

Tribal Pathways for Disaster Assistance

Before requesting a disaster declaration, a Tribal Nation may consider whether to seek assistance on their own or be included in a state declaration as a recipient or subrecipient.

What are the three pathways for disaster assistance?

When requesting an emergency or major disaster declaration, Tribal Nations have the option to seek assistance as a (1) Tribal Declaration, (2) recipient through a state declaration, or (3) subrecipient through a state declaration.

Tribal Nations can be a direct recipient for one type of assistance (Public Assistance or Individual Assistance) and receive another type of assistance through a state declaration. For more information, refer to [FEMA's Tribal Declarations Interim Guidance](#).

Selecting a choice among available pathways for requesting a major disaster or emergency declaration depends on several factors, summarized in the tables below. These tables do not encompass all considerations that a Tribal Nation may evaluate before deciding which option meets the needs of their community.

Table 1: Evaluating Pathways for Disaster Assistance

	(1) Tribal Declaration	(2) State Declaration when a Tribal Nation is a Recipient	(3) State Declaration when a Tribal Nation is a Subrecipient
Description	A non-federal entity (i.e., Tribal Nation) that receives a federal award directly from FEMA.	A Tribal Nation covered through a state declaration that receives a federal award directly from FEMA.	A non-federal entity (i.e., Tribal Nation) that receives FEMA assistance in the form of a subaward from a pass-through entity (e.g., a state).
Who receives the Declaration Letter from the President?	Tribal Nation receives letter from the President.	State receives letter from the President.	State receives letter from the President.
Who pays the non-federal cost share (25%) for Public Assistance (PA)/Hazard Mitigation Grant Program (HMGP)?	25% paid by Tribal Nation. *	25% paid by Tribal Nation. *	The state, as a recipient for PA and HMGP, determines how the 25% cost share is passed through to the Tribal Nation. The Tribal Nation may be able to discuss this arrangement with the state prior to deciding whether to be a recipient or subrecipient.



	(1) Tribal Declaration	(2) State Declaration when a Tribal Nation is a Recipient	(3) State Declaration when a Tribal Nation is a Subrecipient
Who pays the non-federal cost share (25%) for Other Needs Assistance (ONA) under Individual Assistance (IA)?	25% paid by the Tribal Nation.	If a Tribal Nation is included through the state designation for IA, the state is responsible for the non-federal share for ONA under IA to FEMA. The Tribal Nation should discuss responsibility to cover the cost share with the state.	If a Tribal Nation is included through the state designation for IA, the state is responsible for the non-federal share for ONA under IA to FEMA. The Tribal Nation should discuss responsibility to cover the cost share with the state.
Is a FEMA-Tribe Agreement required?	Yes.	Yes (will not apply to state).	No. All subrecipients are covered by the FEMA-State Agreement as a local entity. There may also be a State-Tribal Agreement, as required by applicable laws.
What is the PA Minimum Damage Amount?	\$100,000 minimum damage amount to request a Joint Preliminary Damage Assessment (PDA).	State subject to \$1 million minimum damage amount, in addition to a per capita indicator that is updated annually.	State subject to \$1 million minimum damage amount, in addition to a per capita indicator that is updated annually.
Who will the Federal Coordinating Officer (FCO) work with?	FCO works directly with the Tribal Coordinating Officer (TCO) / Tribal Chief Executive's Authorized Representative. Direct recipients have a direct relationship with FEMA.	One FCO will be designated to work with the State Coordinating Officer and the Tribal Chief Executive's Authorized Representative. As a tribal recipient, the Tribal Nation will designate a respective TCO and Tribal Chief Executive's Authorized Representative to coordinate with FCO. Recipients through a state declaration have a direct relationship with FEMA.	One FCO, one State Coordinating Officer, and a Governor's Authorized Representative will work with all entities under the disaster declaration. As a subrecipient the Tribal Nation will not have a separate FCO designated. The FCO designated for the State declaration remains the Regional Administrator's representative for addressing Nation-to-Nation communication requirements and is responsible for ensuring assistance is provided in a fair manner to Tribal Nations.

*Tribal Nations that have received their own disaster declaration can seek cost share adjustments for PA based on their specific disaster circumstances. Tribal Nations, who are recipients through a state declaration, may seek their own federal cost share adjustments separately from the state. However, Tribal Nations that are subrecipients through a state declaration are not able to seek their own cost share adjustments separately from the state.

Table 2: Plan Requirements for Tribal Nations through Different Pathways:

	(1) Tribal Declaration	(2) State Declaration when a Tribal Nation is a Recipient	(3) State Declaration when a Tribal Nation is a Subrecipient
Program	Plans Required	Plans Required	Plans Required
PA Emergency Work (Categories A-B)	N/A	N/A	N/A
PA Permanent Work (Categories C-G)	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ PA Administrative Plan 	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ PA Administrative Plan 	N/A
HMPG Planning Grant	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ HMGP Administrative Plan 	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ HMGP Administrative Plan 	N/A
HMGP Project Grant	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ HMGP Administrative Plan 	<ul style="list-style-type: none"> ✓ Tribal Mitigation Plan ✓ HMGP Administrative Plan 	✓ Tribal Mitigation Plan*
IA Housing Assistance	N/A	N/A	N/A
IA ONA (FEMA Administered)	<ul style="list-style-type: none"> ✓ ONA Administrative Option Selection Form 	N/A	N/A
IA ONA (Joint or Tribal Nation Administered)	<ul style="list-style-type: none"> ✓ ONA Administrative Option Selection Form ✓ Tribal Nation Administrative Plan 	N/A	N/A

* The FEMA Regional Administrator may grant an exception to the plan requirements for subrecipients in extraordinary circumstances when the appropriate justification is provided. More information can be found in the [Hazard Mitigation Assistance Program and Policy Guide](#).