Mr. James G. Featherstone
Chairman, National Advisory Council
City of Los Angeles, Emergency Management Department
200 North Spring Street, Room 1533
Los Angeles, CA 90012

Dear Mr. Featherstone:

Thank you again for the National Advisory Council’s (NAC) recommendations for the National Disaster Housing Task Force (NDHTF) Practitioners’ Guide to Disaster Housing. Having reviewed and considered this feedback, the NDHTF and I are prepared to follow up on and respond to your recommendations.

The intent of the Practitioners’ Guide is to provide guidance to State, Tribal, local, and territorial disaster housing assistance practitioners for the purpose of developing strategic plans that improve responsiveness and resiliency. The Practitioners’ Guide is designed to help establish the roles and responsibilities of stakeholders during both declared and non-declared disasters encourage the involvement of private sector and non-governmental agencies, identify program options and the appropriate actions for implementation and include operational guidance on establishing a State-led Disaster Housing Task Force (SLDHTF). The Guide is a companion document to the NDHTF Concept of Operations (CONOPS), which defines the roles, programs, and authorities of Federal agencies; details shared responsibilities; and emphasizes the cooperative efforts required to provide disaster housing assistance.

The National Disaster Housing Strategy places responsibility for many disaster housing decisions with the States. The NDHTF was concerned that the NAC recommendations, as written, promote a prescriptive document that would not offer flexibility nor encourage States to develop the individual disaster housing strategies that are appropriate for their unique circumstances. A follow-up call with the Chair of the NAC National Disaster Housing Working Group provided clarification. Responses to the individual NAC recommendations are as follows:

**Recommendation 1:** Revise the Practitioners’ Guide to provide a comprehensive, operational, self-contained, and user-friendly guide for its intended audience.

**Response 1:** The NDHTF will revise the Practitioners’ Guide to provide additional operational planning guidance and templates that will emphasize adaptability for each community’s particular risks and demographics. The CONOPS will remain a separate document intended for a Federal audience. Both documents will be available on the National Disaster Housing Resource Center, a self-contained, comprehensive, and content-searchable Website on disaster housing.
**Recommendation 2:** Add operational detail to the Practitioners’ Guide from other NDHTF products to identify a National Incident Management System (NIMS) compliant command structure for post-disaster housing operations; establish roles and responsibilities for specific Federal agencies; incorporate “unity of effort” within a defined structure; foster a single location where participants operate under a NIMS compliant structure; and describe the most effective federal programs in the National Disaster Recovery Program Database (NDRPD) that may make up a menu of disaster housing options, listing funding levels, eligible recipients, and timing of program availability.

**Response 2:** The themes outlined in the National Response Framework (NRF), as they apply to disaster housing, are reinforced by NDHTF documents. Additional information about Multiagency Coordination Systems, unity of effort, and NIMS will be added. The roles and responsibilities of Federal agencies are described in the CONOPS, but material can be incorporated into the Practitioners’ Guide to emphasize unity of effort. Recommendations as to a location for SLDI-ITF operations can be added, but as a State-led entity, this ultimately will be determined by the State. Regarding the NDRPD suggestions, data on funding levels and duration is not available as this information will vary based on the size and scope of the specific disaster and the characteristics of the community affected. Information about target audiences and eligible recipients is currently included in the database.

**Recommendation 3:** FEMA and the Department of Housing and Urban Development (HUD) should develop a national solution to post-disaster interim housing. The Practitioners’ Guide should describe in detail the pre-event role of each Federal agency to identify interim housing designs for rural, suburban, and urban communities; approve interim housing manufacturers; and articulate the capacity of each agency to build interim housing.

**Response 3:** FEMA and HUD are currently evaluating options for interim housing strategies. Once we have completed this process, including engagement of our partners, the Practitioners Guide will be updated appropriately.

**Recommendation 4:** The Practitioners’ Guide must describe which Federal agency has the responsibility to foster the creation of SLDHTFs, ensure their viability, and support them.

**Response 4:** As described in the Practitioners’ Guide, FEMA regional offices work with States to assist in the creation and ongoing development of SLDHTFs. The NDHTF is also working with FEMA’s National Preparedness Directorate to produce a technical assistance package to provide additional support to create or strengthen SLDHTFs. The Federal government strongly encourages States to adopt and support a task force. However, as a State-led entity, the creation and viability of the SLDHTF is ultimately a responsibility of each State, not the Federal government.

**Recommendation 5:** Ensure consistency between the Practitioners’ Guide and the NRF as each relates to issues of “unity of effort.”

**Response 5:** As per Response 2, additional information about unity of effort will be added to the Practitioners’ Guide.
The Practitioners' Guide was drafted with input from emergency managers and housing specialists in the field and in regional offices, as well as input from NDHTF partner agencies. It reflects a desire by most practitioners to allow for local interpretation in determining the disaster housing solutions that are best for their respective needs. The NDHTF will incorporate the NAC recommendations into this approach in order to provide additional detail and operational guidance, while maintaining support for State-driven disaster housing strategies.

I very much appreciate the NAC's thoughtful comments on the draft Practitioners' Guide and fully expect that they will strengthen the final product.

Sincerely,

W. Craig Fugate
Administrator