

CROSS DISASTER PROCESSING

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I. OVERVIEW

This section describes information that every employee <u>must</u> read *before* addressing Cross Disaster Processing.

Purpose:

- This document describes the eligibility criteria and processing decisions for applicants who register for assistance from the Individuals and Household Program (IHP) in Cross Disaster events.
 - Cross Disaster means when a declared event occurs within the 18-month financial assistance period of a previous declaration, this is also known as consecutive disasters.

Who May Get Assistance?

■ Eligible individuals and households with uninsured or underinsured, necessary expenses and serious needs resulting from events, who are unable to meet such expenses or needs through other means.

What are Eligible Expenses?

- Eligible expenses include disaster-caused expenses or needs as a result of a Cross Disaster event in all categories of IHP assistance, including:
 - Home Repair, Replacement;
 - All categories of Temporary Housing Assistance e.g.; Rental Assistance, Lodging Expenses Reimbursement (LER), Continued Rental Assistance, etc.;
 - SBA dependent Other Needs Assistance (ONA) categories;
 - Non-SBA dependent categories e.g.; Medical and Dental, Funeral, Moving and Storage, Other Miscellaneous items (Misc./Other), and Child Care; AND
 - Expedited Assistance, depending on Disaster Specific Operating Procedures (DSOP).

Basic Documentation or Verification Needed:

- Identity Verified;
- Occupancy Verified;
- Ownership Verified;

- Lack of Insurance, Settlement, or Denial Letter; AND
- Proof of Expense i.e.; receipts, estimates, FEMA Verified Loss (FVL), etc.

Other Items to Note:

- NEMIS uses data match to cross reference registrations in states, territories, and tribal areas with Cross Disaster disasters. The data matches are:
 - Applicant or co-applicant Social Security Numbers (SSN);
 - Damaged Phone Number (DPN); AND
 - o Electronic Funds Transfer (EFT).
- Refer to the <u>Disaster Specific Information</u> webpage to **VERIFY** if a Disaster Specific Operating Procedure (DSOP) exists for any of the disasters the applicant registered. If available, a DSOP will supersede this document.



II. IMPORTANT INFORMATION

This section describes information that every employee <u>must</u> read *before processing* Cross Disaster Processing.



Prior to Processing:

- For cases locked or under Program Management Section (PMS) or NCT review:
 - DO NOT process the WP if the file contains indications of being Under Review and/or locked from further processing.
 - SEND an email for review to the IHP Helpdesk.
 - INCLUDE the following on the email:
 - Subject Line: DR #, Reg #, and a subject that includes 'Under Review'.
 - **Body**: A description of the request and list of processing actions pending.
- The Cross Disaster duplication information is visible in NEMIS when the previous disaster assistance period is open.
- Once NEMIS identifies a Cross Disaster duplicate, the registration information is recorded in the Linked Regs link in web NEMIS.
- Applicants with a Cross Disaster registration are routed to the **FEMA Special Handling** queue after inspection.
- Cross Disaster registrations are reviewed and processed according to this document even if NEMIS business rules bypass the **Special Handling** queue.
- Applicants receiving Temporary Housing Assistance, financial OR direct, from a previous disaster are NOT eligible for Rental Assistance or LER for the same period in a Cross Disaster.
- Continued Rental Assistance:
 - Continued Rental Assistance is processed in the first declared disaster up to the end of the disaster financial assistance period, NOT to exceed the 18 months of assistance in a disaster.

- If initial Rental Assistance and/or Continued Rental Assistance was awarded in the Cross Disaster, the applicant is required to demonstrate exhaustion of the award before Continued Rental Assistance can continue in the previous disaster.
- Prior to reviewing or discussing Cross Disaster processing, **VERIFY** the ONA Option selection.
 - FEMA staff are authorized to process and discuss ONA in FEMA Option disasters.
 - In Joint Option disasters, only the state, territorial or tribal government is authorized to process and discuss ONA eligibility, refer to <u>Joint Option Disaster</u> Information.
 - Helpline Staff: Refer to <u>Helpline NPSC Caller Services Reference Guide for</u> additional information.
- For ONA questions in Joint Option disasters, **PROVIDE** the applicant the state, territorial, or tribal government ONA Helpline number, which is listed on the NEMIS Disaster Information (**DR Info**) button or the Web NEMIS **Disaster Info** (**F8**) link.

NOTE: If available, a Disaster Specific Operating Procedure will supersede this document.

- Individuals and Households Program (IHP) Maximum (system limit only):
 - In an effort to minimize errors, the system will generate a popup if the total combined payment exceeds \$100,000.
 - Total combined payments include (in any combination)
 - HA
 - ONA
 - Americans with Disabilities Act (ADA) related line items
 - Temporary housing and ADA related line items are NOT counted toward the financial HA and ONA maximums, so in rare instances an applicant's total award may exceed \$100,000.
 - If this happens, PLACE the case on Hold Program Review.
 - Email the IHP Helpdesk for assistance: fema-ihphelpdesk@fema.dhs.gov.

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Cross Disaster Processing Effective Date: November 12, 2020

- o **INCLUDE** the following on the email:
 - Subject Line: DR #, Reg #, and a subject that includes 'System Limit Exceeded'.
 - Body: A description of the request and list of processing actions pending.
- The Program Management Section will have to authorize this payment.



III. Process

A. Eligibility Verifications

Applicants in Cross Disaster events must meet the following criteria:

- Identity verification passed (IDV_PASS) through registration Intake or submitted documentation Identity Verification SOP.
- 2. Eligible damage is not fully covered by insurance. **VERIFY** one of the following:

NOTE: The applicant must meet the eligibility criteria of the specific type of assistance requested, i.e.; Rental Assistance, Dental, etc.

- a. There are no insurance types listed for the Cause of Damage (COD) identified;
- b. The available insurance(s) DOES NOT provide Additional Living Expenses (ALE) coverage for the COD identified;
- c. Insurance document(s) demonstrates the applicant is under-insured or denied assistance (temporary housing and/or content) for the applicable COD; OR
- d. The net insurance settlement for the structure and/or content for the applicable COD is less than the Financial Housing Assistance (HA) and/or ONA Maximum and less than the applicable FEMA-Verified Loss (FVL).
- The applicant is a Small Business Administration (SBA) = Failed Income Test (FIT)
 or is an Other Needs Assistance (ONA) referral after SBA review for Personal
 Property (PP) and Transportation (Trans).
- 4. The applicant is an SBA = **FIT** or is an ONA referral after SBA review for PP and Transportation. Refer to the <u>SBA Referrals SOP</u> for additional information.

NOTE: Eligibility processing occurs from the **FEMA Special Handling** queue. However, the WP (WP) may skip the **Special Handling** queue due to other business rules e.g., incoming mail, timer expired, WPs returned to sender, **Duplicate Resolution**, OR rejected from **FEMA Approval**.

B. Processing Eligible Assistance

 Temporary Housing Assistance: The applicant meets the eligibility requirements and is NOT receiving Temporary Housing Assistance from a previous disaster with an open assistance period.

- Use the Linked Regs link in web NEMIS to open the registration from the previous disaster and VERIFY the applicant is NOT receiving Temporary Housing Assistance e.g.;
 - i. LER;
 - ii. Rental Assistance;
 - iii. Continued Rental Assistance;
 - iv. Temporary Housing Unit; OR
 - v. Transitional Sheltering Assistance (TSA) from a previous disaster.
- If the applicant is NOT receiving Temporary Housing Assistance from the previous disaster, PROCESS the eligibility of the corresponding category of Housing Assistance (HA).
- c. **ADD** a Comment, and **ROUTE** the WP to FEMA Approval.
- Continued Rental Assistance: The applicant has received Rental Assistance awards in multiple disasters but has NOT demonstrated exhaustion of the funds.
 - a. Continued Rental Assistance is processed in the first declared disaster up to the end of the 18-month financial assistance period.
 - i. **IDENTIFY** the awards issued in the related disasters.
 - 1. If the applicant received a Rental Assistance payment in a newer disaster, the applicant is expected to demonstrate exhaustion of the award before receiving additional funds for Temporary Housing in the older disaster.
 - 2. **ADD** a **Comment** in the related registrations explaining the applicant received funds in a Cross Disaster and needs to demonstrate exhaustion of the funds before Continued Rental Assistance can occur OR continue in the older disaster.
 - a. Include the **Disaster** and **Registration Numbers** of the files with Cross Disaster match.
 - PROCESS the Continued Rental Assistance request from the older registration. ADD a Request for Recertification Documents (RRDOC) letter and USE the Remaining Funds Available text insert.
 - 4. ROUTE the WP to FEMA Complete.
 - Continued Rental Assistance must continue under the first disaster until the end of the financial assistance period OR until the applicant returns to the primary residence.
- 3. Extended Continued Rental Assistance: The applicant's displacement period has extended due to a Cross Disaster.

- a. Extended Continued Rental Assistance processing occurs when a Cross Disaster extends the applicant's displacement period because of new or additional damage to the primary residence.
 - i. When a disaster extends into a newer declaration, applicants may receive Continued Rental Assistance up to the end of the 18-month period of assistance of the first disaster. If the Cross Disaster extended the displacement period, the assistance will continue in the next disaster, once the older disaster ends.
 - ii. Applicants are NOT eligible for the month(s) of assistance paid during the older disaster.
- b. If the displacement continues as a result a Cross Disaster, applicants are ONLY eligible for the remaining of the assistance period of the Cross Disaster up to the closure date.
 - The example below represents the extended displacement caused by a Cross Disaster.

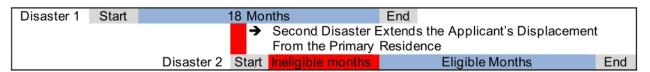


Figure 1: Extended Continued Rental Assistance - The displacement period is extended due to a second declared event.

- c. If the applicant requests Continued Rental Assistance for a Cross Disaster as a result of an extended displacement, but the documents are archived into the older registration:
 - SEND an email to the <u>FEMA-IHP-Mailroom</u> and **REQUEST** to have the documents moved into the correct file.
 - ii. ADD a Comment to the file explaining the applicant's request for Continued Rental Assistance and that the assistance needs to be processed in the cross disaster.
 - iii. **ROUTE** the WP to **FEMA Complete**.
- d. If the request for Continued Rental Assistance is archived into the correct disaster, VERIFY the applicant meets the eligibility criteria for Continued Rental Assistance, AND there are NO additional Continued Rental Assistance payments pending in the older disaster.
- e. **ADD** a **Comment** in both files and explain the Continued Rental Assistance payments will continue in the cross disaster.
- f. To allow Continued Rental Assistance payments to occur in a cross disaster, the applicant needs to receive Initial Rental Assistance first. **PROCESS** the initial Rental Assistance award and **ADD** one Supplemental Month of Rent (**ERSUPP**) to complete the three month Continued Rental Assistance cycle.
- g. ADD a Comment and Route the WP to FEMA Approval.

- 4. Temporary Housing Assistance: The applicant was able to return to the primary residence after being displaced, however a cross disaster forced the applicant to relocate again.
 - a. REVIEW the inspection report and confirm the reason(s) for the displacement. If the eligibility verifications are met, the applicant can be eligible for financial Temporary Housing Assistance including:
 - i. LER;
 - ii. Initial Rental Assistance; AND
 - iii. Continued Rental Assistance;
 - b. **ADD** a **Comment** in the older disaster file and explain the cross disaster has forced the applicant to relocate from the primary residence, and the Temporary Housing Assistance is being processed in the latest disaster.
 - c. **PROCESS** the assistance in the cross disaster starting with the initial Temporary Housing Assistance, if the award has NOT been processed already.
 - d. ADD a Comment, and ROUTE to FEMA Approval.
 - e. If the applicant requests Continued Rental Assistance after the initial Temporary Housing Assistance award, the payments will continue in the cross disaster, NOT to exceed the 18-month period of assistance.

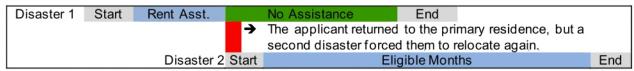


Figure 2: Example of new displacement period resulting from a cross disaster while the previous disaster is still open.

- 5. Home Repair and PP: Lines Items Recorded from a Cross Disaster
 - a. **REVIEW** the line items recorded during the inspection.
 - FEMA inspectors only record line items caused by the declared disaster.
 - ii. Refer to the <u>Appeals SOP</u> for details when processing furnaces, water wells, and septic systems.
 - b. **REVIEW** the insurance information and confirm there is no insurance, or insufficient insurance coverage for the perils recorded during inspection.
 - c. **PROCESS** the eligibility with Home Repair and/or PP items.
 - d. ADD a Comment and ROUTE to FEMA Approval.
- Replacement Housing Assistance: A Cross Disaster Destroyed the Primary Residence.

- a. USE the Linked Regs link in web NEMIS to open the registration from the previous disaster. VERIFY the applicant did NOT receive a previous Replacement Housing Assistance award for the same damage address.
 - i. **REVIEW** the inspection report and ensure the applicant meet the requirements outlined in the Replacement Assistance SOP.
 - ii. USE Eligible Replacement Assistance (ERPL), OR Eligible Replacement Assistance with Flood Insurance Required (ERPLZ). ADD a Comment and ROUTE the WP to FEMA Approval.

NOTE: Once the Replacement Assistance award is issued in the previous disaster, the applicant is no longer eligible for Home Repair in the older disaster. Special considerations can be made for uninsurable line items outside the footprint of the home i.e.; water wells, septic systems, or road and bridges. **CALL** the FEMA IHP-Helpdesk for additional details.

- 7. ONA Transportation: The Vehicle was Damaged or Destroyed in a Cross Disaster.
 - a. Repair OR Replacement Assistance is available for vehicles recorded as repairable in a previous disaster.
 - b. Eligibility includes requests for assistance with a secondary vehicle damaged in a cross disaster.
 - REVIEW the year, make, and model of the destroyed vehicle before determining eligibility.
 - 1. **DO NOT** make an eligible award for a vehicle recorded as destroyed during a previous disaster.
 - c. Refer to the <u>Transportation and Second Vehicle Request SOP</u> for processing details.
- 8. ONA Medical, Dental, Funeral, Moving & Storage, Child Care, and Misc/Other: Expenses or Loses Caused by a Cross Disaster.
 - Assistance is available for disaster caused losses and expenses when no duplication is identified under a previous disaster.
 - b. USE the Linked Regs link in web NEMIS to open the registration from the previous disaster, REVIEW the estimates or receipts archived in the older disaster, and VERIFY there were no previous award issued to the applicant for the same losses or expenses.
 - c. If the applicant meets the eligibility criteria, **PROCESS** the eligibility according to the SOP for the specific category of assistance.

- d. If the requested assistance is for additional OR continued payments for losses or expenses from a previous disaster:
 - SEND an email to the <u>FEMA-IHP-Mailroom</u> and **REQUEST** to have the documents moved into the correct file.
 - ii. **ADD** a **Comment** to the file describing the applicant's request for assistance and that the assistance needs to continue in the older disaster.
 - iii. ROUTE the WP to FEMA Complete.
- e. Applicants with continued Moving & Storage expenses as a result of a cross disaster can continue to receive assistance in the next disaster after the closure date of the first disaster.
- f. Once the documents are archived in the correct file, **PROCESS** the eligibility with the requested assistance.

NOTE: Applicants can receive assistance for Child Care in cross disasters, NOT to exceed eight cumulative weeks of assistance (per child or per household) on each disaster, or the Financial ONA Maximum as determined by the state, territorial, or tribal government per disaster.

C. Processing Ineligible Decisions

- 1. Temporary Housing Assistance Duplication of Benefits with a Previous Disaster
 - Applicants receiving Housing Assistance for the same period from a previous disaster are NOT eligible for Temporary Housing Assistance in cross disasters, including LER.
 - b. **USE** the **Linked Regs** link in web NEMIS to open the registration from the previous disaster. If the verification reflects the applicant received any of the following types of assistance in the previous disaster:
 - i. LER
 - ii. Rental Assistance:
 - iii. TSA: OR
 - iv. Eligible Readily Fabricated Unit (ERFD.)
 - c. The applicant is NOT eligible for assistance in the cross disaster.
 - i. There is no ineligible decision or denial text:
 - 1. **DELETE** the Temporary Housing Assistance pending line;
 - 2. **CALL** the applicant and explain they are being assisted with Temporary Housing Assistance under a previous disaster;
 - a. One call attempt is required.
 - 3. ADD a Contact with the details of the conversation with the applicant.

- 4. **ADD** a **Comment** explaining the details of the assistance being received from the previous disaster.
- 5. If there are no other outstanding categories of assistance to address, **ROUTE** the WP to **FEMA Complete**.
- 2. Temporary Housing Assistance Duplication of Benefits with Insurance
 - a. Applicants receiving assistance from their insurance provider for a claim from a previous disaster are NOT eligible for Temporary Housing Assistance.
 - b. **USE** the **Linked Regs** link in web NEMIS to open the registration from the previous disaster. **VERIFY** if the applicant:
 - i. Filed a claim with the insurance provider for temporary housing; OR
 - ii. Is receiving assistance with Loss of Use (LOU) or Additional Living Expenses (ALE.)
 - c. If the insurance provides coverage for the perils recorded during inspection, ADD the corresponding insurance denial decision and letter text for Temporary Housing Assistance.
 - d. ADD a Comment and ROUTE to Ineligible.

NOTE: Please remember, mobile home insurance may provide the applicant with ALE OR LOU when the COD is flood.

- 3. Home Repair and Replacement Assistance: Cross Disaster Duplication of Benefits.
 - a. Applicants who received a Replacement Housing Assistance award (ERPL OR ERPLZ) in a previous disaster may NOT eligible for Home Repair OR Replacement Assistance in a cross disaster.
 - USE the Linked Regs link in web NEMIS to open the registration from the previous disaster.
 - If the inspection information from the first disaster represents a conflict with the inspection report in the cross disaster, e.g. dwelling was destroyed in both disasters a FEMA Correction Inspection may be needed.
 - If the applicant needs for Home Repair or Replacement Assistance were met by the assistance provided during the first disaster, the applicant is NOT eligible for assistance in the new disaster. This may include desktopped items or additional payments for line items recorded in the cross disaster.
 - b. There is no ineligible decision or denial text:
 - i. **DELETE** the Temporary Housing Assistance pending line;

- ii. CALL the applicant and EXPLAIN they were assisted with Home Repair during the older disaster;
 - 1. One call attempt is required.
- iii. ADD a Contact with the details of the conversation with the applicant.
- iv. ADD a Comment explaining the details of the assistance received by the applicant from the previous disaster.
- v. If there are no other outstanding categories of assistance to address, **ROUTE** the WP to **FEMA Complete**.
- 4. ONA Medical, Dental, Funeral, Moving & Storage, Child Care, and Misc/Other: The applicant is requesting assistance for losses or expenses from the older disaster.
 - a. If the applicant submits a request for assistance, and the documents were archived in the cross disaster, VERIFY the information and determine if the request is a new occurrence or if it is a request for additional funds from the previous disaster.
 - i. If the request from assistance is related to a previous disaster, and the assistance was already awarded:
 - 1. **CALL** the applicant and explain the assistance was already provided in the older disaster.
 - a. One call attempt is required.
 - USE the Ineligible Other Reasons (IOR) denial code with the approved manual entry text: Ineligible – Unavailable Type of Assistance.
 - 3. ADD a Comment explaining the details of the request, and ROUTE to FEMA Ineligible.

D. Joint-Operation Disaster Information (ONA Only)

- 1. If processing a Joint Option Disaster:
 - a. ONA categories are only processed by the state, territorial, or tribal government.
 - b. FEMA staff is authorized to process Housing Assistance (HA) categories.
- 2. If incoming mail generates a WP to a FEMA processing queue:
 - a. **REVIEW/PROCESS** any outstanding issues within HA categories.
 - i. If an additional WP is available in a state queue such as **State Manual**, **State Appeal**, or **State Supervisor Review**, no further action for ONA is required.

- 3. If a WP is NOT available in a state, territorial, or tribal queue:
 - a. DO NOT split the WP if there are no HA categories to address.
 - ROUTE the existing WP to the State Manual Determination queue.
- SPLIT the WP if there is an HA category to address.
 - i. PROCESS the HA portion first,
 - ii. SPLIT the HA pending or eligibility line to the appropriate queue; AND
 - iii. ROUTE the original WP to the State Manual Determination subqueue.

E. Appeals

Appeals for assistance in Cross Disasters are processed using standard appeal procedures. Refer to the Appeal Processing SOP for more information.

F. Exceptions

Unique scenarios or circumstances not specifically identified within this Standard Operating Procedure (SOP) may arise.

- 1. If unable to determine eligibility using available SOPs, DSOPs or other posted information:
 - a. **CALL** the IHP Helpdesk (16) (6) or the applicable extension number or **EMAIL** to the appropriate Supervisor or Point of Contact (POC).
 - If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - 1. **SEND** a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov.).



IV. EXAMPLES AND FAQS

The following scenario assume the applicant met all verification and eligibility requirements.

Scenario 1: Assistance with Cross Disaster Continued Rental Assistance

- The applicant has been living in a temporary rental apartment while the repairs to the primary residence are completed. A cross disaster results in additional damage to the primary residence further extending the applicant's displacement period. The applicant has exhausted the assistance provided during the first disaster and demonstrated a continued need for temporary housing assistance.
 - a. Review and Processing Decision
 - Continued Rental Assistance is processed in the cross disaster when the disaster financial assistance period of the first disaster ends. Continued Rental Assistance will continue in the cross disaster up to the end of the 18month financial assistance period.
 - ii. **ADD** a **Comment** in the first disaster registration and explain that Continued Rental Assistance will continue in the cross disaster.
 - iii. **DO NOT** process back rent in the second disaster for the months of assistance paid in the first disaster.
 - iv. If the applicant has NOT received an Initial Rental Assistance award in the cross disaster, **PROCESS** the initial Rental Assistance award and **ROUTE** to **FEMA Approval** via split WP. **ADD** a new pending line and **PROCESS** one supplemental month of Rental Assistance, complete the worksheet as follows:

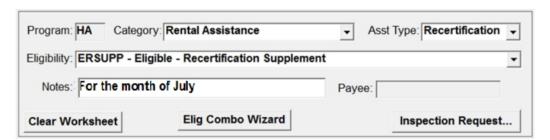


Figure 3: Worksheet details for a Supplemental Rent Payment (ERSUPP)

v. ADD a Comment and ROUTE to FEMA Approval.

Result: The applicant is eligible Continued Rental Assistance in the second disaster.

Scenario 2: Ineligible ONA determinations

- 1. The applicant submitted a copy of an estimate/receipt for Medical expenses. Upon review, the applicant was already reimbursed for the expenses during the assistance period of the previous disaster.
 - a. Review and Processing Decision
 - i. Since the applicant needs were satisfied by the award issued in the previous disaster, the applicant is NOT eligible for assistance.
 - ii. **CALL** the applicant and explain the requested assistance was awarded in another disaster. One call attempt is required.
 - iii. **ADD** a pending line and **USE** the Ineligible Other Reasons (**IOR**) denial code with the approved manual entry text: Ineligible Unavailable Type of Assistance.
 - iv. ADD a Comment explaining the details of the request and ROUTE to FEMA Ineligible.

Result: The applicant is NOT eligible for the Medical Expenses because the assistance was already provided in a previous disaster.



V. DEFINITIONS AND ACRONYMS

Definitions

Cross Disaster: When a declared event occurs within the 18-month financial assistance period of a previous declaration.

Financial Housing Assistance Maximum: Financial assistance for Home Repair and Replacement Assistance for owner-occupied homes is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor Consumer Price Index for All Urban Consumers (CPI).

Financial Other Needs Assistance Maximum: Financial assistance for Other Needs Assistance Personal Property, Transportation, Moving and Storage, Medical and Dental, Funeral, Child Care, and Miscellaneous Items is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor CPI.

Acronyms

ADA Americans with Disabilities Act

ALE Additional Living Expenses

COD Cause of Damage

DPN Damaged Phone Number

DSOP Disaster Specific Operating Procedures

EFT Electronic Funds Transfer

EHRZ Eligible - Home Repair, Flood Insurance Required

EPPZ Eligible - Personal Property, Flood Insurance Required

ERFD Eligible - Readily Fabricated Unit

ERPL Eligible - Replacement Assistance

ERPLZ Eligible - Replacement Assistance with Flood Insurance Required

FIT Failed Income Test
FVL FEMA Verified Loss

HA Housing Assistance

IDV Pass Identity Verification Passed

IHP Individuals and Households Program

IOR Ineligible Other Reasons

LER Lodging Expenses Reimbursement

LOU Loss of Use

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Misc/Other Miscellaneous Other

NEMIS National Emergency Management Information System

ONA Other Needs Assistance

PP Personal Property

RRDOC Request for Recertification Documents

SBA Small Business Administration

SFHA Special Flood Hazard Area

SOP Standard Operating Procedure

SSN Social Security Number

Trans Transportation

TSA Transitional Sheltering Assistance

WP Workpacket





VI. RELATED GUIDANCE

Please refer to the following:

- Standard Operating Procedures:
 - o Appeal Processing
 - Continued Rental Assistance
 - o Home Repair Assistance
 - o Rental Assistance
 - o Replacement Assistance
- Resources:
 - o Disaster Specific Information



FINANCIAL HA AND ONA MAXIMUM AND MINIMUM AWARDS

		*** ALL processing employees must read this section ***	
I,	Important Information	 Purpose Other Items to Note Sequence of Delivery 	2 2 3
U.	Process	 General Processing Information Financial Housing Assistance (HA) and Other Needs Assistance (ONA) Maximums and Minimums Exceptions 	4 5 5
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I. IMPORTANT INFORMATION

This section describes information that every employee must read.



Purpose:

■ The following Standard Operating Procedure (SOP) provides information on the Financial Housing Assistance (HA) and Other Needs Assistance (ONA) Maximum and Minimum Awards. The amount is adjusted for disasters declared on or after October 1 of each year according to the Consumer Price Index for the previous 12 months.

Other Items to Note:

- A minimum HA/ONA award threshold of \$50.00 was established for all disasters declared on or after July 10, 2005.
 - All applicants who have sustained disaster-caused habitability repairs or necessary expenses/serious needs with a HA/ONA total of less than \$50.00 are ineligible for assistance.

IHP Assistance Maximums	Type of Assistance	Maximum	
Financial HA Maximum	Home Repair Assistance	Adjusted annually by CPI	
Tillalicia) TIA Waxiillulli	Home Replacement Assistance	Adjusted annually by Cr 1	
	Personal Property Assistance		
	Transportation Assistance		
	Moving and Storage Assistance		
	Medical/Dental Assistance	Adjusted annually by CPI	
Financial ONA Maximum	Funeral Assistance		
I mancial ONA Maximum	Child Care Assistance		
	Assistance for Miscellaneous Items		
	Critical Needs Assistance		
	Clean and Removal Assistance		
	Group Flood Insurance Policy		
	Lodging Expense Reimbursement	A	
	Rental Assistance	Award amount based on receipts, Fair Market Rent rates, or line item amounts established by FEMA	
No Maximum Applicable	Continued Rental Assistance		
	Home Repair Assistance accessibility items		
	Personal Property accessibility items		

Table 1: Financial HA/ONA Maximums description



- Temporary Housing Assistance Financial assistance for temporary housing expenses is not limited to a maximum award amount. This includes Lodging Expense Reimbursement (LER), Rental Assistance, and Continued Rental Assistance.
 - FEMA may provide Rental Assistance, including initial and continued assistance awards, up to the 18-month period of assistance, plus one additional month when utilized for a security deposit. When the financial period of assistance is extended, the number of eligible months of Rental Assistance will also be extended.
- Accessibility-Related Losses Disaster-caused losses to accessibility-related real and personal property for applicants with a disability or other access and functional need are not subject to a financial assistance maximum award limitation. This applies to accessibility items currently awarded under Home Repair Assistance and Personal Property.
 - o U.S. Small Business Administration disaster loan referral limitations still apply.

Sequence of Delivery

- Housing Assistance (HA)
 - o Temporary Housing Assistance, if eligible; AND
 - Repair or Replacement Assistance.
- Other Needs Assistance (ONA)
 - Funeral Assistance, if there is a pending funeral review;
 - SPLIT/ROUTE the Funeral pending (PND Pending) line to the FEMA or State Funeral gueue for processing by designated staff.
 - Refer to the Funeral Assistance SOP for additional information.
 - When moving to the next eligible award in the sequence, if necessary,
 ADJUST the eligible award by one full funeral maximum amount to ensure funds are available for funeral expenses.
 - DO NOT hold/deduct funds when processing ADA item awards.
 - DO NOT delay processing other eligible funds to await a funeral decision.
 - Personal Property Assistance; AND

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Financial HA and ONA Maximum and Minimum Awards Effective Date: October 17, 2020

o All other categories, if funds are available under their respective maximum amount of assistance.



II. Process

A. General Processing Information

- 1. In all disasters, if an inspection is issued, cases that DO NOT meet the HA/ONA award threshold (less than \$50.00) as a TOTAL will be stopped in the **Special Handling** queue for a National Processing Service Center (NPSC) Review.
 - a. In FEMA Option disasters (in Special Handling or any other queue):
 - i. If the HA/ONA award would NOT meet the minimum \$50.00 threshold, PROCESS the ineligible (IID- Ineligible- Home is Safe to Occupy) for HA assistance and (IID- Ineligible Minimal or NO (category) Needs Required) for the applicable ONA assistance, if an ONA referral.
 - ii. If the HA/ONA award is \$50.00 or more, **PROCESS** the case for all applicable assistance (ensure for HA that **HRR = Yes**).
 - b. In Joint Option disasters, for applicants with pending (PND) state, territorial or tribal government ONA awards (in Special Handling or any other queue):
 - If the HA/ONA award would meet the minimum \$50.00 level, CALL IHP Helpdesk and REQUEST an exception review. The IHP Helpdesk will submit an email to coordinate with the state, territorial or tribal government for processing.
 - ii. If the HA/ONA award would NOT meet the minimum \$50.00 threshold, PROCESS the ineligible (IID- Ineligible- Home is Safe to Occupy) for HA assistance, SPLIT the workpacket (WP), and ROUTE it to the state, territorial or tribal government to process their denial.
 - c. There is NO minimum award amount for supplemental payments in any category.
 - If an applicant is initially ineligible due to NOT meeting the minimum HA/ONA award threshold and upon appeal or a request for a different category of assistance the applicant meets the \$50.00 minimum amount, PROCESS all eligible assistance.

B. IHP Award Maximums and Minimums



IHP Award Amounts (As Adjusted by the Consumer Price Index)				
Fiscal Year	Disaster Number	Financial Housing Assistance (HA) Maximum	Financial Other Needs Assistance (ONA) Maximum	HA + ONA Minimum Award
2021		36,000.00	36,000.00	\$50.00
2020	4466 - 4563	35,500.00	35,500.00	\$50.00
2019	4413 - 4454	34,900.00	34,900.00	\$50.00

Table 2: IHP Award Amounts for Years 2019 and Forward

C. Exceptions

There may be unique scenarios NOT specifically identified within this SOP that may require additional assistance.

- 1. If unable to determine eligibility using available SOPs, DSOPs or other posted information:
 - a. **CALL** the IHP Helpdesk (b) (6) or the applicable extension number) or **EMAIL** the appropriate Supervisor or Point of Contact (POC).
 - If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - EMAIL a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov)



III. ACRONYMS

Definitions

Financial Housing Assistance Maximum: Financial assistance for Home Repair and Replacement Assistance for owner-occupied homes is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor Consumer Price Index for All Urban Consumers (CPI).

Financial Other Needs Assistance Maximum: Financial assistance for Other Needs Assistance Personal Property, Transportation, Moving and Storage, Medical and Dental, Funeral, Child Care, and Miscellaneous Items is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor CPI.

Acronyms

HA Housing Assistance

IHP Individuals and Households Program

HA- IID In eligible - Home is Safe to Occupy

NPSC National Processing Service Center

ONA Other Needs Assistance

ONA- IID Minimal or NO (category) Needs Required

POC Point of Contact



FLOOD ZONES AND OTHER PROTECTED AREAS

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I. OVERVIEW

This section describes information that every employee <u>must</u> read *before addressing* questions related to flood zones and protected areas.

Purpose

■ This document outlines the eligibility of applicants who request assistance from the Individuals and Households Program with damage and expenses in a flood zone or Otherwise Protected Areas (OPA). Eligibility for IHP assistance in flood related events is defined by the location of the address and the information from the FEMA Flood Insurance Rate Map (FIRM), while observing the requirements of the National Flood Insurance Reform Act (NFIRA).

Who May Get Assistance?

■ Eligible individuals or households who sustained damage due to flood, have applied

for assistance from the Individuals and Households Program (IHP), and are in compliance with the National Flood Insurance Reform Act (NFIRA).

NOTE: Households located within an Otherwise Protected Area (OPA) are eligible for all types of IHP Assistance.

Limited Eligibility

- An eligible applicant whose pre-disaster primary residence is located within a Coastal Barrier Resource System (CBRS) Unit may NOT be considered for Home Repair Assistance, Home Replacement Assistance, Permanent Housing Construction (PHC), Personal Property Assistance, Transportation Assistance, or Moving and Storage Assistance. An eligible applicant may ONLY be considered for Rental Assistance, Lodging Expense Reimbursement, and the following types of ONA:
 - Funeral Assistance;
 - Medical Assistance;
 - Dental Assistance;
 - Child Care Assistance;
 - Critical Needs Assistance (CNA) when approved for the disaster;
 - Clean and Removal Assistance (CRA) when approved for the disaster; AND
 - Miscellaneous Other Items.



- This includes Generators required to power life-sustaining medical equipment.
- Otherwise Protected Areas (OPA): Eligible applicants residing within an OPA may be considered for all categories of IHP Assistance.
 - Applicants residing within a CBRS OPA that is considered a Special Flood Hazard Area (SFHA) can be eligible for a Group Flood Insurance Policy (GFIP) if:
 - They possess a valid building permit for the residence issued before November 16, 1991;
 - The residence was built (finished) NO later than November 16, 1991; AND
 - The residence was NOT substantially improved or damaged on or after November 16, 1991.
 - Refer to the GFIP Eligibility SOP for additional details.
- Non-Compliant (**NCOMP**): Applicants who fail to obtain and maintain flood insurance may be eligible for the following categories of assistance:
 - Temporary Housing Assistance;
 - Real Property (RP) and Personal Property (PP) items damaged by a cause of damage (COD) other than flood, including **Uninsurable** items such as water wells and septic systems;
 - ONA:
 - Medical Assistance, Dental Assistance, Funeral Assistance, Transportation, Miscellaneous Other Items, Child Care Assistance, and CNA.
 - Moving expenses: NCOMP applicants are eligible for moving expenses in excess of \$1,000 and all storage fees if all other criteria are met. Refer to Section B.1 below.

NOTE: Applicants who DO NOT obtain and maintain flood insurance are ineligible for IHP assistance for flood-damaged items in future disasters. This applies to RP and PP that is, OR will be, in a designated Special Flood Hazard Area (SFHA) and can be insured under the National Flood Insurance Program (NFIP).



- Sanctioned Communities (**SC**): A community that has NOT adopted ordinances to comply with the NFIP requirements. Applicants in Sanctioned Communities may only be eligible for:
 - Temporary Housing Assistance;
 - RP and PP items NOT damaged by flood; AND
 - ONA: Medical Assistance, Dental Assistance, Funeral Assistance, Transportation, Miscellanous Other Items, Child Care Assistance, CNA, and Moving and Storage Assistance.

Documentation and Verification Needed:

- Applicants with flood-insured losses are required to submit a flood insurance denial or settlement letter from their flood insurance provider before FEMA can determine eligibility with flood insurable losses.
- Applicants who have received a Letter of Map Amendment (LOMA) can send a copy of the letter to FEMA to request an updated review of the flood zone designation or removal of the address from the <u>NFIRA Database</u>. A <u>LOMA Application</u> can be downloaded from the FEMA website.
- Applicants can use an elevation certificate to initiate the LOMA process and appeal to the NFIP in an attempt to have the flood insurance requirement removed from the address. An elevation certificate is used when the dwelling has been elevated from its foundation to help prevent contact with flood water.

NOTE: NEMIS business rules route registrations in CBRS zones with NO flood mapping to the **FEMA Special Handling** queue.

Other Items to Note:

- Applicants who report flood damage to **RP** or **PP** during Registration Intake are always issued for inspection. These applicants will NOT be required to submit a flood insurance denial or settlement letter before being inspected.
- A flood in surance requirement is set at the time of the first Home Repair Assistance (EHRZ), Home Replacement Assistance (ERPLZ), or Personal Property Assistance (EPPZ) award, when the following conditions apply:
 - FEMA verifies flood as the COD:
 - FEMA Verified Losses (FVL) are determined as Not Insured or Insured;



- o NO flood insurance coverage on the dwelling at the time of the disaster;
- Damaged Dwelling Address (DDA) is located in flood zone A, V, or W;
- The DDA is NOT in a SC;
- The applicant, a homeowner, renter, or a former homeowner did NOT previously receive IHP financial assistance with flood requirement for the DDA or returned previous assistance for flood insurable losses within 30 days of the award determination letter date.
- Flood insurance coverage requirement after receiving IHP Assistance:
 - Applicants with a flood insurance requirement must obtain and maintain a flood insurance policy of equal or greater value than the award received from the IHP for the specific category of assistance:
 - Applicants agree to obtain and maintain flood insurance coverage on the Permanent Housing Construction (PHC) home, for at least the value of the PHC residence:
 - If the home is located in an SFHA; AND
 - The applicant incurred damaged to their pre-disaster residence as a result of flood.
- The duration of the flood in surance requirement is different for owners and renters:
 - Owners: Flood insurance coverage must be maintained at the address for as long as the address exists. If the home is sold or otherwise becomes owned by someone else, the new owner is required to purchase and maintain flood insurance.
 - If a property is later remapped and no longer determined to be in a designated SFHA, the flood insurance requirement will no longer apply.

NOTE: If housing unit is placed on the site where a NFIRA requirement was made, the requirement will stand, even if the new unit is a Travel Trailer with non-permanent foundation.

Renters: Flood insurance coverage must be maintained on the contents for as long as the applicant lives at the flood-damaged rental property. The restriction is lifted once the applicant moves from the rental unit. New renters will NOT be required to maintain flood insurance for their **PP** unless they previously received assistance for insurable flood loss while residing at the same address.



- NFIRA and the U.S. Small Business Administration (SBA):
 - The IHP observes the flood insurance requirements and compliance status as reported by the SBA.
 - o The SBA's flood in surance requirement is for the term of the loan.
 - If an IHP applicant has received a limited or partial loan from the SBA, they will NOT receive a GFIP. Refer to the GFIP Eligibility SOP for details.
 - For applicants that have an existing loan under a previous flood zone determination, the SBA requirement will be in place until that loan is paid off. The SBA will be notified of the flood zone changes to update the requirement in future disasters.
 - An applicant with an existing flood insurance requirement from an SBA loan can be determined NCOMP if the applicant defaults on the loan obligation for nonpayment.



II. IMPORTANT INFORMATION

This section describes information that every employee <u>must</u> read **before processing** applicants in Flood Zones and Protected Areas.



Prior to Processing:

- Prior to reviewing or discussing ONA eligibility for applicants living in flood zones and other protected areas, **VERIFY** the ONA Option selection.
 - FEMA staff are authorized to process and discuss ONA in FEMA Option disasters.
 - In Joint Option disasters, only the state, territorial or tribal government (STT) is authorized to process and discuss ONA eligibility, refer to <u>Section III.D</u>: <u>Joint</u> Option Disaster Information.
 - Helpline Staff: refer to the <u>Helpline NPSC Caller Services Reference Guide</u> for additional information.
- For ONA questions in a Joint Option disaster, provide the applicant with the STT ONA Helpline number, is listed on the NEMIS Disaster Information (DR Info) button or the Web NEMIS Disaster Info (F8) link.
- If the applicant reported, or the inspection recorded damage due to flood, **ENSURE** a flood mapping review was performed before determining eligibility.
 - If a flood mapping review is required, EMAIL the <u>FEMA-IHP-Flood-Mapping-Team</u> and REQUEST a manual flood mapping review.
- Applicants with a NFIRA requirement are considered compliant if, at the time of the disaster, they have an active flood insurance policy for at least the amount of the Disaster Assistance grant for which the requirement was placed. This grant amount can be found by searching the NFIRA Database and includes any EHRZ, ERPLZ, or EPPZ payments made to the applicant.
- The NFIP Database provides details about an individual's flood insurance policy, i.e. the policy effective date, expiration date, and coverage limits.



- The information located within the <u>NFIP Database</u> must NOT be used to process eligible assistance without verbal or written confirmation with the insurance company.
- For Owners, GFIP includes coverage for both RP and PP. The policy will first pay
 the structural settlement and if funds are available, any contents coverage
 remaining. The maximum coverage amount is equal to the HA and ONA
 Financial Maximum grant amounts provided by FEMA. Refer to the GFIP
 Eligibility SOP for additional information.
- Only flood mapping staff can update the CBRA and OPA fields in NEMIS.
- Applicants living in a CBRS are NOT eligible for:
 - Home Repair Assistance, Home Replacement Assistance, or PHC;
 - All residence types including boats.
 - Personal Property Assistance;
 - Transportation Assistance; OR
 - Moving and Storage Assistance.
 - PROCESS these ineligible categories of assistance as Ineligible Damaged Dwelling located in CBRS (ICBRA).
 - Applicants can appeal for assistance with these categories, please refer to Section E: Appeals.

NOTE: Applicants in CBRS and OPA are eligible for Rental Assistance and Lodging Expense Reimbursement.

- Sequence of Delivery
 - Housing Assistance (HA)
 - Temporary Housing Assistance, if eligible; AND
 - Home Repair Assistance or Home Replacement Assistance.
 - Other Needs Assistance (ONA)
 - Funeral Assistance, if there is a pending funeral review;



- SPLIT/ROUTE the Funeral pending (PND) line to the FEMA or State Funeral queue for processing by designated staff. Refer to the Funeral Assistance SOP for additional information.
- When moving to the next eligible award in the sequence, if necessary,
 ADJUST the eligible award by one full Funeral Assistance maximum amount to ensure funds are available for funeral expenses.
- DO NOT hold/deduct funds when processing ADA item awards.
- DO NOT delay processing other eligible funds to await a Funeral Assistance decision.
- Personal Property Assistance; AND.
- All other categories, if funds are available under their respective maximum amount of assistance.



III. PROCESS

A. Eligibility Verifications

The following verifications must take place when the recorded COD is flood:

- 1. NFIRA Compliance Review
 - a. **REVIEW** the <u>NFIRA Database</u> to **VERIFY** the compliance status in NEMIS.
 - CLICK on the NFIRA box.
 - a. **SELECT** an STT from the dropdown box and **CLICK** submit.
 - b. For the fastest and most comprehensive results, COMPLETE your searches in the following order:

	SEARCH by:	CLICK Submit and Then:	If Unsuccessful:
1	Tax ID# (SSN) of the Applicant		CLICK the Clear button and proceed
2	Tax ID# (SSN) of the Co-Applicant		CLICK the Clear button and proceed
3	Applicant Last Name and County	SCROLL through UPPER and Lower Case results	CLICK the Clear button and proceed
4	Co Applicant Last Name and County	SCROLL through upper and lower case results	CLICK the Clear button and proceed
5.	Damaged Property Address		CLICK the Clear button and proceed
6	Damaged Property by County	GO through the alphabet letter by letter and SCROLL through the results to find the street (look for different spellings)	Search of NFIRA Complete

NOTE: The search may result in both upper and lower case entries. Upper case entries are listed before lower case entries. Always **SCROLL** down through the results.

Table 1: Data Search Queries

- ii. To verify the flood insurance requirement, **CLICK** the applicant's name and **REVIEW** the **Assistance** box.
- REVIEW the Grant Approved Date and Grant Amount fields.
- c. If the applicant received IHP assistance for flood damage in a previous disaster and did NOT return the funds within 30 days of the first ERHZ, ERPLZ, and/or EPPZ award, a flood insurance requirement was put in place.
- REVIEW the Grant Returned Date field.



- If the applicant received IHP assistance for the damaged dwelling in a previous disaster, and the funds were returned, the applicant DOES NOT have a flood insurance requirement. Refer to <u>Examples and FAQs</u> for additional details.
- e. Once determined the applicant has a flood insurance requirement, CLICK on the web browser's Back button to access the previous screen to confirm a flood insurance policy exists.
- f. Once in the NFRA database, **SCROLL** to the right of the **Address** column and **CLICK** the **Check** link located in the **Insurance** column.
 - i. A second window will appear below the list of names and addresses.
 - ii. **ENSURE** the address in the <u>NFIRA Database</u> is exactly as it appears in NEMIS.
- g. USE the Scroll tool for the window under the address to locate the Insured Name column.
 - If the word 'None' is noted in the **Insured Name** column, a flood insurance policy is NOT active for this address.
 - ii. If a name is identified, **CLICK** on this text to review the insurance information and **ENSURE** that the policy is active.
- h. If unable to locate the applicant and/or the damaged dwelling in the NFIRA
 Database, CONDUCT a similar search in the NFIP Database by clicking on the gray NFIP Database by clicking on the screen.
- 2. Eligible damage is NOT fully covered by insurance. **VERIFY** one of the following:
 - a. There is NO insurance listed for the COD:
 - The net insurance settlement for the structure, for the applicable COD, is less than the Financial Housing Assistance (HA) Maximum or Financial Other Needs Assistance (ONA) Maximum and less than the applicable FVL;
 - c. The policy had a mandatory pay-off requirement and the net settlement for the structure after pay-off is less than the Financial HA or ONA Maximum and less than the applicable FVL; OR
 - d. A flood insurance denial or settlement letter, if applicable.
 - Refer to <u>Insurance Processing for HA and Personal Property</u> SOP for additional information including specific requirements for adding insurance settlements to NEMIS.



- 3. Verification of NFIRA compliance and flood insurance coverage:
 - a. Applicants are eligible for assistance during a 30-day grace period immediately following the date the insurance requirement was established.
 - When a flood policy is purchased, the applicant will have a 30-day waiting period before the insurance becomes effective. The applicant will NOT have insurance during this time period.
 - b. Although the insurance policy becomes effective after 30 days of purchase, if another disaster occurs during the flood insurance 30-day waiting period, the applicant is considered compliant and eligible for IHP assistance because they purchased a policy within the 30 days of the flood insurance requirement date.
 - c. Refer to Examples and FAQs for additional details.

B. Processing Eligible Assistance

- 1. Applicants who are **NCOMP** or live in Sanctioned Communities.
 - a. If all standard eligibility criteria are met, applicants are eligible for:
 - i. **RP** and **PP** items NOT damaged by flood;
 - ii. Temporary Housing Assistance;
 - 1. PROCESS eligibility for initial Rental Assistance using ENCOMP Eligible Initial Rent Non-Compliance with Flood Insurance.
 - iii. Medical Assistance, Dental Assistance, Funeral Assistance, Miscellaneous Other Items for life sustaining medical equipment, Moving and Storage expenses over \$1,000, Child Care Assistance, CNA and Transportation Assistance; AND
 - iv. Uninsurable items such as water wells and septic systems:
 - Applicants with only **Uninsurable** items recorded during the inspection will NOT require flood mapping prior to making an eligible payment for assistance.
 - a. This is only when the line items listed during inspection under the RP tab are recorded as Uninsurable and there are NO other PP items damaged by flood.



- 2. **PROCESS** the eligibility with the **Uninsurable** item and **USE EHR Eligible Home Repair**.
- v. An ineligible decision is NOT required to address the Ineligible Sanctioned Communities (**ISC**) status for flood damage unless the applicant appeals the initial eligible Home Repair Assistance decision.
- b. DO NOT use EHR and ISC for Housing Assistance (HA) at the same time. DO NOT use eligibility codes with a flood requirement (Z) for applicants in Sanctioned Communities.
- 2. Applicants Residing within CBRS.
 - a. If the standard eligibility criteria are met for the type of assistance, PROCESS eligibility for:
 - i. Rental Assistance;
 - ii. Lodging Expense Reimbursement;
 - iii. Funeral Assistance:
 - iv. Medical Assistance;
 - v. Dental Assistance;
 - vi. Child Care Assistance; AND
 - vii. Miscellaneous Other Items.
 - b. DO NOT process eligibility payments for categories of Home Repair Assistance, Home Replacement Assistance, PHC, Personal Property Assistance, Transportation Assistance, or Moving and Storage Assistance.

NOTE: When approved for the disaster, CNA and CRA will be awarded through auto-determination. There will be NO manual processing for CNA and CRA.

C. Processing Ineligible Decisions

- 1. Ineligible Assistance for Applicants in a Sanctioned Community.
 - Applicants are NOT be eligible for Home Repair or PP line items damaged by flood, Insured or Not Insured, when the following conditions are true:



- i. The COD is recorded as flood;
- ii. Primary residence is in a flood zone A, V, or W; AND
- iii. Primary residence is in a SC.
- b. **PROCESS** the initial ineligible decision, **USE ISC Ineligible Sanctioned Community** for owners and renters found ineligible for RP or **PP** items.
 - i. If the applicant has a flood insurance requirement from a previous FEMA disaster, the applicant will NOT be eligible for Moving and Storage expenses less than \$1,000. NFIP covers the first \$1,000 in Moving and Storage expenses.
- Applicant is Non-Compliant: Did NOT buy or maintain flood insurance after a previous home repair or PP award with flood requirement.
 - a. **NCOMP** applicants are ineligible for insurable flood damaged items when:
 - The date of loss for the second declared disaster exceeds the 30-day flood insurance waiting period; AND
 - ii. The applicant did NOT secure a flood insurance policy.
 - b. PROCESS the ineligible decision and USE NCOMP Non-Compliant with Flood Insurance Requirement.
- Applicants Residing within CBRS.
 - Applicants within CBRS are NOT eligible for Home Repair Assistance, Home Replacement Assistance, or PHC for **Insured** or **Not Insured** flood-damaged line items.
 - PROCESS as ineligible and USE ICBRA Ineligible Damaged Dwelling Located in CBRS for owners and renters.
- 4. Sanctioned Community: Special Considerations
 - a. If a community was participating in the NFIP but later becomes non-compliant, the community is considered a **SC**. The existing flood insurance coverage will remain in effect until it expires but CANNOT be renewed.



b. Applicants in a SC are NOT eligible to receive assistance for Insured or Not Insured flood damaged RP or PP line items. However, these applicants may be eligible if the community qualifies for, and enters the NFIP, during the six-month period following the declaration.

D. Joint Option Disaster Information (ONA Only)

- If Processing a Joint Option Disaster:
 - a. ONA categories are only processed by the STT.
 - b. FEMA staff is authorized to process Housing Assistance (HA) categories.
- 2. If incoming mail generates a Workpacket (WP) to a FEMA processing queue:
 - a. **REVIEW/PROCESS** any outstanding issues within HA categories.
 - If an additional WP is available in an STT processing queue, such as State Manual, State Appeal, or State Supervisor Review, no further action for ONA is required.
 - ii. If an additional WP is NOT available in an STT processing queue; AND
 - 1. There are NO HA categories to address:
 - a. **ROUTE** the existing WP to the **State Manual Determination** queue.
 - 2. There are HA categories to address:
 - a. On the **Confirmation** screen, **SELECT** the appropriate **Routing** location for all HA categories;
 - SELECT State Manual Determination for all ONA categories; AND
 - c. CLICK Submit.

E. Appeals

- 1. Home Repair Assistance and Personal Property Assistance for Applicants in a Sanctioned Community:
 - a. Applicants may be considered eligible for flood damaged **Insured** or **Not Insured** Home Repair or PP line items if the SC enters the NFIP during the six-month period following the disaster declaration.



- i. This information may be provided to the Systems Administration (SA) team by the Region, Hazard Mitigation, Flood Mapping, or from other sources.
- b. If the applicant submitted information demonstrating the community has entered the NFIP, **EMAIL** the <u>FEMA-IHPHelpdesk</u> with the information.
 - i. SA will forward the request for participation to the NFIP who will verify the compliance and may remove the **SC** status.
 - ii. SA will ensure that all cases are available for processing when notified of a community's status change.
- Appeals to request the removal of the damaged address from the <u>NFIRA</u> Database.
 - a. Applicants can appeal the flood insurance requirement status by submitting a LOMA or evidence of updated flood maps demonstrating the home is NO longer within an SFHA.
 - b. **EMAIL** the <u>FEMA-IHP-Flood-Mapping-Team</u> to verify if the damaged address is no longer within a SFHA area.
 - i. The email must include:
 - Disaster number;
 - 2. Registration number; AND
 - Document number.
 - c. A new flood mapping will confirm the applicability of the flood insurance requirement.
 - d. The applicant will receive a letter notifying them about the change in the flood insurance requirement.

F. Exceptions

There may be unique scenarios NOT specifically identified within this SOP that may require additional assistance.

- If unable to determine eligibility using available SOPs, Disaster Specific Operating Procedures, or other posted information:
 - a. CALL the IHP Helpdesk (b) (6) or the applicable extension number) or EMAIL the appropriate Supervisor or Point of Contact (POC).





- If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - 1. **EMAIL** a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov).



IV. EXAMPLES AND FAQS

The following section describe common processing scenarios.

Example 1: Eligibility in a Flood Zone

- 1. An applicant registered for assistance stating that his home, PP, and vehicle were damaged by flooding. He also stated that the Child Care center where his children attended was destroyed and they were now in a more expensive center. He reported that he had a standard homeowner's policy with NO riders. The applicant has NO plans to relocate permanently outside of the CBRS. What assistance could FEMA provide the applicant?
 - a. The inspection report returned with:
 - i. COD = Flood
 - ii. Repairs Required? = Yes
 - iii. Temporary Relocation = Yes
 - iv. SBA status = FIT
 - b. Flood mapping determined the damaged dwelling is located in a CBRS. **USE** the table below to determine the applicant's eligibility.

	Type of Assistance	Remains	in CBRS	Relocates fro	m CBRS
HA	Initial Rental Assistance	Eligible		Eligible	
HA	Continued Temporary Housing Assistance	Eligib <u>l</u> e		Eligible	
HA	Lodging Expense Reimbursement	Eligible		Eligible	
HA	Home Repair Assistance		Ineligible		Ineligible
HA	Home Replacement Assistance		Ineligible		Ineligible
HA	Permanent Housing Construction		Ineligible		Ineligible
ONA	Personal Property Assistance		Ineligible		Ineligible
ONA	Transportation Assistance		Ineligible		Ineligible
ONA	Moving and Storage Assistance		Ineligible		Ineligible
ONA	Child Care Assistance	Eligible		Eligible	
ONA	Funeral Assistance	Eligible		Eligible	
ONA	Medical Assistance	Eligible		Eligible	
ONA	Dental Assistance	Eligible		Eligible	
ONA	Critical Needs Assistance	Eligible		Eligible	
ONA	Clean and Removal Assistance	Eligible		Eligible	
ONA	Miscellaneous Other Items	Eligible		Eligible	

Table 2: Determining eligibility in CBRS



Result: Since the damaged residence is located in a CBRS, FEMA can only assist with Rental Assistance, Continued Temporary Housing Assistance, and Child Care Assistance.

Example 2: NFIRA Compliance and Eligibility for Insured Applicants.

- 1. The applicant received an EHRZ award on 5/12. The eligibility letter explained to the applicant the requirement to obtain a flood insurance policy within 30 days of the letter. The applicant purchased a flood insurance policy of equal or greater value than the EHRZ award received from FEMA, and the insurance agent notified the applicant of the 30-day waiting period before the policy takes effect.
- 2. The applicant's property was again affected by another flood event on 6/23, almost two weeks before the flood insurance waiting period ends. The disaster is declared on 7/12 and the applicant submitted a copy of the insurance declaration page demonstrating the policy will NOT be in effect until 7/11. What is the applicant's eligibility in regard to NFIRA compliance and IHP?
- 3. The table below represents the timeframe between the date of the flood insurance requirement and the applicant's flood insurance effective date.



Table 3: Flood insurance requirement, waiting period, and coverage timeframes.

4. Since the purchase of the flood insurance occurred on 6/10, the applicant met the 30-day grace period to acquire a flood insurance policy, and therefore the applicant is compliant with the flood insurance requirement. Although the applicant has a flood insurance policy, the applicant is considered uninsured for the flood damage of 6/23 because the flood insurance policy will NOT be in effect until 7/11.

Result: The applicant is eligible for IHP assistance for the **RP** and **PP** damage resulting from the 6/23 flooding event.

Frequently Asked Questions:



1. What are the available eligibility codes for applicants with RP or PP damage and flood insurance?

	Initial decision	Second decision	Appeal
HA	INSFI (Auto-D status)	Initial INFI or Initial EHR(Z)/EPP(Z)	A-INFI or
			Initial A-EHR(Z)/EPP(Z)
HA	INFI (Manual)		A-INFI or
			Initial EHR(Z)/EPP(Z)
PP	INS (Auto-D status)	Initial INFI or Recon EHR(Z)/EPP(Z)	A-INI or
			Initial A-EHR(Z)/EPP(Z)
PP	INI (Manual)		A-INI or
			Recon EHR(Z)/EPP(Z)

Table 4: Eligibility Overview and Codes

2. Can the applicant return the award to avoid the flood insurance requirement?

- a. Applicants can decline IHP assistance to avoid the flood insurance requirement. In order to avoid the flood insurance requirement, the applicant must return all the disaster assistance received for flood insurable RP and PP NO later than 30 days from the date of the award determination letter from FEMA.
 - i. Refer to the <u>Return Reissue of IHP Financial Assistance</u> SOP for details about the available options to return IHP funds to FEMA.
 - ii. FEMA will use the date on the envelope postmark to determine if the funds were returned before the 30 days expire. This ensures the applicant's request is processed fairly in case there are delays in the transit of the correspondence.
- b. Once the funds are logged as returned in NEMIS, a WP is created into the **FEMA Supervisor Review Reissue** subqueue. Staff assigned to this queue will:
 - ACCESS the WP with returned funds.
 - ii. **EMAIL** the <u>FEMA-IHPHelpdesk</u> and **REQUEST** the SA team to review the applicant's request to have the flood insurance requirement removed. The email must include:
 - 1. **Summary Line:** Removing DD Address from GFIP Database
 - Body: INCLUDE the disaster and registration numbers, applicant's name, number and amount of the returned award, and a brief explanation of the applicant's request.
 - SA staff will REVIEW the request, UPDATE as necessary, and ADD a Comment to the file.
- c. SELECT Reissue = NO.



- d. **ADD** a **Comment** to the file indicating the applicant is returning the funds to have address removed from the flood insurance requirement database.
- e. ROUTE the WP to FEMA Complete.
- f. Once the flood insurance requirement is removed from the <u>NFIRA Database</u>, the applicant will continue to be uninsured and compliant for the next flood related disaster.
- 3. How to determine if the NFIRA compliance information in NEMIS is correct?
 - NFIRA information in NEMIS will be accurate if the DDA is recorded the same in NEMIS as in the NFIRA Database.
 - b. The NFIRA information in NEMIS may be inaccurate after post-registration changes or updates to the DDA. This is NOT always reflective of a prior disaster requirement placed on the address. It may be the result of a subsequent automation for NFIRA compliance verification.
 - VERIFY if the status of the NFIRA field in NEMIS, if the status is NFIRA Compliance = No because of assistance provided in a previous disaster, the applicant is NCOMP.
 - ii. If the status on the NFIRA field in NEMIS is NFIRA Compliance = No because of a modification to the damaged dwelling address, or by a returned inspection after the requirement has been placed (NO assistance in prior disasters), the NFIRA Compliance status in NEMIS requires correction to reflect NFIRA Compliance = Yes. The applicant is compliant and should be reviewed for eligible assistance.
 - iii. If the status of the **NFIRA** field in NEMIS is **NFIRA** Compliance=Yes, the applicant is compliant and requires a review for eligibility.
 - iv. If the **Flood Zone** field in NEMIS is **blank** or conflicts between flood zones and information within the <u>NFIRA Database</u>, **PLACE** the case on **Hold**, **ADD** a **Comment** to the file, and **EMAIL** the <u>FEMA-IHP-Flood-Mapping-Team</u>.
 - c. Once the response is received from the Flood Mapping Department, **PROCESS** the eligible categories of assistance.
- 4. What are the available eligibility codes when processing applicants in CBRS?
 - use the following table to determine the eligibility codes for applicants living in a CBRS.



Assistance Type	Available if in CBRS	Eligibility Code
Rental Assistance	Yes	ECBRA
Rental Assistance due to Inaccessibility	Yes	ERIA
Rental Assistance due to Utility Outage	Yes	ERU
Lodging Expenses Reimbursement	Yes	ETR
Continued Temporary Housing Assistance	Yes	ERCT
Supplemental Rental Assistance	Yes	ERSUPP
Direct Housing (THU) if units are located OUTSIDE of the CBRS	Yes	ERFD
Direct Housing (THU) if units are located INSIDE of the CBRS	No.	ICBRA
Home Repair Assistance	No.	ICBRA
Home Replacement Assistance	No.	ICBRA
Permanent or Semi-Permanent Construction	No.	ICBRA
Personal Property Assistance	No.	ICBRA
Medical Assistance	Yes	EMED
Dental Assistance	Yes	EDTL
Funeral Assistance	Yes	EFNL
Child Care Assistance	Yes	APVD
Miscellaneous Other Items	Yes	EMISC
Moving and Storage Assistance	No.	ICBRA
Transportation Assistance	No.	ICBRA
Critical Needs Assistance – Auto-generated	Yes	ECNA
Clean and Removal Assistance – Auto-generated	Yes	EMISC
Crisis Counseling, Disaster Unemployment Assistance, Disaster Legal Services	Yes	N/A

Table 5: Assistance Type and Eligibility Code Chart

5. How flood insurance requirement affects IHP eligibility?



				Federal Disaster Assistance (3)			
Community Status	Previous Flood Insurance Purchase Requirement for Damaged Dwelling(1)	Flood Insurance Policy	Special Flood Hazard Area (SFHA)	IHP except for Real or Personal Property (2)	All IHP Assistance	SBA Loans	
	No	No	Inside SFHA	N/A	✓	<i>-</i>	
	No	No	Outside SFHA	N/A	~	✓	
Participating Community	No	Yes	Outside SFHA	N/A	 ✓ (subject to FEMA's policy on insurance) 	✓ ·	
	Yes	No	Inside SFHA	✓	N/A	N/A	
	Yes	Yes	Inside SFHA	N/A	 ✓ (subject to FEMA's policy on insurance) 	~	
Sanctioned Community	No	No	Inside SFHA	✓	N/A Caveat - If the community joins within 6 months of disaster, the applicant may be eligible to receive all IHP Assistance and SBA.	NVA Caveat - If the community joins within 6 months of disaster, the applicant may be eligible to receive all IHP Assistance and SBA.	
	Yes	No	Inside SFHA	✓	N/A	N/A	
	No	No	Outside SFHA	N/A	✓	✓	
Not Participating (Not Mapped)	N/A	N/A	Not Mapped, No SFHA Identified	N/A	✓	·	
	HART LEGEND ible for the Assistance		,				

Figure 1: Relationship between IHP Assistance and Flood Insurance

a. Table legend:

- For owners, NFIRA Requirements are placed on the address and NOT the individual. For renters, NFIRA Requirements are placed on the individual at the address. If a renter moves from that address, the NFIRA requirement DOES NOT move with the renter.
- ii. Applicants are still eligible to receive IHP assistance for non-flood insurable items, which includes temporary housing and non-SBA-dependent categories of assistance, i.e. Medical Assistance, Child Care Assistance, Dental Assistance, Funeral Assistance, and Miscellaneous items.
- iii. All other forms of Individual Assistance; i.e. Crisis Counseling, Disaster Unemployment Assistance, Disaster Legal Services, and Disaster Case Management are available to the eligible applicants regardless of flood insurance requirement.
- 6. What are the eligibility criteria for applicants living in Sanctioned Communities?



Sanctioned Status	Owner, Renter, OR Both	SFHA A, V OR W	Cause of Damage	Category of Assistance Requested	Insured, Not Insured, or Uninsurabl e Items	Assistance Provided
No	Both.	No	Flood	Home Repair Assistance and Personal Property Assistance	All	PROCESS all items using standard procedures.
No	Both.	Yes <u>.</u>	Flood	Home Repair Assistance and Personal Property Assistance	All	PROCESS all items using standard procedures.
Yes	Both.	No	Flood	Home Repair Assistance and Personal Property Assistance	AII	 a. PLACE the workpacket on Hold, Current User. b. EMAIL the FEMA-IHP-Flood-Mapping-Team to verify in which flood zone the home is located. c. If response from Flood Mapping indicates the home is NOT located in either flood zone A, V, or W, then PROCESS all items using standard procedures. d. If response from Flood Mapping indicates the home is located in either flood zone A, V, or W and the NFIRA Box has been updated, PROCESS Uninsurable items using standard procedures. Home Repair Assistance and Personal Property Assistance = ISC.
Yes	Both	Yes	Wind/Rain	Home Repair Assistance and Personal Property Assistance	All	a. PROCESS all items using standard procedures





Sanctioned Status	Owner, Renter, OR Both	SFHA A, V OR W	Cause of Damage	Category of Assistance Requested	Insured, Not Insured, or Uninsurabl e Items	Assistance Provided
Yes	Both	Yes	Flood	Home Repair Assistance and Personal Property Assistance	Uninsurabl e only	a. PROCESS Uninsurable items using standard procedures.
Yes	Both	Yes	Flood	Home Repair Assistance and Personal Property Assistance	Insured and Not Insured	a. Not eligible for Home Repair Assistance. Personal Property Assistance available if applicant permanently moves from SFHA.

Table 6: Sanctioned Community Processing Scenarios



V. DEFINITIONS AND ACRONYMS

Definitions

CBRA: The Coastal Barrier Resources Act (CBRA) of 1982 and later amendments, removed the Federal government from financial involvement associated with building and development in undeveloped portions of designated coastal barriers (including the Great Lakes). These areas were mapped and designated as Coastal Barrier Resources System (CBRS) units or "otherwise" protected areas. The Act banned the sale of NFIP flood insurance for structures built or substantially improved on or after a specified date. For the initial CBRA designation, this date is October 1, 1983. For all subsequent designations, this date is the date the CBRA zone was identified.

Financial Housing Assistance Maximum: Financial assistance for Home Repair Assistance and Home Replacement Assistance for owner-occupied homes is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor Consumer Price Index for All Urban Consumers (CPI).

Financial Other Needs Assistance Maximum: Financial assistance for ONA Personal Property Assistance, Transportation Assistance, Moving and Storage Assistance, Medical Assistance, Dental Assistance, Funeral Assistance, Child Care Assistance, and Miscellaneous Other Items is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor CPI.

Flood Insurance Grace Period: The 30-day grace period is the time limit to purchase a flood insurance policy. Applicants with existing insurance policies have 30 days from the expiration date of the policy to renew the insurance contract.

Flood Insurance Rate Map (FIRM): The official map of a community on which FEMA has delineated both the special hazard areas and the risk premium zones applicable to the community.

Flood Insurance Waiting Period: The period for a new flood insurance policy to take effect, usually 30 days from the date of purchase.

Flood Zone: SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year.

Flood Zone A: Areas subject to inundation by the one-percent-annual-chance flood event generally determined using approximate methodologies. Because detailed hydraulic analyses have NOT been performed, NO Base Flood Elevations (BFEs) or flood depths are shown. Mandatory flood insurance purchase requirements and floodplain management standards apply.

Flood Zone V: Areas along coasts subject to inundation by the one-percent-annual-chance flood event with additional hazards associated with storm-induced waves. Because detailed





hydraulic analyses have NOT been performed, NO Base Flood Elevations (BFEs) or flood depths are shown. Mandatory flood insurance purchase requirements and floodplain management standards apply.

Flood Zone W: FLD ZN code "W" identifies damaged dwellings located in a regulatory floodway, zone AE as shown on the Flood Insurance Rate Maps (FIRM) and Digital Flood Insurance Rate Maps (DFIRM). A "Regulatory Floodway" means the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height. Mandatory flood insurance purchase requirements and floodplain management standards apply.

Letter of Map Amendment (LOMA): Is an official amendment, by letter, to an effective National Flood Insurance Program (NFIP) map. A LOMA establishes a property's location in relation to the Special Flood Hazard Area (SFHA). LOMAs are usually issued because a property has been inadvertently mapped as being in the floodplain but is actually on natural high ground above the base flood elevation.

Otherwise Protected Areas: OPAs are undeveloped coastal areas established under Federal or state, local, territorial, or tribal government (SLTT) law; or held by a qualified organization, primarily for wildlife refuge, sanctuary, recreational, for natural resource conservation purposes.

Sanctioned Community: Sanctioned Community means a community in which FEMA has identified SFHAs on a Flood Insurance Rate Map (FIRM) and the community has failed to join the NFIP within one year of the FIRM being published.

Acronyms

CBRA Coastal Barrier Resource Act

CBRS Coastal Barrier Resource System

COD Cause of Damage

DDA Damaged Dwelling Address

DR Disaster

EHR Eligible Home Repair

EPPZ Eligible PP with Flood Insurance Requirement

ERPLZ Eligible Replacement Assistance with Flood Insurance Requirement

FIRM Flood Insurance Rate Map



FIT Failed Income Test

FVL FEMA Verified Loss

GFIP Group Flood Insurance Policy

HA Housing Assistance

HRR Habitability Repairs Required

ICBRA In eligible Damaged Dwelling located in CBRA or OPA

IHP Individuals and Households Program

INFI In eligible Flood Insurance

INI Insured Ineligible

INS Insured - Auto determined

INSFI Ineligible Flood Insurance - Auto determined

ISC In eligible Sanctioned Community

LOMA Letter of Map Amendment

NCOMP Non-Compliant

NFIP National Flood Insurance Program

NFIRA National Flood Insurance Reform Act

ONA Other Needs Assistance

OPA Otherwise Protected Areas

PHC Permanent Housing Construction

POC Point of Contact

PP Personal Property

SBA Small Business Administration

SC Sanctioned Community



SFHA Special Flood Hazard Area

SLTT State, local, territorial, or tribal government

SSN Social Security Number

STT State, territorial, or tribal government

THU Temporary Housing Unit



VI. RELATED GUIDANCE

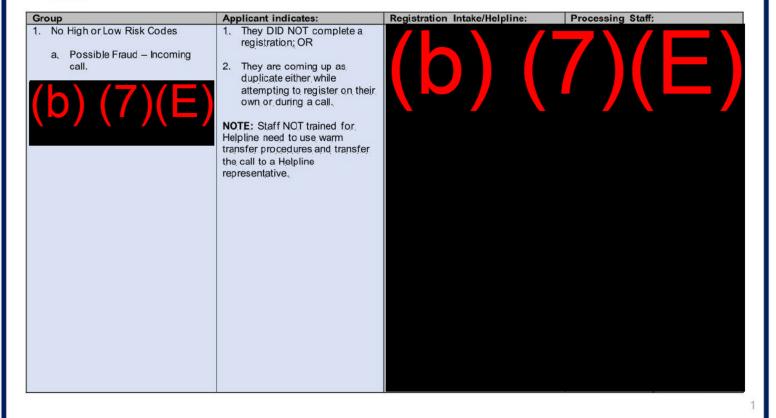
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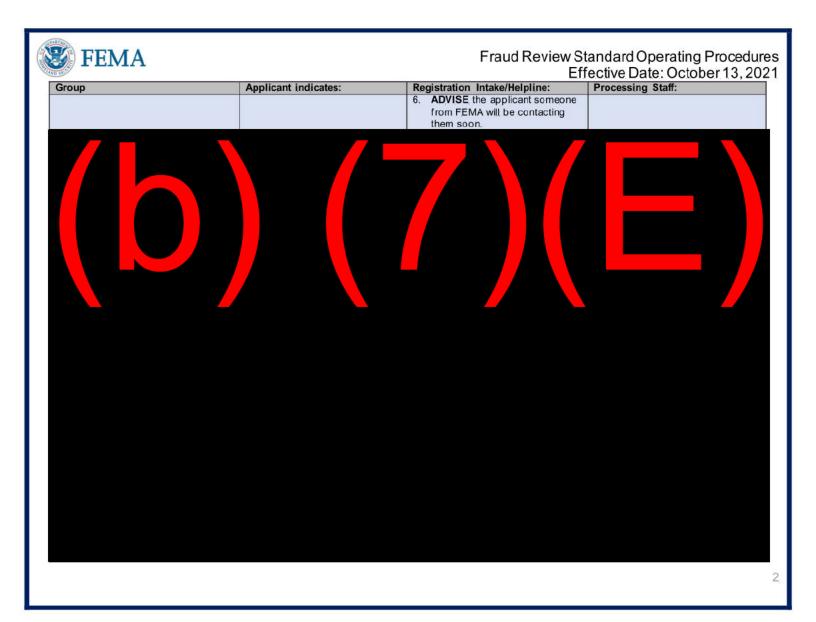
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 - Continued Temporary Housing Assistance
 - Funeral Assistance
 - GFIP Eligibility
 - Insurance Processing for HA and Personal Property
 - o Moving and Storage
 - o Rental Assistance
 - Return Reissue of IHP Financial Assistance
 - Special Handling Queries
- Resources
 - Helpline NPSC Caller Services Reference Guide
 - LOMA Application
 - NFIP Database
 - NFIRA Database

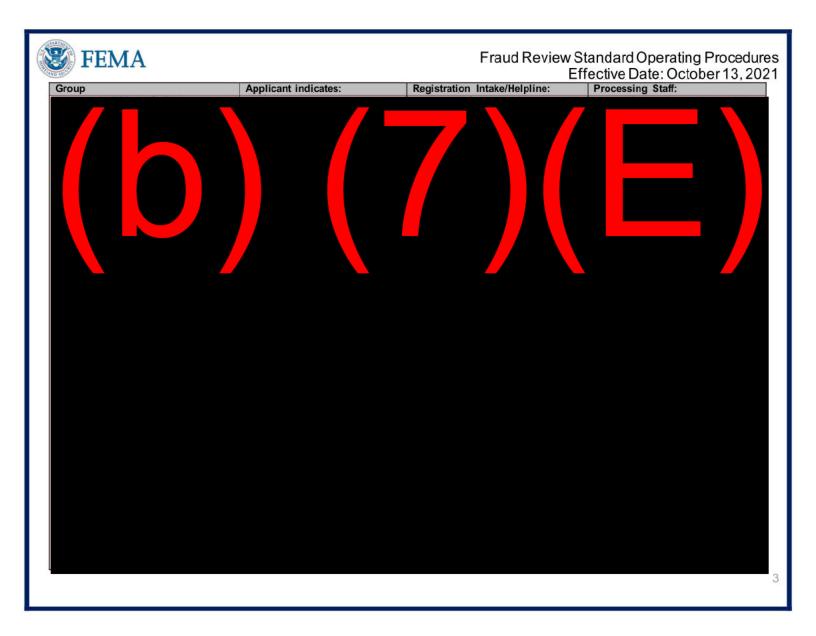


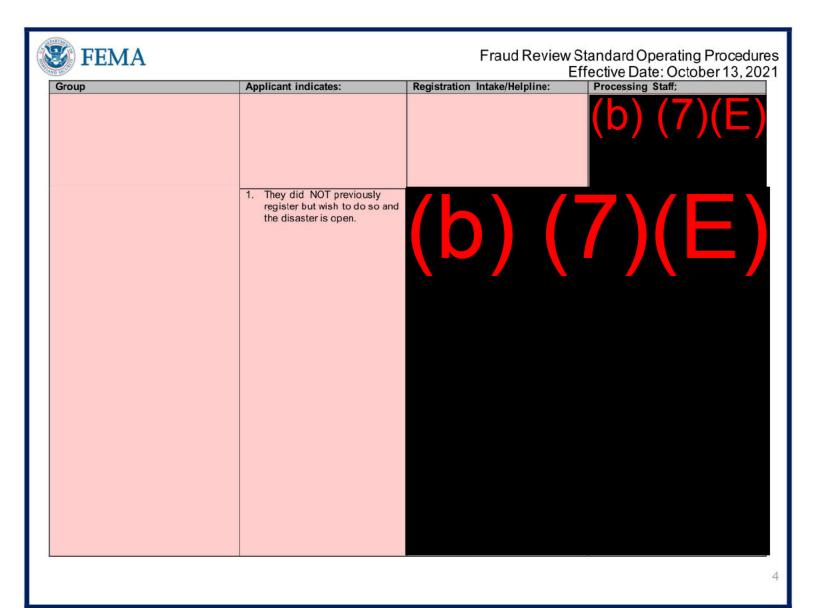
FRAUD REVIEW STANDARD OPERATING PROCEDURES

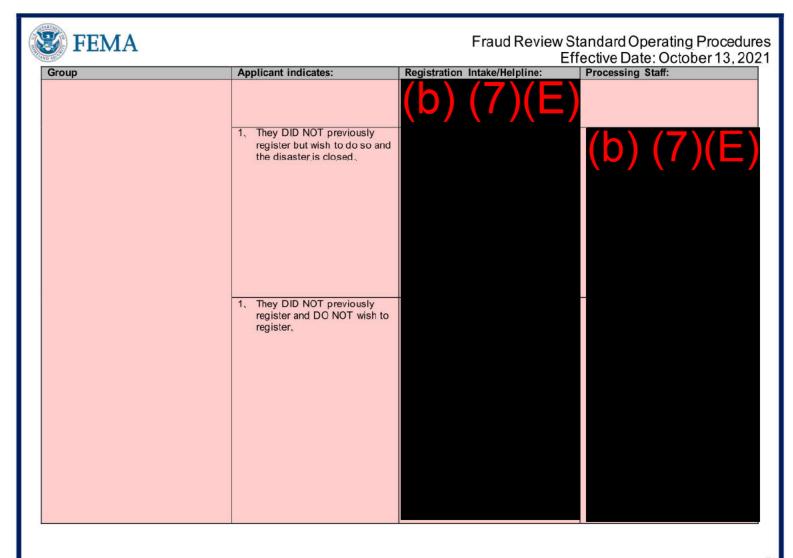
NOT E: Because of the Privacy Act, DO NOT release any Personally Identifiable Information (PII) or details directly related to the registration to anyone who has NOT completed the verification process. **REFER** to the <u>Helpline NPSC Caller Services Reference</u> Guide for additional information and details about PII.

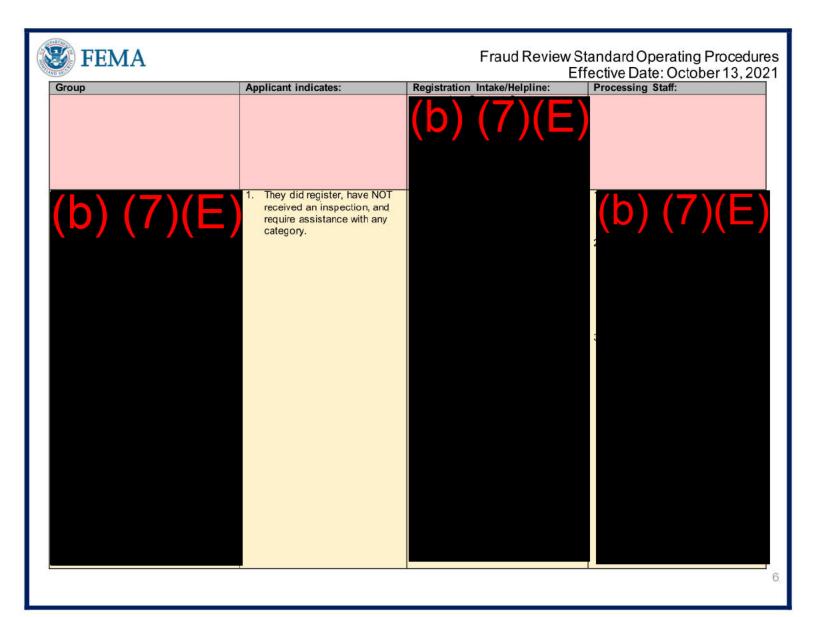


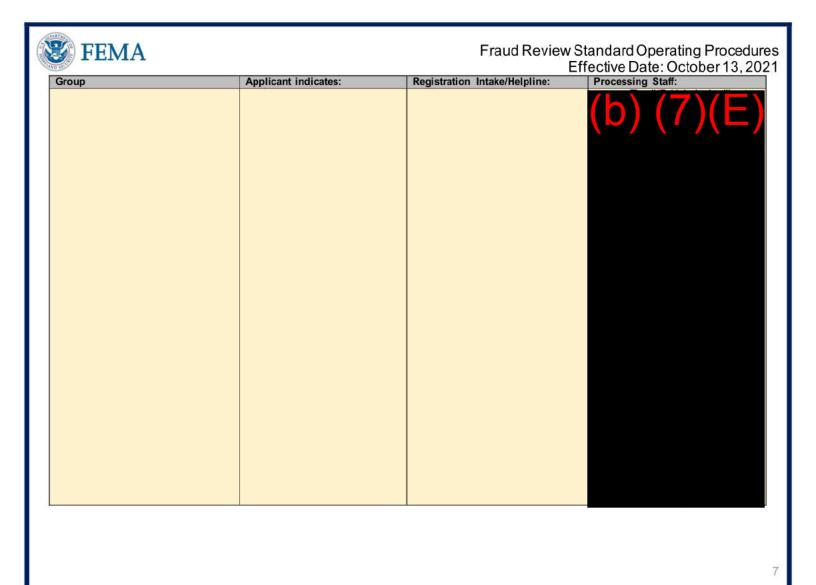


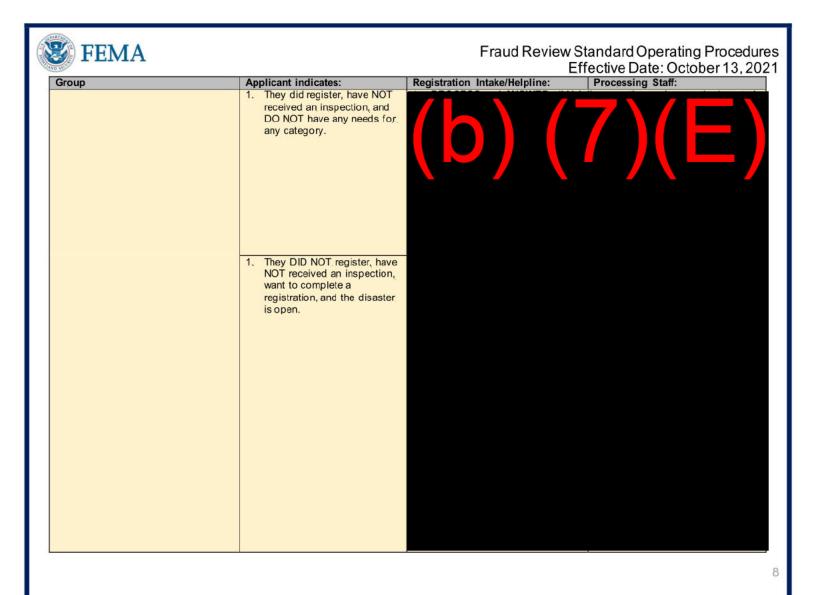


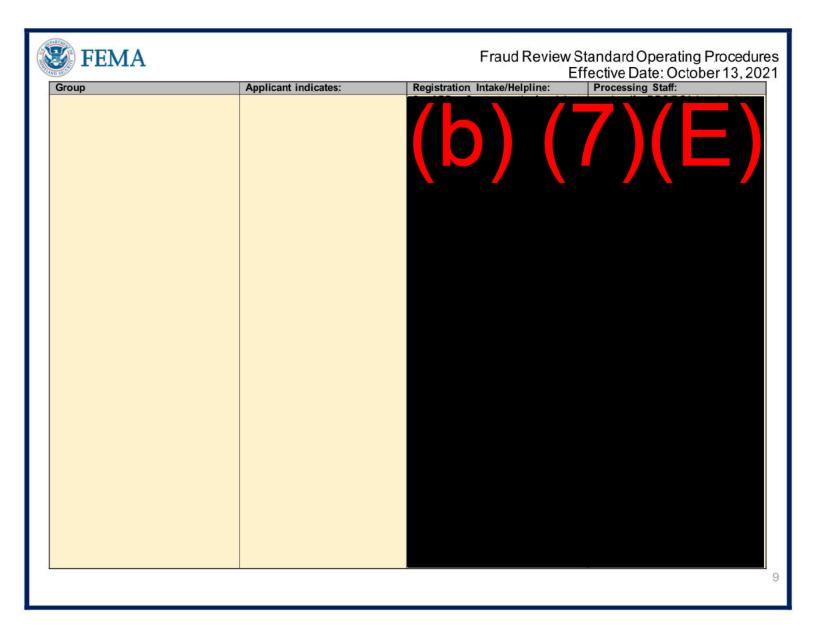


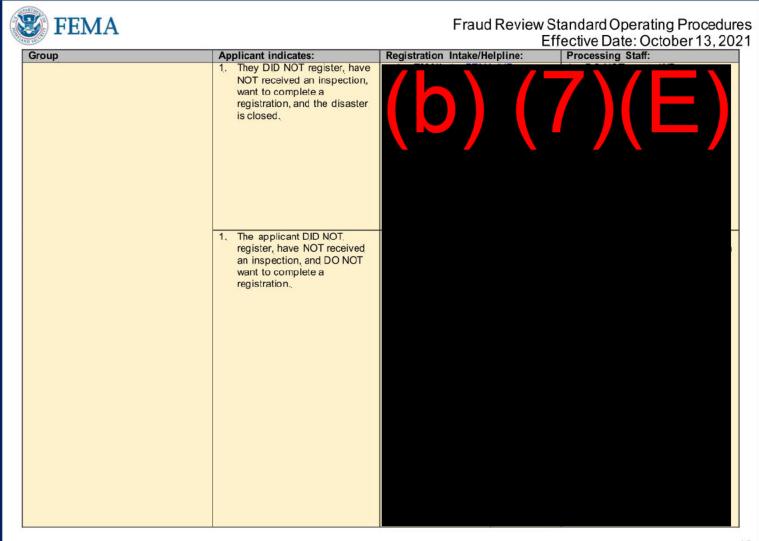


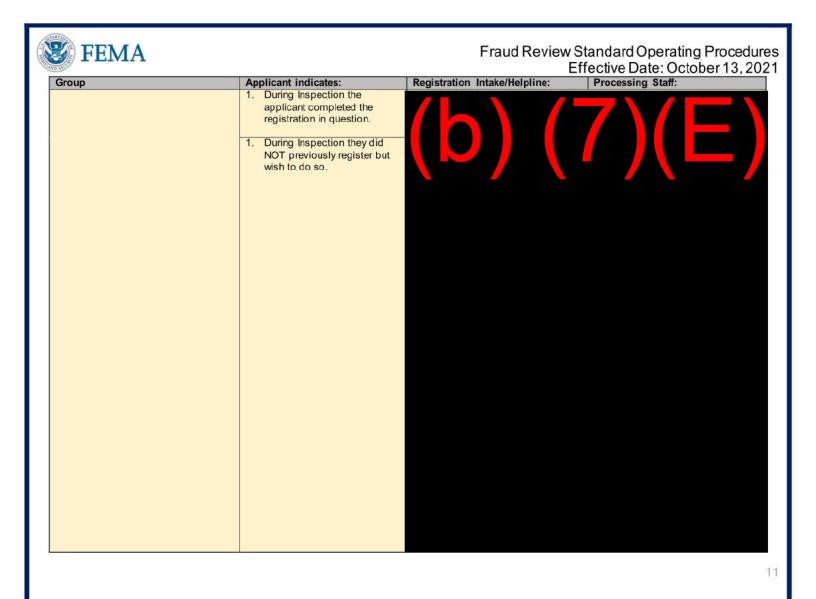


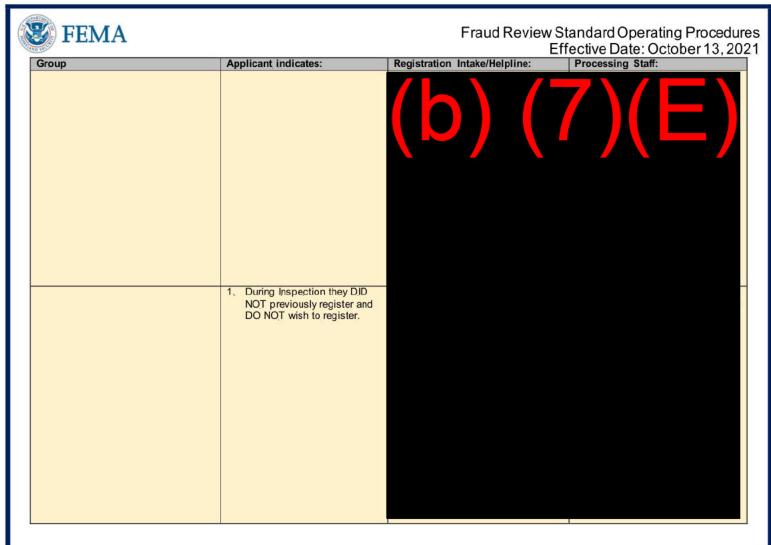












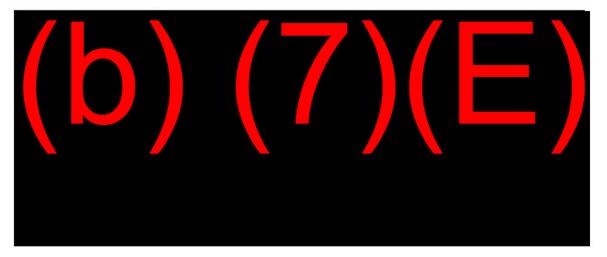


Group	Applicant indicates:	Registration Intake/Helpline:	Processing Staff;
		NOTE: If the registration is locked,	
		NO further action is required.	

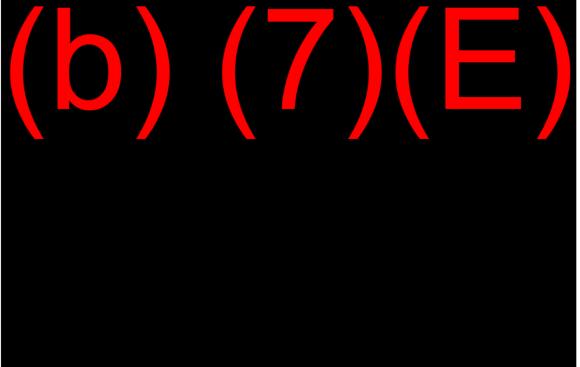
Other Items to Note:



■ DO NOT share the registration status codes or reasons with the caller.







(b) (7)(E)

o NO modification to the original EFT is allowed.



Fraud, Waste, and Abuse

- If the caller and/or staff has knowledge of fraud, waste, abuse, or allegations of misman agement involving disaster relief operations, report this information to FEMA or DHS:
 - o FEMA Fraud Branch:
 - Email: <u>StopFemaFraud@fema.dhs.gov</u>
 - Fax: (202) 212-4926
 - Write:

FEMA Fraud and Internal Investigation Division 400 C Street SW Mail Stop 3005 Washington, DC 20472-3005

- o DHS OIG:
 - Online through their <u>allegation form</u> (Recommended)
 - Call: (800) 323-8603
 - Fax: (202) 254-4297
 - Write:

DHS Office of Inspector General / MAIL STOP 0305 Attn: Office of Investigations – Hotline 245 Murray Lane SW Washington, DC 20528-0305



Fraud Review Standard Operating Procedures Effective Date: October 13, 2021

■ When making the report convey as much information (who, what, where, when, why, and how) as possible. You may request confidentiality or register your complaint(s) anonymously.





IDENTITY VERIFICATION

I. Overview	 Purpose Documentation or Verification Needed Other Items to Note ***This can be referenced by all staff (JFO, DRC, DSA, Helpline)*** 	2 3 3
II. Important Information	***ALL processing employees must read this section*** Prior to Processing Common Reasons for Identity Verification Fail Unacceptable Documents	5 5 6
III. Process	 A. Verifications Methods B. Acceptable Documentation C. Processing Procedures D. Joint Option Disaster Information (ONA Only) E. Appeals F. Exceptions 	7 9 11 11 12 14
IV. Examples and FAQs	 IDV_FAILED for Name Only IRS Documents Submitted for Identity Verification Identity Proofing Failed 	15 15 15
V. Definitions and Acronyms	■ Definitions ■ Acronyms	17 17
VI. Related Guidance	■ Links to Related Guidance	19



I. OVERVIEW

This section describes information that every employee <u>must</u> read **before addressing** Identity Verification.

Purpose:

- This Standard Operating Procedure (SOP) describes the Identity Verification (IDV) process and the steps to assist an applicant in correcting their identity failure (IDV_FAILED) status or Identity Proofing (IDP) failures (IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, or IDProof_Skip).
- Applicants who register with FEMA are required to meet IDV requirements (IDV_PASS) and IDP (IDProof_Pass_LN) in order to be processed for Individuals and Households Program (IHP) assistance.
- During the Registration Intake (RI) process:
 - Each applicant's name and Social Security Number (SSN) are verified for accuracy to ensure the SSN matches with the individual.
 The IDV checkpoints during RI occur:

NOTE: IDP failures (FAIL, ERROR, PEND, or SKIP) will be confirmed as Verified through acceptable documents or when an inspection is completed.

- In the Privacy Act screen; AND
- After entering the applicant's disaster-damaged address.
- Four questions will be presented to the applicant in order to satisfy an IDP verification. The IDP verification checkpoint during RI occurs:
 - After the Correspondence Preferences screen and prior to the Conclusion screen.
- **IDV** is a requirement for any type of IHP Assistance to be paid.
- Applicants who fail the **IDV** process (**IDV_FAILED**) will NOT be presented with the **IDP** questions.
- Once the **IDV** checks have been completed, the outcome of the verification is shown in the **Banner** as **IDV_PASS** or **IDV_FAILED**.

Documentation or Verification Needed:



Acceptable documents include, but are NOT limited to, the following (for details of what is required for each piece of documentation, refer to Section III.B: Acceptable Documentation):

- Documents from the Social Security Administration (SSA), Medicare, or other federal entities, NOT including Internal Revenue Service (IRS) forms or documents;
- Social Security Card, if accompanied by a current state, territorial, or tribal government (STT) or federal ID;
- Current Payroll Checkstub;
- United States Military ID;
- Documents showing proof of name change, e.g. a marriage/civil union/domestic partnership certificate or court ordered name change;
- United States Passport Booklet or Card; OR
- In Puerto Rico, the photo Voter's Registration Card (when the applicant fails for name only (SSN_NAME_FAIL).

Other Items to Note:

- For all disasters prior to and including DR-4606-LA, individuals with a NEMIS public records verification status of IDV_FAILED and/or OCCV_FAILED will NOT automatically receive an initial inspection. These individuals must submit an appeal letter with supporting documentation to verify their identity and/or occupancy prior to receiving an initial inspection.
- For DR-4607-MI and forward, applicants that failed identity and/or occupancy verification during registration will NOT be required to submit identity and/or occupancy documents prior to receiving an initial inspection.
 - If identity CANNOT be verified during the initial inspection, the applicant will need to submit the required documentation to FEMA. Refer to <u>Section III.B</u>: <u>Acceptable</u> <u>Documentation</u> for additional information.
- Individuals will NOT be able to create an online account to view their file if their status is IDV_FAILED, IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, or IDProof_Skip.
- IDP failure can only be addressed by the applicant through the submission of acceptable documents, when an inspection is NOT needed/required, or the inspection returns as INCI, IMI, or Withdrawn (WVO or WVOA). Refer to Section III.B: Acceptable Documentation.



- IDV is a different requirement than Citizenship Verification. Individuals who are NOT U.S. Citizens, but are either Non-Citizen Nationals or Qualified Aliens are able to obtain an SSN to legally work in the United States. Refer to the Helpline NPSC Caller Services Reference Guide for additional information.
 - An applicant who is NOT a U.S. Citizen, Non-Citizen National, or a Qualified Alien could be IDV_PASS but will NOT be eligible for IHP Assistance.
- When processing any of the following categories for applicants that have NOT or will NOT have an inspection, the applicant must submit acceptable IDV documents prior to receiving assistance. If an IIDV- Ineligible Failed IDV decision has been made, a signed appeal letter will be required. Refer to Section III.B: Acceptable Documentation.
 - Medical Assistance;
 - Dental Assistance;
 - Transportation Assistance;
 - Miscellaneous Other Items:
 - Funeral Assistance; OR
 - Child Care Assistance.

Helpline Staff: Refer to Identity and Citizenship Verification in the <u>Helpline NPSC Caller Services</u> Reference Guide for additional information.



II. IMPORTANT INFORMATION

This section describes information that every employee <u>must</u> read *before processing* Identity Verification.



Prior to Processing:

- Prior to reviewing or discussing Other Needs Assistance (ONA), VERIFY the ONA Option selection.
 - FEMA staff are authorized to process and discuss ONA in FEMA Option disasters.
 - In Joint Option disasters, only the STT is authorized to process and discuss ONA eligibility. Refer to <u>Section III.D: Joint Option Disaster Information</u>.
 - Helpline Staff: Refer to the <u>Helpline NPSC Caller Services Reference Guide</u> for additional information.
 - For ONA questions in Joint Option disasters, PROVIDE the applicant the STT ONA Helpline number which is listed on the Disaster Info (F8) link.

Common Reasons for Identity or Identity Proofing Verification Failure:

- An IDV_FAILED can be caused by any of the following conditions:
 - The applicant's name is misspelled, or contains hyphens or punctuations; e.g. Jones-Brown or O'Malley;
 - The married name was used while completing a registration, but the name change has NOT yet been recorded by the SSA, or the change to the maiden name was recently made;
 - The middle initial is missing;
 - The applicant uses another name for doing business; OR



- The SSN was entered incorrectly.
- An **IDP** failure can be caused by:
 - A lack of or limited data to generate four IDP questions; OR

NOTE: Occasionally technical or system issues will result in IDV_FAILED. In this situation staff will need to follow procedures listed in this SOP.

- Incorrect responses to IDP questions at the time of registration and/or additional failed attempts at creating an online account.
- USE the standard Ineligible Failed Identity Verification (IIDV) decision code when the applicant:
 - Is NOT able to authenticate name and SSN for identity (IDV_FAILED) at the time of registration; OR
 - DOES NOT require an inspection, e.g. requests for Child Care Assistance only; the applicant is IDP failed, e.g. IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, or IDProof_Skip; and the applicant did NOT submit acceptable IDV documents. Refer to Section III.B: Acceptable Documentation.
- IDV_PASS and IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, or IDProof_Skip:
 - If a case stops for manual processing post-inspection with a return reason such as INCI, IMI, or WVO/WVOA, SELECT the eligibility determination that best applies to the inspection results such as INCI.
 - IDP failures will be addressed once the applicant requests a reinstatement.
 For information on reinstatement requests for previous INCI, IMI, or
 WVO/WVOA determinations, refer to the <u>Inspection Requests and</u>
 Comparisons SOP for additional information.
 - NOTE: When IDP failures occur, categories that can be traditionally processed without an inspection CANNOT be addressed until identity documents are received. Refer to Section III.B: Acceptable Documentation.

Unacceptable Documents:

- IRS forms or income tax documentation;
- Notarized statements or affidavits from applicants or any third parties; OR
- Applications for marriage license or assistance from a Federal entity; e.g. Medicare.



III. Process

A. Verification Methods

- If an applicant CANNOT pass the **IDV** check during the registration process, an automated **IIDV** decision will be added to the file and the corresponding notification letter will be sent. Applicants will be required to submit an appeal letter with supporting documents for review.
 - a. For all disaster prior to and including DR-4606-LA, an initial inspection should NOT be requested if the **Banner** shows **IDV_FAILED**.
 - b. For all disasters, assistance should NOT be awarded if the **Banner** shows **IDV_FAILED**.
- Always CHECK the Registration Status screen for IDP failure codes IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, or IDProof_Skip if an inspection has NOT occurred or returned with an INCI, IMI, or WVO/WVOA reason.
 - a. **REVIEW** incoming mail, the **Info Control** screen, and/or **Comments** made on acceptable documents received.
 - b. When **IDP** failures occur, categories that can be traditionally processed without an inspection CANNOT be addressed until identity documents are received. Refer to Section III.B: Acceptable Documentation.
- 3. IDProof_Fail_LN, IDProof_Error_LN, IDProof_Pend, IDProof_Skip, and IDProof_Pass_LN identifiers are only available in the Registration Status screen.

ID Proofing Status Codes

IDProof_Fail_LN: Recorded when someone answers 3 or the 4 questions incorrectly, the second time.

IDProof_Error_LN: Recorded if a lack of or limited data exists to generate four IDP questions.

IDProof_Pend: Recorded when the system timed out or the browser was closed before answering the **IDP** questions.

IDProof_Skip: Recorded only during Call Center Registrations when the applicant elects NOT to answer the **IDP** questions.

IDProof_Pass_LN: Recorded when all questions are answered correctly.

Table 1: Identity Proofing Status Codes

- 4. The dates and results of the IDV status that impacts eligibility appears in the **Registration Status** screen or the **Banner**.
 - a. The IDV status indicated in the Banner may differ from the Registration Status screen if the applicant has provided information related to IDV and the verification was set on the Info Control screen.



- Changes to the file should NOT be attempted unless an appeal letter with acceptable documents are in the file to support a correction to the applicant's name or SSN.
- 6. The **Registration Status** screen will contain the specific fields of the verifications, whether pass or fail. A **FAILED** in any of the following fields will produce an overall **IDV_FAILED** status in the **Banner**.

IDV Status Codes

SSN_Death: The SSN recorded in NEMIS was reported to the SSA as belonging to a deceased individual.

SSN Multiple: The SSN recorded in NEMIS is being used by more than one individual.

SSN_Name: The name and the SSN as recorded in NEMIS DO NOT match.

SSN_Valid: The SSN recorded in NEMIS is NOT a valid number within the SSA. This is common with applicants who provide work visas, student visas, or IRS Tax ID numbers.

Table 2: IDV Status Codes

- 7. Every time a change is made to the applicant or co-applicant's name, SSN, and/or the date of birth, the saved changes are then verified through a verification process called Java Auto-Determination Engine (**JADE**).
- 8. During the registration process, each applicant's name and SSN are sent to a FEMA contractor for **IDV**.

Setting Verifications

- 1. When an applicant submits an appeal letter with approved documentation supporting **IDV** or **IDP** verification, staff will access the **Info Control** screen:
 - a. ADD the Identity Verification requirement;
 - ASSOCIATE the Identity Verification requirement to the applicable substantiation received;
 - SET the Identity Verification requirement to Verified;
 - d. ADDRESS/PROCESS any outstanding issues or categories of assistance;
 - For all disasters prior to and including DR-4606-LA, if occupancy is verified, REQUEST an initial inspection, if necessary;
 - e. ADD a Comment; AND
 - i. Summary Line: FACILITY# (NPSC#) IDV_PASS AND/OR IDP_PASS = (WHAT WAS CHANGED)
 - ii. **Body:** Changed (item) from (previous) to (corrected)





- 1. Provide detail about verbal statement or document used as proof.
- 2. IDV and/or IDP changed from FAILED to PASS.
- 3. **RECORD** case processing information and routing location, if applicable.
- f. ROUTE the Workpacket (WP) to Send for Inspection, FEMA Approval NON-DRM or FEMA Ineligible, as appropriate.

NOTE: The verification requirement is attached to all categories of assistance. Therefore, if any HA or ONA Pending (PND) lines are deleted, the Identity Verification requirement will automatically be reset back to Pending Request. The Banner will also change from IDV_PASS to IDV_FAILED.

- 2. In certain instances, external databases; e.g. NEMIS public records verification, may be used by staff to confirm identity. When this occurs staff will:
 - a. ADD the appropriate substantiation under the Communication screen;
 - ASSOCIATE the Identity Verification requirement to the applicable substantiation received; AND
 - c. **SET** the **Identity Verification** requirement to **Verified**.

NOTE: It is possible that the **Registration Status** screen will still reflect **IDV_FAILED** after a name change; however, if the applicant has an appeal letter with acceptable documents, the verification requirement can be updated and the case can be processed.

B. Acceptable Documentation

Only certain documents will be considered acceptable for overturning an **IIDV** status due to **IDV_FAILED** and/or **IDP** failure. Submitted documents will be reviewed for possible correction of name or SSN. Acceptable documents include, but are NOT limited to the following:

1. Documents from the SSA, or other Federal entity, containing full or last four digits of SSN:



- a. Medicare/Medicaid cards are acceptable as long as they are NOT expired. The card must include the full or last four digits of the SSN, and it may include a letter code such as A at the end;
- b. This DOES NOT include income tax documentation or IRS forms.
- c. Copies of Numident reports issued prior to 2015 are viewed as acceptable documents from the SSA.
- 2. Social Security card:
 - Social Security card is acceptable if accompanied by Federal or state-issued identification (current, with or without any portion of the SSN).
- 3. Employer's payroll document or check stub:
 - a. The document must be current; AND
 - b. Contain the full or last four digits of the SSN.
- 4. Military identification (ID):
 - a. Acceptable with or without any portion of the SSN.
- 5. Documents showing proof of name change, acceptable with or without any portion of the SSN:
 - a. Name change court order;
 - b. Marriage, civil union, or domestic partnership certificate;
 - c. Divorce or annulment decree;
 - d. Certificate of citizenship or naturalization;
 - e. United States (U.S.) Tribal government document;
 - f. U.S. amended/corrected birth certificate: AND
 - g. If the applicant still fails **IDV** using their previous name, the applicant will be required to submit one of the other forms of acceptable **IDV** documents.

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- 6. United States passport booklet or card:
 - a. Acceptable with or without any portion of the SSN.
- 7. On a case-by-case basis, FEMA may allow applicants residing in U.S. territories to submit specific **IDV** documents, e.g. Voter Registration Cards, etc.
 - a. All US territories; e.g. Guam, American Samoa, Puerto Rico, the Northern Mariana Islands, and the U.S. Virgin Islands, may have Disaster Specific Operating Procedures to address IDV requirements specific for that region.
 - b. In Puerto Rico, the photo Voter's Registration card may be used to verify identity when the applicants fails for **NAME ONLY**.

C. Processing Procedures:

- 1. If there is NOT a previous **IIDV** decision and the documents available in the file fully prove identity:
 - a. ASSOCIATE the Identity Verification requirement with the document in the Info Control screen;
 - b. For all disasters prior to and including DR-4606-LA, if occupancy is verified, **REQUEST** an initial inspection, if necessary; AND
 - If an inspection is NOT required, ADDRESS/PROCESS any outstanding issues or categories of assistance.
 - d. ENTER a Comment; AND
 - e. ROUTE the Workpacket (WP) to Send for Inspection, FEMA Approval NON-DRM, or FEMA Ineligible, as appropriate.

D. Joint Option Disaster Information (ONA Only)

- 1. If processing a Joint Option Disaster:
 - a. ONA categories are only processed by the STT.
 - b. FEMA staff is authorized to process Housing Assistance (HA) categories.
- 2. If incoming mail generates a WP to a FEMA processing queue:



- a. REVIEW/PROCESS any outstanding issues within HA categories.
 - If an additional WP is available in an STT processing queue or subqueue; such as State Manual Determination, State Appeal, or State Supervisor Review; NO further action for ONA is required.
 - ii. If an additional WP is NOT available in an STT processing queue; AND
 - 1. There are NO HA categories to address:
 - a. ROUTE the existing WP to the State Manual Determination gueue.
 - 2. There are HA categories to address:
 - a. On the **Confirmation** screen, **SELECT** the appropriate **Routing** location for all HA categories;
 - b. SELECT State Manual Determination for all ONA categories; AND
 - c. CLICK Submit

E. Appeals

- 1. If applicant sent an appeal letter with documents showing proof of name change in an attempt to address the **IDV_FAILED**, with or without any portion of the SSN:
 - a. CHANGE the name in the Registrant Info screen to the name on the marriage license/certificate;
 - b. **SAVE** the changed information and allow the verification process to run;
 - i. If working in a processing queue, **PLACE** the case on **Hold Current User**.
 - c. **WAIT** two-five minutes to allow **JADE** to run the verification checks and **RETURN** to the case;
 - d. Once JADE has completed its check, REVIEW the Registration Status screen to determine if the status is IDV_FAILED or IDV_PASS;
 - e. For all disasters prior to and including DR-4606-LA:
 - If the status is IDV_PASS, REQUEST an initial inspection and ROUTE the WP to Send for Inspection.



- If an inspection is NOT required, ADDRESS/PROCESS any outstanding issues or categories of assistance and ROUTE the WP to FEMA Approval NON-DRM or FEMA Ineligible, as appropriate.
- ii. If the status is IDV_FAILED:
 - SET the Identity Verification requirement as Verified on the Info Control screen;
 - 2. **REQUEST** an initial inspection;
 - 3. ADD a Comment; AND
 - 4. **ROUTE** the WP to **Send for Inspection**.
 - If an inspection is NOT required, ADDRESS/PROCESS any outstanding issues or categories of assistance and ROUTE the WP to FEMA Approval NON-DRM or FEMA Ineligible, as appropriate.
- f. For DR-4607-MI and forward:
 - If the status is IDV_PASS, ADDRESS/PROCESS any outstanding issues or categories of assistance and ROUTE the WP to FEMA Approval NON-DRM or FEMA Ineligible, as appropriate.
 - ii. If the status is IDV_FAILED;
 - SET the Identity Verification requirement as Verified on the Info Control screen; AND
 - ADDRESS/PROCESS any outstanding issues or categories of assistance and ROUTE the WP to FEMA Approval NON-DRM or FEMA Ineligible, as appropriate.
- 2. If the applicant is a minor child with an undocumented parent or legal guardian as the co-registrant:
 - a. The review procedure for these cases is the same as for an adult, except that the documents need to have the child's name and SSN instead of the parent's or legal guardian's. An appeal letter also must be submitted.
 - i. **ACCEPT** all documents type listed in <u>Section III.B. Acceptable</u> <u>Documentation</u>.

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- b. In addition to acceptable documents in <u>Section III.B. Acceptable Documentation</u>, the submission of the child's social security card with a U.S. birth certificate is acceptable verification for minor children with an **IDV FAILED**.
 - i. If received, **SET** the verification appropriately on the **Info Control** screen.
- c. For all disasters prior to and including DR-4606-LA, if occupancy is verified, **REQUEST** an initial inspection; OR
- d. For DR-4607-MI and forward, **ADDRESS/PROCESS** any outstanding issues or categories of assistance.
- e. ROUTE the Workpacket (WP) to Send for Inspection, FEMA Approval NON-DRM, or FEMA Ineligible, as appropriate.
- 3. If the case remains IDV FAILED:
 - a. The applicant will remain ineligible. PROCESS as Appeal Ineligible Failed Identity Verification (A-IIDV); AND
 - b. ROUTE the WP to FEMA Ineligible.
 - i. If unable to route directly to FEMA Ineligible, ROUTE the case to FEMA Manual Determination, then ROUTE to FEMA Ineligible; e.g. from FEMA Manual Determination Citizenship Verification queue, ROUTE the case to FEMA Manual Determination Ineligibility Review, then, PROCESS the case with the Ineligible decision.

F. Exceptions

There may be unique scenarios NOT specifically identified within this SOP that may require additional assistance.

- 1. If unable to determine eligibility using available SOPs, Disaster Specific Operating Procedures or other posted information:
 - a. **CALL** the IHP Helpdesk (b) (6) or the applicable extension number) or **EMAIL** to the appropriate Supervisor or Point of Contact (POC).
 - If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - EMAIL a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov).



IV. EXAMPLES AND FAQS

Scenario 1: IDV_FAILED for Name Only:

The applicant, Terry Ritter; applied and received a NEMIS public records status of IDV_FAILED and was provided an ineligible IIDV decision. A review of the Registration Status screen indicates he failed due to name only

 (SSN_NAME_FAIL). He submits an appeal letter with a copy of his Social Security Card and current driver's license, both in the name of Terrance Joel Ritter.

Result: These documents are acceptable for proof of identity. ENTER the applicant's full name in the Registrant Info screen following the procedure stated in Section E: Appeals above.

Scenario 2: IRS Documents Submitted for Identity Verification:

 The applicant, Terry Ritter; applied and received a NEMIS public records status of IDV_FAILED and was provided an ineligible IIDV decision. A review of the Registration Status screen indicates he failed due to name only (SSN_NAME_FAIL). He submits an appeal letter with a copy of his 2014 IRS Form 1099 as proof of identity.

Result: IRS documents are NOT acceptable for proof of identity. GENERATE an Appeal Request Document (ADOC) letter with the Failed Identity Verification insert. If an ADOC has previously been requested for the same item, PROCESS as in eligible using the A-IIDV decision code.

Scenario 3: Identity Proofing Failed

 The applicant, Terry Ritter; applied for Medical Assistance only and is determined IDProof_Fail_LN because he was unable to correctly answer the IDP questions at RI. He submits an appeal letter with a copy of his payroll check stub with the last four digits of his SSN included.

Result: The document is acceptable for proof of identity. FOLLOW the procedures stated in <u>Section A: Setting</u>
<u>Verifications</u> above to SET the Identity Verification requirement to Verified on the Info Control screen and PROCESS any outstanding issues or categories of assistance.







V. DEFINITIONS AND ACRONYMS

Definitions

Identity Verified: Applicant will be **IDV_PASS** if their name, date of birth, and SSN match with the information recorded by the SSA or if the applicant submits acceptable documents to verify their identity.

Identity Proofing Verified: Applicant will be **IDProof_Pass** if they submit acceptable documents to verify their identity.

Numident Report: Is a query display of the information taken from an individual's application for an original SSN card and subsequent applications for replacement SSN cards. A full record of all changes to the information (such as change of name) is also maintained. The document will provide the information of the person attached to the specific SSN.

Signature: A valid signature may be evidenced by any mark made by pen or pencil denoting the signer's name or mark; a mark or name created and adopted through a software program such as Microsoft Word; adoption of an electronic signature that includes typing a name or mark at the end of an email; a digital image of a handwritten signature or mark; the click of an "I accept" button on an e-commerce site as his or her legal signature; or adoption of an electronic symbol, sound, or process that is attached to, or logically associated with, the document and executed by the applicant or his or her agent, with the intent to sign the document.

Acronyms

A-IIDV Appeal Ineligible Failed Identity Verification

DR Disaster

DRC Disaster Recovery Center

DSA Disaster Survivor Assistance

DSOP Disaster Specific Operating Procedure

HA Housing Assistance

IDProof Identity Proofing

IDV Identity Verification



IHP Individuals and Households Program

IIDV Ineligible Failed Identity Verification

IRS Internal Revenue Service

JADE Java Auto-Determination Engine

JFO Joint Field Office

NEMIS National Emergency Management Information System

ONA Other Needs Assistance

RI Registration Intake

SOP Standard Operating Procedures

SSA Social Security Administration

SSN Social Security Number

State, territorial or tribal government

WP Workpacket



VI. RELATED GUIDANCE

Please refer to the following:

- Standard Operating Procedures
 - o Appeal Processing
 - o Codes, Verifications, Request Letters, and Assistance Types
 - o Inspection Requests and Comparisons
- Resources
 - o Helpline NPSC Caller Services Reference Guide





INSPECTION REQUESTS AND COMPARISONS

l,	Overview	■ Purpose Other Items to Note ***This can be referenced by all staff (JFO, DRC, DSA, Helpline)***	2 2		
H.	Important Information	***ALL processing employees must read this section***			
Ш.	Process	 Prior to Processing A. Eligibility Verifications B. Information Requests C. Processing Eligible Assistance D. Processing Ineligible Decisions E. Joint Option Disaster Information (ONA Only) F. Appeals G. Exceptions 	4 6 7 7 26 28 28 28		
IV.	. Examples and FAQs	 Initial Inspection Appeal Inspection FEMA Correction Inspection Scenario 1: FVL Increased - No Previous Award Scenario 2: FVL Increased - Previous Award Same Category Scenario 3: FVL Increased - Insured Applicant with Previous Award Same Category Scenario 4: FVL Remained Same Scenario 5: FVL Decreased - Previous Award Same Category Scenario 6: FVL Increased - FEMA Review with 	30 32 32 34 35 36 37 38		
		 Duplicated Line Items Scenario 7: FVL Increased - FEMA Review with Non-Duplicated Line Items Scenario 8: FVL Increased - COD Changed Scenario 9: FVL Decreased - Multiple CODs Recorded in Both Inspections Scenario 10: FVL Decreased - New COD Recorded in Second Inspection 	41 43 44 46		
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I. OVERVIEW

This section describes information that every employee <u>must</u> read *before addressing* Inspection Requests and Comparisons.

Purpose:

■ This document addresses procedures related to performing inspection requests and inspection result comparisons.

NOTE: Verification of damage caused by the disaster can be confirmed by an onsite, geospatial, or other approved alternative inspection method approved for the disaster.

Other Items to Note:

- For all disasters prior to and including DR-4606-LA, ownership and occupancy will be verified with NEMIS public records. If the NEMIS public records verification is NOT available, the applicant will need to submit the applicable documents directly to FEMA prior to receiving an initial inspection.
- For DR-4607-MI and forward, applicants that failed identity, occupancy, and/or ownership verification post-registration will NOT be required to submit identity, occupancy, and/or ownership documents prior to receiving an initial inspection.
- For DR-4609-TN and forward, applicants that self-report at Registration Intake (RI) that they have minimal damages but can remain in their home will be automatically issued for inspection as long as they meet all other criteria for receiving an inspection.
 - If the inspector CANNOT verify identity, occupancy, and/or ownership during the initial inspection, the applicant must still submit the applicable documentation directly to FEMA.
 - The applicant, co-applicant, or an authorized third party (18 years or older) must be present for an inspection. Refer to the <u>Third Party</u> Inspections section for additional information.
- Information recorded by the inspectors is the basis for most of the assistance approved for applicants. Inspections are used to verify losses or damage caused by the disaster and assist individuals that may be uninsured or underinsured for expenses and serious needs.
- Applicants who live in a Coastal Barrier Resource System (CBRS), a Sanctioned Community (SC), or are Non-Compliant (NCOMP) with the National Flood Insurance Requirement Act (NFIRA) can still have an initial inspection regardless of the Cause of Damage (COD). Most are auto-generated, but if the need for a manual inspection



request arises, **CONTINUE** with normal processing when requesting an initial inspection.

- For processing information regarding CBRS, SC, and **NCOMP**, refer to the <u>Flood</u> <u>Zones and Other Protected Areas</u> SOP.
- When requesting an inspection, **USE** a pending (**PND**) line if the damage type is uninsured; or, **USE** an insurance pending (**IPND**) line if the damage type is insured.
- The IA Training and Development section has developed a guide that includes stepby-step instructions and reminders about navigating and using the tools in Web NEMIS. For additional information, refer to the <u>Web NEMIS Initial Assistance</u> Reference Guide.



I. IMPORTANT INFORMATION

This section describes information that every employee <u>must</u> read *before processing* Inspection Requests and Comparisons.



Prior to Processing:

- Prior to reviewing or discussing Other Needs Assistance (ONA), VERIFY the ONA Option selection.
 - Staff is authorized to process and discuss ONA in FEMA Option disasters.
 - In Joint Option disasters, only the state, territorial or tribal government (STT) is authorized to process and discuss ONA eligibility. Refer to <u>Section III.E: Joint</u> Option Disaster Information.
 - Helpline Staff: Refer to the <u>Helpline NPSC Caller Services Reference Guide</u> for additional information.
- For ONA questions in **Joint Option** disasters, **PROVIDE** the applicant the STT ONA Helpline number, which is listed on the NEMIS **Disaster Info (F8)** link.
- Sequence of Delivery
 - Housing Assistance (HA)
 - Temporary Housing Assistance, if eligible; AND
 - Home Repair Assistance or Home Replacement Assistance.
 - ONA
 - Funeral Assistance, if there is a pending funeral review;
 - SPLIT/ROUTE the Funeral PND line to the FEMA or State Funeral queue for processing by designated staff. Refer to the <u>Funeral Assistance</u> SOP for additional information.



- When moving to the next eligible award in the sequence, if necessary,
 ADJUST the eligible award by one full funeral maximum amount to ensure funds are available for funeral expenses.
 - DO NOT hold/deduct funds when processing Americans with Disabilities Act (ADA) item awards.
 - DO NOT delay processing other eligible funds to await a funeral decision.
- Personal Property Assistance (PP); AND
- All other categories, if funds are available under their respective maximum amount of assistance.
- ADA assistance reviews are only assigned to a limited group of Specialized Processing Unit (SPU) staff.
 - DO NOT process ADA RP items unless specifically assigned.
 - If a WP with RP ADA line items is identified outside of the FEMA Special Handling queue:
 - ADD a Comment; AND
 - ROUTE to the FEMA Supervisor Review ADA Process subqueue.



III. PROCESS

A. Eligibility Verifications

Applicants must meet the eligibility criteria for each type of assistance in order to receive that assistance.

- 1. Verifications Completed by Inspector
 - a. The inspector will:
 - i. Verify the applicant's name, address, contact information, proof of ownership, occupancy status, and insurance;
 - 1. For all disasters prior to and including DR-4606-LA, occupancy and ownership will NOT be verified by the inspector.
 - DR-4607-MI and forward, applicants that failed identity, occupancy, and/or ownership verification during registration can provide proof of identity and/or occupancy to the inspector.
 - a. If occupancy and/or ownership CANNOT be verified during the initial inspection, the applicant will generally need to submit the required documentation to FEMA.
 - i. Document the pre-disaster residence's square footage, foundation, and structural type, e.g. one or multiple stories;
 - Record the COD, applicable water levels, impacted utilities, and accessibility features;
 - iii. Confirm individuals living in the pre-disaster residence and bedrooms occupied;
 - iv. Assess the pre-disaster residence's structure, furniture, and appliances for damages caused by the disaster, as well as undamaged items; AND
 - v. Assess any associated medical, dental, transportation, or miscellaneous item expenses.
 - To include Americans with Disabilities Act (ADA) real property (RP) items due to a disaster-cause injury/illness.
- 2. Manual Eligibility Verifications



- a. If an eligibility determination did NOT auto process, FOLLOW the standard eligibility verifications for each category of assistance.
 - i. Refer to the applicable <u>Processing Procedures Manual (PPM)</u> Standard Operating Procedures (SOPs) for additional information.

B. Information Requests

In addition to the verification requirements listed under <u>Section A: Eligibility Verifications</u>, the applicant is required to submit documents indicating the expense was caused by the disaster and the amount of expenses.

- Some situations can be resolved by performing a <u>courtesy call</u> to a contractor (three call attempts required). Refer to the <u>Outbound Calls and Third Party</u> Verifications SOP for additional information.
 - a. If the call attempt is successful:
 - i. **OBTAIN** required information from the contractor; AND
 - RECORD the response(s) in NEMIS and CONTINUE processing.
- b. If the call attempt is unsuccessful:
 - COMPLETE a review of all other verification requirements and documents received;
 - ii. CALL the applicant, PROVIDE details of information required from a contractor, RESOLVE any outstanding questions; AND
 - iii. PROCESS a determination by category and REVIEW options for request letters such as Appeal Request Documentation (ADOC) if a previous initial determination has been processed. Refer to the Codes, Verifications, Request Letters, and Assistance Types SOP for additional information.

C. Processing Eligible Assistance

When issuing an inspection, it is critical to know when to request an inspection, the type of inspection to request, and how to request an inspection.

1. When to Request an Inspection



- a. Inspections for the following categories of assistance are warranted:
 - i. **HA**;
 - ii. PP; AND
 - iii. Transportation only when combined with other **HA** or **ONA** categories; DO NOT request an inspection for Transportation only registrations.
 - iv. ADA RP items due to a disaster-cause injury/illness.
- b. Inspections for the following categories of assistance should NOT be requested, unless directed otherwise by Disaster Specific Operating Procedures (DSOP).
 - i. Medical:
 - ii. Dental;
 - iii. Funeral; AND
 - iv. Miscellaneous.
- 2. Types of Inspections
 - a. Contractor Requested Correction Inspection (CCOR)
 - A type of inspection that is requested when the report contains ambiguous or conflicting information, errors, and/or when the inspection was NOT performed.
 - ii. This type is initiated only by the contractor.
 - iii. DO NOT use this inspection request.
 - b. FEMA Appeal Inspection
 - i. Type of inspection request when:
 - The applicant submits documentation that meets the appeal request requirements;
 - 2. The request is for damage(s) NOT addressed in a previous inspection;
 - a. Example: An applicant claims damage caused by the disaster (with or without a contractor estimate, bill, or receipt) to utilities, real property (**RP**), **PP**, or rooms that are NOT listed in previous inspection reports



and are NOT identified as **Not Affected** in previous inspection **Comments**.

- The request is for an increase in the level of damage for an item(s)
 recorded in a previous inspection. This type must be accompanied by an
 estimate, bill, or receipt;
 - a. Example: The contractor or technician assessment/statement confirms additional damage caused by the disaster to RP / PP items identified in a previous inspection report as Repair, Replace, or Not Affected.
- 4. The request is for ADA RP items due to a disaster-caused injury/illness. This type must be accompanied by a medical provider letter, itemized bill/estimate/receipt, and the ADA RP items not covered by insurance. The purpose of the inspection will be to ensure the required real property items can be added to the home and are necessary for accessibility. E.g. A long ramp is not needed for a ground level entrance to a home.
 - a. inspection request for ADA/RP items due to a disaster-caused injury/illness an EMAIL must be sent to the <u>Housing Inspection</u> <u>Services - Task Monitors</u> (HIS). Refer to the Home Repair Assistance SOP for additional processing information.

NOTE: DO NOT request a second appeal inspection (third overall inspection) unless there is new evidence on file indicating damage(s) was NOT addressed in any of the previous inspections. **INCLUDE/DESCRIBE** the unaddressed items requiring review in the **Inspection Request Comment**.

Signed estimates, bills, receipts, ledgers, contracts, etc. are NOT acceptable in place of an appeal letter.

- 5. In **FEMA Option** disasters, **ONA** appeals will follow the above procedures for the categories of; AND
 - a. **PP**; AND
 - b. Transportation, only when combined with other **HA** or ONA categories;
 - Appeal inspections should NOT be requested for a **Transportation** Only registration.
- 6. Not Caused by the Disaster (NCD).



- a. When an Inspection Report contains a Comment that states NCD, even if the NCD item is NOT specifically identified, a verified estimate/receipt is required in the file before an appeal inspection may be requested.
- b. There may be unique circumstances in which a detailed explanation of damage caused by the disaster, NOT listed in the first inspection report or listed as NOT caused by the disaster, would warrant a second inspection.
- c. If an applicant submits an estimate/receipt for items listed as NCD, staff would:
 - CALL the contractor;
 - ii. VERIFY the COD;
 - iii. VERIFY if the damage was caused by the disaster; AND
 - iv. **ISSUE** an appeal inspection if appropriate.

NOTE: Appeal inspections are NOT requested when processing in **FEMA Manual Determination**. Refer to the <u>Appeal Processing</u> SOP for additional information.

c. FEMA Correction (FCOR) Inspection

- i. FCORs are requested when the previously completed inspection report contains ambiguous or conflicting information, is NOT detailed enough to make a determination, or when the inspection was NOT performed according to the Inspection Guidelines.
- ii. This type of inspection can be requested by staff, Housing Inspection Services (HIS) Quality Assurance (QA) team, HIS Task Monitors (TM) or by the contractors themselves.
- iii. The HIS TM's will determine which inspections will be returned for correction.
 - 1. HIS have specific criteria for making this determination to maintain consistency within this task.
 - 2. If the information in the applicant's file is sufficient to process or that the items in question DONOT interfere with the appropriate eligibility determination, the **FCOR** will NOT be issued.



- iv. For contractual reasons, HIS Management is required to reissue certain Quality Assurance (QA) inspections as FCOR inspections. When this occurs, a Workpacket (WP) is created in NEMIS. When the WP returns from inspection, it is normally returned to the FEMA Manual Determination queue.
 - If the correction indicates the applicant was underpaid on the initial inspection, SUPPLEMENT the applicant's award for the additional amount determined in the FCOR.
 - 2. If the correction indicates the applicant was overpaid, and there are no Gross Errors; ADD a Comment and ROUTE to FEMA Complete.
 - a. A **Gross Error** is noted when the item quantity and/or item pricing is unrealistic or exceeds the allowable program limit, e.g. the inspection exceeded the allowable quantity limit for a specific line item.

NOTE: For RP line items, the allowance quantity limit may be exceeded up to the amount recorded by the FEMA inspector. This is NOT permitted for PP line items.

- If the conflict is based on an issue of interpretation, e.g. the initial inspection listed the home as destroyed and the FCOR inspection listed the home as repairable; it would NOT be considered a Gross Error.
- b. Examples of **Gross Errors** include, but are NOT limited to:
 - i. The initial inspection recorded 24,500 SF of drywall and the **FCOR** inspection recorded 2,450 SF; OR
 - ii. The initial inspection recorded 200 outlets/switches and the **FCOR** inspection recorded 20.
- c. If a **Gross Error** is identified, **PLACE** the case on **Hold Program Review** and **EMAIL** the FEMA-IHP-Recoupment-Task-Force.
 - i. The Preliminary Debt Validation Review (PDVR) team will determine if a **Gross Error** has occurred.
- d. Refer to FEMA Correction for additional information.
- 3. If the correction returns to the **FEMA Manual Determination** queue before the initial inspection has been paid, process initial decision according to the **FCOR** inspection results.



4. When a FCOR inspection requested by Specialized Processing Unit (SPU) staff is returned, the WP should be manually routed to the FEMA Appeal queue for processing.

d. Geospatial Inspection

- In disasters where the impacted areas are inaccessible or too hazardous to fully perform onsite inspections, FEMA may use geospatial inspections to verify losses.
- ii. **Geospatial** inspections can be instrumental in FEMA's ability to quickly determine eligibility for many communities and expedite delivery of initial assistance to eligible applicants.
- iii. FEMA will use geospatial imagery to reasonably determine if a home is destroyed without requiring an onsite inspection.
 - 1. These files will be stamped **GIS_DEST** in the **Registration Status** screen.
 - 2. Applicants must meet all other standard eligibility criteria.
 - 3. Only one payment will be made per pre-disaster household to avoid duplication.

e. Inaccessible Inspection

- Inspection requested when the initial inspection is returned as Inaccessible because it is NOT possible for the inspector to reach a damaged unit due to a temporary condition caused by the disaster, e.g. high water, road and bridge washouts, etc.
- ii. When the applicant notifies FEMA that the above condition no longer exists, reissue the inspection.
- iii. **Inaccessible** will automatically default in the **Inspection Reason** drop-down menu for this type of inspection.

f. Initial Inspection

- i. The majority of initial inspections are auto-generated after **RI**. However, some applicants DO NOT receive one automatically.
- ii. For all disasters prior to and including DR-4606-LA, initial inspections should NOT be requested if the applicant failed identity and occupancy verification post-registration and has NOT submitted identity or occupancy documents.



- iii. For DR-4607-MI and forward, applicants that failed identity and occupancy verification post-registration will NOT be required to submit identity or occupancy documents prior to receiving an initial inspection.
 - REQUEST an initial inspection if the above requirements are met and the applicant has NOT had a previous inspection from FEMA. This includes, but is NOT limited to:
 - a. Non-referral (NONREF);
 - b. Non-registrations (NONREG);
 - c. IRND Ineligible Reported No Damage status (for all disasters prior to and including DR-4607-MI); AND
 - d. Insured (**INS**). Prior to requesting an initial inspection for an applicant with an **INS** status:
 - i. CONFIRM the applicant has submitted his/her insurance settlement or denial letter; AND
 - ii. The net insurance **settlement** is less than the Financial **HA** maximum, the financial ONA maximum, or both.
 - iii. For DR-4563-AL and forward, if the applicant receives an **IINR Ineligible Insured No Response** letter, they must include an appeal letter with any submission of insurance documents after the date of the **IINR**.
 - 1. Refer to Insurance Consideration for additional information.
 - 2. All disasters prior to and including DR-4606-LA, refer to the below table for additional information.

Owner/Renter?	IDV_Fail?	OCC_Fail?	Own_Fail?	Inspection?
Owner	Yes	No	Yes	No initial inspection
Owner	No	Yes	No.	No initial inspection
Owner.	Yes	Yes	Yes	No initial inspection
Owne <u>r</u>	No	Yes	Yes	No initial inspection
Owne <u>r</u>	Yes	No	No	No initial inspection
Owner	Yes.	Yes	No.	No initial inspection
Owner	No	No.	Yes.	REQUEST initial
Ownej				inspection
Owner	No.	No.	No.	REQUEST initial
Ownej				inspection
Renter	Yes	Yes	N/A	No initial inspection
Renter	No	Yes	N/A	No initial inspection
Renter	Yes.	No	N/A	No initial inspection





Renter	No	No	N/A	REQUEST initial
Renter				inspection

Table 1: Initial Inspection Decision Matrix for ONLY for disasters prior to and including DR-4606-LA

g. Missed Inspection

- i. Inspection requested after an applicant's first inspection is returned with a status of Ineligible Missed Inspection (**IMI**) when the applicant fails to keep two pre-arranged appointments with the inspector.
- ii. A second inspection will be issued when the applicant contacts FEMA and indicates they can meet with the inspector.
 - 1. A verbal or written inspection request is acceptable.
- iii. **CHOOSE Missed Inspection** from the **Inspection Reason** drop-down menu for this type of inspection.

h. No Contact Inspection

- Inspection requested when the first inspection is returned with a status of No Contact for Inspection (INCI) because an inspector has attempted and failed to contact an applicant.
- ii. A second inspection will be issued when the applicant contacts FEMA and indicates they can meet with the inspector.
 - 1. A verbal or written inspection request is acceptable.
- iii. **No Contact** will automatically default in the **Inspection Reason** drop-down menu for this type of inspection.

i. Outreach Inspection

- Inspection requested to allow contractors to identify inspections issued only for special projects.
- ii. DO NOT use this inspection type unless otherwise directed by your supervisor/Point of Contact (POC).

j. QA Reinspection Inspection

- Inspection requested to allow contractors to identify inspections issued only for special processes.
 - 1. When the **QA Reinspection** returns, an <u>Inspection Comparison</u> must be performed to determine if a supplemental payment is warranted.



ii. DO NOT use this inspection type. Used for FEMA in-house QA inspection process.

k. Reinspect Inspection

- Inspection requested by FEMA as a follow-up inspection following an internal review of case records. This includes:
- ii. When an initial inspection was incomplete; OR
- iii. When additional damages occurred within the designated incident period.
 - 1. The COD must be included in the disaster declaration.
 - a. When the Reinspect inspection returns, an <u>Inspection Comparison</u> must be performed to determine if a supplemental payment is warranted.
- Special Request Inspections: Congressional/Escalated/JFO High Priority Requests
 - i. **EMAIL** the inspection request to the IHP Helpdesk.

m. Special Request Inspections: ONA Program Requests

- i. The NEMIS Business Rules will automatically request an initial inspection when:
 - The Small Business Administration (SBA) status is referred back to ONA;
 - 2. The applicant indicated uninsured **PP** damages; AND
 - 3. A previous inspection has NOT been completed.
- ii. If an initial inspection has NOT been automatically requested, a manual request will need to be entered.

n. Withdrawn Inspection

- Inspection requested when the first inspection is returned with a status of Withdrawn (WVO) for HA categories or Withdrawn Voluntarily (WVOA) for ONA categories. Reasons for a WVO or WVOA status include:
 - 1. The applicant voluntarily withdrew their inspection;



- 2. The inspector withdrew the applicant due to unsuccessful contact attempts; OR
- 3. The applicant is displaced and has NOT submitted <u>Written Consent</u> authorization for a <u>third-party inspection</u>.
- The applicant may request the first Withdrawn inspection verbally or in writing.
- iii. Any requests for a third-party must be accompanied by a valid Written Consent authorization.
 - 1. **Withdrawn** will automatically default in the **Inspection Reason** drop-down menu for this type of inspection.

NOTE: When a second inspection is returned with a status of **INCI**, **IMI**, or **WVO**, the applicant must request a third inspection in writing. The type of inspection requested is based on the second inspection status given to the applicant.

- 3. How to Request an Inspection
 - a. ADD the PND/IPND line;
 - On the Assistance screen, CLICK Add on the Housing Assistance and/or PP/Other Assistances frame; AND
 - ii. **ADD** a **PND/IPND** line for each assistance category that requires an inspection. DO NOT add a **PND/IPND** line for Transportation Assistance unless an inspection is also being requested for HA and/or Personal Property.
 - 1. On the **Category** dropdown, **SELECT** the assistance type that requires an inspection;
 - On the Asst Type dropdown, SELECT Initial, Appeal, or Reconsideration, as appropriate;
 - 3. On the **Eligibility** dropdown, **SELECT PND** for uninsured applicants or **IPND** for insured applicants; AND
 - 4. CLICK Save.



NOTE: For Joint Option disasters, a **PND/IPND** CANNOT be added for ONA categories. ONA categories will be processed by the STT after the inspection returns.

- b. On the Inspection Summary screen, SELECT the Request Inspection link;
 - i. SET the Inspection Reason, e.g. Initial, Appeal, FCOR, etc.;
 - ii. **SET** the **Prior Inspection** if NOT requesting an initial inspection;
 - iii. SET Performed By to Contractor, unless otherwise directed;
 - iv. DO NOT update the Contractor or Priority settings. ENSURE the Priority is set as No.; AND
 - v. CLICK Save.
- c. ADD a Comment; AND
 - i. In the Comment Details explain the reason for the inspection request.
 - 1. When hotel/motel receipts are in the file, the case should be manually reviewed for Lodging Expense Reimbursement (**LER**).
 - 2. The **Comment** for an inspection request that includes LER should also contain the following:
 - a. "LER requested document is present in the file, please flag for manual review."
- d. ROUTE the WP to Send for Inspection.
- Insurance Consideration
 - a. If the applicant has a Homeowners Insurance policy (HOI) and the COD to the home is a covered peril(s) under the policy, the initial eligibility determination will be **INS**.
 - DO NOT request an Inspection until either:
 - 1. The Insurance Settlement or Denial letter is in the file; OR
 - 2. A verbal confirmation is received from the insurance company regarding the Insurance Settlement or Denial.



- For DR-4563-AL and forward, if the applicant receives an IINR –
 Ineligible Insured No Response letter, they must include an appeal letter
 with any submission of insurance documents after the date of the IINR.
- ii. The net insurance settlement must be under the respective Financial **HA** or **ONA** maximums before an inspection may be requested.
 - 1. If the net insurance settlement exceeds the Financial **HA** or **ONA** maximum, the applicant is ineligible in the respective **Category**. Refer to Step 4 of the Matrix for Initial Inspection for additional information.
 - a. DO NOT request an inspection;
 - b. PROCESS as INI/INFI with the Insurance Settlement exceeds FEMA Eligible Damage insert and ROUTE to FEMA Ineligible. Refer to the Web NEMIS Initial Assistance Reference Guide for additional information.
- iii. In the **Eligibility** field, **SELECT PND** if the applicant is uninsured for the COD or **IPND** if the applicant is insured for the COD. **REVIEW** the chart below for examples.
- iv. Example inspection request flow chart:

	USE the following when the	1е с	riteria above is met.
1.	If the applicant has damages from flood, and they have Flood Insurance	а.	REQUEST an inspection as IPND
2.	If the applicant has damages from flood, and they have HOI insurance but NOT flood insurance.	a.	REQUEST an inspection as PND
3.	If the applicant has damages covered by HOI or Renters insurance and has flood insurance but NOT HOI insurance.	a.	REQUEST an inspection as PND
4.	If the applicant has damages covered by both HOI or Renters insurance and Flood Insurance and has both Insurance types	a.	REQUEST an inspection as IPND
5.	If the applicant has Mobile Home Insurance, regardless of the COD.	а.	REQUEST an inspection as IPND
6.	If the applicant has NO insurance.	a.	REQUEST an inspection as PND

Table 1: PND and IPND Inspection Request

- b. Refer to the <u>Insurance Processing for HA and Personal Property</u> SOP for additional information.
- 5. Inspection Comparisons

Applicants can receive multiple inspections within a single disaster. Because of this, staff must manually complete a comparison of the total <u>FEMA Verified Loss</u> (**FVL**)



amounts for **HA** and/or ONA categories. The most recently completed inspection must be compared to all previous inspections.

NOTE: If an applicant was NOT previously provided IHP assistance and multiple inspections were completed, the last inspection will override the results of the previous inspections.

- a. For all inspection requests, a review of the Habitability Repairs Required (HRR) decision and a comparison of the previous and current <u>FVL</u> amounts must be completed for each category of HA and ONA.
- b. Changes to the **FVL** amounts may be due to:
 - i. Line items added or removed;
 - ii. Increase or decrease in the Repair/Replace Level (X, Y, or Z) for line items;OR
 - iii. An increase or decrease in the identified line item quantity.
- c. In the case that any subsequent inspection is completed after the initial, staff will have to process the new inspection results.

	Result from Inspection		Process
1,	HRR changes from NO to Yes	a.	PROCESS any applicable assistance according to posted procedures using the results from the most recent inspection.
		b.	Refer to the Appendix for information on using the Eligibility Calculators.
2.	HRR changes from YES to NO	a.	For inspections initiated from an applicant's request, e.g. Reinspect, Appeal, etc.; PROCESS applicable ineligible determination and ROUTE the file to FEMA Ineligible.
3.	NO assistance for the same category (HA or ONA) has been awarded based on the previous	a.	The most recent complete inspection will override the results of any previous inspections.
	inspection(s)	b.	PROCESS any applicable assistance using the results of this inspection according to posted procedures.
		C.	Refer to the Appendix for information on using the Eligibility Calculators.
4.	Any verifications change from Verified in the initial inspection	a.	GENERATE an ADOC to request missing verification requirements;
	to Not Verified in any of the subsequent inspection(s)	b.	CALL the applicant to inform them of the missing verifications;
	, , , , , , , , , , , , , , , , , , , ,	C,	ADD a Comment with a summary of the missing verifications; AND
		d.	ROUTE a WP to FEMA Pre-Recoupment Review.

Table 2: Inspection Comparison Chart



- d. If an inspection is completed and the applicant was previously awarded for the same category (**HA** or **ONA**), staff will have to do an inspection comparison.
 - COMPARE the total <u>FVL</u> between the most recent and previous inspection(s).
 - If the most recent inspection shows a greater <u>FVL</u> amount than the previous inspection(s), **REVIEW** the file for a possible supplemental payment.
 - a. There may be an unmet need.
 - i. If all other verifications are met, **PROCESS** the supplemental payment for **HA** and/or **ONA**.
 - ii. Refer to the <u>Appendix</u> for information on using the **Eligibility Calculators**.

If the total FVL amount increases				
If NO assistance was previously awarded	If assistance was previously awarded for the			
for the same category, PROCESS the	same category and all eligibility criteria remains			
initial award based on most recent	valid, PROCESS the supplemental award for the			
inspection.	difference in the <u>FVL</u> amounts.			

Table 3: FVL Increase

- b. When paying the supplemental award:
 - SELECT all eligible recorded amounts for the subsequent inspection on the Real Property Line Items and/or Personal Property Line Items frames.
 - ii. On the worksheet (HA and Other Assistance independently:
 - 1. **SELECT** the eligible determination, e.g. EHR, EPP.
 - 2. **DEDUCT** the amount of the previous award by using the **Previous Amt** field, **SELECT** the prior award line.
 - 3. ADD a Comment
 - 4. **ROUTE** to **Approval** queue.
- c. Refer to Inspection Comparison: Example 2
- 2. If the most recent inspection shows an equal **FVL** between inspections, the applicant will NOT be eligible for additional payment.



- a. **PROCESS** the ineligible decision to notify the applicant they are NOT eligible for additional assistance.
- b. Keep in mind, the applicant can be ineligible in HA but eligible in ONA or vice versa.
 - COMPARE all categories separately
- c. Refer to <u>Inspection Comparison: Example 4.</u>
- If the most recent inspection shows the <u>FVL</u> as less than the previous inspection(s), the applicant will NOT be eligible for supplemental payment.
 - a. **PROCESS** the ineligible decision to notify the applicant they are NOT eligible for additional assistance.

NOTE: Applicants can be ineligible for **HA** but eligible for ONA, or vice versa.

If the total FVL amount remains the same or decreases		
PROCESS the ineligible decision (for each category reviewed) to notify the		
applicant they are NOT eligible for addition	al assistance.	
The ineligible decision could be IID in the case of a Reinspect. However, other ineligibility decisions can apply such as INPR - Ineligible Not Primary Residence.	In HA, USE the combo wizard when addressing multiple decisions. In ONA, USE the ineligible decision that best applies and PERFORM a courtesy call to the applicant to explain the multiple denial reasons.	

Table 4: FVL Remains the Same or Decreases

- b. If the applicant has a previous eligibility determination:
 - i. **USE** the **A-INO** determination with the appropriate letter insert.
 - ii. ADD a Comment; AND
 - iii. ROUTE to Approval/Ineligible queue.
- e. Applicants have the option to submit documents for consideration.
 - If a payment is made under **Asst Type** of **FEMA Review** due to verified contractor estimates or receipts, Staff will manually review the line items separately.
 - 1. **FEMA Review** line items are manually addressed based on documents.
 - 2. Typically, no deduction for these awards is necessary.



- 3. Refer to Inspection Comparison: Example 6
- ii. Some applicants have insurance with additional coverage add-ons also known as insurance riders, e.g. Homeowners Insurance with Sewer Backup. This can alter the insurance coverage verifications to prevent a possible duplication of benefits.
 - 1. **FOLLOW** all standard insurance processing procedures.
 - If the COD for a line item changes from Not Insured in the initial inspection to Insured in any subsequent inspections, PERFORM an insurance comparison review.
 - 3. If an itemized settlement is voluntarily submitted by the applicant, REVIEW the line items previously awarded and the items recorded in the insurance settlement to determine if there are any items recorded by the inspection with a COD that is covered by the insurance. Refer to the <u>Insurance Processing for HA and Personal Property</u> SOP for additional information.
 - If any subsequent inspection returns with less <u>FVL</u> than the initial inspection, and the line item(s) was covered by the insurance settlement, ROUTE the case to FEMA Pre-Recoupment – Policy Review to review for a potential improper payment.
 - 5. Refer to Inspection Comparison: Example 8
- f. For returned **FCOR**, unless requested as part of a recoupment or appeal, no ineligible decision or letter will be processed.
 - If an FCOR returns with an increased <u>FVL</u> amount, PROCESS an eligible decision. Refer to the <u>Appendix</u> for information on using the <u>Eligibility</u> <u>Calculators</u>.
 - ii. If HRR remains No:
 - 1. **DELETE** the **PND** line;
 - 2. ADD a Comment; AND
 - 3. ROUTE the WP to FEMA Complete.
 - iii. If the FVL amount stays the same:
 - 1. **DELETE** the **PND** line;



- 2. ADD a Comment; AND
- 3. ROUTE the WP to FEMA Complete.
- iv. If there is a decrease in the <u>FVL</u> amount or information reflecting the applicant is NOT eligible for previously provided assistance:
 - 1. **DELETE** the **PND** line;
 - 2. ADD a Comment; AND
 - 3. ROUTE the WP to FEMA Complete.
- v. If an **FCOR** returns with an **HRR** change from **No** to **Yes** and the applicant is insured:
 - 1. **FOLLOW** all standard insurance processing procedures.
 - a. If <u>FVL</u> is greater the insurance settlement, **PROCESS** an eligible decision.
 - b. If the <u>FVL</u> is less than the insurance settlement, **PROCESS** an ineligible decision.
- 6. Third Party Inspections
 - Inspectors may have difficulties completing inspections because of displaced applicants/co-applicants.
 - In the case the applicant/co-applicant cannot accompany the inspector into the damaged dwelling address (DDA), the applicant MUST submit a <u>Written</u> <u>Consent</u> to identify an authorized third party to complete the inspection process.
 - 1. The applicant MUST provide a Written Consent letter, a completed Authorization for the Release of Information Under the Privacy Act form, or a Power of Attorney, Guardianship, or Conservatorship document to authorize a third party inspection.
 - 2. This authorizes a third party representative approved by the displaced applicant/co-applicant, e.g. friend, relative, landlord, policeman, fireman, etc.; to meet with the inspector and answer any necessary questions as part of the inspection.



- a. <u>Written Consent and Sharing Applicants Information</u> SOP for additional processing information.
- 3. Inspectors will only meet with the applicant, co-applicant, or an authorized third party to perform an inspection.
- 4. The third party MUST be over the age of 18 in order to attend the inspection on the applicant's/co-applicant's behalf.
- b. Before requesting an inspection, **OBTAIN** a <u>Written Consent</u> along with the following information from the applicant/co-applicant:
 - i. Third party name;
 - ii. Third party contact phone number; AND
 - iii. **VERIFY** in the file that the inspector will be able to gain entry to the DD (not required for Remote Inspections).
 - 1. If no:
 - a. DO NOT continue with the request for the third party inspection until the inspector can gain entry to the DD.
 - b. **PLACE** a courtesy call to the applicant/co-applicant and **INFORM** them that another inspection will NOT be requested until the DD is accessible and they will need to notify FEMA at that time.
 - 2. If yes:
 - a. **CONTINUE** issuing an inspection.
 - b. **PROVIDE** the applicant with the criteria for Written Consent. It must:
 - Be written or typed;
 - ii. Include the applicant's or co-applicant's first and last name listed in the file;
 - iii. Include the applicant's or co-applicant's date and place of birth;
 - iv. Include an individual identifier, such as the applicant's or coapplicant's registration number, current mailing address (CMA) or DDA, or Social Security Number (SSN);
 - c. ADD a Comment



- Summary Line: Facility # (NPSC#) THIRD PARTY INSPECTION REQUEST
- ii. Details:
 - 1. **LIST** the name of the authorized third party;
 - 2. **LIST** the contact number of the authorized third party; AND
 - 3. For **Appeal**, **Reinspect**, or **FCOR** inspections: **LIST** details on the items being appealed or needing special attention.
- c. Inspector Responsibilities
 - i. **COORDINATE** with the applicant's/co-applicant's authorized third party to perform a complete inspection.

D. Processing Ineligible Decisions

USE all standard ineligible decisions when processing returned inspections. **PROCESS** all denial decisions by category with the associated **Category**, **Asst Type**, and **Eligibility Code** selection or selections.

- 1. Standard ineligible determinations and reasons for denial include:
 - a. IID Home is Safe to Occupy
 - i. The most common ineligible code from a returned inspection is **IID**. This comes after the inspector verifies that the home is safe to occupy, or applicant did NOT receive enough damage from the disaster.
 - b. INDR Ineligible Damage Not Caused by the Disaster
 - The applicant has damages that the inspector cannot confirm were caused by the disaster.
 - c. IMI Ineligible Missed Inspection
 - The applicant scheduled an inspection with the inspector but missed the inspection. After the inspection is reissued and completed, staff will process the initial decision.
 - d. INCI Ineligible No Contact for Inspection



i. The inspector made three attempts to contact the applicant and was unsuccessful. After the inspection is reissued and completed, staff will process the initial decision.

e WVO – Ineligible Withdrew Voluntarily

i. For **HA** categories, once the inspector contacts the applicant, they can withdraw their application for FEMA assistance. Applicants can also receive this denial with the same meaning as **No Contact**.

f. WVOA – Ineligible Withdrew Voluntarily by Applicant

i. For ONA categories, once the inspector contacts the applicant, they can withdraw their application for FEMA assistance. Applicants can also receive this denial with the same meaning as **No Contact**.

g. INS or INSFI - Insurance

- Typically, these are auto-determination decisions created when the applicant has insurance coverage for the perils recorded during RI or during the inspection process.
- ii. These determinations are typically made prior to any comparison with actual insurance settlement or denial documents.

h. IIDV- Ineligible Failed Identity Verification

i. Unable to authenticate name and SSN.

E. Joint Option Disaster Information (ONA Only)

- 1. If processing a **Joint Option** Disaster:
 - a. ONA categories are only processed by the STT.
 - i. FEMA staff is authorized to process Housing Assistance (**HA**) categories.
- 2. If incoming mail generates a WP to a FEMA processing queue:
 - a. REVIEW/PROCESS any outstanding issues within HA categories.
 - If an additional WP is available in a state processing queue or subqueue; such as State Manual Determination, State Appeal, or State Supervisor Review; no further action for ONA is required.



- ii. If an additional WP is NOT available in a STT queue; AND
 - There are no HA categories to address:
 - a. ROUTE the existing WP to the State Manual Determination queue.
 - 2. There are **HA** categories to address:
 - a. On the Confirmation screen, SELECT the appropriate Routing location for all HA categories;
 - b. SELECT State Manual Determination for all ONA categories; AND
 - c. CLICK Submit.

F. Appeals

Appeal inspections are processed using standard appeal procedures. Refer to the <u>Appeal Processing SOP</u> for additional information.

G. Exceptions

There may be unique scenarios NOT specifically identified within this SOP that may require additional assistance:

- 1. If unable to determine eligibility using available SOPs, Disaster Specific Operation Procedures, or other posted information:
 - a. **CALL** the IHP Helpdesk at (b) (6) or the applicable extension number; or **EMAIL** the appropriate Supervisor/POC.
 - If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - EMAIL a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov).



IV. Examples and FAQs

Initial Inspection

- An applicant registers for disaster assistance and lists Home and PP damage as Unknown. The applicant then calls the Helpline to state that they did experience both Home and PP losses. The Helpline representative changes damages reported from Unknown to Yes.
 - a. The Helpline representative will **CREATE** a WP and **ROUTE** it to the **FEMA Manual Determination** queue in order to request an inspection.
 - b. In FEMA Manual Determination, ADD a PND/IPND line for both HA and PP;
 - c. <u>REQUEST the initial inspection</u>. **ENSURE** the **Priority** is set as **No**. DO NOT update the inspection priority.
- 2. **REVIEW** the matrix below to determine when to request an initial inspection.
 - a. all disasters prior to and including DR-4606-LA, applicants must verify occupancy and/or identity prior to requesting an initial inspection.
 - DR-4607-MI and forward, applicants that failed identity and occupancy verification post-registration will NOT be required to submit identity or occupancy documents prior to receiving an initial inspection.

	Matrix for Initial inspection					
Step	Question:	If / Then:	Question:	If/Then	Action in case:	
1.	Is the applicant claiming Home Damage?	No, CONTINUE to next column. Yes, CONTINUE with Step 2.	Is the applicant claiming PP damage?	No, CONTINUE to next column. Yes, CONTINUE with Step 2.	DO NOT request an inspection or add pending lines. REVIEW unmet needs for other categories, which DO NOT require an onsite inspection.	
	Is the applicant SBA dependent, e.g. SBA = HAPP or is the Disaster a Joint Option?	Yes, CONTINUE next column. No, CONTINUE with Step 3.	For SBA Dependent: DO NOT request an inspection or add a pending line for PP. REVIEW unmet needs for other categories, which DO NOT require an onsite inspection. (If there is still Home Damage to address, CONTINUE to Step 3.)			
2.			For a Joint Option: Is there an open WP in State Manual Determination queue?	No, CONTINUE to next column. Yes, CONTINUE with Step 3.	ROUTE WP to State Manual Determination queue. (If there is still Home Damage to address, CONTINUE to Step 3.)	



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Step	Question:	If / Then:	Question:	lf/Then	Action in case:
3.	Does the applicant have insurance that covers the COD?	Yes, CONTINUE to next column. No. CONTINUE with Step 4.	Is the denial, settlement, or verbal confirmation from insurance company available?	No, CONTINUE to next column. Yes, CONTINUE with Step 4.	CALL the insurance company and CONFIRM settlement or denial information. One call attempt is required. If confirmed, CONTINUE with Step 4. If NOT confirmed and the applicant has only received an INS decision, SELECT INI with the Missing Insurance Settlement/Denial Letter insert. If applicant has already received an INI decision, GENERATE an ADOC for missing insurance denial,
4.	Is the applicant uninsured for at least one category (RP or PP); OR Is the applicant underinsured for at least one category (RP or PP), e.g. the net settlement is less than the FVL recorded for the respective category, e.g. the net RP settlement is less than the FVL for RP items?	Yes, the applicant is uninsured or underinsured for either HA or PP, CONTINUE to next column. No. CONTINUE with Step 5a.	PND line for HA NOT update the If the applicant r verbal confirmat maximum; REQ	and PP. ENSURE inspection priority received an insurar tion that is less tha UEST an inspection of Priority is set as	settlement, or verbal confirmation. UEST an inspection using a the Priority is set as No. DO



	Matrix for Initial inspection						
Step	Question:	If / Then:	Question:	lf/Then	Action in case:		
5a.	Does the net insurance settlement exceed BOTH the financial HA and ONA maximum (when compared separately)?	Yes, the net insurance settlement exceeds BOTH the financial HA and ONA maximum, CONTINUE to next column. No. CONTINUE with Step 5b.	Is the applicant requesting assistance with HA and/or ONA ADA items?	the net insurance the financial HA a request inspection SELECT INI with exceeds FEMA E Yes, ADA items a insurance settlem financial HA and (IPND line for both the inspection. Or PROCESS according to the process according to the insurance settlem financial HA and (IPND line for both the inspection. Or PROCESS according to the inspection.	the Insurance Settlement Eligible Damage insert. The being requested and the ment exceeds BOTH the ONA maximums; CREATE and HA and PP and REQUEST ince the inspection returns, ding to posted guidance.		
5b.		No, the net insurance settlement exceeds one financial maximum, but NOT both; CONTINUE to last column.	N/A	exceed either the financial ONA ma line for BOTH HA inspection. Once	e settlement DOES NOT financial HA maximum or the ximum. CREATE an IPND and PP and REQUEST the the inspection returns, ding to posted guidance.		

Exception: If COD includes Flood, flood insurance is NOT a factor; FEMA will request flood insurance settlement/denial after the inspection is completed.

Table 5: Initial Inspection Matrix

Result: REQUEST an initial inspection or give appropriate eligibility determination.

Appeal Inspection

- An applicant submitted a written appeal letter stating that her FEMA award was NOT enough to repair the damages to her home. The applicant submitted an estimate from a contractor which included items reported on the initial inspection report. The applicant's SBA status is HAPP.
 - a. Staff processing in the **FEMA Appeal** queue will:
 - i. **VERIFY** with the contractor the COD and if the damage was disaster-caused;
 - ii. REQUEST an appeal inspection if appropriate. ENSURE the Priority is set as No. DO NOT update the inspection priority.

Result: REQUEST an Appeal inspection.

FEMA Correction



- During the FCOR, the inspector will focus on the items identified as needing review or correction. The FCOR inspector DOES NOT always require a revisit to the damage site or to meet with the applicant.
 - a. FCOR inspectors receive the previous inspection reports. They may only address those specific items needed by FEMA to make the appropriate eligibility determination.
 - i. Unless requested as part of a recoupment or appeal, no ineligible decision or letter will be processed for a returned **FCOR**.
 - If an FCOR returns with an increase in <u>FVL</u> amount, PROCESS all eligible assistance.
 - iii. If an FCOR returns with the same FVL amount:
 - 1. **DELETE** the **PND/IPND** line;
 - 2. ENTER a Comment; AND
 - 3. **ROUTE** the WP to **FEMA Complete**.
 - iv. If an **FCOR** returns with a decreased **FVL** amount or information reflecting the applicant is NOT eligible for previously provided assistance:
 - 1. **DELETE** the **PND/IPND** line;
 - 2. ENTER a Comment; AND
 - 3. **ROUTE** the WP to **FEMA Complete**.
 - v. If an FCOR returns and any verifications change from Verified to Not Verified such as Occupancy, REVIEW the file to see if acceptable documentation has been submitted. If acceptable documentation is NOT available:
 - 1. **DELETE** the **PND/IPND** line;
 - 2. **GENERATE** an **ADOC** letter to request missing information;
 - 3. **CALL** the applicant to **INFORM** them of the missing information;
 - 4. ADD a Comment with a summary of the missing);information AND
 - 5. ROUTE to FEMA Pre-Recoupment Policy Review.



vi. DO NOT process FCOR from the FEMA Supervisor Review – Inspection Correction subqueue.

Inspection Comparison Examples:

Scenario 1: FVL Increased - NO Previous Award

- 1. The total **FVL** increased and there is no previous award for the same **Category**.
 - a. Applicant has no RP or PP insurance.
 - b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,398.47.
 - c. Home Repair Assistance has NOT been previously processed;
 - d. **FCOR** inspection returns with:
 - i. **HRR = YES**; AND
 - ii. **FVL** = \$2,604.36.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL
5640	Floor Cover Replace	INITIAL	Hail/Rain/Wind	\$0.15	60	600	\$90.00
5644	Floor Sub Replace	INITIAL	Hail/Rain/Wind	\$1.33	583	583	\$775.39
5649	Drywall Replace	INITIAL	Hail/Rain/Wind	\$1.04	983	983	\$1,068.08
6348	Roof Metal Replace	INITIAL	Hail/Rain/Wind	\$0.93	500	500	\$465.00
5640	Floor Cover Replace	SECOND	Hail/Rain/Wind	\$0.15	803	803	\$120.45
5644	Floor Sub Replace	SECOND	Hail/Rain/Wind	\$1.33	583	583	\$775.39
5649	Drywall Replace	SECOND	Hail/Rain/Wind	\$1.04	1027	1027	\$1,022.32
6348	Roof Metal Replace	SECOND	Hail/Rain/Wind	\$0.93	500	500	\$465.00
6950	Skirting Replace	SECOND	Hail/Rain/Wind	\$1.40	158	158	\$221.20
	FVL for Initial Inspection						
	FVL for Second Inspection						
		•			Total Init	ial Award	\$2,604.36

Table 6: Increased FVL with no previous award(s)

- e. Since Home Repair Assistance was NOT previously awarded, and the FVL is greater from the FCOR inspection, the initial award will be processed for the FVL from the most current completed inspection, in this case the **FCOR** inspection.
- f. The applicant would be eligible for an initial award of \$2,604.36.



- g. Refer to the Appendix for information on using the Eligibility Calculators.
 - On the Home Repair Assistance Worksheet, SELECT the appropriate EHR/EHRZ status.

Result: **PROCESS** initial eligible decision for Home Repair. Assistance based on the **FCOR** amount of \$2,604.36.

Scenario 2: FVL Increased - Previous Award for Same Category

- 1. The total **FVL** increased and there is a previous award for the same **Category**.
 - a. Applicant has no RP or PP insurance.
 - b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,495.16.
 - c. Appeal inspection returns with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,969.48.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL
5640	Floor Cover Replace	INITIAL	Hail/Rain/Wind	\$0.15	803	803	HA Initial \$120.45
5644	Floor Sub Replace	INITIAL	Hail/Rain/Wind	\$1.33	583	583	HA Initial \$775.39
5649	Drywall Replace	INITIAL	Hail/Rain/Wind	\$1.04	983	983	HA Initial \$1,022.32
6348	Roof Metal Replace	INITIAL	Hail/Rain/Wind	\$0.93	50.0	50.0	HA Initial \$465.00
6950	Skirt Replace	INITIAL	Hail/Rain/Wind	\$1.40	80	80	HA Initial \$112.00
5640	Floor Cover Replace	SECOND	Hail/Rain/Wind	\$0.15	803	803	\$120.45
5644	Floor Sub Replace	SECOND	Hail/Rain/Wind	\$1.33	715	583	\$950.95
5646	Insulation, Wall, Replace	SECOND	Hail/Rain/Wind	\$0.45	238	238	\$107.10
5649	Drywall Replace	SECOND	Hail/Rain/Wind	\$1.04	1027	1027	\$1,022.32
6341	Cabinet, Base, Replace	SECOND	Hail/Rain/Wind	\$98.71	4	4	\$394.84
6342	Cabinet, Vanity, Replace	SECOND	Hail/Rain/Wind	\$93.91	2	2	\$187.82
6348	Roof Metal Replace	SECOND	Hail/Rain/Wind	\$0.93	200	200	\$186.00
	FVL for Initial Inspection						\$2,495.16
				FVL for Se	cond In	spection	\$2,969.48



Item #	Item Name	Insp	Dmg Type	Unit \$	Obs.	HA Qty	HA Award or FVL
				Total Sup	olementa	Award	\$474.32

Table 7: Increased FVL with previous award

- d. Since Home Repair Assistance was previously awarded based on the initial inspection, and the <u>FVL</u> is greater from the appeal inspection, the applicant is eligible for a supplemental payment. **COMPARE** the <u>FVL</u> between the initial (\$2,495.16) and **Appeal** (\$2,969.48) inspections.
- e. The applicant is eligible for the difference between the two inspections (\$2,969.48 \$2,495.16 = \$474.32).
- f. Refer to the Appendix for information on using the Eligibility Calculators.

Result: **PROCESS** eligible decision for Home Repair Assistance based on the inspection comparison amount of \$474.32.

Scenario 3: FVL Increased - Insured Applicant with Previous Award

- 1. The applicant has insurance, the total <u>FVL</u> increased, and a previous award was provided for the same **Category**.
 - a. Applicant has HOI and submitted their net settlement of \$1,250.
 - i. No additional adjustments to the net settlement were required.
 - b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. FVL = \$2,495.16.
 - 1. **DEDUCT** the Net Insurance Settlement from the **FVL**;
 - a. If positive amount, pay the difference. Refer to the <u>Appendix</u> for information on using the **Eligibility Calculators**;

\$2,495.16 FVL initial inspection
-\$1,250.00 Net Insurance Settlement
Initial EHR/EHRZ award

b. If negative, give ineligible decision of **INI or INFI** for the appropriate category.



- i. GENERATE the INI/INFI letter with the Insurance Settlement exceeds FEMA Eligible Damage insert.
- c. appeal inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,969.48.
 - DEDUCT the previous EHR/EHRZ award and the Net Insurance Settlement from the appeal inspection <u>FVL</u>. Refer to the <u>Appendix</u> for information on using the <u>Eligibility Calculators</u>;
 - a. **Appeal EHR/EHRZ** = \$474.32.

\$2,969.48 FVL appeal inspection
-\$1,245.16 Previous EHR/EHRZ Award
-\$1,250.00 Net Insurance Settlement
Supplemental EHR/EHRZ payment

Result: The **FVL** from the **Appeal** inspection is greater than the **FVL** results from the initial inspection. The applicant would be eligible for a supplemental payment. **PROCESS** the eligible decision for Home Repair Assistance based on the inspection comparison amount of \$474.32.

Scenario 4: FVL Remained Same

- 1. The FVL remains the same for both inspections in the same Category.
 - a. Applicant has no RP or PP insurance.
 - b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. FVL = \$2,398.47.
 - c. Appeal inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,398.47.



Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL
5640	Floor Cover Replace	INITIAL.	Hail/Rain/Wind	\$0.15	60	60	\$90.00
5644	Floor Sub Replace	INITIAL	Hail/Rain/Wind	\$1.33	583	583	\$775.39
5649	Drywall Replace	INITIAL	Hail/Rain/Wind	\$1.04	983	983	\$1,068.08
6348	Roof Metal Replace	INITIAL	Hail/Rain/Wind	\$0.93	500	500	\$465.00
5640	Floor Cover Replace	SECOND	Hail/Rain/Wind	\$0.15	60	60	\$90.00
5644	Floor Sub Replace	SECOND	Hail/Rain/Wind	\$1.33	583	583	\$775.39
5649	Drywall Replace	SECOND	Hail/Rain/Wind	\$1.04	983	983	\$1,068.08
6348	Roof Metal Replace	SECOND	Hail/Rain/Wind	\$0.93	500	500	\$465.00
	FVL for Initial Inspection						
	FVL for Second Inspection						
	Total Supplemental Award						

Table 8: FVL Remained the Same

d. If the <u>FVL</u> for the initial inspection equals the <u>FVL</u> for the appeal inspection, the applicant would be ineligible for a supplemental payment.

\$2,383.16	FVL appeal inspection
-\$2,383.16	FVL initial inspection
\$ 0.00	

NOTE: If the subsequent inspection was an FCOR, the applicant would NOT receive a decision. Staff must DELETE any PND/IPND lines, ENTER a Comment, and ROUTE to FEMA Complete.

Result: **PROCESS** the Home Repair Assistance **Appeal** decision as **INO** and **GENERATE** the eligibility letter with the **Additional Home Repair** insert.

Scenario 5: FVL Decreased - Previous Award for Same Category

- 1. The total <u>FVL</u> decreased and there is a previous award for the same **Category**.
 - a. Applicant has no **RP** or **PP** insurance.
 - b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,398.47.
 - c. Appeal inspection returns with:



- i. HRR = YES; AND
- ii. **FVL** = \$1,486.38.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL	
5640	Floor Cover Replace	INITIAL.	Hail/Rain/Wind	\$0,.15	60	60	\$90.00	
5644	Floor Sub Replace	INITIAL	Hail/Rain/Wind	\$1.33	583	583	\$775.39	
5649	Drywall Replace	INITIAL	Hail/Rain/Wind	\$1.04	983	983	\$1,068.08	
6348	Roof Metal Replace	INITIAL	Hail/Rain/Wind	\$0.93	500	500	\$465.00	
5640	Floor Cover Replace	SECOND	Hail/Rain/Wind	\$0.15	60	60	\$90.00	
5646	Insulation, Wall, Replace	SECOND	Hail/Rain/Wind	\$0.45	238	238	\$107.10	
5649	Drywall Replace	SECOND	Hail/Rain/Wind	\$1.04	983	983	\$1,068.08	
6950	Skirting Replace	SECOND	Hail/Rain/Wind	\$1.40	158	158	\$221.20	
	FVL for Initial Inspection							
	FVL for Second Inspection							
	Total Supplemental Award \$0.00							

Table 9: Decreased FVL with previous award

d. If the <u>FVL</u> for the initial inspection is greater than the <u>FVL</u> for the appeal inspection, the applicant would be ineligible for a supplemental payment.

Result: PROCESS the Home Repair Assistance Appeal decision as INO and GENERATE the eligibility letter with the Additional Home Repair insert. DO NOT create a WP for Pre-Recoupment Review due to an Appeal inspection returning with a lower FVL amount.

Scenario 6: FVL Increased - FEMA Review with Duplicated Line Items

- The total <u>FVL</u> increased and the applicant received a FEMA Review award with a duplicated line item in the same Category.
- 2. The applicant only has HOI and all damages were caused by Flood. Therefore, insurance documents are NOT required.

NOTE: DO NOT use the **Eligibility Calculator** when processing **FEMA Review** or Actual Cost line items. It will result in an incorrect payment. Staff should calculate the assistance by inputting the appropriate numbers into their desktop calculator application available on all computers.

a. Initial inspection returned with:



- i. HRR = YES; AND
- ii. **FVL** = \$1,965.75.
- b. Based on initial inspection and verified contractor's estimates:
 - i. HRR = YES; AND
 - ii. **FEMA Review** = \$3,939.56.
- c. Appeal inspection returns with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,436.57.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL		
5646	Insulation, Wall, Replace	INITIAL	Flood	\$1.03	268	268	HA Initial \$276.04		
5649	Drywall Replace	INITIAL	Flood	\$1.04	983	983	HA Initial \$1,022.32		
6440	Furnace, Clean-Test	INITIAL	Flood	\$145.49	1	1	HA Initial \$145.49		
6555	Ductwork, Replace	INITIAL	Flood	\$6.14	85	85	HA Initial \$521.90		
6556	Water heater, Replace	FEMA Review	Flood	\$1,089.56	1	1	HA FEMA Review \$1,089.56		
8000	Furnace, Actual	FEMA Review	Flood	\$2,850.00	1	1	HA FEMA Review \$2,850.00		
5341	Door, Interior, Replace	SECOND	Flood	\$106.32	3	3.	HA Appeal \$318.96		
5646	Insulation, Wall, Replace	SECOND	Flood	\$1.03	159	159	HA Appeal \$163.77		
5649	Drywall Replace	SECOND	Flood	\$1.04	983	983	HA Appeal \$1,022.32		
6341	Cabinet, Base, Replace	SECOND	Flood	\$134.12	5	5	HA Appeal \$670,60		
6342	Cabinet, Vanity, Replace	SECOND	Flood	\$93.91	2	2	HA Appeal \$145.49		
6555	Water heater, Repair	SECOND	Flood	\$115,43	1	1	HA Appeal \$115.43		
FVL for Initial Inspection									
FVL for Second Inspection									
	FVL for Second Inspection Total Supplemental Award								

Table 10: Increased FVL with multiple FEMA Review items

d. The second inspection includes **6555 Water heater**, **Repair**, which is a duplication with **6556 Water heater**, **Replace** on the **FEMA Review**. Therefore,



the duplicated amount must be deducted on the **Worksheet** for the Appeal award.

\$2,436.57	FVL appeal inspection
-\$1,965.75	FVL initial inspection
<u>-\$ 115.43</u>	Water heater, Repair (Recorded in appeal inspection)
\$ 355.39	Supplemental Payment

Result: PROCESS the difference between the initial inspection and the appeal inspection and DEDUCT \$115.43 Water heater, Repair on the Worksheet. Applicant is eligible for Home Repair Assistance based on the inspection comparison in the amount of \$355.39.

Scenario 7: FVL Increased - FEMA Review with Non-Duplicated Line Items

1. The total <u>FVL</u> increased and the applicant received a **FEMA Review** award with non-duplicated line items in the same **Category**.

NOTE: DO NOT use the **Eligibility Calculator** when processing **FEMA Review** or Actual Cost line items. It will result in an incorrect payment. Staff should calculate the assistance by inputting the appropriate numbers into their desktop calculator application available on all computers.

- Applicant has no RP or PP insurance.
- b. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. FVL = \$2,081.18.
- c. Based on initial inspection and verified contractor's estimates:
 - i. HRR = YES; AND
 - ii. **FEMA Review** = \$1,089.56.
 - iii. When processing the **FEMA Review**, **DEDUCT** any duplicated line items from the initial inspection.

\$1,204.99	Water heater, Replace on FEMA Review
<u>-\$ 115.43</u>	Water heater, Repair on initial inspection
\$1,089.56	Supplemental FEMA Review payment





- d. Appeal inspection returns with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,321.14.
 - iii. The Water heater, Repair line item was previously deducted when processing the FEMA Review payment. Therefore, it DOES NOT need to be deducted again. When processing the appeal inspection, **DEDUCT** only the initial inspection line items that were NOT deducted with the FEMA Review.

\$2,321.14 **FVL** appeal inspection

<u>-\$1,965.75</u> **FVL** initial inspection (NOT including Water heater, Repair)

Supplemental payment \$ 355.39

Item #	Item Name	Insp	Dmg Type	Unit \$	Ob <u>s</u>	HA Qty	HA Award or FVL	
5646	Insulation, Wall Replace	INITIAL	Flood	\$1.03	268	268	HA Initial \$276.04	
5649	Drywall Replace	INITIAL	Flood	\$1.04	983	983	HA Initial \$1,022.32	
6440	Furnace, Clean-Test	INITIAL	Flood	\$145.49	1	1	HA Initial \$145.49	
6454	Ductwork, Replace	INITIAL	Flood	\$6.14	85	85	HA Initial \$521.90	
6,5,55	Water heater, Repair	INITIAL	Flood	\$115.43	1	1	HA Initial \$115.43	
6556	Water heater, Replace	FEMA Review	Flood	\$1,089.56	1	1	HA FEMA Review \$1,204.99	
5341	Door, Interior, Replace	SECOND	Flood	\$106.32	3	3	HA Appeal \$318.96	
5646	Insulation, Wall, Replace	SECOND	Flood	\$1.03	159	159	HA Appeal \$163.77	
5649	Drywall Replace	SECOND	Flood	\$1.04	983	983	HA Appeal \$1,022.32	
6341	Cabinet, Base, Replace	SECOND	Flood	\$134.12	5,	5	HA Appeal \$670.60	
6342	Cabinet, Vanity, Replace	SECOND	Flood	\$93.91	2	2	HA Appeal \$145.49	
	FVL for Initial Inspection							
	FVL for Second Inspection							
	Total Supplemental Award							

Table 11: Increased FVL with FEMA Review item



Result: **PROCESS** eligible decision for Home Repair Assistance based on the inspection comparison in the amount of \$355.39.

Scenario 8: FVL Increased – COD Changed

- The total <u>FVL</u> increased with a previous award in the same <u>Category</u>; and, the COD changed in the second inspection. Refer to the <u>Appendix</u> for information on using the <u>Eligibility Calculators</u>.
 - a. Applicant has HOI with a Sewer Backup (SBU) rider.
 - b. All damages in the initial inspection were recorded with Flood as the COD.
 - c. Initial inspection returned with:
 - i. HRR = YES; AND
 - ii. **FVL** = \$2,655.09.
 - d. Appeal inspection returned with:
 - i. HRR = YES;
 - ii. **FVL** = \$1,904.81 (Flood); AND
 - iii. **FVL** = \$857.38 (SBU).
 - e. The COD for line item **6556 Water heater**, **Replace** changed from Flood in the initial inspection to SBU in the appeal inspection.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL
5644	Floor Sub Replace	INITIAL	Flood	\$1.33	583	583	HA Initial \$775.39
5649	Drywall Replace	INITIAL	Flood	\$1.04	983	983	HA Initial \$1,022.32
6556	Water heater, Replace	INITIAL	Flood	\$857.38	1	1	HA Initial \$857.38
5644	Floor Sub Replace	SECOND	Flood	\$1.33	583	583	\$775,39
5646	Insulation, Wall, Replace	SECOND	Flood	\$0.45	238	238	\$107.10
5649	Drywall Replace	SECOND	Flood	\$1.04	983	983	\$1,022.32
655 <u>6</u>	Water heater, Replace	SECOND	SBU	\$857.38	1	1	\$857.38
	\$2,655.09						



Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL		
	FVL for Second Inspection (COD = Flood)								
	FVL for Second Inspection (COD = SBU)								
				Total S	upplement	al Award	\$ *See Below*		

Table 12: Increased FVL with COD change

- f. The <u>FVL</u> for Flood damaged items in the appeal inspection (\$1,904.81) is less than the <u>FVL</u> for Flood damaged items in the initial inspection (\$2,655.09). Since the applicant has HOI with an SBU rider, an insurance comparison must be completed to determine if the SBU damaged item was covered by the insurance.
 - If an itemized settlement is voluntarily submitted by the applicant, COMPARE
 all line items awarded from the initial inspection to the items listed in the
 insurance settlement.

Result One: If the SBU line item was NOT covered by the insurance settlement, **PROCESS** a supplemental payment for the difference between the combined second inspection **FVL** and the initial inspection **FVL** totaling \$107.10.

Result Two: If the SBU line item was covered by the insurance settlement; or, the applicant has NOT submitted an insurance settlement/denial letter:

PROCESS an INI/INFI with the Missing Insurance Settlement/Denial Letter insert; AND

CREATE a WP to **FEMA Pre-Recoupment – Policy Review** due to a potential DOB with insurance.

Scenario 9: <u>FVL</u> Decreased – Multiple CODs Recorded in Both Inspections:

- The total <u>FVL</u> decreased with a previous award in the same <u>Category</u>; but Wind and Flood are recorded in both inspections. Refer to the <u>Appendix</u> for information on using the <u>Eligibility Calculators</u>.
 - a. Applicant DOES NOT have HOI or Flood Insurance.
 - b. Damages in both inspections were recorded with Flood and Wind as the COD.
 - c. Initial inspection returned with:
 - i. HRR = YES;



- ii. FVL (Flood) = \$857.38; AND
- iii. **FVL** (Wind) = \$1,797.71.
- d. Appeal inspection returned with:
 - i. HRR = YES;
 - ii. <u>FVL</u> (Flood) = \$1,103.53; AND
 - iii. FVL (Wind) = \$1,340.09.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs.	HA Qty	HA Award or FVL	
5644	Floor Sub Replace	INITIAL.	Wind	\$1.33	583	583	HA Initial \$775.39	
5649	Drywall Replace	INITIAL	Wind	\$1.04	983	983	HA Initial \$1,022,32	
6556	Water heater, Replace	INITIAL	Flood	\$857.38	1	1	HA Initial \$857.38	
5644	Floor Sub Replace	SECOND	Wind	\$1,33	583	583	\$775.39	
5646	Insulation, Wall, Replace	SECOND	Wind	\$0.45	238	238	\$10,7,10	
5649	Drywall Replace	SECOND	Wind	\$1.04	440	440	\$457.60	
6556	Water heater, Replace	SECOND	Flood	\$857.38	1	1	\$857,38	
6461	Furnace, Clean and Repair	SECOND	Flood	\$246.15	1	1	\$246.15	
		•	•	Total FVL	for Initial I	nspection	\$2,655.09	
			FVL for	Initial Inspe	ection (COD	= Flood)	\$857.38	
	FVL for Initial Inspection (COD = Wind)							
	\$2,443.62							
FVL for Second Inspection (COD = Flood)							\$1,103.53	
FVL for Second Inspection (COD = Wind) Total Supplemental Award							\$1,340.09	
	\$ *See Below*							

Table 13: FVL Decreased - Multiple CODs Recorded in Both Inspections

- 2. The total <u>FVL</u> for the second inspection is less than the total <u>FVL</u> for the initial inspection. However, since there are different CODs recorded, a comparison for each COD must be completed separately.
 - a. The <u>FVL</u> for Flood damaged items in the appeal inspection (\$1,103.53) is greater than the <u>FVL</u> for Flood damaged items in the initial inspection (\$857.38). Since the applicant DOES NOT have Flood Insurance, they are eligible for the difference (\$246.15) between the first and second inspection for Flood damages.
 - b. The <u>FVL</u> for Wind damaged items in the appeal inspection (\$1,340.09) is less than the <u>FVL</u> for Wind damaged items in the initial inspection (\$1,797.71). Since



the <u>FVL</u> for Wind damaged items decreased, they are ineligible for additional assistance for the Wind damaged items.

Result: PROCESS eligible decision for Home Repair Assistance based on the inspection comparison in the amount of \$246.15. If the applicant is in a Flood Zone A, V, or W; USE the EHRZ eligibility code. Otherwise, USE the EHR eligibility code.

Scenario 10: <u>FVL</u> Decreased – New COD Recorded in Second Inspection:

- The total <u>FVL</u> decreased with a previous award in the same <u>Category</u>. However, there is a COD (Flood) recorded in the second inspection that was NOT recorded in the initial inspection. Refer to the <u>Appendix</u> for information on using the <u>Eligibility</u> <u>Calculators</u>.
 - a. Applicant DOES NOT have HOI or Flood Insurance.
 - b. Initial inspection returned with:
 - i. HRR = YES;
 - ii. FVL (Wind) = \$2,762.19.
 - c. Appeal inspection returned with:
 - HRR = YES;
 - ii. **FVL** (Flood) = \$246.15; AND
 - iii. **FVL** (Wind) = \$1,314.98.

Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL
5644	Floor Sub Replace	INITIAL	Wind	\$1.33	583	583	HA Initial \$775.39
5649	Drywal <u>l</u> Replace	INITIAL	Wind	\$1.04	983	983	HA Initial \$1,022.32
6556	Water heater, Replace	INITIAL	Wind	\$857.38	1	1	HA Initial \$857.38
5646	Insulation, Wall, Replace	INITIAL	Wind	\$0.45	238	238	HA Initial \$107.10
5649	Drywall Replace	SECOND	Wind	\$1.04	440	440	\$457.60
6556	Water heater, Replace	SECOND	Wind	\$857.38	1	1	\$857,38
6461	Furnace, Clean and Repair	SECOND	Flood	\$246.15	1	1	\$246.15



Item #	Item Name	Insp	Dmg Type	Unit \$	Obs	HA Qty	HA Award or FVL		
	Total FVL for Initial Inspection								
	FVL for Initial Inspection (COD = Wind)								
				otal FVL for		•			
			FVL for Se	cond Inspec	tion (COD	= Flood)	\$246.15		
	FVL for Second Inspection (COD = Wind)								
		•	•	Total S	upplement	al Award	\$ *See Below*		

Table 14: FVL Decreased - New COD Recorded in Second Inspection

- 2. The total <u>FVL</u> for the second inspection is less than the total <u>FVL</u> for the initial inspection. However, since there is a COD (Flood) that was NOT recorded in the initial inspection, a comparison for each COD must be completed separately.
 - a. The <u>FVL</u> for Wind damaged items in the appeal inspection (\$1,314.98) is less than the <u>FVL</u> for Wind damaged items in the initial inspection (\$2,762.19). Since the <u>FVL</u> for Wind damaged items decreased, they are ineligible for additional assistance for the Wind damaged items.
 - b. The <u>FVL</u> for Flood damaged items in the appeal inspection is \$246.15. Since Flood damages were NOT recorded in the initial inspection, the applicant is eligible for assistance for the Flood damaged items.

Result: PROCESS eligible decision for Home Repair Assistance based on the inspection comparison in the amount of \$246.15. If the applicant is in a Flood Zone A, V, or W; USE the EHRZ eligibility code. Otherwise, USE the EHR eligibility code.



V. DEFINITIONS AND ACRONYMS

Definitions

FEMA Verified Loss (FVL): The total dollar amount of IHP eligible disaster-caused damage to real and personal property as verified by FEMA. The **FVL** represents the total potentially eligible damage, but due to insurance coverage, the financial Housing Assistance maximum, and other eligibility factors; an applicant may NOT ultimately receive assistance for their full **FVL**.

Financial Housing Assistance Maximum: Financial assistance for Home Repair Assistance and Home Replacement Assistance for owner-occupied homes is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor's Consumer Price Index (CPI) for All Urban Consumers.

Financial Other Needs Assistance Maximum: Financial assistance for ONA Personal Property, Transportation, Moving and Storage, Medical and Dental, Funeral, Child Care, and Miscellaneous Items is limited to a maximum award amount, adjusted each fiscal year based on the Department of Labor's CPI for All Urban Consumers.

Signature: A valid signature may be evidenced by any mark made by pen or pencil denoting the signer's name or mark; a mark or name created and adopted through a software program such as Microsoft Word; adoption of an electronic signature that includes typing a name or mark at the end of an email; a digital image of a handwritten signature or mark; the click of an "I accept" button on an e-commerce site as his or her legal signature; or adoption of an electronic symbol, sound, or process that is attached to, or logically associated with, the document and executed by the applicant or his or her agent, with the intent to sign the document.

Acronyms

Inspection A	Abbreviations an	d Definitions			
ADD'L	Additional	ASST	Assistance	AMT	Amount
APP	Applicant	BDRM	Bedroom	BLK	Block
BRKR	Breaker	BSMT	Basement	CC	Concrete
СНК	Check	C/S or C&S	Clean and Sanitize	CY	Cubic Yard
DBL	Double	DL	Driver License	DMG	Damage
DNG or DNG RM	Dining Room	DOD	Degree of Damage	DPA	Damaged Property Address
DR	Disaster	DW	Doublewide	DWMH	Double Wide Mobile Home
ESS TOOLS	Essential Tools	EXT ONLY	Exterior Only Inspection	FF	First Floor
FHU	FEMA Housing Unit	FL	Floor	FLR COV or FC	Floor Covering
FWC	Floors, Walls, and Ceilings	H2O HTR or WH	Water Heater	HDWD	Hard Wood



ннс	Household Composition	нwм	High Water Mark	INA or INACC	Inaccessible
INSL	Insulation	INT.	Interior	LR	Living Room
LS	Lump Sum	M/H	Mobile Home	мон	Member of Household
		M/S or M&S	Moving and Storage	NA	Not Affected
NCD	Not Caused by the Disaster	NFCOR	Not a FEMA Correction	NFTR	Not Feasible to Repair
NO VIS EXT RP	No Visible Exterior Damage	OCC VRFN	Occupancy Verification	OR	Official Record
POE	Point of Entry	PWR	Power	PS	Power Surge
SFRB	Single Family Road and Bridge	SIG	Signature	SOR	Size of Residence
SR	Sheet Rock	SSF	Safe, Sanitary, and Functional	STMNT	Statement
SW	Single Wide	UOM	Unit of Measure	WL	Water Level

Table 13: Insurance Abbreviations and Definitions

ACE Automated Construction Estimator

ADA Americans with Disabilities Act

CBRS Coastal Barrier Resources System

CCOR Contractor Correction

CMA Current Mailing Address

COD Cause of Damage

DDA Damaged Dwelling Address

DRC Disaster Recovery Center

DSA Disaster Survivor Assistance

DSOP Disaster Specific Operating Procedures

FCOR FEMA Correction

FVL FEMA Verified Loss

HIS Housing Inspection Services

HOI Homeowners Insurance



HRR Home Repairs Required

IDV_PASS Identity Verification Passed

IHP Individuals and Households Program

IINS Ineligible Insurance Coverage

INS Insurance

JFO Joint Field Office

LL Landlord

NCOMP Non-Compliant with Flood Insurance Requirement

NFIP National Flood Insurance Program

NFIRA National Flood Insurance Reform Act

NPR Not Primary Residence

ONA Other Needs Assistance

POA Power of Attorney

POC Point of Contact

PP Personal Property

QA Quality Assurance

RP Real Property

SBA Small Business Administration

SBU Sewer Backup

SC Sanctioned Community

STT State, territorial, or tribal government

TM Task Monitor

WDR Wind Driven Rain

WVO Withdrawn Voluntarily



WVOA Withdrawn Voluntarily by Applicant

WP Workpacket



VI. RELATED GUIDANCE

Please refer to the following documents:

- Standard Operating Procedures
 - Appeal Processing
 - Codes, Verifications, Request Letters, and Assistance Types
 - Flood Zones and Other Protected Areas
 - o Funeral Assistance
 - o Insurance Processing for HA and Personal Property
 - Outbound Calls and Third Party Verifications
 - SBA Referrals
 - Written Consent and Sharing Applicants Information

Resources

- Disaster Specific Information
- Helpline NPSC Caller Services Reference Guide
- Processing Procedures Manual (PPM)
- Web NEMIS Initial Assistance Reference Guide



VII. APPENDIX: ELIGIBILITY CALCULATORS

Real Property (RP) Eligibility Calculator

NOTE: Staff are NOT required to use the **RP Eligibility Calculator**. However, if they decide to use it, staff **must** follow the below instructions to ensure proper awards are being provided. Staff may also refer to the <u>Web NEMIS Appeals Reference Guide</u> for additional information.

Before using the RP Eligibility Calculator, USE the Edit link on the Real Property Line Items frame to make any needed adjustments to each line item, e.g. decrease or zero-out the HA Quantity amount, adjust the Insured/Not Insured status, adjust the COD, etc.

- 1. Observed and HA Quantity Amount Matches (Same COD):
 - a. On the Real Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the **Inspection and Insurance Comparison** frame, **SELECT** each inspection that requires comparison.
 - For each inspection, CLICK Select under the Insurance Compare column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate.
 - REVIEW the Final Pending Eligible Amount to ensure it is correct;
 - v. **ENSURE** the **Do Not Add to Calculator** box is NOT checked;
 - vi. ENTER a Comment in the Notes field to explain your calculations;
 - vii. CLICK Save; AND
 - viii.CLICK Close.



- 2. Observed Amount GREATER Than the HA Quantity Amount (Same COD):
 - a. On the Real Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the **Inspection and Insurance Comparison** frame, **SELECT** each inspection that requires comparison;
 - 1. For each inspection, **CLICK Select** under the **Insurance Compare** column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate;
 - USE your desktop calculator to determine the Overpayment or Underpayment amount by deducting the Eligible Amount from the Observed Amount for each inspection.
 - CLICK the Adjustment link for each inspection and ENTER the amount you calculated.
 - a. If entering an adjustment for an **Underpayment**, **ENTER** a negative (-) symbol in front of each entry in the **Adjustment** link.
 - b. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
 - 3. CLICK Calculate.
 - 4. CLICK Save.
 - iv. REVIEW the Final Pending Eligible Amount to ensure it is correct;
 - v. ENSURE the Do Not Add to Calculator box is NOT checked;
 - vi. **ENTER** a **Comment** in the **Notes** field to explain your calculations;
 - vii. CLICK Save; AND
 - viii.CLICK Close.



3. More than one COD Recorded (e.g. Wind changed to Flood):

When more than one COD is recorded between inspections, an adjustment will be required when using the **RP Eligibility Calculator**.

- a. On the Real Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the Inspection and Insurance Comparison frame, SELECT each inspection that requires comparison;
 - For each inspection, CLICK Select under the Insurance Compare column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate;
 - 1. For both inspections:
 - a. If the Observed Amount is greater than the Eligible Amount, USE your desktop calculator to determine the Overpayment or Underpayment amount by deducting the Eligible Amount from the Observed Amount for each inspection; AND
 - b. **CLICK** the **Adjustment** link on each inspection and **ENTER** the amount you calculated for that inspection.
 - i. If entering an adjustment for an **Underpayment**, **ENTER** a negative
 (-) symbol in front of each entry in the **Adjustment** link.
 - ii. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
 - 2. For the second inspection:
 - a. CLICK the Adjustment link and ENTER the Eligible Amount for the COD that has changed.



- 3. CLICK Calculate.
- 4. CLICK Save.
- iv. **REVIEW** the **Final Pending Eligible Amount** to ensure it is correct;
- v. ENSURE the Do Not Add to Calculator box is NOT checked;
- vi. ENTER a Comment in the Notes field to explain your calculations;
- vii. CLICK Save; AND
- viii.CLICK Close.

4. ADA Items Included in Inspection:

All ADA and non-ADA items **must** be processed separately. Prior to using the **RP Eligibility Calculator**, **ENSURE** that all ADA items have been unselected on **Real Property Line Items** frame.

USE the instructions below to deduct the ADA eligible amount on the **RP Eligibility** Calculator.

- a. On the Real Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the Inspection and Insurance Comparison frame, SELECT each inspection that requires comparison;
 - 1. For each inspection, **CLICK Select** under the **Insurance Compare** column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate;
 - 1. For the initial inspection:
 - a. If the **Observed Amount** is greater than the **Eligible Amount**, **USE** your desktop calculator to determine the **Overpayment** or



Underpayment amount by deducting the **Eligible Amount** from the **Observed Amount** for each inspection; AND

- b. **CLICK** the **Adjustment** link on each inspection and **ENTER** the amount you calculated for that inspection.
 - i. If entering an adjustment for an **Underpayment**, **ENTER** a negative
 (-) symbol in front of each entry in the **Adjustment** link.
 - ii. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
- 2. For the second inspection:
 - a. CLICK the Adjustment link and ENTER the total eligible ADA amount.
 - A negative (-) symbol must be added in front of the entry in the Adjustment link.
- iv. CLICK Calculate.
- v. CLICK Save.
- vi. **REVIEW** the **Final Pending Eligible Amount** to ensure it is correct;
- vii. **ENSURE** the **Do Not Add to Calculator** box is NOT checked;
- viii. **ENTER** a **Comment** in the **Notes** field to explain your calculations;
- ix. CLICK Save; AND
- x. CLICK Close.

Personal Property (PP) Eligibility Calculator

NOTE: Staff are NOT required to use the **PP Eligibility Calculator**. However, if they decide to use it, staff **must** follow the below instructions to ensure proper awards are being provided. Staff may also refer to the <u>Web NEMIS Appeals Reference Guide</u> for additional information.

Before using the PP Eligibility Calculator, USE the Edit link on the Personal Property Line Items frame to make any need adjustments to each line item, e.g. decrease or zero-out the Quantity amount, adjust the Insured/NOT Insured status, adjust the COD, etc.

1. Observed and Quantity Amount Matches (Same COD):



- a. On the Personal Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the **Inspection and Insurance Comparison** frame, **SELECT** each inspection that requires comparison.
 - For each inspection, CLICK Select under the Insurance Compare column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate.
 - iv. REVIEW the Final Pending Eligible Amount to ensure it is correct;
 - v. ENSURE the Do Not Add to Calculator box is NOT checked;
 - vi. **ENTER** a **Comment** in the **Notes** field to explain your calculations;
 - vii. CLICK Save; AND
- 2. Observed Amount GREATER Than Quantity Amount (Same COD):
 - a. On the Personal Property Line Items frame, CLICK Eligibility Calculator.
 - On the Eligibility Calculator History window, CLICK Add;
 - ii. On the **Inspection and Insurance Comparison** frame, **SELECT** each inspection that requires comparison;
 - 1. For each inspection, **CLICK Select** under the **Insurance Compare** column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - On the Eligibility Summary frame, CLICK Calculate;



- USE your desktop calculator to determine the Overpayment or Underpayment amount by deducting the Eligible Amount from the Observed Amount for each inspection.
 - a. The **Eligible Amount** is the amount that was paid to the applicant from the previous inspection(s).
 - b. If the **Eligible Amount** has NOT been paid, it can be determined by adding the **Quantity** amount for each eligible line item.
- CLICK the Adjustment link for each inspection and ENTER the difference amount you calculated.
 - a. If entering an adjustment for an **Underpayment**, **ENTER** a negative (-) symbol in front of each entry in the **Adjustment** link.
 - b. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
- CLICK Calculate.
- 4. CLICK Save.
- REVIEW the Final Pending Eligible Amount to ensure it is correct;
- v. **ENSURE** the **Do Not Add to Calculator** box is NOT checked;
- vi. **ENTER** a **Comment** in the **Notes** field to explain your calculations;
- vii. CLICK Save; AND
- viii.CLICK Close.
- 3. More than one COD Recorded (e.g. Wind changed to Flood):

When more than one COD is recorded between inspections, an adjustment will be required when using the **PP Eligibility Calculator**.

- a. On the Personal Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the Inspection and Insurance Comparison frame, SELECT each inspection that requires comparison;



- For each inspection, CLICK Select under the Insurance Compare column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
- iii. On the Eligibility Summary frame, CLICK Calculate;
 - 1. For both inspections:
 - a. If the Observed Amount is greater than the Eligible Amount, USE your desktop calculator to determine the Overpayment or Underpayment amount by deducting the Eligible Amount from the Observed Amount for each inspection; AND
 - b. **CLICK** the **Adjustment** link on each inspection and **ENTER** the amount you calculated for that inspection.
 - i. If entering an adjustment for an **Underpayment**, **ENTER** a negative
 (-) symbol in front of each entry in the **Adjustment** link.
 - ii. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
 - 2. For the second inspection:
 - a. CLICK the Adjustment link and ENTER the Eligible Amount for the COD that has changed.
 - 3. CLICK Calculate.
 - 4. CLICK Save.
- iv. REVIEW the Final Pending Eligible Amount to ensure it is correct;
- v. **ENSURE** the **Do Not Add to Calculator** box is NOT checked;
- vi. **ENTER** a **Comment** in the **Notes** field to explain your calculations;
- vii. CLICK Save; AND
- viii.CLICK Close.

4. ADA Items Included in Inspection:

All ADA and non-ADA items **must** be processed separately. **USE** the instructions below to deduct the ADA eligible amount on the **PP Eligibility Calculator**.

- a. On the Personal Property Line Items frame, CLICK Eligibility Calculator.
 - i. On the Eligibility Calculator History window, CLICK Add;
 - ii. On the **Inspection and Insurance Comparison** frame, **SELECT** each inspection that requires comparison;
 - 1. For each inspection, **CLICK Select** under the **Insurance Compare** column.
 - a. On the Select Insurance window, SELECT the appropriate insurance line; AND
 - b. CLICK Save.
 - iii. On the Eligibility Summary frame, CLICK Calculate;
 - 1. For the initial inspection:
 - a. If the Observed Amount is greater than the Eligible Amount, USE your desktop calculator to determine the Overpayment or Underpayment amount by deducting the Eligible Amount from the Observed Amount for each inspection; AND
 - b. **CLICK** the **Adjustment** link on each inspection and **ENTER** the amount you calculated for that inspection.
 - i. If entering an adjustment for an **Underpayment**, **ENTER** a negative
 (-) symbol in front of each entry in the **Adjustment** link.
 - ii. If entering an adjustment for an **Overpayment**, a negative (-) symbol is NOT required.
 - 2. For the second inspection:
 - a. **CLICK** the **Adjustment** link and **ENTER** the total eligible ADA amount.
 - A negative (-) symbol must be added in front of the entry in the Adjustment link.



- 3. CLICK Calculate.
- 4. CLICK Save.
- iv. REVIEW the Final Pending Eligible Amount to ensure it is correct;
- v. ENSURE the Do Not Add to Calculator box is NOT checked;
- vi. ENTER a Comment in the Notes field to explain your calculations;
- vii. CLICK Save; AND
- viii.CLICK Close.





Insurance Processing for HA and Personal Property

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I. OVERVIEW

This section describes information that every employee should read before addressing Insurance Processing for HA and Personal Property.

Purpose:

To review the eligibility of assistance for individuals and households who are uninsured or underinsured for disastercaused expenses and serious needs that are NOT covered by other sources.

What are Eligible Expenses?

Assistance with uninsured or underinsured disaster-caused Home Repair/Replacement, Temporary Housing, or Personal Property (PP) expenses, damage, or losses.

NOTE: Applicants are required to inform FEMA of all insurance (flood, homeowners, vehicle, mobile home, medical, burial, etc.) coverage that may be available to them to meet their disastercaused needs. Insured applicants must provide documentation that identifies their insurance settlements or benefits before FEMA will consider their eligibility for categories of assistance that may be covered by insurance.

Basic Documentation or Verification Needed:

Insurance settlement, denial letter, or proof of lack of insurance coverage.

Other Items to Note:

- Assistance eligibility is based on lack of adequate insurance coverage to address damages to a primary residence whose habitability was affected by the disaster.
- Insurance CANNOT be purchased for **Uninsurable** items such as wells, septic systems, and access routes (roads/bridges). Assistance for these items are processed regardless of the type of disaster-caused damage or the applicant's insurance coverage
 - Applicants who report flood damage to Real Property (RP) or PP during Registration Intake are always issued for inspection. These applicants shall NOT be required to submit a flood insurance denial or settlement letter before being inspected.
 - On appeal, if an applicant reports they have damages to Uninsurable items, an Appeal Inspection can be requested.
- A Special Handling Query will stop cases that return from inspection with flood damaged insurable items and the applicant is identified as being non-compliant with



the National Flood Insurance Program (NFIP). Refer to the Special Handling Queries SOP and the Flood Zones and Other Protected Areas SOP for additional Information.

■ The IA Training and Development Section has developed a guide that includes stepby-step instructions and reminders about navigating and using the tools in Web NEMIS. For additional information, refer to the Web NEMIS Initial Assistance Reference Guide.



II. IMPORTANT INFORMATION

This section describes information every employee <u>must</u> read **before processing** Insurance Processing for HA and Personal Property.



Prior to Processing:

- For cases locked or under Program Management Section (PMS) or NCT review:
 - DO NOT process the Workpacket (WP) if the file contains indications of being Under Review and/or locked from further processing.
 - SEND an email for review to the IHP Helpdesk.
 - INCLUDE the following on the email:
 - **Subject Line:** DR #, Reg #, and a subject that includes 'Under Review'.
 - **Body:** A description of the request and list of processing actions pending.
- Prior to reviewing or discussing Assistance, VERIFY the Other Needs Assistance (ONA) Option selection.
 - FEMA staff are authorized to process and discuss ONA in FEMA Option disasters.
 - In Joint Option disasters, only the state, territorial, or tribal government (STT) is authorized to process and discuss ONA eligibility. Refer to <u>Section III.E: Joint</u> Option Disaster Information.
 - Helpline Staff: Refer to the <u>Helpline NPSC Caller Services Reference Guide</u> for additional information.
- For ONA questions in Joint Option disasters, **PROVIDE** the applicant the STT ONA Helpline number which is listed on the NEMIS **Disaster Info (F8)** link or found in the **Summary Information** box located on the online **Disaster Specific** page.
- Sequence of Delivery
 - Housing Assistance (HA)



- Temporary Housing Assistance, if eligible; AND
- Home Repair Assistance or Home Replacement Assistance.
- Other Needs Assistance (ONA)
 - Funeral Assistance, if there is a pending funeral review;
 - SPLIT/ROUTE the Funeral pending (PND) line to the FEMA or State
 Funeral queue for processing by designated staff. Refer to the <u>Funeral</u>
 Assistance SOP for additional information.
 - When moving to the next eligible award in the sequence, if necessary,
 ADJUST the eligible award by one full funeral maximum amount to ensure funds are available for funeral expenses.
 - DO NOT hold/deduct funds when processing Americans with Disabilities Act (ADA) item awards.
 - DO NOT delay processing other eligible funds to await a funeral decision.
 - PP Assistance; AND
 - All other categories, if funds are available under their respective maximum amount of assistance.
- Individuals and Households Program (IHP) Maximum (system limit only):
 - In an effort to minimize errors, the system will generate a popup if the total combined payment exceeds \$100,000.
 - Total combined payments include (in any combination)
 - HA
 - ONA
 - ADA related line items
 - Temporary Housing and ADA related line items are NOT counted toward the financial HA and ONA maximums, so in rare instances an applicant's total award may exceed \$100,000.
 - If this happens, PLACE the case on Hold Program Review.
 - EMAIL the IHP Helpdesk for assistance: fema-ihphelpdesk@fema.dhs.gov.



- INCLUDE the following on the email:
 - Subject Line: DR #, Reg #, and a subject that includes 'System Limit Exceeded'.
 - Body: A description of the request and list of processing actions pending.
- The Program Management Section will have to authorize this payment.

Lodging Expense Reimbursement and Rental Assistance

- Following the Sequence of Delivery, initial Rental Assistance is the first category reviewed for eligibility.
- Settlement/denial documents or verbal verification from the insurance company is required prior to processing Lodging Expense Reimbursement or Rental Assistance when Additional Living Expenses (ALE) or Loss of Use (LOU) coverage is available to the applicant.
 - An insurance declaration page showing a lack of ALE/LOU coverage is sufficient verification to pay initial Rental Assistance. A settlement or denial letter will NOT be required.
- Refer to the <u>Lodging Expense Reimbursement</u> SOP and the <u>Rental Assistance</u> SOP for additional information.

Condominium and Cooperatives

- **REVIEW** the master insurance policy for RP coverage and limitations when the damaged dwelling (DD) is identified as a Condominium (Condo) or Cooperative (Co-Op) housing unit.
- Refer to the Home Repair Assistance SOP for additional information.

Costal Barrier Reform Act (CBRA) Zones and Sanctioned Communities:

- REVIEW the Banner for CBRA (CBRA: Yes/No) and Sanctioned Community (SC: Yes/No) information prior to processing Home Repair Assistance, Home Replacement Assistance, or Personal Property Assistance.
- Refer to the Flood Zones and Other Protected Areas SOP for additional information.

National Flood Insurance Reform Act (NFIRA) Compliance:



- When flood damage is indicated, CLICK the NFIRA Maintenance Requirement link located on the Insurance Substantiation/Settlement frame of the Assistance screen to review for NFIRA Compliance (NFIRA Compliance: Yes/No) prior to processing Home Repair Assistance, Home Replacement Assistance, or Personal Property Assistance.
- Refer to the Flood Zones and Other Protected Areas SOP for additional information.

Flood Damage and Flood Mapping

- REVIEW the Banner for flood zone information (Fld Zn: O, A, V, W) when flood damage is recorded.
- **SUBMIT** specific case information to <u>FEMA-IHP-Flood-Mapping-Team</u> for assistance when:
 - Flood damage is recorded for insurable items and the flood zone information is blank (unmapped);
 - Flood damage is recorded for insurable items and there is a NFIRA maintenance requirement in a flood zone 0; OR
 - Flood damage is recorded for insurable items and there are conflicts between the flood zone and NFIRA database.
- Only applications with flood damage identified by the inspector are required to be flood mapped.
 - Applications without flood damage can be processed without being flood mapped.

Flood Insurance exception available under building/structure coverage

- When RP coverage is available for owners under a Flood Insurance policy, a Flood Insurance settlement may include PP items such as refrigerator, stove, and built-in appliances.
 - A verification of built-in appliance coverage is required even if a structure settlement is NOT provided by the applicant.



III. PROCESS

A. Eligibility Verifications

Applicants must meet the eligibility criteria for each category of assistance in order to receive that assistance. Refer to the <u>Processing Procedures Manual</u> (PPM) for additional information.

- 1. Eligible damages are NOT fully covered by insurance. **VERIFY** one of the following:
 - a. The applicant DOES NOT have insurance coverage for the cause of damage (COD) identified; OR
 - b. The applicant does have insurance coverage for the COD identified. Applicants with insurance coverage for the COD identified must verify one of the following:

NOTE: DO NOT use verbal verification of insurance settlement or denial from the applicant.

- The net insurance settlement for the structure and/or contents is less than the financial HA and/or ONA maximum award and less than the applicable <u>FEMA</u> <u>Verified Loss (FVL)</u>;
- The insurance policy had a mandatory pay-off requirement and the net settlement for the structure is less than the financial HA maximum award and the applicable FVL; OR
- iii. The applicant DOES NOT have ALE/LOU coverage for the COD identified, or the remaining ALE/LOU coverage is less than one month FMR for the county/parish/municipality where the damage occurred.
 - An insurance declaration page showing a lack of ALE/LOU coverage is sufficient verification to pay initial Rental Assistance. A settlement or denial letter will NOT be required.

B. Information Requests

- 1. Verifications Calls
 - Only the insurance company can provide verbal confirmation of the insurance settlement or denial.
 - i. Casework staff:

000161



- 1. If an insured applicant fails to provide an insurance settlement/denial letter or statement, and insurance information is available on file, **CALL** the insurance company to verbally obtain insurance settlement/denial information.
 - An insurance declaration page showing a lack of ALE/LOU coverage is sufficient verification to pay initial Rental Assistance. A settlement or denial letter will NOT be required.
- 2. If RP Flood Insurance coverage is available, **CONFIRM** with the insurance company that a claim was filed for RP losses and if the settlement includes PP appliance items such as refrigerator, stove and built-in appliances.
- 3. If the applicant DOES NOT receive a settlement for a peril(s) that is generally covered, **CONFIRM** with the insurance company that a claim was filed for that peril and **UPDATE** the **Insurance Substantiation/Settlement** frame on the **Assistance** screen with any information obtained.
- ii. Casework and Helpline staff:
 - 1. If an applicant attempts to provide verbal information from their insurance settlement/denial letter, **ADVISE** the applicant they must submit insurance documents before a determination can be made.
 - If an applicant verbally requests that an insurance type be removed from their file, ADVISE them to submit the request in writing. The request must be signed by the applicant, co-applicant or a third party authorized to appeal on the applicant's behalf.
 - If an applicant verbally requests that a new type of insurance be added to their NEMIS record, UPDATE the Insurance Policy frame on the Assistance screen at that time.
- b. Some situations can be resolved by performing a <u>courtesy call</u> to the insurance company.
 - i. Sample questions:
 - 1. Homeowners/Renters/Condo Insurance Company:
 - a. Has a claim been filed and have you reached a settlement or denial of coverage?
 - b. Was a disbursement made for recoverable depreciation?
 - c. Is there any available coverage for ALE or LOU?
 - i. If yes, have these funds been exhausted?



- 2. Mortgage company:
 - a. Was there a requirement to pay down the mortgage due to a mandatory pay-off?
 - i. If yes, what was the net amount provided to the applicant after the forced pay-off?
- 3. Flood Insurance Company:
 - a. Was there a structural settlement with built-in appliance coverage?
 - i. If yes, what built-in appliances were covered by the settlement?
- ii. If the call attempt is successful:
 - 1. **OBTAIN** required information from the insurance provider; AND
 - 2. **RECORD** the response(s) in NEMIS and **CONTINUE** processing.
- iii. If the call attempt is unsuccessful:
 - 1. **COMPLETE** a review of all other verification requirements and documents received.
 - If there is NOT an insurance settlement or denial letter on file, there is NO
 evidence an insurance claim was filed, and it has NOT been 12 months since
 the registration was completed; CALL the applicant, provide details of
 information required from the insurance provider, resolve any outstanding
 questions; and ROUTE to FEMA Complete.
 - 3. If there is an insurance settlement or denial letter on file, or it has been more than 12 months since the registration was completed; **PROCESS** Home Repair Assistance, Home Replacement Assistance, or Personal Property Assistance as **Ineligible Has Insurance** (**INI/INFI**) with the appropriate text insert.
- 2. Insurance request for consent
 - a. If the insurance company will NOT release information over the phone without consent from the applicant, CALL the applicant to explain the need to call the insurance company and give them consent for FEMA to obtain the needed information.



- PROCESS the initial INI/INFI determination with the Missing Insurance Settlement Approval or Denial Letter insert.
- b. If the initial **INI/INFI** determination was previously processed and there is information missing for processing:
 - GENERATE an Appeal Request Documentation (ADOC) letter to request the insurance settlement or denial; AND
 - 1. ADOC letter selections:
 - a. Missing Homeowners INS Settlement or Denial
 - b. Missing INS Letter Exhaustion of ALE/Loss of Use
 - ii. CALL the applicant to explain reason for the ADOC.

C. Processing Eligible Assistance

- 1. General processing information
 - a. **PROCESS** an eligibility determination for all **Uninsurable** items such as wells, septic systems, access routes (roads/bridges), etc., with or without insurance documentation in the file, regardless of the cause of damage or insurance policies held by the applicant.
 - b. An insured applicant will NOT be eligible for insured Personal Property Assistance, Home Repair Assistance, or Home Replacement Assistance unless an insurance settlement, denial letter, or verbal confirmation with the insurance company is provided to FEMA.

NOTE: An <u>insurance estimate</u> is NOT acceptable in place of an insurance settlement.

- Insurance information must be addressed when it is received.
 - i. The Insurance Substantiation/Settlement frame should be reviewed and updated as necessary when an insurance document is received or verbally verified with the insurance company and prior to processing any eligible or ineligible determinations.
- d. Staff should critically review insurance settlements or denial letters to ensure:
 - i. The insured property address matches the DD;

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- ii. The date of loss matches the incident period; AND
- iii. The denial is specific to the peril(s) generally covered by that insurance type, as well as the cause of damage to which the comparison is being made.
 - 1. For example: A Homeowners Insurance (HOI) denial for water damage should NOT be considered a denial from Flood Insurance
 - 2. If the applicant DOES NOT receive a settlement for a peril(s) that is generally covered, e.g. Wind COD with HOI coverage, **CONFIRM** with the insurance company that a claim was filed for that peril.
- e. If the settlement or denial is NOT in the file for any insured line items, **CALL** the insurance company to **VERIFY** if a claim was filed and, if so, to **VERIFY** the insurance determination.
- f. An applicant with insurance for a covered peril will be ineligible for assistance from FEMA for insured RP items if they failed to file a claim within the allotted timeframe established by their insurance company (insurance contract, terms, and/or conditions).
- g. An insured applicant may be eligible for FEMA assistance when any adjusted net insurance settlement for RP/PP loss is less than the financial HA and/or ONA maximum award.
 - i. The financial HA and ONA maximum award changes annually on October 1 and should be verified prior to processing an award.
- The net insurance settlement is the amount the applicant received from the insurance company for Temporary Housing (ALE/LOU), RP (structure), or PP (contents).
 - i. Deductibles are NOT included in a net insurance settlement.
 - ii. The RP adjusted net insurance settlement may include recoverable depreciation funds if disbursed to the applicant at the time of review.
 - 1. Refer to <u>Section IV</u>, <u>Recoverable Depreciation Calculation</u> for additional information.
 - iii. If an itemized insurance settlement is available in the applicant's file, **DEDUCT** PP, outbuildings, other structures, e.g. sheds, fences, etc.; or other items NOT covered under Home Repair Assistance or Home Replacement Assistance (traditional NEMIS line items). These items must be deducted from the RP net settlement.
 - 1. PP net settlements will be calculated similarly to RP net settlements.



- a. If an itemized insurance settlement is available in the applicant's file, DEDUCT jewelry or other items NOT covered under PP Assistance (traditional NEMIS line items). These items must be deducted from the PP/content net settlement.
- b. In instances where an applicant receives insurance proceeds for multiple items covered under PP Assistance, such as five televisions, NO additional adjustments/deductions are made. The entire amount will be considered as part of the PP net settlement.
- iv. The adjusted net settlement amount for each type of insurance policy must be compared to the financial HA and/or ONA maximum award separately in order to determine if the applicant is eligible for the unmet need for that specific covered peril.
- v. If the adjusted net insurance settlement amount for a covered peril is greater than or equal to the financial HA and/or ONA maximum award, the applicant is NOT eligible for assistance for the covered peril.
 - When the applicant is determined to be ineligible because the adjusted net insurance settlement for all insured perils is greater than the financial HA and/or ONA maximum award, USE the INI/INFI letter with the Insurance Settlement exceeds FEMA Eligible Damage (FVL or Max) insert.
 - 2. If the applicant is determined to be eligible for any **Uninsurable** items, **USE** the EHR eligibility determination.
- vi. If any adjusted net settlement is less than the financial HA or ONA maximum award, an inspection must be requested, if NOT previously completed.
- If any adjusted net settlement is less than the financial HA and/or ONA maximum award, a comparison of like peril FVL to the adjusted net settlement for like insurance coverage will be performed based on the information recorded during the inspection.
- j. An itemized list of each item paid by the insurance company is NOT required and should NOT be requested.
 - i. **IDENTIFY** the types of insurance the applicant has and the cause of damage to RP/PP. For example:
 - HOI settlements will be compared to the RP/PP FVL for insurable RP/PP items recorded for Wind-driven Rain (WDR) and perils traditionally covered by HOI.

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- Flood Insurance settlements will be compared to the RP/PP FVL for insurable RP/PP items damaged by flood and perils traditionally covered by Flood Insurance.
- k. The applicant will be reviewed for the unmet need up to the established program limit NOT to exceed the FVL.
 - i. When the applicant is determined to be eligible because the adjusted net insurance settlement is less than the FVL of like insured RP/PP items, **USE** the **EHR/EHRZ**, **ERPL/ERPLZ**, or **EPP/EPPZ** eligibility determination. This would also include payment for any **Uninsurable** or **Not Insured** items.
 - ii. When the applicant is determined to be ineligible because the adjusted net insurance settlement for all insured perils is greater than the FVL, USE the INI/INFI letter with the Insurance Settlement exceeds FEMA Eligible Damage (FVL or Max) insert.
- FEMA will NOT request or require an insurance settlement if the COD the inspector recorded in the line items is NOT covered by any insurances the applicant has reported.
 - If an itemized breakdown is voluntarily submitted with a different COD than what the FEMA Inspector found, they must be reviewed for possible duplication of benefits (DOB) with insurance.
 - ii. When items are found on an insurance settlement with a different COD than what the FEMA Inspector found, they must be reviewed for possible DOB with insurance.
 - If the applicant is NOT underinsured and there are clearly duplicated items in the settlement such as water heater, furnace, or other singular RP items, DEDUCT those line item amounts from the award.
 - a. This DOES NOT apply to paint, drywall, flooring, or other items that CANNOT be considered an exact duplicate.

2. Recoverable depreciation

- a. Recoverable depreciation is an amount that may be paid to the homeowner by the insurance company after repairs have been made. Only deduct this amount if the file includes clear documentation or a verifiable contact that the applicant received these funds.
 - i. If recoverable depreciation has been disbursed at the time the eligibility is determined, it will be included in the adjusted net insurance settlement amount





and compared to the financial HA maximum award and the FVL prior to determining the Home Repair Assistance award.

- 1. **CALL** the insurance company to **VERIFY** if recoverable depreciation was disbursed to the applicant.
 - a. Once verified, recoverable depreciation will be added to the adjusted net insurance settlement total prior to an IHP determination being made for Home Repair Assistance.
- a. Refer to <u>Section IV</u>, <u>Recoverable Depreciation Calculation</u> for additional information.
- 3. Mandatory pay-offs and lender/forced placed policies
 - a. To determine if the insurance policy had a mandatory pay-off requirement, including force-placed policies;
 - i. **CALL** the insurance company to **CONFIRM** the amount of the net settlement and how much was paid to the mortgage company and the applicant; AND
 - ii. **CALL** the mortgage company to verify if the applicant was required to pay down the mortgage, e.g. force-placed, lender-placed, or other conditions such as a property lien; or had the option to choose between paying down the mortgage or keeping the net settlement. One call attempt is required for each verification.
 - 1. If the applicant had to pay down the mortgage and received NO benefit, the net settlement is zero.
 - 2. If the applicant had to pay down the mortgage and received some benefit, the net settlement is the amount received after the mandatory pay-off.
 - If the applicant had the option to pay down the mortgage or keep the settlement, the net settlement is the amount paid to the mortgage company plus the amount the applicant received.
 - iii. Refer to <u>B.1. Verification Calls</u> and <u>Force-Placed or Lender Placed Insurance Policy FAQ</u> for additional information.
- 4. Mobile Home Insurance
 - a. An applicant with Mobile Home Insurance will be ineligible for insured RP/PP line items until the applicant files a claim with their insurance company and demonstrates an unmet need by providing an insurance settlement or denial letter.



- For DR-4563-AL and forward, applicants who stated they have applicable insurance coverage at the time of registration, will receive a No Decision – Insured letter, INS.
- Applicants accessing their online DAC account will view a "Not Approved" status.
- i. These applicants will have 60 days from the date of letter to provide copies of an insurance settlement approval or denial letter.
- ii. Applicants who DO NOT provide copies of insurance settlement or denial within 60 days of INS letter, will receive IINR – Ineligible Insured No Response. Once applicants receive the IINR, they must include an appeal letter with any submission of insurance documents.
- Although a standard Mobile Home Insurance policy may NOT cover flood damage, confirmation of flood insurance coverage is required.
 - The declaration page will display all covered perils. If the applicant sends information that shows flood is NOT covered under their insurance policy, the applicant can then be processed for all eligible disaster-caused flood damages.
 - ii. However, if the applicant also incurred Wind Driven Rain damage or other damage normally covered by Mobile Home Insurance, then the applicant must submit the settlement or denial from the insurance company so an accurate amount of FEMA assistance can be determined.
- 5. Case processing with NO previous inspection
 - Cases are generally processed in FEMA Manual Determination Insurance subqueue.
 - b. Insured applicants will receive an inspection when any adjusted net insurance settlement for RP loss is less than the financial HA maximum award.
 - i. **IDENTIFY** the type(s) of insurance held by the applicant.
 - ii. **IDENTIFY** the cause(s) of damage to the RP/PP.
 - iii. **COMPARE** the adjusted net insurance settlement for each type of insurance to the financial HA and/or ONA maximum award.
 - iv. If the adjusted net insurance settlement for any covered peril is less than the financial HA and/or ONA maximum award, REQUEST an inspection, if NOT previously issued.



- c. If each of the adjusted net insurance settlements for covered perils is greater or equal to the financial HA and/or ONA maximum award, NO inspection would be requested.
 - Exception: An inspection is requested when it is identified that damages occurred to Uninsurable items. Assistance for uninsurable items is processed regardless of the applicant's insurance coverage.
- d. For applicants with HOI, Flood, or a combination of the two types of insurance:

Insurance Types	Adjusted Net Insurance Settlement	Fiscal Year Maximum (FY21)	Request Inspection
HOI only	 Structure HOI settlement for Tornado/Wind = \$55,000.00 Content HOI settlement for Tornado/Wind = \$10,000.00 	\$36,000.00	Yes, if ONA Referred, e.g. SBA = FIT or when referred to ONA by SBA.
HOI only	 Structure HOI settlement for Tornado/Wind = \$25,000.00 Content HOI settlement for Tornado/Wind = \$10,000.00 	\$36,000.00	Yes
HOI only	 Structure HOI settlement for Tornado/Wind = \$45,000.00 Content HOI settlement for Tornado/Wind = \$36,000.00 	\$36,000.00	No, ineligible for HA and ONA (insurance over the financial HA and ONA maximum in both categories).
Flood only	■ Flood = Any Amount	\$36 <u>,</u> 000.00	Yes, the inspection will verify disaster caused damage to the structure, habitability, contents, and/or potential losses to Uninsurable items damaged by flood.
HOI and Flood	■ Structure HOI for Hail/Rain/Wind Driven Rain = \$36,000.00 ■ Structure Flood = \$24,000.00 ■ Content Flood = \$9,300.00	\$36 <u>,</u> 000.00	Yes, the inspection will verify disaster caused damages to the structure, habitability, contents and/or potential losses to UI items damaged by flood.

Table 1: Requests for Inspection

- e. To request an initial inspection:
 - i. Refer to Inspection Requests and Comparisons SOP.
- 6. Case processing with inspection completed
 - Cases are generally processed in FEMA Manual Determination Insurance subqueue.



- REVIEW all submitted insurance documents and conduct a comparison of FVL against covered perils and category types (HA vs ONA).
- c. **REVIEW** all FVL reported by the inspector.
- d. COMPARE the total net settlement(s) (adjusted if necessary) of covered perils to the corresponding FVL cause of damage. For example, COMPARE an HOI settlement against a wind damage FVL.
 - The applicant has an unmet need if the losses are NOT insured (no insurance to cover the damage type), under-insured (FVL is greater than the net settlement) for any cause of damage, or if there is a forced payoff requirement.
 - ii. After completing the insurance comparison, **Insured** items and **Not Insured** items may be processed for assistance.
- 7. Housing and/or Personal Property awards
 - a. If an applicant meets the verification requirements listed under <u>Eligibility</u> Verifications;
 - i. UPDATE flood-damaged insurable RP line items from Insured to Not Insured when paying EHRZ flood damages in Flood Zone A, V or W; and UPDATE flood-damaged PP line items from Insured Yes to Insured No when paying EPPZ flood damages in Flood Zone A, V or W.
 - ii. PROCESS the Eligible Assistance (EHR/EHRZ; ERPL/ERPLZ or EPP/EPPZ) award(s):
 - 1. Refer to Home Repair Basic Processing Steps section of the <u>Web NEMIS</u> Initial Assistance Reference Guide for additional information.
 - 2. Refer to the Appendix for information on using the **Eligibility Calculators**.
 - iii. **ADD** a **Comment** explaining the eligibility, including information about the verification items, AND
 - iv. **ROUTE** to **FEMA Approval NON-DRM** unless instructed to do otherwise by Preshift, Supervisor/Point of Contact (POC), or other authorized source.
 - 1. **ROUTE** to **FEMA Approval NON-DRM** when there is a combination of eligible and ineligible determinations.

D. Processing Ineligible Decisions



1. INS or INSFI Status

- a. **INS** and **INSFI** are typically auto-determination decisions created when the applicant has insurance coverage for the perils recorded during Registration Intake or during the inspection process. These determinations are generally made prior to any comparison with actual insurance settlement or denial documentation.
 - i. These determinations may require manual entry when:
 - The applicant contacts Helpline and changes Home Damages or PP Damages from No or Unknown to Yes;
 - 2. The applicant has insurance coverage for the perils listed as the COD; AND
 - Flood is NOT listed as a COD.
- b. For RP and ONA assistance categories, applicants initially determined INS or INSFI have 12 months from the registration date to provide an insurance settlement or denial letter for review of the specific type of insurance, e.g. Homeowners, Flood, etc. For Temporary Housing, applicants have the entire period of assistance (18 months) to submit their insurance documentation for review.
 - For DR-4563-AL and forward, applicants who stated they have applicable insurance coverage at the time of registration, will receive a No Decision – Insured letter, INS.
 - Applicants accessing their online DAC account will view a "Not Approved" status.
 - 2. These applicants will have 60 days from the date of letter to provide copies of an insurance settlement approval or denial letter.
 - 3. Applicants who DO NOT provide copies of insurance settlement or denial within the 60 days of **INS** letter, will receive **IINR Ineligible Insured No Response**. Once applicants receive the **IINR**, they must include an appeal letter with any submission of insurance documents.
 - ii. Once the applicant has submitted insurance information for RP or ONA losses, and received a decision (**INI** or **INFI**), they have 60 days from that decision date to submit an additional appeal.
- c. When reviewing a previously determined INS/INSFI insurance case in FEMA Manual Determination and the applicant has NOT submitted the necessary insurance documents:



- If the submitted documents DO NOT include a settlement or denial letter, there
 is NO evidence an insurance claim was filed, and it has NOT been 12 months
 since the registration was completed:
 - CALL the applicant and EXPLAIN the need to file an insurance claim and submit the insurance settlement or denial letter for review. EXPLAIN they have 12 months from the registration date to submit the requested information. One call attempt is required; AND
 - 2. ROUTE to FEMA Complete.
- ii. If the submitted documents do include a settlement or denial letter, but they DO NOT include enough information to determine eligibility:
 - USE the INI/INFI determination with the Missing Insurance Settlement Approval or Denial Letter insert;
 - If the applicant appeals the initial INI/INFI decision, USE the Appeal A-INI/A-INFI determination;
 - GENERATE the INI/INFI or A-INI/A-INFI Eligibility letter (DO NOT send to mail queue); AND
 - 4. ROUTE to FEMA Ineligible.
- 2. Inspection and ineligible processing sequence

Manual Review	Non-Flood decision/status	Flood decision	Inspection Request
Post Registration	INS - Applicant has damage for insured peril.	N/A	REQUEST an initial inspection if:
a. Updating the Non-Referral status. AND b. IDV_PASS and OCCV_PASS			The applicant has damages from flood and they have Flood Insurance; OR
_			b. The applicant has both HOI-covered damage and Flood Insurance-covered damage and has coverage from both insurance types
Initial review – No inspection	HA: INI ONA: INI	HA: INFI ONA: INI	REQUEST an initial inspection if:
a. First document(s) submitted.	HA - Letter Insert options:	HA - Letter Insert options:	The adjusted net insurance settlement





Manual Barrian	Non Floor	Classical desirates	Inanastian Daniel
Manual Review	Non-Flood decision/status	Flood decision	Inspection Request
	a. Insurance Settlement exceeds FEMA Eligible Damage. b. Missing Insurance Settlement Approval or Denial Letter. c. Insurance Covers Living Expenses.	Insurance Settlement exceeds FEMA Eligible Damage. Missing Insurance Settlement Approval or Denial Letter.	for any covered peril in HA or ONA is less than the financial HA and/or ONA maximum award; b. The applicant has damages from flood, and has HOI and/or Flood Insurance; c. The applicant submits a written statement indicating they have NO insurance whatsoever; OR d. Uninsurable items
Initial various Poot	LIA. INII	LIA. INFI	are identified.
Initial review - Post Inspection	HA: INI ONA: INI	HA: INFI ONA: INI	N/A
Documents received, or verbal verification attempt completed.	 HA - Letter insert options: a. Insurance Settlement exceeds FEMA Eligible Damage. b. Missing Insurance Settlement Approval or Denial Letter. c. Insurance Covers Living Expenses. 	 HA - Letter insert options: a. Insurance Settlement exceeds FEMA Eligible Damage. b. Missing Insurance Settlement Approval or Denial Letter. 	
Appeal review	HA: A-INI ONA: A-INI	HA: A-INFI ONA: A-INI	N/A
After the initial INI or INFI decision.	HA - Letter Insert options: a. Insurance Settlement	HA - Letter Insert options:	
	exceeds FEMA Eligible Damage	Settlement exceeds FEMA Eligible Damage	
	b. Missing Insurance Settlement Approval or Denial Letter.	b. Missing Insurance Settlement Approval or Denial Letter.	
	C. Insurance Covers Living Expenses	Lotto!,	

Table 2: Inspection and Ineligible Processing Sequence



- All standard in eligible insurance determinations can be used when processing requests with insurance coverage. Standard ineligible determinations and reasons for denial include:
 - a. Ineligible Insured (INS) or Ineligible Has Flood Insurance (INSFI):
 - Applicants who have insurance which covers the reported cause of damage will receive an INS or INSFI status until the required insurance documentation is received and reviewed.
 - For DR-4563-AL and forward, Applicants who stated they have applicable insurance coverage at the time of registration, will receive a No Decision – Insured letter, INS.
 - 1. Applicants accessing their online DAC account will view a "Not Approved" status.
 - iii. These applicants will have 60 days from the date of letter to provide copies of an insurance settlement approval or denial letter.
 - iv. Applicants who DO NOT provide copies of insurance settlement or denial within the 60 days of **INS** letter, will receive **IINR Ineligible Insured No Response**. Once applicants receive the **IINR**, they must include an appeal letter with any submission of insurance documents.
 - b. Ineligible Has Flood Insurance (INFI):
 - i. Insurance Settlement exceeds FEMA Eligible Damage (FVL or Max); OR
 - ii. Missing Insurance Settlement Approval or Denial Letter.
 - c. Ineligible Has Insurance (INI):
 - i. Insurance Settlement exceeds FEMA Eligible Damage (FVL or Max);
 - ii. Missing Insurance Settlement Approval or Denial Letter; OR
 - iii. Insurance Covers Living Expenses.
 - When unmet needs for Temporary Housing is identified, e.g. ALE/LOU is exhausted; applicants can submit their request for Temporary Housing assistance with the required documents any time during the eligible period of assistance (18 months), but they must initiate the request for Temporary Housing assistance before the financial closure of the disaster.



- 2. Temporary Housing assistance DOES NOT have a financial maximum. Eligibility is only limited by the eligible period of assistance (18 months) unless Disaster Specific Operating Procedures exist.
- d. Ineligible Insurance Coverage (IINS) generally used in ONA related determinations:
 - i. The applicant received assistance from another source;
 - ii. The applicant directly received insurance funds equal to or in excess of the disaster-caused expense; OR
 - iii. The applicant failed to file an insurance claim within the allotted timeframe established by their insurance company (insurance contract, terms, and/or conditions).
- 4. To process the ineligible determination:
 - a. Refer to Home Repair Basic Processing Steps section of the <u>Web NEMIS Initial</u>
 Assistance Reference Guide for additional information.
 - b. ADD a Comment:
 - EXPLAIN the eligibility, including information about the reason(s) for denial, AND
 - c. **ROUTE** to **FEMA Ineligible** unless instructed to do otherwise by Preshift, Supervisor/POC, or other authorized source.
 - i. **ROUTE** to **FEMA Approval NON-DRM** when there is a combination of eligible and ineligible determinations.

E. Joint Option Disaster Information (ONA Only)

This category is NOT applicable to this guidance. (Alternative language below).

- 1. If processing a **Joint Option** Disaster:
 - a. ONA categories are only processed by the STT.
 - b. FEMA staff is authorized to process Housing Assistance (HA) categories.
- 2. If incoming mail generates a WP to a FEMA processing queue:



- a. **REVIEW/PROCESS** any outstanding issues within HA categories. Refer to the Appendix for information on using the **Eligibility Calculators**.
 - If an additional WP is available in a state processing queue or subqueue such as State Manual, State Appeal, or State Supervisor Review, NO further action for ONA is required.
- 3. If an additional WP is NOT available in an STT queue AND
 - a. There are NO HA categories to address:
 - i. ROUTE the existing WP to the State Manual Determination queue.
 - b. There are HA categories to address:
 - On the Confirmation screen, SELECT the appropriate Routing location for all HA categories;
 - ii. SELECT State Manual Determination for all ONA categories; AND
 - iii. CLICK Submit.

F. Appeals

- 1. Once insurance information or documents are reviewed, and an initial eligible (EHR/ERPL/EPP) or ineligible (INI/INFI) determination has been made, applicants have 60 days from the eligible/ineligible determination to submit an appeal for reconsideration or additional assistance.
 - a. Refer to the Appeal Processing SOP for more information.
- Applicants who DO NOT provide their insurance documentation within 60 days of the INS letter will automatically receive the IINR letter. Once the applicant receives the IINR, they must include an appeal letter with any submission of insurance documents. The appeal letter and insurance documents must be submitted within 12 months of registration.
 - b. Refer to the <u>Appeal Processing</u> SOP for more information

G. Exceptions

There may be unique scenarios NOT specifically identified within this SOP that may require additional assistance.





- 1. If unable to determine eligibility using available SOPs, DSOPs, or other posted information:
 - a. **CALL** the IHP Helpdesk at (b) (6) or the applicable extension number; or **EMAIL** the appropriate Supervisor or POC.
 - If after review by the IHP Helpdesk Specialist or Supervisor/POC it is determined additional clarification is required, the IHP Helpdesk Specialist or Supervisor/POC will:
 - 1. **EMAIL** a request for clarification to the appropriate team via the Helpdesk (FEMA-IHPHelpdesk@fema.dhs.gov).



IV. EXAMPLES AND FAQS

Insurance Matrix

1. The insurance matrix and associated eligibility charts in the following section contain examples of eligibility decisions for applicants who have insurance.

INSURANCE TYPE	PROPERTY COVERED	PROPERTY NOT COVERED	PERILS COVERED	PERILS NOT COVERED
Homeowners	All RP, including separate structures; removal of debris deposited by covered peril; PP, and ALE/LOU for covered perils.	Seawalls; retaining walls; washouts (access)	Wind; hail; lightning; falling objects including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; power surge; explosion; not or civil disturbance.	Surface waters or flood; rain through doors, windows, or bad roof; seepage; landslides; mudslides; earthquake; sewer backup (SBU). Sewer backup is usually covered in an endorsement to the policy.
Renters (Contents Only)	All PP, including PP away from premises and ALE/LOU for covered perils.	RP, seawalls; retaining walls; washouts (access)	Wind; hail; lightning; falling objects including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; power surge; explosion; riot or civil disturbance.	Surface waters or flood; rain through doors, windows, or bad roof; seepage; landslides; mudslides; earthquake; sewer backup (SBU). Sewer backup is usually covered in an endorsement to the policy.
Mobile Home	Mobile home, including separate structures; removal of debris deposited by covered peril; cost of emergency repairs or removal to protect the mobile home; ALE/LOU for covered perils; and all PP, including PP away from premises.	Seawalls; retaining walls; washouts (access)	Wind; hail; lightning; falling objects including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; power surge; explosion; riot or civil disturbance. Flood may or may NOT be covered depending on the contract.	Sewer backup; leakage from rain, snow, or sleet; freezing or electrical failure, mudslide, earthquake; depending on the contract, flood may or may NOT be covered. Electrical failure DOES NOT pertain to power surges, but only to situations where electrical service stops and there is NO damage to the home.



INSURANCE TYPE	PROPERTY COVERED	PROPERTY NOT COVERED	PERILS COVERED	PERILS NOT COVERED
Condominium	Unit: Structural elements NOT shared by other tenants or owned by the association, generally from the sheetrock in, including sheetrock, paneling, wall covering; ALE/LOU for covered perils; all PP, including PP away from premises. Master: Structural elements shared by other tenants or owned by the association, generally from the wall studs out.	Seawalls; retaining walls; washouts (access)	Wind; hail; lightning; falling objects including trees; freezing of plumbing; weight of ice, snow, or sleet; fire; smoke; volcanic eruption; power surge explosion; riot or civil disturbance.	Surface waters or flood; rain through doors, windows, or bad roof; landslides; mudslides; earthquake; sewer backup; leakage from rain, snow, or sleet; freezing or electrical failure.
Flood	Owners Only: all RP from the first floor up; RP in basement below ground level necessary for habitability, e.g. structural wall, furnace, water heater, main panel; separate structures such as storage buildings; cost of preventing flood damage to home; removal of debris deposited by covered peril. Homeowners and Renters: property in basement necessary for habitability, e.g. washer and dryer, all PP in dwelling and separate enclosed structures (see property NOT covered); PP stored away from premises.	RP: Water wells; well pumps; oil or propane tanks; septic tanks; seawalls; retaining walls; washouts (access); dikes. ALE/LOU PP: property stored in basements below grade level as identified by the individual policy.	General condition of flooding, e.g. overflow of inland or tidal waters; the unusual and rapid run-off or accumulation of surface waters from any source; mudflow/mudslide; sewer backup caused by flood; seepage caused by flood, e.g. ground saturation or seeping under doors from rising water.	Anything other than perils listed, e.g. WDR; landslide; sewer backup when NO general flood exists; seepage NOT caused by flood, e.g. melting snow or WDR blowing water under doors.
Earthquake, Sewer Backup, and other riders	Any property covered by the policy rider.	Any property excluded from coverage under the policy the rider is attached to.	Only the peril(s) specified on the rider.	All perils except those specified by the rider.

Table 3: Insurance Matrix



- 2. Insurance eligibility charts for Rental Assistance, Home Repair Assistance, and Personal Property Assistance.
 - a. **USE** the charts in this section to assist in identifying the appropriate eligibility codes for Rental Assistance, Personal Property Assistance, and Home Repair Assistance in cases where the applicant was inspected and received a settlement for coverage that is greater than the FVL and/or for ALE/LOU coverage that is greater than 1 month Fair Market Rent (FMR).
 - i. Step 1: **DETERMINE** the type of dwelling: Single-family or mobile home.
 - ii. Step 2: **DETERMINE** the cause of damage or multiple causes of damage.
 - iii. Step 3: Choose the chart that best describes the case: One COD, Multiple CODs, or Mobile Home. Within the chart, locate the row that contains the criteria that best matches your case. Criteria includes:
 - Type of Line Items
 - 2. Whether Habitability Repairs are Required (HRR = YES/NO)
 - 3. Whether the applicant will relocate while repairs are being made or as a result of damage (as indicated by MOVED = YES/NO)
 - 4. Insurance Types
 - iv. The criteria are found in the first four boxes of the row. The last column will give the Eligibility Determination.
 - v. Example:

Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Eligibility Code	HR Eligibility Code	PP Eligibility Code
Applicant has flood damage with or without uninsurable items.	No.	No.	No	Homeowners	IID (Ineligible – Home is Safe to Occupy)	IID (Ineligible – Home is Safe to Occupy)	IID (Ineligible – Minimal or No Repairs Required)

Table 4: RA, HR, PP Eligibility Chart

- b. In all cases where COD = Flood, and the Flood Zone is A, V, or W, USE EHRZ Eligible Home Repair, Flood Insurance Required and/or EPPZ – Eligible Personal Property, Flood Insurance Required.
- c. Agents must review insurance documents on file or receive verbal verification from the insurance company of settlement/denial/lack of coverage before processing determinations for insured damages.



- i. Applicants initially determined **INS** or **INSFI** have 12 months from the registration date to provide an insurance settlement or denial for review of RP and PP assistance for the specific type of insurance, e.g. Homeowners, Flood, etc. For Temporary Housing, applicants will have the entire period of assistance (18 months) to submit their insurance documentation for review.
 - 1. For **DR-4563-AL** and forward, applicants who DO NOT provide copies of insurance settlement or denial within the 60 days of INS letter, will receive IINR - Ineligible Insured No Response. Once applicants receive the **IINR**, they must include an appeal letter with any submission of insurance documents.
- For current disasters:
 - 1. **USE** the **INI/INFI** determination with the applicable insert for the situation. After the applicant appeals the decision, USE the Appeal A-INI/A-INFI determination.
- d. **REVIEW** the Rental Assistance SOP before processing Temporary Housing Assistance.

NOTE: PROCESS Uninsurable items as eligible, regardless of insurance coverage or COD.



COD = Flood							
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Cod
Flood Damage Only	No.	No.	No	None or Any Type	IID	IID	IID
Flood Damage Only	Yes	Yes	No.	None, Homeowners w/ or w/o SBU	INR	EHR/EHRZ	EPP/EPPZ
Flood Damage Only	Yes	Yes	Yes.	None, Homeowners w/ or w/o SBU	ER	EHR/EHRZ	EPP/EPPZ
Flood Damage Only	Yes	Yes	No.	Flood	INR	INFI	INI
Flood Damage Only	Yes	Yes	Yes	Flood	E <u>.</u> R	INFI	INI
Flood Damage Only	Yes	Yes	No	Homeowners and Flood	INR	INFI	INI
Flood Damage Only	Yes	Yes	Yes	Homeowners and Flood	ER	INFL	INI
COD = Hail, Rain, WD	R, Ice, Snow,	Power Sur	e, or Lightn	ing			200 M
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Cod
NDR Damage Only	No	N _O	No.	None or Any Type	IID	IID	IID
NDR Damage Only	Yes	Yes	No	None or Flood	INR	EHR	EPP.
WDR Damage Only	Yes	Yes	Yes	None or Flood	E.R	EHR	EPP
WDR Damage Only	Yes	Yes	No.	Homeowners w/ or w/o SBU	INR and INI	INI	INI
WDR Damage Only	Yes	Yes	Yes.	Homeowners w/ or w/o SBU	INI	INI	INI
WDR Damage Only	Yes	Yes	Yes.	Homeowners w/or w/o SBU and Flood	ļΝΙ	İNI	INI
COD = SBU or Seepag	ge						
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Cod
SBU Damage Only	No	No	No	None or Any Type	IID	IID	IID
SBU Damage Only	Yes	Yes	No.	None or Homeowners w/o SBU	INR	EHR	EPP.
SBU Damage Only	Yes	Yes	Yes	None or Homeowners w/o SBU	ER	EHR	EPP.
SBU Damage Only	Yes	Yes	No.	Homeowners w/ SBU	INR and INI	ļΝI	ΙΝΙ
SBU Damage Only	Yes	Yes	Yes	Homeowners w/ SBU	INI	INI	INI
SBU Damage Only	Yes	Yes	No	Flood	INR	INFL	INI
SBU Damage Only	Yes	Yes	Yes	Flood	ER	INFI	INI
SBU Damage Only	Yes	Yes	No.	HOI w/o SBU and Flood	INR	INFI	INI



SPII Domogo Only	Yes	Yes	Yes	HOI w/o SBU and	ER	INFI	INI
SBU Damage Only				Flood			
COD = Earthquake (EC	2)						
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
EQ Damage Only	No	No	No.	None or Any Type	IID _a	IID	IID
EO Domogo Only	Yes	Yes	No	None or	INR	E.HR	EPP
EQ Damage Only				Homeowners w/o EQ			
EO Damaga Only	Yes	Yes	Yes	None or	ER	EHR	EPP
EQ Damage Only				Homeowners w/o EQ			
EQ Damage Only	Yes	Yes	No	Homeowners w/ EQ	INR or INI	INI	INI
EQ Damage Only	Yes	Yes	Yes	Homeowners w/ EQ	INI	INI	INI

Scenarios assume that Homeowners Insurance covers ALE/LOU.

Remember to process Uninsurable items as eligible regardless of insurance types or COD.

FEMA will NOT request an insurance settlement if the recorded COD is NOT a covered peril within the applicant's insurance coverage.

Table 5: Initial Determinations for Inspected Applicants with 1 Cause of Damage

COD = Flood, Sewer Ba	ackup, and V	Vind Damag	e				
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
Flood, SBU, and Wind Damage	No	No	No	None or Any Type	IID	IID.	IID.
Flood, SBU, and Wind Damage	Yes	Yes	No	None	INR	EHR/EHRZ	EPP/EPPZ
Flood, SBU, and Wind Damage	Yes	Yes	Yes	None	E _, R	EHR/EHRZ	EPP/EPPZ
Flood, SBU, and Wind Damage	Yes	Yes	No	Homeowners w/o SBU	INR and INI	EHR/EHRZ (Flood & SBU items only)	EPP/EPPZ (Flood & SBU items only)
Flood, SBU, and Wind Damage	Yes	Yes	Yes	Homeowners w/o SBU	INI	EHR/EHRZ (Flood & SBU items only)	EPP/EPPZ (Flood & SBU items only)
Flood, SBU, and Wind Damage	Yes	Yes	No.	Homeowners w/ SBU	INR and INI	EHR/EHRZ (Flood items only)	EPP/EPPZ (Flood items only)
Flood, SBU, and Wind Damage	Yes	Yes	Yes	Homeowners w/ SBU	INI	EHR/EHRZ (Flood items only)	EPP/EPPZ (Flood items only)
Flood, SBU, and Wind Damage	Yes.	Yes	No	Flood	INR	EHR (WDR items only)	EPP (WDR items only)



AD SEC							
Flood, SBU, and Wind Damage	Yes	Yes	Yes	Flood	ER	EHR (WDR items only)	EPP (WDR items only)
Flood, SBU, and Wind Damage	Yes	Yes	No	Homeowners and Flood	INR and INI	INI and INFI	INI
Flood, SBU, and Wind Damage	Yes	Yes	Yes	Homeowners and Flood	INI	INI and INFI	INI
COD = Flood and SBU/	Seepage Da	mage					
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
Flood and SBU/Seepage	No	No	No	None or Any Type	IID	IID.	IID.
Flood and SBU/Seepage	Yes	Yes	No	None or Homeowners w/o SBU	INR	EHR/EHRZ	EPP/EPPZ
Flood and SBU/Seepage	Yes	Yes	Yes.	None or Homeowners w/o SBU	ER	EHR/EHRZ	EPP/EPPZ
Flood and SBU/Seepage	Yes	Yes	No	Homeowners w/ SBU	INR and INI	EHR/EHRZ (Flood items only)	EPP/EPPZ (Flood items only)
Flood and SBU/Seepage	Yes	Yes	Yes	Homeowners w/ SBU	INI	EHR/EHRZ (Flood items only)	EPP/EPPZ (Flood items only)
Flood and SBU/Seepage	Yes	Yes	No	Flood	INR	INFI	INI
Flood and SBU/Seepage	Yes	Yes	Yes	Flood	ER	INFL	INI
Flood and SBU/Seepage	Yes	Yes	No	Homeowners w/o SBU and Flood	INR	INFL	INI
Flood and SBU/Seepage	Yes	Yes	Yes	Homeowners w/o SBU and Flood	ER	INFI	INI

Scenarios assume that Homeowners Insurance covers ALE/LOU.

Remember to process **Uninsurable** items as eligible regardless of insurance types or COD.

FEMA will NOT request an insurance settlement if the recorded COD is NOT a covered peril within the applicant's insurance coverage.

Table 6: Initial Determinations for Inspected Applicants with Multiple Causes of Damage

COD = Flood							
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
Flood Damage Only	No	No	No	None or Any Type	IID	IID	IID



Flood Damage Only	Yes	Yes	No	No <u>ne</u>	INR	EHR/EHRZ	EPP/EPPZ
Flood Damage Only	Yes	Yes	Yes	None	ER	EHR/EHRZ	EPP/EPPZ
Flood Damage Only	Yes	Yes	No.	Mobile Home	INR and INI	INFL	INI
Flood Damage Only	Yes	Yes	Yes	Mobile Home	INI	INFI	INI
COD = Hail, Rain, WDR	R, Ice, Snow, Pov	ver Surge,	or Lightning				
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
WDR Damage Only	No.	No	No	None or Any Type	IID.	IID	IID.
WDR Damage Only	Yes	Yes	No.	None	INR	EHR	EPP
WDR Damage Only	Yes	Yes	Yes	None	ER.	EHR	EPP.
WDR Damage Only	Yes	Yes	No	Any Type	INR and INI	INJ	INI
WDR Damage Only	Yes	Yes	Yes	Any Type	INI	INI	INI
Multiple CODs = Flood	(SBU or Seepag	je) and WD	R Type				
Type of Line Items	PP Dmg	HRR	Moved	Insurance Types	RA Elig. Code	HR Elig. Code	PP Elig. Code
Flood and WDR	No.	No	No	None or Any Type	IID.	IID	IID.
Damage				>> >>>			
Flood and WDR	Yes.	Yes	No	None	INR	EHR/EHRZ	EPP/EPPZ
D <u>amage</u>							
Flood and WDR	Yes	Yes	Yes	None	ER.	EHR/EHRZ	EPP/EPPZ
Damage							
Flood and WDR	Yes	Yes	No	Mobile Home	INR and INI	INI and INFI	IŅI
D <u>amage</u>							
Flood and WDR	Yes	Yes	Yes.	Mobile Home	INI	INI and INFI	INI
D <u>amage</u>		1 1					

Scenarios assume that Homeowners Insurance covers ALE/LOU.

Remember to process Uninsurable items as eligible regardless of insurance types or COD.

FEMA will NOT request an insurance settlement if the recorded COD is NOT a covered peril within the applicant's insurance coverage.

Table 7: Initial Determinations for Inspected Applicants with Mobile Home Insurance



Recoverable Depreciation Calculation

- Recoverable depreciation will ONLY be included in the adjusted net settlement amount when it has been verified by the insurance company that it was disbursed to the applicant.
 - a. Verbal verification of a recoverable depreciation payment with the insurance company is required. Once verified, the amount of the recoverable depreciation payment will be included in the adjusted net settlement prior to an IHP determination for Home Repair Assistance.
 - i. If verified with the insurance company that the applicant did receive the recoverable depreciation, the adjusted net insurance settlement (depreciation recovered) for their RP would be \$14,668.56.

Summary for CoverageA_D	welling
Line Item Total	13,879.04
Overhead	1,387.92
Profit	1,387.92
Material Sales Tax	513.68
Replacement Cost Value	\$17,168.56
Less Depreciation	(2,905.74)
Actual Cash Value	\$14,262.82
Less Deductible	(2,500.00)
Net Claim	\$11,762.82
Total Recoverable Depreciation	2,905.74
Net Claim if Depreciation is Recovered	\$14,668.56

Figure 1: Insurance Summary for Dwelling

ii. If verified with the insurance company that the applicant DID NOT receive the recoverable depreciation, the adjusted net insurance settlement for their RP would be \$11,762.82.

Comparing the Adjusted Net Settlement to the FVL

- 1. **IDENTIFY** the type(s) of insurance held by the applicant.
- 2. **IDENTIFY** the cause(s) of damage to RP/PP.
- 3. CALCULATE the FVL for each COD.
- 4. Following the sequence of delivery, **COMPARE** losses for Home Repair Assistance and Home Replacement Assistance before reviewing ONA.
- 5. For like perils:
 - a. **COMPARE** the adjusted net insurance settlement, if less than the financial HA maximum award, with the FVL for RP **Insured** and **Not Insured** items.





- 6. If the adjusted net insurance settlement for a covered peril is greater than the FVL and there are NO Not Insured or Uninsurable items:
 - a. The applicant will be ineligible for losses from the covered peril.
 - b. If there are NO other covered perils, **GENERATE** an **INI/INFI** letter with the corresponding text insert.
- 7. If the adjusted net insurance settlement for a covered peril is less than the FVL:
 - a. The applicant will be eligible for the unmet need up to the established program limit NOT to exceed the FVL.
 - b. **DEDUCT** the adjusted net insurance settlement for each applicable insurance type from the total FVL for the like damage type.
 - c. The applicant will be eligible for the unmet need using either EHR/ERPL, EHRZ/ERPLZ, or EPP/EPPZ eligibility codes.

Example 1: Review of Peril (COD) NOT Cover by Insurance Policy

 The applicant DID NOT report having other damage and the inspection only recorded damage caused by flood in a Flood Zone A. The applicant is NFIRA compliant, DID NOT have flood insurance, and SBA = HAPP. The applicant DID NOT provide insurance settlement or denial information. Refer to the Appendix for information on using the Eligibility Calculators.

COD	FEMA Verified Losses (FVL)	Insurance Types	Net Insurance Settlement	Potential Award
Flood only	Home Repair Assistance \$20,000.00	ној	\$0.00	\$20,000.00

Table 8: FEMA Verified Losses Example

- a. First, **IDENTIFY** the insurance type (in this case HOI) with the associated insurance settlement/denial information (in this case, NO insurance documents were received).
 - i. FEMA will NOT request an insurance settlement if the peril is NOT covered by the applicant's insurance.
- b. Second, COMPARE the FVL to the net insurance settlement by category and insurance type: The FVL \$20,000.00 - \$0.00 HOI Net Insurance Settlement = \$20,000.00 Unmet Need.

Result: PROCESS Home Repair Assistance (EHRZ) in the amount of \$20,000.00.



Example 2: Comparison of multiple insurance settlements, perils (CODs), and categories

1. The applicant DID NOT report having other damage and the inspection recorded damage caused by WDR, power surge, and flood. The applicant is NFIRA compliant and has both HOI and flood insurance. The applicant DID NOT provide an itemized list of each item paid by the insurance companies. Refer to the Appendix for information on using the Eligibility Calculators.

COD	FEMA Verified Losses (FVL)	Insurance Types	Net Insurance Settlement	Potential Award
Hail/Rain/Wind Driven Rain	Home Repair Assistance \$10,000.00	HOI - Structure	\$11,000.00	\$0.
Flood	Home Repair Assistance \$12,000.00	Flood - Structure	\$9,000.00	\$3,000.00
Power Surge	P.P. \$4,000.00	HOI - Content	\$3,000.00	\$1,000.00

Table 7: FEMA Verified Losses Example

- First, IDENTIFY the insurance types (with the associated insurance) settlement/denial information) and the losses identified by category and COD.
- b. Second, **COMPARE** the FVL to the net insurance settlement by category and insurance type.
 - i. **WDR**: The Home Repair Assistance FVL (\$10,000.00) (\$11,000.00) Net Insurance Settlement (HOI Structure) = (-\$1,000,00). NO unmet need (insurance settlement is greater than the FVL).
 - Flood: The Home Repair Assistance FVL (\$12,000.00) (\$9,000.00) Net Insurance Settlement (Flood Structure) = (\$3,000.00) unmet need.
 - iii. Power Surge: The PP FVL (\$4,000.00) (\$3,000.00) Net Insurance Settlement (HOI Content) = (\$1,000.00) unmet Need.

Result: PROCESS Home Repair Assistance (EHR/EHRZ) in the amount of \$3,000.00 (\$0.00 HOI + \$3,000 Flood Ins), AND

PROCESS PP Assistance (EPP) in the amount of \$1,000.00.

Itemized Insurance Settlements