



Disaster Assistance Program

Frequently Asked Questions

11/26/24

The use of the term Effective Useful Life throughout the program information. Why is that even in the application? It is a vague concept. It states that a window repair has to have a useful life of ten years. How is that measured?

This is measured with the physical onsite inspections by ensuring the products, materials, systems and equipment are provided, installed and or repaired in accordance with the manufacturers requirements.

The lead-based paint information is still vague on whether you have to follow it or not. This is going to be a bottleneck in the process.

The Lead Based Paint RRP regulations are governed by the EPA, not SC Housing. These regulations are applicable to DAP projects. For guidance, please refer to pages 42-43 in the following, for Frequently Asked Questions (FAQs) related to Emergency Renovations:

https://www.epa.gov/system/files/documents/2023-10/full_lead_fqs_october_28_2023.pdf

Cost Reasonableness: If you are within the 2025 Construction Cost Sheet guideline, you should be deemed to be cost reasonable?

Yes, that would be correct. In addition, cost reasonableness can be met by procuring and selecting the lowest most responsive and responsible bidder.

Building permits: There are some localities that may not require a building permit for a roof replacement. Some localities may only require a permit if you are adding square footage.

SC Housing is aware of this; and therefore, requires the Unit of Local Government (ULG) to provide a link to the localities building code requirements. Each awarded DAP Applicant will have documentation requirements that differ based on what is required by the locality.

Drywall repair: "Ceiling repairs shall be finished/painted at the repair only." You mean you cannot even paint the entire ceiling in the room where the damage occurred?

Yes, you can paint the ceiling of the effected room in which the repair took place.

“Painting color shall be of a base white color.” Does SC Housing mandate the color of paint?

Yes, any shade of basic white is allowable.

3 year warranty? Why? Will not be able to get contractors.

This is no longer required and has been updated. Please see DAP Bulletin #1

Do the primary property owner(s) have to have homeowner’s insurance or do they not have any homeowner’s insurance?

No, property or homeowner’s insurance is required.

DAP question regarding mobile homes. Will there be an age limit of 25 years of age, as in the Critical Home repair and Home Repair programs?

There will be no age restriction on mobile homes.

What we’d like to do is handle the program under the auspices of a subrecipient agreement with a non-profit organization. This is how we handle the HOME Owner Occupied Repair program and it works well for a jurisdiction like mine, which doesn’t get CDBG entitlement funds and so lacks in-house capacity to directly run a housing support program. The 15% project fee would not be enough for us to justify county resources, but it would efficiently leverage non-profit resources. Is this allowed?

Yes. The use of experienced, qualified non-profit organizations is allowable under the DAP program.

We’d probably approach the program like this: focus DAP solely on roof/”in-the-dry” work. We’d handle any other necessary work a house might need through HOME Owner Occupied Repair program funding, completely separated from DAP scope of work.

Focusing on roof replacements only is acceptable and supported. Please be aware that SC Housing roof repairs include the roof, fascia, soffit, siding and trims if or as necessary as a complete roof repair. Please see Appendix A, Section VII., E. for further information.

We’d really like some clarification on SC Housing’s expectations for lead-based paint/asbestos testing and abatement under DAP. Many of our Owner-Occupied Rehab partners are uncomfortable with lead based paint/asbestos requirements.

The Lead Based Paint RRP regulations are those of the EPA not SC Housing. These regulations are applicable to the DAP program. For guidance please refer to pages 42-43 in the attached link for the EPA Lead Based Paint Program Frequent Questions:

https://www.epa.gov/system/files/documents/2023-10/full_lead_fqs_october_28_2023.pdf

Regarding asbestos requirements for DAP, homes that do not meet DHEC's exemption requirements must comply with asbestos regulations. Private residential structures of 4 or less unit, according to 61-86.1 are exempt unless the following is occurring:

- Work is being performed on multiple structures within a compact area (City Block) under the ownership/control of a single owner and/or operator (i.e. using the same contractor to do rehabilitation on more than four private residences located within a "City Block" within a 1-year period would trigger compliance with DHEC asbestos regulations. ULGs should contact DHEC directly to determine whether a project is subject to asbestos regulations if they are unsure.

Regarding use of DAP for insurance deductibles and/or gaps—how would this work? Let's say insurance covers \$20,000 in damage after satisfaction of a \$5,000 deductible. Would the contractor bill \$5,000 to DAP and bill the homeowner for the outstanding insurance amount?

The DAP recipient (government entity) is responsible for invoicing all program costs. Regarding insurance deductibles or gaps, the homeowner would provide documentation to the ULG demonstrating the gap in insurance; or, amount of the deductible. The ULG would then invoice SC Housing for that amount. Payments will not be made directly to the contractor from SC Housing.