

Housekeeping

- Remain muted during the webinar unless invited to unmute.
- Questions can be entered in the Q&A section throughout the presentation and will be addressed at the end and at intervals during the webinar.
- This webinar is being recorded and will be posted on the HUD Exchange website at a later date.





Planning for Operations During an Emergency or Disaster



Agenda and Learning Objectives

- Introduction
- Learning Objectives
 - Proactively Preparing for Emergencies and Disasters
 - Continued Operations and Administrative Plans
 - Waiver Processes and Types of Waivers
 - Review of COVID-19 Waivers



Poll Time

- Has your PHA been affected by a disaster?
- Have you hired additional staff to maintain workloads during the pandemic or disaster?
- Have you had an increase in overtime to keep up with demand?
- Have you noticed a slowdown of interim changes due to income changes?



Preparing for Emergencies and Disasters

[LINK: PHA Disaster Readiness and Preparation Guide](#)

Preparing for Emergencies and Disasters: HUD-issued PHA Readiness and Preparation Guide

- Pre-disaster Preparedness
 - Coordination
 - Resource and guidance development
 - Partnership development
 - Readiness and staffing
 - Training
- Post-disaster Recovery
 - Activation and deployment
 - Assessment
 - Recovery support strategy
 - Coordination and technical assistance
 - Communication and information sharing
 - Transition and normalization



Preparing for Emergencies and Disasters: Interagency Coordination

- HUD and FEMA materials assist staff and tenants to prepare for unforeseen events
- Know the Disaster Coordinator in your city/jurisdiction
- Work with local nonprofits:
 - American Red Cross
 - Goodwill
 - Catholic Charities
 - Habitat for Humanity



Preparing for Emergencies and Disasters: Interagency Coordination (cont.)

- Coordinate between staff and federal agencies
 - Reduce or avoid duplication of effort
 - Distribute resources based on need
- FEMA guidance: Disaster sequence of events
 - <https://training.fema.gov/emiweb/downloads/is208sdmunit3.pdf>
- FEMA guidance: How communities and states deal with emergencies and disaster
 - Full local and state response, recovery, and mitigation activities
 - What agencies provide during a disaster
 - https://training.fema.gov/emiweb/downloads/is7unit_2.pdf



Preparing for Emergencies and Disasters: Communication

- Communicate with HCV and LIPH participants on:
 - Public housing tenants' eligibility for vouchers
 - Housing Choice Voucher participants and porting
- Be familiar with:
 - Final 2015 portability rule
 - HUD 2017 guidance on porting from Presidentially declared major disaster declaration (MDD) areas
 - HUD HCVP Guidebook for all regulatory requirements related to moves and portability



Preparing for Emergencies and Disasters: Communication (cont.)

- Important links:

- https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/portability
- https://www.hud.gov/sites/dfiles/pih/documents/portability_guidance.pdf
- https://www.hud.gov/sites/dfiles/pih/documents/hcv_guidebook_moves_and_portability.pdf



Preparing for Disaster and Emergencies: Assessing Impacts

- Check in with staff and residents
- Damages and costs
- Operations and staff
- FEMA or state grant application
- Other funding options:
 - CDBG-DR
 - HUD CDBG Mitigation Funding (CDBG-MIT)
 - Local city, county, state
 - Nonprofits and foundations



Preparing for Disaster and Emergencies: Assessing Impacts (cont.)

- Maintain pictures, documents, and receipts supporting claims and file reports
- Procurement requirements to avoid denials
- First means of reimbursement is filing with PHA insurance.
 - In cases where PHA insurance does not cover in full or if there's a unique event like a flood (outside of the 100-year flood plain) and no flood insurance was taken out on those properties:
 - Check with HUD and see if a FEMA MDD was declared for the area
 - If so, there's a chance that FEMA PA covers claims not otherwise covered by PHA insurance or HUD



Check In

- What were your first steps in assessing impact?



An aerial photograph of a suburban neighborhood, showing a grid of houses and trees. The image is overlaid with a gradient that transitions from a deep blue at the top to a vibrant green at the bottom. The text 'Continued Operations and Administrative Plans' is centered in the upper half of the image in a white, sans-serif font.

Continued Operations and Administrative Plans

Emergency Response Plan

- Prepare an Emergency Response Plan
 - Ensures that COOP Plan can be put into practice
- Emergency Response Plan
 - Identifies most likely community threats
 - Specifies measures and equipment to address specific emergencies
 - Spells out emergency procedures for disaster events
- Emergency Response Plan Toolkit
 - <https://files.hudexchange.info/resources/documents/OHC-DR-Toolkit-Emergency-Response-Plan-Guidance.pdf>



Continuity of Operations (COOP) Plan

- Plan for recovering and continuing operations in response to emergencies or significant disruptions to agency operations
- Ensures all personnel, facilities, and information are protected so necessary functions and normal operations can resume rapidly



Continuity of Operations (COOP) Plan (cont.)

- COOP Plans address:
 - Critical functions to perform regardless of emergency
 - Additional services that may be needed
 - Personnel and resources needed to perform these functions
 - Getting up and running again after the emergency
 - Developing procedure for notifying HUD
- <https://www.hudexchange.info/programs/housing-counseling/housing-counseling-disaster-recovery-toolkit/preparing/>



Administrative Plan Considerations

- Identify barriers for tenants and landlords
- Ensure Administrative Plan provides flexibility during a disaster
- Prepare for increased communication when funds become available
- Examples based on past experiences to consider for Administrative Plan:
 - Housing due to displacement and porting
 - Eligible tenant-related expenditures: security and utility deposit assistance, rental application fees, holding fees, etc.



Administrative Plan Considerations (cont.)

- Eligible PHA–related expenditures:
 - Funding for outreach and recruitment of new HCV landlords
 - Incentives and retention payments
 - Hiring extra support staff
- FEMA provides specific instructions when disaster declaration is made and what the declaration covers
 - Renting temporary housing when assisted unit is uninhabitable
 - Storm-related medical and dental expenses
 - Moving and storage fees
 - Replacement or repair of personal property (including vehicles)
 - Storm-related funeral and burial expenses
 - Other serious disaster needs



Administrative Plan Considerations (cont.)

- Create flexibilities in processes by:
 - Increasing options to go paperless
 - Establishing emergency phone line or email address
 - Making staff available to answer questions
 - Providing resource materials
 - Reinforcing established connections with other entities facilitating emergency relief



Continued Operations Consideration

- Establish alternatives to routine activities
 - Provide clear instructions for what alternative processes are available and how processes are being managed within your organization
 - Eligibility for housing and other assistance
 - Paperwork to be shortened or waived
 - Work hours
 - How and where important updates will be communicated
 - Specific measures and equipment to address specific emergencies
 - Emergency procedures for disaster event



Check In

- How has your agency prepared for continued operations in the event of an emergency?



Waiver Processes and Types of Waivers

- Regulatory Waivers PIH Notice 2018-16
 - Provides guidance for submitting requests for regulatory waivers for PHAs in Presidentially declared MDDs
 - For MDDs, ensure that specific locality/county/parish is included in the MDD
 - MDDs sometimes include either Individual Assistance (IA) and Public Assistance (PA) or both
 - PHAs apply under FEMA PA
 - Individuals apply under FEMA IA



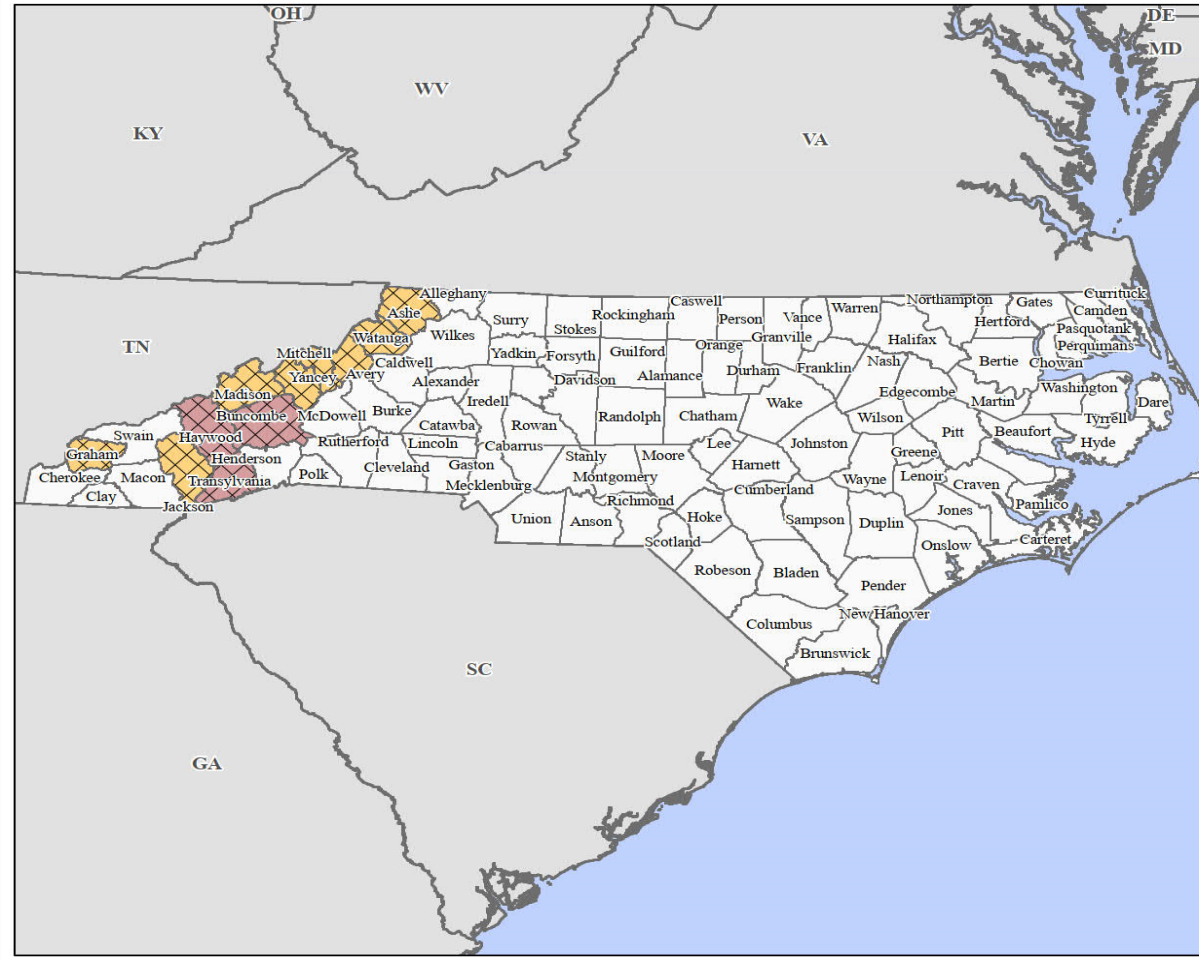
Waiver Processes and Types of Waivers (cont.)

- Regulatory Waivers PIH Notice 2018-16
 - FEMA Declared Disasters link:
<https://www.fema.gov/disaster/declarations>
 - Emergency Declaration (ED) is not the same as a MDD
 - Waivers must be requested through Field Office unless related to an exemption noted in the PIH notice
 - Each waiver must identify regulation from which relief is sought
 - Exceptions are for waivers in MDD areas and Mixed Finance

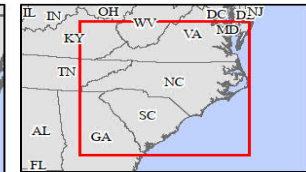


Know Your County or Parish

FEMA-4617-DR, North Carolina Disaster Declaration as of 10/01/2021



FEMA

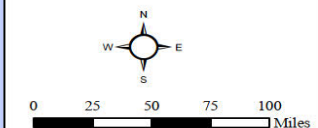


Data Layer/Map Description:
The types of assistance that have been designated for selected areas in the State of North Carolina.

All areas in the State of North Carolina are eligible for assistance under the Hazard Mitigation Grant Program.

Designated Counties

- No Designation
- Individual Assistance and Public Assistance (Categories A - G)
- Public Assistance (Categories A - G)



Data Sources:
FEMA, ESRI;
Initial Declaration: 09/08/2021
Disaster Federal Registry Notice:
Amendment #1: 10/01/2021
Datum: North American 1983
Projection: Lambert Conformal Conic

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Annual Federal Register Notice on Disaster Relief

- HUD has flexibilities and expedited waiver process for PHAs in MDD areas
- If a unit has been vacated due to a Presidentially declared Disaster, MDD PHA (with HUD approval) may treat the unit as an “approved vacancy” for up to 12 months
- If displacement is caused by MDD, HUD will consider waiving section 905.400(i)(5) to allow all unexpended Capital Fund Replacement Housing Factor Grants to be used for public housing modernization
- HUD will consider a request from an MDD PHA wishing to waive this requirement to allow displaced families in areas affected to comply with mortgage terms or make necessary repairs
- Review the exceptions



Review of COVID-19 Waivers

- PIH Notice 2020-05
 - Provides waivers and administrative relief and allows for alternative approaches to various aspects of the Authority:
 - Processing Requests for Tenancy Approvals (RFTAs)
 - Implement plans for alternative procedures
 - Use of amounts made available under CARES Act supplemental appropriation, FY 2020 Operating Fund and Capital Fund appropriations, and any prior Operating Fund or Capital Fund appropriations
 - Review carefully
 - Notice provides for many waiver opportunities to ease administrative burdens, extend certain deadlines, or postpone public hearing requirements



Review of COVID-19 Waivers (cont.)

- PIH Notice 2021-14
 - Provides for COVID-19 statutory and regulatory waivers and alternative requirements:
 - Waives third-party income verification requirements for PH and HCV
 - Waives eligibility determination requirements from 30 days to 90 days for admissions to be eligible for continued assistance
 - Waives requirement so that a PHA may allow a family to initially lease an under-occupied PBV or RAD unit
 - Suspends requirement for community service and self-sufficiency activities for public housing tenants
 - Extends scores on record for PHAs and SEMAP to 12/31/2021



Review of COVID-19 Waivers (cont.)

- Activities after CARES Act Waivers
 - Determine how to continue business operations
 - Implement other efficiencies that permit streamlined operations with current funding?
 - Reactivate proven viable and effective processes as needed during a disaster?
 - May need to retrain staff on processes, especially new hires
- Create your action plan now if you don't have one or create a plan for future use and preparedness



Debrief and Poll



- How was your experience with waiver requests?
 - Rate on the scale of 1 to 3
 - 1 = not satisfactory
 - 2 = satisfactory
 - 3 = great
- Will you continue some practices from waivers you implemented?
 - If so, which one?



Resource Materials

- Regulatory Waivers, Notice PIH 2018-16
- COVID-19 Statutory and Regulatory Waivers, Notice PIH 2020-05
- COVID-19 Statutory and Regulatory Waivers and Alternative Requirements, Notice PIH 2021-14
- Relief from HUD Public Housing and Section 8 requirements available to PHAs to assist with recovery and relief efforts on behalf of families affected by presidentially declared major disasters (Federal Register)



Resource Materials (cont.)

- Public Housing and Section 8 Programs: Housing Choice Voucher Program: Streamlining the Portability Process
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/portability
- HUD guidance (2017) on porting from Presidentially declared Major Disaster Declaration areas:
https://www.hud.gov/sites/dfiles/pih/documents/portability_guidance.pdf



Resource Materials (cont.)

- FEMA guidance on Disaster Sequence of Events
<https://training.fema.gov/emiweb/downloads/is208sdmunit3.pdf>
- FEMA guidance on how communities and states deal with emergencies and disasters
https://training.fema.gov/emiweb/downloads/is7unit_2.pdf



Additional Questions

- Send TA service requests to hudcc.trainings@iem.com
- Subject line: PHA COVID-19 TA Post-training Follow-up Question
- Include in the body of an email:
 - Requester name
 - Requester PHA
 - Training topic (include training attended)
 - Specific issue and/or question (be brief)
 - Email and phone number



Thank You

