



FEMA

March 22, 2024

MEMORANDUM FOR: Regional Administrators

ATTENTION: Regional Recovery Division Directors

FROM: William C. Hagmaier
Assistant Administrator
Recovery Directorate

A handwritten signature in blue ink, enclosed in a blue oval. The signature appears to be "William C. Hagmaier".

SUBJECT: Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1

The purpose of this memorandum is to amend the *Individual Assistance Program and Policy Guide, Version 1.1* (IAPPG 1.1) to implement regulatory changes to the program. These changes constitute the largest reform of Individual Assistance (IA) regulations in 20 years and are a key part of FEMA's efforts to transform and improve the experience of disaster survivors.

FEMA received years of feedback from disaster survivors, state, tribal, and territorial governments, and other stakeholders regarding the challenges disaster survivors experience following disasters. In April 2021, FEMA formally requested public feedback on whether it was achieving its mission in its programs in a manner that advanced equity for all, including those in underserved communities, particularly for those disproportionately impacted by climate change.

Based on this feedback, FEMA published a rule in the *Federal Register* on January 22, 2024, amending regulations governing Individual Assistance to establish new benefits, simplify the application process, reduce burden, and expand eligibility. This memorandum makes corresponding edits to the IAPPG 1.1 that are required to conform with and implement the new regulations. The policy changes reflected in this memorandum are effective for disasters declared on or after March 22, 2024.

If you have any questions, please contact Frank Matranga, Director of Individual Assistance.

cc: Frank Matranga, Director, Individual Assistance
Monty LeMaire, Chief, Individuals and Households Program Service Delivery Branch
Regional Recovery Division Directors, Regions I – X

Attachment: *Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1*

Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1

This document details the updates necessary to implement the Individual Assistance Rule and amends sections of FEMA Policy 104-009-03, *Individual Assistance Program and Policy Guide, Version 1.1* (IAPPG 1.1), published on May 26, 2021, and the *Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1* memorandum issued on September 2, 2021. Unless noted in this document, all other policy guidance outlined in the IAPPG 1.1 and in the September 2021 memorandum remain in effect. This document will be in effect for all disasters declared on or after March 22, 2024.

Sequence of Delivery

Previously, FEMA regulations stipulated that some types of Other Needs Assistance (ONA) could only be provided to applicants who did not qualify for a disaster loan from the U.S. Small Business Administration (SBA). These ONA categories were known as “SBA-dependent” and included Personal Property Assistance, Transportation Assistance, and Group Flood Insurance Policy. Through the regulatory update, FEMA has removed this requirement; therefore, applicants will now be able to be considered for all types of FEMA Individuals and Households Program (IHP) assistance. Any reference to SBA-dependent ONA throughout the IAPPG 1.1 is no longer relevant. Additionally, “Figure 2: Disaster Assistance Sequence of Delivery” found at Chapter 1, Section III of the IAPPG 1.1 has been replaced by [Attachment: Figure 1](#).

Reopening of the Registration Period and Acceptance Requirements of Late Applications

As noted in Chapter 3, Section III.A.2. of the IAPPG 1.1, disaster survivors may apply for assistance after the start of the registration period. Through the regulatory update, in those rare instances when an additional county is added to the declaration after the registration period closes, FEMA will re-open the registration period to accommodate those applicants in the affected counties. Additionally, disaster survivors requesting approval to submit a late application will no longer be required to provide documentation supporting the reason for their late application.

FEMA is amending Chapter 3, Section III.A.2. to replace the “Extensions of the Registration Period” and “Late Application” sections with the following:

- **Extensions of the Registration Period:** FEMA may extend the registration period when the STT government requests more time to collect registrations from the affected population. Examples of situations when an extension may be warranted include, but are not limited to when:
 - Necessary to establish the same registration deadline for subsequently designated contiguous areas;
 - There is a continued high volume of registrations; and/or
 - There are significant barriers to registration (i.e., extended loss of electricity).
- Extensions may be approved as follows:

- The Regional Administrator, or their designee, may extend the registration period up to 60 days based on a review of the justification provided by the state, tribe, or territory (STT).
- Extensions beyond 60 days must be approved by the IA Division Director (IADD).
- **Reopened Registration Period:** After the registration period for the major disaster or emergency has expired, FEMA may reopen the registration period for the affected population for 60 days only when the President’s declaration is amended to include additional counties.
- FEMA may reopen the registration period for 60 days following the amendment of the declaration to collect registrations from the affected population included in the amendment to the declaration.
- **Late Application:** After the end of the registration period, FEMA will accept late applications for an additional 60 days. FEMA will not allow applications after the 60-day grace period. To provide justification for a late application, the applicant may call the FEMA Helpline at 1-800-621-3362 or submit a letter to FEMA, via mail, fax, upload to their online account at www.disasterassistance.gov, or in person at a Disaster Recovery Center (DRC), that explains the extenuating circumstances that prevented them from applying for assistance in a timely manner. If submitting a letter, the letter must be signed by the applicant or person whom the applicant authorizes to act on their behalf. Acceptable circumstances include:
 - Hospitalization, illness, or disability of the applicant or an immediate family member,
 - Death of an immediate family member,
 - Incarceration,
 - Victim of human trafficking,
 - On-going domestic situations where persons in the same household posed an immediate threat to other family members, resulting in a separation of the family unit,
 - Period of personal or business travel that kept the applicant out of the area for the full application period,
 - Major life events that occurred during the initial registration period (e.g., birth or adoption of a child, foster care placement, marriage, gender transition, transition of family member into or out of a residential or mental health care facility) that led to a late application, or
 - Disaster-specific circumstances.

Insurance

As noted in Chapter 3, II.A.3. of the IAPPG 1.1, FEMA provides IHP assistance to applicants for their uninsured or underinsured disaster-caused expenses and serious needs. As such, applicants are required to inform FEMA of all insurance coverage that may be available to them to meet their disaster-caused needs. Through the regulatory update, FEMA may provide financial assistance up to the financial assistance maximum award amount to cover costs not reimbursed by insurance, including deductibles and underinsured losses. The following section replaces the

“Insurance” section found at Chapter 3, Section II.A.3. in its entirety.

FEMA provides IHP assistance to applicants for their uninsured or underinsured disaster-caused expenses and serious needs (see Attachment: Figure 2 for eligibility examples). Applicants are required to inform FEMA of all insurance (flood, homeowners, renters, vehicle, mobile home, medical, burial, etc.) coverage that may be available to them to meet their disaster-caused needs. FEMA will not consider eligibility for categories of assistance that may be covered by private insurance until an insured applicant provides documentation that identifies their insurance settlements or benefits.

After an applicant submits their insurance settlement information, FEMA compares the net insurance settlement amount received for each loss to the FEMA-Verified Loss amount.

FEMA only considers insurance coverage which includes the peril(s) (e.g., flood, wind, wind-driven rain, tornado, fire, etc.) listed as a cause of damage identified for the disaster when determining eligibility for assistance. For example, an applicant is not required to submit flood insurance documents for a wind-only disaster. When applicants are impacted by multiple perils, FEMA compares insurance benefits and verified loss amount separate for each peril.

Expectations:

- **Uninsurable Items:** Insured applicants may receive assistance for items not typically covered by homeowners or flood insurance, such as wells, septic systems, access roads, etc., regardless of the type of disaster-caused damage or the applicant’s insurance coverage.
- **Delayed Settlement:** While FEMA cannot provide assistance for disaster-caused needs covered by insurance benefits, FEMA may provide assistance to help meet an applicant’s immediate needs when their insurance benefits are delayed. Two-important conditions for receiving this form of FEMA assistance are:
 - Applicants who demonstrate their insurance settlement has been significantly delayed (30 days or more from the date a claim was filed) through no fault of their own, may be considered for initial Rental Assistance.
 - Applicants accepting assistance in advance of receiving their insurance settlement must agree to repay FEMA upon receiving their insurance settlement.

Appeal Requirement

As noted in Chapter 3, Section II.C. of the IAPPG 1.1, applicants may appeal initial eligibility determinations. Through the regulatory update, FEMA is simplifying the appeal process by no longer requiring a signed, written appeal letter to accompany the supporting documentation provided by an applicant in their appeal. FEMA also created an optional *FEMA Form FF-104-FY-22-229: Individuals and Households Program (IHP) Appeal Request* that applicants may use to assist them when submitting an appeal. The following section replaces the “Appeal Submission” section found at Chapter 3, Section II.C.4. in its entirety.

An applicant has the option to submit a signed, written explanation or verifiable documentation, such as receipts, bills, repair estimates, contractor estimates, property titles, or deeds, that demonstrate the reason(s) and/or justification for the appeal. If the documentation is from a third

party, as may be the case with items such as receipts, bills, lease/housing agreements, merchant/employer/medical statements, or estimates for repairs, it must include contact information for the third party so that FEMA may verify the submitted documentation. An applicant may handwrite the third party's contact information on the receipt if it is not already included.

- If an applicant chooses to submit a written explanation for the appeal, it must be signed by the applicant or person whom the applicant designates to represent them.
- If someone other than the applicant files the appeal, the applicant must also submit a signed statement giving that person the authority to represent the applicant. An applicant may also choose to complete and submit *FEMA Form FF-104-FY-21-118: Authorization for the Release of Information Under the Privacy Act* to give another person authority to represent them. This form is available at <https://www.disasterassistance.gov/get-assistance/forms>.

All appeal submissions should include the following information to ensure the appeal is appropriately associated with the applicant's file:

- Applicant's full name,
- Applicant's FEMA Application Number and Disaster Number,
- Address of the applicant's pre-disaster primary residence, and
- Applicant's current phone number and address.

FEMA has developed an optional *FEMA Form FF-104-FY-22-229: Individuals and Households Program (IHP) Appeal Request* (see [Attachment: Figure 3](#)) which applicants may use to assist them with submitting an appeal. This form is available at <https://www.disasterassistance.gov/get-assistance/forms>.

An applicant may submit an appeal online by uploading the appeal documentation to the applicant's online account at www.disasterassistance.gov, in person at a DRC, by fax, or by mail. Appeals sent by mail must be postmarked within 60 days of the date on the applicant's eligibility notification letter. All other appeals must be received by FEMA within 60 days of the date on the applicant's eligibility notification letter.

Financial Housing Assistance

Through the regulatory update, FEMA has updated its definition of uninhabitable¹ and sanitary² to the following:

- Uninhabitable: The dwelling is not safe or sanitary.
- Sanitary: Being free of health hazards.

References to those terms throughout the IAPPG 1.1, especially in Chapter 3, Section IV, are replaced with these updated definitions.

Rental Assistance

Through the regulatory update, FEMA developed Displacement Assistance, a new type of ONA provided to applicants who must temporarily relocate from their home as a result of damage

¹ FEMA previously defined uninhabitable as a dwelling that is not safe, sanitary, or fit to occupy.

² FEMA previously defined sanitary as being free of disaster-related health hazards.

from a Presidentially-declared disaster. Displacement Assistance is intended to provide flexibility for applicants to address their short-term lodging needs via hotels, motels, friends and family, or other available options. As such, the following changes have been made to the ensuing sections of Rental Assistance as found in Chapter 3, Section IV.B. of the IAPPG 1.1. Additionally, “Figure 18: FEMA Rental Assistance Overview” has been replaced with Attachment: Figure 4.

- **Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, applicants must meet the following conditions in order to receive Rental Assistance.
 - FEMA verifies, as a result of the disaster, the pre-disaster residence is:
 - Uninhabitable and requires repairs to make the residence habitable; or
 - Unavailable due to forced relocation, such as the property owner restricting access to the property due to disaster damage or the owner taking possession of the property for their own disaster housing.
 - In rare instances, the IADD may authorize Rental Assistance eligibility for extended utility outages or inaccessibility due to access impediments or restrictions placed by federal, state, local, tribal, or territorial (SLTT) government officials, such as extended inaccessibility due to a lava flow, when Displacement Assistance is not sufficient to meet the temporary housing expenses caused by these disaster impacts.
 - Applicant is not insured or has insufficient coverage to meet temporary housing needs (e.g., Additional Living Expense (ALE), Loss of Use (LOU) coverage).
 - Applicant does not have access to adequate rent-free housing, or own a secondary or vacation home within a reasonable commuting distance, or own an available rental property that meets their temporary housing needs.
- If an applicant has a continuing disaster-caused temporary housing need once their Displacement Assistance is exhausted, they may request Rental Assistance from FEMA. Displacement Assistance and Rental Assistance are designed to serve distinct needs so Applicants are not required to show exhaustion of Displacement Assistance to request Rental Assistance.
- FEMA generally provides only one Rental Assistance award per household to assist all members of the pre-disaster household. FEMA will provide assistance to rent one housing unit per applicant unless the size or nature of the applicant’s household requires assistance to rent more than one housing unit (see IAPPG 1.1, Chapter 3, Section II).
- **Limitations and Exclusions:**
 - FEMA may award Rental Assistance to those who have received Displacement Assistance and request Rental Assistance from FEMA.
 - Applicants who meet the eligibility requirements for Rental Assistance and who submit a late application will receive Rental Assistance, without needing to make a request, because they will not qualify for Displacement Assistance.

Continued Temporary Housing Assistance

Through the regulatory update, FEMA streamlined the documentation applicants need to provide to FEMA to determine whether they are eligible for Continued Temporary Housing Assistance (CTHA). FEMA also developed *FEMA Form FF-104-FY-22-228: Supplemental Application for Continued Temporary Housing Assistance* to send to applicants who have been receiving CTHA so that FEMA can better understand their permanent housing needs and identify supportive service providers that may be able to assist them in their recovery. As such, the following replaces Chapter 3, Section IV.C.1., “Conditions of Eligibility,” through C.3., “Limitations and Exclusions,” of the CTHA portion of the IAPPG 1.1.

- **Conditions of Eligibility:** Applicants must meet the following conditions to receive CTHA.
 - Applicant was awarded initial Rental Assistance.
 - Applicant used previously awarded Rental Assistance for its intended purpose to rent alternate temporary housing.
 - Applicant is unable to return to their pre-disaster residence because it is uninhabitable, inaccessible, or not available due to the disaster.
 - Applicant does not have the financial ability to obtain housing without assistance.
 - Applicant is not receiving assistance from any other source for temporary housing.
 - To continue to receive CTHA throughout the recertification phases, applicant establishes a Permanent Housing Plan (PHP) and demonstrates progress toward achieving that plan.

- **Required Documentation:** Applicants in need of CTHA may request additional assistance by completing *FEMA Form FF-104-FY-21-115: Application for Continued Temporary Housing* or *FEMA Form FF-104-FY-22-228: Supplemental Application for Continued Temporary Housing Assistance*, as applicable, and returning the form to FEMA along with supporting documentation.
 - FEMA will send all applicants who receive initial Rental Assistance a copy of *FEMA Form FF-104-FY-21-115*.
 - FEMA uses the information collected on the *Application for Continued Temporary Housing Assistance* to verify an applicant continues to have a disaster-caused need for CTHA and to determine how much Rental Assistance the applicant may be eligible to receive.
 - Attachment: Figure 5 lists supporting documentation that must be submitted to FEMA to demonstrate current housing costs and use of previously awarded Rental Assistance or CTHA funds.
 - Upon subsequent requests for CTHA, applicants will only need to submit supporting documentation for income and housing costs if the household’s income or housing costs have changed.

- **Permanent Housing Plan:** In order to help FEMA provide appropriate resources and assistance to applicants throughout their housing recovery process, applicants will select from a list of PHPs on the *Application for Continued Temporary Housing Assistance* based on their pre-disaster housing status.
 - Achieving a PHP: As post-disaster recovery can be a challenge for all applicants,

FEMA will engage more closely to assist applicants in achieving a recovery outcome by the end of the period of assistance. FEMA will work with applicants through all recertification phases to review their progress toward their PHP and identify specific supportive service providers to assist the applicant in achieving their recovery goals. Some examples of referrals or points of contact that FEMA may provide include:

- State-led Disaster Housing Task Forces;
 - Other federal and SLTT housing resources, such as assistance available from the U.S. Department of Housing and Urban Development's Community Development Block Grant – Disaster Recovery, when authorized and available for the disaster;
 - Disaster Case Management programs, when authorized and available for the disaster;
 - Voluntary organizations, when available for the disaster;
 - Other available resources and programs, as needed.
- PHP Documentation and Timeframes: Applicants are required to submit documentation showing that they are making efforts to obtain permanent housing throughout the recertification process.
 - To allow time to identify their needs and the steps to achieve their chosen PHP, applicants will not need to submit all the documentation to support their PHP initially. They may submit documentation showing progress over time.
 - Attachment: Figure 6 CTHA Timeframes identifies the timeframes for applicants to submit documentation to support their chosen PHP. FEMA may lengthen these timeframes based on extraordinary circumstances as warranted by disaster circumstances.
 - Attachment: Figure 7 Documentation by PHP Type identifies the types of documents applicants could provide based on their PHP. Applicants will not be required to submit all the documentation listed in the table; instead, they should submit those documents that apply to their selected PHP.
 - Applicants who are not demonstrating sufficient progress will receive a letter informing them that unless they demonstrate sufficient progress by the next recertification cycle, they may be denied additional assistance.
 - Applicants who have not made progress on their PHP may continue to be eligible for CTHA when the delays are due to no fault of their own. In these cases, applicants need to explain their lack of progress is due to factors beyond their control in the *Supplemental Application for Continued Temporary Housing Assistance*. When possible, applicants should also include supporting documentation, including relevant contact information for contractors, landlords, or other applicable entities, but documents supporting their explanation are not required.
 - If the applicant does not demonstrate sufficient progress by the next recertification cycle, FEMA will send a Request for Information letter asking them to send additional documentation in the next 60 days, demonstrating progress. If the applicant does not provide documentation that demonstrates progress, they will be denied further CTHA. These applicants may appeal and resume receiving CTHA once they provided documentation demonstrating

progress.

- **Limitations and Exclusions:** Applicants must request CTHA within the period of assistance.

Home Repair Assistance

As mentioned above, through the regulatory update, FEMA has updated its definition of uninhabitable and sanitary. As such, FEMA has eliminated the previous requirement that Home Repair Assistance and Home Replacement Assistance could only be provided for disaster damaged components that were functional prior to the disaster. Instead, FEMA may now provide Home Repair Assistance and Home Replacement Assistance for disaster damaged components that may have had pre-existing conditions that were further impacted by the disaster. The following replaces Chapter 3, Section IV.E. of the IAPPG 1.1 in its entirety.

FEMA may provide financial assistance to repair an owner-occupied primary residence, utilities, and residential infrastructure, including private access routes, damaged as a result of a Presidentially-declared disaster up to the financial Housing Assistance maximum award. FEMA may provide financial assistance for the repair of disaster damage to a safe and sanitary living or functioning condition. “Functioning” means an item or home capable of being used for its intended purpose. Any one of these conditions alone can impact the uninhabitable determination.

Home Repair Assistance is not intended to return the home to its pre-disaster condition. Home Repair Assistance counts towards the financial Housing Assistance maximum award an applicant may receive.

Home Repair Assistance for accessibility items, such as access ramps and grab bars, are not limited by a financial maximum award.

- **Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, the following conditions must be met to receive Home Repair Assistance:
 - FEMA determines the dwelling was damaged by the disaster.
 - A FEMA inspection determines the applicant has disaster damage to a real property component, defined as each individual part of a dwelling, that affects the safety or sanitary conditions of the disaster damaged dwelling.
 - Absent a clear indication that the damage was not due to the disaster, FEMA representatives, using a preponderance of evidence, will act with a bias toward determining the damage is disaster-caused.
 - The disaster damage is not covered by insurance.
- FEMA may provide financial assistance for the repair of disaster-damaged real property components, including, but not limited to:
 - Structural components of a home (e.g., foundation, exterior walls, roof).
 - For mobile homes, this may include blocking, leveling, and anchoring of the mobile home and reconnecting or resetting its sewer, water, electrical, oil, and fuel lines and tanks.

- An applicant with insurance for a covered peril will be ineligible for Home Repair Assistance for insured real property components when the applicant fails to file a claim with their insurance company.
- Home Repair Assistance for flood-damaged real property in basements is limited to damaged items that result in living conditions affecting the safety, sanitation, and functionality of the home. Disaster-caused damage in a basement affecting the safety, sanitation, and functionality of the home may include:
 - Damage to the structural components (e.g., foundation) of the home
 - Damage to critical utilities that support the overall function of the home (e.g., furnace, water heater)
 - Damage to the structure's interior (e.g., doors, floor covering); limited to rooms required for the occupancy of the dwelling (e.g., occupied bedrooms, a bathroom required for the occupied bedroom, a sole kitchen or living room); and no other room in another part of the dwelling meets the need
 - Damage presenting a hazard (e.g., wet or moldy drywall, carpet, or cabinets) in non-essential living areas (for removal only)
- Home Repair Assistance award amounts are based on the value of repairs to damaged components that are of a quality necessary for a safe and sanitary living or function condition.
- Home Repair Assistance will not be provided to make improvements to a component's pre-disaster condition unless required to make the home habitable or to comply with current SLTT government building codes or ordinances, eligible hazard mitigation measures, or meet an applicant's disability-related access and functional need.

Assistance for Accessibility-Related Real Property Components

Through the regulatory update, applicants with disabilities can now use FEMA funding to make certain accessibility improvements to their homes damaged by a declared disaster. The following section supersedes the "Americans with Disabilities Act (ADA) Line Items" section of the September 2, 2021, *Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1* memorandum, which amended the Home Repair Assistance section of the IAPPG 1.1 to include a stand-alone sub-section to the Home Repair Assistance section.

FEMA may provide financial assistance for an owner-occupied primary residence under Home Repair Assistance for certain accessibility-related real property items when these items were not present prior to the disaster and are necessary to make the damaged home safe and functional for someone who has a pre-existing or disaster-caused disability. Home Repair Assistance for specific accessibility-related items is not limited by a financial maximum award.

The following accessibility-related items are eligible under Home Repair Assistance when the applicant or a member of the pre-disaster household has a disability:

- Exterior ramp.
- Grab bars.
- Paved path of travel to the primary residential entrance (for accessible ingress or egress from the applicant's vehicle to their dwelling).

- **Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, homeowners must meet the following conditions to receive Home Repair Assistance for accessibility-related items:
 - The applicant is an individual with a disability as defined by the Americans with Disabilities Act of 1990, 42 U.S.C. 12102.
 - The real property component is necessary to make the dwelling safe and functional and will meet the accessibility-related need of the household. For example, if the household already has a functioning ramp and/or paved path of travel to the residential entrance/exit, FEMA will not pay for a new one.
 - The component is not covered by insurance (i.e., Long-Term Care Insurance and Home and Community-Based Services Medicaid waivers) or provided by any other source. Otherwise, there would be a duplication of benefits issue.
 - For applicants with a pre-existing disability at the time of the disaster, a FEMA inspection records any level of real property damage to the primary residence.
 - For applicants whose disability did not exist prior to the disaster, documentation verifying that the disability was caused by the disaster.

- **Required Documentation:** To be considered for Home Repair Assistance for new accessibility-related real property items, applicants must submit the following documentation:
 - Itemized bill, receipt, or estimate for the accessibility-related item(s) and installation or construction costs; and
 - A written and signed statement from a medical, health care, or rehabilitation professional, indicating:
 - The contact information of the medical provider.
 - The disability limits one or more major life activity (i.e., seeing, walking, hearing, respiration, bending, etc.).
 - The accessibility-related real property component (i.e., exterior ramp, grab bar, and/or accessible path of travel to the residential entrance) of the dwelling is required to meet the household's disability-related need.
 - If the applicant is requesting assistance for accessibility-related items due to a disaster-related disability but did not have home damage caused by the disaster, the written and signed statement from a medical, health care, or rehabilitation professional must also include confirmation the disability was caused by the disaster.

- **Limitations and Exclusions:**
 - Home Repair Assistance is only available for owner-occupied primary residences. This means condominium and cooperative owner-occupants are not eligible for financial assistance for accessibility-related items in common areas.
 - Pre-existing accessibility-related real property components that were damaged due to the disaster are addressed in the Home Repair Assistance section of this memorandum.

Home Replacement Assistance

As mentioned above, through the regulatory update, FEMA has updated its definition of uninhabitable and sanitary. As such, FEMA has eliminated the previous requirement that Home

Repair Assistance and Home Replacement Assistance could only be provided for disaster damaged components that were functional prior to the disaster. Instead, FEMA may now provide Home Repair Assistance and Home Replacement Assistance for disaster damaged components that may have had pre-existing conditions that were further impacted by the disaster. The following replaces Chapter 3, Section IV.G. of the IAPPG 1.1 in its entirety.

FEMA may provide financial assistance to homeowners whose primary residences were destroyed as a result of a Presidentially-declared disaster. FEMA defines “destroyed” as the primary residence is a total loss or damaged to such an extent that repairs are infeasible. Home Replacement Assistance may be applied toward purchasing a new permanent residence even if the new residence’s cost is greater than the financial Housing Assistance maximum award.

FEMA calculates the replacement award amount based on average replacement costs established by FEMA for the type of residence destroyed. However, the award amount cannot exceed the financial Housing Assistance maximum award.

- **Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, applicants must meet the following conditions in order to receive Home Replacement Assistance:
 - A FEMA inspection confirms the residence was destroyed and some damage was caused by the disaster. FEMA considers a residence destroyed when:
 - Damage necessitates the replacement of the majority of two or more major structural components (e.g., basement walls/foundation, load-bearing walls, or roof assembly have collapsed);
 - Damage has completely removed the above-grade structure and only the foundation remains;
 - Flood waters have reached the roof, inundating the majority of the structure’s living area;
 - The dwelling is in imminent threat of collapse because of disaster damage; or
 - In the case of mobile homes and/or travel trailers, when the frame is visibly bent or twisted and releveling is not feasible.
 - The damage to the residence is not covered by insurance.
- **Limitations and Exclusions:** Home Replacement Assistance is only available for owner-occupied primary residences. This means Home Replacement Assistance is not available for:
 - Non-traditional forms of housing where ownership and occupancy cannot be verified (e.g., yurts and shipping containers or railroad cars converted into living quarters).
 - Landlords who do not permanently reside in the damaged dwelling. For landlords who do reside in the damaged dwelling, any available assistance is limited to the owner-occupied unit.
 - Common areas in condominium or cooperative buildings. Available assistance is limited to the owner-occupied unit.
- **Appeal Considerations:**

- If FEMA determines the residence was not destroyed by or as a result of the disaster, the applicant may appeal by submitting verifiable documentation from governing authorities giving notice of condemnation for demolition and removal, letter of substantial damage, or notice of demolition.
- After receiving appeal documentation from the applicant, FEMA will review the request to determine if another inspection is necessary in order to verify if the residence was destroyed and some damage was caused by the disaster.

Serious Needs Assistance

Through the regulatory update, FEMA developed Serious Needs Assistance (SNA), a new type of ONA which replaces Critical Needs Assistance. This section replaces Chapter 3, Section VI.B.6. of the IAPPG 1.1 in its entirety. Furthermore, any reference to CNA in the IAPPG 1.1 is replaced by SNA.

FEMA may provide financial assistance under the ONA provision of the IHP to applicants who have necessary expenses or serious needs as a result of a disaster. Serious needs may include but are not limited to: water, food, first aid, infant formula, diapers, personal hygiene items, or fuel for transportation.

SNA is intended to provide the financial means to address immediate serious needs related to sheltering, evacuation, and the temporary rise in costs of meeting basic household needs.

Generally, SNA will be available to eligible applicants who register within 30 days from the date IA is authorized for the disaster.

- **Expedited SNA:**

- Upon every declaration, the Assistant Administrator for Recovery will assess whether an expedited SNA payment to applicants is necessary based on the disaster circumstances.
- FEMA may limit these expedited payments to specific geographic areas (i.e., counties or zip codes) where FEMA determines serious needs are very likely to immediately exist based on the disaster-caused damage.
- In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, applicants within the specific geographic areas who meet the following criteria will receive an expedited SNA payment when the expedited assistance is authorized:
 - The pre-disaster primary residence is in an area declared for IA;
 - They register for FEMA assistance within 30 days from the date IA is authorized for the disaster or as extended by the IADD;
 - They report they are displaced, have a need for shelter, or have other emergency expenses as a result of the disaster; and
 - They pass FEMA's identity and occupancy verification processes.
- Applicants who apply from locations identified for an expedited SNA payment who do not meet the conditions of eligibility listed above may still be considered for SNA using the standard conditions of eligibility.

- **Standard Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, applicants who did not already receive an expedited SNA payment, if authorized, and who meet the following criteria will receive SNA:
 - The pre-disaster primary residence is in an area declared for Individual Assistance;
 - They register for FEMA assistance within 30 days from the date IA is authorized for the disaster or as extended by the IADD;
 - They pass FEMA’s identity and occupancy verification processes;
 - They report they are displaced, have a need for shelter, or have other emergency expenses as a result of the disaster; and
 - FEMA determines the applicant meets the eligibility criteria for Displacement Assistance or Clean and Sanitize Assistance; or
 - An insured applicant provides verifiable documentation from their insurance demonstrating they had disaster damage to their home.

- **Authorizing Extensions:** FEMA’s IADD may extend the 30-day timeframe to up to a total of 60 days when the affected STT government submits a written request with justification. The extension may apply to all declared areas or specific geographic areas, such as counties, municipalities, and parishes. The extended timeframe for this assistance may be considered when the request demonstrates:
 - Widespread power outages extend beyond 30 days from the date IA is authorized for the disaster;
 - Widespread continued inaccessibility, to include restrictions placed by SLTT government officials, beyond 30 days from the date IA is authorized for the disaster;
 - A high percentage of applicants, who are still applying for FEMA assistance, remain in congregate sheltering beyond 30 days; or
 - Other exigent circumstances that make the 30-day timeframe insufficient to meet disaster-caused immediate needs.

- **Award Amount:** SNA is a one-time, lump-sum award to each eligible household.
 - For fiscal year 2024, the SNA award amount is limited to \$750 per eligible household. The award amount is based on essential items, such as fuel, diapers, formula, water, food, personal hygiene, first aid, etc. The funds are intended to meet the specific needs of the eligible individual or household. FEMA will not require receipts documenting the applicant’s use of this assistance.
 - To account for cost increases, the SNA award amount will be adjusted each fiscal year based on the U.S. Department of Labor Consumer Price Index data.

- **Denial and Appeal Process:**
 - Applicants who are initially determined ineligible for SNA will receive a letter informing them of what information they need to provide to FEMA to demonstrate they have a need for the assistance. To receive a letter, ineligible applicants must meet the following conditions:

- Have a valid IHP registration;³ and
 - Apply during the SNA eligibility period.
- Applicants may become eligible by:
 - Resolving other issues impacting their eligibility, such as verifying their identity or occupancy; or
 - Demonstrating that disaster-related damage occurred to their home by showing repairs or clean-up actions were needed or were made to their home.
- **Limitations and Exclusions:**
 - Applicants temporarily residing in correctional facilities or secondary residences are not eligible for SNA.
 - Applicants residing in housing provided by an education facility and those living in an assisted living facility may receive SNA when they meet all other conditions of eligibility.
 - Applicants who apply during the eligibility period and resolve all issues impacting eligibility prior to the end of the registration period and any approved extensions may receive SNA.

Displacement Assistance

As mentioned above, through the regulatory update, FEMA created Displacement Assistance, a new type of ONA to be provided to applicants who must temporarily relocate from their home as a result of damage from a Presidentially-declared disaster. The following section will be added between IAPPG 1.1, Chapter 3, Section VI.B.6., Serious Needs Assistance, and Chapter 3, Section VI.B.7., Clean and Sanitize Assistance, which was amended by the September 2021 memorandum, *Amendment to FP 104-009-03, Individual Assistance Program and Policy Guide, Version 1.1*. Additionally, Displacement Assistance should be added to any list found in the IAPPG 1.1 that outlines or references the types of ONA for which an applicant may be eligible.

FEMA may provide financial assistance under the ONA provision of the IHP to applicants who must temporarily relocate from their home as the result of damage from a Presidentially-declared disaster. Displacement Assistance is intended to provide flexibility for applicants to address their short-term lodging needs via hotels, motels, friends and family, or other available options. Applicants with disaster-caused temporary housing needs beyond initial displacement may request Rental Assistance.

- **Conditions of Eligibility:** In addition to meeting general conditions of eligibility established in IAPPG 1.1, Chapter 3, Section II, applicants must meet the following conditions in order to receive Displacement Assistance.
 - The pre-disaster primary residence is located in an area declared for IA;
 - They register for FEMA assistance within the initial 60-day or extended registration period;

³ Invalid IHP registrations include those that failed identity verification, applied for an undesignated county or a cause of damage not included in the declaration, or applied for damage or losses that occurred outside of the incident period of the disaster.

- FEMA determines the applicant’s pre-disaster primary residence is uninhabitable, unavailable, or inaccessible or a renter’s primary residence is no longer available as a result of the disaster; and
 - They are not insured or do not have insurance that includes ALE or LOU coverage.
- **Award Amount:**
 - Displacement Assistance is awarded as a one-time, lump-sum award amount based on a timeframe established by FEMA.
 - The lump sum is based on 14 days at the nightly rate established by the respective STT government on their *FEMA Form FF-104-FY-21-114: ONA Administrative Option Selection*.
 - The STT government may select a daily rate based on the standard General Services Administration (GSA) rate, lodging reimbursement rates already used and established by the STT for similar purposes, such as state employee travel, or the rate previously established by the GSA or STT for a specific locality in the declared area.
 - The STT may update the nightly rate within 3 days of a declaration if they wish to make a change based on disaster specific circumstances.
- **Limitations and Exclusions:**
 - Applicants temporarily residing in correctional facilities or secondary residences are not eligible for Displacement Assistance.
 - Applicants living in housing provided by an education facility that do not meet the definition of “Independent” student in IAPPG 1.1, Chapter 3, Section II.B.6. are not eligible for Displacement Assistance.
 - Applicants residing in assisted living facilities are not eligible for Displacement Assistance unless they can demonstrate their housing needs are not being met by the assisted living facility.
 - Applicants who receive Displacement Assistance are not eligible to receive Lodging Expense Reimbursement, unless authorized by the IADD for those applicants approved and waiting for FEMA-provided direct housing assistance.
 - Applicants who register after the initial 60-day registration or extended registration period will not receive Displacement Assistance but may still be eligible to receive Rental Assistance.
 - Applicants who have exhausted their ALE or LOU coverage will not receive Displacement Assistance but may be considered for Rental Assistance.

Personal Property Assistance

Through the regulatory update, FEMA expanded its Personal Property Assistance authority to provide assistance to eligible individuals who lost essential tools required for self-employment and to ensure individuals and households may receive assistance to repair or replace a disaster damaged computing device. Additionally, FEMA clarified that applicants may submit verifiable documentation, such as receipts or estimates, that demonstrate items were damaged by the disaster and the cost to repair or replace those items. As such, throughout Chapter 3, Section VI.C.1. of the IAPPG 1.1 the following clarifications are made to the eligibility requirements for computing device and essential tools and the required documentation an applicant must provide

to receive assistance for disaster damaged essential tools.

- **Computing device:** Assistance is based per household on a need to replace a disaster-damaged personal computing device regardless of its intended use.
- **Essential tools:** Assistance is based on a need to replace disaster-damaged essential tools, supplies, equipment, and items required by an employer for employment, for self-employment, or required for a student applicant's or household member's education. This includes disaster-damaged tools and equipment, or other items required for a specific trade or profession, not provided or supplied by the employer. Eligible essential tool items are listed below:
 - *Schoolbooks/Supplies:* Equipment and supplies required to be provided by the applicant for educational courses or schooling, including home schooling, college, and trade school courses.
 - *Uniforms:* Required for school or work when the applicant is responsible for replacement of the uniforms.
 - *Computers:* Required by a school, an employer, or for self-employment when the applicant is responsible for the replacement of the computer.
 - *Occupational Tools:* Essential tools and equipment required for self-employment or not provided or supplied by an employer but required by an employer for employment.
- **Required Documentation:** Applicants must provide the following applicable documentation for essential tools:
 - A statement from the employer on company letterhead documenting the applicant is required to provide their own tools or computer for employment.
 - An itemized list of the tools required by the employer, also on company letterhead.
 - A statement on school letterhead documenting a computer is required and the school does not provide a computer to use outside of school, such as a laptop computer the school may loan for students to take home.
 - An itemized receipt, estimate, or bill for repair or replacement of the disaster-damaged items, when the damages are not captured at inspection.
 - A written statement signed by the applicant verifying that the items were disaster-damaged and the following statement, "I declare under penalty of perjury that the information I provided is true and correct," when the damages are not captured at inspection.
 - For self-employed applicants, a written statement from the applicant, including an itemized list of tools required for self-employment, verifying their need for the items. The statement must include "I declare under penalty of perjury that the information I provided is true and correct," and be signed by the applicant.
 - Tax return documentation to establish self-employment (e.g., Form 1040 or 1040-SR, Schedule C, etc.).

Group Flood Insurance Policy

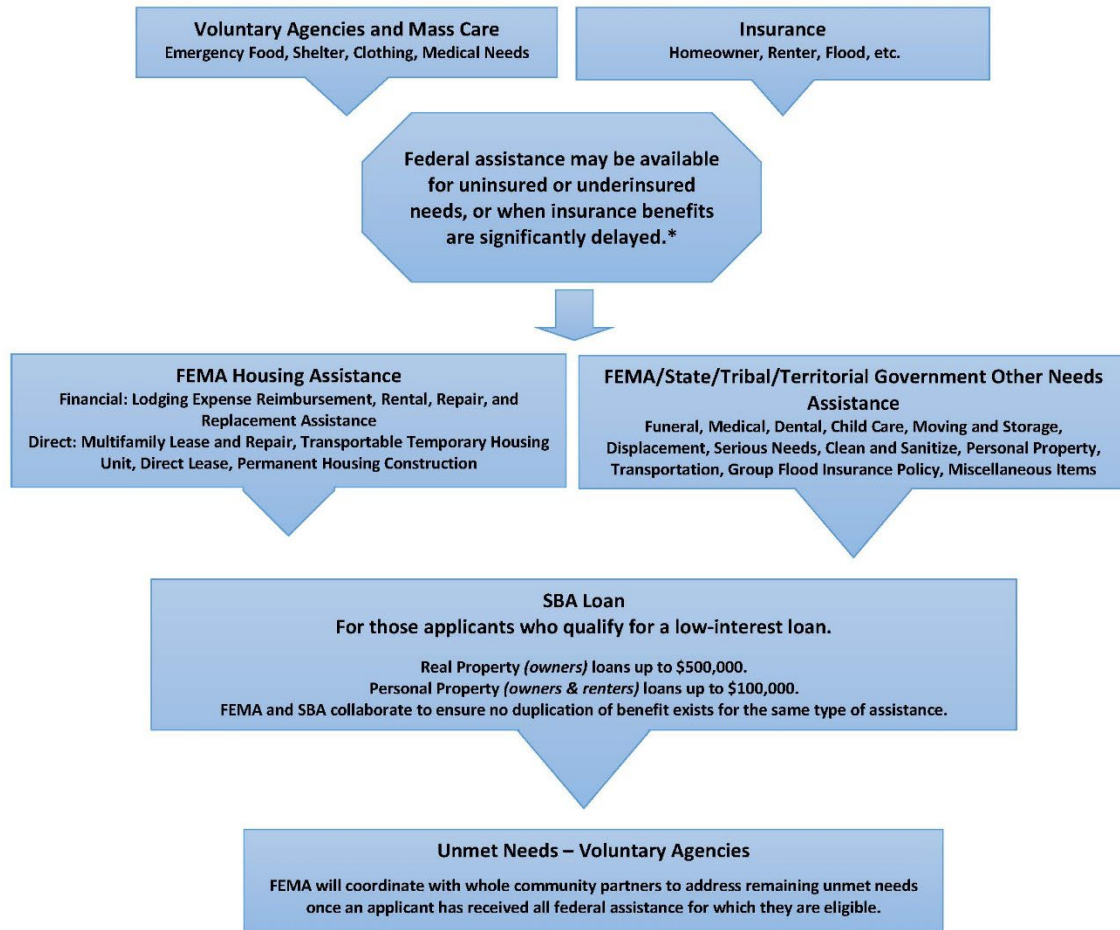
Due to the streamlining of IHP assistance so that applicants are no longer required to be denied for an SBA loan or receive a partial loan before receiving some types of ONA, additional

clarifications needed to be made to the Group Flood Insurance Policy (GFIP) section found at Chapter 3, Section VI.C.3. of the IAPPG 1.1.

The following replaces the SBA-dependent bullet under “Conditions of Eligibility.”

- Applicants who accept an SBA loan with a flood insurance requirement will not be considered for a FEMA-purchased GFIP certificate in the same disaster.
 - An applicant cannot hold two flood insurance policies on one property; therefore, FEMA will not award a GFIP certificate to this population.

Figure 1: Disaster Assistance Sequence of Delivery



*Eligibility for Federal assistance is based on each applicant’s individual circumstances as they relate to each program’s conditions of eligibility. Not all applicants will be eligible for all forms of Federal assistance.

Figure 2: Insurance Eligibility Examples

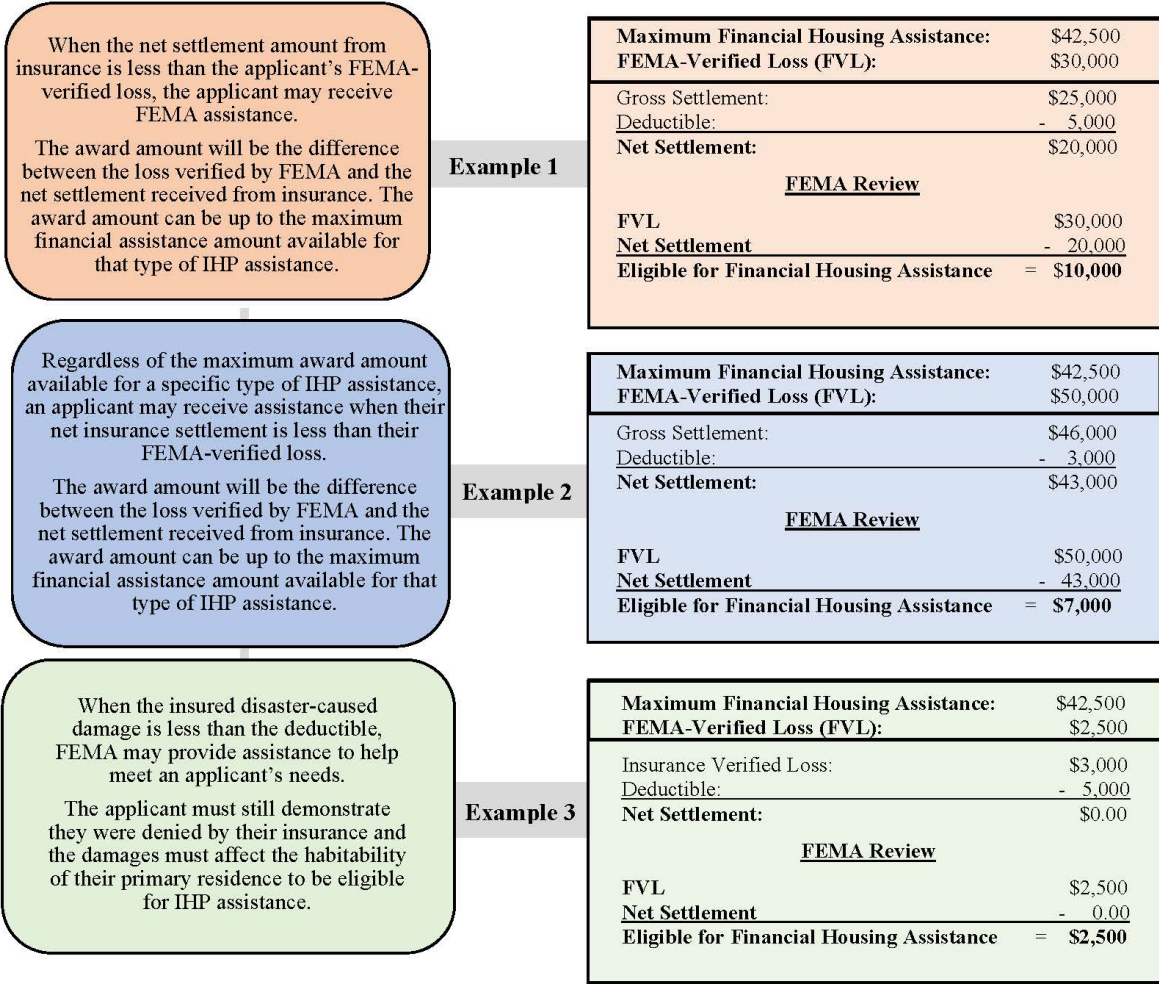


Figure 3: IHP Appeal Request Form Excerpt

If you disagree with FEMA's decision regarding disaster assistance, you have the right to appeal. To appeal, you need to send FEMA documents that show why you need assistance that FEMA hasn't approved, or if you need more money than FEMA gave you. Documents you can send include receipts, bills, repair estimates, contractor estimates, property titles, or deeds, that show why you need more help. You can use this form to give FEMA additional information that we should consider or to clarify anything in the documents that helps FEMA understand why the documents you sent show that you need assistance. Please read the decision letter FEMA sent to you for examples of the documents you should send to appeal FEMA's decision. You may also call FEMA's Helpline at 1-800-621-3362 for more information.

Note: This form is optional. You can write and sign your own explanation to send with your documents, or you can just send the documents that explain why you need more assistance without an additional explanation.

Appeals must be postmarked or submitted within 60 days of the date on your disaster assistance eligibility notification letter. Make sure you write your name, disaster number, and FEMA application number on all additional documents you send to FEMA. Supporting documents such as receipts, bills, and/or estimates must include contact information for the service provider. This completed form and supporting documentation can be submitted by:

Upload to:
www.DisasterAssistance.gov
 Click "Check Status" on the Home Page
 and follow the instructions

Fax to:
 800-827-8112
 Attn: FEMA

Mail to:
 FEMA
 P.O. Box 10055
 Hyattsville, MD 20782-8055

1. FEMA APPLICATION NUMBER <input style="width: 95%;" type="text"/>	2. DISASTER # <input style="width: 95%;" type="text"/>
3. APPLICANT NAME (LAST, FIRST, MI) <input style="width: 95%;" type="text"/>	4. PRIMARY PHONE NUMBER <input style="width: 95%;" type="text"/>
5. DAMAGED ADDRESS (NO., STREET, AND APT/LOT/UNIT NO.) <input style="width: 95%;" type="text"/>	CITY <input style="width: 95%;" type="text"/>
	STATE <input style="width: 95%;" type="text"/>
	ZIP CODE <input style="width: 95%;" type="text"/>
6. CURRENT MAILING ADDRESS (NO., STREET, AND APT/LOT/UNIT NO.) <input style="width: 95%;" type="text"/>	CITY <input style="width: 95%;" type="text"/>
	STATE <input style="width: 95%;" type="text"/>
	ZIP CODE <input style="width: 95%;" type="text"/>

Explanation/Reason for Appeal: Please explain the portion of FEMA's decision you disagree with and why. If applicable, please explain how your documentation supports your appeal request. *Note: Additional pages may be attached.*

<input style="width: 95%;" type="text"/>	<input style="width: 95%;" type="text"/>
Applicant/Co-Applicant Signature	Date

You will receive a decision letter from FEMA within **90** days of FEMA's receipt of your appeal.

To check the status of your appeal, visit www.DisasterAssistance.gov and select *Check Your Application Status*, or call FEMA's Helpline at 800-621-3362 (TTY: 800-462-7585). If you use a relay service, such as your Videophone, InnoCaption or CapTel, please provide your specific number assigned to that service. It is important that FEMA is able to contact you, and you should be aware phone calls from FEMA may come from an unidentified number.

This form is intended to assist you in submitting appeals but is not required.

Figure 4: FEMA Housing Needs Timeline (Financial)

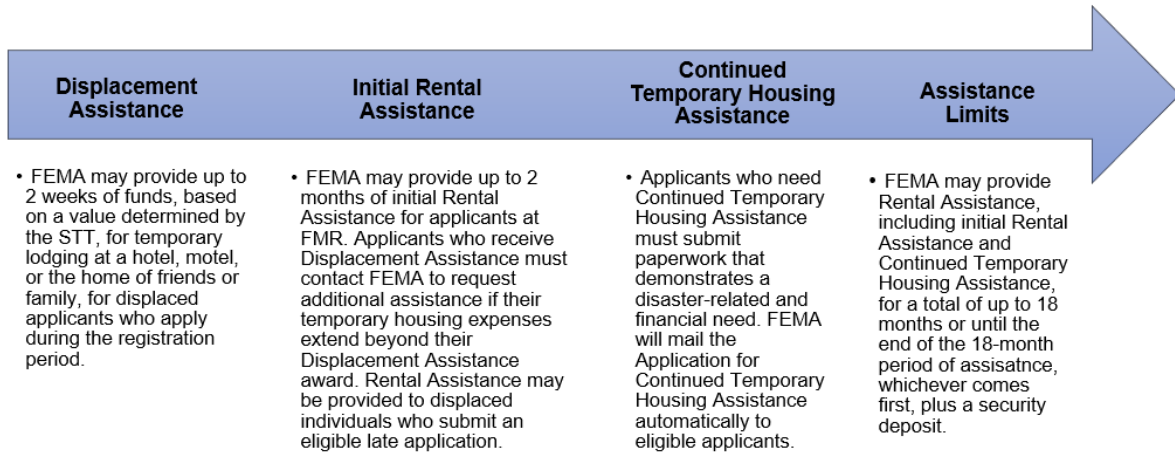


Figure 5: Continued Temporary Housing Assistance Documentation

Figure 5: Continued Temporary Housing Assistance Documentation	
Type of Documentation	Description of Documentation
Copy of current lease or rental agreement signed by the landlord and tenant	The lease or rental agreement should include location of the unit, amount of rent, duration of lease, and number of occupants.
Proof of prior Rental Assistance provided by FEMA has been used for temporary housing	<ul style="list-style-type: none"> • Rent receipts showing date, location of rental unit, and time period for which the payment applies. • If separate from the rent, receipts showing payment of essential utilities. Essential utilities are gas, electric, water, oil, trash, and sewer. • If applicable, receipt showing payment of security deposit for up to one month's rent. • In instances where rent receipts are not available, the lease or rental agreement may serve as proof of use of prior Rental Assistance. • Hotel/motel receipts showing date, address of hotel/motel, and time period for which payment applies. Only the cost of the room and taxes charged by the hotel will be considered toward acceptable exhaustion of Rental Assistance.
Proof of current post-disaster income for all members of the household 18 years and older	<p>Examples include, but are not limited to:</p> <ul style="list-style-type: none"> • Recent pay stubs. • W-2 forms or tax returns from the most recent tax year. • Documentation of self-employment, if applicable. • Documentation of government assistance, including Social Security. • Statement of no income, if applicable.
If still responsible for costs related to pre-disaster home: Proof of current housing costs for the pre-disaster home, if applicable	<ul style="list-style-type: none"> • Mortgage statement or lease/rental agreement for the disaster-damaged primary residence. • Real estate tax statement and homeowners or renters' insurance statement, if paid separately from the mortgage. • Essential utility bill(s) for the disaster-damaged primary residence: gas, electric, oil, trash, water, and sewer.

Figure 6: Continued Temporary Housing Assistance Timeframes

Figure 6: Continued Temporary Housing Assistance Timeframes	
Time Frame	Requirements and Type of Documentation
<p>Initial Recertification Phase: First two payments of CTHA</p>	<ul style="list-style-type: none"> • Applicants identify PHP on CTHA form.
<p>Intermediate Recertification Phase: Second two payments of CTHA</p>	<ul style="list-style-type: none"> • Applicants provide full documentation showing progress toward their PHP. • Applicants identify any obstacles that may impede their progress due to no fault of their own. <p><i>Note: Based on the information submitted, FEMA will identify applicants who may need additional assistance and refer them to resources such as a Disaster Case Management Program, when authorized and available for the disaster; voluntary organizations, when available for the disaster; and other available resources and programs, as needed. If applicants are not showing progress towards completing their PHP, FEMA may deny further recertification until the applicant shows progress. Applicants may appeal FEMA's decision.</i></p>
<p>Concluding Recertification Phase: Final payments of CTHA and any extension of the period of assistance</p>	<ul style="list-style-type: none"> • Applicants provide documentation showing continued progress towards completing their PHP. • Applicants identify any obstacles that may impede progress due to no fault of their own. <p><i>Note: FEMA will conduct outreach to applicants still receiving CTHA at this point to ensure the applicant's PHP is still achievable by the end of the period of assistance and identify any additional assistance applicants may need to achieve their PHP. FEMA will continue to refer applicants to available resources to assist them as needed. Based on the information submitted, FEMA may deny applicants who do not show sufficient progress.</i></p>

Figure 7: Documentation by Permanent Housing Plan Type

Figure 7: Documentation by Permanent Housing Plan Type		
Permanent Housing Plan	Pre-Disaster Housing Status	Applicants submit at least one of the following:
Repair/rebuild damaged dwelling	Homeowner	<ul style="list-style-type: none"> • Declarative statement, estimating the timeline for completion, with supporting receipts of materials purchased • Contractor estimates, agreements, or other documents identifying timelines for repairs/construction • Permits
Build new home (at damaged dwelling or new site)	Homeowner	<ul style="list-style-type: none"> • Declarative statement, estimating the timeline for completion, with supporting receipts of materials purchased • Contractor estimates, agreements, or other documents identifying timelines for repairs/construction • Permits
Purchase home	Homeowner	<ul style="list-style-type: none"> • Information on proof of progress, such as hiring a realtor, homes visited, offers submitted, closing date
Return to pre-disaster rental unit	Renter	<ul style="list-style-type: none"> • Commitment from landlord/property management to repair pre-disaster rental unit • Updates on repair progress from landlord/property management/public housing authority
Move into new rental unit within financial ability	Homeowner or Renter	<ul style="list-style-type: none"> • Proof of affordable rental housing search--rental resources contacted • Verifiable reason(s) unit unacceptable (not within financial ability, not accessible to one or more household members with disabilities, reasonable commuting distance, etc.)
Move in with family/friends	Homeowner or Renter	<ul style="list-style-type: none"> • Statement from family/friend that will be serving as landlord estimating the timeline for the move and agreeing applicant can live at the home