

PHA Disaster Readiness and Preparation Guide

2016



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

Introduction

In the past decade, Public Housing Authorities (PHAs) have been affected by natural disasters. Examples include the PHAs affected by Hurricanes Sandy, Ike, Rita and Katrina, tornados in Joplin, MO in 2011, and various floods. These disasters resulted in both loss of life and property damage. In order to protect their properties and their tenants, many PHAs have prepared emergency plans or disaster response plans to prepare staff and tenant households for emergencies. At various times, the Department of Housing and Urban Development (HUD) has sought to learn how PHAs have prepared for emergencies as well as the lessons learned in the aftermath. Accordingly, HUD has reviewed emergency plans prepared by PHAs and engaged executive directors and staff at PHAs that have been affected by a disaster. This document discusses some of the best practices and lessons PHAs have shared with HUD based on their local knowledge and experience.

This document is not exhaustive. We intend for it to serve as a list of vital issues that PHAs should consider when formulating disaster/emergency preparation plans for them. Therefore, this is a working document and will be refined by the suggestions and best practices of PHAs gleaned from past emergencies. Please consider this a starting point for your planning process, as risks and local conditions often necessitate a tailored approach.

HUD also encourages PHAs to seek additional information about emergency preparation from local emergency management and disaster response agencies, organizations such as the Red Cross, and the Federal Emergency Management Agency.

Sincerely,



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Section I: Pre-Disaster Preparedness

Post-disaster recovery is most effective when efforts are made prior to a disaster to organize resources and systems, develop partnerships, identify needs, and undertake recovery planning and preparedness. Public Housing Authorities (PHAs) should implement the following six steps to prepare for any magnitude of a catastrophic event: 1) Risk Assessment, 2) Coordination, 3) Resource and Guidance Development, 4) Partnership Development, 5) Readiness and Staffing, and 6) Training.

At the core, disaster planning by the PHA will be most effective when integrated with the larger community planning process and PHAs should work to integrate and coordinate the planning. It may be impossible to successfully “go it alone” during a disaster.

1. Risk Assessment

Engage in a local risk-based planning process. Emergency planning and preparation is a risk-based exercise. The process requires examining risks to the PHA and preparing for them based on likelihood of occurrence and potential impact to the PHA if an emergency occurs. The following assumptions are necessary to plan for recovery operations when facts are not known or available:

- A catastrophic incident or attack will occur with little or no warning.
- There will be cascading effects associated with the incident.
- Inter- and intra-state, local, tribal, territorial, and insular area government mutual aid capabilities will be exhausted.
- Local government capabilities may not exist or be functional.
- Other Federal agencies are executing relevant support under their own authorities.
- A disaster declaration has been issued by the President and FEMA is operating under Stafford Act authority.

While it is likely that all of these conditions will not be met in any given situation, such situations are the highest risk to the PHA. By planning for such a scenario, a PHA will be prepared for the worst possible outcome, and can therefore scale down its response to the appropriate level.

Emergency planning for disasters is highly dependent on location because it is a risk-based process. Certain potential disasters are highly geographically dependent, especially weather-related phenomenon. Local or state emergency management agencies may have already completed risk identification in your community. PHAs should use the results of these local planning efforts to assess what likely hazards have the potential to disrupt day-to-day activities

and/or cause extensive property damage, personal injury, and casualties. For your planning, consider potential impacts to your residents and operations while you are assessing the risk. Just because there is a limited chance an event will occur is not a reason for you to discount the risk.

Disaster risks could include natural, technological, or man-made risks. To a great extent, planning for and responding to those risks will be quite similar regardless of cause. Your 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: 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 injury, 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, several useful tools you can also use to conduct multi-hazard risk assessments are provided online at <http://www.fema.gov>.

Vulnerabilities are the intersection between the natural environment, social systems, and the built environment. Therefore, a more 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 health care, availability of well-paying jobs, commuting time, types of neighborhoods, access to social services, places of worship, and other choices that form the fabric of lives and communities.

- **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 (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 the vulnerability of the built environment. The density of the built environment is also a contributing factor as there is greater exposure and potential for damage. Housing is susceptible to external impacts such as utility outages that impact the habitability of the dwellings. Within public housing, many 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 for some demographic and social characteristics make communities more vulnerable than others. Key factors include age, gender, race, color, national origin, acute medical needs, socioeconomic status, individuals with disabilities and others with access or functional needs, familial status, religion, persons with Limited English Proficiency (LEP), and immigrants. Barriers to accessing services, resources and information, as well the ability to absorb the impacts of hazards and disasters without governmental interventions, impact communities.

2. Coordination

PHAs are one entity of many in a local community, and catastrophic events require joint efforts of all community organizations working together to overcome its impacts. In order to accomplish this, the PHA should understand the larger community plan and ensure the decisions are integrated with the needs of the PHA. Proper coordination with community partners will better align resources to support preparation and planning for disaster recovery. Most PHAs do not have the resources to duplicate the response capacity of their larger community, and HUD does not recommend trying to do so.

Pre-disaster coordination activities will clarify what post-disaster support local, state, tribal, territorial, and insular area entities can provide, define how this support will be functionally linked to PHAs, and establish information sharing and communication protocols.

Coordination opportunities include joint level meetings, after-action reviews, identification of recovery support gaps ahead of disasters, partnerships to fill post-disaster housing recovery gaps, and other initiatives aimed at improving the effectiveness of permanent housing recovery efforts.

These coordination efforts will encourage and support planning for post-disaster permanent housing requirements by the local, state, and insular area entities that lead local community planning and development, as well as addressing housing needs, land use, and building code administration.

The Federal Emergency Management Agency has 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. This document, which can be found at <https://www.fema.gov/media-library/assets/documents/24600>, is an extremely useful resource that should be reviewed before engaging in any coordination efforts, as it ensures common understanding of possible roles and responsibilities.

3. Resource and Guidance Development

Establishing processes and structures for post-disaster recovery coordination during pre-disaster planning can greatly enhance the speed and success of recovery, and can also increase resiliency. Pre-disaster actions can also reduce the scale and magnitude of recovery needs. PHAs should identify all possible resources and develop procedures that can be implemented where applicable.

3.1. Partner Agencies

PHAs should also consider having an up-to-date list of local disaster services and resources beyond 911. Storing this type information both on-site and off-site will ensure it remains readily available. Additionally, PHAs should consider working in advance with local jurisdictions and first responders to understand and determine who will take responsibility for property evacuation and preparedness, as well as what resources and information will be shared in the event of a disaster. This contact information can be stored in a PHA's Continuity Plan, see **Appendix C: Continuity Plan Template and Instructions for Non-Federal Governments**.

Examples of valuable resources include:

- Government
 - Municipal, County, State disaster response teams
 - HUD Field Office
 - FEMA
- First Responders
 - EMS
 - Police Department
 - Fire Department
- Non-profit and Charitable Organizations
 - The Red Cross
 - Faith based organizations
 - Food banks
 - Emergency Shelter
 - Civil rights and fair housing organizations
- Contractors and Services
 - Utility shut-off contacts
 - PHA insurance agent
 - Emergency Contractors

3.2. Funding and Support

In order to mitigate and/or respond to a catastrophic event in a timely manner, it is beneficial for a PHA to be knowledgeable and aware of all potential financial and supportive resources. These resources may come in a variety of forms with specific requirements that the PHA will have to research and become familiar with. For example, much federal funding will only restore the condition of units to pre-existing condition, and does not allow for upgrades or improvements. Since a major reconstruction after a disaster may provide the best opportunity for increasing building safety and resilience, PHAs should be prepared to research multiple sources of funding for reconstruction.

Insurance: In accordance with the Consolidated Annual Contributions Contract (CACC), PHAs are required to have insurance on all of their Public Housing developments under the CACC. Part B of the CACC, specifically Attachment VII, lists the mandatory and optional types of insurance coverage. Of special note, if a PHA has developments that are located in a flood plain, the PHA must have flood insurance. If the PHA does not have flood insurance, they will not be covered by FEMA for the damages incurred in a Presidentially declared disaster. In the aftermath of Hurricane Sandy, there were a few PHAs that did not have adequate flood insurance, and as a result, those PHAs suffered unreimbursed losses.

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, a PHA should review FEMA flood maps on a recurring basis to determine if the floodplain now encompasses additional Public Housing properties. FEMA has a system to allow individuals to sign up for email notification when the flood maps are changed. The website can be found at <https://msc.fema.gov/portal/subscription>. After a determination has been made the PHA should notify the local HUD Field Office with the details of their portfolio and verify that all properties located in the floodplain contain flood insurance.

In the occurrence of a catastrophic event the PHA will first rely on the coverage offered by their insurance. To select adequate coverage the PHA should refer to their Risk Assessment, and diligently research the most applicable line of coverage. During a disaster, the PHA must maintain a clear record and document all expenses to aid in the insurance claim.

Capital Fund Program: The CFP provides funds annually to PHAs for the development, financing, and modernization of public housing developments and for management improvements. Adequately utilizing the Risk Assessment will identify preventive opportunities that can be typically financed with CFP, such as improvements to the building envelope to prevent damage. In addition, capital funds can be used in coordination with any disaster funds to repair any capital damage.

State/Local Funds: Some municipalities or local jurisdictions may have available funds and/or services to assist in preventive opportunities. One example is the HUD funded *Community*

Development Block Grant – Disaster Recovery (CDBG-DR) program. PHAs should consult with these organizations to determine what is available to their agency and what resources and eligible expenses are identified in the community’s Consolidated Plan. Such assistance may be limited. In addition, any CDBG-DR funding is at the discretion of the state to disburse to all organizations in need. PHAs should establish contacts with their state disaster coordinating office so that if such funding is available, they will be able to quickly learn the application process. After Hurricane Sandy, some PHAs were last in line for funding because there was little realization by the State of the PHAs’ needs.

Capital Fund Emergency/Non-Presidentially Declared Natural Disaster Funding: To cover the additional cost that insurance does not cover in non-Presidentially declared disasters, the PHA can apply for Capital Fund Emergency/Non -Presidentially Declared Natural Disaster Funding. Each year Congress sets aside funds within the Capital Fund appropriation to create a reserve for emergencies and non-presidentially declared natural disasters. PHAs facing an emergency situation or a natural disaster are eligible to apply for and receive funds from the reserve, provided that they comply with certain requirements. PHAs are only eligible to use these funds in the case of a non-Presidentially declared natural disaster.¹ However, this is a limited pool of funding, and may have already been spent at the time of a specific emergency.

FEMA: During a presidentially declared disaster FEMA will provide assistance primarily through three programs: 1) Public Assistance, 2) Transitional Shelter Assistance, and 3) the Hazard Mitigation Planning and Assistance. FEMA can provide assistance to both residents of public housing or HCV holders and directly to the PHA for emergency work/response costs and permanent repair, replacement, or reconstruction of disaster-damaged PHA facilities. All documents associated with the disaster must be retained by the PHA. In prior disasters, PHAs have been denied FEMA or insurance funds because of the lack of documentation. Examples of documents include: receipts, invoices, time sheets, payroll, contracts, and procurement documents. Extensive documentation is required by FEMA and the insurance company for reimbursable expenses. For more information on these programs refer to **Appendix B: FEMA Recovery Fact Sheet-Public Assistance Funding for Public Housing Facilities.**

Charitable Organizations: Philanthropic agencies are often great resources for connecting PHAs with local services like emergency shelters and other necessities for residents. PHAs should reach out directly to these types of organizations to identify what local services are available and to directly connect the PHA with a point of contact.

Disaster Specific Housing Assistance: At times, the federal government has established housing programs in response to Presidentially-declared emergencies. Examples include the Disaster Housing Assistance Programs (DHAPs) that were created in response to Hurricanes Ike, Katrina and Rita, and the CDBG-DR program funds that were appropriated after Hurricane Sandy. These programs are usually time limited, geographically specific programs. After a disaster, PHAs

¹ Per 24 CFR 24 CFR 905.200(a)

should check with their local HUD field office and the Disaster Recovery Special Issues Division of HUD to see if disaster specific assistance is available, but should not rely on such programs being established.

3.3. Continuity Plan

Pre-disaster recovery planning is paramount when developing an active and sustainable resilience mindset in communities. Therefore, incorporating resiliency strategies (such as business continuity planning) into daily operations is crucial.

HUD encourages economic partners to promote methods of facilitating pre-disaster recovery planning through their networks. In addition, HUD encourages PHAs 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. Partners at the Federal, state, municipal, insular area, and nonprofit levels have the opportunity to engage PHAs in enhancing resiliency. To assist PHAs in developing a Continuity Plan refer to **Appendix C: A Continuity Plan Template and Instructions for Non-Federal Governments**, which can be adapted for a PHAs use. PHAs in close proximity, with similar portfolios, and/or common risk exposure may find it advantageous to discuss common resources, risks, and response methods among each other as they develop their Continuity Plan.

The PHA planning process must consider three major elements:

- 1) PHA business operations
- 2) Impacts to the residents
- 3) Impacts to the physical infrastructure and housing portfolio

Community planning typically addresses the continuum of risks facing a PHA, ranging from frequent, low impact risks such as power outages or equipment failures, to infrequent, high risk such as major natural or manmade disasters. PHA planning should focus on filling in any gaps around community planning as well as meeting its own unique needs. For example, to supplement the community's planning for power outages, a PHA may wish to purchase portable generators to ensure proper heating or cooling for vulnerable tenants in a power outage.

PHA disaster planning should initially focus on the development of both a business continuity plan and an emergency response plan to assist staff and management. Continuity plans will help prepare PHAs for a wide variety of events with different magnitudes and impacts on a PHA's three major elements.

Plans should start with the following assumptions:

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

A plan should cover how the PHA intends to maintain core functions. Core functions include, but are not limited to:

- Facilitating the evacuation of residents prior to an emergency, including any responsibilities for PHA performing evacuation;
- Temporarily housing displaced households in common areas, if appropriate;
- Inspecting units to determine repair needs and recording their condition;
- Securing, stabilizing and assessing damage to other PHA owned property;
- Repairing damage to PHA units and properties;
- Conducting HQS inspections;
- Determine the location of public housing residents and Housing Choice Voucher (HCV) holders;
- Maintaining financial operations such as payroll, rent, HAP payments and procurement (vendor and consultant payments);
- Reestablishing/maintaining communication with all community and business partners (such as through telephone, internet and email); and
- Maintaining critical records.

Resident evacuation is particularly important as some communities may feel that the PHA is responsible for the planning and conduct of the PHA resident evacuations. 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.

In order to facilitate this type of planning, PHAs should maintain an updated unit and occupancy record for each building and development which can be accessed remotely, so that the information is centrally available.

In addition, PHAs should establish a plan for temporarily accommodating residents in other PHA properties if possible (such as common areas of other developments, or other space controlled by the PHA). This plan should consider the maximum number of occupants a space can legally and comfortably support, availability of security personnel to protect residents, accessibility issues, and access to bathrooms and cooking facilities.

PHAs can also 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 that have been affected by a natural disaster. Insurance agents can often help create such a list. In addition, PHAs should become familiar with and follow HUD emergency procurement regulations.

PHAs should also consider selecting sites where PHA operations are expected to continue in the event their central office or other facilities are affected by a disaster. To the greatest extent possible, a site should be selected based on accessibility for public housing residents, landlords, and others. Consider proximity to major roads or transportation. At a minimum, the PHA should identify the requirements (space, utilities, communications, etc) for all administrative spaces in order to rapidly identify requirements if one of those spaces must be replaced quickly. **Appendix D: *Developing Emergency Relocation Group Member Planning Guides*** can be utilized by the PHA to assist in the development of their own relocation plan. In the immediate aftermath of a disaster, another government agency or unaffected neighboring PHA may be able to provide support.

PHAs should also consider cloud-based storage of important records and documents, or storing paper copies at an off-site location. Important documents include recent tenant records, management documents, construction related documents, HUD Annual Contribution Contracts (ACC), 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 off-site, be sensitive to privacy and other sensitive information. Refer to **Appendix E: *Essential Records Plan Packet Template*** as a resource when developing a record retention policy.

4. Partnership Development

It is essential to continue furthering the relationship between the PHA and community partners after the initial coordination activities. Over time, agency management can change, policies and procedures are revised, and roles and responsibilities can be forgotten or changed. To address any changes requires all associates to be invested in the development of the partnership, and a willingness to notify the group of any changes or concerns as they become apparent. Facilitating an environment conducive to partnership can be accomplished by participating in recurring joint level 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.

4.1. Framework for Recovery Partners

- Identifying guiding principles for achieving a successful recovery

- Outlining pre- and post-disaster roles and responsibilities for recovery stakeholders and recommending leadership roles across all partnered agencies
- Describing how the community will build, sustain, and coordinate the delivery of the Recovery core capabilities
- Explaining the relationship between Prevention, Protection, Mitigation, Response, and Recovery
- Promoting inclusive and equitable coordination, planning, and information sharing processes
- Encouraging the community to leverage opportunities to increase resilience and incorporate climate adaptation and mitigation measures pre- and post-disaster
- Identifying scalable and adaptable organization for coordinating recovery
- Describing key factors, activities and considerations for pre- and post-disaster recovery planning
- Ensuring recovery resources are sourced from a wide range of community partners, including individuals, and voluntary, nonprofit, philanthropic, private sector, and governmental agencies and organizations

5. Readiness and Staffing

Successful recovery depends on all recovery stakeholders having a clear understanding of pre- and post-disaster roles and responsibilities. Clearly defined roles and responsibilities are the groundwork for all recovery partners to jointly identify opportunities, foster partnerships and optimize resources. The ability to perform essential functions rests upon key components built from the foundation of continuity planning and continuity program management. Identify requirements which are both internal and external to your organization and consider key continuity components of elements, including but not limited to:

- **PHA Leadership:** Identify chain of authority at least two levels higher. Is succession or delegation of authority planning required? The designation as a successor enables a person to act for and exercise the powers of the principal in the event of an emergency or crisis
- **PHA Staff:** This area identifies other team members that allow your PHA to provide the leadership advice, recommendations, and the functional support necessary to continue essential operations
- **Community Partners:** Roles and responsibilities should be solidified for each entity.
- **HUD:** HUD may be able to provide technical assistance, grant regulatory waivers or reporting extensions², and collect information to develop a disaster report.

² Any waivers or extensions would be granted on a case by case basis dependent on the nature of the disaster and PHA capacity.

- **FEMA:** (For Presidentially-Declared Disasters) FEMA will financially assist in resident relocation, and repairs and/or reconstruction of physically impacted properties.

6. Training

Often, crisis situations occur with little or no warning. As a result, there is typically no time to give out detailed instructions to organize staff and residents. To avoid confusion and panic the PHA should provide training for staff and residents beforehand. Workforce dynamics change after a disaster, so proper training and education will assist staff to better adapt to the changed work environment. Likewise, residents may be impacted to the extent that they have to relocate abruptly. Training will expedite this process, and reduce fears of the unknown.

Individuals must understand their roles and responsibilities within their respective organizations. They need to know and be committed to their duties in a challenging environment. This may involve separation from family or other hardships in time of crisis. Some might be required to report to work at a primary or alternate site, while others may be directed to remain at home for teleworking or to remain available for reach-back and staff augmentation. Individuals need to understand and be willing to perform in these situations so the organization can continue its essential functions.

Exercises are valuable in helping members of the team understand the challenges and their roles in an emergency. They can be structured as discussions during staff meetings or other gatherings, started with questions such as “how would we respond to a . . .?” or “what is our role in the PHA plan for . . .?” and followed by a facilitated discussion.

6.1. PHA Staff

Leaders and staff must be sufficiently trained to be able to perform their duties in a continuity environment (i.e., one in which the organization is faced with an interruption of normal operations for a potentially protracted period of time). In order to ensure that required skill sets are available, personnel should be cross-trained and vertically-trained to be able to perform the functions of their peers and the person above and below them in an emergency.

Recommended Training Areas:

- Business/emergency response plan
- Property managers should make reasonable efforts to identify residents with special needs (elderly, or persons with a disability, families with children or those with LEP), other access and functional needs or residents who may need special assistance during a disaster. Property managers cannot inquire into the specific nature of an individual’s special need, except to the extent that it impacts a resident’s ability to evacuate. Coordinate with family

members and emergency contacts, staff, or social services for delivery of necessary services and evacuation assistance. Determine if there is any additional planning that must be taken to ensure residents with an assistance animal will be able to keep their assistance animal with them during an evacuation and any relocation.

- Review the Continuity Plan and any development specific plan and maintain a copy at the property office
- Maintain a list of phone numbers and addresses to contact HCV tenants and property owners
- Application process for FEMA funds
- Assisting residents in avoiding duplication of benefits, which could result in recapture of funds from tenants and financial hardship;
- Avoiding duplication of benefits in receiving assistance from HUD or FEMA
- Drills and simulations to familiarize staff with proper procedures;
- Communicating with residents and the public in the case of a disaster, including ensuring effective communication with persons with disabilities and meaningful access for persons with limited English proficiency;
- working with senior citizens (e.g. those with dementia) during emergencies;
- psychological first aid training

6.2. Residents

Residents must be adequately trained regarding disaster procedures to maintain their health and safety during and after catastrophic events. In order to provide the required knowledge, PHAs should conduct frequent and diverse seminars to familiarize residents with appropriate disaster procedures.

Recommendations for pre-disaster preparation:

- Consider holding disaster preparation sessions with public housing residents which include engagement with residents and resident groups to ensure that they are familiar with any expected disaster response;
- Identify residents or resident groups who wish to take on any notification or other responsibilities in the event of a disaster;
- Drills and simulations to familiarize residents with proper procedures;
- Basic first aid classes for residents or resident groups who wish to take on responsibilities in the event of a disaster;
- Encourage residents, where applicable, to provide information to the voluntary needs registry.
- In addition, encourage higher risk residents to wear medical alert bracelets in case they become injured or disoriented and are unable to provide their names or medical information

- Identify communication approaches with local media that could be used if residents are displaced, and educate residents on these methods;
- Have Public Housing and HCV residents provide the PHA with emergency contact information for post-disaster assistance;
- Advise residents to contact the PHA in case they decide not to evacuate in case a voluntary evacuation is called for.
- Establish procedures for Public Housing and HCV residents to update the PHA with their whereabouts and damages to their unit;
- Ensure residents are aware of where to shelter in case of disasters like tornados, earthquakes or hurricanes, including appropriate signage indicating shelter spaces and resources;
- Post locations of emergency radios, if available for tenants and maintain a supply of first aid and emergency preparation supplies such as water, flashlights and batteries (Energy bars may also be a useful stock item);
- If there is time prior to a natural disaster, require all public housing residents who are planning to evacuate to notify property management, so that their whereabouts are not a concern during or after a disaster;
- Establish techniques to encourage residents to check in with staff after a disaster; and
- Research the application process for FEMA assistance

Section II: Post-Disaster Recovery

1. Activation and Deployment

In certain cases, PHAs may have advance notice of a potential disaster, such as tropical storms or wildfires warnings in the areas. If a PHA has advance warning of a disaster, they should begin preparing for the disaster by communicating information to staff and residents ahead of time, especially about the need to evacuate. They should also complete preparations of the PHA facilities as described in planning documents (this might include actions to reduce water infiltration or removal of flammable materials from near structures). After the catastrophic event occurs, the PHA should refer to their continuity plan, contact their community partners/coordinating agencies, and begin implementing the established procedures. Again, property managers should seek to provide additional assistance to individuals with special needs if feasible.

2. Assessments

After a disaster occurs, the PHA should begin conducting an assessment of the Business Operations, Residents, and Housing Stock to gain a better understanding of the impact of the catastrophe on these areas. The PHA will therefore be able to better address its needs and recover from the impacts more efficiently.

In addition to PHA staff conducting assessments and assistance, the PHA may have to rely on their established community partners, or even other PHAs within the area to meet the demand. HUD encourages PHAs to reach out to each other and to local industry groups after disasters to organize assistance and pool resources. In the aftermath of a disaster, there will be an increased workload for affected PHAs, and individuals who understand administrative processes are beneficial resources for damage assessment, resident support, and other critical issues.

2.1. Business Operations

Assessments should first begin with gauging the welfare and capacity of the PHA staff as it transitions into conducting other essential functions. Leadership can begin by contacting essential staff and later branch out to the remaining staff to ascertain the health and safety of the employees and their families. Afterwards, the PHA will have a list of staff who are capable of reporting to work when it is deemed safe to do so, and thus tasks can be delegated. In addition, the central office and any scattered site offices should be evaluated for the operational capacity, and damages to equipment and records. An evaluation should look at:

- Whether utilities are functioning;
- If data integrity has changed;
- If operational functions may need to be transferred temporarily to other agencies or entities;
- Are communications functional.

Business Operations Assessment

- Verify employees' health and safety;
- Confirm PHA office's operational capacity; and
- Validate the status of office equipment, records, and other resources.

2.2. Residents

It is a good precaution to have staff (or resident leadership) check on all public housing residents in affected developments physically, and, if need be, call HCV tenants and property owners to determine if they have been affected. PHAs should focus their efforts to first verify the wellbeing of the most vulnerable, the elderly, individuals with disabilities and other access and functional needs, and families with children. In certain cases, the PHA might have to assist residents to relocate to emergency shelters, or other temporary housing. In addition, the PHA might have to contribute in gathering essential resources for impacted residents. For example, fresh water, food, heat, medicine, and other supplies might be difficult for residents to obtain on their own. Once whereabouts and status of residents have been established, PHA staff can better focus on repairing property damage and long-term recovery.

Resident Assessment

- Verify tenants' health and safety;
- Validate the location of tenants;
- Gauge if tenants have essential utilities (e.g., water, heat, electricity, and sanitary facilities) or will need to be relocated; and
- Determine if tenants have basic necessities (e.g., fresh water, food, blankets, and other essentials).
- Conduct an assessment of accessibility and other access and functional needs.

2.3. Housing Stock

Following a disaster, current information on the condition of the housing stock will be critical. The approach to the conducting of housing stock assessments will vary based on the size of the inventory, location of the units, density of the public housing, the capacity of the PHA staff, environmental constraints, and a number of other variables. Information on the condition of the housing stock will often be requested by HUD, FEMA and others outside the PHA.

Initially, the PHA will have to conduct a preliminary assessment in a relatively short period of time to gain a broad overview of the status of the housing stock. Often, this will allow many units to be eliminated from additional inspection efforts because they are identified as undamaged. This may be based on resident reports and/or staff evaluation where possible. At the conclusion of this preliminary assessment, the PHA will begin to be able to prioritize which properties need more in-depth analysis or immediate attention. The assessment process should continue until the status of every unit has been determined.

Depending on the PHA's capacity to conduct housing assessments, they may have to request the assistance of other PHAs or rely on a third party contractor. This effort will conclude once the condition of all units is known and classified.

Public Housing Stock Assessment

- Preliminary assessment of entire housing stock;
- Classification of units with no damages, minor damages, major damages, and/or those that are uninhabitable; and
- Cost analysis of unit and building damages.

To ensure that HCV housing is in good condition, be prepared to suspend auto-pay of HAP payments. This encourages HCV property owners and landlords to check in with the PHA in person in order to receive their payment. The PHA can then check with the landlords to make sure units can still be occupied in a safe, decent and sanitary condition. The PHA or another PHA under an interagency agreement should conduct HQS inspections of damaged properties where HCV residents live. It also provides staff with an opportunity to find out more about the status of HCV tenants. Other PHAs may be able to assist with the inspections of HCV units.

HCV Assessment

- Preliminary assessment of all HCV units; and
- Conduct special HQS inspections of units in concern.

3. Recovery Support Strategy

For a PHA to regain normality in an efficient time period, creating a Recovery Support Strategy (RSS) is essential. This process provides a unified approach that describes and prioritizes the specific steps that address the needs of the PHA. The RSS will detail the structure and protocols for coordinating recovery support. Furthermore, the RSS identifies how the PHA and Partners' operations will contribute to the development, coordination, and management of each PHA property and program. Ultimately, the RSS will provide an anticipated timeline for engaging with disaster-impacted communities and the duration of support to be provided at each property and/or program. The RSS must account for the unique needs of individuals with disabilities and ensure all supports and implementation strategies are conducted in a nondiscriminatory manner.

The RSS can be broken into the following three sections: 1) Short-Term Recovery, 2) Intermediate Recovery, and 3) Long-Term Recovery.

3.1. Short-Term Recovery (0-6 Months)

- Early recovery management capacity assistance (interim recovery activities for organizing, structuring, and managing recovery);
- Evaluate activities, capacity of, impacts on, and needs of PHA (Individual Assistance [IA], Public Assistance [PA], Mitigation, and other programs);
- Assessment of impacts and potential needs for planning and capacity technical assistance
- Identification of available recovery planning and capacity resources;
- Actions to return units to habitable condition;
- Identification or opportunities to increase resilience and building performance as part of the recovery;
- Early recovery planning, community engagement, capacity building, and technical assistance to highly impacted communities;
- Partnership identification and formulation;
- Maintaining appropriate records of expenses in case expenses are eligible to be reimbursed. This includes payroll and tracking of the allocation of work that is funded by different grants; and
- Maintaining appropriate records of procurements.

3.2. Intermediate Recovery (6-12 Months)

- Recovery management organization development;
- Capacity building for recovery management, including development of organizations at local, state, tribal, territorial, and insular area levels to transition long-term;
- Identification of recovery planning and capacity resources;
- Review and update of response and recovery plans;
- Partnership formalization and implementation; and
- Detailed or specific recovery planning, capacity building and technical assistance.

3.3. Long-Term Recovery (12 Months-Ongoing)

- Capacity building for recovery management, including development of organizations at local, state, tribal, territorial, and insular area level to transition long-term management activity;
- Redevelopment planning and design;
- Resource identification and coordination;
- Implementation of recovery efforts;
- Project implementation, grants, and financial management; and
- Partnership implementation and refinement and development of long-term redevelopment partnerships.

4. Coordination and Technical Assistance

During a catastrophic event a PHA will be faced with several areas of concern, numerous impacted people, and several organizations which will require proper coordination and attention in order to address the situation. In some circumstance the PHA will have to be the lead coordinating party and provide technical assistance, such as assisting public housing and HCV residents. The PHA should always serve as an advocate for their residents. In other circumstance the PHA will be able to receive technical assistance from HUD and FEMA, as well as support from other community partners.

4.1. PHA Assisting Residents

If public housing units become too damaged to occupy, the PHA may need to find residents shelter for a few nights (common areas at other developments, for example), until FEMA shelters or other longer-term options become available. Have a plan as to where you intend to send

residents from each development, depending on property suitability, condition, and accessibility issues. Knowing the number and composition of the families you need to assist will speed the process.

In addition, based on the scale of the disaster, the rental market may be distorted for years to come. Local rents may spike, and the vacancy rate may decrease rapidly. A PHA may need to consider opening up nearby counties or jurisdictions as places HCV holders can rent units. Also, if a PHA has a number of HUD-VASH vouchers, it may need to open up areas near VA medical centers or other VA offices to ensure that veterans can continue to be served.

4.2. HUD Technical Assistance

After a catastrophic event, the PHA should consult with their local HUD Field Office for guidance and technical assistance. In some circumstance the PHA may be able to apply for waivers that temporarily dismiss the PHA from reporting requirements in order to focus on issues at hand. However, waivers are situation specific and will be issued on a case-by-case basis.

In addition, the HUD Field Office can assist the PHA with the Capital Fund Emergency/Natural Disaster Funding application process and other HUD programs/resources. HUD's Disaster Recovery Special Issues Division) can also assist PHAs with long term recovery, such as providing guidance on any disaster specific assistance available and avoiding duplication of benefits for both residents and PHAs.

5. Communication and Information Sharing

Communication has to be at its best during a catastrophic event. There will be several impacted parties, as well as several available resources. It can be difficult to sufficiently match the correct resource to the correct need at the best of times, even more so during a catastrophic event due to interference to communication lines and additional stress from the circumstance. As a result, it is important to understand what information is important to share and obtain with each partner, and how to provide this information when traditional communication lines may be unavailable. Any communication with residents and members of the public must ensure effective communication with individuals with disabilities and meaningful access for persons with limited English proficiency.

5.1. Local Community:

Proper coordination with community partners can facilitate more efficient access to available resources. PHAs should work with their community partners to determine what type of information they need to share, when the information should be delivered, and what format is best for each partner. This will prepare the PHA for any obligations pertaining to information sharing.

5.2. Federal Emergency Management Agency (FEMA):

According to the Federal Emergency Management Agency's (FEMA's) website:

The Federal Emergency Management Agency 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 man-made, including acts of terror.

For PHAs, emergency work and responses are both work and costs outside the normal scope of responsibilities and daily activities, but which the PHA must engage in as part of a disaster response. These expenses may be reimbursable by FEMA. For example, if a PHA provides cots, generators, or toiletries to public housing residents as part of their disaster response, those costs may be reimbursable by FEMA. Similarly, if the PHA is paying salaries or staffing costs for activities that are not part of a normal situation, such as sand-bagging or debris removal or transporting residents away from a disaster, the PHA may be eligible for reimbursement of those staffing costs.

In the case of permanent repair costs, FEMA is authorized to provide assistance (through the Public Assistance program) to repair, replace or reconstruct disaster-damaged PHA facilities; unless Congress appropriates funds to HUD for emergency capital needs to repair those facilities. A PHA should consult with their local field office about what disaster response funds Congress has appropriated to HUD and whether or not those funds are specifically funds for capital needs or are part of a broader appropriation.

Requests for FEMA assistance are generally routed through the impacted state (the Governor appoints a State Coordinating Officer) to the FEMA Federal Coordinating Officer. This allows the state to identify the most critical needs and also manage the process as the Stafford Act (the disaster assistance legislation) generally requires a local financial match.

Many individuals are eligible for direct FEMA disaster assistance. For public housing residents and HCV holders however, receiving FEMA assistance for housing is more complicated. Residents and HCV holders may be eligible for temporary FEMA rental assistance or FEMA housing but must do two things to avoid duplication of housing assistance, which can result in FEMA seeking to reclaim assistance from the resident: 1) keep in touch with the PHA and, 2) inform FEMA that they were/are clients of a PHA/recipient of federal housing assistance.

The resident/HCV holder must keep in touch with the PHA during the time that FEMA assistance is being provided, to ensure that the resident is still considered a client of the PHA, but is not receiving any funding from the PHA for housing assistance. FEMA and HUD data sharing does not necessarily allow for a cross-check at the HUD/FEMA level for this

information. Often, recipients of federal aid do not distinguish clearly between receiving assistance from FEMA and receiving assistance from a PHA. In certain cases, once FEMA rental assistance expires, pre-disaster PHA clients will return to the PHA, expecting that they will immediately receive assistance again, as their income makes them still eligible for public housing or a HCV. However, with no contact from these clients for multiple months (possibly over a year), a PHA may have had to terminate them from the program, and a former client could once again go back to the end of the wait list. Instead, tenants should be working with PHAs to return to the public housing or HCV programs as soon as possible. For further FEMA guidance refer to **Appendix B: FEMA Recovery Fact Sheet-Public Assistance Funding for Public Housing Facilities.**

5.3. HUD:

Establish who will be responsible for communicating information to HUD, and to which offices and FEMA. In case of a very-large scale disaster, unit counts and status updates may be requested daily by multiple agencies. In the immediate aftermath of a disaster you are likely to know relatively little about the unit status, but plan to communicate with the local HUD office and with HUD headquarters staff, and expect the reporting to continue until some steady-state is achieved. **Appendix A: U.S. Department of Housing and Urban Development Situation Report** has an example of a Disaster Report which HUD headquarters prepared describing the status of HUD PIH programs. The types of information described in the report are the types of information that a PHA may be expected to provide HUD – an assessment of the condition of the housing, displaced families, properties without utilities, etc.

6. Transition to Normalization

The severity of the emergency situation will determine the length and difficulty of the PHA to transition back into normal business operations. During the crisis, the 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, the PHA will have to strategize the best method to wean off the provided assistance, and ensure that their staff has the appropriate means and capacity to resume operations.

After the PHA and other community partners have stabilized, the local response team should analyze their effectiveness in responding to the crisis. This will be an opportunity for local partners to recognize their strengths and weaknesses and develop a lessons learned exercise. Subsequently, the PHA and community partners will be more prepared and influential during the next emergency situation.

Appendix A: U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT SITUATION REPORT TEMPLATE

HUD-ASSISTANCE HOUSING: DAMAGED UNITS AND DISPLACED FAMILIES

PUBLIC HOUSING

Impacts to People and Properties:

Field Office	Baseline # of Impacted Units ³	# of undamaged/habitable units	# Occupied Units w/o Power ⁴	# Occupied Units w/o Heat ⁵	# Occupied Units Currently w/o Water ⁴	# Units Currently Identified as Damaged (details in chart below) ⁶	# PH Families Originally Evacuated/Displaced	# PH Families Permanently Returned or Relocated	# PH Families in Temporary Housing
Total									

Baseline number of units reported to have damage/utility loss immediately following Hurricane Sandy

² Number of occupied units that currently are without power

³ Number of occupied units that currently are without heat

⁴ Number of units currently identified to have damage from Hurricane Sandy

⁵ Number of families that have been relocated or permitted to return to their unit

⁶ Number of families that have been placed temporarily in a hotel, with family or friends, or other temporary housing as reported by the PHA

AVAILABLE UNITS

1. AVAILABLE PUBLIC HOUSING UNITS WITH DISASTER PREFERENCE

The list of available units and contact information will be provided to affected PHAs upon request. Rehousing will be arranged between PHAs. The number of available units can change daily depending on the individual PHA's waiting list and move-ins. It is important to note that only PHAs with a Disaster Preference will be able to adjust their waiting list to allow relocated Public Housing residents preference.

Field Office	# Available PH Units ⁷	# Bedrooms Total from Available Units ⁸	# Units with Waiting List Preference for Disaster Survivors ⁹	# Units that are Accessible ¹⁰	# of PHA Available Community Spaces ¹¹
Total					

⁷ Number of units confirmed by the PHA to be available for immediate occupancy. "Available Units" differ from general vacancies in that there is little to no preparation needed for occupancy, and the units are not pending occupancy.

⁸ Total number of bedrooms available considering the bedroom count for each confirmed available unit

⁹ Total number of available units at PHAs that have an established waiting list preference for natural disaster applicants

¹⁰ Number of units that PHAs report to be compliant with Uniform Federal Accessibility Standards or the 2010 ADA Standards for Accessible Design under title II of the ADA, with modifications as described in HUD's Notice on Instructions for use of an alternative accessibility standard, 79 Fed. Reg. 29671.

¹¹ Number of PHA community spaces available to be used for natural disaster relief effort.

Appendix B: FEMA Recovery Fact Sheet (dated May 20, 2010, posted to the web July, 2013)- Public Assistance Funding for Public Housing Facilities

FEMA

In the event of a Presidentially-declared disaster, FEMA will be the primary federal agency from which PHAs may receive recovery financial assistance and tenants may receive temporary shelter and other housing relief and assistance. If a natural disaster is not in a presidentially-declared area HUD may be the primary agency providing assistance through emergency capital funds and, potentially, disaster HCVs. PHAs are to submit all claims through their insurance provider.

FEMA will provide assistance in the event of a presidentially-declared disaster primarily through three programs: the Public Assistance Program (PA), Transitional Shelter Assistance (TSA), and the Hazard Mitigation Planning and Assistance programs.

Under the Stafford Act and with the repeal of Section 9(k) of the Housing Act of 1937 as part of the Housing and Economic Recovery Act of 2008, FEMA may provide funding to PHAs under PA for the repair, replacement, or restoration of disaster damaged public housing facilities. FEMA may provide TSA to eligible disaster survivors who have continuing need for shelter after congregate shelters have closed because they are unable to return to their homes for an extended period of time.

FEMA's Hazard Mitigation Planning program helps communities identify policies and actions that can be implemented in the long term to reduce the risk of future losses. The program provides grant funding for eligible mitigation activities that reduce disaster losses and protect property and life from future disaster damages. Following a natural disaster, communities should assess their eligibility for both programs and HUD staff should encourage communities to ensure that PHAs needs are met in the planning for and mitigation of future disasters.

Web-based FEMA training is available at <http://training.fema.gov/IS/crslist.asp> . Additional program information and resources are found below:

Public Assistance Program – FEMA

- PHAs are only eligible to receive FEMA assistance under PA if a disaster is presidentially-declared. If a disaster has been declared, a PHA is not eligible to receive HUD emergency capital funds. A FEMA fact sheet on PA for PHAs may be found below. Additional information on eligibility may be found at <http://www.fema.gov/public-assistance-eligibility>.
- Following a presidentially-declared disaster, a Regional Response Coordination Center (RRCC) is established by the National Response Coordination Center (NRCC) and coordinates initial federal response across agencies until a Joint Field Office (JFO) is established. A governor will appoint a State Coordinating Officer (SCO) to oversee state response and recovery efforts.

- In order to apply for PA funds, a PHA should first contact their SCO, through the state's Office of Emergency Management, to learn the specific process for applying for funds in their locality. The general process is that PHAs register with FEMA through their state, attend an applicant briefing, and submit an application substantiated by a damage assessment and other supporting information.
- ***HUD is not the point of contact for FEMA PA funds.*** PHAs sustaining presidentially-declared disaster-related damage should contact their state Office of Emergency Management. Contact information for each state's office of emergency management may be found at: <http://www.fema.gov/regional-operations/state-offices-and-agencies-emergency-management>
- The FEMA PA application form may be found below.
- In order to qualify for FEMA PA, PHAs should retain documentation of pre-disaster property condition through photographs, operational records, and physical needs assessments. PHAs should also keep all receipts for expenses paid after a disaster, document overtime work, maintain vehicle usage and mileage records, and take extensive photographs. Additionally, PHAs should be prepared to provide current insurance information for all affected properties to FEMA.
- In the event of a Presidentially-Declared Disaster, FEMA may require HUD to certify that a PHA will not be receiving HUD emergency capital funds⁷

Transitional Shelter Assistance (TSA) – FEMA

- TSA is provided by FEMA through a contract agent and not through HUD or the states. TSA allows individuals in disaster-affected areas to move into temporary shelter, such as a hotel room.
- To determine eligibility and to apply for TSA, affected residents should call **1-800-621-FEMA (3362)**.
- Alternative, shorter term shelter options include community and Red Cross shelters. A list of currently available Red Cross shelters may be found at <http://www.redcross.org/find-help/shelter> or by calling 1-800-RED-CROSS (733-2767).
- Disaster Recovery Centers (DRCs) will also be established as “store front” access for displaced residents to apply for FEMA assistance.
- FEMA and HUD will work together to compare lists of recipients of assistance through the JFO. The field office works directly with the JFO to ensure that residents do not receive duplicative assistance. The Disaster Team is not involved in this process.

Hazard Mitigation Programs – FEMA

- Prior to or following a natural disaster, communities may be eligible for FEMA Hazard Mitigation Planning and Assistance programs.
- Information on FEMA's Hazard Mitigation Planning Program may be found at <http://www.fema.gov/multi-hazard-mitigation-planning>.

⁷ Per 24 CFR 905.200(a), PHAs are eligible to use emergency capital funds only on non-presidentially declared natural disasters.

- Information on FEMA's Hazard Assistance Program may be found at <http://www.fema.gov/hazard-mitigation-assistance>
- Field offices should encourage PHAs and municipalities to work together in planning for hazards to ensure that PHAs needs are met.



FEMA

RECOVERY

FACT SHEET

9580.205

Public Assistance Funding for Public Housing Facilities

Overview

FEMA may provide funding to public housing authorities (PHAs) under the Public Assistance Program for emergency work costs and for the repair, replacement or restoration of disaster damaged public housing facilities. Previously, Section 9(k) of the Housing Act of 1937, as amended (Housing Act), authorized the Department of Housing and Urban Development (HUD) to provide disaster assistance to repair disaster-damaged PHA facilities. Therefore, FEMA could not provide disaster assistance for the permanent repair of PHA facilities eligible for funding under Section 9(k) of the Housing Act. FEMA could only reimburse for the eligible emergency work costs of such facilities. Congress repealed Section 9(k) of the Housing Act as part of the Housing and Economic Recovery Act of 2008, which the President signed into law on July 30, 2008 (now Public Law 110-289). FEMA now has authority to fund both the emergency costs and permanent repair of all PHA facilities for major disasters and emergencies

Eligible Work

- **Emergency Work:** FEMA may provide essential assistance under Section 403 of the Stafford Act to PHAs and American Indian and Alaskan Native designated public housing entities. This assistance may include debris removal, demolition of unsafe structures, and any actions necessary to reduce an immediate threat to life, property, and public health and
- **Permanent Work:** FEMA may provide assistance to repair, replace or reconstruct disaster-damaged PHA facilities **unless** Congress appropriates funds to HUD for emergency capital needs to repair, restore, or replace certain PHA facilities damaged in Presidentially declared major disasters. American Indian and Alaskan Native designated public housing entities may apply directly to FEMA for disaster assistance.

_____/signed/_____
-

5/19/10

Elizabeth A. Zimmerman

Date

**Appendix C: A Continuity Plan Template and
Instructions for Non-Federal Governments**

<http://www.fema.gov/media-library-data/1389194640607-1a5f9a6d6557846f6e5924eea089f798/Non%20Federal%20Continuity%20Plan%20Template%20and%20Instructions.pdf>

**Appendix D: Developing Emergency Relocation
Group Member Planning Guides**

http://www.fema.gov/pdf/about/org/ncp/erg_guide.pdf

Appendix E: Essential Records Plan Packet Template

<http://www.fema.gov/media-library-data/1403723708235-8739cde2b1a3542c3b40c7481886c620/Essential%20Records%20Plan%20Packet%202014.pdf>