



# Substantial Damage Checklist

## SDE AND 1206 FUNDING CHECKLIST

Follow the steps below to conduct substantial damage activities and apply for Section 1206 Funding:

- 1 Contact your FPA and Building Official and Review your Substantial Damage Administrative Procedures
  - Locate your Substantial Damage Administrative Procedures
  - Determine if your Community's current ordinance identifies your Substantial Damage process
- 2 Request Data Analytics (NFIP Claims and Individual Assistance Data) from FEMA and sign the Information Sharing Agreement
  - Check if your community's Information Sharing Agreement (ISA) is up to date
  - Review the names listed on your ISA to ensure all are still valid authorized users. If not, your community needs to submit an updated request to FEMA to add/change any contacts on your current ISA to reflect current roles and responsibilities
- 3 Approximate the number of structures in the Special Flood Hazard Area (SFHA) that are likely damaged and determine the number of teams and the length of time required to conduct Substantial Damage Estimates (SDE)
  - Determine where Substantial Damage assessments must occur by monitoring impact areas closely. Use NFIP claims, IA information, and damage assessments
  - Ensure structure owners DO NOT start build/rebuilding until after assessments
    - FEMA estimates the time most homeowners will start to repair damaged areas is 7 days after an event
  - Calculate resources and staff needed:
 

Number of Homes
x
Number of Minutes Inspection Team(s) Need per Home
÷
Number of Teams
=
Number of Hours

    - Remember that it is the responsibility of the community to monitor all development and repair in the SFHA
- 4 Determine if you have the internal capacity to complete these assessments. If not, request assistance via mutual aid or vendor
  - Make a list of allocated staff members for SDE assessment teams
  - Review all available mutual aid agreements (if applicable)
  - Establish working relationships with Emergency Manager and State Floodplain Specialist to be able to request assistance if needed
- 5 Conduct SDEs
  - Train for SD/SI before heading out into the community
    - Train staff on collection of data (software used, precautions to take out in the field, and High-Water Mark Collection)
    - Review substantial damage regulations and definitions used by the community
    - Have documentation of previous substantial damage and substantial improvement determinations made by the community for consistency
    - Develop a list of properties with a general description of buildings that have the potential to be substantially damaged
  - Perform SD Estimates
    - Make sure teams are using same standards and methods

Current as of 07/2024



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## 6 Send letters to residents informing them of probable Substantial Damage Determination

- What methods will be used to communicate about substantial damage?
  - A community public meeting on substantial damage and mitigation options kiosks, etc.
  - Distribution of handouts or letters to property owners
  - Communication with elected officials about community responsibilities regarding substantial damage and, if applicable, about cumulative substantial damage
- Consider what information is required to be in your letters

## 7 Monitor development within the floodplain (SFHA) to ensure enforcement actions are taken

- Work with code enforcement to regularly survey identified structures for work being done
- Initiate stop work orders if needed
- Initiate code compliance cases if needed
- Document all actions taken on any development in the SFHA

## 8 Complete permit reviews

- If there will be an influx of permits, consider if the workload will be unrealistic for staff or not enough for structures identified
- Require permits and enforce the floodplain ordinance by requiring substantially damaged structures to be brought into compliance
  - Permits for repairs can be issued for any structures that are determined to not be substantially damaged

## 9 If your community will be seeking reimbursement under Public Assistance Category G (i.e., Section 1206), gather documentation for PA project and process accordingly within 180 days after the declaration

- To receive reimbursement, communities must submit all supporting documentation necessary to demonstrate the work completed and the location of the work:
  - All documentation associated with work completed through Emergency Mutual Assistance Compact (EMAC)
  - Resource request or interstate/interlocal mutual aid request
  - Work performed by contract labor
  - All documentation demonstrating federal procurement rules in 2 Code of Federal Regulations Part 200 were followed
- FEMA may also require that communities provide documentation demonstrating that the eligible activities are in support of the community's legally adopted building code or floodplain management ordinance. This may include:
  - Floodplain management ordinance administration and enforcement documentation
  - Disaster-related development inspections
  - Substantial damage (SD) inspections, determinations, letters, and appeals

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