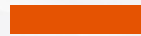


# Training for FEMA Practice: Individuals & Households Program



PEPPERDINE | CARUSO  
SCHOOL OF LAW

# FEMA

## Goals for this Training:

Equipping lawyers to volunteer for pro bono clinics and practice with a basic understanding of FEMA's Individual & Households Program;

Advising on preparing FEMA applications and appeals;

Advising on some basic insurance practice;

Sharing information and insights to help you and your pro bono clients with the next steps in a long process.

# FEMA

## Practice Notes:

Clients are in trauma and stress, exhausted and overwhelmed with information. Be patient. Listen to their stories.

Clients are capable of learning this on their own and handling their business. Our modest value is to orient and prepare them for the next three or four major decisions and steps.

We bear the burden of clear communication. Teach. Be patient. Be creative. Process and judgment are more important than expertise.

Set realistic expectations and give practical hope in grounded perspective. Our goal should be to empower, educate, and encourage clients to be their own best advocates.

# FEMA

## **FEMA assistance is not insurance.**

The Federal Emergency Management Agency is responsible for many components of national responses to disasters.

Individuals & Households Program provides specific assistance to assist with immediate, survival, and recovery needs. Its purpose is not to help people rebuild completely but to help with immediate needs and some uninsured or underinsured losses.

**Insurance comes first. FEMA does not cover insured losses.**

FEMA

## **Federal Emergency Management Agency**

Individuals & Household Program (IHP)

Serious Needs Assistance

Housing Assistance (HA)

Other Needs Assistance (ONA)

**Available after a Disaster Declaration.**

FEMA

FEMA DECLARATION for the 2025 Los Angeles  
Wildfires:

California Wildfires and Straight-line Winds  
DR-4856-CA

# FEMA Resources

**Federal Emergency Management Agency**

**[FEMA Road to Recovery Site](#)**

**[FEMA IHP Website](#)**

**[FEMA Application Site:](#)**

**[www.disasterassistance.gov](http://www.disasterassistance.gov)**

**[FEMA Disaster Recovery Center \(DRC\) Locator](#)**

**[FEMA Guidebook \(technical details\)](#)**

**[Updated March 2024 Regs](#)**

# FEMA IHP

## IHP:

### **General Eligibility:**

Losses in area declared a disaster area,  
Insufficient (or no) insurance coverage,  
Accepted assistance from all other sources,  
Necessary expenses or serious needs due to the disaster,

Any household member is US citizen, Legal Permanent Resident, or qualified alien.



# FEMA IHP

## Eligibility for Renters:

Renters are eligible for FEMA assistance!

The most common assistance for renters will address temporary housing and rental assistance and will help cover personal property and expenses not covered by insurance.

Common Problem: FEMA's online systems often only recognize one application per address, so a landlord's application can delay a renter's application. Do not give up! Call or go to a DRC in-person to explain and correct this with FEMA.

**Landlords:** FEMA assistance is for primary residences. Do not file a claim for investment property if it's not your primary residence without telling your renters. You will delay their support.

# FEMA IHP

## Serious Needs Assistance:

A one time payment of \$750 per household.

Immediate or critical needs are lifesaving and life-sustaining items, including water, food, first aid, prescriptions, infant formula, diapers, consumable medical supplies, durable medical equipment, personal hygiene items and fuel for transportation.

# FEMA IHP

## Basic Housing Assistance Categories:

- **Lodging Expense Reimbursement (LER):** Financial assistance to reimburse for hotels, motels, or other short-term lodging while an applicant is displaced from his or her primary residence. (Vouchers, direct payments to hotels, etc.)
- **Rental Assistance:** Financial assistance to rent alternate housing accommodations while an applicant is displaced from his or her primary residence. (Usually up to 6 months, often extended.)
- **Continuing Temporary Housing Assistance:** Need-based financial assistance when the applicant's permanent housing plan has not been fulfilled through no fault of the applicant.
- **Repair:** Financial assistance to repair an owner-occupied primary residence, utilities, and residential infrastructure, including privately-owned access routes (i.e., driveways, roads, or bridges) to a safe and sanitary living or functioning condition. (Safe, sanitary, habitable....)
- **Replacement:** Financial assistance to help replace an owner-occupied primary residence when the residence is destroyed.

# FEMA IHP

## Direct Housing Assistance:

- **Multi-Family Lease and Repair (MLR):** This program allows FEMA to enter into lease agreements with owners of multi-family rental property located in disaster areas and make repairs or improvements to provide temporary housing to disaster survivors.
- **Manufactured Housing Units (MHUs):** Manufactured homes provided by FEMA and made available to use as temporary housing.
- **Permanent or Semi-Permanent Housing Construction (PHC):** Home repair and/or construction services provided in insular areas outside the continental United States (U.S.) and in other locations where no alternative housing resources are available; and where types of housing assistance FEMA normally provides, such as Rental Assistance or other forms of direct assistance, are unavailable, infeasible, or not cost-effective.

# FEMA IHP

## Other Needs Assistance:

Funeral,

Medical,

Dental,

Childcare, and

Assistance for miscellaneous items such as chainsaws or dehumidifiers purchased or rented after the disaster.

# FEMA IHP

## Other Needs Assistance, continued:

Personal Property,  
Moving and Storage, and  
Transportation Assistance (even replacing  
destroyed vehicles).

**Note on SBA Loans:** In 2024, new FEMA regulations removed the previous requirement to apply for SBA loans for certain ONA awards. SBA loans are available and optional, and applications now are not necessary for ONA.

[\(March 22, 2024 FEMA Memo at 2\)](#)

# FEMA IHP

## Limitations:

### Insurance comes first.

([United Policyholders](#) is a rich resource for insurance issues.)

For fiscal year 2024, the maximum amount of financial assistance is \$42,500 for Home Repair.

IHP applications are due within 60 days of the declaration, often extended.

Appeals are due within 60 days of award letter, often extended.

IHP typically runs for 18 months after the declaration.

# FEMA IHP Application

## Applying for IHP: From the [FEMA Road to Recovery Site](#):

Before you apply:

1. Take photos of the damaged home and belongings for the client's own records
2. Make a list of damaged/lost items, which may be helpful when working with insurance or discussing losses with a FEMA inspector
3. Apply for insurance right away.



# FEMA IHP Application

## Applying for IHP: From the FEMA Road to Recovery Site:

### Getting Ready to Apply Online, the App, Phone, In Person;

Applicants should gather as much information as possible to document ownership and losses:

Photographs (especially before and after...),

Title docs,

Inventories,

Receipts (Keep them!),

Estimates (Get and keep them, often necessary),

Etc. (Be creative!)

# FEMA IHP Application

## Applying for IHP: From the FEMA Road to Recovery Site:

### Getting Ready to Apply Online, the App, Phone, In Person;

Applicants must have this information ready:

Social Security number

Annual household income

Contact information (phone number, mailing address, email address, and damaged home address)

Bank account information (if you are approved for disaster assistance, you may choose to have funds directly deposited to your account)

Insurance information (type of policy, insurance company name, etc.)

# FEMA IHP Application

## **Applying for IHP: From the FEMA Road to Recovery Site:**

[www.disasterassistance.gov](http://www.disasterassistance.gov)

### **After the application:**

Home inspection

Consider applying for SBA Disaster Loans

### **Receive the FEMA Award or**

**Receive a denial, which will usually explain the basis of the denial or insufficiency in the application.**

# FEMA IHP Application

## Appealing the FEMA Award for denial or insufficiency:

Within 60 days of receiving the decision letter, the appeal must include:

A signed letter explaining why you disagree with FEMA's decision.

Documents supporting your appeal such as receipts, verifiable contractor estimates, etc.

The disaster number, your FEMA application number, and your name on all pages you send to FEMA.

If the denial letter includes bases for the denial, address those first, directly, and completely.

# Insurance

## Insurance Advice:

- \* Insurance comes before FEMA assistance.
- \* Start a claim right away. Stay in close communication with agents and adjusters and reply promptly.
- \* Get a copy of your policy. Insurance is a contract. Read it. Understand it. Insureds are their own best advocate.
- \* Document everything. Make lists, take pictures. Keep receipts and invoices. Get estimates in writing.
- \* Keep all correspondence from the insurer. Do not rely on any representations that are not in writing.
- \* Ask questions to clarify technical explanations and jargon.
- \* Do not settle a claim until you are satisfied the insurance has fulfilled its obligations under the policy.

# Other Resources

## **Other Helpful Resources:**

[United Policyholders' 2025 California Wildfires Insurance Claim and Recovery Help](#)

[Morrison Foerster's 2021 California Wildfires Helping Handbook: A Resource for Individuals, Families, and Small Business](#)

Advocates for Disaster Justice / ProBonoNet:  
[FEMA Appeals FAQs](#) and [Self-Help FEMA Appeal Guide](#)

# Summary

## Summary Advice for Neighbors and Clients:

1. Start with insurance: Open a claim and keep in touch with your agent or adjuster.
2. Document everything: Take notes, make lists, take pictures. Read your policy. Keep all correspondence from the insurance company. Keep invoices and receipts. Get estimates in writing.
3. File for FEMA IHP Assistance: Focus on items and losses not covered by insurance or insufficiently covered by insurance. Apply by category with as much information and documentation as you have.
4. Do not give up if you receive a FEMA denial; it may need more information or documentation or may need more time for insurance decisions.