



Planning Considerations: Disaster Housing

Guidance for State, Local, Tribal and Territorial Partners

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FEMA

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1. Introduction

In the aftermath of disasters, communities often face situations that require creative short-term and long-term housing solutions for populations with different geographic, infrastructure and socioeconomic challenges. Effectively moving survivors into post-disaster housing is a critical step toward long-term recovery. However, many jurisdictions do not have disaster housing plans, due in part to the perception that housing is solely the Federal Government's responsibility coupled with a lack of full-time disaster housing staff.

While some housing programs are federally resourced, they are state managed and locally executed. Planning for disaster housing should occur at all levels of government before a disaster strikes.

"The optimal framework for response and recovery is one that is federally supported, state managed, and locally executed."

2018–2022 Federal Emergency Management Agency (FEMA) Strategic Plan

1.1. Purpose

This document supplements Comprehensive Preparedness Guide (CPG) 101: Developing and Maintaining Emergency Operations Plans. It provides guidance on national housing priorities, types of housing, key considerations and housing-specific planning recommendations for state, local, Tribal Nations and territorial (SLTT) jurisdictions to use, in conjunction with the Six-Step Planning Process described in CPG 101, to develop or improve disaster housing plans.¹

1.2. Audience

This document provides guidance to SLTT partners as they develop disaster housing plans and strategies for their communities. In many instances, emergency managers coordinate the development of disaster housing plans with designated recovery leaders and appropriate housing and mass-care subject matter experts from across their jurisdictions and the private sector.

¹ Comprehensive Preparedness Guide 101: <https://www.fema.gov/emergency-managers/national-preparedness/plan>.

1.3. Organization

In this document:

- The main text reviews sheltering and housing phases; describes common considerations for disaster housing planning; summarizes available housing programs offered by various levels of government and the private sector; and helps planners tailor the Six-Step Planning Process from CPG 101 to develop their disaster housing plans.
- The appendices provide additional information on disaster housing programs, authorities and resources, as well as a planning checklist to aid planners in developing disaster housing plans.

1.4. Background

Each community has unique characteristics, resources, cultural considerations and demographics that impact its ability to rebuild homes and restore public services. SLTT jurisdictions should understand the risks that could displace individuals and households for long periods of time, the potential disaster housing needs of their communities and their capability and capacity to help address those needs via sheltering, temporary housing² or permanent housing solutions. Jurisdictions should tailor integrated sheltering and housing solutions and strategies for their residents to complement overall housing availability in the area.

2017 Hurricane Season Housing Figures

- Hurricane Harvey left nearly 75,000 homes with at least 18 inches of floodwater.
- Florida supported a peak of 191,764 people in nearly 700 shelters across the state.
- During peak demand, Texas sheltered 42,399 survivors in congregate shelters, with approximately 1,403 survivors still in shelters 30 days after Hurricane Harvey made landfall.
- While FEMA programs supported Texas' and Florida's efforts to move most survivors out of shelters into temporary housing within 60 days, shelter operations in Puerto Rico and the U.S. Virgin Islands extended past 90 days.
- By May 2018, nearly 4.8 million households affected by the 2017 hurricanes and California wildfires registered for Federal assistance, more than the previous 10 years combined.

2017 Hurricane Season FEMA After-Action Report, July 12, 2018

² The National Disaster Housing Strategy, published in 2009, uses the term "interim housing." However, since its publication, the accepted term has changed to "temporary housing."

The ability to comprehensively address the housing needs of disaster survivors routinely appears in annual National Preparedness Reports as an area for improvement, and other reports and studies have documented gaps in the Housing core capability. A 2012 survey by the Los Angeles Housing Department determined that most agencies and organizations in Southern California did not have disaster housing plans despite the impending threat of earthquakes in that area.³ More recently, after-action reports on disasters such as flooding, wildfires and hurricanes continue to highlight ongoing gaps in delivering efficient and effective housing solutions for disaster survivors.

These findings reinforce the importance of developing local disaster housing plans to better meet the diverse and complex needs of communities. To improve disaster housing capabilities across the Nation, SLTT jurisdictions should collaborate with regional partners, the private sector, nongovernmental organizations (NGOs) and the Federal Government to develop integrated disaster housing plans.

1.5. Housing Goals

The National Disaster Housing Strategy, released in 2009, established six national goals that create a common framework and provide a broad range of housing options, including sheltering, temporary housing and permanent housing, to meet urgent needs following a disaster, enabling individuals, households and communities to rebuild and meet their unique housing needs.⁴ The following six goals are guiding principles for SLTT jurisdictional-specific housing plans:

1. Support individuals and communities in returning to self-sufficiency as quickly as possible.
2. Define and fulfill fundamental disaster housing responsibilities and roles.
3. Increase our collective understanding and ability to meet the needs of disaster survivors and affected communities.⁵
4. Build capabilities to provide a broad range of flexible housing options, including sheltering, temporary housing and permanent housing.
5. Better integrate disaster housing assistance with related community support services and long-term recovery efforts.

³ Los Angeles/Long Beach/ Riverside Regional Catastrophic Planning Grant Program Region Assessment and Gap Analysis Report, 2012. <https://housing.lacity.gov/wp-content/uploads/2021/05/Disaster-Housing-Assess-Gap-Analysis-Rpt.pdf>.

⁴ National Disaster Housing Strategy, January 16, 2009. <https://www.fema.gov/pdf/emergency/disasterhousing/NDHS-core.pdf>. NOTE: A review of housing-related doctrine is ongoing. This document will be updated based on any changes to key principles, terms and authorities.

⁵ The National Disaster Housing Strategy uses the term “disaster victims.” However, since publication of the document, the accepted term has changed to “disaster survivors.”

6. Improve disaster housing planning to better recover from disasters, including catastrophic events.

1.6. Disaster Housing Assistance

Consistent with the principles of the National Incident Management System, most incidents begin and end locally and typically require a unified approach from local agencies, the private sector and NGOs. While some incidents⁶ require additional support from neighboring jurisdictions or state governments, each jurisdiction or state should leverage its own resources and programs to help displaced survivors find housing or move back into their homes. The following sections describe some state and Federal housing programs that can help local jurisdictions secure viable housing solutions for all members of the community.

1.6.1. State Disaster Housing Programs and Resources

States have day-to-day housing responsibilities, but they also administer emergency housing programs. Many states implement these programs in conjunction with Federal assistance. Appendix A provides more information on state and Federal housing assistance programs.

Housing assistance also involves programs sponsored by or involving the private sector. In addition, states coordinate resources and capabilities across jurisdictions to support local activities, obtaining additional support through interstate mutual aid and assistance mechanisms such as the Emergency Management Assistance Compact (EMAC).

North Dakota's Flood-Impacted Housing Assistance Program

In 2013, the North Dakota Legislative Assembly directed the state's Housing Finance Agency to establish a grant program to help residents in flood-impacted areas rehabilitate or replace flood-damaged homes and provide transitional expenses to flood-impacted residents to facilitate housing availability.

1.6.2. Federal Disaster Housing Assistance

The Federal Government can provide direct temporary housing and permanent housing construction assistance to individuals and households only when all other housing options, including financial assistance for rent, transitional shelters and relocation, have been exhausted or are deemed

⁶ For the purposes of this document, "incident" includes planned events as well as emergencies and/or disasters of all kinds and sizes.

unreasonable. Direct temporary housing assistance is limited to situations in which traditional financial options are insufficient to meet the needs of the affected populations.

A host of Federal programs and grants, sponsored by various agencies such as FEMA, the Department of Housing and Urban Development (HUD), the Department of Agriculture (USDA) and the Small Business Administration (SBA), are available to help disaster survivors obtain temporary and permanent housing. Many of these programs have specific eligibility requirements; see the programs' website links in Appendix A to review eligibility criteria.

Following a Presidential emergency or major disaster declaration, Emergency Support Function (ESF) #6—Mass Care, Emergency Assistance, Temporary Housing and Human Services and the Housing Recovery Support Function (RSF) are the primary mechanisms to coordinate Federal disaster housing support⁷:

- Through ESF #6, the Federal Government provides assistance to eligible individuals and households, to include congregate sheltering and temporary housing.
- The Housing RSF, coordinated by HUD, helps SLTT governments identify resources—both human and financial capital—to help rehabilitate, modify and reconstruct destroyed and damaged housing, including developing new accessible, permanent housing options.

ESF #6 and the Housing RSF collaborate to provide a range of housing solutions. SLTT planners should involve representatives from the Federal ESF #6 and the Housing RSF in the planning process to better understand Federal sheltering and disaster housing programs.

Disaster Recovery Reform Act (DRRA) of 2018

This legislation authorizes FEMA to issue grants to states, territories and federally recognized Tribal Nations to implement direct housing assistance for temporary and permanent solutions as part of a two-year pilot program.

⁷ For more information on Emergency Support Functions and Recovery Support Functions, refer to the National Response Framework and National Disaster Recovery Framework at <https://www.fema.gov/emergency-managers/national-preparedness/frameworks>.

2. Sheltering and Housing Phases

The nature and magnitude of an incident drives the size, scope and scale of housing needs and the duration of assistance required. Planners should develop a range of integrated sheltering and housing assistance objectives to address the full spectrum of disasters, from smaller-scale incidents of short duration and concentrated impact to large-scale catastrophic incidents of widespread devastation that require long-term solutions. Disaster housing plans should be done iteratively and address the full range of potential incidents, from natural disasters to terrorism incidents and manmade events. Good references for determining applicable hazards are Threat and Hazard Identification and Risk Assessments⁸ and community hazard mitigation strategies and plans.

A range of sheltering and temporary housing options typically meet the housing needs for smaller-scale disasters. However, large-scale catastrophic incidents require extensive long-term reconstruction and rehabilitation to renew and revitalize the community and region. Some incidents, such as a radiological accident or catastrophic hurricane, may render an area uninhabitable for extended periods of time and require intensive advanced planning.

Sheltering and housing solutions have three segments: sheltering, temporary housing and permanent housing (Figure 1). Planning for disaster housing solutions and recovery starts prior to an incident, during the “steady state,” when there is time for stakeholder engagement, research and analysis and discussions on the viability of courses of action (COAs). Disaster housing planning continues after an incident, when the COAs are tailored and operationalized based on the specifics of the situation.

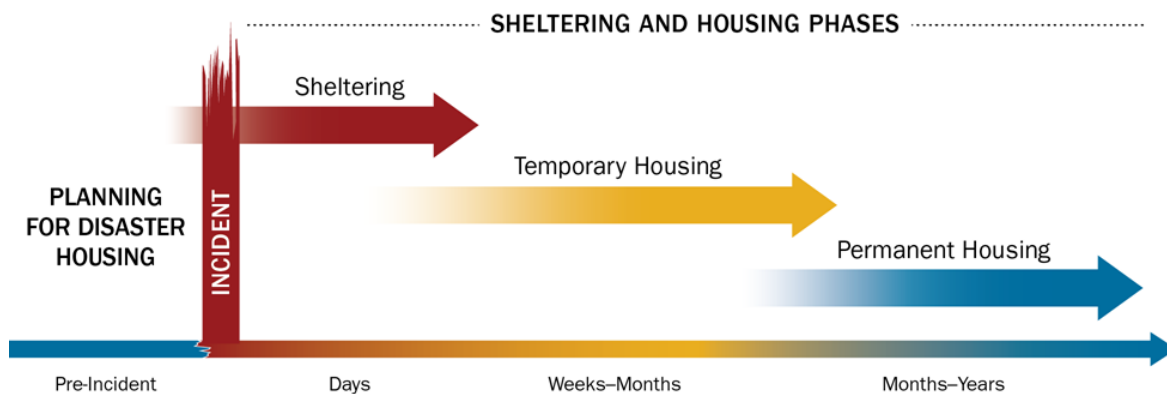


Figure 1: Sheltering and Housing Phases

⁸ Threat and Hazard Identification and Risk Assessment: <https://www.fema.gov/emergency-managers/national-preparedness/goal/risk-capability-assessment>.

Following a disaster, multiple stakeholders work to help displaced individuals and families find alternative housing arrangements. Planners must work with whole community partners to realize innovative solutions across all sheltering and housing phases.

- **Sheltering** generally occurs in the days immediately before and after a disaster and provides survivors who are displaced from their homes with a place of safety to receive shelter, food and other types of support. As disasters increase in size and complexity, the numbers and types of shelters increase, along with the number of people in them. This typically results in long-term sheltering (i.e., more than two weeks).
- **Temporary housing** is the intermediate period of housing assistance that covers the gap between sheltering and the return of disaster survivors to permanent housing.
- **Permanent housing** is the final housing phase, when disaster survivors move back into their repaired homes or attain another form of resilient long-term housing. This can take years.

2.1. Sheltering

NGOs work closely with local governments to plan and manage shelters that meet local needs. Sheltering may be precautionary, such as accommodating individuals prior to a severe storm or immediately following an incident. When required, additional support is provided by states, Tribal Nations or territories and, if necessary, by the Federal Government. In most cases, shelter residents return home within a short period of time or locate other housing on their own. However, in large-scale disasters, extended shelter stays may be required until individuals can either return home or transition to temporary or permanent housing.

Shelters serve multiple purposes. They provide a safe, sanitary and secure location for individuals and households to shelter or regroup; obtain updates regarding damages, casualties and response and recovery efforts; and in some instances, register for disaster assistance. All shelters, and the services they provide, must be accessible to those with access and functional needs.⁹

Major or catastrophic incidents require more intensive sheltering support. Not only will the number of people requiring shelter support be large, but extensive damage to structures and infrastructure will limit sheltering options and result in substantially longer shelter operational periods.

When the demand for shelters exceeds capacity or traditional shelters are not available, planners and emergency managers may need to use non-traditional (congregate and/or non-congregate) sheltering options, such as tents, vacant buildings, dormitories, campgrounds or cruise ships. Non-

⁹ Per FEMA Directive 256-22-0001, Civil Rights: Enforcement, Compliance, Integration, and Coordination – Access and Functional Needs, individuals having access and functional needs may include, but are not limited to, people with disabilities, older adults and individuals with limited English proficiency, limited access to transportation and/or limited access to financial resources to prepare for, respond to and recover from the emergency.

traditional shelters should be considered and discussed during the planning process, because they require additional monitoring and resources to address potential unanticipated problems that could arise. Weighing the availability, benefits and concerns for sheltering resources is an important part of integrated disaster housing COA development. Table 1 defines congregate and non-congregate sheltering options and provides examples of each type.

Table 1: Sheltering Examples

Shelter Type	Definition	Examples
Congregate	A safe, sanitary and secure private or public facility with large open spaces.	<ul style="list-style-type: none"> ▪ Pre-existing shelter facilities ▪ Large-venue sheltering (i.e., mega-shelters) ▪ Schools, houses of worship, community centers ▪ Retreats/Conference centers ▪ Soft-sided survivor support camps ▪ Social services shelters (e.g., homeless) ▪ All-Purpose community centers or facilities
Non-congregate	A non-traditional facility that provides individuals and households with a level of privacy higher than that of a congregate shelter.	<ul style="list-style-type: none"> ▪ Hotel, motel, trailer ▪ Dormitories/Group quarters and other vacant institutional facilities ▪ Cruise ships, recreational vessels, floating hotels ▪ Recreational vehicles ▪ Seasonal and commercial recreational camps ▪ Family and friends

When a disaster impacts thousands of people in a single community, a large, congregate shelter (sometimes referred to as a mega-shelter) may be the best way to serve them. A mega-shelter is an arena, stadium, convention center or similar high-occupancy facility that can shelter an exceptionally large population of evacuees from a major disaster.¹⁰ Mega-shelters create a “little city” where evacuees have access to services such as medical care and pharmacies, postal services, legal services, daycare and places to power electrical devices.

2.2. Temporary Housing

Temporary housing is the intermediate phase of housing assistance that covers the gap between sheltering and the return of survivors to permanent dwellings. This phase provides displaced

¹⁰ Mega-Shelter Planning Guide. International Association of Venue Managers Life Safety Council. October 1, 2010. <https://www.fema.gov/pdf/emergency/disasterhousing/mspg.pdf>.

survivors with safe, habitable and secure places to live with access to community services and the opportunity to begin the process of recovery.

Temporary housing assistance begins with financial assistance for rent, hotel or motel reimbursement and home repairs or replacement. For most incidents, this addresses most temporary housing requirements. Much of this assistance can be obtained through homeowners' insurance policies, which should be stressed as the best and first line of recovery assistance. For catastrophic disasters that destroy, damage or contaminate homes or communities to such an extent that they are uninhabitable for an extended period, additional housing options are required.

Operational planning for temporary housing begins immediately after an incident, while survivors are still in shelters, and builds off the concepts and COAs from pre-incident disaster housing plans. Temporary housing can extend from weeks to months. In catastrophic or major incidents where the damage to housing infrastructure is substantial or in rural areas where rental housing is limited, this period may be many months.

When infrastructure is not severely damaged and the number of individuals with needs is manageable, existing resources such as rental properties are the simplest, and in many ways the best, options. However, if the damage to the community's infrastructure is significant or the area is rural and rental property is unavailable, more levels of government become involved and the complexity of solutions increases. In some instances, non-congregate shelter options (e.g., family and friends, hotels, motels, trailers) may represent the best temporary housing option. Examples of temporary housing used by jurisdictions and states include the following:

- Friends and family
- Hotel, motel
- Commercial space
- Rental housing units
- Unused Federal residential properties
- Manufactured homes
- Recreational vehicles
- Temporary or alternative housing units
- Vacant apartment buildings.

Decisions made for temporary housing may have substantial implications for long-term recovery, which is once again why appropriately documenting necessary decisions, roles and responsibilities and authorities in a housing plan is imperative. Temporary housing solutions require greater involvement of the whole community. Planning for temporary housing COAs is complex, as noted in Chapter 3, Housing Considerations, and should involve many stakeholders.

2.3. Permanent Housing

The stress level of disaster survivors increases the longer they are without permanent housing. Therefore, the goal is to transition survivors from temporary to permanent housing as quickly as possible. However, identifying permanent housing relies on many factors such as availability, financial resources and aligning individuals to housing with the appropriate accommodations. Examples of permanent housing solutions include:

- Construction of kit homes
- Lease or purchase of single or multifamily homes, apartments or condominiums
- Modular, manufactured or panelized housing
- Rehabilitated single or multifamily homes
- Permanent housing construction.

Unlike sheltering and temporary housing, permanent housing depends primarily on the personal decisions and financial ability of individuals. Following an incident, available affordable and accessible rental housing in the community may be limited and will impact renters' transition to permanent housing.

Homeowners' tasks are more complex. They must decide whether they want to repair, rebuild or possibly relocate; coordinate with their insurance providers; and seek financing as needed. Local government decisions on land use, building and occupancy inspections and permits and providing wraparound or basic community services may guide homeowner decisions. A jurisdiction can expedite homeowner transitions by identifying and incorporating local government decisions impacting permanent housing into their plan. These decisions will enable communities to build back better and create more resilient homes.

Money is required to repair or rebuild. Hopefully, homeowners have insurance, but insurance may not cover all rebuilding costs. Homeowners who are inadequately insured may be at higher risk of delays in achieving permanent housing. Jurisdictions should incorporate information on applicable financial programs for homeowners, renters, nonprofits and businesses into disaster housing plans to help planners understand the situation and develop COAs. For example:

- Many states have a state housing finance agency that may have access to Federal resources such as the Community Development Block Grant Disaster Recovery (CDBG-DR) and HOME Investment Partnerships (HOME) programs, low-income housing tax credits or other programs of that nature.
- Some states, such as Florida, operate a state housing trust fund for a variety of housing purposes, including rebuilding housing following an incident.
- States can also use general funds to support permanent housing, even if they do not have a housing trust fund.

- Most importantly, state, Tribal Nation and territorial governments are conduits for many Federal disaster housing programs, including preparedness grants, as well as a host of other programs offered by various Federal departments and agencies.

Appendix A lists housing assistance programs.

3. Housing Considerations

Disaster housing plans vary by jurisdiction and the threats that jurisdiction faces. Factors such as demographics, infrastructure, geography, topography, tourism levels, businesses, government programs and jurisdictional rules and regulations all present unique challenges to jurisdictions and states. There is no “one size fits all” approach towards disaster housing.

Jurisdictions should examine lessons learned and best practices of other communities and incorporate relevant considerations into their own plans.¹¹ In addition, considerations evolve or grow as solutions transition from sheltering to temporary housing to permanent housing. Thorough discussions of these considerations during planning are critical for the success of any COA.

This section identifies some planning considerations for emergency managers and planning teams to factor into disaster housing plans, along with example questions to help frame the discussion.

3.1. Regulations and Authorities

Various statutory authorities and policies provide the basis for disaster housing assistance and can impact the availability of housing and the development of permanent housing options:

- Laws, statutes, ordinances and executive orders dictate the ability to reconstruct, repair, allocate and issue disaster housing.
- Local zoning ordinances, environmental regulations, fire codes, limitations for building in floodplains or coastal barriers and accessibility requirements must be taken into account.
- States, local governments, Tribal Nations and territories may have unique authorities that impact their emergency response activities and disaster housing programs.
- Most Federal assistance is based on authorities provided by the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (the Stafford Act), 42 U.S.C. 5121-5207; the Post-Katrina Emergency Management Reform Act of 2006 (PKEMRA), 6 U.S.C. 701 et seq.; the Disaster Recovery Reform Act of 2018 (DRRA), Pub. L. 115-254, Division D; and those of other Federal departments and agencies.

Thorough research on the regulations and authorities that impact the implementation of a disaster housing plans is critical to its viability, as each jurisdiction has unique laws and ordinances. For

¹¹ Emergency management associations such as the National Emergency Management Association (<https://www.nemaweb.org>) and the International Association of Emergency Managers (<https://www.iaem.org>) are examples of resources that can share best practices and lessons learned from other jurisdictions.

example, various HUD programs allow waivers of regulations following a Presidential Disaster Declaration. If waivers to regulations exist, then planners should document them, along with the process for obtaining them, to expedite their execution when needed.

Engaging representatives from various local, state and Federal government agencies in the planning process can help identify regulations that could delay the ability to get displaced survivors into temporary and permanent housing. Appendix B lists Federal laws, regulations and waivers to consider when writing disaster housing plans.



Regulations and Authorities Questions to Consider

- What entities have regulatory or legislative responsibilities for disaster housing within the jurisdiction?
- What is the legal basis for mutual aid agreements to provide housing assistance?
- What health and safety protocols can impact return to, and occupancy of, homes and buildings?
- What codes and ordinances (e.g., placement of temporary housing units, distance from roadways, multiple temporary housing units on property, zoning, local flood damage prevention ordinances) may need to be waived or suspended to support temporary housing solutions?

3.2. Populations

The projected number of survivors requiring disaster housing assistance and their demographics are two of the largest planning factors that influence disaster housing plans. Densely populated areas require more disaster housing resources than rural areas. For example, areas along the Gulf Coast are likely to have many displaced survivors during a hurricane, versus less densely populated inland areas. For regions with considerable population fluctuation throughout the year (e.g., summer vacationers), planning to accommodate the larger anticipated displaced populations is a best practice. Certain demographic and social characteristics also significantly impact disaster housing plans for an area: age, acute medical needs, socioeconomic status, individuals with access or functional needs, individuals with limited English proficiency (LEP) and seasonal tourists.

Collecting data from survivors immediately following a disaster will help jurisdictions better determine exact housing needs and develop optimal solutions. Strategies for collecting actionable data include developing multi-agency shelter transition teams (as outlined in the National Mass Care

Strategy¹²) or implementing a case management or case work program. Planners should establish data sharing agreements prior to an incident and include all relevant housing partners.

3.2.1. Individuals with Access and Functional Needs

The social vulnerability of communities affects sheltering, temporary housing and permanent housing options and locations. SLTT partners should factor in these demographics and engage and collaborate with FEMA regional disability integration specialists, state-designated disability integration coordinators and members from across the disability community to better understand accessible housing needs. These entities may also be able to help identify possible resources for shelter and housing for limited or extended periods.

Accessible resources, accommodations and reasonable modifications ensure housing plans and operations include individuals with disabilities and others with access and functional needs. For example, survivors with access and functional needs must often stay in proximity to their established support system, which restricts available accessible housing options. Appendix B lists the primary authorities that address accessibility requirements.

Advanced planning is essential to ensure available access and services for all survivors. Making general population shelters and temporary housing accessible to those with access and functional needs may require additional items and services, such as:

- Communication assistance and services
- Transportation and personal care assistants
- Assistance with activities of daily living
- Modifications to ensure reasonable accommodations
- Crisis counseling
- Availability of food and beverages appropriate for individuals with dietary restrictions
- Medical support
- Provisions for service and assistance animals.

Planning and executing disaster housing solutions for individuals with access and functional needs requires a combined effort of government, private sector and nonprofit agencies. In addition, these collaboration efforts help educate community members with access and functional needs about the importance of personal preparedness plans.¹³

¹² National Mass Care Strategy: <https://nationalmasscarestrategy.org/>.

¹³ A variety of resources for planners on access and functional needs is located at <https://www.fema.gov/resources-people-disabilities-access-functional-needs>.

3.2.2. Homeless and Precariously Housed Populations

Planners should also account for the needs of their community's homeless and precariously housed populations as part of the disaster housing planning process. For example, obtaining an estimate of the locality's pre-disaster homeless and precariously housed populations and the services needed to transport and shelter or house them following a disaster is imperative for the community's needs assessment. This requires engaging with the entities responsible for adult social services in their communities to better understand various government homeless assistance programs and their eligibility requirements, as well as engaging mainstream public and nonprofit agencies that have responsibilities toward parts of the precariously housed population.¹⁴

Precariously Housed Individuals or Households

These individuals are on the edge of homelessness and may be doubled up with friends and relatives or paying extremely high proportions of their resources for rent. This group is often characterized as being at imminent risk of becoming homeless.

Examples of precarious situations common to both urban and rural areas include:

- People staying with friends or family who have nowhere else to go and no resources to obtain their own housing (e.g., individuals renting rooms on a temporary basis without a formal lease agreement).
- People in institutions and treatment facilities within one week of exit who have no access to or resources for housing once released.

Some private-sector programs may be able to provide solutions, such as permanent supportive housing,¹⁵ while homeless individuals seek affordable housing. In addition, planners should research available Federal programs to assist the homeless and incorporate these into their disaster housing plan COAs as appropriate. For example, HUD's Continuum of Care program and related network of service providers may be useful resources.

3.2.3. Incarcerated Individuals

Another population to consider is the incarcerated. Incarcerated individuals are subject to the same hazards as the public. Correctional facilities are responsible for evacuating and housing their resident population, due to issues such as security and detention, for the safety of the incarcerated evacuees and protecting the public from potential escapees.

¹⁴ HUD's Homeless Assistance Programs: A Guide to Counting Unsheltered Homeless People, 2008.
https://files.hudexchange.info/resources/documents/counting_unsheltered.pdf.

¹⁵ Permanent supportive housing provides permanent housing and supportive services to individuals and families experiencing homelessness to ensure housing stabilization, maximum levels of self-sufficiency and an overall better quality of life.

Incarcerated persons are sheltered at like facilities (e.g., Federal-to-Federal, county-to-county) as available. However, some county and state prisons provide “rent out” space for Federal prisoners. These arrangements generally do not require direct involvement of a jurisdiction’s emergency planners, but planners should coordinate with facilities to confirm they have plans in place and do not need additional assistance from the local government.

3.2.4. Healthcare and Senior Facilities

Healthcare and other skilled nursing or senior facilities are also responsible for developing emergency operations and contingency plans. Many individuals in senior living complexes or assisted living facilities can be relocated to general population shelters, but temporary and permanent housing solutions must address specific requirements based on their medical needs.

These facilities often rely on assistance from the government or third parties to transport and relocate patients during disasters. Most healthcare facilities have memoranda of understanding to facilitate evacuation and temporary housing processes. Planners should factor in the resources needed to accommodate this segment of the population, as well as potential capability gaps. A good practice is for planners to follow up with nursing facilities to ensure their contingency plans are updated and contain information such as accessible transportations for evacuation to shelters or temporary housing locations.



Populations Questions to Consider

- What are the most densely populated areas in the jurisdiction?
- Does the jurisdiction’s population fluctuate throughout the year (e.g., high tourist season)?
- What is the demographic breakdown of the jurisdiction? How current are the statistics?
- Which agencies within the jurisdiction provide services to the people with access and functional needs?
- What is the homeless population in the jurisdiction? Are there plans for sheltering or housing them following a disaster?
- What portion of the community receives pre-disaster housing assistance?
- What are the estimated numbers of the community’s homeowners and renters?
- How many hospitals or medical centers are in the jurisdiction? Do they have evacuation plans in place?
- Does the disaster housing planning team have copies of evacuation plans for jails/prisons, healthcare facilities and institutions?

3.3. Natural Environment

Geography is a key contributing factor to community vulnerability. Proximity to hazard-prone areas, such as coasts, floodplains, seismic zones or potential contamination sites, directly affects the number of people requiring housing assistance and the potential duration.

Statistical and geographical information system (GIS)-based modeling approaches can assist planners in determining risk based on the natural environment. For example, Flood Insurance Rate Maps, storm surge models, wind and rain prediction models and seismic risk approaches help planners predict the areas most likely to sustain damage during certain incidents, the population that will require housing assistance and the likely types of assistance needed.

In developing pre-disaster housing plans, local planners or emergency managers should consult existing GIS analyses of their region and incorporate known topography challenges, culturally sensitive locations (e.g., tribal sacred grounds, historical sites) and other known environmental considerations into their COAs. In addition, jurisdictions can use FEMA's Emergency Management Performance Grant to fund GIS analyses to help develop disaster housing plans.¹⁶



Natural Environment Questions to Consider

- Has the jurisdiction conducted GIS modeling to determine topography and assess impacts from hazards?
- What unique environmental risks in the jurisdiction (e.g., coastal areas, floodplains, seismic zones) could result in large numbers of displaced persons or challenges with rebuilding?
- Are any cultural or historical sites in the jurisdiction governed by specific regulations?
- Would any zoning regulations hinder the ability to rebuild in certain locations due to environmental considerations?
- Does the jurisdiction have high-risk flooding areas or special flood hazard areas?
- Are threatened or endangered species or other protected wildlife or plants present in any proposed locations where land-clearing activities may be required?

¹⁶ Emergency Management Performance Grant Program: <https://www.fema.gov/emergency-management-performance-grant-program>.

3.4. Infrastructure

The viability and resiliency of infrastructure and its corresponding community lifeline(s) directly correlate to a community's resilience, including residential properties, businesses and services. Homes and businesses in flood zones, on earthquake faults and on the coastline are susceptible to certain types of disasters. Therefore, difficult decisions may need to be made at the local level about whether infrastructure can be rebuilt in certain areas.

- **Community Lifelines:** The most fundamental services in the community that, when stabilized, enable all other aspects of society to function. <https://www.fema.gov/lifelines>.

Public infrastructure and lifelines (e.g., water systems, power) are especially critical, as the loss of these assets impacts the ability of individuals to return to their communities in a timely manner. Poorly constructed or maintained buildings, inadequately maintained public infrastructure, commercial and industrial development and certain types of housing stock all increase the vulnerability of the built environment. For example, older buildings may be more susceptible to damage because they could still be adhering to the code regulations required at the time of their construction.

Planners should consult recent land surveys, local development records, building permits and census population data to better understand the condition of existing infrastructure and planned growth, based on forecasted changes to the total number of persons inhabiting their jurisdictions. This will help them more accurately document the disaster housing resources that may be required and any potential gaps in capabilities.



Infrastructure Questions to Consider

- What critical infrastructure (e.g., water/wastewater plants, healthcare systems), if damaged, could impact the ability of individuals to return to their homes?
- What are the specific building codes to which structures need to be repaired or rebuilt?
- Do planners have access to a list of key public and private infrastructure partners (e.g., power providers, utility companies) on which the jurisdiction relies?
- Have any new developments or construction occurred in the jurisdiction or surrounding jurisdiction(s) which might impact housing risks?

3.5. Housing Availability

Following a catastrophic incident resulting in many displaced survivors, temporary and permanent housing options may be limited. This situation could result from insufficient housing resources prior

to the incident, legal restrictions or damage to pre-disaster alternative housing resources. Emergency managers and planners must maintain awareness of current housing stock within their jurisdiction and identify temporary housing facilities and realistic site locations prior to an incident.

Engaging local developers, property management companies and entities such as the local Board of Realtors is one way that planners can start identifying potential housing solutions for their communities. In some cases, jurisdictions can negotiate pre-disaster contracts with the private sector to provide temporary or permanent housing. This will alleviate the need to navigate legal requirements during the height of a response to an incident. In addition, planners can discuss the possibility of relaxing or allowing temporary waivers from certain fees or requirements, such as those associated with environmental, zoning or other mandates. This is especially important for housing solutions that require delivery and installation. Planners may also want to consider establishing processes for quickly permitting and approving utility connections and sites for temporary and permanent housing. A best practice is to coordinate with local jurisdictions regarding existing building, zoning, floodplain management, codes and regulations when working on the housing plan.

Understanding current housing stock in a community and identifying potential options for disaster housing are critical to determining available resources as part of the planning process. A disaster housing plan should include a list of identified housing facilities and units as an appendix.



Housing Availability Questions to Consider

- What is the composition of the current housing stock (e.g., rentals, single-family, multifamily, short-term occupancy)?
- What percentage of the housing inventory is accessible to people with access and functional needs?
- What percentage of the housing inventory allows household pets?
- What is the percentage of homeowners and renters in the area?
- What percentage of the housing inventory is non-primary residences?
- Does the jurisdiction have temporary housing resources (e.g., temporary housing units, trailers)?
- Are agreements in place for temporary housing solutions (e.g., with neighboring jurisdictions, colleges, hotels)?
- Can building codes or zoning ordinances be waived to create additional temporary housing solutions? If so, what is the process for that?
- Does the jurisdiction have an inventory of potential areas that could support group sites?
- Does the jurisdiction have an inventory of available commercial parks and pads for lease for manufactured housing units and recreational vehicles?

- Has the planning team considered the housing needs of recovery workers and volunteers?

3.6. Contracting

Contractors are a critical force multiplier during any incident response. Jurisdictions may consider establishing pre-positioned contracts with vendors to expedite access to housing resources following an incident. As part of the planning process, emergency managers should identify any existing pre-positioned contracts and discuss the need for additional advance contracts that could help obtain housing services and resources in a timely manner. This is particularly valuable for addressing housing needs following smaller-scale emergencies where Federal resources may not be available.

PKEMRA requires FEMA to identify and establish contracts prior to an incident for frequently requested goods and services. In 2017, FEMA had an inventory of 77 advance contracts and reported that it obligated about \$2.3 billion on 57 of them for hurricane assistance—\$890 million for Harvey, \$459 million for Irma and \$945 million for Maria. Some commonly acquired products and services under these advance contracts were architect and engineering services, inspection services and prefabricated buildings.¹⁷ SLTT planners should reach out to their regional FEMA office to obtain more information or guidance on pre-positioned contracts. In addition, to assist with validating a contractor's integrity, compliance with public policy, record of past performance and financial and technical resources, jurisdictions can search the General Services Administration's System for Award Management to determine if a vendor is suspended or debarred.¹⁸



Contracting Questions to Consider

- What, if any, pre-positioned contracts exist in the jurisdiction for housing-related services?
- If any exist, have they recently been reviewed for accuracy and currency?
- If none exist, are there resource gaps where a contract should be considered?
- What contract process would be used to address housing needs?
- Does the planning team understand the requirements for Federal acquisitions?

¹⁷ 2017 Disaster Contracting: Observations on Federal Contracting for Response and Recovery Efforts. February 2018. U.S. Government Accountability Office. <https://www.gao.gov/assets/700/690425.pdf>.

¹⁸ System for Award Management: <https://www.sam.gov>.

3.7. Host State Agreements

Through mutual aid agreements, SLTT jurisdictions provide disaster-related assistance to one another. This includes sheltering and housing displaced survivors from other jurisdictions or states. For example, Florida provided sheltering and temporary housing for evacuees from Puerto Rico following Hurricane Maria. Reimbursement to host states for their efforts is either through existing mutual aid agreements (e.g., EMAC), direct reimbursement from FEMA or in response to a state's request to FEMA under the Stafford Act.

- **Host State:** A state that, by agreement with an impacted state or FEMA, is providing evacuation and sheltering support to individuals from another state.
- **Impact State:** A state, territory or Tribal Nation that has received a Presidential emergency or major disaster declaration.

Planners should identify any existing host state agreements already in place or consider establishing agreements with neighboring states during preparedness planning efforts to expand the capacity of available sheltering and temporary housing options.



Host State Questions to Consider

- Are any host state agreements in place at the state or territorial level?
- If not, should host state agreements be established?
- If an agreement exists, does it specifically address relocation of displaced individuals?
- Does the agreement specify procedures or limits to sharing information on displaced individuals (e.g., personally identifiable information)?

3.8. Wraparound Services

Providing temporary housing requires more than just providing structures. Individuals and households should be relocated to neighborhoods with reasonable access to community and “wraparound” services (e.g., schools, fire and emergency services, grocery stores, healthcare, crisis counseling, daycare, public transportation, social services, employment counseling, veterinarians).

The National Disaster Housing Strategy identifies several planning assumptions for wraparound services that emergency managers and planners should consider in their housing plans:

- Certain wraparound services are fundamental in that they meet a community's basic needs for security, restoration of private sector life support and community connectivity.

- Providing wraparound services expedites individual/family recovery plans and the identification of a more permanent housing solution.
- To the extent possible, several wraparound services may be met through assistance that enables and/or connects community nonprofit organizations' abilities and interests in meeting the needs directly.¹⁹



Wraparound Services Questions to Consider

- Have the wraparound services and the agencies or organizations responsible for providing them been identified within the jurisdiction?
- Are wraparound service providers included in disaster housing planning efforts?
- What community organizations and partners can provide support and resources?

3.9. Home and Safety Inspections

After an incident, it is likely that several types of assessment teams will be surveying damaged homes. The teams will often have different missions and objectives, though they will also have some commonalities that may help inform building safety and recovery efforts for the community.

Building safety inspections²⁰ occur first and evaluate safety and habitability for continued use and assess the need for restricted or prohibited entry. This evaluation determines safety and does not assess damage or assistance eligibility. Next, housing inspections may be required to assess damages, estimate the value of lost property and determine eligibility for certain disaster assistance programs. Following catastrophic incidents, the volume of safety evaluations and home inspections may exceed the capacity to perform these activities in a timely manner, delaying delivery of housing assistance to survivors and related recovery efforts. Planners should consider the inspections and certifications required to legally certify occupancy once a home is deemed safe and secure.

In considering how to expedite safety evaluations and housing inspections, planners should identify the existing pool of building inspectors and permitting officials available for post-disaster repair and re-occupancy. Mutual aid assistance compacts such as EMAC are force multipliers for jurisdictions. Planners should include information on additional inspection resources in their disaster housing

¹⁹ National Disaster Housing Strategy, pg. 52. <https://www.fema.gov/pdf/emergency/disasterhousing/NDHS-core.pdf>.

²⁰ Guidance for conducting inspections, including planning and implementation, can be found in FEMA P-2055 Post-Disaster Building Safety Evaluation Guidance (November 2019). https://www.fema.gov/sites/default/files/2020-07/fema_p-2055_post-disaster_buildingsafety_evaluation_2019.pdf.

plans. Visit <https://www.fema.gov/resource-management-mutual-aid> for additional information on the National Mutual Aid System and guidance for incorporating mutual aid into planning efforts.



Home and Safety Inspections Questions to Consider

- What entity is responsible for occupation and safety inspections?
- What are the available housing inspection resources within the jurisdiction?
- Does the state recognize certifications and licenses from other states?
- Are mutual aid agreements in place for additional housing inspectors?
- Can the jurisdiction streamline, simplify and expedite building permit applications and inspections?
- What is the current wait time to receive a certification of occupancy? Can this be expedited post incident?

3.10. Public Information, Outreach and Preparedness

A critical aspect of preparedness and planning efforts is identifying and transmitting accessible information that will help individuals and households prepare for potential displacement from their homes following an incident. Synchronized, proactive messaging, prior to and following an incident, encourages individuals and households to plan and react accordingly for displacement and helps alleviate some of the burden on jurisdictions.

The disaster housing planning process should include public outreach to include relevant social media platforms. Emergency managers, housing agencies and public officials should ensure residents are aware of housing resources and how to access them. For example, the State of Texas created a dedicated website for disaster housing resources following Hurricane Harvey (Figure 2).²¹

²¹ Texas Department of Housing and Community Affairs: <https://www.tdhca.texas.gov/housing-resource-center>.



Figure 2: Screenshot of the State of Texas Housing Website

Messaging about the importance of flood insurance, homeowners and rental insurance and documentation of proof of ownership (e.g., deed, title, mortgage statement) can expedite disaster assistance. Jurisdictions and states should develop a communications strategy that includes preparedness activities and messaging in alternative formats, so everyone has access to information regarding services and assistance.

This communication strategy may include sharing tools, such as fact sheets or checklists, that a state or agency has already developed. For example, FEMA's direct housing assistance website for Hurricane Harvey includes information on temporary and permanent housing for individuals and households.²² Planners can identify and even script messages on housing assistance, funding and reimbursements as part of the planning process.



Public Information, Outreach and Preparedness Questions to Consider

- What accessible communications channels have been identified to relay disaster housing information?
- Has disaster housing-related messaging already been developed within the jurisdiction?
- Who is responsible for releasing information to the public within the jurisdiction?

²² FEMA Direct Housing Assistance: <https://www.fema.gov/fact-sheet/fact-sheet-fema-direct-temporary-housing-mission-and-timeline>.

- What community organizations can help amplify housing-related messaging?
- What is the protocol to synchronize messages between local, state and Federal entities?
- Does the jurisdiction have a website or social media presence to convey disaster-related housing information?
- If not, will one be established? Who will establish, maintain and update it?

4. Housing Assistance Programs

Many government agencies and organizations have disaster housing responsibilities, capabilities and resources. Local jurisdictions, businesses and states provide the first line of housing assistance to affected individuals and households. As such, a variety of housing programs and resources exist at the SLTT levels and do not require a Stafford Act declaration.

After a Presidentially declared disaster, Federal housing programs become available to the survivors and community to begin the recovery process, including programs administered by FEMA. This is beneficial because no single program can mitigate all disaster housing challenges; however, navigating the various programs, particularly those of the Federal Government, can be difficult because of their similarities.

SLTT planners should have a broad knowledge of these programs, including their applicability, intended use, funding and reimbursement policies, population served, end-state, activation requirements and authorities. Planners should ensure that their disaster housing plans catalog the housing assistance programs and resources that are unique to their jurisdictions as well as the criteria and information for accessing them.

Appendix A provides examples of state disaster housing programs and a high-level overview of various Federal programs that help survivors find temporary and permanent housing. Annex 1 of the National Disaster Housing Strategy provides more details on these programs.

5. Developing a Disaster Housing Plan

CPG 101 provides a standardized planning process that SLTT jurisdictions can use to develop disaster housing plans that integrate and synchronize with existing operational and strategic planning products and efforts. This promotes consistency between plans and provides a familiar framework for stakeholders to engage and participate. Figure 3 depicts the Six-Step Planning Process from CPG 101.



Figure 3: Six-Step Planning Process

This section offers housing-related recommendations and best practices that SLTT jurisdictions should incorporate into their six-step planning process when developing disaster housing plans.

The Pre-Disaster Recovery Planning Guide for Local Governments is another reference when developing a disaster housing plan.²³ The housing capability transcends both response and recovery, and this document offers recovery-specific planning recommendations for planners.

5.1. Step 1: Form a Collaborative Disaster Housing Planning Team

As previously noted, disaster housing responsibilities, capabilities and resources involve a diverse array of organizations with varied missions and vested interests. No single entity has the means to address the full spectrum of disaster housing challenges. In addition, jurisdictions are all unique, with different risks, demographics and geographies and different levels of resources and capabilities to address disaster housing. Therefore, planners should identify the appropriate representatives from all levels of government, NGOs and the private sector to participate in the disaster housing

²³ Pre-Disaster Recovery Planning Guide for Local Governments: <https://www.fema.gov/sites/default/files/2020-07/pre-disaster-recovery-planning-guide-local-governments.pdf>.

planning process for a specific jurisdiction. It is important to understand what capabilities and expertise each stakeholder can bring to a jurisdiction's disaster housing solution.

In this step, planners establish the **core** and **collaborative** disaster housing planning teams.

The **core planning team** is a small group of planners or writers that takes input from the collaborative planning team and develops the products for the planning process. This group establishes the schedule, communicates with stakeholders, sets expectations, leads the planning process and develops the actual draft.

The **collaborative planning team** is a larger group of stakeholders that contributes expertise to the planning process. To ensure transparency with the community, the collaborative planning team should be as broad as possible, including:

- Representatives from various government agencies at the jurisdictional, regional, state and Federal levels that have a role in providing disaster housing or wraparound services
- Nonprofit organizations
- Local land developers and builders
- Volunteer organizations
- Disability organizations
- Faith-based organizations
- Chambers of commerce
- Organizations representing the needs of children, seniors, people with access and functional needs and people with LEP
- As appropriate, organizations representing culturally sensitive locations (e.g., tribal sacred grounds) and/or historical sites.

Table 2 provides additional examples of organizations that may be involved in disaster housing. These agencies and organizations will vary by jurisdiction. An expansive collaborative planning team establishes relationships that bring creativity and innovation to disaster housing planning.

Table 2: Example Participants for a Housing Collaborative Planning Team

Government Organizations	Private Sector/Nonprofit Organizations
<ul style="list-style-type: none"> ▪ Local elected/appointed officials (e.g., mayors, city/county managers) ▪ Emergency management and public safety (police/fire/emergency medical services) ▪ Housing finance agency ▪ Public housing authorities ▪ Building departments ▪ Planning and zoning authorities ▪ Public works departments ▪ Health and social services departments ▪ Floodplain management ▪ Environmental protection ▪ Department of Education ▪ Economic development (local and regional) ▪ Parks and Recreation ▪ Historic preservation boards or commissions ▪ Americans with Disabilities Act (ADA) coordinators ▪ Military installations ▪ ESF #6 and Housing RSF representatives (FEMA, HUD, SBA, USDA, VA) 	<ul style="list-style-type: none"> ▪ American Red Cross ▪ Voluntary organizations active in disaster ▪ Nonprofit organizations ▪ Long-term recovery groups ▪ Community development corporations ▪ Utility companies ▪ Architectural, building and safety and planning associations ▪ Insurance brokers, agents and carriers ▪ Commercial and residential construction developers ▪ Rental property representatives/associations ▪ Realtors ▪ Independent charities ▪ Education community (private) ▪ Advocacy organizations (access and functional needs, children, homeless, low-income) ▪ Chambers of commerce ▪ Faith-based organizations ▪ Media outlets ▪ Private health care and senior facilities

5.2. Step 2: Understand the Housing Situation

As noted in CPG 101, planners start the problem-solving process by researching and analyzing how a jurisdiction's threats and hazards can create potential for displaced survivors for long periods of time. Planners use pre-disaster housing inventories, populations and services as their basis for developing housing solutions, but the impacts from the event are likely to make the post-disaster inventory differ significantly.

Know Your Community

The key to determining risks, impacts and consequences is to know your community and understand what defines its identity. Using existing data from local planning documents or local community organizations, identify and map all community features, attributes, people and assets

(e.g., social, political, financial, infrastructure, public and private sector, institutional). Understanding these community features assists in hazard identification and provides a thorough understanding of the resources at the community's disposal. Examine previous disasters and their impacts and communicate to the planning team any community insights from these previous disasters.

The first step to understanding a disaster housing scenario is to conduct focused research on a broad range of characteristics of a jurisdiction, such as the size, composition and distribution of the population, as well as land use patterns, socioeconomic conditions, local government, local cultural considerations, and businesses, community groups, infrastructure conditions and other community resources. Leveraging housing data from local and national housing surveys such as the American Housing Survey (AHS) and the American Community Survey (ACS) can assist with this activity.^{24 25}

- **AHS:** Conducted every two years by the Census Bureau for HUD, the AHS measures housing quality and costs over time with a longitudinal sample cohort. The data obtained about residences and households provides valuable information that helps Federal, state and local governments plan to meet the housing needs of the Nation. The AHS covers the 50 states and Washington, D.C.
- **ACS:** Administered by the Census Bureau, the ACS collects data on an ongoing basis to provide communities with information for important decisions. The ACS covers the 50 states, Washington, D.C., and Puerto Rico.

In addition, many communities have some form of data integration center that collects and enhances information to support broader community decisions. The Greater New Orleans Data Center is an example of such an organization.²⁶ Planners can access such data tools to better determine the disaster housing needs of their communities.

This step also includes obtaining knowledge about the various regulations and laws on options for disaster housing. One tool to elicit this data is a fact sheet or questionnaire distributed to the collaborative planning team that seeks information on a variety of issues and capabilities unique to their organizations. In addition, these team members can point the planners to existing resources or data specific to the jurisdiction. For example, health officials can provide data on various elements of the population, as well as which critical health services require restoration before temporary housing structures are usable.

This is also an opportunity to assess the capabilities of the community and its broader network of resources. For example, research can help identify how many dormitory rooms would be available at

²⁴ U.S. Census Bureau, American Housing Survey: <https://www.census.gov/programs-surveys/ahs/>.

²⁵ U.S. Census Bureau, American Community Survey Data: <https://www.census.gov/programs-surveys/acs/data.html>.

²⁶ The Data Center: <https://datacenterresearch.org>.

local or regional institutions of higher learning, which new hotels or apartments are being developed and which vacant rental properties require repair.

When all research is complete, the core planning team analyzes the data to create a “scenario” that maximizes the requirements for sheltering and housing within a community. Based on the scenario, the planning team develops facts and assumptions pertaining to the housing mission.

5.3. Step 3: Determine Housing Goals and Objectives

Using information from the scenario in Step 2, the planning team considers how displaced survivors’ needs will evolve and identifies projected housing requirements. These requirements become the priorities and basis for establishing jurisdiction goals and objectives. Jurisdictions should reference the national disaster housing goals when establishing their housing goals and objectives. However, executives and elected officials of each jurisdiction may have additional goals or objectives based on the unique characteristics and vision of the community.

The core planning team develops a list of goals and objectives for disaster housing.

- **Goals** are broad, general statements that indicate the intended solution to the identified problems. They are what personnel and equipment resources are supposed to achieve.
- **Objectives** are specific and measurable and focus on actions carried out during the operation. They lead to achieving the goals and determining the actions that participants in the operation must accomplish. Translating objectives into actions is part of Step 4.

As goals and objectives are set, planners may identify more requirements that will feed into the development of COAs as well as the capability estimate (see Step 4).

5.4. Step 4: Housing Plan Development

In this step, the planning team develops operational COAs to achieve each objective. Given the complexity of disaster housing authorities, the planning team should establish a projected timeline for housing actions, ranging from sheltering through permanent housing. Using this timeline, planners can identify decision points and response actions required to achieve the objective or response goal (i.e., the desired end state). The timeline also helps determine how much time is available or needed to complete a sequence of actions. This is particularly important to help survivors move out of shelters and to return to some level of normalcy as quickly as possible.

When developing COAs, jurisdictions must understand which organization(s) have responsibility for which actions and whether those actions depend on any decisions, legal authorities or the

completion of other tasks. In addition, some housing assistance programs have timelines established in law, regulations or policies that can include deadlines for applications, completion of work, developing administrative plans, program duration or timelines for submitting extension requests or appeals. Planners should consider developing a section on key decisions and their implications.

After selecting housing COAs, the planning team develops capability estimates that identify the capabilities and resources needed to accomplish tasks. Capability estimates help planners decide whether pursuing a COA is realistic and supportable.

Once the estimates are completed, the planning team uses the information from Step 2 to identify existing disaster housing resources and any gaps or shortfalls (in direct or indirect disaster housing capabilities, resources, authorities or funding). Gaps are usually between the projected number of people requiring some form of housing assistance and the actual capacity to house them with existing resources. However, projecting actual disaster housing needs has historically been a challenge—survivors make their own choices and the length of time it takes to deliver housing solutions may impact the participation rate.

At this juncture, the planning team should start identifying housing capabilities outside the jurisdiction (e.g., regional, Federal, NGO) that can fill some of the housing shortfalls. It should also discuss the need for mutual aid agreements, host state agreements or waivers.

5.5. Step 5: Housing Plan Preparation, Review and Approval

Once the core planning team develops a draft of the plan, representatives from the collaborative planning team should review and validate the content and potentially identify additional coordination points, functions or resources.

Particularly, since roles and responsibilities for disaster housing support encompass many agencies and organizations, any errors or conflicts must be resolved and addressed prior to the plan's approval and publication. Conducting at least one stakeholder engagement period is a best practice. Refer to CPG 101 for successful strategies to facilitate input from stakeholders.

After the core planning teams reviews and adjudications of comments, the collaborative planning team members should have an opportunity for a final review of the document to ensure that all critical omissions or errors are resolved. The lead planner or emergency manager then submits the plan to the appropriate executive decision-maker for approval.

5.6. Step 6: Housing Plan Implementation and Maintenance

States typically convene housing task forces at their state emergency operations center (EOC) or a joint field office to implement the housing plan and identify actual housing solutions following an incident. During the planning process, emergency managers are encouraged to identify personnel to serve on an interagency housing task force.

Ideally, an exercise to test the viability of the housing COAs occurs prior to the plan's approval, but that is not always the case. Therefore, the emergency manager should identify exercise and training opportunities for the disaster housing plan as soon as possible following its publication.

To help emergency managers determine the qualifications that specific housing roles require, jurisdictions and states can leverage the National Qualification System (NQS) disaster housing job titles and position task books. The NQS establishes standard minimum qualifications for specific incident-related positions to provide consistency across the Nation and support nationwide interoperability.²⁷

Collaborative exercises should involve partners identified in the plan to help familiarize them with the plan and solidify a practical understanding of processes, decision points and delivery of capabilities. Tabletop exercises (TTXs) are useful tools for identifying potential resource shortfalls or plan weaknesses. Lessons learned from TTXs, other exercises or trainings inform decisions by senior leaders to make changes to the plan. The Homeland Security Exercise and Evaluation Program (HSEEP) provides a set of guiding principles for exercise programs, as well as a common approach to exercise program management, design and development, conduct, evaluation and improvement planning. Emergency managers should consult HSEEP for additional information on how exercises can assess and validate housing capabilities.²⁸

Lessons learned from real-world incidents are critical inputs to plan revisions and housing solutions. These incidents, while unfortunate, offer an opportunity to assess existing plans and identify planning or resource gaps. Partners, such as the members of a disaster housing task force, can further refine housing plans and strategies based on the execution of existing plans in the face of a real-world incident.

²⁷ Guideline for the National Qualification System. FEMA. November 2017.
https://www.fema.gov/sites/default/files/2020-05/fema_nims_nqs_guideline_0.pdf.

²⁸ Homeland Security Exercise and Evaluation Program: <https://www.fema.gov/hseep>.

State-Led Disaster Housing Task Force (SLDHTF)

At the state level, an SLDHTF is a permanent body that coordinates SLTT, Federal, NGO and private sector experts to identify and evaluate housing programs, resources and capabilities as part of the disaster housing planning effort. It primarily consists of SLTT officials who have a role in disaster housing. Following an incident, the SLDHTF:

- Activates upon initiation of the state-led housing mission
- Determines the scope of disaster-caused housing needs
- Explores available rental resources and feasible alternatives
- Identifies and implements housing solutions following an incident.

Scheduled periodic reviews, revisions and exercises of the disaster housing plan are necessary to keep it current and effective. Reviews should consider lessons learned from real-world incidents or exercises that included a disaster housing mission, new national policy or significant changes within the jurisdiction, such as government reorganizations, housing booms and shifts in demographics.

6. Glossary

Access and Functional Needs: Individuals having access and functional needs may include, but are not limited to, people with disabilities, older adults and individuals with limited English proficiency (LEP), limited access to transportation and/or limited access to financial resources to prepare for, respond to and recover from the emergency.

Agency: A government element with a specific function offering a particular kind of assistance.

Congregate Shelters: A safe, sanitary and secure private or public facility with large open spaces.

Course of Action (COA): An approach that accomplishes an objective or mission.

Emergency Operations Center (EOC): The physical location where the coordination of information and resources to support incident management activities (on-scene operations) normally takes place. An EOC may be a temporary facility or located in a more central or permanently established facility, perhaps at a higher level of organization within a jurisdiction.

Emergency Operations Plan (EOP): The ongoing plan maintained by various jurisdictional levels for responding to a wide variety of potential hazards. It describes how people and property will be protected; details who is responsible for carrying out specific actions; identifies the personnel, equipment, facilities, supplies and other resources available; and outlines how all actions will be coordinated.

Emergency Support Function (ESF): The grouping of governmental and certain private sector capabilities into an organizational structure to provide capabilities and services most likely needed to manage domestic incidents.

Host State: A state that, by agreement with an impacted state or FEMA, is providing evacuation and sheltering support to individuals from another state.

Impact State: A state, territory or Tribal Nation that has received a Presidential emergency or major disaster declaration.

Incident: An occurrence, natural or manmade, that necessitates a response to protect life or property. In this document, the word “incident” includes planned events as well as emergencies and/or disasters of all kinds and sizes.

Jurisdiction: A political subdivision (e.g., municipality, county, parish, territory, Tribal Nation, state, Federal) responsible for ensuring public safety, health and welfare within its legal authorities and geographic boundaries.

Mega-Shelter: An arena, stadium, convention center or similar very high-occupancy facility that is used to shelter an exceptionally large population of evacuees from a major disaster.

Non-congregate Shelters: A non-traditional facility (e.g., home of family or friends, trailer, hotel, dormitory, cruise ship, recreational vehicle) that provides individuals and households with a level of privacy higher than that of a congregate shelter.

Non-governmental Organization (NGO): A group that is based on the interests of its members, individuals or institutions that is not created by a government; it may work cooperatively with government. Examples include faith-based groups, relief agencies, organizations that support people with access and functional needs and animal welfare organizations.

Objective: A statement of an outcome to be accomplished or achieved. Incident objectives are used to select strategies and tactics. Incident objectives should be realistic, achievable and measurable, yet flexible enough to allow strategic and tactical alternatives.

Permanent Housing: Safe, sanitary and secure housing that can be sustained without continued disaster-related assistance.

Private Sector: Organizations and individuals that are not part of any governmental structure. The private sector includes for-profit and not-for-profit organizations, formal and informal structures, commerce and industry.

Reasonable Modification: A structural change made to existing premises, occupied or to be occupied by a person with a disability, to afford such person full enjoyment of the premises.

Shelter: A safe, sanitary and secure place that provides life-sustaining services in a congregate or non-congregate facility for individuals who have been displaced by an emergency or a disaster.

Sheltering: The provision of short-term life-sustaining services in a safe, sanitary and secure environment for disaster survivors who have been displaced from their homes and are unable to meet their own immediate post-disaster housing needs.

State: Used in this document to include any U.S. state, the District of Columbia, the Commonwealth of Puerto Rico, the U.S Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands and any U.S. possession.

State-Led Disaster Housing Task Force (SLDHTF): A permanent body that coordinates SLTT, Federal, non-governmental and private sector experts to identify and evaluate housing programs, resources and capabilities as part of disaster housing planning.

Temporary Housing: The intermediate period of housing assistance that covers the gap between sheltering and the return of disaster survivors to permanent housing. Generally, this period may span from the day after a disaster declaration through a period up to 18 months.

Temporary Housing Unit: Manufactured housing, recreational vehicle or other readily fabricated dwelling (e.g., pre-fabricated dwelling).

Wraparound Services: Infrastructure and additional essential services to address disaster-related needs of affected residents living in temporary housing sites. These services go beyond the physical need for housing or political subdivision of a state and typically include basic social services and access to utilities, transportation, grocery stores and medical and employment facilities.

7. Acronyms

ACS	American Community Survey
ADA	Americans with Disabilities Act
AHS	American Housing Survey
CDBG	Community Development Block Grant
CDBG-DR	Community Development Block Grant – Disaster Recovery
COA	Course of Action
CPG	Comprehensive Preparedness Guide
CSBG	Community Services Block Grant
DRRA	Disaster Recovery Reform Act
EMAC	Emergency Management Assistance Compact
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
ESF	Emergency Support Function
FEMA	Federal Emergency Management Agency
FHA	Federal Housing Administration
FTH	First-Time Homebuyer
GIS	Geographic Information System
HHS	Department of Health and Human Services
HMGP	Hazard Mitigation Grant Program
HOME	HOME Investment Partnerships Program
HSEEP	Homeland Security Exercise Evaluation Program

HSPD	Homeland Security Presidential Directive
HUD	Department of Housing and Urban Development
IAPPG	Individual Assistance Program and Policy Guide
LEP	Limited English Proficiency
NFIP	National Flood Insurance Program
NGO	Non-governmental Organization
NQS	National Qualification System
PKEMRA	Post-Katrina Emergency Management Reform Act
RSF	Recovery Support Function
SBA	Small Business Administration
SLDHTF	State-Led Disaster Housing Task Force
SLTT	State, Local, Tribal and Territorial
TTX	Tabletop Exercise
USACE	Army Corps of Engineers
USDA	Department of Agriculture
VA	Department of Veterans Affairs

Appendix A: Housing Assistance Programs

State and Local Housing Assistance Programs

The composition of governments in each SLTT jurisdiction differs. As a result, disaster housing programs vary across each jurisdiction. Some states and jurisdictions have dedicated housing assistance programs or resources in addition to those supplied by the Federal Government. Table 3 provides some examples of state housing programs.

As part of the planning process, planners should understand the disaster housing programs at the local, state and Federal levels, along with their purpose, scope and eligibility requirements.

Table 3: Examples of State Disaster Housing Programs

State	Program	Purpose	Link
Florida	Hurricane Housing Recovery Program	Provides funding that can be used for a wide variety of housing activities, including repairs and rehabilitation of damaged units, replacement housing, rent payment assistance and foreclosure prevention.	https://www.floridahousing.org/programs/special-programs/ship--state-housing-initiatives-partnership-program/disaster-relief
Maryland	Maryland Disaster Housing Assistance Program	Provides short-term, emergency rental assistance for families or individuals displaced by a natural disaster, as identified by the Maryland Emergency Management Agency or the Maryland Department of Human Resources, while the voucher recipient arranges for long-term housing or awaits permanent housing assistance.	www.dhcd.maryland.gov/Communities/Documents/TenantParticipationFactSheet.pdf
Massachusetts	Massachusetts Accessible Housing Registry Program	Helps people with disabilities find rental housing in Massachusetts, primarily accessible and barrier-free housing.	http://www.massachusettshousingregistry.org/

State	Program	Purpose	Link
Minnesota	Disaster Recovery Loan Program	Provides assistance as a last resort when private insurance and Federal assistance are not adequate to return a damaged home to its pre-disaster condition. The program is activated in the event of a federally declared natural disaster.	https://www.mnhousing.gov/homeownership/improve-your-home/disaster-recovery-loan-program.html
North Carolina	Back @ Home	Assistance for individuals and families who are not eligible for individual assistance through FEMA or who may be receiving limited FEMA assistance and still need help securing housing or other supportive services. Services include help finding housing, rent and utility assistance, move-in supplies and, if needed, help accessing other resources like job training and placement and child care.	https://www.backathome.org/
North Carolina	Single-Family Rehabilitation Program	Provides funding to rehabilitate owner-occupied homes in disaster-affected counties. Assistance is provided through local governments or nonprofit agencies.	https://www.nchfa.com/current-homeowners/repair-your-home/single-family-rehabilitation-program
Virginia	The Emergency Home and Accessibility Repair Program	Provides funds to remove urgent emergency health and safety hazards. It also addresses physical accessibility barriers for low-income Virginians.	https://www.dhcd.virginia.gov/eharp

Federal Housing Assistance Programs

The following sections summarize major Federal programs by department or agency that provide, or help provide, sheltering or temporary or permanent housing for individuals or households affected by a major disaster. These programs help individuals and households return to their pre-disaster state of sustainable, self-sufficient housing. More details on these programs are in the National Disaster

Housing Strategy Annex 1: Overview of Disaster Housing Programs for Federal, State, Tribal and Local Government and Nongovernmental Organizations.²⁹

Army Corps of Engineers (USACE)

Table 4: USACE Disaster Housing Program

Program	Purpose	Activation	Link
Operation Blue Roof	Provides homeowners in disaster areas with fiber-reinforced sheeting to cover their damaged roofs until arrangements can be made for permanent repairs.	Presidential emergency or major disaster declaration	https://www.usace.army.mil/Media/Fact-Sheets/Fact-Sheet-Article-View/Article/475463/temporary-roofing/

Department of Agriculture (USDA)

Table 5: USDA Disaster Housing Programs

Program	Purpose	Activation	Link
Direct Loan and Loan Guarantee Programs	Provides qualified applicants the opportunity to acquire, build, rehabilitate, improve or relocate dwellings in rural areas. Borrowers may either obtain direct loans from USDA or from private lenders that are guaranteed by USDA.	Presidential emergency or major disaster declaration	https://www.rd.usda.gov/programs-services/services/rural-development-disaster-assistance
Farm Labor Housing Direct Loans and Grants	Helps develop housing for farm workers through direct loans and grants.	Presidential emergency or major disaster declaration	https://www.rd.usda.gov/programs-services/farm-labor-housing-direct-loans-grants

²⁹ National Disaster Housing Strategy Annexes. January 16, 2009.
<https://www.fema.gov/pdf/emergency/disasterhousing/NDHS-core.pdf>.

Program	Purpose	Activation	Link
First-Time Homebuyers (FTH) and USDA Loans	Provides incentives such as a 0% down payment, lenient qualifications and low mortgage insurance to incentivize FTHs in rural areas as defined by USDA. A borrower who hasn't owned a home in the past three years may also qualify for an FTH loan.	Standing program	https://www.usdaloans.com/program/first-time-homebuyers/
Multifamily Housing Rental Assistance	Makes rental assistance payments to owners of rental housing whose houses are uninhabitable due to a disaster. Eligible tenants pay no more than 30% of their income in rent.	Presidential emergency or major disaster declaration	https://www.rd.usda.gov/programs-services/multi-family-housing-rental-assistance
Single-Family Housing Repair Loans and Grants	Provides very-low-income rural homeowners with direct loans to repair their homes.	Presidential emergency or major disaster declaration	https://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants

Department of Health and Human Services (HHS)

Table 6: HHS Disaster Housing Programs

Program	Purpose	Activation	Link
Community Services Block Grant (CSBG)	Provides block grants to states, U.S. territories and federally recognized Native American Tribal Nations following disasters, who then distribute the monies to community action agencies and other organizations serving low-income populations.	Any disaster, regardless of whether there is a Presidential emergency or major disaster declaration	https://www.acf.hhs.gov/ocs/programs/csb/g
Social Services Block Grant	Provides block grants to states, U.S. territories and federally recognized Native American Tribal Nations following disasters for the provision of social services to low-income populations.	Upon passage of a supplemental appropriations bill following a disaster	https://www.acf.hhs.gov/ocs/programs/ssb/g

Department of Housing and Urban Development (HUD)

Table 7: HUD Disaster Housing Programs

Program	Purpose	Activation	Link
Community Development Block Grant (CDBG)	Funds local community development activities such as affordable housing, economic revitalization, public services and infrastructure restoration.	Ongoing program funded by annual appropriation to HUD	https://www.hudexchange.info/programs/cdbg/
Community Development Block Grant – Disaster Recovery (CDBG-DR)	Often used as a distribution mechanism for disaster recovery funds made available by Congressional supplemental appropriations.	Supplemental appropriations made by Congress following a Presidential disaster declaration	https://www.hudexchange.info/programs/cdbg-dr/
FHA Mortgage Insurance for Disaster Victims – Section 203(h)	Provides insurance for mortgages made by qualified lenders to victims of a major disaster who have lost their homes and are in the process of rebuilding or buying another home.	Presidential emergency or major disaster declaration	https://www.hud.gov/program_offices/housing/sfh/ins/203h-dft
FHA Rehabilitation Mortgage Insurance – Section 203(k)	Helps those who have lost their homes by insuring a single, long-term, fixed or adjustable rate loan that can cover both the acquisition and rehabilitation of a property that is at least a year old.	Any disaster, regardless of whether there is a Presidential emergency or major disaster declaration	https://www.hud.gov/program_offices/housing/sfh/203k
HOME Investment Partnerships	Annual formula grants to participating jurisdictions that allow states and local governments to fund a wide range of activities that build, buy and/or rehabilitate affordable housing or provide direct rental assistance to low-income people.	Standing program	https://www.hud.gov/program_offices/comm_planning/home

Program	Purpose	Activation	Link
Housing Counseling	Provides counseling to consumers on seeking, financing, maintaining, renting or owning a home. HUD-approved housing counseling agencies have played key roles in the recovery from many disasters.	No formal activation	https://www.hudexchange.info/programs/housing-counseling/
Loss Mitigation Services for FHA Homeowners	Incorporates a process to avoid foreclosures where lenders assist borrowers who have been unable to make loan payments and are in danger of defaulting on their loans.	At the discretion of the HUD Secretary	https://www.hud.gov/program_offices/housing/sfh/nsc/lossmit
Office of Capital Improvements Capital Fund Emergency and Natural Disaster Funding	Provides funds for emergencies and non-presidentially declared natural disasters	No formal activation; case-by-case basis	https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund/emfunding

Department of Veterans Affairs (VA)

Table 8: VA Disaster Housing Programs

Program	Purpose	Activation	Link
VA Home Loans	Helps veterans, certain Service personnel (including certain Reservists and Guard members) and certain unmarried surviving spouses of veterans obtain credit to buy, build or improve homes.	At the discretion of the VA Secretary following a Presidential emergency or major disaster declaration	https://benefits.va.gov/homeloans/

Federal Emergency Management Agency (FEMA)

Table 9: FEMA Sheltering and Disaster Housing Assistance

Program	Purpose	Activation	Link
Cora Brown Fund	Helps meet disaster-related needs that have not or will not be met by governmental agencies or any other organization.	Presidentially declared major disaster or emergency not caused by or attributable to war	http://www.federalgrantswire.com/cora-brown-fund.html
Hazard Mitigation Grant Program (HMGP)	Provides grants to SLTT governments who implement long-term hazard mitigation measures that will reduce the loss of life and property due to natural disasters.	Presidential emergency or major disaster declaration	https://www.fema.gov/hazard-mitigation-grant-program-new
Individual Assistance (IA)	Through IA, FEMA provides direct assistance to individuals and households as well as SLTT governments to support individual survivors.	Presidential emergency or major disaster declaration	https://www.fema.gov/assistance/individual/program
▪ Disaster Case Management (DCM)	An IA program, DCM provides case management services, including financial assistance, to SLTT government agencies or qualified private organizations to provide such services to victims of major disasters to identify and address unmet needs.	Major disaster declaration	https://www.fema.gov/assistance/individual/disaster-survivors#case
▪ Individual and Households Program (IHP)	An IA program, IHP provides financial and direct assistance to eligible individuals and households affected by a disaster who have uninsured or underinsured necessary expenses and serious needs.	Major disaster declaration authorizing Individual Assistance	https://www.fema.gov/assistance/individual/library

Program	Purpose	Activation	Link
<ul style="list-style-type: none"> Transitional Sheltering Assistance (TSA) 	An IA program, TSA is a short-term non-congregate sheltering form of assistance for displaced disaster survivors taking refuge in emergency shelter locations other than their pre-disaster primary residence. FEMA may provide TSA at the request of a declared state, territorial or Tribal Nation government.	Major disaster declaration	https://www.fema.gov/assistance/individual/library
National Flood Insurance Program (NFIP)	Enables individuals to purchase insurance against losses from physical damage or loss of buildings and/or contents.	Standing program	http://www.fema.gov/business/nfip/

Small Business Administration (SBA)

Table 10: SBA Disaster Housing Program

Program	Purpose	Activation	Link
Disaster Loan Assistance	Provides low-interest, fixed-rate loans to disaster victims, enabling them to repair or replace property damaged or destroyed in declared disasters.	At the discretion of SBA Administrator or following a Presidential emergency or major disaster declaration	https://www.sba.gov/funding-programs/disaster-assistance

Appendix B: Authorities and References

Authorities

Each SLTT jurisdiction has unique statutes and policies that govern their housing activities. This portion of the appendix focuses on Federal authorities that jurisdictions and states should consider when developing their disaster housing plans.

NOTE: This list is not exhaustive.

- **Age Discrimination Act of 1975, 42 U.S.C. § 6101–6107:** Prohibits discrimination on the basis of age in programs and activities receiving Federal financial assistance.
- **Americans with Disabilities Act of 1990 (ADA), Public Law 101-336, as amended. 42 U.S.C. § 12101:** Prohibits discrimination on the basis of a disability and defines a person with a disability as an individual who has a physical or mental impairment that substantially limits one or more major life activities. All federally funded programs must be ADA compliant.
- **Architectural Barriers Act, as amended, 42 U.S.C. § 4151 et seq.:** Requires that all buildings and facilities designed, constructed or altered with Federal funds, or leased by a Federal agency, comply with Federal standards for physical accessibility (requirements are limited to architectural standards in new and altered buildings and in newly leased facilities). Federal funds that provide shelter or temporary or permanent housing after a disaster must comply with this act.
- **Civil Rights Act of 1964, Title VI, Public Law 88–352:** Prohibits discrimination on the basis of race, color and national origin by recipients of Federal financial assistance.
- **Civil Rights Act of 1968, Title VIII (Also known as the Fair Housing Act of 1968), 42 U.S.C. § 3601–3619:** The 1968 act expanded on the Civil Rights Act of 1964 by prohibiting discrimination concerning the sale, rental and financing of housing based on race, religion or national origin. A 1974 Amendment added sex discrimination to the list of prohibited activities and a 1988 Amendment protects people with disabilities and families with children.
- **EO 13347 – Individuals with Disabilities in Emergency Preparedness:** Ensures that the support needed by individuals with disabilities is integrated into the development and implementation of emergency preparedness plans by Federal and SLTT governments and private organizations.
- **Federal Aviation Administration Reauthorization Act of 2018 (Disaster Recovery Reform Act of 2018), Public Law 115-254, Division D:** Acknowledges the shared responsibility of disaster response and recovery and aims to reduce the complexity of FEMA and build the Nation’s

capacity for the next catastrophic event. The law contains more than 50 provisions that require FEMA policy or regulation changes for full implementation, as they amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

- **Flood Disaster Protection Act of 1973, Public Law 93-234:** Mandates the purchase of flood insurance to protect property located in special flood hazard areas.
- **Homeland Security Presidential Directive 5 (HSPD-5), Management of Domestic Incidents, 2003:** Establishes a single, comprehensive national incident management system.
- **International Code Council: International Residential Code, 2018:** Establishes minimum regulations covering all aspects of construction for one- and two-family dwellings and townhouses not more than three stories above grade.
- **National Fire Protection Association 5000: Building and Construction Safety Code, 2018:** Includes provisions to regulate and control the permitting, design, construction, quality of materials, use and occupancy and location of all buildings, structures and certain equipment.
- **National Flood Insurance Act of 1968, 42 U.S.C. 4001 et seq.:** Establishes NFIP, an insurance alternative to disaster assistance, to meet the escalating costs of repairing damage to buildings and their contents caused by floods.
- **Pets Evacuation and Transportation Standards Act of 2006, Public Law 109-308:** Amends the Stafford Act to require state and local emergency preparedness operational plans to address the needs of individuals with household pets and service animals following a major disaster or emergency.
- **Post-Katrina Emergency Management Reform Act, Public Law 109-295, Title VI:** Amends the Stafford Act with several important provisions, including that after a major disaster or emergency declaration, accelerated Federal assistance can be sent by FEMA in the absence of a specific request by a state.
- **Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.:** Section 504 prohibits discrimination on the basis of disability in any program or activity that receives Federal financial assistance, including federally subsidized housing programs.
- **Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), Public Law 93-288, as amended, 42 U.S.C. § 5121-5207: § 408(c):** Enables the Federal Government to assist states affected by a disaster to expedite the rendering of aid and emergency services and the reconstruction of devastated areas. It provides statutory authority for most Federal disaster response activities, especially as they pertain to FEMA programs, including disaster housing.

References

This section includes references to documents and websites cited throughout this guide.

- **American Housing Survey.** Census Bureau. <https://www.census.gov/programs-surveys/ahs.html>.
- **CPG 101, Version 3.** FEMA. September 2021. <https://www.fema.gov/emergency-managers/national-preparedness/plan>.
- **Emergency Management Performance Grant Program.** FEMA. <https://www.fema.gov/grants/preparedness/emergency-management-performance>.
- **HOME Investment Partnerships Program.** HUD. https://www.hud.gov/program_offices/comm_planning/home.
- **Homeland Security Exercise and Evaluation Program.** FEMA. <https://www.fema.gov/emergency-managers/national-preparedness/exercises>.
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- **National Disaster Recovery Framework, Third Edition.** FEMA. December 2024. <https://www.fema.gov/emergency-managers/national-preparedness/frameworks/recovery>.
- **Pre-Disaster Recovery Planning Guide for Local Governments.** FEMA. February 2017. <https://www.fema.gov/sites/default/files/2020-07/pre-disaster-recovery-planning-guide-local-governments.pdf>.
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- **Pre-Disaster Recovery Planning Guide for Tribal Governments.** FEMA. September 2019. <https://www.fema.gov/sites/default/files/2020-07/pre-disaster-recovery-planning-guide-for-tribal-government.pdf>.

- **Preserving Our Freedom: Ending Institutionalization of People with Disabilities During and After Disasters.** National Council on Disability, May 24, 2019.
<https://www.ncd.gov/assets/uploads/docs/ncd-preserving-our-freedom-508.pdf>.

Other References

These are additional helpful resources that have not been mentioned or referenced elsewhere in this guide.

- **FEMA Sheltering and Housing Assistance.** Provides resource information, such as links to housing strategic documents, temporary housing resources and permanent housing resources.
<https://www.fema.gov/assistance/individual/sheltering-housing-options>
- **FEMA PREPTalks Website.** PrepTalks are given by subject-matter experts and thought leaders to spread new ideas, spark conversation and promote innovative leadership for the issues confronting emergency managers over the next 20 years. <https://www.fema.gov/preptalks>.
- **HUD Counseling Disaster Recovery Toolkit.** Outlines the key actions that housing counseling agencies should take post disaster to ensure they can resume operations quickly and expand services as necessary to assist their clients in recovery.
<https://www.hudexchange.info/programs/housing-counseling/housing-counseling-disaster-recovery-toolkit/operating/>.
- **HUD Disaster Resources Website.** Provides information on HUD's disaster resources.
<https://www.hud.gov/info/disasterresources>.
- **SBA Disaster Assistance Website.** Provides information to businesses and homeowners on the various SBA disaster assistance programs. <https://www.sba.gov/funding-programs/disaster-assistance>.

Appendix C: Disaster Housing Planning Checklist

The following checklist is a tool for emergency planners to help develop their disaster housing plan. The checklist follows the suggested EOP format defined in CPG 101.

Step 1: Form the Collaborative Planning Team

- ☐ Create a work plan for the effort.
- ☐ Identify governmental, private sector and NGO entities with responsibilities or roles for developing housing solutions.
- ☐ Identify members of the core and collaborative planning teams.
- ☐ Conduct a kickoff meeting to establish the timeline, milestones and expectations.
- ☐ Determine whether these same members will participate in a housing task force to execute the plan.

Step 2: Understand the Housing Situation

Conduct Housing-Related Research and Analysis

- ☐ Understand the demographics and infrastructure in the jurisdiction, including determining the number of people with access and functional needs.
- ☐ Review results pertaining to housing from national, regional or statewide studies.
- ☐ Create a scenario to drive the planning effort (e.g., the maximum number of people to shelter, number of homes destroyed).
- ☐ Research existing roles and responsibilities by distributing surveys or fact sheets to collaborative planning team members.
- ☐ Identify the lead agency(ies) for disaster housing solutions.
- ☐ Identify mutual aid partners.

- ☐ Consider issuing a community survey to better understand local demographics and housing needs.

Planning Assumptions and Considerations

- ☐ Based on the scenario, develop assumptions (e.g., will enough resources be available, percentage of displaced survivors that will request assistance) to frame the COAs.
- ☐ Review the planning considerations in this document, as well as any additional assumptions (e.g., available resources, usable locations, permitting and utility connection processes) and complete or refine them based on the jurisdiction's needs.

REGULATIONS AND AUTHORITIES: KEY QUESTIONS TO CONSIDER

- ☐ What entities have regulatory or legislative responsibilities for disaster housing within the jurisdiction?
- ☐ What is the legal basis for mutual aid agreements to provide housing assistance?
- ☐ What health and safety protocols can impact return to, and occupancy of, homes and buildings?
- ☐ What codes and ordinances (e.g., placement of temporary housing units, distance from roadways, multiple temporary housing units on property, zoning, local flood damage prevention ordinances) may need to be waived or suspended to support temporary housing solutions?

POPULATIONS: KEY QUESTIONS TO CONSIDER

- ☐ What are the most densely populated areas in the jurisdiction?
- ☐ Does the jurisdiction's population fluctuate throughout the year (e.g., high tourist season)?
- ☐ What is the demographic breakdown of the jurisdiction? How current are the statistics?
- ☐ Which agencies within the jurisdiction provide services to people with access and functional needs?
- ☐ What is the homeless population in the jurisdiction? Are there plans for sheltering or housing them following a disaster?
- ☐ What portion of the community receives pre-disaster housing assistance?
- ☐ What are the estimated numbers of the community's homeowners and renters?
- ☐ How many hospitals or medical centers are in the jurisdiction? Do they have evacuation plans in place?

- ☐ Does the disaster housing planning team have copies of evacuation plans for jails/prisons, healthcare facilities and institutions?

NATURAL ENVIRONMENT: KEY QUESTIONS TO CONSIDER

- ☐ Has the jurisdiction conducted GIS modeling to determine topography and assess impacts from hazards?
- ☐ What unique environmental risks in the jurisdiction (e.g., coastal areas, floodplains, seismic zones) could result in large numbers of displaced persons or challenges with rebuilding?
- ☐ Are any cultural or historical sites in the jurisdiction governed by specific regulations?
- ☐ Would any zoning regulations hinder the ability to rebuild in certain locations due to environmental considerations?
- ☐ Does the jurisdiction have high-risk flooding areas or special flood hazard areas?
- ☐ Are threatened or endangered species or other protected wildlife or plants present in any of the proposed locations where land-clearing activities may be required?

INFRASTRUCTURE: KEY QUESTIONS TO CONSIDER

- ☐ What critical infrastructure (e.g., water/wastewater plants, healthcare systems, schools), if damaged, could impact the ability of individuals to return to their homes?
- ☐ What are the specific building codes to which structures need to be repaired or rebuilt?
- ☐ Do planners have access to a list of key public and private infrastructure partners (e.g., power providers, utility companies) on which the jurisdiction relies?
- ☐ Have any new developments or construction occurred in the jurisdiction or surrounding jurisdiction(s) which impact housing risks?

HOUSING AVAILABILITY: KEY QUESTIONS TO CONSIDER

- ☐ What is the composition of the current housing stock (e.g., rentals, single-family, multifamily, short-term occupancy)?
- ☐ What percentage of the housing inventory is accessible to people with access and functional needs?
- ☐ What percentage of the housing inventory allows household pets?
- ☐ What is the percentage of homeowners and renters in the area?
- ☐ What percentage of the housing inventory is non-primary residences?

- ☐ Does the jurisdiction have temporary housing resources (e.g., temporary housing units, trailers)?
- ☐ Are agreements in place for temporary housing solutions (e.g., with neighboring jurisdictions, colleges, hotels)?
- ☐ Can building codes or zoning ordinances be waived to create additional temporary housing solutions? If so, what is the process for that?
- ☐ Does the jurisdiction have an inventory of potential areas that could support group sites?
- ☐ Does the jurisdiction have an inventory of available commercial parks and pads for lease for manufactured housing units and recreational vehicles?
- ☐ Has the planning team considered the housing needs of recovery workers and volunteers?

CONTRACTING: KEY QUESTIONS TO CONSIDER

- ☐ What, if any, pre-positioned contracts exist in the jurisdiction for housing-related services?
- ☐ If any exist, have they recently been reviewed for accuracy and currency?
- ☐ If none exist, are there resource gaps where a contract should be considered?
- ☐ What is the contract process that would be used to address housing needs?
- ☐ Does the planning team understand the requirements for Federal acquisitions?

HOST STATE AGREEMENTS: KEY QUESTIONS TO CONSIDER

- ☐ Are any host state agreements already in place at the state or territorial level?
- ☐ If not, should host state agreements be established?
- ☐ If an agreement exists, does it specifically address relocation of displaced individuals?
- ☐ Does the agreement specify procedures or limits to sharing information on displaced individuals (e.g., personally identifiable information)?

WRAPAROUND SERVICES: KEY QUESTIONS TO CONSIDER

- ☐ Have the wraparound services and the agencies or organizations responsible for providing them been identified within the jurisdiction?
- ☐ Are wraparound service providers included in disaster housing planning efforts?
- ☐ What community organizations and partners can provide support and resources?

HOUSING INSPECTIONS: KEY QUESTIONS TO CONSIDER

- ☐ What entity is responsible for occupation and safety inspections?
- ☐ What are the available housing inspection resources within the jurisdiction?
- ☐ Does the state recognize certifications and licenses from other states?
- ☐ Are mutual aid agreements in place for additional housing inspectors?
- ☐ Can the jurisdiction streamline, simplify and expedite building permit applications and inspections?
- ☐ What is the current wait time to receive a certification of occupancy? Can this be expedited post-incident?

PUBLIC INFORMATION, OUTREACH AND PREPAREDNESS: KEY QUESTIONS TO CONSIDER

- ☐ What accessible communications channels have been identified to relay disaster housing information?
- ☐ Has disaster-housing-related messaging already been developed within the jurisdiction?
- ☐ Who is responsible for releasing information to the public within the jurisdiction?
- ☐ What community organizations can help amplify housing-related messaging?
- ☐ What is the protocol to synchronize messages between local, state and Federal entities?
- ☐ Does the jurisdiction have a website or social media presence to convey disaster-related housing information?
- ☐ If not, will one be established? Who will establish, maintain and update it?

Step 3: Determine Housing Goals and Objectives

- ☐ Review the goals from the National Disaster Housing Strategy.
- ☐ Verify with senior officials (elected or appointed) any additional housing goals that are unique to the jurisdiction.
- ☐ Conduct a working session with the collaborative planning team to map out a framework for each goal (goal; objective; actions).
- ☐ Develop COAs for each objective.

- ☐ Determine the measure(s) of success for each objective.
- ☐ Discuss the jurisdiction's capability to achieve the objectives, including discussing strengths and weaknesses of staffing, funding and resources.
- ☐ Identify housing capability gaps and solutions for closing them.

Step 4: Housing Plan Development

Purpose, Scope, Situation Overview and Planning Assumptions

PURPOSE

- ☐ Indicate the reason a disaster housing plan is necessary in context of the jurisdiction or state.
- ☐ State what the plan is intended to accomplish.

SCOPE

- ☐ Clearly indicate when sheltering and housing phases are anticipated to transition from sheltering to temporary housing to permanent housing.

SITUATION OVERVIEW

- ☐ Describe the unique characteristics of the jurisdiction or state (e.g., population, demographics, geography, socioeconomic factors, infrastructure) and what impact they have on its ability to provide disaster housing.
- ☐ Explain the roles and responsibilities of key organizations (from research in Step 2).

PLANNING ASSUMPTIONS

- ☐ Include the list of planning assumptions specific to sheltering, temporary housing or permanent housing

Concept of Operations

SHELTERING

- ☐ Identify and describe the agencies and their actions to identify, open and staff emergency shelters, including the temporary use of reception centers while waiting for shelters to officially open.

- ☐ Describe mutual aid agreements that are in place with other jurisdictions for receiving sheltering assistance, including providing shelters when it is not practical to do so locally.
- ☐ Describe the conditions (e.g., snow emergencies, chemical incidents, pandemics) under which in-place and non-congregate sheltering (e.g. trailer, hotel) will be used. Identify which agencies will support these operations and how they will determine when to implement these operations.
- ☐ Describe how the jurisdiction will ensure the physical and programmatic accessibility of shelter facilities, effective communication using multiple methods, full access to emergency services and reasonable modification of programs or policies where needed.
- ☐ Describe how shelters will coordinate their operations with on-site and off-site support agencies.
- ☐ Identify and describe the agencies and their actions to inform the public about sheltering-in-place (e.g., implementation, updates and termination).
- ☐ Describe the plans, methods and agencies/organizations responsible for distributing emergency relief items (e.g., hygiene kits, cleanup items, infant care supplies).
- ☐ Identify and describe the agencies/organizations and their methods to provide feeding services, both within the shelter facilities and at other identified feeding sites or mobile feeding operations.
- ☐ Identify and describe the agencies and their actions to provide short-term lodging and other mass care needs (e.g., beds/cots, food/water, crisis counseling, phones, clergy support, household pet/service animal support).
- ☐ Identify and describe the agencies and their methods to provide care and support for institutionalized populations, children and individuals with access and functional needs, including their caregivers.
- ☐ Identify and describe the actions to ensure that ADA Accessibility Guidelines govern shelter site selection and operation.
- ☐ Describe the method to provide necessary developmentally appropriate supplies (e.g., diapers, formula, age-appropriate foods), staff, medicines, durable medical equipment and supplies needed during an emergency for children and those with access and functional needs.
- ☐ Describe the mechanisms or processes for handling and providing services for unaccompanied children in shelters.
- ☐ Describe the method to provide guidance on the admission and treatment of service animals.
- ☐ Identify and describe the agencies and their actions to identify, screen and handle evacuees exposed to hazards from a disaster (e.g., infectious waste, polluted floodwaters, chemical hazards) and to keep the shelter free of contamination.

- ☐ Describe how shelters inform evacuees about incident status, including actions that shelter residents may need to take when they return home.
- ☐ Identify and describe the agencies and their actions to notify and inform the public about the status of injured or missing relatives.
- ☐ Identify and describe the agencies and their actions to care for household pets and service animals that are brought to shelters.
- ☐ Describe the method for household pet registration, including identification of a current rabies vaccination for all animals.
- ☐ Describe the method to reunite rescued animals with their owners.
- ☐ Identify and describe the actions to address the long-term care, permanent relocation or disposition of unclaimed pets.

TEMPORARY HOUSING

- ☐ Identify and describe the agencies/organizations who have the lead for temporary housing.
- ☐ Identify the wraparound services that need to be in place to enable temporary housing solutions (varies by jurisdiction).
- ☐ Identify utility connection processes and the responsible party for each step.
- ☐ Identify potential waivers or payment plans for utility connections for applicants with past due accounts.
- ☐ Identify and coordinate with private sector utility companies to expedite inspections and connections.
- ☐ List the inventory of potential temporary housing solutions. Include those within the jurisdiction and within neighboring jurisdictions or states (within a reasonable commuting time).
- ☐ Include a list of programs that can provide rental assistance.
- ☐ Address a surge plan for building inspectors/permit officials. Explore mechanisms to increase staffing/capability for local code enforcements and inspections.
- ☐ Determine the need for any post-disaster expedited approval processes for waiving ordinances to accommodate temporary housing.
- ☐ Develop a contract template to use should emergency repairs be needed to public facilities necessary for housing.

- ☐ Determine whether the state currently inventories rental properties. If yes, ensure that buildings can accommodate people with access and functional needs in accordance with the Architectural Barriers Act/ADA.
- ☐ Identify the number of houses and housing units in the special flood hazard area.
- ☐ Determine if the state has agreements with other states to host evacuees on an interim basis and provide health, social services, education and child-care access if need exceeds capacity.
- ☐ Create an inventory of commercial recreational vehicle and manufactured housing pads and parks, including availability status.
- ☐ Describe the plan to compile damage assessments.
- ☐ Identify what types of temporary housing units can be used within the jurisdiction or state and communicate that to FEMA.
- ☐ Determine if a communications plan is in place to distribute information on housing assistance.

PERMANENT HOUSING

- ☐ Identify permanent housing vacancy rates and fair market rates for a range of housing sizes across the jurisdiction.
- ☐ Identify sites where temporary housing can be converted to permanent housing.
- ☐ Consider ordinances that:
 - ☐ Allow temporary housing units such as manufactured housing units on private property.
 - ☐ Allow or temporarily remove restrictions on auxiliary housing units in single-family neighborhoods.
 - ☐ Specify how environmental and historic resources will be protected when permanent housing is placed on private and/or public property.
 - ☐ Permit electrical connection in the absence of a building permit so that repair work can begin; the electrical connection permit might indicate that all work must be brought into compliance with existing codes.
- ☐ Establish a limited building permit that will allow limited repairs to prevent further damage to a structure.
- ☐ Identify surge resources that are available following a disaster to assist with reviewing building permits and design/repair submittals to ensure compliance with the latest building codes, standards and ordinances.

- ☐ Plan to make accommodations for individuals with access and functional needs.

Direction, Control and Coordination

- ☐ Describe plan leadership and oversight.
- ☐ If a Housing Task Force will execute the plan, describe the composition, roles and responsibilities and triggers for activating and deactivating it.
- ☐ Provide a clear unity of command when involving multiple organizations and multiple incident scenes.

Communications

OPERATIONAL COMMUNICATION

- ☐ Identify a mechanism to ensure timely, accurate and consistent disaster housing messaging across disciplines and jurisdictions.
- ☐ Identify support organizations, capabilities and teams to establish effective and continuous interoperable communication, including cellular communications.

PUBLIC INFORMATION AND WARNING

- ☐ Provide a coordinated joint approach to deliver timely, accurate, accessible and consistent messaging in multiple formats on disaster housing.
- ☐ Address messaging and distribution mechanisms to account for the demographics and resources of the jurisdiction.
- ☐ Address the use of social media to distribute public information rapidly to prevent inaccurate or misleading information.

Administration, Finance and Logistics

- ☐ Identify administrative controls to provide resource and expenditure accountability.

Preparedness, Mitigation and Recovery

- ☐ Incorporate short-term, interim and long-term recovery strategies/objectives.
- ☐ Address how to implement support plans for survivors and families of the deceased.
- ☐ Include strategies to implement the RSFs after the incident.

- ☐ Account for those with access and functional needs in recovery planning efforts.
- ☐ Outline remediation procedures for damaged or hazardous sites.

Implementation, Maintenance and Training

- ☐ Identify the agency responsible for updating and maintaining the plan.
- ☐ Identify applicable available disaster housing training and exercises.
- ☐ Identify/summarize how and to whom the plan is distributed; indicate whether it is shared with the public.
- ☐ Include a schedule to review and revise the plan.
- ☐ Identify the process used to review and revise the plan.
- ☐ Include all partners involved in the annex development in the plan's maintenance and training schedule.
- ☐ Outline the responsibility of partners to review and provide changes to the plan; identify the process to provide feedback.

Authorities and References

- ☐ Include a list of the relevant authorities.
- ☐ Include links to applicable references and guidance.

Step 5: Housing Plan Preparation, Review and Approval

- ☐ Release the document for at least one formal comment period.
- ☐ Conduct adjudication session(s) with the housing collaborative planning team.
- ☐ Ensure concurrence of agencies/organizations on the collaborative planning team.
- ☐ Obtain approval of senior leaders of agencies with primary responsibilities for housing.

Step 6: Housing Plan Implementation and Maintenance

- ☐ Execute a rollout strategy communicating the release and availability of the plan to key stakeholders.
- ☐ Conduct training on the housing plan.
- ☐ Identify opportunities to exercise the housing plan.
- ☐ Identify and address training gaps identified through real-world events, exercises and routine plan reviews.
- ☐ Update the plan based on lessons learned.
- ☐ Conduct periodic reviews as identified within the housing plan.