



FEMA

April 16, 2019

MEMORANDUM FOR: W. Nim Kidd
Chairman, National Advisory Council

FROM: Pete Gaynor 
Acting Administrator

SUBJECT: Response to November 2018 National Advisory Council
Recommendations

This memo outlines the Agency response to the December 10, 2018 recommendations from the National Advisory Council (NAC). I appreciate NAC's support of FEMA's Strategic Plan and its counsel as we work together to build a culture of preparedness, ready the nation for catastrophic disasters, and reduce the complexity of FEMA.

I discussed NAC's recommendations with my senior staff and provided direction on ways to incorporate and implement the advice where applicable. As FEMA continues to deal with above average disaster activity, your recommendations are a key tool to prioritize staff efforts within the Agency. Like you, I am committed to making our programs, both Individual and Public Assistance, easier for disaster survivors as well as communicating with all appropriate stakeholders to build a culture of preparedness. I also know we still have a long way to go to meet the mitigation funding need, including combining federal funding streams for the same project.

The attached document provides more detail on all issues identified in the recommendations. In some cases, FEMA took immediate action to implement the NAC's recommendations, while in other cases it will take more time or the Agency is already working on the issue. For example, the Federal Insurance and Mitigation Administration (FIMA) is setting up a recurring call with the National Association of Insurance Commissioners based on NAC's feedback on the importance of working with partners across the whole community. The Agency is also working toward standardized metrics for disaster impacts, including partnering with the National Academy of Medicine to look at measuring mortality and morbidity over the next two years.

Your insights into our programs are vital to sustained improvement in emergency management. I look forward to the May 2019 meeting and our continued work together.

cc: Daniel Kaniewski, Deputy Administrator, Resilience
Jeffrey Byard, Associate Administrator, Office of Response and Recovery
Jessica Nalepa, Associate Administrator, Office of External Affairs
Joel Doolin, Associate Administrator, Office of Policy and Program Analysis

Attachment: Programmatic Updates Related to November 2018 NAC Recommendations

Programmatic Updates to the November 2018 NAC Recommendations

ISSUE 1: INCONSISTENT AND INACCURATE FLOOD MAPPING

The National Flood Insurance Program (NFIP) relies on flood mapping and data that are not always uniform and can be subjective. The lack of standard results weakens FEMA's ability to assess actual flood risk for the ~22,000 communities that participate in the NFIP.

Recommendation 19-01: FEMA should partner with the Whole Community (universities, insurance industry and risk modelers, NOAA/NWC, USGS, National Academies, etc.) to create a set of standards and uniform approach of identifying flood hazards and producing flood risk maps.

FEMA Response: FEMA works hard to ensure that the methods employed in flood risk studies are scientifically and technically appropriate, the engineering practices meet professional standards, and the results are accurately represented on Flood Insurance Rate Maps (FIRMs) and associated products. Floodplains nationwide are both unique and dynamic, and FIRMs that depict them represent a snapshot in time. The FEMA flood hazard analysis and mapping standards and associated guidance are published, vetted, peer reviewed and updated on a regular schedule to ensure they are aligned with current best practices. FEMA's mapping standards allow for a uniform approach to flood hazard identification that also allow for needed flexibility to address unique characteristics specific to certain localities.

During the regularly scheduled updates of these mapping standards and guidance, key stakeholders and the public are informed of the planned changes and given an opportunity to comment through an open public review process. FEMA uses the annual maintenance process as the mechanism to develop and implement changes that address recommendations from important stakeholders, such as the Technical Mapping Advisory Council (TMAC).

TMAC has been tasked by Congress to provide mapping advice to FEMA and has representation from the larger mapping community, including Other Federal Agencies (OFAs), stakeholders in the mapping industry, local mapping partners, and academia. TMAC has provided insight to FEMA in the form of recommendations, many of which have been implemented as Mapping Standards and/or guidance. In the 2016 TMAC report entitled "National Flood Mapping Program Review," TMAC summarized their review of the FEMA guidance and standards as well as the maintenance process for each and concluded that the "National Flood Mapping Program, when applied as designed, supplies technically credible flood hazard data in areas where Flood Insurance Rate Maps are prepared or updated."

FEMA Action: Looking ahead, FEMA will continue to explore ways to better deliver trusted, actionable, and more comprehensive flood hazard and risk information based on feedback from internal and external stakeholders. As is the case today, any changes to how FEMA identifies and communicates flood hazard information will be closely coordinated with OFAs, local, state, territorial, and tribal officials, industry, and academia.

ISSUE 2: EXPAND READY.GOV WITH RISK DATA SETS

One reason individuals do not take adequate preparedness actions is that they do not understand the risks they are vulnerable to.

Recommendation 19-02: The Administrator should encourage additional partnerships to expand Ready.gov. The expansion should include location-based data sets to allow citizens easy access to accurate, applicable and historical information about their specific threats and hazards.

FEMA Response: For decades, FEMA has actively educated the public on risk and hazard vulnerabilities, advocated for behavior change relevant to disaster and emergency preparedness, and sought to increase and expand its preparedness partnerships. The Ready.gov (Ready) platform is one successful outreach effort FEMA uses to build, sustain, and reach new partnerships to help communities understand risk awareness and encourage the public to learn protective actions.

To help individualize critical messages, Ready showcases area-based risks. Ready often partners with state organizations so each state or regional area can highlight their biggest risk factors and how citizens there can prepare or mitigate against those hazards. FEMA pursues a dual track in preparedness promotion; advocating for “all-hazards” preparedness messaging and providing a broad assortment of resources and materials that are hazard-specific. For example, FEMA has worked for many years to promote flood hazard awareness and educates the public about flood vulnerability.

FEMA Action: Moving into the future, Ready intends to leverage existing relationships with the US Census Bureau and the American Red Cross. These new enhanced partnerships will allow FEMA to benefit in areas where those organizations’ research shows multiple at-risk points to identify risk-vulnerable areas for targeted messaging and partnerships.

The results of the [2017 National Household Survey](#) show that more Americans are actively preparing for disasters. A summary of findings indicates that:

- **92 percent of people who took the survey** said they took at least one step listed in the survey to prepare. That’s two percent more than last year’s results.
- **46 percent** took three or more actions to prepare.
- **79 percent** said they have enough supplies to go three days without electricity or running water.

In 2017-2018, FEMA distributed 15 hazard-specific information sheets about the following topics: active shooter, avalanche, cyberattack, earthquake, extreme heat, flood, hurricane, landslide, power outage, thunderstorm, tornado, tsunami, volcano, wildfire, and winter storm. These fact sheets help promote easy to understand protective actions by using plain language and user-friendly icons to depict actions. This same content was incorporated to update the Ready online hazard information content.

Previously, in 2016-2017, to help share with the public the hazards posed by natural disasters, the Individual and Community Preparedness Division and the Office of External Affairs collaborated on a series of easy-to-understand hazard preparedness videos: When The Sky Turns

Gray (tornado); When The Ground Shakes (earthquake); When the Fire Starts (wildfire); When the Clouds Form (flood); and When the Waves Swell (hurricane).

Related to this recommendation (19-02), in recognition that data sets will greatly assist the general public in raising awareness of the nature and scope of the risks they may face, Ready intends to work with subject matter experts across the Agency to support presentation of refined risk data sets, when they become available, through an online portal.

ISSUE 3: FEDERAL FACILITY RISKS & HISTORIC DATA

Communities are unwilling to publicize the risks to which they are vulnerable. FEMA and its federal partners should lead by example.

Recommendation 19-03: The Administrator should partner with other federal agencies to publish a view of the current risk across federally owned or managed assets and encourage additional partnerships with federal entities that demonstrate hazards (such as high watermark projects).

FEMA Response: The General Services Administration (GSA) is the federal government's leasing agent and, in most cases, the construction agent. During solicitation, GSA requires proposals to include whether a property is in a 100-year flood plain, 500-year flood plain, or not located in a flood plain. The proposal must also note whether the building(s) meet all seismic requirements, some seismic requirements, or no seismic requirements according to applicable building codes in the locality.

This information is used in the evaluation process to ensure that the government does not rent high-risk facilities. When GSA is constructing a government-owned facility, the intent is that no buildings shall be built within the 100-year flood plain. Exceptions must be approved by the Public Building Services (PBS) Assistant Commissioner for Portfolio Management and by the Chief Architect.

If the building location is approved, mechanical and electrical equipment rooms must be located 1500 mm (5 feet) above the level of the 100-year flood plain. This requirement ensures that only in rare circumstances, when there are no other viable options, would GSA approve building in a flood plain.

FEMA Action: FEMA will continue to work with GSA and other stakeholders to ensure that the risks and hazards of federally owned or managed assets are used in the evaluation process when obtaining facilities.

ISSUE 4: TIERED INSURANCE OPTIONS

Current insurance options do not meet the needs of consumers. More varied options would help close the insurance gap.

Recommendation 19-04: The Administrator should explore the facilitation of tiered micro or parametric insurance for both homeowners and renters. These tiered policy options should clearly explain their intent and limitations while explaining local, state and federal recovery responsibilities and the family role in recovery (i.e. to purchase an appropriate level of flood insurance).

FEMA Response: The FEMA Strategic Plan Objective 1.2 team is exploring different insurance options like tiered micro insurance and parametric insurance.

FEMA Action: NFIP is currently considering changes to policy forms and flood policy options, as more options can create better acceptance by policyholders and greater understanding of the product.

ISSUE 5: RESILIENCY TAX CREDIT

Tax credits are an effective incentive for behavior and should be applied to disaster resilience efforts.

Recommendation 19-05: The Administrator should explore and promote the concept of a state-based Resiliency Tax Credit (similar to the Residential Energy Efficiency Property Credit) for mitigation measures and the purchase of flood and potentially for fire or other insurance policies by homeowners, renters and businesses.

This concept should be explored for use at the state level for feasibility for all hazard mitigation and flood policy purchases.

FEMA Response: Some states have pursued a tax credit approach, which offers an incentive for mitigating structures to reduce hazard impacts and reduce insurance costs. Given the intricacies of federal and state tax codes, this idea is best pursued by states where they can align the requirements to the specific hazards affecting the state and the fiscal conditions in their jurisdictions. FEMA currently highlights success stories from states that have a resiliency tax and will continue to promote how the idea has worked for some states.

For insurance, a similar process/model is available for health insurance. Currently, the Premium Tax Credit (PTC) provides a refundable credit that helps eligible individuals and families cover the premiums for their health insurance purchased through the Health Insurance Marketplaces. While this would not be tax based, it could provide a similar incentive and reduction in cost.

For mitigation, Virginia proposed and passed an amendment to the state constitution in 2018 that authorizes the General Assembly to allow localities to provide a partial tax exemption for real property that is subject to recurrent flooding if improvements have been made on the property to address flooding. The General Assembly and participating localities would be allowed to place restrictions or conditions on qualification for the tax exemption.

FEMA Action: Mitigation can explore further opportunities to socialize, educate, and perform outreach on this topic and encourage adoption of similar statutory changes in other states.

ISSUE 6: MITIGATION INVESTMENT

There is not currently a way to capture local investments in mitigation, especially for those investments outside the traditional emergency management umbrella. This makes it impossible to track mitigation and much harder to incentivize it. This is a clarification of recommendation 18-14 related to the need for centralized mitigation investment documentation.

Recommendation 19-06: FEMA should work with SLTTs and private partners to launch a portal to encourage local, state and tribal governments to upload their mitigation projects. Potential incentives might be considered for those governments documenting mitigation projects.

FEMA Response: FEMA is working with external partners – such as the Pew Charitable Trusts’ research on state mitigation investments and the Natural Hazards Center’s proposal to match projects with investors – to find the best ways to collect and share information externally.

The Mitigation Framework Leadership Group (MitFLG) is also developing the National Mitigation Investment Strategy (NMIS) upon the recommendation of the Government Accountability Office (GAO-15-515). NMIS aims to identify, prioritize, and guide investments in pre- and post-disaster resilience and hazard mitigation-related activities, and tracking investments is a key aspect. NMIS will be risk-informed; grounded in data; and incorporate territorial (SLTT) and private-sector perspectives.

To support NMIS goals, implementation teams are being created and will be responsible for identifying and promoting investments in mitigation that are especially effective in achieving these goals.

The implementation teams will be an ongoing effort with rotating and overlapping membership that continuously researches, develops, identifies, promotes, guides, and measures the effectiveness of transformative and integrative mitigation initiatives nationwide. There are five sub-teams that focus on Non-Governmental/Private Partnership, SLTT Initiatives, Interagency Cooperation, Data Collection & Substantiation, and Communications/Reporting.

All data collected are stored in an online database on FEMA’s internal SharePoint, which is not publicly accessible. FEMA, along with NMIS implementation teams, will explore the best ways to identify, collect, store, and share data on mitigation investments.

FEMA Action: FEMA continues to work with SLTTs and private entities to collect data on mitigation projects to identify the best ways to share data on mitigation investments.

ISSUE 7: ENGAGING AND LEVERAGING DIVERSE COMMUNITIES REQUIRES A MULTI-LINGUAL APPROACH

Not all communities can access preparedness materials in a language or format they can understand.

Recommendation 19-07: FEMA should ensure that preparedness materials are readily available for distribution and download, where appropriate, in multiple languages and alternative formats for people with disabilities and others with access and functional needs ensuring the needs of the whole community are met. This may include braille, large print, ASL, national pictograms, etc.

FEMA Response: FEMA takes its legal responsibility to provide life-saving accessible information in plain language to the public, including printed materials in more than 200 languages, Braille, and large print as a high priority. Video products that are produced include captioning (multilingual), American Sign Language (ASL), and audio description and are accessible on FEMA’s website.

FEMA has also increased the availability and visibility of preparedness brand, materials, and messages through its Ready.gov and Listo.gov (Spanish-version of Ready.gov) pages. In 2018 alone, Ready.gov web pages had 15,553,549 views, and Listo.gov had 432,907 views.

Preparedness information and materials are also readily available in more than 10 other languages besides English and Spanish.

Although strong progress has been made, we are striving to increase accessibility even more. Over the last year, FEMA provided translations in 18 languages and delivered more than 700 translated documents in support of requests across various disasters.

During the last two years, FEMA staff has worked to include an American Sign Language interpreter on several pre-scripted videos to update the video library and FEMA's YouTube page. The Ready Campaign partnered with the US Fire Administration to leverage their pictogram contract to develop hurricane preparedness materials in a pictogram format and will continue to look for opportunities to expand this capability further in meaningful ways.

Additionally, the FEMA Puerto Rico Facebook page routinely posts preparedness information in Spanish for not only Puerto Rico but also all Spanish-speaking audiences. This included a major 2018 hurricane awareness campaign.

FEMA's Community Partners Branch in Intergovernmental Affairs works with over 100 organizations whose constituencies include diverse populations who require products and materials in various languages. We can support this recommendation by further increasing our distribution of preparedness materials in multiple languages and utilize their relationships with these populations and increase preparedness in these communities. In fact, preparedness publications in seven top tribal languages have been produced and will be posted on fema.gov by summer 2019.

FEMA Action: Although there is still much that can be accomplished in this area, FEMA has and continues to commit resources to expand language and accessibility capability to preparedness materials. FEMA continues implementing recommendations to include translation, distribution and online posting of preparedness materials that are easy to understand.

ISSUE 8: PREPAREDNESS METRICS

Engaging and leveraging diverse communities requires inclusive surveying techniques.

Recommendation 19-08: FEMA should reexamine the design of the National Preparedness Survey and ensure it is representative of the nation's population, including multi-lingual, underserved, under-represented, and marginalized communities.

Recommendation 19-09: FEMA should partner with other national organizations to conduct inclusive surveys and share preparedness survey results.

FEMA Response: FEMA's National Household Survey uses a representative sample of the US population that includes multi-lingual, underserved, under-represented, and marginalized communities. FEMA conducts the annual National Household Survey through a random sampling of roughly 5,000 respondents to include 2,000 national respondents and six targeted samples of roughly 500 each from areas with hazard histories or risk. The survey is conducted via telephone (both cell and landline) and is administered in Spanish, when needed.

Demographic survey data shows that respondents include individuals who could be classified as underserved, underrepresented, or marginalized. Accordingly, current survey methodology does not provide a representative sample of the US population. The National Household Survey provides data for metrics in the Quadrennial Homeland Security Review, the National Preparedness Report, and a number of internal strategic documents. FEMA will continue to assess the demographic data to ensure continued representation of the US population. In addition to the National Household Survey, FEMA conducts targeted surveys in traditionally underserved, under-represented, and marginalized communities to enhance understanding of the behaviors and attitudes in those communities.

FEMA Action: Each year, FEMA publishes and shares the results of the National Household Survey with key partners and stakeholders. Maintaining consistent methodology allows FEMA to continue providing reliable and valid longitudinal analyses not only for our own metrics but also for use by our partners. FEMA will continue to seek additional partners and leverage existing partners including the Center for Disease Control and Prevention (CDC), American Red Cross, and Affirmers of the National Strategy for Youth Education, to enhance the collective understanding of the preparedness-related behaviors, attitudes, and characteristics of the US population.

FEMA's Community Partners Branch in Intergovernmental Affairs works with over 100 organizations whose constituencies include diverse populations who require products and materials in various languages. Where practical and allowable, we can work with these organizations to partner on inclusive surveys and share preparedness results.

ISSUE 9: BUILDING A CULTURE OF PREPAREDNESS WITH LOCAL COMMUNITIES AND PARTNERS

Communities with the strongest social ties recover the fastest after natural and man-made disasters. FEMA can support local communities in building social ties in two phases of the disaster management cycle: preparedness and recovery.

Recommendation 19-10: FEMA should work with relevant external stakeholders, such as NACo, NLC, IBHS and NAIC, to create social cohesion and groups focused on long-term recovery that enhance resiliency.

FEMA Response: FEMA's National Preparedness Directorate builds national level partnerships with organizations that have strong roots at the local level. Partnerships with stakeholders such as Extension Disaster Education Network (EDEN), 4H and the American Red Cross ensure that social cohesion can be built out directly in local communities through preparedness programming that is vetted by subject matter experts and delivered to disaster survivors through a trusted community agent.

To build capacity and resilience of community-based organizations, FEMA's Individual and Community Preparedness Division (ICPD) partners with relevant external stakeholders to reach the goal of building a culture of preparedness.

As stated in Objective 1.3 (Help People Prepare for Disasters) of FEMA's 2018-2022 Strategic Plan, ICPD and its partners are working to train a total of 22,000 community-based organizations with 65 percent reporting they have taken action with disaster continuity planning.

ICPD and its partners are also working to improve financial literacy in the US by achieving a total of 16 percentage point increase above the 2018 baseline of respondents who answer that they have set aside money for emergencies.

Under the framework of these two goals, ICPD has identified key public and private sector stakeholders to build stronger social ties in preparedness and recovery across the nation. Through a partnership with the Association of Financial Counseling and Planning Education (AFCPE), ICPD and AFCPE are developing training, resources, and tools for financial professionals that will help them prepare their clients for emergencies and disasters. Once completed, these resources will be available to financial professionals throughout the country.

ICPD is also working to amplify financial preparedness messaging efforts through partnerships with the Consumer Federation of America (CFA) and the interagency Financial Literacy and Education Commission (FLEC) via national communications campaigns like America Saves Week and Financial Capability Month, respectively.

FIMA is also working to establish a recurring regular call/meeting with the National Association of Insurance Commissioners (NAIC) to better facilitate information sharing and to discuss insurance issues.

FEMA Action: FEMA continues to work with relevant external stakeholders to create social cohesion and groups focused on long-term recovery that enhances resiliency.

ISSUE 10: LEVERAGING DIGITAL COMMUNITIES TO EXPAND THE CULTURE OF PREPAREDNESS

Better communication efforts could help drive preparedness activities more effectively. This is a clarification of the recommendations previously made related to preparedness messaging within recommendations 18-23, 18-24, and 18-25.

Recommendation 19-11: FEMA should engage with large scale digital communities, online influencers and other private partnerships to co-brand and echo emergency preparedness messaging. The Ad Council and Ready.gov preparedness strategy should be enhanced further by partnering with successful media outlets and non-traditional influencers, i.e. YouTube's Creators for Change, Yellow Co.

FEMA Response: FEMA continues to use the Ready brand to expand the exposure of preparedness initiatives, including financial preparedness, closing the insurance gap, and readying the nation for disasters. There is also an opportunity for further discussion between NAC and FEMA because the Agency is expanding the Ready digital/social presence to better focus on resilience. Since 2003, Ready and the Ad Council have been working together developing public service announcements that raise awareness of planning for emergencies, creating a family emergency communication plan, assembling supplies needed for power outages

and evacuations, signing up for wireless emergency alerts, and understanding that you can plan for a disaster.

In the past two years, outreach has pivoted to digital platforms including the Facebook Messenger Bot and Facebook [videos](#) (Scary Simple, Disasters Don't Plan Ahead, Recipes for Disaster, and Disaster Tips, with short digestible preparedness tips targeted for delivery on mobile phones).

FEMA Action: This year, for the National Preparedness Month campaign, Ready is focusing on youth preparedness, working through the Ad Council with a leading company to emphasize digital design and outreach.

Ready also looks to establish strategic partnerships to expand the reach of targeted messaging. For instance, Ready partnered with the American Association of Retired Persons (AARP) to leverage successful, far-reaching platforms and their understanding of how to message and reach older Americans with timely preparedness information. AARP further supports those efforts through their digital channels which offer significant message amplification.

Ready partnership leverages social responsibility at all levels including, within the digital community, yearly free digital advertising opportunities with the Ad Council. The Ready Campaign also plans to expand its outreach to youth, parents, caregivers and educators via Youth Preparedness Council members. We will also consult with select National Strategy Affirmers to help us draft messages and new content for the Ready Kids website. The Affirmers are strong partners for amplifying FEMA's preparedness messaging for youth.

ISSUE 11: RESILIENCE IMPACT METRICS

There is not an agreed upon set of data which emergency management, as a field, can use to compare the results of different projects and programs to see which are most effective.

Recommendation 19-12: FEMA should identify and provide their definition of "resilience" with consideration to infrastructure, assets and human needs to develop standard metrics for consistent measurement. FEMA should draw on existing resources and knowledge bases to align with current national efforts.

Recommendation 19-13: The Administrator should partner with relevant organizations such as NIH, CDC, NIST, NSF, NAS, academia, and others to develop a suite of standardized metrics for disaster impacts.

These partnerships, and the products they produce, have the dual purpose of reducing complexity and preparing for catastrophic disasters by better understanding and predicting the impacts of disasters on communities.

FEMA Response: When FEMA formed the Resilience organization last year, the Agency also stood up a working group up to, among other things, recommend a definition for resilience. A comprehensive literature review was conducted of resilience definitions and the working group is currently proposing to adopt the National Institute of Standards and Technology (NIST) definition for resilience: *"the ability to prepare for anticipated hazards, adapt to changing conditions, and withstand and recover rapidly from disruption."*

Additionally, the Disaster Recovery Reform Act (DRRA) requires FEMA, in consultation with federal departments and agencies, to define the terms *resilient* and *resiliency*. This definition will specifically apply to Section 406 Public Assistance (PA) permanent work. As required by DRRA, the permanent definition will go through notice and comment rulemaking.

FEMA Action: Recently, FEMA took initial steps toward identifying standardized metrics for disaster impacts in coordination with federal, interagency, SLTT, and urban area partners, with emphasis on how these metrics could assist with analysis of community and national preparedness. This year, FEMA's National Preparedness Assessment Division (NPAD) created a set of standard disaster metrics as part of its jurisdictional Threat and Hazard Identification and Risk Assessment (THIRA)/Stakeholder Preparedness Review (SPR) update and the National THIRA (NTHIRA) methodology development. The impacts are aligned to Community Lifelines and allow jurisdictions to directly connect their projected impacts and planning factors to their estimated capabilities, allowing them to track performance against goals. Jurisdictions submitted their first data on December 31, 2018 and NPAD is analyzing this data now.

We agree that standardized metrics are critical to determining the success of preparedness and risk reduction. Although this is a first step toward identification and utilization of standardized metrics for planning and preparedness efforts, there is still much work to be done to ensure jurisdictions at all levels are actively collecting and sharing disaster impact data in standardized formats. As an initial step toward better understanding data collection and information sharing requirements, FEMA is partnering with the National Academy of Medicine to study standardized approaches to measuring mortality and significant morbidity for major disasters, as required by DRRA Section 1244. This two-year study will explore data collection, sharing, and reporting across jurisdictions and provide recommendations to FEMA on best practices and challenges. This initial study will inform FEMA's long-term approach and resource requirements for developing a broader set of standardized disaster impact metrics with the emergency management community.

ISSUE 12: REDUNDANT AND INEFFICIENT DOCUMENT COLLECTION FOR HOUSING ASSISTANCE

FEMA, HUD, other federal agencies, and private entities often provide post-disaster housing assistance but there is no centralized, efficient data collection mechanism that can be used across the enterprise. Departments and Agencies need to efficiently share data collected from each household (demographic, damage assessments, structural data) to minimize the burden on the survivor.

Recommendation 19-14: FEMA should develop a pilot program case management information system to streamline data/document collection across federal agencies, private, and private non-profit entities that provide housing assistance. This pilot program could use newer technology – such as blockchain – to centrally manage case files that can be accessed by multiple entities providing disaster housing assistance. Blockchain can allow a shared ledger to be used to eliminate redundant work across federal programs with requisite security features for access rights.

FEMA Response and Action: FEMA is actively working to streamline data collection as the Agency evaluates and redefines grant requirements under the Grants Management Modernization initiative, which is focused on the centralization and modernization of nine FEMA grant

programs. A primary goal of this effort is to improve the way FEMA and its partners use and share data across program areas.

ISSUE 13: MULTIPLE DHS AGENCIES, INCLUDING FEMA, COLLECT SIMILAR INFORMATION FROM THE PRIVATE SECTOR

The Department of Homeland Security as a whole, including FEMA, has multiple agencies offering similar services to private sector partners with little or no collaboration or cooperation on the information collected or coordination between agencies on the collection process.

Recommendation 19-15: FEMA should identify those employees with “right to know” or “need to know” for PCII information and require they take the requisite training.

FEMA Response: As the new Essential Support Function (ESF)-14 for Cross-Sector Business and Infrastructure becomes operational in the summer of 2019, the Office of Response and Recovery, Private Sector Division’s National Business Emergency Operations Center (NBEOC) is supporting the Cybersecurity and Infrastructure Security Agency (CISA) as the ESF coordinator for harmonizing information sharing across sectors.

FEMA Action: Both agencies are evaluating their plans, products, and processes that require the Protected Critical Infrastructure Information Program (PCII) and other appropriate training for handling sensitive information from the private sector and improving overall coordination of information collection and standardized data sharing between government and the private sector.

ISSUE 14: NEEDS OF DISABILITY COMMUNITY

The needs of the disability community are negatively impacted while FEMA implements a new approach to service delivery and accommodations.

Recommendation 19-16: While the new disability integration approach is implemented, FEMA should designate knowledgeable FEMA staff to work with and problem solve with the disability community responding partners in current and future response events.

FEMA should integrate just-in-time training competencies regarding accommodating people with disabilities and others with access and functional needs into pre-deployment training requirements as well as easy-to-use “how to” checklists.

FEMA Response: FEMA prioritizes stakeholder engagement as a fundamental aspect of building a culture of preparedness, readying the nation for catastrophic events, and reducing the complexity of FEMA.

FEMA Action: With respect to delivery of FEMA’s disability integration mission, the Office of Disability Integration and Coordination (ODIC) has conducted an extensive communication and just-in-time training campaign to increase understanding and implementation of key activities. Specifically, the campaign has focused on the significant advances the agency has made in fully integrating disability competencies into all FEMA programs and providing emergency managers at all levels with the tools and techniques they need to successfully support disaster survivors with disabilities.

- ODIC Director Linda Mastandrea presented to the national disability community as a guest speaker at Portlight Strategies' "Getting it Right" conference in May 2018; traveled to each of the states impacted by the 2017 and 2018 hurricane seasons to brief emergency managers and SLTT disability partners throughout the summer and fall; and briefed members of Congress and their staffs on this enhanced approach to mission delivery.
- Former FEMA Administrator Brock Long hosted two discovery sessions – one for SLTT emergency managers and a second for non-profit and private sector organizations, to both present and receive feedback on FEMA's approach to the disability integration mission. Administrator Long further directed that disability integration training be made mandatory for all FEMA personnel – initially in the form of an online course with plans to build out classroom curriculum once Congress fully funds the agency's budget.
- ODIC is assigning disability integration advisors to FEMA senior leaders across the agency to assist in inclusion of and engagement with disability partners in their day-to-day planning, updates to standard operating procedures for delivery of FEMA programs, and policy development efforts; there are currently Disability Integration Advisors (DIAs) assigned directly to the executive offices for the Associate Administrator for Response and Recovery, the Individual Assistance Division Director, and the Office of External Affairs with plans to staff other senior leaders in the months ahead.
- FEMA deployable disability integration advisors actively engage with SLTT disability partners through state-sponsored community engagement calls during disaster response and recovery; these calls are usually conducted daily immediately preceding and following the disaster itself with a transition to weekly calls as the mission shifts to recovery.
- ODIC is working with and deploying trainers to provide just-in-time training at all levels of disaster response and recovery to include meeting with headquarters program officials, briefing the deployable Federal Coordinating Officer (FCO) cadre, in-person and remote training of Disaster Survivor Assistance personnel deployed in 2018, and Joint Field Office (JFO)-level training upon request by field leadership at individual responses.
- FEMA is committed to providing all FEMA personnel with disability integration training (pending full FEMA appropriations) and intends to export that training to SLTT emergency managers based on lessons learned from internal delivery.

ISSUE 15: CRITICAL RECOVERY CONCERNS WITH NEW PUBLIC ASSISTANCE DELIVERY MODEL

The new PA delivery model may be slowing overall recovery efforts.

Recommendation 19-17: FEMA should conduct a 1-year post-2017 Hurricane Season diagnostic to evaluate the New PA Delivery Model and seek ways to make the Model more effective.

- FEMA should solicit feedback on Model improvements from SLTTs using the New Model.
- This should include assessing the staffing, turnover, and training of the Consolidated Resource Center (CRC) staff, and Program Delivery Managers (PDMGs), to identify areas needing extra support.
- FEMA should consider options to restructure the CRCs to make document review and PW processing more efficient. This could include consistent assignment of teams within the CRC to specific regions or states, allowing specialization in local construction and disaster types.

- FEMA should provide access to the Emergency Management Mission Integrated Environment (EMMIE) external system as a standard practice for all Sub-Applicants. EMMIE external system access will allow Sub-Applicants to identify errors and to better understand the status, damages, scopes of work, eligibility determinations, costs, and attachments while FEMA works to improve the New PA Delivery Model and the PA Grants Portal user experience.

FEMA Response and Action: The Public Assistance Division is focused on continuous improvement of program delivery and is regularly assessing workload and staff needs across the Consolidated Resource Centers. Staffing resources are currently aligned to specific processing lanes based on subject matter expertise to allow for specialization and consistency. The Public Assistance Division will engage with the Response and Recovery Subcommittee to learn more about their recommendations for process and service improvements.

ISSUE 16: OBSTACLES EXIST TO MERGING HAZARD MITIGATION FUNDING FOR THE SAME PROJECT

There is no formal guidance from FEMA encouraging the integration of Section 404 and 406 funds for the same hazard mitigation SOW. This is despite the fact that FEMA policy allows the coordination of both programs.

Recommendation 19-18: FEMA should clarify policy and provide better guidance on how Section 404 and 406 funds can be combined in order to advertise and encourage the proposal of a single hazard mitigation SOW to be jointly paid for with Section 404 and 406 funds. FEMA should empower Regions and JFOs to do joint Sections 404 and 406 benefit-cost analyses (BCAs) to evaluate cost-effectiveness and encourage states to include these projects in their priority projects list.

FEMA Response: FEMA recognizes that combining Section 404 Hazard Mitigation Grant Program (HMGP) and Section 406 Public Assistance (PA) hazard mitigation funds helps facilities and communities to achieve a greater level of protection and disaster resilience. FEMA allows and encourages applicants to coordinate Section 404 and 406 funds to achieve their risk reduction objectives and is taking steps to better support such projects.

HMGP's objective is to reduce or eliminate long-term risk to people and property from natural hazards such as retrofitting or elevating homes. HMGP can be used to reduce risk to communities and their facilities, whether damaged or undamaged, but not to repair disaster damage. HMGP is particularly well suited to combine with 406 mitigation because 404 mitigation is often most needed and effective immediately after a disaster when a community is acutely aware of its need to reduce future risk from the harm it has suffered. We agree that combining the facility-focused mitigation of 406 mitigation with the broader risk reduction of Section 404 at a critical recovery time post disaster makes for a more robust and vital mitigation effort.

There are significant differences in program authorities and eligibility requirements between the PA Program and HMGP. PA Section 406 mitigation funds must apply to a facility that has been damaged by a major disaster. Undamaged facilities and broader community-level projects are not eligible for 406 mitigation funding, regardless of vulnerability, even if essential to normal functioning of a community in the event of a disaster. With HMGP, however, the program is

administered by the state which sets funding priorities. There is no requirement that the funds be applied to damaged facilities.

To be eligible for mitigation funding under the PA Program, the mitigation measure must directly reduce the potential of future, similar damage to the facility. An applicant may use both 404 and 406 mitigation funds to implement mitigation measures on the same facility, but not for the same work. However, combining funds can be difficult because Section 404 mitigation funding is administered by the state, has different requirements, and operates on a different timeline than the PA Program.

The challenges to combining Section 404s and 406 can result in communities not achieving their risk reduction objectives. To help fill coordination gaps like the one highlighted in this recommendation, FEMA has recently established the Community Infrastructure Resilience Branch within the Federal Insurance and Mitigation Administration which is dedicated to working across FEMA's programs, especially PA and HMGP. This branch will help communities identify mitigation opportunities and develop processes and tools to assist communities in fully leveraging FEMA's mitigation funding.

FEMA Action: In the spirit of this recommendation, the Community Infrastructure Resilience Branch will work with Public Assistance and HMGP in developing clear and consistent policy and guidance to describe how communities can identify mitigation opportunities and execute cost effective and technically feasible projects under both programs. In addition, the branch is coordinating with the PA Program to streamline the process and reduce the administrative burden on communities in identifying 406 mitigation opportunities and applying for funding. The branch is also working to improve FEMA's technology platforms to facilitate the coordination across HMGP and PA to identify projects where FEMA can leverage funding from both programs. This includes allowing communities to use a single Benefit-Cost Analysis (BCA) for projects with combined funding. In addition, the branch will inform states, communities, and FEMA staff how to successfully complete the mitigation funding processes, including guidance on combined Section 404 and 406 funding. The branch will also evaluate past projects to ensure that communities are informed about the mitigation techniques best suited to reducing their risk.

ISSUE 17: PROCUREMENT RULES CONSTRAIN EFFECTIVE AND PROMPT RESPONSE

There is no clear FEMA guidance on allowable ways to secure pre-disaster emergency work contracts, except for debris removal. As a result, localities often hastily procure emergency contracts immediately after a disaster.

Recommendation 19-19: FEMA should better define and standardize emergency procurement periods post-disaster to include greater flexibility for SLTTs.

These guidelines should incorporate disaster type, magnitude, and complexity in order to provide SLTTs a reasonable timeline for the use of emergency procurements. The guidance should also clarify when and why SLTTs must re-procure contracts for their emergency procurements. The guidance should take into consideration that stopping work to re-procure a contract might not be in the financial and general welfare of the community, SLTTs and federal government.

FEMA should develop specific guidance promoting and clarifying how to procure eligible pre-disaster contracts for all types of eligible emergency work -- not just debris. FEMA should also incentivize pre-disaster contracts (e.g. pre-disaster grant funding for procurement preparedness).

FEMA Response and Action: Because emergency and exigency periods are circumstance-specific and are governed by Office of Management and Budget rules, FEMA does not have the ability to unilaterally define or standardize an emergency or exigency procurement period applicable to all disasters across the board. FEMA also notes that state and territorial government applicants are able to follow their own procurement rules when it comes to emergency or exigency contracting. For local and tribal governments and eligible private non-profit organizations (non-state applicants), FEMA is making a concerted effort to provide greater guidance and resources when procuring under an emergency or exigency period. For example, in January 2018, FEMA issued a Fact Sheet titled “[Public Assistance: Procurement Conducted Under Exigent or Emergency Circumstances](#)” which explains the exception and its applicability, provides examples, and includes a list of the elements non-state applicants should consider and document when using the exception. The [Public Assistance Policy and Program Guide](#), last updated in April 2018, provides guidance on non-competitive procurement under the emergency or exigency exception. In addition, FEMA’s Procurement Disaster Assistance Team (PDAT) provides training and guidance to non-state applicants on all procurement under grant issues, including procurement under the emergency or exigency exception. Beyond the extensive training and guidance PDAT provides, it has developed various resources to help Public Assistance applicants when procuring under a grant. Finally, FEMA is developing a resource toolkit to provide assistance to state and non-state applicants on establishing pre-disaster contracts, so they are better prepared to conduct emergency work. FEMA is committed to ensuring our partners are equipped with information so they are in position to properly procure contracts to address emergency and exigency needs when responding to any unforeseen events.