



SUBSTANTIAL IMPROVEMENT/SUBSTANTIAL DAMAGE (SI/SD)

Guided Community Self-Assessment

Does your community have a Substantial Improvement/Substantial Damage (SI/SD) process in place? What about some of the 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 still worth continuing the assessment. Start with where you are and this will help you determine what you may want to address moving forward. To help with navigation, the steps have an icon for quick reference.

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.
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 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?
5		DETERMINING TIMEFRAMES	Based on the people, training, and extent of damage, this section includes questions 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 PROCESS AND 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 questions on when and how your community will coordinate with Federal, State, and other local partners.
8		COMMUNICATING SUBSTANTIAL IMPROVEMENT/SUBSTANTIAL 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.

Throughout this document you will see two other symbols:



This symbol is for professional-tips (pro-tips) and recommendations. Not all of them apply to every community, but some may be useful to consider.



This symbol is for key decision points that your community will have to make to develop an administrative procedure.

WHO SHOULD USE THE SELF-ASSESSMENT TOOL?

This guided self-assessment can help your community identify what resources are available and what you can improve to recover quickly. Therefore, local government departments such as community planning, public works, and emergency services; elected and appointed local officials; and other community organizations and nonprofits can use the self-assessment to determine their community's readiness to begin and complete the SI/SD process quickly and effectively to get residents back in their homes faster.

WHY IS IT IMPORTANT?

Completing this assessment is a good first step to help your community review its current strategies to implement the SI/SD process and improve efficacy, as well as its readiness to adopt additional strategies to reduce long-term challenges. No one wants a scenario where your resident invests in post-disaster repairs and is then told the updates are non-compliant and not allowable. The resident may not be able to afford a second round of repairs to become compliant. The community may be found out of compliance with the NFIP if the ordinance is not enforced. Your community can make a difference by communicating early and often with structure owners, contractors, County, State, and Federal partners. If a community is not yet using the strategies listed in the assessment and would like to, the FEMA workshop materials that supplement this assessment and some of the resources cited at the end of the document can provide ideas for how to begin implementing these approaches.

Do you have conversations with your structure owners about development, repair, or improvement in the floodplain? This self-assessment can give you some additional topics to cover with them. If not, the self-assessment can help start those conversations.

This document is meant to serve as a quick resource to guide you through what you have and might need for the SI/SD process. There is also an administrative template and a few other tools that accompany this self-assessment, so please make sure you check out the whole package.

If you need to expedite the determination process, you may want to start with Step 3.

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)				

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 (e.g., through an MOU, State Emergency Management Assistance Compact, or otherwise)?**

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 in Disaster (VOAD) inspection staff		



Pro-Tip: Be familiar with your local codes and ordinances. This will assist in post-disaster activities such as planning and damage assessments. Knowing what is required of a community post-disaster can help streamline the recovery process. It is helpful to maintain a good relationship with neighboring communities and your state emergency management agency. Sharing ideas and programs between communities will provide consistency, strengthen coordination, and build resiliency.



Decision Point: Is a substantial modification (improvement or damage) determination process covered in your ordinance? Where is it? If not, how are you going to get the authority/document it? Knowing your regulations is important. Do the documents conflict?

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.

What public communication methods are employed by your community? How does your day-to-day messaging lend itself to communicating about SI/SD post-event?

OUTREACH METHOD	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		



Decision Point: If none, what would you do/how would you address this in an emergency? How do you take your day-to-day procedures and apply them post-event? Are your procedures scalable? How are they documented? How are you checking if they are effective?

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 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 NextDoor)		
Disaster Hotline		
Disaster Field Office		
Door Hangers		
Media (Radio, Newspaper, TV)		

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		



Pro-Tip: Legal notice may have to be given to residents/citizens in a specific manner to comply with Federal/State/local laws. Adherence to these should be strictly followed to avoid an overabundance of court challenges and process delays following a disaster.

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			
Past property violations (zoning/code)			
Severe Repetitive Loss and Repetitive Loss Property Data			
General Community Map			



Pro-Tip: Pre-printing the parcel map or pre-loading data into the FEMA SDE Tool 3.0 or Excel spreadsheet into an agency-approved device can help with data collection. Also, prepare a “go bag” with cameras, tape measure(s), GPS, clipboards, and tablets, pens, permit notices, and foul weather gear, if available.



Decision Point: For Substantial Damage, you are required to look at all structures in the SFHA; which tools will Assessors use to mark them? How will you know the full impact? How are you addressing technological literacy, map reading, and other skill-sets necessary to complete this task?



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?

PEOPLE

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		



Pro-Tip: Smaller communities may want to utilize other resources for the “who” – local fire personnel, real estate appraisers, and contractors may be a great alternative staffing source as long as the other roles don't conflict.

Who are the staff that are directly involved and responsible for conducting the SI/SD determinations?

RESPONSIBILITY	IDENTIFY RESPONSIBLE STAFF		
	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?			



Pro-Tip: Do not forget, your staff might be impacted by the disaster too! Make sure that you schedule staff appropriately and always have a backup/succession plan if personnel are unavailable.



Decision Point: At what point do you recognize your resources are overwhelmed and you need to enact MOUs?

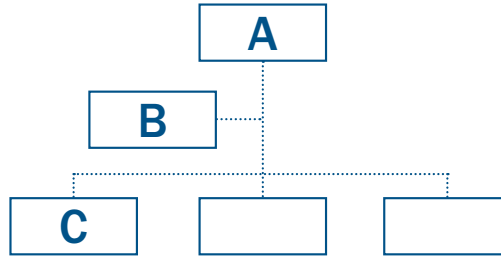


Pro-Tip: Ensure that your community understands and defines its threshold for requesting State and Federal resources.

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
<p>SI/SD Manager</p> <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. 	<p>SI/SD Manager?</p>
<p>SI/SD Inspection Lead</p> <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 approval not previously identified by the SI/SD Manager. 	<p>SI/SD Inspection Lead?</p>
<p>SI/SD Data Lead</p> <p>Example:</p> <p>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.</p>	<p>SI/SD Data Lead?</p>
<p>Quality Assurance (QA) Review Lead</p> <p>Example:</p> <p>Responsible for the overall quality and consistency of the SI/SD data that the Substantial Damage determinations will be based on.</p>	<p>QA Review Lead?</p>
	<p>Other?</p>

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.

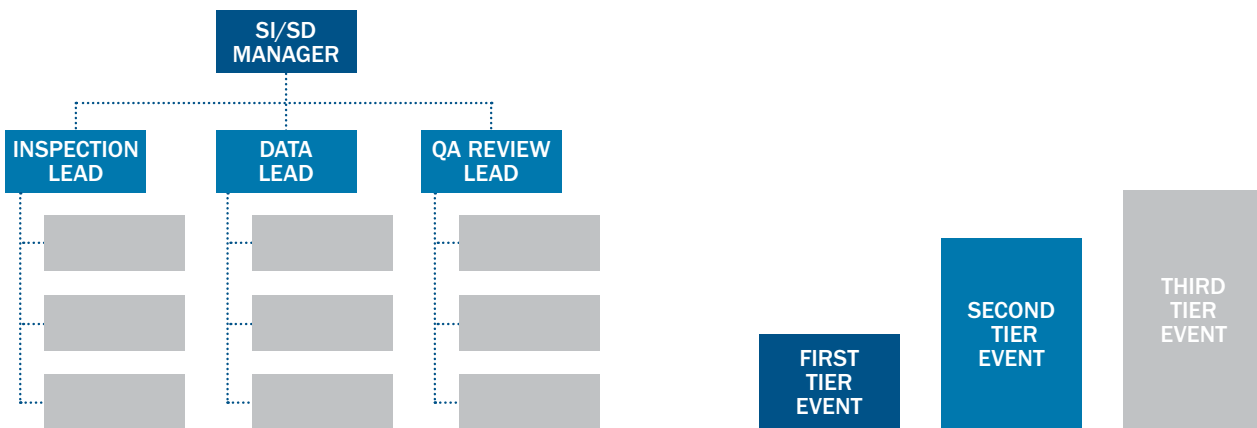


Pro-Tip:

It may help to define thresholds for the type of event. For instance, if there are 0-50 homes impacted, that constitutes a local event; 51-100 homes would be considered a local event with MOUs enacted and neighboring support; 101-500 homes impacted would be a devastating/expanded area event where your neighbors might be impacted as well; and 500+ homes impacted would be catastrophic with external supports requested immediately.

Some communities look at how they can integrate their SI/SD teams into their larger Incident Command System (ICS) structure during the transition from response to recovery and how to categorize personnel by function type.

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.



Decision Point: When thinking about the personnel involved in SI/SD, it is important to figure out what roles and responsibilities will look like, what the organizational chart might look like, and how to make the structure scalable to address small events all the way up to catastrophic. It is important that the solutions you identify are workable for your community.

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
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 on 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	IDENTIFY RESPONSIBLE STAFF		
	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			



Decision Point: if you don't have the capacity (staffing and resources) necessary, do you have a training/capability plan to increase available personnel?



Pro-Tip: It is important to remind each property owner in the impacted SFHA that permits are still required for development!



Pro-Tip: If local staffing resources are insufficient to complete the required number of inspections by the intended date, the community should look to neighboring communities to obtain additional staff or consider the impacts of extending the assessment completion date.

TRAINING

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	IS-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?



Decision Point: What guidance will you give assessment teams about interaction with residents/structure owners? What information will be shared formally? Will assessors be allowed/encouraged to conduct outreach during assessments?



Pro-Tip: Contact State exercise and training staff, and the Emergency Management Institute (EMI) for a list of regional trainings offered, to request or register for SI/SD courses, and any applicable sponsorships.





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.

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

This equation shows the time per task multiplied by the impacted area divided by the number of personnel available to complete the task(s). Some factors to consider include:

- Identifying Damage
- Collecting Data
- QA/QC of Data
- Decision/Determination for Structures
- Decision/Determination Approval [this may take some time because of political implications]
- Communicating to Structure Owners

How will you calculate the number of days it will take to collect the data based on the number of structures to inspect and the number of available inspectors (for instance, using two inspectors per team)?



Decision Point: What are the thresholds to request assistance? Will it be when the inspections will take more than 7 days? How will you calculate the time estimates given your community’s geography? Will your staff be able to work weekends to meet deadlines?



Pro-Tip: The inspection rate for non-residential structures will likely vary depending on the size of the structures (number of stories and square footage) and the complexity of the structure (shape, utility systems). A general estimate for the number of residential inspections per two-person team per day is 20 to 35 for areas where the inspectors can walk between structures. Teams may be able to do more inspections per day in areas that are very flat, with homes close to each other, and housing that is similar in size and flood damage.

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.



Pro-Tip: Considering thresholds (0-50, 50-100, 100-500, 500+), what makes sense for your community? Timely inspections help get residents back in their homes. The quicker you are able to identify the threshold of impacted structures, the more likely outside resources will be able to assemble and assist in a helpful timeframe. When inspections can be done quickly and determination information shared, structure owners will be able to rebuild in a compliant way leading to a more resilient community.



Decision Point: When will you begin assessments? The answer is often “as soon as possible.” It is important to use this time (pre-disaster) to identify what the obstacles are that might prevent you from beginning the assessment, and how you plan to overcome them.



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.

CONDUCTING THE SUBSTANTIAL DAMAGE DETERMINATION PROCESS

How will you identify and classify the structures with damage?

DAMAGE	STRUCTURE TYPE	METHOD OF IDENTIFICATION AND CLASSIFICATION
0-40 percent damaged		
40-60 percent damaged		
More than 60 percent damaged		



Pro-Tip: You will likely conduct a more detailed assessment of the structures in the 40-60 percent window to ensure consistent determinations.

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?		



Decision Point: How will you set up your process to be consistent and defensible?



Pro-Tip: It may be helpful to send SI/SD letters and templates to everyone, in case home owners shift from 49- to 50-percent damage. The FEMA SDE includes template determination letters communities can utilize.

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



Decision Point: Where will you store this information and data to be most accessible to your staff (ordinance, emergency operations plan, addendum, or otherwise) and complies with all applicable protected information requirements?



Pro-Tip: Not all structure data are readily available after a disaster. Therefore, it may be worthwhile to meet with the tax assessor as soon as possible to discuss the SI/SD data needs and the format of the available tax data, while also determining how much time the assessor's office will require to provide the requested data.



Pro-Tip: In making SI/SD determinations, communities can use a variety of sources to estimate market value and repair costs. Please check the Substantial Improvement/Substantial Damage Desk Reference, FEMA P-758, Chapter 4, Section 4: Determining Costs of Improvements and Costs to Repair and Section 5: Determining Market Value. When estimating costs, communities will need to be aware of property owners submitting multiple permits for phased improvements. Additionally, if a community has a cumulative clause, they must have a system for tracking all improvements/repairs of a property over time.



Decision Point: How will you address the challenge associated with residents that are unaware of the requirements and/or choosing not to follow them?



Pro-Tip: For more information on these categories, please check the Substantial Improvement/Substantial Damage Desk Reference, FEMA P-758, Chapter 5: Administering Substantial Improvement and Substantial Damage Requirements, pages 5-15.



7



COMMUNICATING DAMAGE TO PARTNERS (LOCAL/STATE/FEDERAL)

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 OFFICIALS	FEMA REGIONAL FLOODPLAIN MANAGEMENT BRANCH CHIEF	OTHER FEDERAL AGENCY OFFICIALS

At what stage in the declaration process is there interaction with the State Office of Emergency Management and FEMA?

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



Pro-Tip: Some local floodplain managers get involved in emergency activations. During the set-up of a local emergency operations center, information flows between FEMA, State, County, and local officials on the response and recovery operations of an event. It is important to know as early as possible what you will be responsible for and what county/state/federal resources will be available.



Decision Point: How do you unlock resources when there is a declaration? When the event is not declared?

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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			

Does your appeals 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?		



Pro-Tip: Information normally spreads quickly among disaster survivors. Be prepared to answer questions and advise residents. Educate yourself on the SI/SD assessment process, reconstruction methods, and available mitigation programs.

Some communities choose to send determination letters and associated correspondence by registered mail for accountability and clarity. This also provides them with useful documentation if there are questions later.



Decision Point: What is your methodology for notifying residents? Are you set up for the appeals process?

CONDUCTING THE APPEALS PROCESS

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		

The only acceptable sources of documentation are listed in the SI/SD manual. A property owner can use a method not already used by the community to appeal or refine the SI/SD determination, but may only use those listed. How will your community receive and review these requests and communicate the results of an appeal review?

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MONITORING AND REINTEGRATION

Does your community have a process for reintegrating 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 SD/SI data?