

# Disaster Recovery Reform Act Section 1206

Building Code and Floodplain Management Ordinance  
Administration and Enforcement

FEMA Policy FP 204-079-01 Training | April 2021



# FEMA

# FEMA Public Assistance

## Policy Information and Implementation Guidance

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# Authority

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## DRRA 1206, Code Administration and Enforcement amended Sections 402 and 406 of the Stafford Act

- **Section 402:** “provide assistance to state and local governments for building code and floodplain administration and enforcement, including inspections for substantial damage compliance.”
- **Section 406:** “base and overtime wages for extra hires to facilitate the implementation and enforcement of adopted building codes for a period of not more than 180 days after the major disaster is declared.”



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# More on Authority and Purpose

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- Authorizes FEMA to provide funding to state and local governments for building code and floodplain administration and enforcement.
- Policy is being implemented through the Public Assistance (PA) Program. (Note: Additional assistance may be available under Federal Insurance and Mitigation Administration [FIMA]).

## Purpose

- Provide communities with the resources needed to administer & enforce state and locally adopted building codes and floodplain management ordinances.



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## Principles

- **Increase the overall speed of recovery** by providing financial assistance to conduct building inspections, review disaster-related development in the floodplain, and issue permits to administer and enforce adopted building codes and floodplain ordinances.
  
- **Enhance compliance with state and local building codes and floodplain management ordinances** by providing state, tribal, territorial, and local governments additional resources to carry out required activities after a disaster.

# DRRA 1206 Authorizes FEMA to Provide Resources to State, Local, Tribal and Territorial Partners

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1

**Building Code Administration** (review and process building permit applications; collect fees; hire, train, supervise staff; etc.)



2

**Code Enforcement** (inspect structures; review elevation certificates; conduct and process condemnation determinations; etc.)



3

**Floodplain Management Regulation, Administration, and Enforcement** (hire, train, supervise staff; provide training; process permits; etc.)



4

**Substantial Damage Operations** (conduct field surveys; prepare cost information; perform inspections; etc.)



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# Policy Overview

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- Policy development and roll-out is a joint effort between FEMA Public Assistance and the Federal Insurance and Mitigation Administration (FIMA).
- Effective date of 11/1/20.
- The policy applied retroactively to major disaster declarations declared on or after 8/1/2017.
  - Applicants who wished to seek retroactive reimbursement must have alerted FEMA within 90 days from the effective date of this policy (which was 2/1/21) or 90 days from the Recovery Scoping Meeting (whichever was later).
- Funding is limited for 180 days after the disaster declaration date.



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# Implementation Guidance Q&A

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## What disasters are impacted by this policy?

- Any major disaster declarations with PA permanent work designations on or after 8/1/2017.



## Are there deadlines to apply for this assistance?

- Yes. For major disasters declared before 11/1/20, applicants had 90 days from the Recovery Scoping Meeting (RSM) or 90 days from 11/1/20 (2/1/21), whichever was later, to notify FEMA of its intent to seek reimbursement. Page 12 of the policy is an opt-in form that was used for past-disaster reimbursement.
- For disasters declared after 11/1/20, applicants have the normal 60 days from RSM to report incident related impacts to FEMA PA. Opt-in form is not needed.



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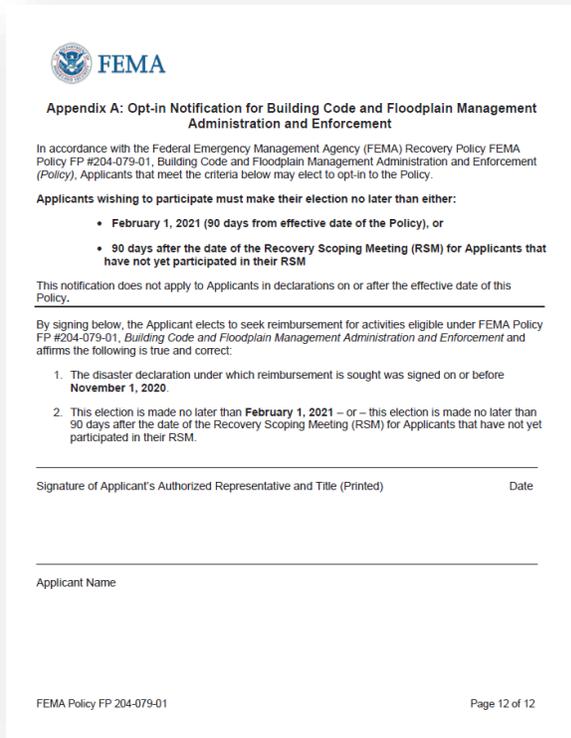


# Notification of Intent, Past Disaster Reimbursement Scenario



*A Major Disaster was declared for PA categories C-G (permanent work) on 7/4/2020. The Applicant held its Recovery Scoping Meeting (RSM) on 8/4/2020.*

- Because the disaster was declared prior to the effective date of the policy (11/1/2020), the Applicant had up to 90 days from the policy effective date or 90 days from the RSM, whichever was later. 90 days from the policy effective date was later, so the Applicant had until 2/1/2021 to notify state PA and FEMA of its intent to apply for funding. They would have used the opt-in form on page 12 of the policy. Their 180 days for reimbursement under the policy would have started on 7/4/2020, the disaster declaration date.



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# Notification of Intent, Future Disaster Scenario

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*A Major Disaster is declared for PA categories C-G (permanent work) on 6/28/2021.  
The Applicant held its Recovery Scoping Meeting (RSM) on 7/28/2021.*

- Because the disaster was declared after the effective date of the policy (11/1/2020), the Applicant has the normal FEMA PA requirement to identify and report incident-related impacts to FEMA within 60 days of the RSM. Their 180 days for reimbursement under the policy starts on the disaster declaration date, 6/28/2021.



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# Six Month or 180-Day Reimbursement Limit Q&A

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Why is reimbursement limited to 180 days after the date of a major disaster declaration? Can it be extended?

- DRRRA Section 1206 was written by Congress after completing a public comment period in the Federal Register. Congress specifically defines a period of no longer than 180 days after the date of a major disaster declaration. At this time, FEMA is unable to support activities occurring more than 180 days after the date of the respective major disaster declaration.



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# Eligibility Q&A

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## Who is eligible for support under DRRRA Section 1206?

- State, local, tribal, and territorial (SLTT) governments with a major disaster declaration are eligible for this type of assistance, consistent with other grants under FEMA's PA Program. SLTT governments must be in good standing with the National Flood Insurance Program (NFIP), as FEMA will not fund activities under this policy in a community that is suspended from or has been sanctioned for not participating in the NFIP. Additionally, eligible applicants must be legally responsible to administer and enforce building codes or floodplain management regulation (e.g., if a county is legally responsible, then the county would be the Applicant; if a community has a mutual aid agreement, the community is still the applicant).



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# Uses and Eligibility Q&A

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**Can the Applicant request an Alternate Project or consolidate this funding into a PA Alternative Procedures permanent work project?**

- No. Work eligible under this policy is only available for the intended purpose of the grant.



**My community has been suspended from the National Flood Insurance Program (NFIP). Is my community still eligible to receive this assistance?**

- No. If a community has been suspended from the NFIP or sanctioned for not participating in the NFIP, they are not eligible for PA funding (see FEMA Policy FP 204-079-01, A.6.).



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# Work Eligibility Criteria, Bldg. Code

## Must be:

- Performed in a designated area of the major disaster declaration and;
- Relate to the repair, replacement or retrofit of disaster-damaged structures (public, private and residential) in the jurisdiction of the Applicant.
- Consistent with the work normally done to administer and enforce building codes.

## Eligible Work: Building Code Administration & Enforcement

- Review and process applications for building permits; certificates of occupancy; certificates of compliance
- Hire, train, supervise, certify, and license staff, as required to conduct eligible activities
- Provide training and outreach to the public on building code and building permit requirements
- Establish construction plan review and inspection processes, procedures, and instructions for permit holders
- Inspect structures
- Monitor impacted areas for unpermitted construction activities
- Identify and carry out corrective actions
- Review and issue elevation certificates



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# Work Eligibility Criteria, Floodplain

## Must be:

- Performed in a designated area of the major disaster declaration and;
- Relate to the repair, replacement or retrofit of disaster-damaged structures (public, private and residential) in the jurisdiction of the Applicant.
- Consistent with the work normally done to administer and enforce the floodplain ordinance.

## Eligible Work: Floodplain Management Administration & Enforcement

- Process disaster-related floodplain permits
- Provide public training, info & outreach on compliance
- Review disaster-related development for compliance
- Hire, train, supervise, train, license staff
- Inspect all disaster-related development
- Monitor impacted areas for unpermitted construction activities
- Process, maintain, and track temporary occupancy permits and inspect temporary occupancy buildings
- Provide training and information to staff, contractors, and the public on unique considerations for repair of disaster-damaged historic buildings



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# Work Eligibility Criteria

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## Must be:

- Performed in a designated area of the major disaster declaration and;
- Relate to the repair, replacement or retrofit of disaster-damaged structures (public, private and residential) in the jurisdiction of the Applicant.
- Consistent with the work normally done to administer and enforce the building code/floodplain ordinance.

# Eligible Work: Substantial Damage Determinations

- Conduct initial substantial damage (SD) field surveys
- Prepare repair cost and market value estimates for SD
- Enter damage inventory administrative data into the Substantial Damage Estimator or comparable data collection software
- Track cumulative SD and repetitive loss, if required
- Hire, train, supervise, train, license staff
- Inform property owners of damage determination and provide compliance requirements
- Review, adjudicate, and resolve Substantial Damage Determination appeals



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# Policy Overview—Ineligible Work

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- Activities associated with non-disaster damaged development
- Activities to update a community's laws, rules, procedures, or requirements. Examples:
  - Updating building codes,
  - Adopting new zoning requirements,
  - Developing new land use plans.



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# Updating or Adopting New Building Codes Q&A

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## Can a community use this funding to update or adopt new building codes?

- DRRA Section 1206 reimbursement is only eligible for work required as a result of the major disaster declaration. Although updating building codes to reflect current data is critical to safety, outdated building codes are not a result of the disaster and are therefore not eligible for funding. Interested applicants should contact their local building code official for alternative resources to update or adopt new building codes.



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# PA Permanent Work Project and Higher Standards Scenario

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*After a disaster is declared, a community decides to update its building code to require a four-foot freeboard for all buildings in the special flood hazard area.*

- Work associated with administering and enforcing the four-foot freeboard for disaster-damaged buildings in the community is eligible under this policy.
- However, PA would not fund the physical repairs to a school building to meet the new four-foot freeboard requirement since the code was adopted after the date of the disaster declaration and therefore ineligible according to PA regulation and policy.
- This policy does not change the eligibility criteria for PA Permanent Work projects. Activities to administer and enforce building code and floodplain ordinances authorized by this policy are eligible regardless of whether the building code or floodplain ordinance in question meets PA's regulatory eligibility criteria for Permanent Work.



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## Cost Eligibility Criteria

- Funded at the Permanent Work cost-share applicable to the event
- Funding eligible for 180 days after major disaster declaration date
- All claimed costs must be necessary and reasonable and are subject to program eligibility and other Federal requirements, including those related to procurement and contracting
- PA prohibited from providing assistance that duplicates funding from another available program



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## Eligible Costs

- Overtime for budgeted employees
- Straight and overtime for unbudgeted employees & extra hires
- Costs associated with temporary hires or contract support is eligible
- Other costs associated with extra hires or contracted support may be eligible for reimbursement. This includes costs for travel, accommodations, and per diem, as appropriate
- Purchase of supplies and equipment to execute work is eligible
- Mutual Aid or EMAC costs are eligible depending on agreement
- Legal cost related to enforcing building code or floodplain ordinance

# Labor Costs Scenario

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*City of Nowhere was significantly impacted by a major hurricane and the area is declared a major disaster for FEMA Public Assistance. Thousands of homes require a building inspection to determine the extent of damage. In order to complete the inspections, the city enters an agreement with Volunteer Fire Station #1. The Volunteer Fire Station is a private non-profit entity. Will FEMA provide funding for the costs of the Volunteer Fire Station to perform the inspections?*

- Yes, FEMA would provide reimbursement to the city. The city is the requestor. The labor costs depend on the contractual agreement between the parties. Since the building inspections are not part of the normal duties of the Volunteer Fire Station, the volunteer fire staff may be considered temporary hires or contractual support.
- For contracted employees, applicants must follow all required federal procurement requirements.
  - Pre-positioned contracts can be sought, but must follow federal procurement requirements.



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# Cost Share Question and Answer



If I have volunteers help do the inspections, can that count towards the cost share?

- Will need to track start and end times, and there is a template to utilize. Based on agreed upon labor rate with state, or what the community would typically pay for that skill set. Rate set with state.

	A	B	C	D	E	F	G	H
1	DR/EM# _____		Applicant _____			Local Documenting Official _____		
2	Volunteer Name		Time In	Time Out	Total Hours	Address/Location of Worksite	Detailed Description of Work (Debris removal, tarp roofs, etc.)	
3	Last	First						
4	<i>Sample: Doe</i>	<i>Jane</i>	<i>8:00</i>	<i>13:00</i>	<i>5</i>	<i>123 Main St. Anywhere, TX</i>	<i>Moved debris blocking driveway from Anywhere Elementary School</i>	
5								
6								



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# Notes on PA Eligible Costs

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- Funding is consistent with PA force account labor eligibility
  - Temporary hires, reassigned staff, budgeted/unbudgeted
- Any fees collected will offset the final costs of the PW at closeout
  - *DRRA Section 1206 Policy C.11.: Revenue collected by the applicant (including fees and fines) for the performance of eligible work funded under this policy is considered program income. The project worksheet will be reduced accordingly during closeout. FEMA will deduct income from total project costs as specified in 2 CFR Section 200.80 and 200.307. If the applicant waives fees or fines following the disaster, FEMA will still reduce the eligible costs by the amount that the fees or fines would have been.*



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# Category of Work Q&A

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## What category of work does DRRRA Section 1206 fall into?

- Eligible activities for DRRRA Section 1206 reimbursement follow the emergency work labor policy and will be captured on a Category G (CAT G) Project Worksheet; DRRRA Section 1206 work is funded as CAT G, using emergency work funding rules typical of CAT B, where overtime (OT) is funded instead of the normal permanent work reimbursement rules.



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# Disaster Declaration Scenario

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*Washington County has been damaged extensively in residential areas by a tornado. The county is part of a major disaster declaration for FEMA Individual Assistance (IA). Can the county apply for reimbursement under DRRRA Section 1206?*

- No. DRRRA Section 1206 reimbursement is only available if a disaster declaration includes a Public Assistance declaration, Categories C-G, Permanent Work. Even large IA declarations with significant damage in the Special Flood Hazard Area (SFHA) would not qualify for DRRRA Section 1206 reimbursement because they do not involve PA.
- Additionally, sometimes areas are declared for PA Emergency Work, Categories A-B only. In those cases, reimbursement under DRRRA Section 1206 is also not available.



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# How Do Communities Apply?

- Communities must submit their applications for reimbursement and all supporting documentation through the PA Grants Portal.

<https://grantee.fema.gov/>



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A screenshot of the Grants Portal login page. At the top left is the "Grants Portal" logo with social media icons. At the top right is a "Help" link. A yellow warning box contains the text: "This Portal Is for Governments and Non-Profits Use Only", "Individuals looking for Individual Assistance, please visit disasterassistance.gov for assistance.", and "Businesses looking for assistance should visit the Small Business Administration's disaster assistance website." Below this is a "Sign in to Your Account" section with a key icon. It includes "USERNAME" and "PASSWORD" labels, each with a "Forgot your [username/password]?" link. There are two empty input fields. A blue "SIGN IN" button is at the bottom, with a link "Register Your Organization for Public Assistance" below it.

# Supporting Documentation Needed

- Supporting documentation is needed:

- Work completed.
- Costs incurred.
- Location of work.
- Validate EMAC resource requests or intrastate/interlocal mutual aid requests.
- If work was performed by contract labor, the applicant will submit to FEMA all documentation demonstrating federal procurement rules in 2 CFR Part 200 were followed.
- In addition, FEMA may require that the applicant provide documentation demonstrating that the eligible activities are in support of the community’s legally adopted building code or floodplain management ordinance.

*Example of a timesheet needed for documentation.*

	10/12/2020	10/13/2020	10/14/2020	10/15/2020	10/16/2020	10/19/2020	10/20/2020	10/21/2020	Totals
John D									
Regular	8	8	8	8	8	8	8	8	64
OT	3	3	3	3	3	3	3	3	24
Jane D									
Regular	8	8	8	8	8	8	8	8	64
OT	2	2	2	2	2	2	2	2	16



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# What Happens Following Community Submission?

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1. FEMA PA Program Delivery Manager (PDMG) will formulate a project.
2. PA Applicant and PDMG will work together to answer Essential Elements of Information (EEI) questions and gather appropriate documentation to substantiate eligibility of work and cost claimed.
3. PA PDMG will forward project to Consolidated Resource Center for processing.
4. Funding is obligated.
5. Once work is complete, Applicant will reconcile final costs and submit project and all supporting documentation to Recipient for closeout.
6. Recipient will reconcile final costs and review supporting documentation.
7. Recipient forwards closeout package to FEMA.
8. FEMA will review closeout package and supporting documentation. Any offsets that need to be taken will be addressed at that time.
9. FEMA will close the project worksheet (grant).



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# Suggested Next Steps

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## For FEMA/and State Staff

- Read the policy. Position specific training to come.
- Utilize the FEMA DRRA Section 1206 Communication Toolkit, including:
  - *Frequently Asked Questions* PDF
  - Introductory Webinar Slides
- Reach across program areas with questions and coordination, including PA to floodplain/NFIP, floodplain/NFIP to PA.
- Encourage Community PA POC to loop in floodplain administrator and building code official.

## For Communities:

- Floodplain administrators and/or building code officials should begin discussions with their Community PA POC about the policy.
- Have a substantial damage plan in place.
- Have contracts or agreements in place that meet federal procurement guidelines.
- Familiarize yourself with Emergency Management Assistance Compacts (EMACs).



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# FEMA Floodplain Management

National Flood Insurance Program (NFIP)

Post-Disaster Community Floodplain Responsibilities

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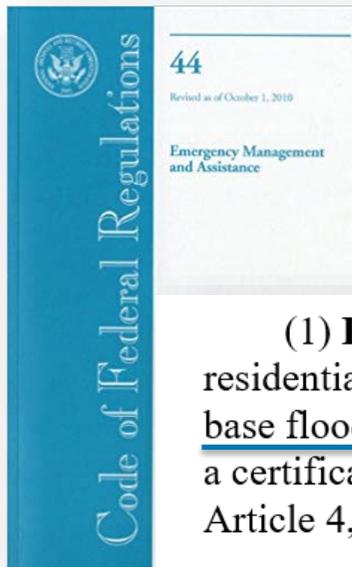
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# NFIP Participation: Communities Adopt and Enforce Floodplain Ordinances

*“Flood insurance shall not be sold or renewed under the program within a community, unless the community has adopted adequate flood plain management regulations consistent with Federal criteria.” [44 CFR 60.1](#)*



## Model Floodplain Ordinance

Louisiana Department of Transportation and Development

**(1) Residential Construction** - new construction and substantial improvement of any residential structure shall have the lowest floor (including basement), elevated to or above the base flood elevation. A registered professional engineer, architect, or land surveyor shall submit a certification to the Floodplain Administrator that the standard of this subsection as proposed in Article 4, Section C (1) a., is satisfied.

**Note:** In coastal zones, the lowest horizontal structural member must be elevated to or above the BFE.



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# Damage by Any Source Must be Assessed and Be Made Compliant

The local floodplain administrator's job is to assess damage before residents begin repairs and to issue permits that comply with flood-related guidelines.

- Flood
- Tornado
- Fire
- Hurricane
- Earthquake
- Debris impact, etc.



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# Substantially damaged homes (by any source) cannot just be repaired. They must come into compliance.

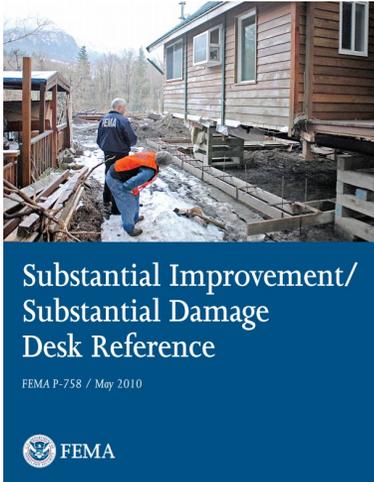
- Floodproofing a non-residential structure.
- Relocating the structure outside the floodplain.
- Elevating the building to the base flood elevation plus any local higher standards
- Demolishing the home.



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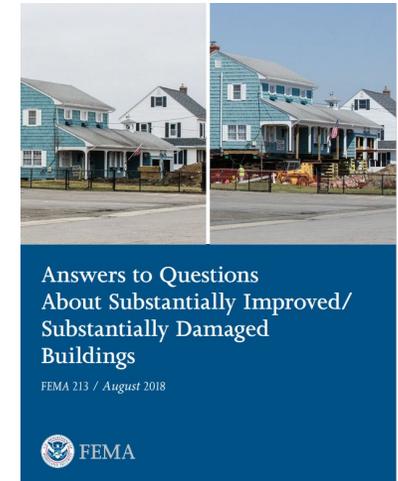


# FEMA Guidance



## Substantial Improvement/Substantial Damage Desk Reference, FEMA P-758

## Answers to Questions About Substantially Improved/Substantially Damaged Buildings, FEMA 213



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# More Insight Into Substantial Damage—YouTube Videos

## YouTube FEMA [Substantial Damage Estimator Training Modules](#):

- Module 2—Substantial Damage Basics: 8:11
  - General guidance, initial surveys, inspections and cost data
- Module 6—Field Preparation: 8:59
  - Gathering data about structures in the special flood hazard area (SFHA).
- Module 8—Field Inspections: 4:31
  - FPA travels to sites, inspects outside and possibly inside of structure, takes photos and records data (possibly on tablets).



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# FEMA Contracting Directly with Communities for Substantial Damage Inspections Q&A

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Will FEMA or FEMA contractors be conducting substantial damage assessments for our community like they've done in past disasters?

- Generally, no.
- Part D, Direct Assistance, on page 8 of the policy does allow for direct contract help through the Federal Insurance and Mitigation Administration (FIMA), under specific situations only, which will be subject to a cost-share.
- Communities need to position themselves to be able to conduct or contract out on their own for inspections, as this is now a reimbursable cost under the DRRRA Section 1206 policy.



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# Direct Assistance Through FIMA SD Data Collection Contract

- Part D, Direct Assistance, in the policy is not connected to FEMA Public Assistance.
- Inspection contract assistance may be available to support communities in cases where the State, Tribal, Territorial and local government lack the capability to perform or contract for eligible substantial damage data collection related efforts due to the extreme catastrophic nature of an event or a demonstrated lack of resources.



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11. Revenue collected by the applicant (including fees and fines) for the performance of eligible work funded under this policy is considered program income. The project worksheet will be reduced accordingly during closeout. FEMA will deduct income from total project costs as specified in 2 CFR Section 200.80 and 200.307. If the applicant waives fees or fines following the disaster, FEMA will still reduce the eligible costs by the amount that the fees or fines would have been.

#### D. Direct Assistance through FEMA's Federal Insurance and Mitigation Administration

**Outcome:** To describe the process for assistance under FEMA's Federal Insurance and Mitigation Administration's Substantial Damage Data Collection Contract.

1. Work described in this section is funded through FEMA's Substantial Damage Data Collection Contract, which is currently funded as a task order under the Production and Technical Services Contract administered by the Risk Management Directorate of FEMA's Federal Insurance and Mitigation Administration. Refer to the relevant State NFIP Coordinator or FEMA Regional Floodplain Management and Insurance Branch Chief for more information on the contents of this section.
2. For substantial damage data collection work described in section B.3.d(i-xiii) of this policy, FEMA's Substantial Damage Data Collection Contract may be available to support communities in cases where the State, Tribal, Territorial and local government lack the capability to perform or contract for eligible substantial damage data collection-related efforts due to the extreme catastrophic nature of an event or a demonstrated lack of resources.
3. Assistance provided through FEMA's Substantial Damage Data Collection Contract for disasters declared on or after the effective date of this Policy will be subject to the Permanent Work cost-share applicable to the disaster.
4. Local governments that seek assistance through FEMA's Substantial Damage Data Collection Contract must submit a request in writing to the State, which will review and, if warranted, submit the request Regional Administrator which shall include:
  - a) A statement as to the reasons the State, Tribal, Territorial, or local government cannot perform or contract for performance of the requested work;
  - b) Agreement that the State, Tribe, or Territory will hold and save the United States free from damages due to the requested work, and shall indemnify the Federal Government against any claims arising from such work; and

# Direct Assistance Through FIMA SD Data Collection Contract, Continued

- Must submit a request in writing to the State, which will review and, if warranted, submit the request to the Regional Administrator which shall include: reasons why the government cannot perform or contract for the work, a free from damages/indemnity agreement, and agreement for the non-federal cost-share.
- Subject to Permanent Work cost-share.
- Assistance for work provided under FEMA's Substantial Damage Data Collection Contract cannot also be reimbursed through the PA program. Other work and costs can be.



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11. Revenue collected by the applicant (including fees and fines) for the performance of eligible work funded under this policy is considered program income. The project worksheet will be reduced accordingly during closeout. FEMA will deduct income from total project costs as specified in 2 CFR Section 200.80 and 200.307. If the applicant waives fees or fines following the disaster, FEMA will still reduce the eligible costs by the amount that the fees or fines would have been.

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  - a) A statement as to the reasons the State, Tribal, Territorial, or local government cannot perform or contract for performance of the requested work;
  - b) Agreement that the State, Tribe, or Territory will hold and save the United States free from damages due to the requested work, and shall indemnify the Federal Government against any claims arising from such work; and

## Part D: Direct Assistance Scenario

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*A medium-sized community is hit with a hurricane on the Louisiana coast. 50% of their housing stock is impacted by wind and flood. They don't have GIS capabilities, nor do they have prepositioned contracts. The mayor, floodplain administrator and other staff are impacted and living in a hotel in another community. They ask for FEMA assistance to conduct inspections on their behalf since they will not be able to inspect, nor contract for inspections in a reasonable amount of time.*

- The community could petition the state for assistance.
- However, the fastest and most cost-effective route for communities to take will be to position themselves to be able to conduct or contract out on their own for inspections. This takes planning, so make sure your community has a substantial damage SOP in place now.



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# Key Floodplain Management Takeaways

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- Local officials enforcing the locally adopted substantial damage part of the ordinance is key to breaking the cycle of repeat damage and helps to keep people and property safe from flood damage.
- Quickly and efficiently notifying citizens of rebuilding requirements can save them money and heartache in the long run.
- Create and/or update your community's substantial damage plan or SOP.
  - After a disaster is too late to start planning.
- Remember the 180-day or six-month DRRRA Section 1206 reimbursement limit that begins with the disaster declaration date.
  - If you don't have a substantial damage plan or SOP in place, you may not be able to quickly implement your post-disaster duties and benefit from the reimbursement time period.



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# Resources

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# DRRA Section 1206 Resources

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- DRRA Section 1206 Communication Toolkit
  - [DRRA 1206 policy](#)
  - DRRA [webpage](#)
  - DRRA policy launch [video](#)
  - Introductory Webinar Slides, PDF
  - Frequently Asked Questions, PDF
- [Public Assistance Program and Policy Guide](#) (PAPPG)
- FEMA Public Assistance [YouTube Channel](#)
- View NFIP participation status in the [Community Status Book](#)



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# Applicable FEMA Training

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## ■ Public Assistance

- FEMA Emergency Management Institute (EMI) Independent Study (IS) Course IS-1000: [Public Assistance Program and Eligibility](#)
- IS-1002: [FEMA Grants Portal – Transparency at Every Step](#)
- IS-1009: [Conditions of the Public Assistance Grant](#)

## ■ Substantial Damage

- FEMA EMI IS-285: [Substantial Damage Estimation for Floodplain Administrators](#)
- Recorded webinar, [Substantial Damage SOP](#), 4/21/21
- Recorded webinar, [Basic Substantial Damage/Substantial Damage Estimator Tool](#), 9/28/20
- Recorded webinar, [Substantial Damage Calculations](#), 10/1/20



**FEMA**



Thank you.

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