Individual Assistance Symposium

After-Action Report

September 2022

FEMA

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Executive Summary

On July 21, 2022, the Federal Emergency Management Agency's (FEMA) Individual Assistance (IA) Division, Office of Regional Field Coordination (ORFC), coordinated and hosted an IA Symposium for state, local, tribal, and territorial (SLTT) partners, other federal agencies, non-governmental organizations (NGO), and FEMA personnel. The IA Division includes a range of programs and functions that FEMA implements during each stage of the recovery life cycle and impact regional, SLTT, and NGO partners. The IA symposium sought to engage FEMA and its IA stakeholders in topics identified to be important to the IA community.

This symposium's goal was to provide attendees the platform to collaborate and learn so that there is a shared understanding of FEMA's capability to respond to and recover from disasters. FEMA Recovery leadership, IA leadership, and state IA partners provided presentations. Due to COVID-19, the symposium was held virtually using the Zoom platform.

Symposium Presenters

The Office of Response and Recovery (ORR), IA Division, invited multiple participants to discuss the topics identified by the IA community. Those participants are listed below:

- Jennifer Bible, Program Analyst, Individual Assistance Division, Office of Response and Recovery, FEMA

- Rebekah Kennedy, Individual Assistance/Community Services Section Specialist, Individual Assistance Division, Office of Response and Recovery, FEMA

- Brian Thompson, Coordination Unit Chief, Individual Assistance Division, Office of Response and Recovery, FEMA

- Cindy Atkins, Transitional Sheltering Assistance (TSA) Unit, Lead, Individual Assistance Division, Office of Response and Recovery, FEMA

1. Disaster Case Management Program

1.1. DCM: Presentation and Purpose

This presentation discussed a modern approach to applying for a Disaster Case Management (DCM) federal award. Previous approaches had longer approval timelines, but the modern approach exponentially reduces the burden and timelines to get to an approval determination for the applicant applying for DCM assistance. With the modern approach, case management services can be provided more quickly after the award is approved, and applicants are able to receive assistance sooner.

1.2. DCM: Overview

DCM is part of a funding supplement that FEMA provides to states through a federal award application process. When it is awarded, the funding supplements the state and local capacity to provide case management services to individuals. Case management consists of case managers connecting individuals that would not be able to recover on their own effectively and efficiently to the specific resources they need to address their disaster-caused unmet needs.

1.2.1. DCM APPLICATION PROCESS

Following an individual assistance (IA) declaration, applicants can apply for DCM funding upon assessing the basic population to serve, the disaster-caused unmet needs, and program needs. Applicants can submit their application around two to four weeks following the IA declaration. If FEMA approves the application, the applicants can commence the hiring and procurement process. The applicants can then begin to start the DCM services and submit modifications for funding as needed.

1.3. DCM: Requirements for Application Consideration

For DCM applications to be considered, the following requirements must be met:

- There must be a gap in what FEMA and Small Business Association (SBA) provides to individuals and resources to address those gaps;
- Resources need to be available within the state or communities because DCM uses existing resources;
- The ability to provide the services must be beyond the state and local capacity to provide; and
- The state must complete the application with the appropriate signatures.

The *Individual Assistance Program and Policy Guide* (IAPPG) provides more information on the DCM application process and applications.

1.4.   DCM: Timeline—Broken Down

Following disaster declarations, FEMA provides federal assistance to meet the needs of those affected by the disaster. DCM is a specific federal program that begins from day one following a disaster. In the first 30 days, DCM applicants assess the required information, complete the DCM application, and submit it for approval. Following application submission, DCM staff are hired, procured, and trained. Concurrently, other federal programs begin providing funding and support during this part of the response phase (i.e., Disaster Unemployment Assistance [DUA] and Disaster and Legal Services [DLS]). From 61-90 days after a disaster declaration, the implementation of DCM services is optimal. This is also the same point in the response that resources from Long-Term Recovery Groups (LTRGs) and philanthropic and private industries become available. The last component of DCM assistance delivery is evaluating and requesting DCM modifications if needed. This typically occurs from 91 days following a disaster declaration until DCM assistance is concluded.

1.5.   DCM: Modern Approach

The DCM modern approach is aimed at creating a buildable, scalable, and flexible approach to providing DCM assistance to those impacted by disasters. The initial approach to providing DCM assistance required planning for a 24-month period and everything that could happen during that period and then making alterations or adjustments towards the end of the 24-month period. The modern approach emphasizes evolving needs and how when needs evolve, so too should the methods used to address them. By prioritizing needs and gaps and understanding how they evolve over time, FEMA aims to serve disaster-affected communities better.

1.6.   DCM: Modern Approach's Three Basic Elements

FEMA identified three basic elements that can be used as guidelines for creating a buildable, scalable approach to providing DCM assistance in disaster-affected areas. The three basic elements are as follows:

- The population to serve;
- Implementation of DCM and resources; and
- Service providers.

1.6.1.   POPULATION TO SERVE

A main aspect of the DCM modern approach is to be more proactive prior to and throughout the application process. For example, regarding the populations that require additional assistance, FEMA recommends proactively identifying and using the population(s) that will likely need longer or more in-depth services rather than waiting for the FEMA registration to end to identify those populations.

1.6.2.   IMPLEMENTATION AND RESOURCES

Regarding the implementation of the DCM funding, FEMA recommends the following:

- Keep costs simple and succinct to include items needed for an initial or baseline program; and

- Maintain records and reports pertaining to staff training and DCM implementation to support submitted requests for modifications or additional staff.

By following these recommendations, FEMA aims to encourage building a more scalable baseline program that can be modified to meet the needs of those receiving assistance.

1.6.3. SERVICE PROVIDER

As the third basic element, FEMA recommends having a sub-award or a contract with a service provider that is experienced in DCM, maintains relationships within the community, and has connections to organizations with resources.

1.7. Question and Answer Section

Question Posed: "Under the DCM program area—the IAPPG outlines an IDCM grant, but that doesn't seem to have been available since last summer?"

FEMA Response: We haven't had an immediate DCM grant recently, but a FEMA-administered DCM program exists. We have been working on ensuring privacy protections, especially for that program. We hope to have that soon and to have some flexibility with the program to address individual disasters better. The program is on hold, but we will keep everyone posted as it becomes available again.

Question Posed: "The application is done by the state, not the municipality?"

FEMA Response: The STT is the one that does apply for DCM, but they can work with the municipality and gain their support in filling out that application.

Question Posed: "What platform or software do you use to manage the application/grant process?"

FEMA Response: We are currently working on getting a platform to help us manage it. Right now, we do a lot internally as a team with the region and the field.

I'm glad that someone brought this up. We are looking at a system that will help streamline the process and be a centralized location for people to apply and review. We are antiquated in the process and applications, but there is a light at the end of the tunnel so hang in there with us.

Question Posed: "The requirement of local resources and prior experience in identifying/securing DCM providers hasn't seem to have been enforced in this past year in NY, LA, and other areas where DCMPs were approved. How does each FEMA region ensure State OES follow guidelines?"

FEMA Response: This is a really good question regarding why making sure that states, tribal, and territorial governments (STTs) look to those relationships with the partners experienced with DCM services and have those connections to the local community is so important. So, what we are making sure to include in the policy is more language on that. We are also developing language for training, so you will see in the new updates to the IAPPDG that you will like what you see in there, but in the meantime, we are having conversations like this with STTs and Regions.

Question Posed: "What is the difference between this program and the one that is suspended?"

FEMA Response: This program is the federal award program. It is applied and awarded to states, tribal, and territorial governments (STTs). The one suspended is FEMA-provided, not the one the STTs oversee and manage.

Question Posed: "Who would be the right POC to reach out to regarding a platform/software solution? What is the timeline for this project?"

FEMA Response: What I am taking from this question in regards to an entity interested in applying for the Disaster Case Management (DCM) grant is how are you sure your software will be used? Please reach out to your regional counterparts. We have been working on system solutions, including privacy data, and that is a piece of that. You can always reach out to headquarters so we can assist if you don't know who your regional counterparts are.

Question Posed: "Is there any consideration of a Policy change prohibiting a for-profit corporation, particularly one outside of the state awarded, being awarded a DCP contract?"

FEMA Response: There are going to be opportunities to provide feedback regarding restricting them. That is a conversation we need to have.

Question Posed: "What should we expect from FEMA with regard to building capacity to establish LTRG in areas where they don't exist, and when would that support be available?"

FEMA Response: We need to put that on the parking lot so that we can hear from our voluntary partners on that one.

Question Posed: "The IDCM was also a direct grant to NC in their last hurricane rather than being FEMA administered - will that be available again to states in advance of the full DCMP grant applications?"

FEMA Response: In North Carolina, during Florence, the modern approach was something we looked at as a shorter-term timeline. It was the same idea with the foundational program, but we also restricted the timeline, and that caused some problems with procurement. After experiencing some programs with states, tribes, and territorial governments, we thought the timeline was too restrictive, so we are not looking at restricting the timeline.

2. Individuals and Households Applicant Letter Update

2.1. Background

Throughout 2017, 2019, and 2021, FEMA completed comprehensive reviews of the Individuals and Households Program (IHP) letters to identify improvements to serve FEMA applicants better. These reviews centered on program and policy changes, lessons learned, plain language, equity factors, and FEMA applicant focus groups. During the 2021 review, FEMA conducted focus groups to gather direct feedback regarding the letters. FEMA will use that feedback to revise and implement the improved IHP letters in August 2022. The next review of the IHP letters is tentatively scheduled to begin in 2024.

2.2. 2021 Correspondence Revision Highlights

During the 2021 review, 55 letters and 319 letter inserts were reviewed. The findings from the review indicated specific areas that would benefit from revisions. FEMA implemented the following revisions:

- Improved language to explain the requirement for certain survivors to complete the SBA loan process;

- Creation of a new Appeal Document Request Letter to provide information about what types of documents survivors should provide;

- Standardized closing paragraph in all letters for consistency;

- Removal of Special Flood Hazard Area information from the eligible letter template to minimize confusion;

- Improved the flood insurance information provided to survivors; and

- Revised letter language to help soften the tone of the ineligible/not approved letters.

2.3. 2022 Survivor Focus Group Revision Highlights

In 2022, FEMA held focus groups that centered on gathering feedback to improve the IHP applicant letters applicants receive when applying for federal assistance. Sessions were conducted from February 28 through March 10, and participants provided feedback regarding Cover Letters, customer service, the SBA Loan Application Process, ineligible letters, and other topics. Participants were also given the opportunity to provide specific suggestions that FEMA can implement to improve the IHP applicant letters. Noted highlights and suggested improvements include:

- Revising the Cover Letter to better explain the assistance that FEMA may provide regardless of the applicant's SBA loan status;

- Making clarifications to the SBA Loan Application Process section of the Cover Letter to make it easier to understand;

- Updating the determination letter Appeal section to explain what an applicant can do if they do not have all the necessary documents within the 60-day appeal deadline;

- Updating ineligible letter inserts to provide examples of uninsured losses to make them easier to understand;

- Replacing specific laws with the phrase "By law" to simplify the letters;

- Adding examples of acceptable ownership verification documents in the Cover Letter;

- Clarifying information added to the Cover Letter regarding homes located in a special flood hazard area and Group Flood Insurance Policy;

- Revising assistance type definitions in the Cover Letter to make them easier to understand;

- Including the Authorization for the Release of Information as an attachment to all determination letters so survivors can easily authorize a third party to act on their behalf, including meeting with the FEMA assessor; and

- Updating certain phrases or words for plain language (example: financial assistance versus money).

2.4.   Question and Answer Section

Question Posed: "Have there been any revisions or considered revisions to the process survivors must take to request extensions on rental assistance? We have found this to be an exceptionally burdensome process for the survivor as they look to obtain more permanent housing among numerous other steps they are undertaking for their recovery."

FEMA Response: Our continued rental assistance letters have been revised. That is one area we focused on (the forms themselves), which is part of OMB-approved forms. We can change the letter text, but we have to go through the OMB process. You will see some revisions on applying and submitting documents, but the overall letter itself has to go through that OMB process.

Question Posed: Is it clear on the new letter who is required to maintain flood insurance after receiving federal money for flood recovery? I have gotten conflicting answers from FEMA vs. SBA about the flood zone. FEMA said only properties in an SFHA have to maintain flood insurance. The SBA said that the FIRM zone doesn't matter because if you receive federal money for a flood, the property must maintain flood insurance.

FEMA Response: We have improved some of the language to give more detail to the applicants, but we also have been working with our partners in mitigation and strengthening the letters and explanations on flood insurance that goes out to applicants once they are on a certificate. A lot of that is driven by the mitigation folks, so as long as our program can give information about it, are things we would rather let the mitigation folks handle in their publications.

Question Posed: Has any discussion about the requirement that an applicant must sign an appeal letter? We have found that this requirement causes unnecessary delays in processing and providing assistance.

FEMA Response: Per our regulations at 44 C.F.R. 206.115(b), the applicant or person who the applicant authorizes to act on their behalf is required to sign the appeal prior to submitting it to FEMA for consideration.

Question Posed: A 'strike' team was put together during the Detroit Flood to go out and assist the elderly and disabled applicants. Many times we were approached by residents who had difficulties reading FEMA letters and/or writing appeals. Has any more thought been given to assist these applicants?

FEMA Response: Yes, our letters can only do so much. You can get things like larger print, but there are some things that you can only do (i.e., transition to audio) through different requests. Regarding sitting down with applicants, that is outside of our letters, but there is assistance that is available to sit down with applicants and go through things.

Question Posed: "If communication with survivors continues to be by letter, highlighting the need for translation to additional languages, how can the translation process be sped or benefit from additional resources?"

FEMA Response: That is a great question. We are currently building requirements for our new system, and the languages are something e have brought to the top that needs to be a consideration. We identified 12 languages we want to be a part of the process. That is why we have added that little block to call the helpline and use the language services. Until we build that, we don't have the means to write in languages other than English and Spanish.

Question Posed: "Can we see a draft of the new letter?"

FEMA Response: We are not publishing the drafts publicly. Once complete and approved, they will go into a repository on FEMA.gov. We don't want to put them out there just yet because they are consistently changing, and we are going through that final review.

3.   Individual Assistance Program Updates

3.1.   Question and Answer Section

Question Posed: "Can you give an overview of the latest FEMA non-congregate policy?"

FEMA Response: The current policy, done via memo published on June 28, 2022, shifts us away from the interim non-congregate policy COVID and shifts us back towards the position in the PAPPG. We are on version 4 of the document, and it has 2.5 pages on this. We are continuing some of the flexibilities, which is why you need to look at the memo and the PAPPG. Some of the flexibilities: continuing jurisdictions can implement Non-Congregate Sheltering without seeking approval. We want to make sure folks understand we are operating under the policy.

Question Posed: "What, if any, programs are under development for housing/sheltering beyond (short-term) TSA?"

FEMA Response: TSA is a form of non-congregate shelter that FEMA manages under the IA program. Sometimes, we think TSA is the easy button, but there are other challenges associated with this. A few things we have in the works are the IAPPG and allowing states to request where they would like hotels to be located. In the IAPPG, there will be a more robust component of what TSA is. It currently has a process for what the state request package needs to contain and how eligibility is determined. That is different than public assistance. What does the progression of TSA, if TSA is to continue, look like? It relies on individual and households housing components as it serves as a short-term emergency shelter as people transition to other housing options. Receiving rental assistance, completing their home repairs to return home, having an inspection, and finding out their home is safe to occupy are all part of the process. One of the other components from 2021 is the state can specifically request where they would like hotels to be located.

Question Posed: "Post Harvey - there was a change in FEMA IA policy that implemented a 2-week delay before TSA would be approved if requested by the State - is this still policy?"

FEMA Response: It is situation-specific. The intent is to allow congregate sheltering to stabilize because not everyone goes from that to TSA to temporary housing. It is helpful to let the congregate sheltering peak so we can meet the needs of those survivors. We have done it immediately and four to eight days post-declaration depending on the situation and needs at the time. There generally is a pause to allow the population to stabilize.

Question Posed: "Does the TSA come with case management?"

FEMA Response: It does not. It has either ended or is ending by the time disaster case management comes online. We were able to connect people with support services, but it can be overwhelming working with our community services and human services components. We try to identify resources to help individuals navigate that process. We have to work with state and federal resources to support those components that don't come with TSA.

Next Steps

The recordings from the 2022 IA Symposiums will be posted to https://www.fema.gov/assistance/individual/program/webinars.

The IA Division is committed to providing symposiums that address topics identified as important by the regions and SLTT partners. Please collaborate with your regional partners to identify any topics you would be interested in learning about or presenting to the IA community.

Thank you for your interest in FEMA's IA Symposiums. Please continue to engage with FEMA and participate in upcoming events. For questions or more information regarding upcoming events, please contact fema-hq-regional-field-coordination@fema.dhs.gov.