

Substantial Damage Administrative Procedures (SDAP) Workshop Overview

South Carolina Association for Hazard Mitigation Conference

FEMA Region 4

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Presentation Objectives

- New requirement for substantial damage plan
- What is the SDAP program?
- What do communities get from participating in a SDAP workshop?
- How does the SDAP Toolkit help the Regions and states offer the program?
- What is next for SDAP?



The SDAP Toolkit is ready to launch after a year of development and pilot tests!



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New Requirement

- Local Mitigation Planning Policy Guide
- Effective April 19, 2023
- Element C
 - Communities must provide a substantial damage plan in the 5-year plan



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Element C: Mitigation Strategy Requirements

C2. Does the plan address each jurisdiction's participation in the NFIP and continued compliance with NFIP requirements, as appropriate? (Requirement 44 CFR § 201.6(c)(3)(ii))

C2-a. The plan must describe participation in the NFIP for each participant, as applicable, in accordance with NFIP regulatory requirements. The following information must be provided for each participant.¹⁴

1. Adoption of NFIP minimum floodplain management criteria via local regulation.
2. Adoption of the latest effective Flood Insurance Rate Map (FIRM), if applicable.
3. Implementation and enforcement of local floodplain management regulations to regulate and permit development in SFHAs.
4. Appointment of a designee or agency to implement the addressed commitments and requirements of the NFIP.
5. Description of how participants implement the substantial improvement/substantial damage provisions of their floodplain management regulations after an event.

Simply stating, "The community will continue to comply with the NFIP" is not sufficient to meet the requirement.

Jurisdictions not currently participating in the NFIP, where a Flood Hazard Boundary Map or FIRM has been issued, may meet this requirement by describing why the community does not participate in the NFIP.

For jurisdictions that voluntarily participate in the CRS, it is highly recommended that this description also include related activities and address any issues raised during community assistance and monitoring activities.

What is the Substantial Damage Administrative Procedures (SDAP) Program?

Challenge:

Communities are not prepared to administer Substantial Improvement/Substantial Damage (SI/SD) at scale after disasters.

Many communities have at some procedures, but they are not written down or compiled in one place, leading to inconsistent and ineffective enforcement of local SI/SD provisions when they are most meaningful.

Goal:

Communities should have a central plan for all their processes and procedures so when disaster strikes, they are ready to quickly scale up their SI/SD operations and build back stronger, more efficiently, and in compliance with the NFIP.

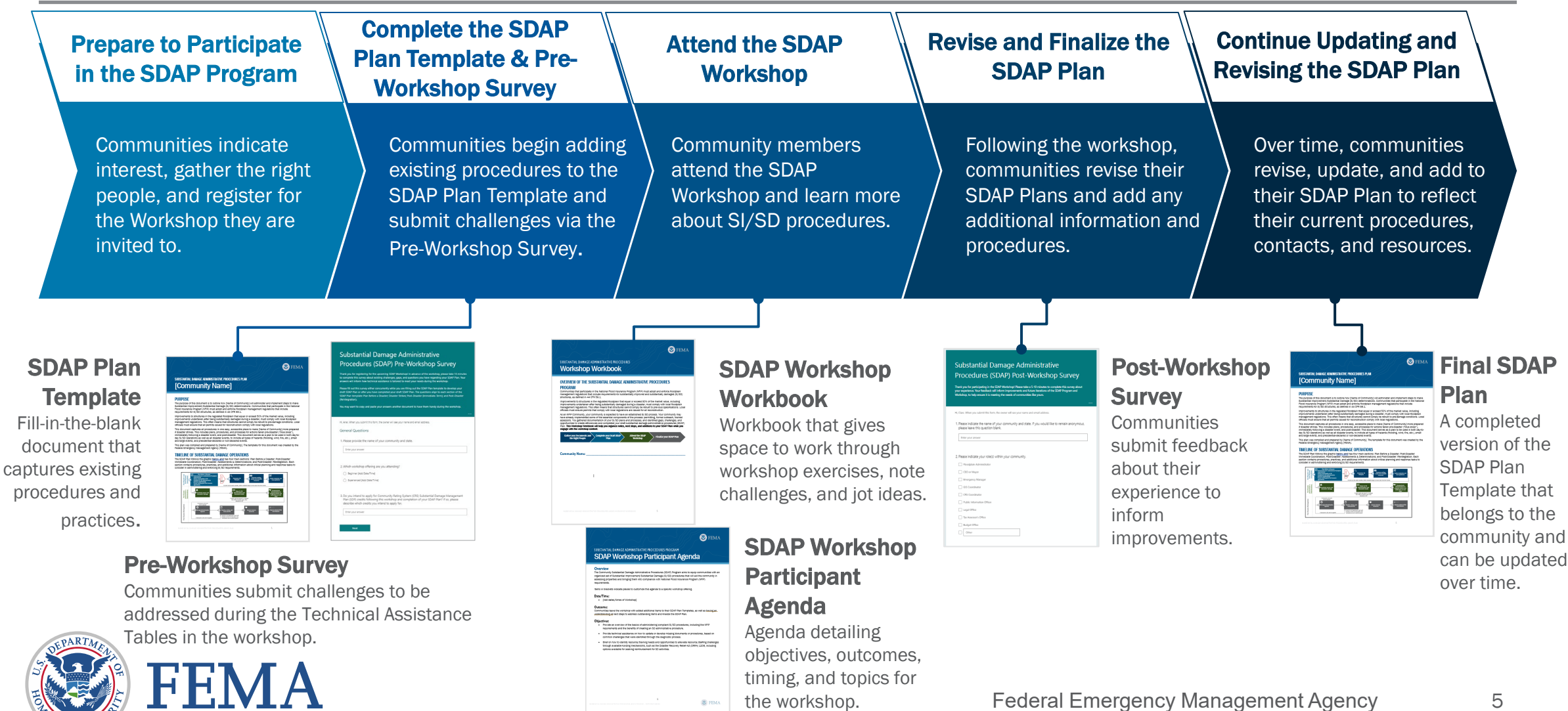
SDAP Solution:

Using the SDAP Plan Template as the foundation of their experience, flood-prone communities are shepherded through a process where they are assessed, trained, and provided technical assistance, resulting in a completed SDAP Plan to use when the next disaster strikes, and update over time.



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How Do Communities Experience the SDAP Program?



Final SDAP Plan



SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES PLAN
[Name of Community]

PURPOSE AND USE

The purpose of this document is to outline how [Name of Community] will administer and implement steps to make Substantial Improvement/Substantial Damage (SI/SD) determinations. Communities that participate in the National Flood Insurance Program (NFIP) must adopt and enforce floodplain management regulations that include requirements for SI/SD structures, as defined in 44 CFR 59.1.

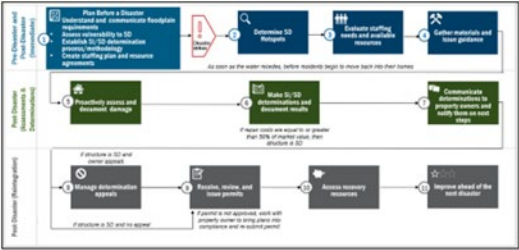
Improvements to structures in the regulated floodplain that equal or exceed 50% of the market value, including improvements undertaken after being substantially damaged during a disaster, must comply with local floodplain management regulations. This often means that structures cannot simply be rebuilt to pre-damage conditions. Local officials must ensure that all permits issued for reconstruction comply with local regulations.

This document captures all procedures in one easy, accessible place to make [Name of Community] more prepared if disaster strikes. This includes plans, procedures, and processes for actions taken pre-disaster ("blue skies"), immediately following a disaster event, and post-disaster. This document serves as a plan to be used in both day-to-day SI/SD operations as well as all disaster events, to include all types of hazards (flooding, wind, fire, etc.), small and large events, and presidential-declared or non-declared events.

This plan was compiled and prepared by [Name of Community]. The template for this document was created by the Federal Emergency Management Agency (FEMA).

Timeline of Substantial Damage Operations

The SDAP Plan follows the graphic below, and has four main sections: Plan Before a Disaster; Post-Disaster: Immediate Coordination; Post-Disaster: Assessments & Determinations; and Post-Disaster: Reintegration. Each section contains procedures, practices, and additional information about critical planning and response tasks to consider in administering and enforcing SI/SD requirements.



SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES (SDAP) PLAN

1

- A completed version of the SDAP Plan Template that belongs to the community and can be updated over time.
- It is a “living document”—one that evolves and can be updated over time as regulations, procedures, staff, and experience change



WRAP UP

Before Your Workshop

Once you have completed this form, please save, and return it to the FEMA Region or State point of contact. The Region or State will follow-up to confirm receipt and send any additional information about your scheduled SDAP workshop. Please bring a digital copy of this Diagnostic Tool to your SDAP workshop, along with any relevant supplementary materials.

After Your Workshop

During the SDAP workshop you will update your Diagnostic Tool to address challenges and gaps. After the workshop, please update your Diagnostic Tool with any new information – work with your FEMA or State POC if needed. When you have finished updating your Diagnostic Tool with all updated information, click the blue button below to generate your SDAP Repository & Guide. The SDAP Repository & Guide will serve as a central document for you to reference all of your SD administrative procedures in one easily accessible place. **Do not click the blue button until after you have attended the SDAP workshop.**

I am ready to produce my final SDAP Repository & Guide

Will be available post-workshop

More about Substantial Damage and Substantial Improvement:

- Information on the NFIP can be found online: <http://www.fema.gov/flood-insurance>
- FEMA 756: Substantial Improvement/Substantial Damage desk reference is the principal source of guidance for how to define and regulate SI/SD and provides detailed information about the inspection and determination process.
- FEMA 784 (The Substantial Damage Estimator Tool - 2017) provides a standardized approach to data collection management and the determination of substantially damaged structures for local officials. This tool also includes template determination letters communities can utilize.

SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES (SDAP) PROGRAM – COMMUNITY DIAGNOSTIC: DRAFT

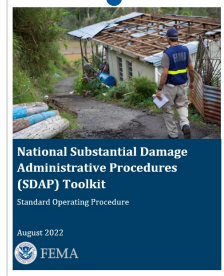
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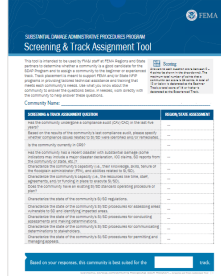


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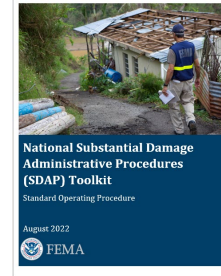
How does the Region and/or State Facilitates the SDAP Program?



SDAP SOP
Detailed guide for delivery of the SDAP program, including next steps, best practices, and templates.



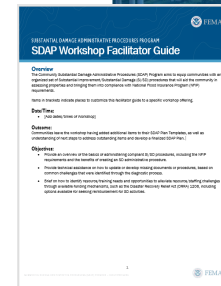
Screening & Track Assignment Tool
Fillable tool to capture already-known information about a community's capacity and capability, and to recommend a track.



SDAP SOP



SDAP Workshop Slides
Customizable slides and talking points for two, four-hour workshop days. Includes learning checks, exercises, examples, and more!



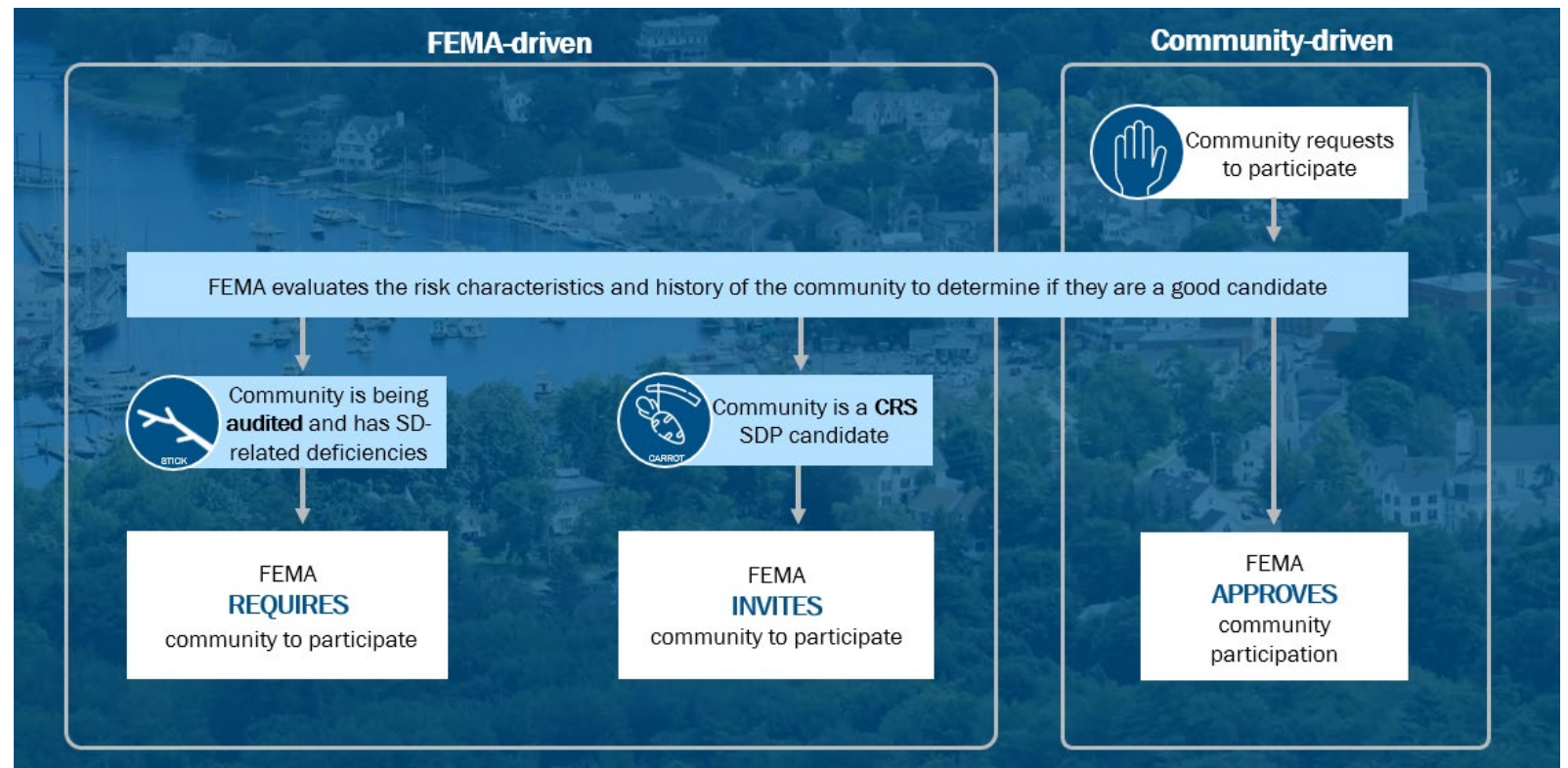
SDAP Facilitator Guide
Detailed agenda, facilitation guidance, and full SDAP Workshop Slide deck with talking points, for reference during the workshop.



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SDAP Community Identification

- Two paths for determining communities to invite:
- FEMA/State-driven
- Community-Driven



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SDAP Workshop Size Determining Factors

The number of facilitators available determines the number of communities that can feasibly attend

Content is designed so multiple communities can receive technical assistance and guidance during a single workshop

Capping the number of participating communities ensures resources and staff not stretched too thin

Recommend no more than three communities per facilitator

Communities encouraged to invite multiple staff members



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SDAP Workshop: Virtual or In-Person

	Virtual	In-Person
Pros	▪ Able to see what actions participants are taking and their reactions ▪ Able to engage more communities that are more geographically dispersed	▪ Easier to form relationships with participants ▪ Technical Assistance Tables may be more engaging ▪ Able to see what actions participants are taking and their reactions
Cons	▪ May be less engaging ▪ Harder to gauge participant actions and reactions ▪ Communities may have technology limitations	▪ Travel and venue may be more costly for FEMA/states ▪ Travel may prohibit certain communities from participating due to costs



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Screening & Track Assignment Tool

SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES PROGRAM
Screening & Track Assignment Tool

This tool is intended to be used by FM&I staff at FEMA Regions and State partners to determine whether a community is a good candidate for the SDAP Program and to assign a community to the beginner or experienced track. Track placement is meant to support FEMA and/or State NFIP programs in providing tailored technical assistance and training that meets each community's needs. Use what you know about the community to answer the questions below. If needed, work directly with the community to help answer these questions.

Scoring
Answers to each question score between 0 – 4 points (as shown in the drop-downs). The maximum total number of points that a community can score is 24 points. A total of 13 or below is designated as the Beginner Track; a total score of 14 or higher is designated as the Experienced Track.

Community Name:

SCREENING & TRACK ASSIGNMENT QUESTION	REGION/STATE ASSESSMENT
Has the community undergone a compliance audit (CAV/CAC) in the last five years?	---
Based on the results of the community's last compliance audit, please specify whether compliance issues related to SI/SD were identified and/or remediated.	---
Is the community currently in CRS?	---
Has the community had a recent disaster with substantial damage (some indicators may include a major disaster declaration, ICC claims, SD reports from the community or state, etc.)?	---
Characterize the community's capability (i.e., their knowledge, skills, tenure of the floodplain administrator (FPA), and abilities related to SI/SD).	---
Characterize the community's capacity (i.e., the resources like time, staff, agreements, and/or funding in place to execute SI/SD).	---
Does the community have an existing SI/SD standard operating procedure or plan?	---
Characterize the state of the community's SI/SD regulations.	---
Characterize the state of the community's SI/SD procedures for assessing areas vulnerable to SD and identifying impacted areas.	---
Characterize the state of the community's SI/SD procedures for conducting assessments and making determinations.	---
Characterize the state of the community's SI/SD procedures for communicating determinations to stakeholders.	---
Characterize the state of the community's SI/SD procedures for permitting and managing appeals.	---

Based on your responses, this community is best suited for the **BEGINNER** track.

SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES (SDAP) PROGRAM — Screening and Track Assignment Tool | 1

- Fillable tool to capture already-known information about a community's capacity and capability, and to recommend a track.
- 2 SDAP Workshop tracks:
 - (1) Beginner and (2) Experienced
 - Beginner: a foundational or minimal level of knowledge on SI/SD and may be seeking SI/SD basics
 - Experienced: likely have some knowledge and experience with SI/SD and are seeking additional guidance to enhance existing procedures.

Screening & Track Assignment Tool

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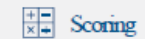


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SUBSTANTIAL DAMAGE ADMINISTRATIVE PROCEDURES PROGRAM

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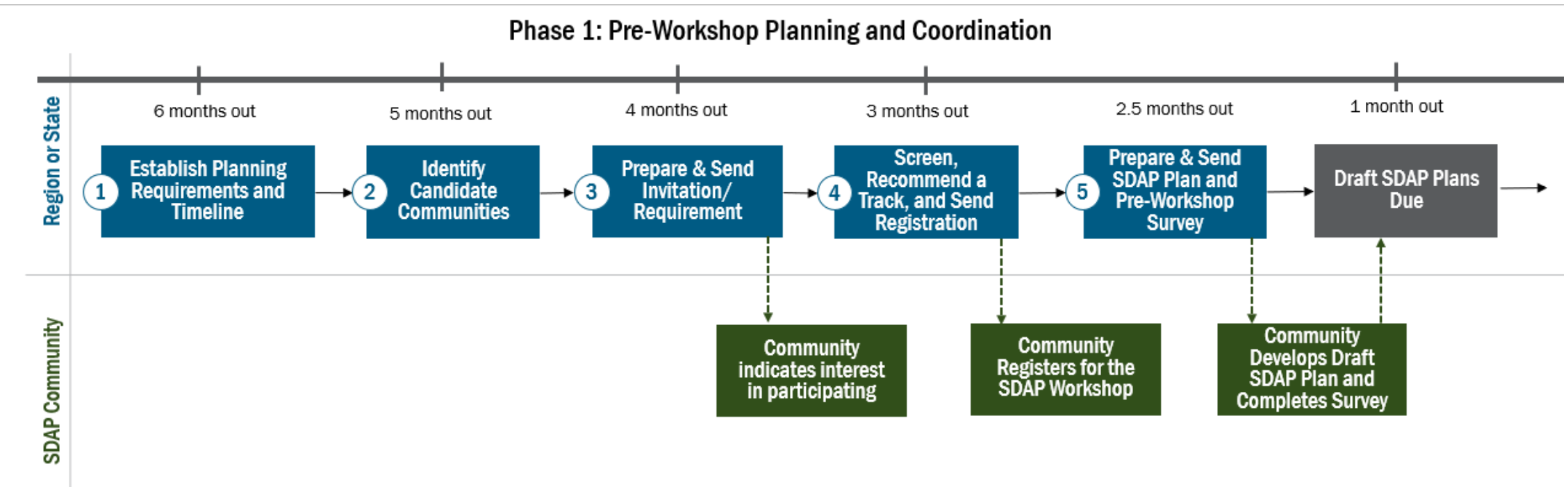
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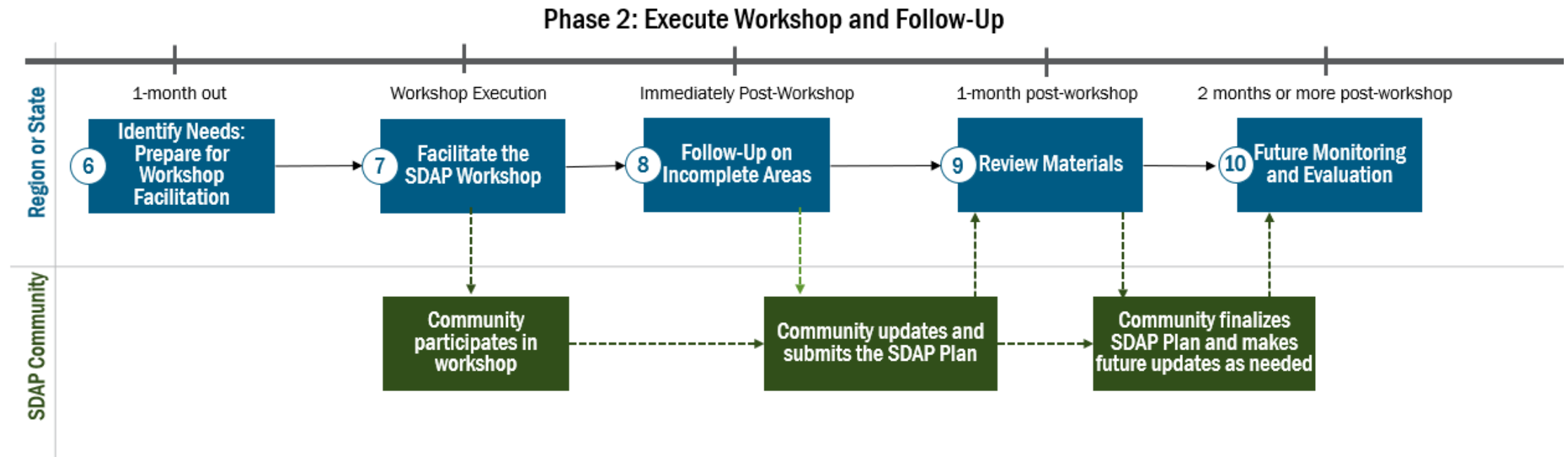
track.

SDAP Toolkit Timeline – Phase 1: Pre-Workshop Planning & Coordination



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SDAP Toolkit Timeline – Phase 2: Execute Workshop and Follow-Up



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Future Monitoring and Evaluation

SDAP Program is an iterative and based on continuous improvement

Communities may request guidance and assistance over time as they work to fill in the gaps

1 SHORT-TERM	2 INTERMEDIATE-TERM	3 INTERMEDIATE/ LONG-TERM	4 LONG-TERM
Community has SI/SD administrative procedure submitted and completed • Reported for CRS credit(s) • Assists in closing open compliance case/corrective action period i.e., "Community submits completed SDAP Repository and Guide in X weeks."	Community makes incremental improvements to its SI/SD procedures through progression in the SDAP Program tracks i.e., "Community successfully implements X additional procedures (i.e., property inventory)."	Community demonstrates compliance by successfully completing audit i.e., "X% of communities complete audit with no deficiencies or violations related to SD compliance."	Losses avoided (could be measured through losses avoided study or other means) i.e., "Losses are avoided by X% in communities that have completed this process."



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What's Next for SDAP?

Outreach to local communities

- The SC State NFIP Office will reach out to local communities to get a list of communities that would be interested attending the SDAP workshop

FEMA / SC State SDAP Team

- SDAP Team will begin the planning & coordination for future workshops
- Planning, Coordination, Execution, & Follow-Up is 6 – 8 months timeline

Revise as needed...



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Interested in attending
SDAP workshop?

Questions?



Contact Information

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