of benefits from HUD and FEMA; assisting residents in avoiding duplication of benefits, which could result in the recapture of funds and financial hardship
- **Communication:** communicating with public housing and HCV residents; communicating with property managers and property owners; communicating with HUD, FEMA, community partners, and other external stakeholders; communicating with the media

In addition, training exercises, drills, and simulations are valuable in helping members of the team understand the challenges and their roles during an emergency. These conversations may be held independently or included in staff meetings, started with questions like “how would we respond to a...?” or “what is our role in the PHA Plan for...?” and followed by facilitated discussion. Exercises may also take the form of drills or simulations.

3.2 Residents

Residents should be informed of disaster procedures to maintain their health and safety during and after catastrophic events. PHAs should communicate this information frequently through diverse methods, such as email, text message, printed flyers, social media posts, and in-person meetings. Consider the following preparation methods:

- **Hold disaster readiness events:** hold disaster preparation seminars with public housing residents; host drills or simulations to set expectations
- **Empower:** identify residents or resident groups who wish to take on responsibilities during a disaster; provide basic first aid classes; encourage use of resources like [Ready.gov](https://www.ready.gov) and the [FEMA Mobile App](#) to receive real-time weather alerts, updates, and available assistance
- **Request information:** ask for emergency contacts; encourage high-risk residents to wear medical alert bracelets in case they are unable to provide their information
- **Make plans:** educate residents on your plans to communicate with displaced residents (e.g., local media and/or social media); advise residents to contact the PHA if they choose not to voluntarily evacuate; establish methods to check in with staff following a disaster; share procedures for public housing and HCV residents to notify the PHA of their whereabouts and damages to their units; ensure residents know where to shelter-in-place in case of tornadoes, earthquakes, or hurricanes, including appropriate signage
- **Prepare resources:** post locations of emergency radios; maintain a supply of first aid and emergency supplies (e.g., water, flashlights, batteries, and food)

4. Coordination and Partnerships

As most PHAs do not independently have the resources to respond to a disaster, building partnerships with entities across the community will better align resources to support recovery efforts should a disaster occur. Disasters require the joint efforts of all community entities to overcome their effects. To accomplish this, PHAs should understand the larger community disaster plan and integrate their plan within that framework. This requires establishing relationships with other community stakeholders to expedite an equitable, resilient recovery.

4.1 Partner Agencies

PHAs should have an up-to-date list of local disaster services, emergency responders, and resources beyond 9-1-1. Storing this type of information electronically as well as physically both on and offsite will ensure it remains readily available. PHAs should work in advance with local jurisdictions and first responders to understand and determine who will take responsibility for property preparedness and evacuation, as well as what resources and information will be shared in the event of a disaster. This contact information can be stored in the PHA's continuity plan, see FEMA's [Continuity Plan Template and Instructions for Non-Federal Governments](#).

Potential partners include:

- Municipal, county, and state disaster response teams
- State and local governments
- HUD field offices
- FEMA
- Emergency medical services
- Police department
- Fire department
- Nonprofit and charitable organizations
- The Red Cross
- Faith-based organizations
- Food banks
- Emergency shelters
- Utility companies
- PHA insurance agent
- Emergency contractors
- Neighboring PHAs

4.2 Roles and Responsibilities

Pre-disaster coordination activities will clarify what post-disaster support local, state, and territorial entities can provide, define how this support will be functionally linked to PHAs, and establish information sharing and communication protocols. These coordination efforts will encourage and support planning for post-disaster permanent housing requirements by the state, local, and territorial entities that lead local community planning and development as well as addressing housing needs, land use, and building code administration.

FEMA created a National Disaster Housing Strategy that goes into more detail about the different roles and responsibilities of local, state, and federal partners in preparing for disasters. The [National Disaster Housing Strategy](#) document, while more than a decade old, is still an extremely useful resource that should be reviewed before engaging in coordination efforts as it ensures common understanding of possible roles and responsibilities. Roles for each primary stakeholder are listed below.

PHA

- Analyze the portfolio risk and opportunities to mitigate risk and bolster resilience
- Develop ACOP and HCV Administrative Plan, and follow policies as it relates to disasters
- Establish formal and informal communication methods to circulate information among PIH program participants (e.g., email, social media, mobile text alerts, flyers, and/or pamphlets)
- Conduct impact assessments of the portfolio (i.e., business operations, program participants, and public housing stock) after a disaster
- Document damages and repair costs with information, such as videos, photos, and receipts
- Promptly repair and/or restore damaged public housing property
- Track public housing and HCV displacements and public housing damages, and report to HUD
- Evaluating financial resources and associated requirements (i.e., submitting insurance claims and applying for FEMA Public Assistance (if available))
- Submit disaster waiver requests

Residents

- Understand PHA and community disaster plans, including evacuation protocols
- Maintain up-to-date contact information with the PHA
- Inform the PHA of any reasonable accommodations
- Punctually report damages and/or displacement to PHA
- Seek out appropriate entities for resources addressing personal needs (i.e., medical, food, family, and unification)
- Applying for [FEMA Individual Assistance](#) (if available)

HUD

- Provide program technical assistance for affected PHAs
- Process disaster waiver requests
- Administer financial programs for PHA's resilience and recovery efforts (e.g., CFP; CFFP; Capital Fund Emergency/Natural Disaster Fund; CDBG-DR grants to states, local governments, and Indian tribes; EPC; Op-Sub; and OFFP)
- Analyze impacts to the PIH portfolio and consolidate reports
- Evaluate demolition/disposition, redevelopment, and repositioning proposals

State and Local Agencies

- Function as emergency first-responders after an incident, including fire, medical, and police services
- Develop and maintain overarching emergency operations plan for the community
- Proactively coordinate community partners and synchronize efforts to address the needs of the community (including PHA resident needs) efficiently and effectively
- Aggregate damage assessments to submit to state/territory/locality government for local leaders to request emergency or major disaster declaration to unlock federal resources (like FEMA Public Assistance)

FEMA

- Coordinate the Federal Government's response and recovery from all domestic disasters

- Assist state and local governments and some nonprofits with debris removal, emergency protective measures, and the restoration of facilities damaged by a disaster
- Administer the [Public Assistance](#) and [Individual Assistance](#) programs where FEMA MDDs and EDs are declared

4.3 Community Collaboration

Ongoing collaboration between the PHA and community partners is essential to maintaining PHA readiness in the event of a disaster. While initial coordination activities are important in building relationships with community partners, consistently maintaining those relationships is essential. Over time PHA management and staff change, policies and procedures require revisions, and roles and responsibilities need updates. Addressing these changes requires the PHA and community partners to engage in ongoing collaboration where parties notify each other of changes or concerns as they become apparent. Facilitating an environment conducive to partnerships and collaboration can be accomplished by participating in recurring meetings, after-action reviews, identification of recovery support gaps ahead of disasters, filling housing recovery gaps post-disaster, and other initiatives aimed at improving the effectiveness of permanent housing recovery efforts. The following guideposts can be used to establish the framework for effective collaboration between the PHA and community partners:

- Identify guiding, shared recovery principles during the readiness phase
- Outline pre- and post-disaster roles and responsibilities for community partners and recommend leadership roles across all entities
- Describe how the PHA and community partners will build, sustain, and coordinate the delivery of the recovery core capabilities
- Understand the relationship between prevention, protection, mitigation, response, and recovery
- Promote inclusive and equitable coordination, planning, and information sharing
- Leverage opportunities to increase resilience and incorporate climate adaptation and mitigation measures pre- and post-disaster
- Identify scalable and adaptable organization for coordinating recovery
- Describe key factors, activities, and considerations for pre- and post-disaster recovery planning
- Ensure recovery resources include a wide range of community stakeholders, including individuals, voluntary, nonprofit, philanthropic, private sector organizations, and governmental agencies
- Conduct after-action reviews with all stakeholders to determine successful implementation and areas of improvement

5. Hazard Mitigation and Resilience

A PHA will have an accurate depiction of its portfolio’s vulnerabilities after the potential risks following the assessment of the public housing portfolio, as outlined in [Section 1: Risk Assessment](#). With this knowledge, the PHA can begin to formulate a strategy to mitigate issues or implement measures to create a more resilient portfolio. PHAs may find it beneficial to research how other housing entities, in both the private and public sector, have overcome common obstacles and how the practice may prove beneficial to their needs. As reminder, each circumstance is unique and what is beneficial in one instance could be detrimental in another. With that in mind, extreme care should be taken while analyzing possible hazard mitigation and resiliency measures. Furthermore, PHAs may find instances where the long-term financial interest to preserve affordable housing and to maintain a more resilient

portfolio is to reposition or redevelop a property. All of this must be taken into consideration to tailor a long-term plan that is most suitable for the PHA and can be formalized in the PHA Plan.

5.1 Financial Resources

As PHAs explore hazard mitigation and resilience measures, financial resources must also be explored to determine what is financially feasible. Available funds should then be leveraged to maximize the tolerance of the public housing portfolio. The following list includes, but is not limited to, financial resources the PHA may be able to utilize for hazard mitigation and resilience. Some funds may only be available in certain situations and/or require an application from the PHA. As the list only contains a summary of the financial resources, a PHA should conduct due diligence to thoroughly understand the eligibility, requirements, and administration of each funding source.

Operating Fund (Op-Fund): PHAs receive annual subsidy for operations and management of public housing properties. A PHA can use Operating Funds for operating and management costs, including administration, routine maintenance, anti-crime and anti-drug activities, resident participation in management, insurance costs, energy costs, as appropriate, related to the operation and management of mixed finance projects, and repayment of debt service to finance rehabilitation and development of public housing units. Additional information can be found on HUD's [Public Housing Operating Fund website](#) and [Eligible Uses of the Operating Fund Program website](#).

Operating Fund Financing Program (OFFP): PHAs are permitted to borrow private capital to finance development and modernization of public housing rental units. Under OFFP, a PHA may use a portion of its Operating Fund reserve balances to collateralize financings and pay debt service and customary financing costs. The application process and additional information can be found in Chapter 11.2. Operating Fund Financing Program of the [Capital Fund Guidebook](#).

Capital Fund Program (CFP): HUD provides PHAs with annual funding for the development, financing, and modernization of public housing projects and for management improvements via the Capital Fund Program. A PHA's CFP will often be the first financial resource available that can be utilized for hazard mitigation and resilience. A full description of eligible costs can be found in the [Capital Fund Guidebook](#).

Capital Fund Financing Program (CFFP): Hazard migration and resiliency measures may exceed a PHA's available CFP. Under the CFFP, a PHA may borrow private capital to make improvements and pledge, subject to the availability of appropriations, a portion of its future year(s) annual CFP to make debt service payments for either a bond or conventional bank loan transaction. To receive HUD approval, a PHA must submit a financing proposal that includes a term sheet, financial documents, and a justification for the use of CFP for financing. The application process and additional information can be found in the [Capital Fund Guidebook](#) and HUD's [CFFP website](#).

Energy Performance Contracting (EPC): HUD's innovative financing technique, EPC, uses cost savings from reduced energy consumption to repay the cost of installing energy conservation measures. Normally offered by energy service companies, this innovative financing technique allows building users to achieve energy savings without upfront capital expenses. The costs of the energy improvements are borne by the performance contractor and paid back out of the energy savings. A full description of the program and additional information can be found on HUD's [EPC website](#).

Building Resilient Infrastructure and Communities (BRIC): FEMA's competitive grant, BRIC, supports states, local communities, tribes, and territories as they undertake hazard mitigation projects, reducing

the risks they face from disasters and natural hazards. The BRIC Program's guiding principles are supporting communities through capability and capacity building, encouraging and enabling innovation, promoting partnerships, enabling large projects, maintaining flexibility, and providing consistency. A state or territory must have received a MDD in the 7 years prior to the annual grant application period start date to receive BRIC funds.

Entities interested in creating a BRIC subapplication, such as a PHA, should contact their town/city/county managers, planning, and/or emergency management officers within their local governments. Subapplicants cannot submit directly to FEMA but must submit to their state, as the primary applicant, for review and submission. Contacting the state hazard mitigation officer or equivalent representative can be helpful in choosing which hazards pose the greatest threat and determining the best strategy for mitigation. For a complete overview of the program and additional resources visit FEMA's [BRIC website](#).

Hazard Mitigation Grant Program (HMGP): FEMA's HMGP provides funding to state, local, tribal, and territorial governments so they can develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in their communities. When requested by an authorized representative, this grant funding is available after an MDD.

Eligible states, territories, and tribal governments can submit applications on behalf of subapplicants for HMGP funding. Homeowners, business operators, and nonprofit organizations cannot apply directly to FEMA but can be included in a subapplication submitted by eligible subapplicant. For more information, please contact your local government or state. A complete overview of the program and additional resources can be found on FEMA's [HMGP website](#).

Hazard Mitigation Grant Program Post Fire Assistance (HMGP Post Fire): Wildfires can destroy homes, businesses, infrastructure, natural resources, and agriculture. They can also increase secondary hazards and leave areas prone to floods, erosion, and mudflows for many years. FEMA's HMGP Post Fire is available to help communities implement hazard mitigation measures that substantially reduce the risk of future damage, hardship, loss, or suffering in any area affected by a fire for which assistance was provided under Section 420 Fire Management Assistance Grant (FMAG).

Eligible states, territories, and tribal governments affected by fires resulting in a FMAG declaration can submit applications on behalf of subapplicants for HMGP Post Fire funding. Homeowners, business operators, and nonprofit organizations cannot apply directly to FEMA but can be included in a subapplication submitted by eligible subapplicant. For more information, please contact your local government or state. A complete overview of the program and additional resources can be found on FEMA's [HMGP Post Fire website](#).

Flood Mitigation Assistance (FMA): FEMA's FMA program is a competitive grant program that provides funding to states, local communities, federally recognized tribes, and territories. Funds can be used for projects that reduce or eliminate the risk of repetitive flood damage to building insured by FEMA's [National Flood Insurance Program](#).

Eligible states, territories, and tribal governments can submit application on behalf of subapplicants for FMA funding. Homeowners, business operators, and nonprofit organizations cannot apply directly to FEMA but can be included in a subapplication submitted by eligible subapplicant. For more information, please contact your local government or state. A complete overview of the program and additional resources can be found on FEMA's [FMA website](#).

Chapter II: Response

The response phase occurs in the immediate aftermath of a disaster and, in cases with advance warning, right before. Personal safety and wellbeing are the primary concerns during this phase. With the PHA's core responsibility related to housing, local emergency responders and other organizations will play a pivotal role in addressing the immediate needs of PIH program participants. Although outside the PHA's standard book of business, PHAs will find themselves in a unique position to help inform a high-risk segment of the population of available resources that can be instrumental in saving lives and protecting personal wellbeing.

During the response phase, PHAs should consider the following fundamentals of planning discussed in this chapter:

1. Activation and Deployment
2. Portfolio Assessment
3. Informing HUD

The response phase should include an emphasis on understanding the effects of the disaster through assessment of the PHA's portfolio. This will allow PHAs to appropriately prioritize recovery efforts and maximize the impacts of available resources, including finances and staff.

1. Activation and Deployment

Some events like tropical systems and wildfires will provide the PHA with advanced warning. As conditions can quickly change, the PHA should utilize appropriate resources to stay informed of the potential risk to the portfolio and adjust efforts accordingly. Some available resources include:

- [The National Weather Service](#)
- [National Oceanic and Atmospheric Administration](#)
- [National Interagency Fire Center](#)
- [Ready.gov/alerts](#)
- [FEMA Mobile App](#)
- [Emergency Alert Systems](#)
- State and local news

PHAs should take advantage of advance notification to review their established procedures, connect with local emergency partners, secure essential documents, and ensure they are prepared to deploy their continuity plan. Furthermore, the advanced warning can provide the PHA with an opportunity to take several proactive measures and ensure employees are ready to act.

From an operational standpoint, PHA leadership should reinforce the roles and responsibilities of staff immediately after the disaster. In addition, it is a good opportunity to verify staff's emergency contact information is up to date, and everyone is aware of how information will be circulated (primary methods of communication and alternative options). Lastly, the PHA should explore methods to reduce the potential impacts of the disaster. For example, sandbagging prior to a tropical system.

As discussed in [Chapter I: Readiness, Section 3: Training and Communication](#), having several outlets to communicate among PIH program participants can be advantageous to quickly disburse information. As always, PHAs should be mindful of the information that is circulated and carefully distinguish between what is required, what is a good practice, and what is outside their scope of business. Some items for consideration include:

- Instructing tenants to inform the PHA of damages or displacement
- Updating contact information with the PHA
- Providing instructions for reasonable accommodations and assistance
- Sharing evacuation orders
- Sharing available local resources, assistance, and shelters
- Reminding that for emergency medical assistance, dial 9-1-1

During the disaster, PHA staff and PIH program participants' primary priority should be taking appropriate measures to safeguard their personal safety and weather the storm. Once the immediate threat has surpassed and it is safe to do so, PHA leadership should immediately begin implementing its COOP, connect with local emergency partners, circulate pertinent information to PIH program participants, and prepare to assess the PHA's portfolio.

2. Portfolio Assessment

After a disaster occurs, the PHA should take an assessment of its portfolio as its first step. This includes an assessment of business operations, PIH participants, and the public housing stock. Doing so will allow the PHA to understand the full scope of impacts. This information will then allow the PHA to prioritize items based on need and available resources.

Having prepared checklists and logs developed in the readiness phase can help expedite assessments, promote consistency, ensure all necessary items are reviewed, and establish a record retention process. Depending on the event, assessments may take a few hours but could stretch over several days. Furthermore, conditions and impacts can often evolve overtime and may require the PHA to reassess. As assessments are completed, the [local HUD Office of Public Housing](#) should be notified of any impacts and updated on a regular basis, further discussed in [Section 3: Informing HUD](#).

2.1 Business Operations

Assessments should begin with gauging the welfare and capacity of the PHA staff as it transitions into conducting other essential functions. A useful strategy often adopted is for leadership to first contact essential staff and branch out to the remaining staff to ascertain the health and safety of employees and their families. Afterwards, PHAs will have a list of staff who are capable of reporting to work, when it is deemed safe to do so, or able to work remotely and can then delegate mission-essential tasks to the available workforce. An advantageous practice to expedite this process is to maintain an accurate checklist or spreadsheet that includes, but not limited to:

- All staff and their emergency contact information
- When contact was made with the employee
- Employee's status
- Alternative/best forms of communication
- Other pertinent information the PHA deems necessary

In addition, the PHA should then assess the central office and any scattered-site offices for the operational capacity, and damages to equipment and records. A predeveloped checklist can be advantageous for the PHA to have at its disposal, which will help expedite the process, promote consistency, and ensure essential items are not overlooked. Items for consideration include, but are not limited to:

- Name and location of office
- Damages to building envelope
- Operational status of utilities
- Operational status of communication systems
- Integrity/accessibility of records (physical and electronic)
- Other pertinent information the PHA deems necessary

2.2 Program Participants

Disasters often cause widespread power and communication outages. As a result, the PHA will find it advantageous to have a variety of communication methods at its disposal to quickly disburse information to its program participants. The PHA's primary means of evaluating and recording the impacts to PIH program participants is direct updates from participants themselves. As a result, education prior to a disaster is vital to increase and spread awareness of the PIH program participant's responsibility to communicate unit damages and displacement with the PHA (see [Chapter I: Readiness, Section 3: Training and Communication](#)). Immediately after the disaster, the PHA should circulate information to PIH program participants informing them of how to report unit damages and displacements. Similar communication and outreach should be made with HCV landlords. Whereas the landlord should notify the PHA of any significant damages to the subsidized unit that would hinder it uninhabitable. The sooner the PHA is aware of the damages and/or displacement the sooner measures can be taken to address.

As information comes in, the PHA will find it useful to have predeveloped log(s) to record, track, and monitor essential data. Doing so will assist the PHAs efforts in the recovery phase to address damages and assist individuals with their rehousing efforts. PHAs should be mindful of collecting and storing personal identifiable information (PII) and take appropriate measures to avoid any security risks. Common information to collect on a spreadsheet includes, but not limited to:

- Contact information
- Program (e.g., public housing or HCV)
- Address
- Damages reported
- Evacuation status
- Displacement status
- Reasonable accommodations
- Date of last contact
- Notes

PHAs with elderly persons or persons with disabilities have found it beneficial to establish partnerships with organizations that are equipped and able to conduct resident wellness checks in the event of a disaster. As the disaster response partners conduct their outreach, they can help inform the PHA of any notable situations.

As the PHA conducts an onsite assessment of the public housing portfolio, discussed in [Section 2.3: Housing Stock](#), staff may encounter residents affected by the disaster. PHA staff should use the in-person opportunity to record the resident's pertinent information. Afterwards, the collected information should be included in the PHA's master list for continued monitoring and assistance.

Lastly, as PIH participants inform the PHA of damages to their housing, it is common that other substantial needs will be shared that are outside of the PHA's book of business and expertise (e.g., food, clothing, medical services, and locating lost family). During the readiness phase, PHAs should be aware of the emergency partners within their local community and, as a good steward, share these essential resources with PIH participants (see [Chapter I: Readiness, Section 4: Coordination and Partnerships](#)).

2.3 Housing Stock

Due to the nature of the HCV and Public Housing Programs, assessing the associated housing stock will take two different paths. PHAs should begin assessments as soon as it is safe to do so. Depending on the type and severity of the disaster, conditions and impacts can quickly evolve. As a result, the PHA may have to reassess properties.

Housing Choice Voucher Program

The primary method for PHAs to evaluate units supported by the HCV Program is under HQS, found in [24 CFR part 982.401-486](#). Specifically, HQS defines "standard housing" and establishes the minimum criteria for the health and safety of the program participants. A detailed overview of the HQS process, HQS checklist, related notices, and other associated resources can be found on HUD's [HQS website](#).

Most HQS inspections occur before the tenant establishes residency and then again biennially, as described in [Notice PIH-2016-05](#). See also [Notice PIH-2017-20](#). However, a property owner, HCV participant, agency, or third-party can request a special/compliant HQS inspection. The special/compliant HQS inspection is an important step to identify and document damages induced by the disaster and ensure the landlord mitigates any issue(s) identified within the appropriate time. In addition, the HQS inspection may determine the unit is uninhabitable. In which case, the PHA will terminate the Housing Assistance Payments (HAP) Contract and reissue a voucher for the tenant to relocate.

Since the PHA is reliant on other individuals to initiate the special/compliant HQS inspection, it is important for HCV participants to be well informed of the process. The tenant's initial examination or subsequent reexamination offers an ideal opportunity to educate participants about the special/compliant HQS process. In addition, for PHAs that have adopted emergency alert systems, newsletter distributions, social media, or other communication methods, the information can be easily and quickly circulated.

Public Housing Program

Under the PHA's ACC with HUD, the PHA is required to promptly restore, reconstruct, and/or repair any damaged or destroyed public housing property or project, unless HUD provides written approval to the contrary. To meet this requirement, the PHA should conduct a preliminary property assessment, as soon as it becomes safe to do so, to identify all items that require attention. Having a predeveloped checklist will often prove to be beneficial to expedite the process, promote consistency, and ensure all necessary items are reviewed. In addition, the PHA will often find it beneficial to photograph the property and associated impacts for future insurance claims and/or financial resources that might become available.

During the preliminary property assessment, the PHA should make note of any exigent health and safety (EH&S) issues. For clarity, EH&S issues are items that impose an immediate risk to the health and safety of residents and/or the public. As a result, the PHA should prioritize these items and mitigate within 24 hours.

Depending on the results of the preliminary property assessment, the PHA will have to determine if an in-depth PNA or similar means is required to assess the property and associated damages. A recent PNA of the property can offer a frame of reference and the condition of the property prior to the disaster. Comparing the two can help distinguish what damages were induced by the disaster, opposed to what was previous there. This information can prove to be beneficial while the PHA advocates for the maximum insurance return and/or seeks other financial assistance. Furthermore, the cost of repairs identified in PNA will determine if the PHA should submit a Section 18 Demolition/Disposition Application (DDA) to the Special Application Center (SAC), covered in [Chapter III: Recovery, Section 4.6: Demolition and Disposition](#).

When any significant damage is identified during the preliminary property assessment, the PHA should immediately contact its insurance provider. The insurance provider will then schedule an insurance adjuster to evaluate the property, identify damages, and estimate the repair or reconstruction costs. As previously indicated, an independent assessment can prove to be advantageous for the PHA to validate or dispute the insurance adjuster's assessment, if warranted.

Under the [Public Housing Assessment System \(PHAS\) Interim Rule](#), PHAs have become accustomed to the [Uniform Physical Condition Standards](#) (UPCS) and the [National Standards for Physical Inspection](#) (NSPIRE) used by the Real Estate Assessment Center (REAC) to inspect properties. The standards outlined in the UPCS and NSPIRE can be a useful starting point to identify damages caused by a disaster; however, a PHA should be aware of the limitations of these inspections. Specifically, UPCS and NSPIRE are not designed to demonstrate the costs associated with damages, repairs, and/or reconstruction, a fundamental component for insurance claims and a potential basis for applying for additional funds.

3. Informing HUD

With HUD's vested interest in the participants of PIH programs and the public housing properties through the Declaration of Trust ([HUD-52190](#)), PHAs should be prepared to communicate impacts with their local HUD field office at the earliest opportunity. For large scale events, the local HUD field office will typically reach out to the PHAs in the affected area to establish communication and verify impacts. If the emergency is localized, the nearest HUD Office of Public Housing may not be aware of the incident. PHAs are encouraged to proactively inform the local HUD field office of any emergency. HUD often issues waivers or alternative requirements during periods of national emergencies that could be helpful to the PHA (see [Chapter III: Recovery, Section 2.3: Disaster Waivers](#)).

HUD recognizes that informing the field office can take the PHA's attention away from addressing the aftermath of a disaster and supporting the needs of PIH participants. As a result, HUD will limit requests to the most essential information, such as:

- Impacts to the business operations of the PHA
- Impacts to HCV participants
 - Total currently evacuated
 - Total displaced, currently in a shelter
 - Total displaced, currently in other temporary housing

- Total displaced and successfully rehoused
- Total displaced and left the program
- Impacts to public housing participants
 - Total currently evacuated
 - Total displaced, currently in a shelter
 - Total displaced, currently in other temporary housing
 - Total displaced and successfully rehoused
 - Total displaced and left the program
- Impacts to public housing property
 - Total public housing units damaged (i.e., require capital improvements)
 - Total public housing units damaged and uninsured or underinsured
 - Total estimated cost to repair/rebuild
 - Total anticipated insurance proceeds

Immediately after a disaster, it may be difficult for the PHA to verify these elements due to a variety of constraints. In these circumstances, numbers can fluctuate over the first several days and weeks of a disaster. These are known realities in disaster response and are best addressed with frequent updates to further refine the data.

As a best practice, the PHA should establish a single point of contact to update the local HUD field office. HUD will then determine an appropriate frequency to check in, balancing the accuracy of data with the PHA's recovery efforts. The frequency will be based on the size and severity of the disaster, the change in statistics, and the time since the event. For example, a Category 5 hurricane may require daily updates for the first week. As numbers stabilize, the frequency will be reduced. The PHA will continue to inform the field office until all displaced PIH participants are rehoused and impacts to the public housing portfolio are addressed.

HUD compiles the information from individual PHAs to determine the overall impact to the PIH portfolio. This allows HUD to identify the areas with the most need and provide technical assistance and support to those PHAs. Furthermore, this information helps HUD to better understand how climate change affects the PIH portfolio and how a more resilient portfolio can be established in the future.

Chapter III: Recovery

After the immediate response phase concludes, the difficult work of recovery begins. The fundamental goal during recovery is for the PHA to identify needs, then determine the resources available to meet those needs. This involves stakeholder input and prioritizing how to move your PHA forward in a responsible, environmentally aware way. Once strategizing your recovery, you should document and formalize a Recovery Support Strategy (RSS), or equivalent, to outline how recovery is defined by your PHA. This plan should include milestones and timelines.

During the recovery phase, PHAs should consider the following fundamentals of planning discussed in this chapter:

4. Recovery Support Strategy
5. Restoring Business Operations
6. Rehousing Displaced Residents
7. Repairing Rebuilding the Public Housing Portfolio
8. Transition to Normalization

Different agencies and localities have used different terms for their recovery plans. Regardless of the title, the goal of the recovery plan is to rehouse your residents and reestablish your housing portfolio in a more resilient way. Remember that state and local emergency management officials may have additional information on resources available to assist with recovery, so activating your preestablished partnership with them is a good way to kickstart the recovery process.

1. Recovery Support Strategy

The goal of the RSS is to create a roadmap for the PHA to identify funding and, ultimately, to maximize the return on investment to ensure an equitable, sustainable recovery. The plan should detail overarching goals, timelines, and the responsible parties in each step, as well as the communication strategies to residents and other stakeholders. The plan should be tailored to the needs and impacts of each PHA. For example, for the needs of all residents, including persons with disabilities, limited English proficiency, etc.

The plan is a way to formally document the short-term (0 to 6 months), intermediate (6 to 12 months), and long-term (12 months and longer) needs of the PHA and its residents and how to combine those needs with the available resources post-disaster. These are rough timelines meant to help the PHA prioritize the recovery actions needed to reestablish the portfolio. Some activities listed in certain timeframes may be able to happen earlier or later, depending on the specifics of the disaster.

Short-Term Recovery

- Evaluate and reestablish PHA administrative operations
- Document both expenses and damages (e.g., photos, videos, and receipts) for insurance and potential FEMA PA reimbursement
- Maintain appropriate records of procurements (e.g., labor expenses and receipts from supplies)
- Identify immediate housing needs for displaced public housing and HCV residents
- Encourage PHA residents to take advantage of available individual disaster assistance programs (e.g., FEMA IA)

- Activate pre-established partnerships for immediate assistance
- Evaluate activities, capacity of, impacts on, and needs of the PHA
- Assess potential needs for technical assistance
- Identify available recovery planning and capacity resources
- Identify actions to return units to habitable condition
- Identify opportunities to increase resilience and building performance as part of the recovery
- Provide early recovery planning, community engagement, capacity building, and technical assistance to highly affected communities

Intermediate Recovery

- Develop a recovery management organization
- Build capacity for recovery management, including involving local, state, tribal, and territorial organizations to transition long-term management
- Identify recovery planning and capacity resources
- Review and update response and recovery plans
- Formalize partnerships (e.g., Memorandums of Understanding)
- Provide detailed or specific recovery planning, capacity building, and technical assistance

Long-Term Recovery

- Build capacity for recovery management, including developing local, state, tribal, and territorial organizations to transition long-term management
- Plan and design redevelopment strategies
- Identify and coordinate resources
- Implement recovery efforts
- Implement projects, grants, and financial management
- Develop, implement, and refine long-term partnerships

2. Restoring Business Operations

The business operations assessment will provide a holistic overview of the disaster’s influence on the PHA. The goal is to fully reestablish the PHA to its operational status prior to the disaster. However, the impacts and limited resources will often require the PHA to make difficult decisions and temporarily reduce operations to the most essential aspects. A well-developed COOP will assist the PHA to navigate the recovery process and prioritize resources appropriately.

2.1 Staffing

A disaster can directly affect PHA staff and hinder their ability to perform their assigned duties. If PHA leadership is displaced, there should be a preestablished hierarchy of whom will assume interim leadership responsibilities. Next, the PHA should identify available staff and their assigned duties. Depending on staff availability and capabilities, the PHA may have to temporarily move staff into different roles to address essential operations (see [Chapter 1: Readiness, Section 3: Training and Communication](#)). The upmost care should be taken to ensure temporary assignments are not overreaching to the staff’s capabilities and/or place staff in a compromising position.

Disasters can often cause a temporary influx to the PHA's workload. As a result, the PHA may have to explore temporary staffing solutions like temporary or part-time staff. Other work might best be accomplished by procuring a contract for service. Some PHAs have also successfully established a Memorandum of Agreement (MOA) with neighboring PHAs to temporarily use staff to address immediate recovery needs. This last option should be done with an abundance of caution to ensure all legal and financial elements are considered and agreed upon beforehand.

2.2 Office

Physical impacts to the PHA's office facilities can obstruct staff's ability to complete their designated assignments. During the readiness phase, PHAs should have considered all scenarios and formulated an appropriate course of action to implement in the COOP.

PHAs that have incorporated remote work business practices will frequently find themselves better positioned to continue operations. Having mobile capabilities and electronically stored documents will allow staff to continue their work while their duty station is impaired. For example, staff will be able to telework or relocate to other office locations or community space within the PHA with ease. For PHAs that do not have alternative space, prior conversations with local community partners may yield opportunities to temporarily establish an alternative location of operations (e.g., firehalls, community centers, or libraries). Neighboring PHAs may also find it beneficial to establish an MOA to allow each other to temporarily utilize space when affected by a disaster. Lastly, remote capabilities can allow staff to continue functions of their work from the safety of their home or an alternative location when evacuated. Regardless of the option implemented, PHAs should inform PIH program participants where the temporary office has been established and/or the best means of contacting the PHA.

2.3 Disaster Waivers

HUD's expedited process for waivers and flexibilities for regulatory and administrative requirements during PDDs are outlined in the Federal Register (e.g., [FR-6301-N-01](#)). PHAs located within the PDD area may request the expedited process to reduce public housing and HCV administrative requirements to assist with recovery and relief efforts.

PHAs should refer to the Federal Register for a full description of eligible HUD requirements for which PHAs can request a waiver. HUD will not approve a PDD PHA's or other recipient's request to waive or be granted a flexibility for a fair housing, civil rights, labor standards, or HUD's environmental review requirements.

Requests should be submitted in their entirety no later than 120 days following the PDD. Requests submitted after the 120 days will not be considered except in special cases outside of the PHA's control. PHAs should refer to the Federal Register for complete instructions for notification and expedited approval process for PDD PHAs.

3. Rehousing Displaced Residents

Once a PHA identifies a displaced HCV or public housing participant, the primary objective is to reestablish permanent housing for the family. With limited affordable housing options across the country, securing housing can be a difficult challenge in normal circumstances, which is often compounded further after a disaster. Consistent and frequent communication between the PHA and

displaced HCV and public housing participants is essential to navigate housing opportunities and establish permanent housing. Maintaining a log will assist the PHA to track the housing status, contact information, date of last communication, and other essential information needed to assist displaced families.

The local housing market, severity of the disaster, and other housing and economic variables will drastically influence the rehousing efforts. In some cases, the community’s overall housing portfolio can be drastically reduced and the number of individuals looking for housing can substantially increase overnight. With the housing supply and demand out of balance, permanent housing may not be physically achievable in the area for several months or years. As a result, displaced individuals will have to explore temporary housing options or consider relocation to areas with available housing.

Due to the nature of the HCV and public housing programs, there are different housing opportunities available. The following chart contains a summary, but not limited to, commonly used rehousing options for each program. Each option is further detailed below.

Program	Permanent Housing Options	Temporary Housing Options
Housing Choice Voucher	<ul style="list-style-type: none"> • Return to original unit after repairs are made and the unit passes HQS • HAP is terminated for uninhabitable unit, PHA reissues a voucher to relocate, and participant secures a new unit • Participant transfers to another PHA’s jurisdiction under portability and participant secures a unit • Participant transfers to the public housing program¹ 	<ul style="list-style-type: none"> • Community/congregate shelters • Housing options provided through FEMA IA² • Friends and family
Public Housing	<ul style="list-style-type: none"> • Return to original unit after repairs are made • Relocate to another available public housing unit • Apply to another PHA’s open public housing or HCV waitlist (expedited if the other PHA has a disaster preference) • Emergency Tenant Protection Voucher³ issued through Section 18 – Demolition Disposition • Transfer to the HCV program¹ 	<ul style="list-style-type: none"> • Community/congregate shelters • Housing assistance provided through FEMA IA² • PHA community spaces for immediate short-term needs • Hotel expenses may be covered by the Capital Fund Program and/or Capital Fund Emergency/Natural Disaster Fund (non-PDD) • Friends and family

¹ PHA must contain identified program and have appropriate language in ACOP or HCV Administrative Plan to place a participant on the associated waitlist.

² Availability dependent on disaster and county designation.

³ PHA must have voucher program to administer or partner with a neighboring PHA with a voucher program to administer on their behalf.

FEMA Individual Assistance (IA): Displaced families may be eligible for FEMA’s IA programs following a disaster, though not always available in PDD. The governor must request this type of assistance from the Federal Government, which is then issued at the county/parish level. If the request for IA is approved, a PHA’s impacted public housing residents and HCV participants may be eligible for funds to cover their uninsured personal property losses. Furthermore, if they are displaced because of damage to their home and the PHA is unable to rehouse immediately, then they may be eligible for housing assistance.

All citizens are eligible to apply for FEMA IA, when made available, including public housing and HCV participants. As such, it is the individual’s responsibility to become aware of the supportive opportunities provided through FEMA IA, complete the [FEMA IA application](#), and comply with all requirements. Public housing and HCV participants that secure temporary housing via FEMA IA should inform the PHA and stay in communication as permanent housing options are explored. Lastly, FEMA IA has a variety of eligible items that can be covered in addition to temporary housing needs that can assist survivors.

Voluntary Organizations Active in Disaster (VOAD): After a disaster, housing and shelter is only one component of a survivors needs. Fortunately, the [National VOAD](#) is an association of organizations that mitigate and alleviate the impacts of disasters; provide a forum promoting cooperation, communication, coordination, and collaboration; and foster more effective delivery of services to communities affected by a disaster. VOAD assists with a wide range of activities for survivors that range from emotional/spiritual care, family reunification, meal assistance, debris removal, and more. With many of these services falling outside the scope of the PHA, it can be a great opportunity to spread awareness of these available resources among the PHA’s supported participants.

3.1 Temporary Housing Options

Often, permanent rehousing can take substantial time to secure, and suitable temporary housing options must be explored. The following options are commonly used, but not limited to, by displaced residents to establish temporary housing.

Due to the nature of the programs, some options are suitable for public housing residents (identified by the green PH icon) and some options are suitable for HCV recipients (identified by the yellow HCV icon).

Option 1: Community Shelters/Congregate Housing

Post disaster, a frequent housing resource to quickly meet the temporary needs of the area is the establishment of community shelters and congregate housing. In addition to having a safe place to sleep, many shelters offer additional services to the survivors (e.g., food/water, health services, emotional support, and help connecting with loved ones). A leading resource for survivors to easily locate these housing options are the American Red Cross’s [Find Open Shelters website](#) and Salvation Army’s [Provide Shelter website](#).

Option 2: FEMA – Individual Assistance

When FEMA IA is made available to a county or parish, FEMA’s Individuals and Household Program (IHP) provides financial and direct services to eligible individuals and households affected by a disaster, who have uninsured or under-insured necessary expenses and serious needs. [IHP housing assistance](#) may include:

- **Rental Assistance:** Financial assistance may be available for eligible survivors who need a place to temporarily live while their home is repaired, or until they secure permanent housing.
- **Transitional Sheltering Assistance (TSA):** If approved for the disaster, FEMA may provide temporary sheltering using participating hotels for eligible disaster survivors. TSA is intended to reduce the number of disaster survivors in shelters by transitioning survivors into short-term accommodations.
- **Home Repair/Replacement:** Financial assistance may be available for eligible homeowners to rebuild or make basic repairs, so their home is safe, sanitary, and functional.
- **Direct Temporary Housing:** This type of assistance provides temporary use of FEMA-issued temporary transportable housing units to eligible survivors.

In addition to HCV participants utilizing FEMA IA housing resources, HCV participating landlords can utilize these resources to assist with repairs and replacements to restore the housing portfolio. Public housing participants, HCV participants, and landlords interested in applying should visit [DisasterAssistance.gov](https://www.DisasterAssistance.gov) to begin the application process.

Option 3: PHA Community Space

PHAs equipped with a community space may deem it necessary to utilize the area as an immediate shelter resource for evacuated or displaced participants. The community space should only be used until more suitable temporary housing options become available to meet the needs of the survivors.

Option 4: Hotel Expenses via Capital Fund Program

In non-PDD emergencies, relocation and the cost to provide temporary housing to public housing participants until their units can be repaired are eligible expenses covered by the PHA's annual CFP (e.g., hotel costs, moving van rental, temporary storage, and boxes). The same expenses can be covered under the [Capital Fund Emergency/Natural Disaster Fund](#) upon the PHA's application and award. If a PDD is issued for the PHA's county or parish, CFP cannot be used. A full description of eligible expenses can be found in the [Capital Fund Guidebook](#).

Option 5: Friends and Family

One of the most common temporary housing resources used by any survivor is assistances offered by their friends and family who act as a support group. Many survivors find it preferable to stay with loved ones instead of seeking refuge in community shelters or other temporary method. However, not all survivors have an available support group to rely on or a support group that can provide temporary housing assistance.

Option 6: Local Resources

Disasters frequently bring out the best in communities and unite the area under one cause. As such, communities will often have unique local resources, often developed by faith based and/or nonprofit organizations, that survivors can utilize and may include temporary housing resources.

3.2 Permanent Housing Options

The PHA should maintain consistent communication with displaced HUD residents until they secure permanent housing or leave the program. The following options are commonly used, but not limited to, by displaced residents to establish permanent housing.

Due to the nature of the programs, some options are suitable for public housing residents (identified by the green PH icon) and some options are suitable for HCV recipients (identified by the yellow HCV icon).

Option 1: Return to Original Unit

The ideal housing solution is for a participant to return to their original unit. This is often achievable if the tenant was displaced for only a short period of time while repairs were made. For public housing, HQS inspection is a vital component to ensure the unit is once again ready for habitation.

Option 2: Voucher to Relocate

If an HCV participant's unit is no longer habitable, the PHA should terminate the HAP with the landlord and reissue a voucher to the program participant. The participant will then follow the same housing search and leasing process as they originally did when first entering the program, outlined in the Housing Search and Leasing chapter of [The Housing Choice Voucher Program Guidebook](#).

With the housing supply and demand altered, participants will often find it more difficult to locate and secure housing. As such, the participant may require additional search time than what is customary. At its discretion, the PHA may grant extensions of search time and determine the length of an extension and the circumstances under which extensions will be granted. There is no limit on the number of extensions that the PHA can approve. Discretionary policies related to extension of search time must be described in the PHA's administrative plan, including a description of how the PHA determines whether to grant extensions, and how the PHA determines the length of any extension.

PHAs may accelerate lease-up with the alternative HQS inspection processes under [Notice PIH-2017-20](#). The first option allows a PHA to approve the assisted tenancy and make HAP contracts on a unit that fails to meet HQS, provided the unit does not have life-threatening deficiencies. The second option allows the PHA to approve assisted tenancy of a unit prior to HQS inspection if the property passed an alternative inspection within the past 24 months. These alternative inspection policies may help families secure units more quickly.

Furthermore, the shock of the housing supply and demand will often raise the cost of rent in the impacted and surrounding area. As a result, participants searching for a unit may find it difficult to locate a unit within the designated FMR for the area. To address this issue of private market demand, HUD has a regulation found at [24 CFR 982.503c](#) that permits PHAs to request exceptional payment standards (EPS) outside the basic FMR range. Using HUD's [Methodology for Determining Emergency Exception Payment Standard](#), an EPS of up to 150% of FMR can be applied.

Option 3: Portability

Displaced HCV participants may find it difficult to utilize their reissued voucher in the local community despite additional search time and applied EPS. As a result, participants may have to consider relocating to an area that contains more housing options until the local housing portfolio is restored. Portability in the HCV program refers to the process through which the participant can transfer or "port" their rental subsidy when they move to a location outside the jurisdiction of the PHA that first issued the voucher when they were selected for the program.

A detailed description of the portability process can be found in the Moves and Portability chapter of [The Housing Choice Voucher Program Guidebook](#). Additional reference material can be found on HUD's [HCV Portability website](#).

Option 4: Relocate to Another Public Housing Unit

If the extent of repairs to a family's unit will require significant time to complete, then the PHA should consider whether it may need to move the family to another available and appropriately sized public housing unit. Moving the family to another public housing unit can meet the families permanent housing needs, but they should be awarded the opportunity to return once repairs are complete.

Option 5: Relocate to Another PHA

The overall restoration of the public housing portfolio may require significant time to complete. To meet the housing needs of the displaced public housing participant, they may wish to relocate to another PHA's jurisdiction with an available housing portfolio. When pursuing this option, the PHA's same application process is in effect.

First and foremost, the PHA must have an open waitlist for the displaced public housing participant to apply, which can often take substantial time to rise to the top. If the PHA has a disaster preference, then the displaced public housing participant can be elevated on waitlist, as outlined in [Chapter I: Readiness, Section 2.1: PHA Policies](#). Note that a disaster preference does not guarantee the displaced public housing participant will be next on the waitlist or even close to the top. As the survivor applies to the waitlist, they should ask questions to gain a realistic expectation of how long the process may take to secure permanent housing.

Option 6: Emergency Tenant Protection Vouchers

Tenant protection vouchers (TPVs) are provided to protect HUD-assisted families from hardship as the result of a variety of actions that occur in the public housing portfolio. TPVs are administered the same way as the rest of the PHA's HCV program, including the flexibility to port to another PHA's jurisdiction. If the PHA does not have an HCV program, then TPVs cannot be issued. However, a neighboring PHA with an HCV program can administer the TPVs on behalf of the affected PHA.

To acquire emergency TPVs, the PHA must go through an expedited application process. First, the PHA should contact their local HUD field office and the Special Applications Center (SAC) to verify it meets Section 18 demolition and/or disposition requirements, including an imminent health and safety threat to public housing occupants and, for demolition, an obsolescence test. Second, the PHA will then be required to submit a Section 18 demolition/disposition application to the SAC. As the final step, the PHA must submit form [HUD-52515 TPV Application](#) to the local HUD field office. HUD's Housing Voucher Financial Management Division (FMD) will then work with the local HUD field office to expedite the TPV request (typical turn around is 5 to 10 business days).

If the PHA did not originally apply for emergency TPVs but applies for a Section 18 demolition/disposition, then the PHA may apply for TPVs after SAC approval. Additional information and resources can be found on HUD's [Tenant Protection Voucher website](#) and [Demolition/Disposition website](#).

Option 7: Transfer to the Housing Choice Voucher Portfolio

For this option, the PHA must first have an HCV portfolio. Second, the PHA must have the process and parameters fully defined and adopted in its policies (i.e., ACOP, HCV Administrative Plan, and Annual Plan). PHAs that have not formulated language to transfer an individual from the public housing program to the HCV program can always do so; however, formal adoption can take substantial time to incorporate and is best done prior to a disaster. Displaced participants will be placed on the HCV waitlist.

Once a voucher is issued, they will then follow the PHA's procedures to locate and secure a unit. If the participant would like to return to the public housing program, they would need to formally apply to be placed on the waitlist.

Option 8: Transfer to the Public Housing Portfolio

HCV

For this option, the PHA must first have a public housing portfolio. Second, the PHA must have the process and parameters fully defined and adopted in its policies (i.e., ACOP, HCV administrative plan, and PHA Plan). PHAs that have not formulated language to transfer an individual from the HCV program to the public housing program can always do so; however, formal adoption can take substantial time to incorporate and is best done prior to a disaster. Displaced participants will be placed on the public housing waitlist. Once a unit is available, they will then follow the PHA's procedures to be rehoused. If the participant would like to return to the HCV program, they would need to formally apply to be placed on the waitlist.

4. Repairing and Rebuilding the Public Housing Portfolio

Damages from a disaster will range from routine maintenance to full replacement. Regardless of the level of damage, a PHA is required to promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project except with written approval of HUD to the contrary, as outlined in the PHA's ACC. Thus, when a public housing property has been damaged by a disaster, the PHA should immediately proceed to develop a plan for the damaged project. In developing a plan, the PHA should consider:

- Extent of damage (complete or partial loss) to the units
- Funding available for repair or replacement
- Local construction market
- Impacted accessible units or otherwise contained accessible features
- PHA's future plans for the public housing property (e.g., repositioning and demolition/disposition)

As specified in [Notice PIH-2016-13](#), HUD suggests that PHAs reach out to their appropriate HUD field office as soon as possible after the damage with a plan for repairing, rebuilding, demolishing, disposing, converting, or replacing the damaged public housing property. The HUD field office will then assist the PHA in determining what other HUD approvals, if any, are necessary to achieve that plan.

As the PHA reviews the property assessment, damages will often naturally be segmented into items that require immediate attention, covered in [Section 4.1: Emergency Work](#), and those that what will require a long-term restoration strategy, covered in [Section 4.7: Redevelopment and Repositioning](#).

4.1 Emergency Work

After the PHA completes the initial damage assessment to the public housing portfolio, the damages should be classified into two categories: items that impose an EH&S issue to residents and/or the public, and those that do not. The PHA should then prioritize the mitigation of the EH&S issue before other activities.

Before work begins, the PHA must consider the procurement and environmental review requirements. In some cases, the PHA may already have completed procurement and an environmental review that

covers the work required to address the EH&S. As such, the PHA can be processed with the mitigation efforts. If procurement has not occurred and/or the scope of work is not included in an active environmental review, then the PHA should explore opportunities to expedite, outlined below. Failure to adhere to procurement and environmental review regulations can result in, but not limited to, the recapture of funds, corrective action plans, and additional oversight.

Emergency Procurement

PHAs must comply with their established procurement policy and adhere to procurement regulations outlined in [2 CFR 200.317-327](#) in all instances. As discussed in [Chapter I: Readiness, Section 2: Internal Policies and Resources](#), a close familiarity with procurement policy can assist a PHA to efficiently navigate the procurement process and prevent blunders that lead to delays. In the event a PHA cannot timely or efficiently address a public exigency or emergency through its designated procurement methods, then the PHA can conduct a non-competitive proposal as described in the procurement regulations.

When utilizing the non-competitive proposal, the PHA can only include the work necessary to mitigate the exigency or imminent threat to public safety. For example, a wind shear hits a housing project consisting of 100 public housing units and damages most roofs. Immediately securing the damaged roofs would cost \$30,000 and completing long-term repairs would cost \$150,000. The PHA would be justified to secure the roofs for \$30,000 without competition or using small purchase procedures and afterwards, in a timely manner, conduct a formal invitation for bids for the long-term repairs.

Many of the award processes for non-competitive proposals are the same as for competitive ones. The PHA must evaluate the one firm for responsiveness and responsibility. If the work would typically be classified as a Request for Qualifications (i.e., for architect and engineering work), the cost is negotiated. Lastly, the cost and price analysis are still required for a non-competitive proposal, and the price must be justified as fair and reasonable.

If the aggregated value for a non-competitive proposal is greater than \$250,000, then PHAs are required to follow [2 CFR 22.320\(c\)](#), which has the option of requesting HUD prior approval. However, the PHA may also qualify for the PHA's self-certification option under [2 CFR 200.325](#).

During the non-competitive proposal process, the PHA must clearly document the justification for awarding a sole-source contract and must indicate the necessity and the circumstances of the procurement. All associated documentation must be in the contract file and include the following:

- Description of the need for a non-competitive procurement
- History of prior procurement of the same type of item or service and whether they were competitive or non-competitive
- Specific exception applied from [2 CFR 200.320\(c\)\(1\)](#)
 - The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold ([2 CFR 200.320\(a\)\(1\)](#))
 - The item is only available from a single source
 - Public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation
 - The federal awarding agency or pass-through entity expressly authorizes a non-competitive award in response from the PHA
 - After solicitation of a number of sources, competition is determined inadequate

- Unique circumstance that required the sole source
- Efforts to find other sources, including advertisements and outreach
- Statement as to what the PHA will do in the future to encourage more competition
- Signature of the contracting officer and any higher PHA official as required by PHA policy

Emergency Environmental Review

PHAs are required to have an environmental review for all activities at project site(s) assisted or to be assisted by HUD and to the use of all HUD and other federal funds, including Operating Funds, under [24 CFR part 50](#) and [58](#) and in compliance with the [National Environmental Policy Act of 1969](#) (NEPA) and other related laws and authorities. Additional guidance is further described in [Notice PIH-2016-22](#) and substantial resources are located on the [HUD Exchange Environmental Review website](#). While responding to a disaster, it is important to note that all NEPA-related laws and authorities remain applicable; however, there are options available that will help the PHA expedite the environmental review process and allow for prompt repairs or restoration to the supported housing portfolio. These options include:

Option 1: Utilize an Existing Approved Environmental Review

As outlined in [Notice PIH-2016-22](#), environmental reviews are valid for a five-year period. If the repairs required to address the damages are included in an existing project scope and the environmental conditions have not changed, then the existing environmental review will continue to satisfy the environmental review requirement.

Option 2: Work Items are Included the Part 50 Programmatic Determination

HUD has made a programmatic determination under part 50 that includes several operating activities, which are not subject to further environmental review. A full list of the activities can be found in Appendix A: Part 50 Programmatic Determination of [Notice PIH-2016-22](#).

Option 3: Mitigate Imminent Threats to Public Safety

Environmental regulations at [24 CFR 58.34\(a\)\(10\)](#) allow for an expedited review for improvements related to disasters and imminent threats. Specifically, “temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety” are exempt activities. PHAs still do not have the authority to determine if the exemption is appropriate and must receive formal written clearance before obligating funds.

Option 4: PHA Requests an Expedited Part 50 Review

The impacts of a large disaster can be felt across an entire community and region. As a result, a PHA’s responsible entity (RE) may be directly affected and unable to perform its duties under [24 CFR part 58](#). To accommodate for these circumstances, PHAs may request a part 50 Review from their local HUD field office, and HUD will expedite reviews related to emergency work items.

Option 5: Economic Growth Act Exemption

Designated small and rural PHAs can use exemptions outlined in the [Economic Growth, Regulatory Relief, and Consumer Protection Act: Initial Guidance on Property Inspection and Environmental](#)

[Reviews \(85 FR 11381\)](#). Specifically, providing an exemption from environmental review requirements for development and modernization projects that have a total cost of not more than \$100,000. The [Economic Growth, Regulatory Relief, and Consumer Protection Act](#) defines small PHAs as those that administer 550 or fewer combined public housing units and vouchers and predominantly operate in a rural area, as described in [12 CFR 1026.35\(b\)\(2\)\(iv\)\(A\)](#).

Option 6: Shortened Public Comment Period

If funds are needed on an emergency basis and adherence to separate comment periods would prevent the giving of assistance during a PDD, or during a local emergency that has been declared by the chief elected official of the RE who has proclaimed that there is an immediate need for public action to protect the public safety, the combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOI/RROF) may be disseminated and/or published simultaneously with the submission of the RROF. The combined Notice of FONSI and NOI/RROF shall state that the funds are needed on an emergency basis due to a declared disaster and that the comment periods have been combined. The notice shall also invite commenters to submit their comments to both HUD and the RE to ensure these comments will receive full consideration per [24 CFR 58.33\(b\)](#).

4.2 Utilities

During the initial damage assessment, the PHA should make note of affected utilities (i.e., electric, water, sewer, and gas). Afterward, contact the appropriate utility company to inform them of the impacts and gauge when utilities will be restored.

Depending on the estimated duration of the utility outages, the PHA may want to explore alternative resources to address the needs of residents. This will require the PHA to distinguish between items that can be internally addressed and when community partners are better equipped to meet the need of residents. For example, the PHA must decide if it has the resources to install generators to meet residents' heating needs or if temporary shelters are a more suitable resource.

Lastly, the responsibility of the utility infrastructure can often be complex and vary from city to city and property to property. For example, water and gas lines can have varying points at which the PHA and utility company are responsible. In some cases, the transition point will be at the branch for the entire project and in other cases it will carry up to the building. To efficiently address and appropriately delegate, PHAs should be aware of when their responsibilities to address utility needs begins and ends. Areas that fall under the PHA's responsibility should be promptly repaired or restored, as outlined in the PHA's ACC.

4.3 Unit Subcategory IMS/PIC

Disasters often inflict substantial damages to public housing units that can result in the unit becoming unsuitable for occupancy. Placing these units in vacant status in the Inventory Management System/PIH Information Center (IMS/PIC) will affect the PHA's Operating Fund, public housing occupancy, and continue to be subject to a physical inspection under PHAS. Fortunately, [Notice PIH-2021-35](#) outlines several unit sub-categories the PHA can request for HUD approval, assuming all conditions and requirements are met, that will reduce some of the administrative impacts. In the aftermath of a disaster, the PHA will often find the Natural Disaster and Casualty Loss sub-categories to be the most applicable to its need.

The PHA should be aware of the timeframes outlined in [Notice PIH-2021-35](#) to ensure that they can receive the maximum benefit. Specifically, the PHA is required to submit a formal request to HUD within 30 days of the requested effective date. Upon HUD approval, the PHA is required to update IMS/PIC within 60 days of the approved effective date. The PHA's local HUD field office is available for any additional questions or technical assistance.

Natural Disaster

The Natural Disaster sub-category, per [24 CFR 990.145\(b\)\(2\)](#), is for units that are vacant and uninhabitable due to a presidentially declared, state-declared, or other declared disaster. This subcategory is applicable for all units that are vacant due to any type of declared disaster, including disasters that are not caused by natural occurrences. Units designated in the Natural Disaster subcategory are eligible to receive full Operating Fund; are excluded from the Management Assessment Subsystem (MASS) public housing occupancy metric; and excluded from REAC inspections. A full description of the requirements and supporting documentation for the Natural Disaster subcategory can be found in [Notice PIH-2021-35](#) under Section 5.4.3(c): Natural Disaster.

Casualty Loss

The Casualty Loss subcategory, pursuant to [24 CFR 990.145\(b\)\(3\)](#), is for damaged and uninhabitable units that remain vacant due to delays in settling insurance claims. Provided the PHA timely submitted insurance documentation and the insurance company did not settle the claim in a timely manner, the Casualty Loss subcategory covers the period between the date a unit becomes uninhabitable due to the casualty until the date the claim is settled. Units designated in the Casualty Loss subcategory are eligible to receive the full Operating Fund and are excluded from the MASS public housing occupancy metric. A full description of the requirements and supporting documentation for the Natural Disaster subcategory can be found in [Notice PIH-2021-35](#) under Section 5.4.3d: Casualty Loss.

4.4 Rescheduling REAC Inspections

To verify a PHA is maintaining a decent, safe, and sanitary public housing portfolio in good repair, REAC conducts inspections of each AMP every one to three years in accordance with the [PHAS Interim Rule](#) and [24 CFR 902 Subpart B – Physical Condition Indicator](#). Severe weather and catastrophic events, however, could affect the ability for the inspection to occur and/or directly affect the physical condition of the property. To address, PHAs have four options at their disposal depending on the type and magnitude of the event.

Option 1: PHA Notifies the Inspector of Inclement Weather or State of Emergency, and Reschedules Inspection

Inspections are postponed within the notification window to accommodate inclement weather or catastrophic event. Incidents may be known well in advance like a hurricane or may have little to no warning like a tornado or flashflood. In these circumstances, the PHA can work directly with the inspector to postpone and reschedule the inspection when the weather or circumstance first permits and within the notification window. This step is vital to ensure the safety of PHA staff and the inspector.

Option 2: PHA Requests Damaged and Uninhabitable Units to be Designated with the Natural Disaster Subcategory in IMS/PIC

Inspections go forth, but units that are vacant and uninhabitable due to a MDD, state-declared, or other declared disaster are designated with the Natural Disaster unit subcategory in IMS/PIC, in accordance with [Notice PIH-2021-35](#) and [24 CFR 990.145\(b\)\(2\)](#). Properly designating unit subcategories will exclude these units from the sample of units for inspection and prevent the damaged units from adversely affecting the AMP's score. Furthermore, the PHA will receive a financial incentive in operating subsidy and an increase in public housing occupancy by utilizing the Natural Disaster subcategory.

Option 3: PHA Requests a Database Adjustment (DBA) Post-Inspection

Inspection proceeds as planned, but the PHA can reclaim lost points due to the incident. Damages and impacts from inclement weather often do not warrant an inspection to be rescheduled but can include impacts that could adversely affect the AMP's score. In these circumstances, the PHA can request a DBA based on adverse conditions beyond the owner's control. The PHA must request the DBA from the local PIH field office within 45 days of the physical inspection. The local PIH field office will review and forward its recommendation to REAC Technical Assistance Center. Additional guidance and examples can be found on HUD's [Technical Reviews and Database Adjustments website](#).

Option 4: PHA Requests to Reschedule the Inspection with HUD

For events in a non-MDD, requests to reschedule an inspection outside of the notification window, such as for any circumstances which may significantly affect the execution of an inspection or inspection results (e.g., major renovations, significant rehabilitation, or fire) must be submitted by the PHA and approved by HUD prior to the proposed date of inspection, as described in [Notice PIH-2019-02](#). Requests should be submitted to the local HUD field office for review, and its recommendation will then be submitted to REAC.

4.5 Funding Sources

The PHA's ability to promptly address the repairs and restoration of damaged public housing property is often reliant on the availability and ease of access to funding resources. Familiarity with common revenue streams will assist the PHA to quickly identify resources and expedite the application process where applicable. Outside the PHA's annual revenue streams, there are several other resources that become available at varying thresholds. Knowing if and when funds become available can be monumental in the recovery efforts.

A vast majority of the common revenue streams will require the PHA to apply and follow strict requirements to receive funds or reimbursement. As such, it is the PHA's responsibility to fully familiarize itself with the requirements and fulfill its obligations. Failure to do so can jeopardize the PHA's reimbursement. In general, the following are a few common principles, but not limited to, that will assist the PHA and avoid common pitfalls:

- Document and photograph conditions immediately after a disaster
- Maintain a detailed log of all expenditures inflicted by the disaster
- Retain and record all associated receipts
- Accurately log staff's time and duties associated with the response and recovery efforts
- Record all related procurement

- Ensure all related work is included in an environmental review record
- Distinguish all materials, time, and associated costs between:
 - Debris removal
 - Emergency protective measures
 - Permanent restoration

These principles are good habits to adopt for all disasters, regardless of how small at the time. In some cases, financial resources will not become available until months after the event. Proper record retention will be a major contributing factor if the PHA can successfully access those funds.

Furthermore, PHAs should be aware that the availability of one financial resource may prevent the use of another. Specifically, as it pertains to the prevention of duplication of benefits, as outlined in [44 CFR 206.191](#) and Section 312 Duplication of Benefits of the [Stafford Act](#). This means that once the PHA receives funding related to a disaster impact from one source, another source of funds cannot also be provided for that specific impact. For example, if a PHA utilizes its Capital Fund to cover repair costs, then the PHA will not be eligible for reimbursement from FEMA PA. As result, PHAs should be mindful of what financial streams are utilized to avoid depleting their annual financial resources, when possible.

The following list includes, but is not limited to, financial resources the PHA may be able to use for the repairs and restoration of the damaged public housing portfolio. Some funds may only be available in certain situations and/or require an application from the PHA. As the list only contains a summary of the financial resources, a PHA should conduct due diligence to thoroughly understand the eligibility, requirements, and administration of each funding source.

Insurance: A PHA’s primary resource to address the repairs and restoration of an impacted public housing property from a disaster will always be insurance. Under the PHA’s ACC, the PHA is required to have adequate insurance that will promptly repair and/or restore damaged or destroyed public housing units, further requirements covered in [Chapter I: Readiness, Section 2.4: Insurance](#).

Before other resources are utilized or applied for, the PHA will often be required to demonstrate the insurance proceeds and any funding gaps. As a result, PHAs should immediately process insurance claims after a disaster to initiate the process to address the impacts and apply for additional resources.

Operating Fund Program: PHAs may use Operating Funds for emergency work due to unforeseeable and unpreventable emergencies that include damage to the physical structure of the PHA’s housing stock. Although damages caused by unforeseen emergencies may eventually be covered with insurance proceeds, or through disaster funds, PHAs may use Operating Funds to cover the expenses incurred prior to receipt of insurance or disaster proceeds. PHAs must reimburse their operating account for any expenses that were initially covered with Operating Funds. PHAs must use insurance or disaster proceeds to reimburse their operating account up to the amount received. Additional guidance can be found in [Notice PIH-2016-13](#).

Capital Fund Program: For non-PDD, the costs of repairing or rebuilding public housing projects due to damage or destruction caused by casualties, emergencies, or natural disasters are eligible Capital Fund expenses. These costs may eventually be covered with insurance proceeds, or, if approved by HUD, in a separate grant from the annual appropriations set-aside funds for emergency and natural disasters. PHAs are not required to use amounts from insurance proceeds or emergency and disaster funds to repay the Capital Fund for eligible Capital Fund expenditures related to casualties, emergencies, or natural disasters. Additional guidance can be found in [Notice PIH-2016-13](#) and in the [Capital Fund Guidebook](#).

Capital Fund Emergency and Natural Disaster Fund: Each year Congress sets aside funds within the Capital Fund appropriation to create a reserve for emergencies and non-PDD natural disasters. PHAs that confront an emergency or a non-PDD natural disaster are eligible to apply for and receive funds from the reserve if they comply with the established requirements, outlined on HUD’s [Emergencies and Non-Presidentially Declared Disasters – Submission Checklist](#).

Funds are issued on a first-come, first-serve basis each year and are often exhausted quickly. As a result, applications should be quickly submitted to the PHA’s local HUD field office for review. The local HUD field office will then submit a recommendation to HUD Headquarters for underwriting. Additional guidance can be found in Chapter 8 of the [Capital Fund Guidebook](#) and HUD’s [Capital Fund Emergency/Natural Disaster Funding website](#).

Additionally, PHAs should be aware that if they have large Operating Fund reserves, Operating Fund, or Capital Fund balances that are unobligated, they may be required to use those funds prior to receiving an Emergency or Non-Presidentially Declared Natural Disaster grant.

FEMA PA: Following an MDD, the FEMA PA Program assists state, local, and territorial governments, and certain types of private nonprofit organizations. Under Section 310 of the [Stafford Act](#), priority and immediate consideration shall be given to certain applications for public facility and public housing assistance. As such, PHAs are eligible to receive FEMA PA financial assistance to cover debris removal, emergency protective measures, and the restoration and mitigation of disaster-damaged facilities.

FEMA PA is further broken into seven categories with specific focus. Of these categories, three apply to PHAs: Category A - Debris Removal, Category B - Emergency Protective Measures, and Category E - Public Buildings and Contents. The specific types of assistance will vary by disaster event and can expand over time. As such, FEMA PA may not become available until a few months following the event. Therefore, PHAs should check FEMA’s [Declared Disasters website](#) regularly for updates.

FEMA PA has specific application and reporting requirements that must be closely followed. Failure to comply can jeopardize the PHA’s ability to receive reimbursement. Detailed information on the FEMA PA program and the associated requirements can be found in the [Public Assistance Program and Policy Guide](#). Furthermore, FEMA developed the [Public Housing Agency: Applying for FEMA Public Assistance Factsheet](#) to help PHAs navigate the FEMA PA process and avoid common pitfalls. Additional questions should be directed to state emergency managers for assistance.

Community Development Block Grant – Disaster Recovery (CDBG-DR): In response to extraordinary impacts from disasters, Congress sometimes appropriates additional funding to the Community Development Block Grant (CDBG) program. Unlike FEMA recovery assistance programs, CDBG-DR assistance is not permanently authorized. If Congress appropriates disaster specific CDBG-DR funding, HUD typically allocates those funds to states given their capacity to administer funds across damaged areas but can also allocate funds to local governments and Indian tribes.

CDBG-DR is a robust grant that covers a wide variety of opportunities in the community, including the rehabilitation of disaster-affected public housing. [24 CFR 570.202\(a\)\(2\)](#) allows the rehabilitation of “low-income public housing and other publicly owned residential buildings and improvements.” Thus, public housing damaged or destroyed by a disaster may receive CDBG-DR assistance that is necessary and reasonable to serve unmet needs. In addition, new public housing complexes can be funded if:

1. HUD has granted the waiver allowing new construction,
2. CDBG eligibility and national objective criteria are met,

3. Construction is tied to a disaster-related impact, and
4. The project is approved by PIH.

Furthermore, CDBG-DR funds may be used to modernize public housing so long as the modernization addresses a disaster-related impact (e.g., as part of a project to rehabilitate public housing damaged by the storm).

When CDBG-DR is awarded to the state or local CDBG grantee in the PHA's jurisdiction, the PHA should establish communication with the grantee to ensure the grantee is aware of the PHA's unmet needs as the CDBG-DR Action Plan is developed. CDBG-DR requirements typically require states and local governments that receive CDBG-DR funds to consult with PHAs to describe unmet public housing needs caused by the disaster and to coordinate with local PHAs in the areas most impacted and distressed by the disaster to ensure that the grantee's representation in the action plan reflects the input of those entities. If funds are set aside for disaster-related needs of a PHA, the PHA may request technical assistance from the CDBG-DR grantee on how to administer a subgrant or otherwise comply with requirements on the use of the funds. The PHA should carefully review the CDBG-DR Action Plan during the public comment period to verify that their needs have been considered. Additional guidance and information can be found on HUD's [Community Development Block Grant Disaster Recovery Program website](#).

State/Local Funds: Individual states and localities may have unique funding resources that may aid in the recovery efforts of the PHA. It is the PHA's responsibility to research possible funding resources, the application process, and funding requirements.

Voluntary Organizations Active in Disaster (VOAD): The [National VOAD](#) is an association of organizations that mitigate and alleviate the impacts of disasters; provide a forum promoting cooperation, communication, coordination and collaboration; and foster more effective delivery of services to communities affected by a disaster. VOADs assist with a wide range of activities, including debris removal, mold mitigation, and other physical restoration opportunities.

4.6 Demolition and Disposition

Depending on the extent of damage inflicted on a public housing property, demolition and disposition may be authorized under [Section 18 of the Housing Act of 1937](#) and implemented under [24 CFR part 970](#). In instances where a public housing building is completely destroyed by a disaster, a demolition/disposition application (DDA) will be obvious. Other instances will require further analysis to determine if repairs are not cost-effective to restore the property.

Specifically, [24 CFR 970.5](#) defines demolition as the removal by razing or other means, in whole or in part, of one or more permanent buildings of a public housing project. A demolition involves any four or more of the following:

- Envelope removal (roof, windows, exterior walls)
- Kitchen removal
- Bathroom removal
- Electrical system removal (unit service panels and distribution circuits)
- Plumbing system removal (i.e., the hot water heater and/or distribution piping in the unit)

Furthermore, PHAs should conduct an obsolescence test to determine if the necessary modifications and/or rehabilitation to the public housing property is cost effective. HUD generally considers modification not to be cost-effective if costs exceed 62.5% of the Total Development Cost (TDC) for elevator structures and 57.14% for other types of structures. As discussed in [Chapter II: Response, Section 2.3: Housing Stock](#), a PNA is an instrumental tool to evaluate the impacts and associated costs, which can be used to determine if costs surpass TDC. Other methods to demonstrate obsolescence include the insurance adjuster claim instead of a PNA or pictures that clearly depict at least four of the items outlined in [24 CFR 970.5](#).

Further demolition and/or disposition instructions can be found in [Notice PIH-2021-07](#). In addition, HUD's [Demolition/Disposition website](#) contains a variety of resources, including the [Section 18 application checklist](#), access to the annual TDC limits, and training materials. Lastly, demolition/disposition can be used as a mechanism to secure TPVs and permanently rehouse displaced tenants, as discussed in [Section 3: Displaced Public Housing Participants](#).

4.7 Redevelopment and Repositioning

When public housing properties are no longer cost effective to repair and/or located in a high-risk area that is no longer conducive for residential purposes, the PHA should consider redevelopment or repositioning opportunities. Both options typically take significant planning to secure funds, designs, approvals, and many more elements to make a reality. As such, HUD suggests PHAs reach out to their HUD field office as soon as possible with their plans. The HUD field office will then assist the PHA to navigate the process.

Redevelopment

PHAs interested in returning units to the public housing portfolio and placing them under an ACC will have to follow [24 CFR 905 Subpart F – Development Requirements](#). Through this process, PHAs have five primary development options, outlined in [24 CFR 905.600](#), which include:

1. **Conventional:** The PHA designs a project on a property it owns. The PHA then competitively selects an entity to build or rehabilitate the project.
2. **Turnkey:** The PHA advertises for and competitively selects a developer who will develop public housing units on a site owned or to be owned by the developer. Following HUD approval of the development proposal, the PHA and the developer execute a contract of sale and the developer builds the project. Once the project is complete, the developer sells it to the PHA.
3. **Acquisition with or without rehabilitation:** The PHA acquires an existing property that requires substantial, moderate, or no repair. Any repair work is done by PHA staff or contracted out by the PHA. The PHA must certify the property was not constructed with the intent of selling it to the PHA or, alternatively, the PHA must certify that HUD requirements were followed in the development of the property.
4. **PHA use of force account labor:** The PHA uses staff to carry out new construction or rehabilitation, as provided in [24 CFR 905.600\(b\)\(4\)](#) and [24 CFR 905.314\(j\)](#).
5. **Mixed finance:** Development or modernization of public housing units where the public housing units are owned in whole or in part by an entity other than a PHA, pursuant to [24 CFR 905.604](#).

Once a PHA determines the method of development, the PHA or its partner and/or the owner entity will prepare a site acquisition proposal and/or a development proposal pursuant to [24 CFR 905.608](#) and [24 CFR 905.608](#) for submission to HUD.

The site acquisition proposal should include:

1. **Justification:** Reason for acquiring property prior to development proposal submission and approval.
2. **Description:** A description of the property to be acquired.
3. **Project description, site, and neighborhood standards:** An identification and description of the proposed project, site plan, and neighborhood, together with the information sufficient to enable HUD to determine that the proposed site meets the site and neighborhood standards at [24 CFR 905.602\(d\)](#).
4. **Zoning:** Documentation that the proposed project is permitted by current zoning ordinances or regulations, or evidence to indicate that needed rezoning is likely and will not delay the project.
5. **Appraisal:** Documentation attesting that an appraisal of the proposed property by an independent, state certified appraiser has been conducted and that the acquisition complies with [24 CFR 905.308\(b\)\(9\)](#) and [24 CFR 905.608\(f\)](#). The purchase price of the site/property may not exceed the appraised value with HUD approval.
6. **Schedule:** A schedule of the activities to be conducted by the PHA.
7. **Environmental assessment:** An environmental review or request for HUD to perform the environmental review pursuant to [24 CFR 905.308\(b\)\(2\)](#).

The development proposal should include:

1. **Project description:** Proposed development method, type of residents to occupy units, number and type of units, non-dwelling space, and schematic drawings.
2. **Site information:** Identification and description of the proposed site and neighborhood, a site plan, and a map of the neighborhood.
3. **Participant description:** Identification of participating parties and a description of the activities to be undertaken by each and legal/business relationships.
4. **Development project schedule:** Schedule of each major stage of development.
5. **Accessibility:** Sufficient information to determine proposal meets accessibility requirements.
6. **Project costs:** Budget, TDC calculation, and financing.
7. **Operating pro-forma/Operating Fund methodology:** Assess the financial feasibility of the project through a 10-year operating pro-forma.
8. **Local Cooperation Agreement:** PHA may elect to exempt all public housing units in a mixed-finance project from the payment in lieu of taxes provision.
9. **Environmental requirements:** Complete a Request for Release of Funds and environmental certification in accordance with [24 CFR part 58](#) or [24 CFR part 50](#).
10. **Market analysis:** For mixed-finance development that includes nonpublic housing units, the PHA must include an analysis of the projected market for the proposed project.
11. **Program income and fees:** Provide information identifying fees to be paid to the PHA, partner(s), the owner entity, and/or other participating parties identified by HUD and on the receipt and use of program income.

Repositioning

Through repositioning, a PHA evaluates what regulatory platform is best suited for the PHA to meet the long-term affordable housing challenges in its specific community, considering the needs of the residents, the condition of the real estate portfolio, and the objectives of the PHA and other community leaders. There are four primary reasons that PHAs seek to reposition their public housing portfolios:

1. **Local control and flexibility to meet local needs:** Repositioning leads to more local control over the use of a PHA's public housing assets to reconfigure and finance as needed.
2. **Administrative relief:** Converting public housing to a Section 8 program can offer significant regulatory and administrative relief.
3. **Predictable and stable funding platform:** Historically, Section 8 programs have offered a more reliable and constant funding stream than the traditional public housing program. In some instance, conversion to Section 8 can also result in higher funding.
4. **Ability to leverage:** The Section 8 programs are more conducive to raising debt and equity to help an agency achieve strategic goals, from addressing backlog capital needs and building long-term reserves necessary for preservation-oriented lifecycle improvements to constructing or acquiring new housing.

The PHA's size and the programs administered will determine what repositioning options are available, if any (e.g., [Rental Assistance Demonstration](#) and [Streamlined Voluntary Conversion](#)). To assist PHAs with navigating the complexities of repositioning, HUD has developed a series of guides tailored to the size of the PHA:

- [A Guide to Public Housing Repositioning: Very Small PHAs](#)
- [A Guide to Public Housing Repositioning: Small PHAs](#)
- [A Guide to Public Housing Repositioning: Medium and Large PHAs](#)

5. Transition to Normalization

The severity of the disaster will determine the length and difficulty of the transition back into normal business operations. During the crisis, a PHA may have relied on the assistance of local community organizations, other PHAs, contractors, and/or federal organizations to continue the PHA's mission. To regain independence, a PHA will have to strategize the best method to reduce the need for assistance and ensure that staff has the appropriate means and capacity to resume operations.

After the community has stabilized, the local response team should analyze its effectiveness in responding to the crisis. This will be an opportunity for local partners to recognize their strengths and weaknesses and explore opportunities to further bolster the community's emergency plans and procedures. In addition, the community should explore areas to further promote resilience and mitigation opportunities. As a result, the PHA and community partners will be more prepared and influential during the next emergency.

Appendix A: List of Acronyms

ACC	Annual Contributions Contract
ACOP	Admissions and Continued Occupancy Policy
APE	Area of Potential Effect
AMP	Asset Management Project
BRIC	Building Resilient Infrastructure and Communities
CDBG	Community Development Block Grant
CDBG-DR	Community Development Block Grant- Disaster Recovery
CFFP	Capital Fund Financing Program
CFP	Capital Fund Program
COOP	Continuity of Operations Plan
CY	Calendar Year
D3R	Disaster Recovery, Readiness, and Response
DBA	Database Adjustment
DDA	Demolition/Disposition Application
DHS	U.S. Department of Homeland Security
DOT	Declaration of Trust
ED	Emergency Declaration
EH&S	Exigent Health and Safety
EMS	Emergency Medical Services
EPC	Energy Performance Contract
EPS	Exceptional Payment Standards
ERR	Environmental Review Record
FEMA	Federal Emergency Management Agency
FEMA IA	Federal Emergency Management Agency – Individual Assistance
FEMA PA	Federal Emergency Management Agency – Public Assistance
FMA	Flood Mitigation Assistance
FMAG	Fire Management Assistance Grants
FMD	Financial Management Division
FMR	Fair Market Rent
FONSI	Finding of No Significant Impact
FY	Fiscal Year
HAP	Housing Assistance Payment
HCV	Housing Choice Voucher
HMGP	Hazard Mitigation Grant Program
HQS	Housing Quality Standards
HUD	U.S. Department of Housing and Urban Development
IFB	Invitation for Bid
IHP	Individuals and Household Program
IMS/PIC	Inventory Management System/PIH Information Center
MASS	Management Assessment Subsystem
MDD	Major Disaster Declaration
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NOI	Notice of Intent
NSPIRE	National Standards for Physical Inspection

OFFP	Operating Fund Financing Program
Op-Fund	Operating Fund
Op-Sub	Operating Subsidy
PDD	Presidential Disaster Declaration
PHA	Public Housing Agency
PHAS	Public Housing Assessment System
PIH	Office of Public and Indian Housing
PII	Personal Identifiable Information
PNA	Physical Needs Assessment
RAD	Rental Assistance Demonstration
RE	Responsible Entity
REAC	Real Estate Assessment Center
RFQ	Request for Qualifications
RROF	Request Release of Funds
RSS	Recovery Support Strategy
SAC	Special Applications Center
SMHO	State Hazard Mitigation Officer
SVC	Streamlined Voluntary Conversion
TAC	Technical Assistance Center
TDC	Total Development Cost
TSA	Transitional Sheltering Assistance
TPV	Tenant Protection Voucher
UPCS	Uniform Physical Conditions Standards
VOAD	Voluntary Organization Active in Disaster

Appendix B: Funding Sources

Fund	Source	Summary	Reference
Insurance	PHA	PHAs are required to have adequate insurance to promptly cover the cost to restore, reconstruct, and/or repair any damaged or destroyed public housing property.	Readiness: 2.4 Insurance , Recovery: 4.5 Funding Sources
Flood Insurance	PHA	All public housing properties located in a flood plain (100-year flood plain) must maintain adequate flood insurance to restore damaged public housing property.	Readiness: 2.4 Insurance
Operating Fund (Op-Fund)	HUD	PHAs are provided with operating subsidy to help them meet operating and management expenses in the public housing program.	Readiness: 5.1 Financial Resources
Operating Fund Financing Program (OFFP)	HUD	PHA may use a portion of its Operating Fund reserve balances to collateralize financings and pay debt service and customary financing costs where the financing is used for public housing development or modernization of public housing units.	Readiness: 5.1 Financial Resources
Capital Fund Program (CFP)	HUD	PHA's annual funding for the development, financing, and modernization of public housing projects.	Readiness: 5.1 Financial Resources
Capital Fund Financing Program (CFFP)	HUD	PHA may borrow private capital to make capital improvements to public housing properties and pledge a portion of its future years' annual CFP to make debt service payments.	Readiness: 5.1 Financial Resources
Capital Fund Emergency/Natural Disaster Fund	HUD	Reserved CFP appropriations for PHAs to confront the impacts of a disasters requiring an application and funded on a first-come, first-served basis.	Readiness: 5.1 Financial Resources
Energy Performance Contracting (EPC)	HUD	Innovative financing technique, which uses cost savings from reduced energy consumption to repay the cost of installing energy conservation measures at public housing properties.	Readiness: 5.1 Financial Resources
Community Development Block Grant – Disaster Recovery (CDBG-DR)	HUD	Flexible grants to help areas rebuild and provide crucial seed money to start the recovery process.	Recovery: 4.5 Funding Sources
FEMA Public Assistance (FEMA PA)	FEMA	Grant assistance for debris removal, emergency protective measures, and the restoration and mitigation of disaster-damaged facilities, including public housing.	Recovery: 4.5 Funding Sources
FEMA Individual Assistance (FEMA IA)	FEMA	Provides financial and direct services to eligible individuals and households affected by a	Recovery: 3 Rehousing

Fund	Source	Summary	Reference
		disaster, who have uninsured or underinsured necessary expenses and serious needs.	Displaced Residents
Building Resilient Infrastructure and Communities (BRIC)	FEMA	Support for hazard mitigation projects, reducing the risks from disasters and natural hazards.	Readiness: 5.1 Financial Resources
Hazard Mitigation Grant Program (HMGP)	FEMA	Financial backing to develop hazard mitigation plans and rebuild in a way that reduces, or mitigates, future disaster losses in communities.	Readiness: 5.1 Financial Resources
Hazard Mitigation Grant Program Post Fire Assistance (HMGP Post Fire)	FEMA	Help communities implement hazard mitigation measures that substantially reduce the risk of future damage, hardship, loss, or suffering in any area affected by a fire.	Readiness: 5.1 Financial Resources
Flood Mitigation Assistance (FMA)	FEMA	Funds for projects that reduce or eliminate the risk of repetitive flood damage to buildings insured by the National Flood Insurance Program .	Readiness: 5.1 Financial Resources
State/Local Funds	Varies	Individual states and localities may organize funding resources to assist recovery efforts with the community.	Recovery: 4.5 Funding Sources
Charitable Organizations	Varies	Local charitable organizations may offer temporary housing and other resources for survivors.	Recovery: 3 Rehousing Displaced Residents
Voluntary Organizations Active in Disasters (VOAD)	Varies	National VOAD, an association of organizations that mitigate and alleviate the impacts of disasters.	Recovery: 3 Rehousing Displaced Residents , 4.5 Funding Sources