

GUIDED COMMUNITY **SELF ASSESSMENT**

Does your community have a Substantial Improvement/Substantial Damage (SI/SD) process in place? What about some of these components: permitting, formal outreach, trained assessors? Completing this SI/SD guided self-assessment can help your community determine if its current strategies comply with regulations, as well as consideration for additional strategies to get residents the information they need to get back in their homes as quickly as possible.

The guided self-assessment includes questions pertaining to each of the major steps in the SI/SD determination process. If you have everything in place, this can be a good double-check. If your communities do not have this information, it is worth continuing the assessment. Start with where you are, and this will help you determine what you may want to address moving forward.



TOPICS

1

RECOGNIZING REGULATORY & LEGISLATIVE AUTHORITY

This section is for identifying what regulatory authority your community has and may need to complete the SI/SD process. If your community is in the NFIP, an ordinance needs to be adopted.

2

COMMUNITY ENGAGEMENT & THE CURRENT STRUCTURE

You may already have structures in place for permitting and outreach; this section is to review what you have.

3

DETERMINING IMPACT AREA

The purpose of this step is to think about what you will use as a base (maps, list of addresses in the floodplain, or otherwise) to figure out the extent of the impact.

4

IDENTIFYING AVAILABLE PERSONNEL

This is a critical step to think through any size disaster: who can manage the teams, complete the assessments, input the data, and analyze for consistency. Do they have the training and contracts in place to do so?

5

DETERMINING TIMEFRAMES

Based on the people, training, and extent of damage, this section includes guidance about how to estimate how long the process will take and what thresholds you will use to maximize efficiency and get your residents information quickly.

6

ESTABLISHING SUBSTANTIAL IMPROVEMENT/SUBSTANTIAL DAMAGE DETERMINATION & METHODOLOGY

Whether you use FEMA's Substantial Damage Estimator (SDE) Tool or some other process, this section is to look at how you can consistently set up and implement an SI/SD determination process in your community.

7

COMMUNICATING DAMAGE TO PARTNERS (LOCAL/STATE/FEDERAL)

This section includes guidance on when and how your community will coordinate with Federal, State, and other local partners.

8

COMMUNICATING SUBSTANTIAL IMPROVEMENT/DAMAGE INFORMATION TO PROPERTY OWNERS

It is important to identify how your community will communicate SI/SD information to property owners.

9

MONITORING & REINTEGRATION

This is the last part of the "emergency permitting and development" process and includes guidance on how your community can return to the day-to-day after disaster support demobilizes.

1 RECOGNIZING REGULATORY & LEGISLATIVE AUTHORITY

Structures located in Special Flood Hazard Areas (SFHAs) that are substantially modified (either damaged or improved) more than 50 percent are required to comply with local building and floodplain requirements. Local community officials (typically floodplain administrators) are responsible for substantial improvement and damage (SI/SD) determinations. These determinations are required for participation in the National Flood Insurance Program (NFIP).

When property owners invest more than 50 percent of the structure value in repair or improvement activities, it is an opportunity for community officials and floodplain administrators to encourage greater compliance with the NFIP. More than 21,000 communities participate in the National Flood Insurance Program (NFIP) by adopting and enforcing regulations and codes that apply to development in SFHAs. While this document references flooding, substantial modification to a structure in the SFHA could be caused by fire, wind damage, or other hazards as well. Local floodplain management regulations and codes contain minimum NFIP requirements that not only apply to new structures but are also for existing structures with proposed “substantial improvements” or repair of “substantial damage.”

This section is for identifying what legislative and/or regulatory authority your community has and may need to complete the SI/SD process. Legislative authority refers to your power to enact statutes that will provide for the regulation of the SI/SD process in your community. It is important to understand what authority you have so that you can understand where and how your ordinances can affect and regulate the SI/SD process. Do you know what the legal requirements are and how they apply to structures in and outside of the floodplain? Please also keep in mind that the SI/SD process will need to be implemented regardless of whether property owners are applying for permits.

WHAT AUTHORITY DO YOU HAVE FOR SI/SD?				
DOCUMENT	YES/ NO	RESPONSIBLE DEPARTMENT	WHEN WAS IT LAST UPDATED?	NEED FOR IMPROVEMENT?
Building Codes				
Floodplain Ordinance(s)				
Zoning/Land Use Ordinance(s)				

1 RECOGNIZING REGULATORY & LEGISLATIVE AUTHORITY

**THERE ARE OTHER DOCUMENTS THAT MAY HELP AS WELL.
DO YOU HAVE ANY OF THE FOLLOWING LISTED BELOW?**

PROCESS OR DOCUMENT	YES/ NO	WHEN WAS IT LAST UPDATED?	NEED FOR IMPROVEMENT?
Standard Operating Procedures related to SI/SD support			
Ordinance development and enacting procedure(s)			
Emergency ordinance development and enacting procedure(s)			
Permitting procedure(s)			
Emergency permitting procedure(s)			
Ordinance and permitting enforcement procedure(s)			
Documentation of pre-and post-FIRM structures within any SFHAs			
Tracking ongoing activities with SI/SD determinations outside of incidents			
Coordinating data collection with the recovery staff and conducting Emergency Public Assistance (PA) Program Assessments (State/local)			
Coordinating data collection with the recovery staff conducting Emergency Individual Assistance (IA) Program Assessments (State/local)			

When thinking about how your community will respond to a disaster, it is good to think about the resources you have or may be able to access. For instance, do you have agreements with neighboring towns? What Memorandums of Understanding (MOUs) do you currently have in place? Understanding these will help identify additional resources to plug in. Are there any other stakeholders that could provide assistance?

1 RECOGNIZING REGULATORY & LEGISLATIVE AUTHORITY

ARE THERE ANY OTHER STAKEHOLDERS THAT COULD PROVIDE ASSISTANCE?		
POSITION AVAILABLE	AGREEMENT TYPE (MEMORANDUM OF UNDERSTANDING, VOLUNTEER, CONTRACT, STATE EMERGENCY ASSISTANCE COMPACT, OTHER?)	TRAINED TO CONDUCT SD ASSESSMENTS?
Neighboring municipality floodplain administrator(s) & staff		
Neighboring municipality building inspector(s) & staff		
County Staff		
State Association of Floodplain Managers		
Third Party Contractors		
Community Emergency Response Teams (CERT)		
Voluntary Organizations Active Disaster (VOAD) inspection staff		

2 COMMUNITY ENGAGEMENT & THE CURRENT STRUCTURE

You may already have structures in place for permitting and outreach. This section reviews what you have pre-event. How often do you educate your community about floodplain management and building codes/permits? If the answer is never or not recently, we encourage you to look at some outreach methods that you can implement. Having an informed public may decrease the questions and confusion during the disaster. Informing the public about the SI/SD determination requirements may increase home and business owners' ability to make informed decisions when applying for permits. Remember: Enforcing your floodplain ordinance is required to participate in the NFIP.

PERMITTING AND OUTREACH		
COMMUNICATING SI/SD INFORMATION TO STRUCTURE OWNERS	YES	NO
Permit staff/inspectors trained and familiar with the SI/SD requirements		
Permit application forms are specifically designed to capture information about work proposed for buildings in SFHAs		
Handouts are approved to display at hardware, building supply, & equipment rental stores, local insurance agencies, and churches and community centers explain floodplain requirements, including the SI/SD requirements		
Coordination with local/regional builder groups		
Local SI/SD requirements and permit information are available to structure owners online		
Community website and social media sources are set up for real-time information sharing		
Pre-set Public Service Announcements (PSA) developed for TV and/or radio		
Newsletters and brochures are used for periodic mailings		
Repetitive Loss (RL) and Severe Repetitive Loss (SRL) program/mailings		

2 COMMUNITY ENGAGEMENT & THE CURRENT STRUCTURE

It is also important to think about what tools you currently have available and how you might be able to use them for the SI/SD process. For example, what is your current method of communication between government officials and residents during post-event recovery?

COMMUNICATION BETWEEN GOVERNMENT OFFICIALS AND RESIDENTS		
COMMUNICATION METHOD	IS USE OF THIS METHOD DOCUMENTED, FOR INSTANCE IN YOUR EMERGENCY OPERATIONS PLAN?	PREVIOUS SUCCESS
Town Hall meetings		
Website		
Mailers or Letters		
Social Media (such as Next Door)		
Disaster Hotline		
Door Hangers		

2 COMMUNITY ENGAGEMENT & THE CURRENT STRUCTURE

WHAT INFORMATION DO YOU INCLUDE IN A DISASTER RECOVERY INFORMATION PACKET FOR RESIDENTS?

INFORMATION	IS USE OF THIS METHOD DOCUMENTED, FOR INSTANCE IN YOUR EMERGENCY OPERATIONS PLAN?	PREVIOUS SUCCESS
Individual Assistance Resources		
NFIP Compliance Guidance		
Recovery component of various grants (FEMA's HMGP, HUD's CDBG)		
Increased cost of compliance grants		
Flood Insurance typical Q&A		
Structure Owner Responsibilities		
SI/SD flood ordinance/building code requirements		
Small Business Administration		
Additional local resources		

3 DETERMINING IMPACT AREA

The purpose of this step is to think about what you will use as a base (maps, list of addresses in the floodplain, or other) to figure out the extent of the impact. By deciding on a map layer or other approach early, you will decrease the risk of duplicative assessments and missing properties. If you know you will be using a map and are not sure of your staff skillsets, it may be helpful to provide a “just-in-time” training on how to read a map and navigate terrain.

WHAT DO YOUR SI/SD FIELD INSPECTORS NEED TO MAKE THEIR DETERMINATIONS?			
AVAILABLE RESOURCES	MOST RECENT SOURCE/LEVEL OF ACCURACY	FORMAT (MAP/ TABLE, ELECTRONIC/ HARDCOPY)	RESPONSIBLE DEPARTMENT AND POINT OF CONTACT
Flood Insurance Rate Map (FIRM) and Flood Insurance Study (FIS) report			
Impact map (showing rainfall amounts, previous damage areas, or other impacts)			
High Water Marks			
Preliminary Damage Assessment Data			
Structures layer (property footprint)			
Flood Insurance Claims Information			
FEMA Risk MAP products (Depth Grids, Velocity Grids)			
Local, County, or State GIS lists and products			
Property Data layer-Assessments			
Permit Data layer			
First Floor Elevation (FFE)			
Base Flood Elevation			

Table Continued on next page.

3 DETERMINING IMPACT AREA

WHAT DO YOUR SI/SD FIELD INSPECTORS NEED TO MAKE THEIR DETERMINATIONS?			
AVAILABLE RESOURCES	MOST RECENT SOURCE/LEVEL OF ACCURACY	FORMAT (MAP/ TABLE, ELECTRONIC/ HARDCOPY)	RESPONSIBLE DEPARTMENT AND POINT OF CONTACT
Past property violations (zoning/code)			
Severe Repetitive Loss and Repetitive Loss Property Data			
General Community Map			

4 IDENTIFYING AVAILABLE PERSONNEL

This is a critical step to think through for any size disaster: who can manage the teams, complete the assessments, input the data, and analyze for consistency? Do they have the training and contracts in place to do so?

DO YOU HAVE THE RIGHT PEOPLE TO CONDUCT DAMAGE ASSESSMENTS?

TYPICALLY INCLUDED	TRAINED TO CONDUCT SI/SD ASSESSMENTS?	ABLE/AVAILABLE TO BE ON CALL DURING AN EMERGENCY?
Floodplain Administrator/Manager		
Tax Assessor		
Building Inspector(s)		
Emergency Management		
Third Party Contractor		
Staff activated by MOU		

WHO ARE THE STAFF THAT ARE DIRECTLY INVOLVED AND RESPONSIBLE FOR CONDUCTING THE SI/SD DETERMINATIONS?

RESPONSIBILITY	LOCAL FLOODPLAIN MANAGERS/STAFF	AUTHORIZED OFFICIALS	OTHER (WHO?)
Who will lead the inspections/assessments?			
Staff to collect substantial improvement/damage data			
Staff to determine pre-disaster value of damaged structures			
Staff to make and communicate post-disaster substantial damage determinations			

How will the identified staff lead inspections and assessments?

How will the identified staff collect substantial damage data?

What is the intended collection method?

How will staff determine the value of damaged structures?

What data source will they use?

4 IDENTIFYING AVAILABLE PERSONNEL

DO YOU KNOW THE TYPES OF RESPONSIBILITIES YOU WILL WANT YOUR SI/SD ASSESSMENT TEAM TO HAVE? SOME EXAMPLE POSITIONS AND RESPONSIBILITIES ARE LISTED BELOW.

SAMPLE RECOMMENDED RESPONSIBILITIES	YOUR COMMUNITY – STAFF RESPONSIBILITIES
SI/SD MANAGER	
<p>Example:</p> <ul style="list-style-type: none"> • Identify available resources • Notify elected officials and community departments, including fire, police, and emergency services, planning, and building of the upcoming fieldwork • Plan the Substantial Damage field inspections • Organize and train the inspectors • Supervise field operations • Ensure follow-up coordination with structure owners is completed • Coordinate final storage of SI/SD files 	
SI/SD INSPECTION LEAD	
<p>Example:</p> <ul style="list-style-type: none"> • Use SI/SD tool and data required to conduct a valid SI/SD assessment • Coordinate the collection of field materials • Set parameters of inspections (days, hours) and coordinate with officials and first responders to move inspections forward • Cross check that the similar structures in the same depth areas are being assessed at similar levels, that inspectors are correctly identifying the types of foundations, and alert inspection teams of any challenges/data discrepancies • Identify inaccessible areas or areas requiring prior approval not previously identified by the SI/SD Manager 	
SI/SD DATA LEAD	
<p>Example:</p> <ul style="list-style-type: none"> • Coordinate with the SI/SD Manager and the local tax department or other community departments to obtain structure data that can be pre-loaded into the SI/SD tool to reduce data entry requirements while enhancing data consistency and improving data quality 	

4 IDENTIFYING AVAILABLE PERSONNEL

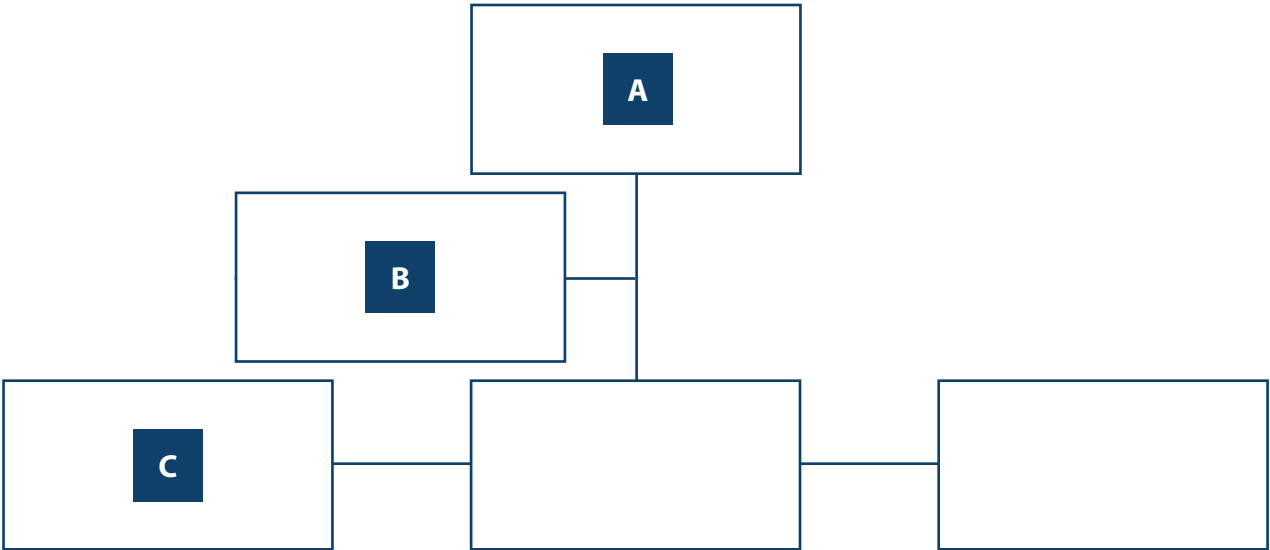
DO YOU KNOW THE TYPES OF RESPONSIBILITIES YOU WILL WANT YOUR SI/SD ASSESSMENT TEAM TO HAVE? SOME EXAMPLE POSITIONS AND RESPONSIBILITIES ARE LISTED BELOW.

SAMPLE RECOMMENDED RESPONSIBILITIES	YOUR COMMUNITY – STAFF RESPONSIBILITIES
QUALITY ASSURANCE (QA) REVIEW LEAD	
Example: <ul style="list-style-type: none">Responsible for the overall quality and consistency of the SI/SD data that the Substantial Damage determinations will be based on	
OTHER	

HOW WILL YOU ORGANIZE YOUR SI/SD TEAM FOR A SMALL EVENT?

WHAT ABOUT FOR SOMETHING LARGER THAT MAY HAVE A LONGER DURATION?

IT IS USEFUL TO INCLUDE THE INDIVIDUAL’S NAME AND POSITION TITLE FOR REFERENCE OVER TIME.



4 IDENTIFYING AVAILABLE PERSONNEL

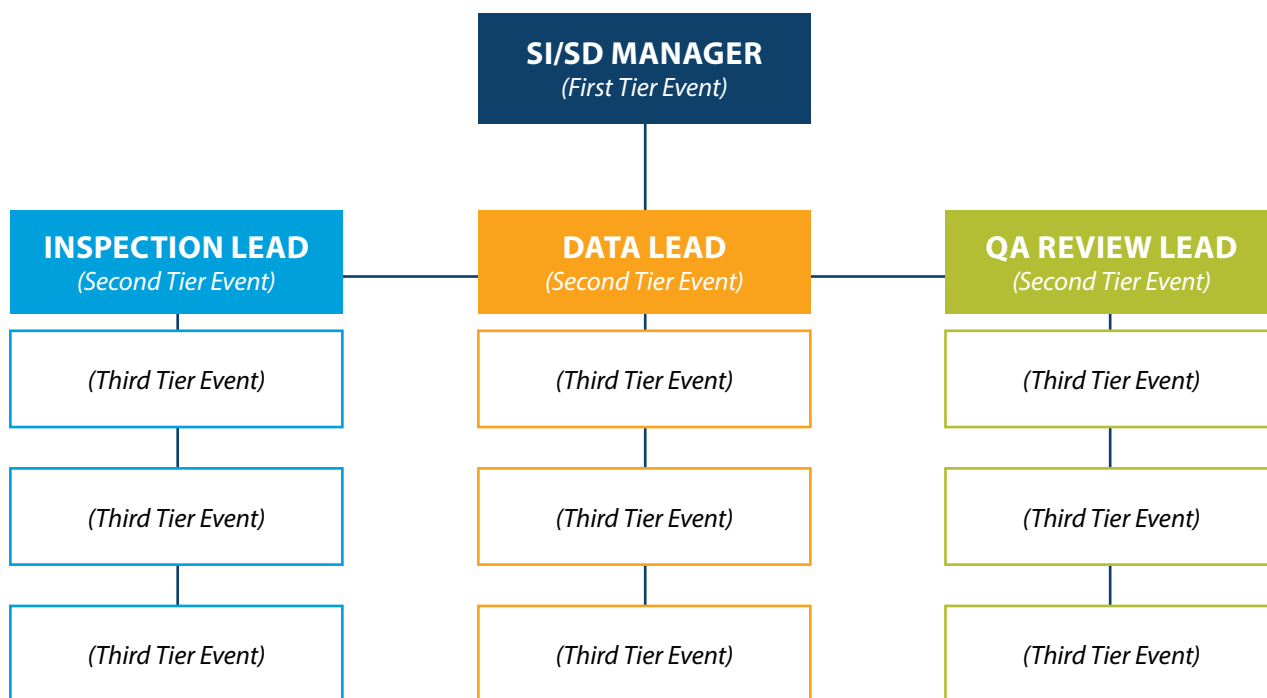
THIS COULD BE AN EXPANDED ORGANIZATIONAL CHART, SIMILAR TO THE ONE PICTURED ABOVE, WITH ADDITIONAL LAYERS OR DIFFERENT LAYOUT.

IN THE EXAMPLE SHOWN BELOW, THE COMMUNITY MAY USE THE SAME ORGANIZATIONAL CHART FOR ALL EVENTS AND SIMPLY EXPAND THE NUMBER OF PERSONNEL ACTIVATED BASED ON THE SIZE OF THE EVENT.

FOR INSTANCE, A SMALL EVENT MAY BE THE FIRST TIER AND NOT REQUIRE ANY ADDITIONAL PERSONNEL.

A CATASTROPHIC EVENT MAY REQUIRE THE EXPANDED ORGANIZATIONAL STRUCTURE AND ADDITIONAL OUTSIDE RESOURCES.

EACH MUNICIPALITY WILL HAVE TO DEFINE THE ROLES AND ORGANIZATIONAL STRUCTURES FOR THEMSELVES.



4 IDENTIFYING AVAILABLE PERSONNEL

IS THERE ANY OVERLAP IN PERSONNEL/AVAILABILITY FROM OTHER DEPARTMENTS OR MOU AGREEMENTS TO BE A FORCE MULTIPLIER WITH PERSONNEL CONDUCTING SIMILAR ACTIVITIES IN EACH IMPACTED AREA?

TYPICALLY INCLUDED	CONDUCTING DAMAGE ASSESSMENTS	CONDUCTING SIMILAR OUTREACH/ASSESSMENTS RESPONSIBILITIES
Floodplain Administrator/Manager		
Floodplain Management Staff		
Tax Assessor staff		
Building Inspector(s)		
Building Inspection Staff		
Emergency Management		
Third Party		
Staff activated by MOU		

THERE IS ALWAYS A RISK THAT THE PERSON YOU COUNTED TO COMPLETE A TASK IS ALSO BEING COUNTED ON BY SOMEONE ELSE.

GIVEN THEIR OTHER RESPONSIBILITIES, WHAT INVOLVEMENT WOULD YOUR COMMUNITY PERSONNEL HAVE IN DISASTER RESPONSE AND RECOVERY OPERATIONS, AND DO YOU HAVE THE STAFF TO CONDUCT SI/SD DETERMINATION COMMUNICATIONS AT THE SAME TIME?

RESPONSIBILITY	LOCAL FLOODPLAIN MANAGERS/STAFF	AUTHORIZED OFFICIALS	OTHER LOCAL PERSONNEL
Staffing the Emergency Operations Center			
Staffing/monitoring Disaster Field Office			
Processing permits			
Processing and Hanging written notices			
Conducting Public Assistance (PA) Inspections			

4 IDENTIFYING AVAILABLE PERSONNEL

It is important to have the right staff in place and that they are trained to do the assigned tasks correctly. How often do you provide SI/SD training? Does your community keep a certain number of staff members trained at all times? How many? What prompts the community to train additional personnel? What required courses would the community want the identified staff to complete?

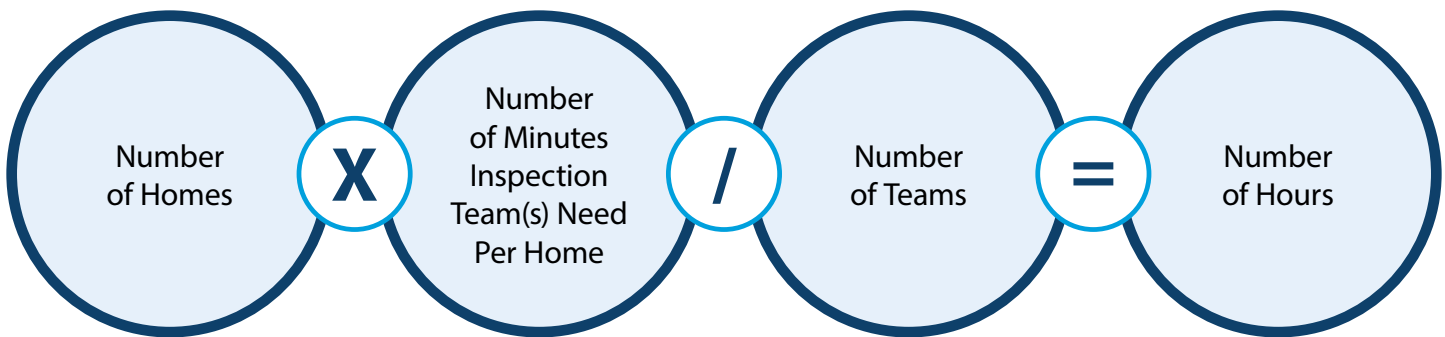
ARE THERE STAFF THAT ARE TRAINED IN SUBSTANTIAL IMPROVEMENT/DAMAGE AND HAVE THEY BEEN INVOLVED IN PREVIOUS DISASTER RECOVERY OPERATIONS?			
POSITION AVAILABLE	S-284: USING THE SDE TOOL	L273: MANAGING FLOODPLAIN DEVELOPMENT THROUGH NFIP	L/G 284: ADVANCED FLOODPLAIN MANAGEMENT CONCEPTS SI/SD MODULE
Trained Staff (%)			
Last Administered (Date & Location)			

HOW WILL YOU GROUP THE POSITION ROLES AND RESPONSIBILITIES OF TRAINED PERSONNEL FOR COMMUNICATION AND ASSESSMENT EFFICIENCY?

5 DETERMINING TIMEFRAMES

Based on the people, training, and the extent of damage, this section includes questions about how you will estimate the length of the process and what thresholds you will use to maximize efficiency and get your residents information quickly. Did you know that most rebuilding work begins within the first 7 days after an event? Conducting your determination quickly and communicating the results to residents is critical to recovery. The scope is based on the size of the inventory area, the number of structures, and the number of days needed for the inspections.

IT MAY BE HELPFUL TO DEVELOP AN EQUATION TO ESTIMATE HOW LONG IT WILL TAKE TO CONDUCT SI/SD DETERMINATIONS. A SAMPLE EQUATION IS INCLUDED BELOW.



Depending on the size, location, complexity, and uses of the non-residential structures, the inspection rate per day could vary (for example from 3 to 15 inspections). If there is a limited number of nonresidential structures to inspect, the SI/SD Manager could designate one team for all or most of the non-residential inspections.

6 ESTABLISHING SUBSTANTIAL IMPROVEMENT/ SUBSTANTIAL DAMAGE DETERMINATION PROCESS AND METHODOLOGY

Whether you use FEMA’s Substantial Damage Estimator (SDE) tool or some other process, this section looks at how you can consistently set up and implement an SI/SD determination process in your community. Consider the event size: small, medium, large – how does that impact the availability of personnel, materials, and timeframes? What would it take to set up a consistently applied methodology?

FEMA’s SDE software offers a formalized approach to develop reasonable estimates of building values and reasonable estimates of the cost to repair or reconstruct buildings. The FEMA SDE enables local officials to calculate a reasonable and defensible estimate of whether a building has been substantially damaged. Local officials can use these results from the software to make substantial damage determinations. What process/ formula will your community be using to conduct the assessments?

It is also important to look at the 50-percent threshold. This threshold was chosen as a compromise between two extremes. One extreme would be to prohibit all investment in existing structures that do not meet minimum NFIP requirements. The other extreme would be to allow structures in flood hazard areas to be improved in any fashion without regard to the flood risk. In the first alternative, there is the potential for causing hardship to those who have located in flood hazard areas without knowledge of the risk because the structure was constructed prior to the designation of the area as flood-prone. These individuals would not be able to improve their structures as damage or age contribute to deterioration. The second alternative provides no mechanism to ensure that increased investment in flood hazard areas will receive needed protection from the flood risk, which increases peril to life and property. The NFIP threshold of 50 percent is a compromise at a half-way point and was chosen because it conforms to similar building code and zoning standards that also use this threshold.

Please also consider if and how data will be shared from preliminary damage assessment (PDS) teams to inform SI/SD assessors.

HOW WILL YOU IDENTIFY AND CLASSIFY THE STRUCTURES WITH DAMAGE?		
DAMAGE	STRUCTURE TYPE	METHOD OF IDENTIFICATION AND CLASSIFICATION
0-40 percent damage		
40-60 percent damage		
More than 60 percent damaged		

6 ESTABLISHING SUBSTANTIAL IMPROVEMENT/ SUBSTANTIAL DAMAGE DETERMINATION PROCESS AND METHODOLOGY

IT IS IMPORTANT TO THINK THROUGH A CONSISTENT METHODOLOGY.

HAS YOUR COMMUNITY IDENTIFIED A METHODOLOGY FOR CONDUCTING SI/SD DETERMINATIONS?

HOW WILL YOU ESTIMATE (SPECIFICALLY IN THE 40-60 PERCENT RANGE)?

ARE THERE STRUCTURAL CONSIDERATIONS THAT MAY IMPACT YOUR METHODOLOGIES?

PROCESS	IDENTIFIED? Y/N	NEXT STEPS
SI/SD determination methodology		
Determine hazard impact area		
Conducting assessments of 40- to 60-percent damaged		
Considerations for structure, structure location, and structure materials/ make-up?		

6 ESTABLISHING SUBSTANTIAL IMPROVEMENT/ SUBSTANTIAL DAMAGE DETERMINATION PROCESS AND METHODOLOGY

Whether your community uses the FEMA SDE tool or another platform, it will be important to be as specific as possible in each SI/SD determination. This may decrease structure owner confusion and the number of potential appeals later.

WHAT DATA WILL YOU USE IN MAKING SI/SD DETERMINATIONS?

CATEGORY	REQUIRED DATA	SUGGESTED DATA
OWNER AND STRUCTURE LOCATION		
Owner's first and last name		
Owner's telephone number		
Community Name		
Zip Code		
Official Structure Address		
Owners Mailing Address (if different than structure)		
County Name		
Lot and Parcel		

CATEGORY	REQUIRED DATA	SUGGESTED DATA
ASSESSED BUILDING VALUE		
Adjusted Tax Assessed Structure Value		
Professional Market Appraisal		
Computed Actual Cash Value		
Date of Last Tax Adjustment		

6 ESTABLISHING SUBSTANTIAL IMPROVEMENT/ SUBSTANTIAL DAMAGE DETERMINATION PROCESS AND METHODOLOGY

WHAT DATA WILL YOU USE IN MAKING SI/SD DETERMINATIONS?		
CATEGORY	REQUIRED DATA	SUGGESTED DATA
STRUCTURE INFORMATION		
Date of Construction		
Date of Improvements requiring permit		
Number of Dwelling Units on Property		
Habitable area (square feet)		
Structure Use		
Structure Style		
Construction Type		
Foundation Type		
Roof Type		
Exterior Finish		
HVAC System		
Previous Permits, LOMAs, and Elevation		
Certificates as applicable		
Attached or Detached Garage		
Other Structures on same lot		

6 ESTABLISHING SUBSTANTIAL IMPROVEMENT/ SUBSTANTIAL DAMAGE DETERMINATION PROCESS AND METHODOLOGY

This section includes questions about when and how your community will coordinate with County, State, and Federal partners. If there is a federally declared disaster, you may be able to request different support than if it is a local event. Who in your community decides what is requested and how those requests are communicated?

ARE THERE ANY STATE OR FEDERAL AGENCIES THAT ARE INVOLVED IN YOUR DAMAGE ASSESSMENT PROCESS, SPECIFICALLY THOSE THAT PARTICIPATE IN THE SUBSTANTIAL IMPROVEMENT/DAMAGE DETERMINATION?

NFIP STATE COORDINATOR	STATE HAZARD MITIGATION OFFICER	OTHER STATE AGENCY OFFICIAL	FEMA REGIONAL FLOODPLAIN MANAGEMENT BRANCH CHIEF	OTHER FEDERAL AGENCY OFFICIALS

AT WHAT STAGE IN THE DECLARATION PROCESS IS THERE INTERACTION WITH THE STATE OF UTAH DIVISION OF EMERGENCY MANAGEMENT AND FEMA?

COORDINATION	UTAH DIVISION OF EMERGENCY MANAGEMENT	METHOD AND PRODUCT	FEMA	METHOD AND PRODUCT
Pre-Disaster Planning				
Response Operations				
Preliminary Damage Assessments				
Damage Assessments				

7 COMMUNICATING DAMAGE TO PARTNERS (LOCAL/STATE/FEDERAL)

Communities that have extensive floodplains and significant numbers of flood-prone structures are encouraged to plan ahead to handle the workload. Thresholds should be set by the community to help determine when to enlist outside help.

Even with good planning, support may be necessary to handle large numbers of damage inspections and permit applications. In addition to support from the State and FEMA, resources may be available from other communities, State floodplain management associations, State building code associations, and organizations that represent engineers and architects. Some States and communities develop mutual aid agreements, inter-local agreements, or other mechanisms to facilitate this post-disaster support.

The SI/SD process begins and ends at the local level. While help may be offered to perform inspections and gather data, perhaps using the FEMA SDE, making final SI/SD determinations and permit decisions remain the responsibility of local officials in affected communities.

FEMA mitigation experts continue to coordinate with local State and local officials, especially floodplain managers, to provide detailed information and expert advice on repairing and rebuilding damaged homes in the floodplain. Bringing homes and businesses into compliance with local floodplain ordinances is not only required but may reduce individual flood insurance premiums.

8 COMMUNICATING SI/SD INFORMATION TO PROPERTY OWNERS

It is important to identify how your community will communicate SI/SD information to property owners. There are a lot of different ways to communicate information – some more public than others. During the SI/SD process, it will be important to share information with the public regarding the process and what to expect, as well as with individuals about their specific SI/SD determinations and the appeal process.

HOW DO YOU COMMUNICATE THE DETERMINATION OF SUBSTANTIAL IMPROVEMENT OR SUBSTANTIAL DAMAGE TO STRUCTURE OWNERS?

SUBSTANTIAL IMPROVEMENT/DAMAGE DETERMINATION	YES	NO	LAST UPDATED
Letter mailed to residents			
Paper handed to person directly			
Paper posted at a physical community site			
Information posted to an online community site that residents must check			
Emailed notification			
Social Media			

DO YOU HAVE AN APPEALS PROCESS IN PLACE?

SUBSTANTIAL IMPROVEMENT/ DAMAGE DETERMINATION APPEAL PROCESS	YES	NO	LAST UPDATED
Included in Emergency Operating Procedure or Plan			
Included in Floodplain Ordinance			

8 COMMUNICATING SI/SD INFORMATION TO PROPERTY OWNERS

DOES YOUR APPEAL PROCESS ENSURE THAT SUBSTANTIAL IMPROVEMENT/DAMAGE DETERMINATIONS ARE DEFENSIBLE AND ACCURATE?

SUBSTANTIAL IMPROVEMENT/DAMAGE DETERMINATION APPEAL PROCESS	YES	NO
Does your community comply with the minimum requirements of 44 CFR 63 (implementing NFIP)?		
Does your community comply with its own Floodplain Ordinance?		

IN PREPARING FOR APPEALS, WHAT METHODS OF DETERMINATION ARE RECOGNIZED AND SHOULD BE INCLUDED IN THE APPEAL?

SUBSTANTIAL IMPROVEMENT/DAMAGE DETERMINATION APPEAL	REQUIRED	RECOMMENDED
Two estimates from State-licensed contractors		
Insurance company proof of loss		
State-licensed real estate pre-event appraisal		

9 MONITORING AND REINTEGRATION

DOES YOUR COMMUNITY HAVE A PROCESS FOR INTEGRATING BEST PRACTICES AND LESSONS LEARNED INTO ONGOING TRACKING, MONITORING, AND PERMITTING PROCEDURES?			
ONGOING TRACKING PROCEDURES	YES	NO	COMMENTS
Identified in an After-Action Report (AAR)			
Revision to an agency's Standard Operating Procedures (SOPs) or Administrative Procedure(s) document(s)			
Identified in SI/SD Determination Methodology Procedure and event records			

? ADDITIONAL QUESTIONS AND CONSIDERATIONS

HOW WILL YOU...?

1. Inform other community officials about the determinations and the NFIP requirements for reconstructing substantially damaged structures?
2. Prepare a press release or other outreach to explain the determination process and the implications of the determinations?
3. Prepare and distribute a “determination letter” with the name and telephone number of a community contact? The letter should state that the determination is required under the community’s floodplain management ordinance and should specify that all rebuilding, improvements, or new construction in the regulatory floodplain requires a community permit.
4. Post notices of Substantial Damage or unsafe conditions on structures as appropriate.
5. Identify publications from FEMA, the American Red Cross, and State or local agencies that provide guidance on rebuilding after a disaster?
6. Identify potential mitigation measures for the community and individual residents?
7. Identify and implement appeal procedures?
8. Notify the State NFIP Coordinator’s office of the results of the Substantial Damage determinations and determine what, if any, additional activities are required?
9. Store the SI/SD data?