



COMMUNITY RESILIENCE BENCHMARKS® (CRB™)

The Alliance for National & Community Resilience (ANCR) is developing Community Resilience Benchmarks® (CRB™). CRBs will help communities assess their resilience and point them toward practical action they can take to become more resilient. The CRBs are organized around the concept of a whole community that relies on 19 functional areas to deliver essential services. These functional areas have their own resilience but taken together represent the resilience of the community.

Community Resilience Benchmarks for each functional area are structured around requirements (actions, plans, policies, etc.) identified as crucial to resilience within the functional area. The requirements associated with any given aspect of the functional area are organized across three tiers: Essential, Enhanced, and Exceptional. Each “higher” tier demands a greater level of community commitment, investment, and/or engagement to achieve and presumably will have greater impact on enhancing community resilience. Within each Benchmark requirement, to meet the Enhanced or Exceptional benchmark all the requirements of the Essential, or Essential and Enhanced benchmarks, respectively, must also be demonstrated as well.

In this pilot phase, Community Resilience Benchmarks are intended to provide communities with a mechanism to evaluate their current state of resilience and to identify potential actions they can take to improve resilience. As a system, the CRB process is intended to be managed under the direction of a community leader with the functional area benchmarks evaluated by personnel with day-to-day responsibility in each functional area.

Acceptable Evidence and Commentary are provided for each of the Community Resilience Benchmark requirements to assist the user in understanding the overall purpose of the requirement and some of the means for demonstrating achievement. In some cases, the community may have identified or implemented strategies that meet the intent of the requirement but may not fit with the identified acceptable evidence. The community should document this alternative approach or evidence.

The individual benchmarks were developed based on initial work by Dr. John Plodinec, further enhanced through the engagement of subject matter experts, and approved by the ANCR Board of Directors. Lessons learned from this pilot phase will be incorporated into future versions of this benchmark and into the development of other benchmarks.

CRB Glossary

- **Community** - A group of people living in the same place—a place designated by geographical boundaries that functions under the jurisdiction of a governance structure, such as a town, city, or county—and who consider themselves part of the same entity. In some instances, organizations may be considered communities and make use of the tool from their perspective—this includes campuses or corporations.

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- **Continuity of Operations Plan (COOP) or Disaster Recovery Plan (DRP)** - A COOP or DRP is a formalized document describing how the organization's functions can continue or resume quickly following a disaster. It is imperative that organizations not only develop a COOP or DRP but also test it, train personnel and document it properly before a real disaster occurs. The National Continuity Policy Implementation Plan (NCPIP) and the National Security Presidential Directive 51/Homeland Security Presidential Directive 20 (NSPD-51/HSPD-20) define a COOP in the context of the federal government as an effort within individual executive departments and agencies to ensure that Primary Mission Essential Functions (PMEFs) continue to be performed during a wide range of emergencies, including localized acts of nature, accidents and technological or attack-related emergencies.
- **Resilience** - The ability to prepare for and adapt to changing conditions and withstand and rapidly recover from disruption due to emergencies. [Presidential Policy Directive (PPD)-8 (2011) and PPD-21 (2013)].
- **Risks** – A probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through preemptive action. Risk is typically expressed as a function of threat and vulnerability.
- **Vulnerable populations** - Any individual, group, or community whose circumstances create barriers to obtaining or understanding information, or the ability to react as the general population. Circumstances that may create barriers include, but are not limited to age; physical, mental, emotional, or cognitive status; culture; ethnicity; religion; language; citizenship; and institutional enrollment (e.g., those in hospitals, nursing homes, or prisons); geography; or socioeconomic status. [Iowa Public Health Preparedness Program. Emergency planning for people with disability. Cited 2008 Nov 14.]

PILOT CRB™ BENCHMARK: HOUSING

Preamble

Housing is often the largest part of rebuilding after an emergency or disaster. Having a resilient housing community and plans in place before something happens can ensure the quick and timely recovery of the community as a whole and the individuals at its core. Housing also is a key determinant of the social resilience of a community.

Housing performs a key function in communities. Many of the other community functions rely on safe, affordable and resilient housing to support a workforce, provide a tax base, facilitate commerce, and reduce stresses on health care and educational systems. Safe housing enables communities to maintain economic continuity and a stable workforce throughout and after a natural hazard event. The safety, sustainability, resilience and affordability of a community's housing stock has a direct correlation to the community's overall resilience and the ability of a community to prepare for current and future risks.

The Housing Benchmark covers all residential structures in a community, including single family and multi-family structures. Additionally, the Benchmark addresses the differing housing needs of diverse groups, including residents with supportive housing needs, older residents, families, and congregant living facilities. The Housing Benchmark focuses on the availability of affordable housing, the quality of housing provided, the availability of shelter and transitional housing, and the continuity planning in place to ensure housing is available and maintained during a disaster. The performance of physical structures and the policies, practices, codes and standards that support them are covered in the Buildings Benchmark. Considered another way, the Housing Benchmark is focused on the functions associated with a housing authority or housing department and related agencies (including planning and community development), whereas the Buildings Benchmark is primarily focused on the activities of a code department or building department.

In achieving resilient housing, nonprofit organizations and consultants can be valuable resources—particularly for smaller jurisdictions.

CRB™ Benchmark: Housing Glossary

- **Affordable Housing** – Broadly defined as housing that does not cost more than 30 percent of household income. This document uses more specific definitions for benchmarking as necessary.
- **Area Median Income (AMI)** - This statistic is generated by the U.S. Department of Housing and Urban Development (HUD) for use in determining applicant eligibility for federal housing programs. More broadly, it is a useful statistic for determining a household's relative income as compared to other households in its community.
- **Cost-burdened** – A household or resident spending more than 30 percent of their annual income on housing (rent, mortgage, property taxes, property management fees, etc.).
- **Emergency shelters** - Structures designated for short-term, immediate sheltering (including providing food, protection, and basic public services), of individuals displaced by an emergency. Emergency shelters may be operated by governmental agencies, private sector organizations, or non-

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governmental organizations (non-profits). Emergency shelters are further defined by FEMA: https://www.fema.gov/media-library-data/1494264802106-ba1fb3179987a4a68241d0b66c68f748/NIMS_508_Short_Term_Shelter_MAR212017.pdf

- **Equitable Recovery** – A recovery effort that, at a fundamental level, ensures historic inequities within a community are addressed rather than perpetuated or exacerbated during post-disaster recovery.
- **Local Jurisdictional Agencies** – Local/municipal government departments responsible for managing housing, including developing and maintaining affordable housing. A given jurisdiction may have one or more departments or organizations that influence housing. These could include:
 - **Planning Department** – a department that creates and implements land use and comprehensive plans.
 - **Housing and Community Development Department** – a department which implements programs and is often responsible for administering federal and/or state grant programs including CDBG, HOME, and others.
 - **Local Utilities** – some local utilities build and maintain infrastructure to support functioning of housing.
- **Lower-Income Household/Resident** – Household/resident whose income does not exceed 80 percent of the median family income for the area adjusted for household size; very low-income families and extremely low-income families follow similar standards at 50 and 30 percent of area median family income respectively. Further, HUD income limits are calculated for every FMR (Fair Market Rent) area with adjustments for family size and for areas that have unusually high or low income-to-housing-cost relationships.

CRB™ Benchmark: Housing Requirements

1. Housing Affordability and Availability	
Essential Requirements	Acceptable Evidence
a) The community has a plan with numerical targets in place to show how it will make progress towards sufficient availability of affordable housing for its residents. The plan shows how affordable housing will be increasingly integrated into the broader community in a way that does not isolate households by race/ethnicity or income by making affordable housing available solely in limited locations.	<ul style="list-style-type: none"> Community has adopted a plan with quantitative targets for making housing available and affordable to extremely-low-income, very-low-income, and low-income households such that a decreasing share of such households will be cost-burdened over a 5 to 10 year time horizon, based on a credible assessment of local housing needs, including projected changes in population and households. Plan demonstrates how production of affordable housing will not be isolated only in certain neighborhoods.
Enhanced Requirements	Acceptable Evidence
b) The community is showing progress in increasing availability of affordable housing for its residents in a broad range of locations.	<ul style="list-style-type: none"> Community has achieved targets over the past 5 to 10 years for making housing more affordable to extremely-low-income, very-low-income, and low-income households based on a prior credible assessment of local housing needs. Housing availability has been increased throughout the community and is not isolated only in certain neighborhoods.
Exceptional Requirements	Acceptable Evidence
c) The community is showing significant progress in increasing availability of affordable housing for its residents beyond an essential baseline in a broad range of locations.	<ul style="list-style-type: none"> Community has not only shown progress but also created mechanisms for community groups and landowners to enforce progress towards targets prospectively, e.g. allowing homes that already have been identified as addressing affordability targets to receive development approvals without having to go through additional rounds of applications.

Commentary:

It is critical for communities to measure and hold themselves accountable for progress towards increasing housing affordability over time. Because communities start from a wide range of baselines and are experiencing a range of different growth trajectories and economic circumstances, significant details of how progress is measured will vary between communities, metropolitan and/or rural areas, and states. That said, it is important that any such metric to accomplish goals is credibly based on local circumstances and is measured over time for progress; if targets are not met, there should be ways for community groups and homebuilders to hold communities accountable for those goals. While there is no one size fits all numerical measure of progress for every

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community in the country, it is important that each community develop measures of housing affordability that address groups at various income levels and work towards satisfying the local need for affordable housing over time.

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2. Housing Affordability: Policies

Essential Requirements	Acceptable Evidence
a) The community has sufficient policies to produce, maintain, and protect affordable housing and establish resilient housing stock for low income residents and vulnerable populations/historically disadvantaged communities.	<ul style="list-style-type: none"> • Copies of studies, ordinances, plans and program materials demonstrating at least the following: <ul style="list-style-type: none"> ○ Achievement of the essential requirements of sections 1, 2, 3 and 6 of the Buildings Benchmark; ○ A mechanism to determine the number of existing illegal and/or substandard units, including a program to address substandard conditions/or bring up to code where possible; ○ A mechanism for identifying historically disadvantaged sections of the community; ○ A plan to reduce the number of permanently or seasonally homeless families/individuals and provide appropriate services; ○ A mechanism for handling tenant/landlord disputes; and ○ A plan to create and maintain homes to meet 100% of need to support local economic development at all income levels.
Enhanced Requirements	Acceptable Evidence
b) The local government has established a program (e.g., funding, regulation, incentives) to ensure the amount of affordable housing available meets the needs of the community.	<ul style="list-style-type: none"> • Outline of the program including legislation, regulation, ordinances or other statutes and program materials, along with documentation demonstrating that community initiatives were developed with constructive and effective input from and collaboration with lower-income residents and with community organizations with established histories of advocacy for those communities. • Copies of regulations and ordinances demonstrating that the community does not have barriers to constructing affordable housing in its zoning and planning regulations and ordinances (e.g. allows accessory dwelling units, allows higher-density development, avoids mandating large minimum lot sizes that drive up land costs, or avoids architectural ordinances banning certain wall and roof cladding materials or mandating certain roof types or exterior wall layouts for purely aesthetic reasons not related to mitigating hazards).
Exceptional Requirements	Acceptable Evidence
c) Ongoing efforts to meet the affordable housing needs of the community are integrated with other policies and initiatives (e.g., restrictions on land use, initiatives to improve the resilience of buildings). A written policy is in place that promotes the integration of affordable housing into the broader	<ul style="list-style-type: none"> • Documentation of the community’s comprehensive service and housing support to meet the needs of 85 to 100% of the homeless population. • Program and policy materials demonstrating that community programs are in place to increase the amount of affordable housing that meets the resilient design criteria in the Buildings Benchmark section 6 enhanced or exceptional requirements through both new

community through land use/zoning and related standards that result in the siting of affordable housing in a way that does not isolate households by race/ethnicity or income.	production and upgrade of existing homes at a rate that is determined in conjunction with the housing affordability goals described above in requirement 1. <ul style="list-style-type: none"> • Financing and approval mechanisms that are not unduly burdensome, to allow conversion of basements and garages into accessory units without compromising occupant safety.
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Commentary:

Implementing effective affordable housing policy first requires an understanding of the composition of an individual community, to ensure policies adequately address all demographic sectors of the community. The acceptable evidence for this set of requirements specifically references populations experiencing homelessness and working populations at a range of income levels. The definition of sufficient support is different for each population. Meeting the needs of homeless populations requires not only providing adequate shelter space, but also ensuring that shelter space includes comprehensive service support, such as assistance completing applications, obtaining identification, and/or overcoming language barriers. Meeting the needs of low-income populations and workforce populations is more straightforward, as it simply requires ensuring availability of affordable housing for these groups.

Because needs vary from community to community, intentional engagement with community members during policy development is critical. This engagement, if designed to learn about community member needs and incorporate them into future policy changes, can ensure more efficient and effective policies. Any new policies should have sufficient funding to ensure their implementation. As referenced in this set of requirements, policy improvement is not restricted only to the addition of new policies. In some cases, elimination of policies can be equally or more effective. Examples of appropriate policies to eliminate or change include zoning and planning regulations that drive up land costs or disallow high-density development, and policies that require maintenance of certain aesthetic preferences (e.g., lot size) that impede affordable housing development.

Notes:

3. Disaster Preparedness: Communication and Outreach

Essential Requirements	Acceptable Evidence
<p>a) The community has an outreach program that regularly communicates with residents and informs them of key services before, during and after an emergency. The program includes a range of outreach mechanisms designed to reach all community members to ensure that communications can be deployed quickly in an emergency.</p> <p>b) Information is publicly available regarding tenant rights and what tenants can do if they are in danger of eviction after a disaster.</p>	<ul style="list-style-type: none"> ● Documented community outreach including but not limited to: <ul style="list-style-type: none"> ○ Minutes from townhall meetings. ○ Online forum or social media platform (or substitute) where community members can communicate electronically. ○ Use of K-12 public education to reach families. ● Clear attempts to communicate with and accommodate all members of the community, including but not limited to: <ul style="list-style-type: none"> ○ Translated versions of all communications to ensure they are accessible on the basis of language and legibility. ○ List of identified vulnerable groups, including Limited English Proficient (LEP) populations, children, seniors, and non-ambulatory groups, and crafted and implemented focused communication and outreach. ○ Database and contact information for all properties that house vulnerable populations. These properties include federally subsidized Section 202s for the elderly, federally-subsidized Section 811s for people with disabilities, public housing, project-based rental assistance, and state-supported properties for vulnerable populations. ○ Utilization of online platforms that can quickly alert and notify housing providers and operators of situation and activation of COOP.
Enhanced Requirements	Acceptable Evidence
<p>c) Develop active networks of government, community, faith-based, philanthropic, CDFI, etc. leaders in a program to establish publicly recognized and well publicized 'go-to' sources of information.</p> <p>d) Develop innovative ways to communicate with housing providers and residents to identify needs, resources, and available units.</p>	<ul style="list-style-type: none"> ● Proof of collaboration and facilitated network. ● Documents establishing clear roles and responsibilities among government and other actors before, during, and after an event. ● Proof of communication to a broad range of residents of all income levels and races and ethnicities on what resources are available and resilience measures that should be taken, such as the importance of flood insurance (i.e. limits on typical home insurance); housing measures to improve resilience in the face of locally prevalent hazards (i.e. methods to mitigate wildfire risk; methods to bolster wind resistance; tactics to increase resistance to water intrusion; etc.)
Exceptional Requirements	Acceptable Evidence
<p>e) The community has demonstrated practices and timely activation of outreach programs and networks (defined in part c above).</p>	<ul style="list-style-type: none"> ● An annual or bi-annual exercise simulating an emergency event and practicing the community's response, assuming that communications may be limited in disaster scenarios.

Commentary:

Because it is impossible to plan for what specifically will need to be communicated during a disaster, communications preparedness should focus on building strong communication systems and appropriate language to enable government officials or other humanitarian actors to communicate with the general population immediately before, during and following a disaster. These methods of communication must be able to withstand power outages and physical barriers to travel. Communications networks should take into account community composition and demographics (e.g., prevalence of cell phone ownership, languages spoken within the community), and build on existing community networks and resources (e.g., faith-based organizations, civic groups, and townhall meetings). Testing communications networks prior to a disaster enables communities to identify gaps and areas for improvement.

FEMA emphasizes the importance of disaster communication systems in the ability of public safety agencies (such as law enforcement, emergency medical services, and fire services) to be able to provide life and home-saving services during and immediately after a disaster. Communication services allow community members to make informed decisions about evacuation as well. See also requirements under the Communications Benchmark (to be developed).

Notes:

4. Disaster Preparedness: Emergency and Temporary Shelter

Essential Requirements	Acceptable Evidence
a) The community has determined whether it has sufficient emergency shelter space and has established relationships with the agency(ies) that will provide sheltering staff and resources. It has taken steps to meet its needs, including providing a plan for transitional housing for victims of disaster.	<ul style="list-style-type: none"> ● Documented comparison of the amount of acceptable shelter space to the potential need, the susceptibility of the shelters to the significant risks facing the community, and accessibility for those who need it. ● If there is the potential for insufficient emergency shelter space, the community should determine which public or private facilities could be used as temporary shelters and secure MOUs to support their use. ● Documentation of a well-publicized shelter-in-place plan.
Enhanced Requirements	Acceptable Evidence
b) The community is prepared to meet the increased demand for shelter caused by a disaster (e.g., recession or other economic disruption, natural hazard).	<ul style="list-style-type: none"> ● The shelter-in-place plan includes resources and strategies for quick repairs to enhance the ability of households, particularly lower-income and other vulnerable households, to shelter in place. ● Community has established agreements with neighboring or regional communities for use of acceptable facilities outside the immediate at-risk geography. The community has an inventory of available housing units based on ongoing collection and assessment of housing needs.
Exceptional Requirements	Acceptable Evidence
c) The community has streamlined processes for quickly creating new shelter options if the need arises.	<ul style="list-style-type: none"> ● Community had designed and stored or has a quick production agreement for pre-designed disaster shelters. ● Community has set up a way to quickly permit and approve utility connections and sites for temporary shelters. ● Community requires any newly constructed community building (i.e. police, fire, library, school) be designed as a community shelter space.

Commentary:

Even the most prepared communities may be unable to provide sufficient shelter for their populations in the event of the disaster, absent outside assistance. Thus, communities should prioritize building relationships with groups and government-affiliates such as FEMA and the American Red Cross to prepare for the eventuality that additional shelter (and even post-disaster, see requirement 5) help is needed. (Note that “The American Red Cross is chartered by Congress to provide relief to survivors of disasters and help people prevent, prepare for, and respond to emergencies. The Red Cross has a legal status of ‘a federal instrumentality’ and maintains a special relationship with the Federal Government” – National Response Framework FEMA/DHS, 2016.)

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The core capability of shelters is to provide “life sustaining and human services to the affected population to include hydration, feeding, shelter, temporary housing, evacuee support, reunification, and distribution of emergency supplies” (as stated by the National Response Framework, 2016). Standards for the acceptability of shelter space include FEMA, Red Cross, ICC and NFPA standards. It is recommended that communities select the appropriate standard based on the agencies with which they plan to work in the event that a need for shelter space arises beyond what they are already able to provide.

While building relationships with entities that can provide additional capacity and support in the event of a disaster is necessary, the community is cautioned against publishing agreements about possible shelter space, or locations of shelter space in advance of a specific need. The need for shelter and the appropriateness of a specific type or location of shelter is contingent on multiple factors. Evacuation or sheltering may be unnecessarily hindered by misinformation. However, an effective mechanism to communicate shelter details when needed is important. Citizens should be aware of where to get the most relevant information (see requirement 3).

Notes:

5. Transitional and Post-Disaster Housing	
Essential Requirements	Acceptable Evidence
a) The community is aware of its potential post-disaster housing needs. There are emergency funds and/or other resources reserved to enable post-disaster recovery of the affordable housing market.	<ul style="list-style-type: none"> ● Evidence of efforts to generate funding such as bond issuance or working with local agencies to identify ways of leveraging funding to support housing resilience. ● An established database of all rent-restricted properties within a certain number of miles. These tenants will not typically be able to find an affordable option in the private market (especially after a disaster). ● Affirmative strategy that provides sources of potential legal aid and address any legal barriers that may exist to using vacant units post-disaster.
Enhanced Requirements	Acceptable Evidence
b) The community provides resources to help families find post-disaster housing. c) The community provides resources to assist residents and contractors in the safe and efficient repair and reconstruction of housing.	<ul style="list-style-type: none"> ● The community provides access to information on available rent-restricted properties and information on securing affordable post-disaster housing. ● The community maintains a comprehensive one-stop website that provides information on local permitting and codes requirements and helps connect contractors willing to move into the area to help rebuild with subcontractors, suppliers and potential customers all in one place.
Exceptional Requirements	Acceptable Evidence
d) The community has a program aimed at “rapidly rehousing” low-income families who lose their housing due to a disaster.	<ul style="list-style-type: none"> ● The community, in collaboration with local partners and stakeholders, has developed a post-incident safety and damage assessment plan for residences, emergency shelters and shelters for the temporarily or permanently homeless. ● Quick and easy licensing procedures, ideally licensing reciprocity, for established/competent contractors willing to move into the area to rebuild.

Commentary:

Post-disaster housing differs from shelters (addressed in requirement 4, above) in that shelters provide space for community members to reside during disasters and in the immediate weeks of the disaster aftermath, whereas post-disaster housing provides permanent housing for families who lose their housing due to a disaster. Because post-disaster housing is more permanent, ensuring appropriate disaster housing is critical to ensuring appropriate and fair recovery. As referenced below in requirement 9, Equitable Recovery, post-disaster housing decisions can often widen the gap between white communities and communities of color, with the former group gaining wealth post-disaster and the latter losing wealth.

Planning for post-disaster housing includes both understanding and predicting the community’s possible need and planning for the need to rapidly build new housing. This can often be done through prototyping single and multi-family housing units that can be quickly constructed. For example, New York City’s

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Department of Emergency Management developed a prototype for post-disaster housing and received funding from FEMA and support from the US Army Corps of Engineers to build the model and test the time efficiency of doing so. These sorts of tests are encouraged.

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6. Total Cost of Home Ownership/Rental	
Essential Requirements	Acceptable Evidence
a) The community provides utility bill assistance for low-income households. The community or local utility has programs to help low-income households with essential energy and water costs.	<ul style="list-style-type: none"> • The community maintains a list of grants, tax credits, mortgage guarantees, and/or any other forms of subsidy available from the state or federal government and/or utilities. • Evidence of efforts to generate funding such as bond issuance or working with local agencies to identify ways of leveraging funding to support housing resilience.
Enhanced Requirements	Acceptable Evidence
b) The community has undertaken initiatives to reduce the property tax burden on vulnerable homeowners.	<ul style="list-style-type: none"> • If permitted by state law, a local ordinance or statute providing a homestead tax exemption for a primary residence, phasing in property tax increases due to higher assessments. • Alternative similar initiatives helping vulnerable populations stay in their homes.
Exceptional Requirements	Acceptable Evidence
c) Targeted financial assistance is available to vulnerable populations to help low-income homeowners and renters achieve stable housing. d) The community generates innovative financing and funding for resilience building in housing.	<ul style="list-style-type: none"> • The policies have a broad-based and sustainable source of funding that allows them to assist a substantial fraction of the targeted population and provides sufficient assistance to allow them to live in neighborhoods with good education and employment opportunities.

Commentary:

Beyond paying the mortgage, the total cost of home ownership includes utility bills, property taxes, and routine home maintenance expenses. These costs beyond the mortgage can be challenging for low-income homeowners with a home cost that is a large percentage of their monthly income. There are multiple possible policy options communities can employ to help homeowners stay in their homes. Policies to provide reduced property tax burden and enhance availability of stable housing could include tax abatement/payment in lieu of taxes; loan or voucher programs; subordinated second mortgages; project-based housing choice vouchers; and/or cash grants. Each of those policies can be useful, and communities should select those that work most effectively with their existing policy framework and the specific needs of their community members.

One challenge communities may face meeting this requirement is providing sufficient funding for programs like loans/vouchers and/or tax abatement. One possible solution is to ensure increasing costs, such as rising property taxes, are phased in more slowly, to allow families time to stabilize their finances. This can allow the community to account for the needs of its members without placing an undue burden on small communities with limited funds for public programs.

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7. Insurance Coverage	
Essential Requirements	Acceptable Evidence
a) The community conducts comprehensive public outreach informing residents of the availability of insurance to cover risks present in the community, including the circumstances under which they could be denied recovery assistance if they do not purchase insurance.	<ul style="list-style-type: none"> Records of materials used in outreach, media entities through which materials were/are distributed, and contacts made with and outreach conducted through neighborhood organizations in every area of the community (including organizations of residents with primary languages other than English). All records should include dates of contact and actions taken by all participants.
Enhanced Requirements	Acceptable Evidence
b) Community programs reduce the cost of insurance for residents based on means testing.	<ul style="list-style-type: none"> Resolution, ordinance or other locally required legal mandate that authorizes and appropriates funds for an insurance premium assistance program (IPAP), including a sliding scale setting assistance amounts mandating the highest level of assistance for households with incomes at or below 30% of area medium income (AMI) and decreasing levels of assistance for residents up to 100% of AMI. <ul style="list-style-type: none"> The publication, on the community’s public webpage and at least annually through public service announcements and commonly used media, of comprehensive information advertising the IPAP and the application forms, identity of responsible public agency or office, and other materials necessary for a resident to apply for IPA. Resolution, ordinance or other locally required legal mandate that establishes a coordinated program that supports implementation of audits, retrofits and insurance savings based on undertaking such measures.
Exceptional Requirements	Acceptable Evidence
n/a	n/a

Commentary:

Insurance is an important risk transfer mechanism that can support rebuilding following a disaster event. Community-level activities that support underwriting based on reduced community-level risk are provided within the Buildings Benchmark (requirement 9). Efforts to encourage homeowners to secure insurance are covered within this Benchmark. An Essentially Resilient Community actively raises awareness on the availability of insurance, what various insurance products do and don’t cover, and the potential consequences of not obtaining insurance. In order to support widespread dissemination of such information and to assure that vulnerable populations in particular are aware, information on insurance should be provided in all languages spoken in the community and

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include information for both homeowners and renters. Insurance can contribute to rebuilding costs that are not covered by government assistance post-disaster. Insurance can be an important safety net in recovery—particularly for residents without access to capital to support rebuilding or quickly securing alternative housing. Additionally, given the tendency for more affordable housing to be located in more vulnerable areas, heavily cost-burdened residents may not be able to remain in a community post-disaster. However, the residents that can most benefit often do not have the resources to pay the premiums. In order to help protect access to affordable housing post disaster and the benefits of maintaining a workforce, an Enhanced Resilience Community provides premium assistance for residents who may not be able to afford insurance.

Notes:

8. Disaster Response / Continuity of Operations Plans (COOP)

Essential Requirements	Acceptable Evidence
a) The housing department(s) participates in the community-wide COOP plan. Community developers, tenants and tenant associations, and owners of affordable housing are encouraged to participate in the community's COOP plan.	<ul style="list-style-type: none"> ● A written COOP. This may be contained within a local government's COOP but must explicitly address the continuity of these functions. The COOP should be compliant with national standards (e.g. FEMA Continuity Guidance Circular, Feb. 2018).
Enhanced Requirements	Acceptable Evidence
b) The housing department(s) has adequately implemented responsibilities under the COOP, including designating resources for implementation of the plan. c) Community developers, tenants and tenant associations, and owners of affordable housing are participating in the COOP development.	<ul style="list-style-type: none"> ● Documentation summarizing compliance with the community's written plan along with documentation on how resources are designated to implement the plan. ● Documented compliance with FEMA, STEP, and BORP standards. ● A community-sponsored program to license disaster response personnel, including an appointed representative to oversee this work. ● Licensure of at least 25% (minimum of 1) of all disaster response personnel.
Exceptional Requirements	Acceptable Evidence
d) The housing department(s) is an active participant in FEMA, local, and regional emergency management exercises. e) Records are posted electronically to ensure that all potential stakeholders have the option to participate in the COOP development process and associated exercises.	<ul style="list-style-type: none"> ● Records of housing department(s) participation in emergency management exercises. ● Documentation of stakeholder-facing materials on COOP development and exercises.

Commentary:

While mitigating against disasters has been proven highly cost effective, many communities have not made the investments necessary to avoid most disasters—particularly the most extreme events. When a disaster or emergency happens, a community needs to be prepared to quickly recover. Part of that recovery includes rebuilding. Having the plans in place includes exercising them and also working with local partners, including local emergency management and other community groups representing the community in recovery. Having Continuity of Operation Plans already in place and well tested/exercised will ensure a smooth transition from response to recovery and assure the community that recovery will be happening even as response continues.

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As identified in the other Housing Benchmark Requirements, the availability of housing following a disaster is essential for getting the community “back to normal.” Therefore, the agencies with responsibilities for housing and the related stakeholder groups should identify the necessary criteria to address continuity of operations for the housing function and ensure that is recognized and integrated into the community’s COOP.

The Continuity Guidance Circular (02/2018) is based on whole community continuity. The whole purpose of the circular is to “enable communities and organizations to continue essential functions and provide critical services across a broad spectrum of emergencies when normal operations are disrupted.” The requirements set up a continuum of policies and practices that lead to effective development and implementation of the COOP along with agreements to facilitate outside support.

Notes:

9. Equitable Long-Term Recovery from Disasters

Essential Requirements	Acceptable Evidence
a) Post-event development plan actively prevents involuntary displacement of vulnerable populations.	<ul style="list-style-type: none"> ● Documentation of community policies requiring the following: <ul style="list-style-type: none"> ○ Damaged assisted housing be either rehabilitated in place or replaced one-for-one in a permanent location close by. This may be implemented by ordinance or through MOUs between the community and assisted housing owners. ○ The post-event development or replacement of housing provides an apportionment between rental and ownership units that matches the disaster caused losses of rental and ownership units to ensure that renters, and particularly lower income renters, are not forced to relocate out of their community. This must account for any abandonment of pre-disaster areas prone to repetitive loss. ● The jurisdiction has as part of its disaster recovery plan ensured that the rebuilding funded by the plan does not isolate affordable homes only in certain parts of the community by race/ethnicity or income and provides opportunities for households to choose to remain in pre-disaster neighborhoods or choose to relocate to a neighborhood of their choice, taking into account risk of future disasters.
Enhanced Requirements	Acceptable Evidence
b) The post-event development plan pursues an affordable housing strategy to meet the requirements of the enhanced provision in requirement 1. c) The post-event development of new housing (beyond original stock) provides an apportionment between rental and ownership units that matches the pre-disaster apportionment in targeted areas to plan for abandonment or rezoning.	<ul style="list-style-type: none"> ● The community has developed a program design that can be incorporated into its CDBG-DR Action Plan to use DR funds to create and support affordable housing for displaced households in their pre-event communities (but not in areas subject to repetitive loss), as quickly as possible after the event, and, where possible, provide housing options to households timing out of FEMA or other emergency or short-term post-event housing. ● The community's CDBG-DR, annual, and five-year plans incorporate planning for the development of additional rental and owner-occupied housing in areas not subject to repetitive loss.
Exceptional Requirements	Acceptable Evidence
d) The community engages in a long-term plan, including current residents in decision-making positions, to encourage the abandonment of at-risk areas and the development of new housing opportunities for households of all income categories in areas outside of anticipated inundation or hazard risk zones.	<ul style="list-style-type: none"> ● Evidence of an established buyout program and/or a phased abandonment plan/rezoning plan with significant community engagement.

Commentary:

This section seeks to both prevent the loss of existing subsidized affordable housing inventories and to recognize and encourage planning necessary to meet the pre- and post-disaster needs of all lower-income households in a manner that creates opportunities in rebuilding to increase the range of affordable choices outside of harms' way.

The need to preserve and increase affordable housing units is clear and disasters exacerbate the problem. The NLIHC found in "The Gap: A Shortage of Affordable Homes" that, nationwide, there are only 37 available, affordable units for every 100 extremely low-income families (https://reports.nlihc.org/sites/default/files/gap/Gap-Report_2019.pdf). A recent study released through National Public Radio observed that after disasters, homeowners are more likely to benefit than renters and while black residents lose wealth on average, white residents gain wealth (<https://www.npr.org/2019/03/05/688786177/how-federal-disaster-money-favors-the-rich>).

CDBG-DR grantees can both directly finance the rebuilding of the assisted inventory and affirmatively support the recreation and expansion of the entire affordable inventory in areas not subject to repeat disasters and in a broad range of neighborhoods. Equitable plans should create opportunities to rebuild in place and also create new inventory in neighborhoods of opportunity, taking into account the need to invest housing funding and rebuilding outside of dangerous disaster zones.

Notes:



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