



**FEMA**

# **FEMA Response to National Advisory Council Report 2022 Recommendations**


*April 2023*



FEMA

May 24, 2023

MEMORANDUM FOR: Jeffrey Hansen  
Chairman, National Advisory Council

FROM: Deanne Criswell  
Administrator 

SUBJECT: **Response to the Recommendations of the 2022 FEMA National Advisory Council Annual Report**

The Federal Emergency Management Agency (FEMA) values our longstanding partnership with the National Advisory Council (NAC) and is pleased to respond to the recommendations contained in the November 2022 FEMA NAC Annual Report. This memorandum formally addresses the opportunities and recommendations raised in the report. Through our partnership, and with the NAC's thoughtful guidance, we will continue shaping the future of FEMA to support communities and ensure a more prepared and resilient nation.

With your ongoing assistance, we made significant progress over the course of 2022 in implementing the goals of the 2022–2026 FEMA Strategic Plan. Highlighted below are a few of those accomplishments in response to some of the recommendations the NAC made in 2022.

We appreciate the NAC's recommendation on Benefit-Cost Analysis (BCA), *2022-01: Revise the discount rate used in FEMA BCA calculations*. FEMA has been partnering with the Office of Management and Budget (OMB) over the past 12 months to improve the BCA process through discount rates, technical assistance, and equity rates. For example, FEMA allowed the use of a lower discount rate for some FY22 BRIC and FMA subapplications and continues to evaluate opportunities to optimize the discount rate. Our efforts are meant to ensure mitigation grants can be utilized by small and underserved communities. We will continue working with OMB to improve access to FEMA programs through BCA enhancements across all mitigation programs and hazard mitigation grants.

Regarding recommendation *2022-20: Streamline Public Assistance (PA) program requirements*, last year we commissioned an assessment of our PA delivery model to simplify the program and—most importantly—speed up documentation and process timelines. In line with the 2022–2026 FEMA Strategic Plan, Objective 3.3: Unify Coordination and Delivery of Federal Assistance, we are

committed to reducing the administrative burden for applicants. We re-established the Public Assistance Steering Committee to help improve the PA process and increased the large PA project threshold to \$1 million, while making the application process easier for projects under the threshold amount. Updating the threshold allows more projects to qualify for simplified procedures, giving communities more control in the rebuilding process and reducing the administrative burden on State, local, Tribal, and territorial (SLTT) partners and private nonprofits (PNPs) receiving PA assistance. We will continue making improvements to simplify our processes and expand access to FEMA programs and services for all communities.

In alignment with the FEMA Strategic Plan, Objective 3.1: Strengthen the Emergency Management Workforce, our agency is focused on building a workforce that reflects the diversity of our nation's communities. Language accessibility remains a top priority for the agency, and we are proud to say that we have implemented recommendation 2022-19: *Strengthen the ability to deliver services in languages other than English*. The Office of External Affairs (OEA) provides language services in different formats including written translations, over the phone/remote interpretation, on-site interpretation, and sign language interpretation services. Language services are established for all major disaster declarations that include Individual Assistance (IA) and any other survivor-centric program. Services are provided by language and interpretation contracts that allow us to quickly respond to the communications needs of survivors and are based on demographic data of impacted areas. FEMA staff who are fluent in other languages also support these efforts in the field.

During the COVID-19 response, translations were provided in 29 languages and over-the-phone interpretation services were supported in 55 languages. Digital web products and information were also made available in 13 languages. Response efforts for Hurricane Ida included up to 25 languages during peak of response. In response to Hurricane Ian in Florida, information and survivor-centric resources were available in nine languages, while over-the-phone interpretation services remained active for ongoing language access needs. On-site interpreters were also made available at recovery centers and outreach events across the State. OEA is also increasing the number of diverse language speakers in the External Affairs Incident Management Cadre and will leverage the strengths of local partners to increase this capacity in 2023.

Our people are our greatest asset. Not only are we dedicated to improving the experience of survivors and all community members, but we are equally committed to supporting our emergency management workforce. In response to the considerations outlined in recommendation 2022-17: *Develop policies, procedures, training, and research that reduces the potential for critical incident stress and PTSD for emergency management personnel*, we have implemented a tiered mental health program that includes self-help, peer support, and professional clinician services. Since January 2022, the FEMA Mental Health Program has provided over 150 psychoeducational webinars with over 10,000 participants agency-wide, trained over 100 peer support volunteers and deployed them to two disasters, and as of May 2023 have provided 660 mental health consultations, including 14 critical incident responses in-person, such as employee deaths in the field. These resources continue

to provide FEMA with the coping skills and confidential support necessary to maintain a resilient workforce. We will also continue to add partnerships and expand support services for staff responding to incidents across the nation.

We want to thank you for your thorough report and for your dedication and continued partnership as we work to improve FEMA and lift the entire emergency management community. We look forward to making progress on the valuable recommendations you have put forth and to another productive year of working together.

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**Note:** The [FEMA National Advisory Council Annual Report \(November 2022\)](#) provided recommendations centered around the goals and objectives of the [2022–2026 FEMA Strategic Plan](#), as listed under each section title below.

## Chapter 1: Current Events and Policy

### Section 1.1: Benefit-Cost Analysis (BCA)

*Strategic Plan Objective(s):* 1.2, 1.3, 2.2, 2.3, 3.3

#### 2022-01 – Revise the discount rate used in FEMA BCA calculations

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA partnered with the Office of Management and Budget (OMB) over the past 12 months on improvements to the BCA process, including discussions about discount rates, technical assistance, and equity weights. As a result of those discussions, FEMA recently released a memorandum on the [Alternative Cost-Effectiveness Methodology for Fiscal Year 2022 \(FY22\) Building Resilient Infrastructure and Communities \(BRIC\) and Flood Mitigation Assistance \(FMA\) Application Cycle](#), which permits the use of a 3% discount rate in some project BCAs. Additionally, in FEMA’s 2023 Annual Planning Guidance, the Administrator charged the agency to continue to improve access to FEMA programs through BCA enhancements across all mitigation programs. FEMA looks forward to continued coordination with our OMB counterparts to bring additional improvements to the BCA process for hazard mitigation grants.

<b>2022-02 – Prioritize equity impacts associated with the BCA</b>	
FEMA Response Decision:	Agree
FEMA Implementation Status:	Partially Implemented
<p><i>Please see response to 2022-01 above.</i></p> <p>For the first time in the <a href="#">FY22 BRIC cycle</a>, FEMA will review hazard mitigation project subapplications during the pre-award process that are competitive and otherwise eligible for selection where an Economically Disadvantaged Rural Community<sup>1</sup>, federally recognized tribal government, or other underserved community unable to calculate a Benefit-Cost Ratio (BCR) to demonstrate cost-effectiveness. FEMA may assist such communities with developing a BCA. In no case will FEMA award a hazard mitigation project that is not cost effective.</p> <p>With the disproportionate impact disasters have on underserved populations and communities, for Fiscal Year 2023 (FY23) FEMA is pursuing policy adjustments to expand the pool of eligible subapplicants for this assistance. FEMA is also partnering with OMB to investigate ways to include equity weights in the BCA calculations. Adjustments to the distributional weights will increase access and awards for these communities.</p> <p>FEMA has made a significant effort over the past seven years to expand the use of social and environmental benefits in the BCA and will continue this work. In 2022, FEMA updated its <a href="#">standard ecosystem services values</a>, which may be used in a BCA for any mitigation project that results in the preservation or enhancement of the natural environment. Using these values requires minimal data input in FEMA’s BCA software, and for many projects, these benefits alone may be enough to demonstrate the project is cost effective.</p>	

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<sup>1</sup> Definition from [Building Resilient Infrastructure and Communities Technical Criteria \(fema.gov\)](#): An Economically Disadvantaged Rural Community is a community of 3,000 or fewer individuals, as identified and validated by the applicant in the project subapplication, that is economically disadvantaged, meaning that residents have an average per capita annual income that does not exceed 80 percent of the national per capita income, based on best available data.



**2022-03 – Extend the alternative cost-effectiveness method to the Stafford Act – Section 406, Public Assistance Hazard Mitigation Program and the Stafford Act – Section 404, Hazard Mitigation Grant Program (HMGP)**

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

*Please see response to 2022-01 above.*

Expanding the use of Public Assistance (PA) mitigation has been an important component of the programmatic strategic priorities of building resilience. The PA Program is actively developing policy and processes to enhance the ability of PA applicants to access PA mitigation funding and will analyze the use of alternative cost-effectiveness methods for the program. This includes streamlining the cost-effectiveness evaluation through the adoption of FEMA’s [Precalculated Benefits](#) (released via memorandum in September 2022), updates to PA Mitigation Policy in the [PA Program and Policy Guide](#), and potential incentivization measures for applicants who take steps to mitigate risk to their facilities.

## Chapter 2: Equity Workgroup Recommendations

### Section 2.1: A Programmatic Approach Toward Equity

*Strategic Plan Objective(s):* 1.2, 1.3

#### 2022-04 – Advance the measurement of equity with a comprehensive review of equity lens, data metrics, and weighting

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA has made progress in understanding how programs leverage data to achieve equitable outcomes and in conducting discrete analyses of equitable program delivery. FEMA built dynamic dashboards using equity datasets and indicators and leveraged geospatial reporting in the field, to ensure support to underserved communities. Overlaying socioeconomic factors indicating high vulnerability with FEMA operational data enables better informed decisions throughout the disaster life cycle, especially during response and long-term recovery.

FEMA developed a robust community analysis tool (CAT) that captures demographic data from a broad set of data sources and applies the results during a disaster. The CAT is used to ensure that the most underserved communities are identified, and equity and equal-access issues are addressed in the decision-making touch points during the disaster life cycle. In addition, the Office of Equal Rights (OER) ensures digital information is accessible by communities in need of language services on FEMA’s website and in the field by leveraging available technologies and analyzing community language needs. OER also developed internal tools to perform civil rights trend analysis, identify gaps and best practices across disasters, and support leadership decisions to ensure equal access to FEMA’s programs and activities.

FEMA also conducted assessments across six program offices as part of a broader agency-wide approach to ensure greater equity. These offices analyzed their current data to identify opportunities to remedy data gaps and advance equity and are implementing policy changes to improve program delivery for survivors such as the Language Access Policy and the Sign Language Interpreter programs.

The ability to collect demographic data of populations served by FEMA is imperative to achieving the intent and spirit of civil rights laws. Accordingly, FEMA obtained approval from OMB to collect certain demographic data from disaster survivors on a voluntary basis to help identify equity gaps. The enhanced data collection allows FEMA to accurately identify and increase targeted resources to the underserved communities that policies and funding are intended to benefit.

Further, FEMA tracks equity-related data on contract awards, including small business awards and local business awards. Progress is reported monthly to the Department of Homeland Security on meeting small business goals and analyzed to identify opportunities to address shortfalls. FEMA continues its commitment to engage small and minority business communities, ensuring individuals are educated relative to the formality of doing business with the federal government and maximizing FEMA procurement and contracting opportunities.

FEMA has also pursued and improved processes for developing data-sharing agreements with our external partners to support the incorporation of equity data into program delivery. FEMA and Argonne National Labs developed and maintained the [Resilience Analysis and Planning Tool \(RAPT\)](#), a free, no-login-required Geospatial Information System (GIS) web map to quickly investigate population resilience indicators, infrastructure locations, and hazards. RAPT also includes the FEMA Community Resilience Index, a composite measure of potential challenges to resilience at the county and census-tract level. RAPT allows users to examine equity in all phases of emergency management to ensure that benefits from mitigation projects benefit at-risk areas. By uploading disaster assistance application data in RAPT during disasters, FEMA can compare applications to the population base to ensure those eligible for assistance have applied. This may include areas with high poverty rates, high rate of languages spoken other than English, or high rate of populations who do not have access to a vehicle.

With respect to grants, the Grant Programs Directorate (GPD) is taking steps to increase equity in the grant application process so that all eligible applicants have the resources to apply for competitive preparedness grant opportunities. GPD is actively evaluating the geographic distribution of applications across the nation to identify where barriers to information and application access exist. GPD is also incorporating scoring considerations into programs, where appropriate, to prioritize underserved community recipients and conducting outreach to socialize these updates and help more organizations apply. For example:

- 2,334 participants learned about the application process and requirements of the Nonprofit Security Grant Program (NSGP) during three webinars held in November and December of 2022.
- The Tribal Homeland Security Grant Program (THSGP) enhances equitable distribution of funds to our Tribal Nation partners by adding to the scores of applicants who have not received funding in prior years.
- GPD held four tribal consultations with Tribal Nations, with more than 500 total participants to review and identify barriers to our grant programs.

- GPD is conducting a comprehensive review to assess all FEMA grant programs for inequities and barriers to underserved communities in receiving, applying for, or accessing federal funds.

The Office of Disability Integration and Coordination (ODIC) integrates the needs of people with mobility, sensory, or cognitive disabilities, as well as older adults, through a proactive approach to policy, programmatic, and purpose-driven equity. To meet our goal to shorten the disaster cycle for these disproportionately affected communities, ODIC issued a Director's Intent, which identifies 14 potential points of inequity where we typically see problems occur and provides steps to anticipate and mitigate them. This will enable emergency managers across sectors to proactively remove barriers to programs and services.

The ODIC Director's Intent will be supported by internal and external tools, training, and tactics to:

- Operationalize risk profiling for people with disabilities and access and functional needs.
- Measure common potential points of inequity in the disaster cycle across the 10 FEMA regions.
- Strengthen community response networks and outreach strategies.
- Provide data and enable Disability Integration (DI) teams to scale our equity-oriented tactical reach.
- Provide our teams with year-to-year measurements that capture equity data through the application of universal access and design.

We will use this information as guiding principles and benchmarks against which FEMA will measure success.

Although each of these activities advances the goal of ensuring equity in our program delivery, FEMA recognizes that significant opportunities exist to more comprehensively advance equity across the emergency management community. FEMA has committed to continuing evaluation of existing equity data, decision-making tools, resources, and guidance for emergency managers to support shared equitable outcomes in the delivery of disaster assistance programs. The Office of Policy and Program Analysis (OPPA) will review available tools and guidance to develop an internal agency one-stop shop of equity-related resources to inform decision making. These resources will enable more equitable and consistent delivery of FEMA programs across the nation and provide transparency to FEMA partners and customers on the decision-making process within our programs.

**2022-05 – Consider a distributional equity lens to refocus support on small communities, tribes, territories, and local jurisdictions by providing technical assistance relevant to each entity**

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

In line with the [White House’s Justice40 Initiative](#), FEMA’s 2022 Annual Planning Guidance committed Resilience to directing at least 40% of the benefits of preparedness and mitigation programs to underserved communities. In May 2022, Resilience adopted an interim equity data standard that identifies underserved communities. The standard was used across 2022 Notices of Funding Opportunities (NOFOs) for competitive mitigation and preparedness grants that prioritize these communities. Recognizing that there are limitations to the interim equity data standard, grant programs were also encouraged to utilize additional data or justifications to identify underserved communities as needed. An updated standard reflecting the release of the Council on Environmental Quality’s (CEQ) [Climate and Economic Justice Screening Tool \(CEJST\)](#) and lessons learned from 2022 are being used for the 2023 NOFO cycle. Additionally, in accordance with [Executive Order \(EO\) 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#), FEMA conducted a comprehensive review of all grant programs to assess potential barriers to underserved communities in receiving, applying for, and accessing our grant funds. The results and recommendations from this review are being used to redress any inequities in our programs to these communities, and FEMA will continue to monitor and review ease of access to our grant programs on an ongoing basis.

In recognition that many communities may not have the expertise or resources to complete grant applications, FEMA is investing in improving our technical assistance programs. As an example of work that has already been done in this area, the BRIC Direct Technical Assistance (DTA) initiative supports communities that may not have the resources to begin resilience planning and project solution design on their own. Eligible applicants include local governments and Tribal Nations, and prioritization is based on meeting one or more definitions of “disadvantaged” based on [EO 14008, Tackling the Climate Crisis at Home and Abroad](#); meeting Resilience’s interim equity data standard; qualifying as an economically disadvantaged rural community; or showing a compelling need based on number of disaster declarations, availability of local resources, and strong community engagement that would benefit from technical expertise. FEMA has established relationships with 28 DTA communities and is beginning to provide support to them via our providers. BRIC DTA is looking to select at least 40 new communities in 2023 and will use a set of criteria for selecting communities that include distributional equity. FEMA continues to build the institutional capacity to provide more of this support in the future.

FEMA is also conducting an Enterprise-Wide Technical Assistance Review to be completed in 2023 that will inventory technical assistance, identify gaps and overlaps, and document ways each technical assistance offering can remove barriers to access, especially for underserved communities. OER will also support the programs by providing technical assistance to assess the potential effect of FEMA policies and whether these policies could result in disparate outcomes. OER will ensure that civil rights obligations are being met by FEMA and recipients of FEMA financial assistance.

As described in the response to 2022-04, FEMA GPD seeks to increase equity in the grant application process so that all eligible applicants have the resources to apply for competitive preparedness grant opportunities. Fulsome stakeholder engagement is a cornerstone of all programs. FEMA continues to expand the volume, types, and schedules of outreach and feedback sessions it provides. Events are offered year-round, and for various days and times, to increase the likelihood that stakeholders can attend at least one session; at least 80 outreach events are scheduled throughout the Calendar Year 2023, focusing on preparedness grant programs including the Homeland Security Grant Program, Tribal Homeland Security Grant Program, Emergency Management Performance Grants Program, Port Security Grant Program, Transit Security Grant Program, Intercity Bus Security Grant Program, and Regional Catastrophic Preparedness Grant Program. FEMA hosts multiple information sessions for applicants in advance of application periods opening. This allows for stakeholders to begin planning their investments well before the eventual release of the NOFOs each year. Once the NOFOs are released, FEMA hosts multiple outreach sessions with stakeholders to help walk them through critical program and application process information. With respect to NSGP, FEMA emphasizes outreach to nonprofits, including partnering with the Department of Homeland Security (DHS) Center for Faith-Based and Neighborhood Partnerships, to provide webinars and information sessions. In 2022, GPD held 74 NSGP-related events with a total of 14,945 attendees to support broad program participation.

Additionally, as directed in FEMA's 2023 Annual Planning Guidance, the agency will reduce barriers to increasing community resilience by creating a service delivery model for providing place-based assistance to underserved communities. Place-based partnerships are collaborative, long-term approaches to build thriving communities, delivered in a defined geographic location. FEMA will also implement recent legislation in the Community Disaster Resilience Zones Act of 2022 to expand planning and technical assistance to high-risk, disadvantaged areas.

FEMA continues to pursue changes that will streamline processes and reduce barriers to

programs, particularly for underserved communities. These changes include maximizing federal cost share for these communities, awarding points to first-time grant applicants, and adjusting the BCA process. As an example, the 2022 Consolidated Appropriations Act increased the federal cost share to not less than 90% for all emergencies or major disasters declared between January 1, 2020, and December 31, 2021. Increasing the federal cost share reduces the financial burden on underserved communities and makes mitigation funding more accessible.

FEMA developed a series of HMGP project-type-specific guidance and support materials to help subapplicants submit complete and eligible applications. These [application support materials](#) cover 13 of the most requested HMGP project types, and materials for five additional project types are currently under development. Additionally, in Spring and Summer of 2022, to support capability- and capacity-building efforts and increase program awareness, HMGP launched its first national webinar series. Each webinar focused on building sub-applicant capability and capacity to successfully apply for and receive HMGP funding.

## Chapter 3: Climate Subcommittee Recommendations

### Section 3.1: Enhance Climate Literacy

*Strategic Plan Objective(s):* 2.1

#### 2022-06 – Strengthen and develop programs that enhance climate literacy of the nation’s current and future emergency management workforce

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA has advanced goals in climate literacy through the Homeland Security National Training Program (HSNTP) within the National Preparedness Directorate’s (NPD) National Training and Education Division (NTED). One HSNTP training partner—the National Disaster Preparedness Training Center at the University of Hawaii—developed and delivers climate-related training courses including *Climate Adaptation Planning for Emergency Management*. A total of 1,595 students from 11 states, Puerto Rico, Guam, and American Samoa, have completed this course since 2016. Also, through NTED’s HSNTP Continuing Training Grants program, FEMA invested \$3 million through competitive cooperative agreement awards with Columbia University’s Climate School and the Georgia Institute of Technology (Georgia Tech) to develop and deliver a suite of training courses that will build climate literacy for the nation’s current and future emergency management workforce. Delivery of courses is anticipated to begin by April 2024.

In addition, FEMA’s Emergency Management Institute (EMI) will undergo a transformation to include developing certificate programs to address knowledge gaps in the emergency management profession. FEMA has identified knowledge gaps in critical areas such as Climate Adaptation, Equity for Emergency Managers, Data Analytics, Disaster Logistics and Supply Chain Management, Disaster Finance and Grants Management, Disaster Law and Policy, and Disaster Project Management. These certificate programs will support the 2022–2026 FEMA Strategic Plan and the Administration priorities related to climate resilience and equity by enhancing emergency managers’ understanding of climate science, the impacts of climate change, and effective climate adaptation strategies. In FY23, EMI is analyzing future certificate programs for professionals, proposing options for structuring new EMI certificate programs, and creating and defining a process for establishing certificate programs. EMI will begin work in FY23 on the development of the Climate Adaptation, Equity, and Cyber Security Certificate Programs.

Further, as part of its transformation, EMI will establish an Office for Disaster Research



(ODR), or equivalent functionary, that partners closely with appropriate entities and organizations to effectively transfer climate- and disaster-related research into operationalized information for emergency managers. ODR will scan, aggregate, and analyze disaster research and lessons learned to make curricula updates and provide information and seminars in a more informed and rapid fashion so that relevant research and lessons observed can be translated into lessons learned, thereby improving national resilience. ODR will work with partners to better facilitate the translation of climate change- and climate justice-related research into improved educational and qualification opportunities for emergency managers, including academic and professional degrees, courses, workshops, certifications, and educational campaigns aimed at increasing climate literacy of the public. EMI will focus on building quality, mutually-supporting partnerships with existing research centers and universities, including minority serving institutions (MSI) and historically black colleges and universities (HBCU); national labs; the DHS Science and Technology Centers for Excellence; the National Oceanic and Atmospheric Administration (NOAA); the National Institute of Standards and Technology (NIST); the U.S. Geological Survey (USGS); and others. Where feasible, EMI will continue expanding partnerships with K–12 school systems, faith-based networks, non-governmental organizations (NGOs), and civic organizations to build the next generation of emergency managers and enhance climate literacy.

FEMA is also working to strengthen its ability to develop training to advance climate literacy within National Fire Academy (NFA) classes. FEMA has seen the impacts that climate change is having on our emergency responders at the state, local, tribal, and territorial (SLTT) levels through weather incidents including wildfires, hurricanes, heat, drought, flooding, and more. Equally important, we have seen alternative fuels, because of their potential to decrease the amount of greenhouse gases, have an impact on our nation’s first responders. This includes incidents involving alternate fuel vehicles (e.g., propane, battery, hydrogen), solar photovoltaic (PV), and lithium-ion batteries. FEMA will continue to work through the U.S. Fire Administration (USFA)/NFA to bring awareness to the nation’s career and volunteer fire agencies through various partnerships and to incorporate climate literacy materials into NFA classes.

FEMA is also developing planning considerations for climate that will outline potential roles for, and contributions by, emergency managers with regard to climate adaptation and planning. This document will explain climate science in the context of disaster preparedness and how communities can develop effective climate adaptation strategies and highlight existing climate resources and tools. The climate guide is currently in the initial drafting stage, and we anticipate a first draft for national engagement in Summer 2023.

## Section 3.2: Promote the Understanding of Climate Risks

*Strategic Plan Objective(s):* 2.2

**2022-07 – Develop and ensure Hazard Mitigation Plans (HMPs) at the SLTT levels account for climate-driven impacts and ensure FEMA facilitates this requirement with the development of informational data products, robust training, and technical support**

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

On April 19, 2022, FEMA released the updated state and local mitigation planning policies—previously known as the Plan Review Guides—[State Mitigation Planning Policy Guide](#) (FP 302-094-2) and [Local Mitigation Planning Policy Guide](#) (FP-206-21-0002). The updated policies will be in effect for all mitigation plans approved on or after April 19, 2023. The policy updates include, among other priorities, the requirement for state and local communities to incorporate climate change data in their risk assessments. The mitigation plan requirements continue to be flexible and allow jurisdictions to decide how to meet the requirements based on jurisdictional capability and capacity. State and local mitigation plans are required to be updated every five years, so the incorporation of climate change in mitigation plans will be realized on a rolling basis over the next five years.

Additionally, FEMA updated various related mitigation planning products and training to align with changes to the updated state and local mitigation planning policies. For example, the state and local training courses offered through FEMA’s Regional Offices were revised in December 2022 to include guidance on how the effects of climate change can be addressed in mitigation plans. In addition, updated products such as the Local Mitigation Planning Handbook (March 2013) will be posted to [Create a Hazard Mitigation Plan](#) by June 2023.

FEMA agrees with the recommendations to further develop informational products, training, and technical support and to coordinate with other federal agencies. FEMA continues to promote the use of best available data from a variety of sources as well as support development of a compendium of climate change data and resources. For example, the [National Risk Index \(NRI\)](#) is an online mapping application that visualizes natural hazard risk metrics. The NRI includes data about expected annual losses from natural hazards, social vulnerability, and community resilience. The NRI is pursuing the inclusion of future forecasted risk from climate change. Also, the [Climate Risk and Resilience Portal \(ClimRR\)](#) includes dynamical downscaled climate projections that will provide granular and actionable climate impact information for SLTTs. RAPT will continue to include the best available demographic, infrastructure, and hazard data—including future forecasted climate impact data

from ClimRR and other sources—to support the development of hazard mitigation plans in underserved communities.

### Section 3.3: Identify Communities Susceptible to Greatest Impacts

*Strategic Plan Objective(s):* 2.3

#### 2022-08 – Ensure that risk models consider the disproportionate impacts of climate change on diverse, underserved, and historically marginalized communities

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA NPD’s National Preparedness Assessment Division (NPAD) assists SLTT stakeholders with their Threat and Hazard Identification and Risk Assessment (THIRA) process by regularly communicating methodology updates and availability of new and existing guidance documents and training materials. Consistent with the 2022–2026 FEMA Strategic Plan, NPAD created a National Preparedness, Equity, and Climate Change Considerations Roadmap that outlined NPAD’s approach to introducing more climate change and equity considerations to SLTTs for their THIRA/Stakeholder Preparedness Review (SPR) assessments. In 2022, NPAD delivered an implementation support session that walked SLTTs through the process of creating custom capability targets with a focus on climate resilience, impacts, and measures, as well as identifying inequities in underserved communities and ways to report them through the assessment. NPAD conducts a series of implementation support sessions throughout the calendar year to provide detailed information about the THIRA methodology, reporting requirements, and ways that SLTTs can use their THIRA data to inform preparedness efforts. These sessions include the RAPT team to demonstrate and promote the use of RAPT with examples focused on THIRA/SPR assessment completion. The THIRA is submitted using the Unified Reporting Tool (URT) data reporting system, in which NPAD also provides guidance documents, fact sheets, training materials, technical assistance session recordings, and community stakeholder-developed resources.

FEMA will continue to develop specialized materials and implementation support sessions that engage stakeholders directly on equity and climate change as part of the all-hazard THIRA/SPR. Additionally, FEMA will continue to promote examples of how climate resilience efforts or impacts related to climate change may be considered and incorporated as a part of a community’s THIRA/SPR assessment process.

Through the Future of Flood Risk Data (FFRD) initiative, [Risk MAP](#), and the National Hazards Risk Assessment Program (NHRAP), FEMA is working with other federal agencies

to deliver probabilistic flood risk assessments at a national scale. This will enable FEMA partners with a quantitative dataset and tools to examine hazard, risk, and social equity.

As FEMA learns more about how information compels people and communities to take resilient actions, Risk MAP will produce new products using this knowledge. As the National Flood Insurance Program (NFIP) explores ways to evolve from the current binary approach to flood hazard to a risk-informed approach, Risk MAP will produce different flood hazard and risk products and tools that support the new approaches and drive flood-resilient actions. While working toward this goal through FFRD, which will provide authoritative climate-informed flood data along with a more comprehensive view of current flood hazards, FEMA will utilize its existing flood data to support execution of the Federal Flood Risk Management Standard (FFRMS).

The NRI, described in previous responses, is an online mapping application that visualizes natural hazard risk metrics. The NRI includes data about expected annual losses from natural hazards, social vulnerability, and community resilience. By including social vulnerability and community resilience, the NRI can identify communities that are disproportionately at risk to natural hazards. [Hazus](#) is a GIS-based natural hazard analysis tool developed by FEMA. Hazus provides a public and free hazard risk model for all communities to access, enables the ability of communities to measure risk posed by climate change, and ensures future investments will continue to remove barriers of entry for users. Hazus results are available to users through the [Hazus Loss Library](#). For additional information, please see response to 2022-05 for ways FEMA is supporting communities’ equitable access to resources to mitigate the impacts of future disasters.

**2022-09 – Facilitate the transition of state-of-the-art research into the development of climate science-based operational tools**

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA is committed to facilitating the transition of state-of-the-art research and supporting the development of climate science-based operational tools, in line with the 2022–2026 FEMA Strategic Plan, [Goal 2: Lead Whole of Community in Climate Resilience](#).

FEMA has made significant progress in the development of science-based operational tools. This includes continuing to promote the use of best available data from a variety of sources, as well as supporting development of a compendium of climate change data and resources. Examples of this include the NRI, Hazus, and ClimRR, which were discussed in multiple

previous responses. Additionally, Hazus provides a free and public platform for users to understand hazard risk imposed by climate change.

In another example, FEMA developed ClimRR in collaboration with AT&T and Argonne National Laboratory. ClimRR provides free, forward-looking, high-resolution, dynamically downscaled climate change data for communities across the U.S. ClimRR allows non-technical and technical users to visualize climate impacts at mid-century (2045–2054) and end of century (2085–2094). ClimRR and its data will continue to improve throughout 2023 by providing future forecasts for more hazards (e.g., wildfire, coastal flooding), improved data resolution, updates to the user interface, and integration of the data across the enterprise.

FEMA also supported the development of the Climate Mapping for Resilience and Adaptation (CMRA) tool. This online tool integrates information from across the federal government to help people consider their local exposure to climate-related hazards. People working in community organizations or for SLTT or federal agencies can use the site to help them develop equitable climate resilience plans to protect people, property, and infrastructure.

RAPT, described in previous responses, will continue to include the best available demographic, infrastructure, and hazard data, including future forecasted climate impact data from ClimRR and other sources.

As demonstrated by FEMA’s commitment to the NRI, Hazus, CMRA, ClimRR, and RAPT, FEMA recognizes its critical role in the development, integration, and provision of climate science-based operational tools.

FEMA will engage the ingenuity and innovation capacity of our nation’s research universities to enhance our nation’s climate resilience. FEMA will consider the use of applied research contracts, challenge grants, and other formal or informal mechanisms to enhance the operational capabilities and capacities of emergency management in the United States. For example, to support the NRI, FEMA purchased the [Spatial Hazard Events and Losses Database for the U.S. \(SHELDUS\) database](#), which provides a robust historical loss data base from Arizona State University’s Center for Emergency Management and Homeland Security. FEMA has also partnered with U.S. universities to support communities evaluate their readiness to incorporate nature-based solutions (NBS) into hazard mitigation projects, identify barriers to incorporating NBS, and to provide best practices for promoting NBS at state and local levels. FEMA will encourage partnerships between organizations receiving federal research funds and those able to translate those research findings into operational tools and technologies, as these partnerships are instrumental in enhancing the nation’s emergency

management capabilities and capacities. For example, FEMA’s partnership with Argonne National Laboratory in development of RAPT and ClimRR is an example of engagement with a Federally Funded Research and Development Center (FFRDC) in the development of science-based operational tools. FEMA will continue to foster partnerships with research universities and national labs as we seek to further enhance our nation’s climate resilience.

## Section 3.4: Whole-of-Government Approach for Climate Programs and Policies

*Strategic Plan Objective(s):*      2.1, 2.2, 2.3, 3.3

### 2022-10 – Partner with other federal agencies in coordinating climate-related policies, priorities, funding programs, and federal assistance

FEMA Response Decision:      Agree  
 FEMA Implementation Status:      Partially Implemented

FEMA is actively engaged in addressing climate hazards such as extreme heat, drought, and climate mitigation and is reviewing how to improve our understanding of the federal authorities and capabilities to support those issues, identify gaps, and determine whether there are areas where FEMA could provide better support through development or update of agency policy.

FEMA leads the multi-agency coordination of mitigation efforts across the federal family and its partners through the Mitigation Framework Leadership Group (MitFLG), which operates under the National Mitigation Framework. MitFLG members include NIST, NOAA, USGS, the Small Business Administration (SBA), the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the U.S. Department of Housing and Urban Development (HUD), among others. FEMA MitFLG leaders also regularly coordinate with White House executive offices such as the National Security Council, CEQ, and the National Climate Task Force. The MitFLG includes SLTT partners for critical local input and to ensure that tools and resources developed within the federal family are effective and well distributed to local governments.

Along with its MitFLG partners, FEMA worked on the development of the CMRA tool. This online tool integrates information from across the federal government to help people consider their local exposure to climate-related hazards. People working in community organizations or for SLTT or federal agencies can use the site to help them develop equitable climate resilience plans to protect people, property, and infrastructure. The site points users to federal grant funds

for climate resilience projects, including those available through the Bipartisan Infrastructure Law, also known as the Infrastructure Investment and Jobs Act. It also links together other important tools for climate resilience including FEMA's Recovery and Resource Portal, U.S. Climate Resilience Toolkit, and Federal Flood Risk Management Resource Tool.

In 2023, the MitFLG plans to begin the development of a new, all-hazard resilience resourcing tool and integrate it with the existing CMRA tool. The envisioned portal would be easy to access and provide SLTT decision makers with resilience funding and resource information, including project ideas, inspiration, and possible partnership opportunities. With the MitFLG's support, this opportunity could be the key to encouraging further federal agency interactions toward offering a tool that advances national climate resilience goals.

FEMA's PA Program provides supplemental grants to SLTT governments, and certain types of private nonprofits, so communities can quickly respond to and recover from major disasters or emergencies. FEMA Recovery, through the PA Program, coordinates with the federal interagency on climate-related policies and priorities in many areas. This includes incorporation of input from federal partners on new initiatives to implement statutory and regulatory authorities in agency policies. Recent projects to implement statutory authorities include collaboration with DOE, EPA, and others to generate ideas to incentivize resilient building design after disasters and the use of energy- or carbon-efficient materials during the recovery process. Additionally, FEMA PA consults with federal partners on standardized codes and standards authorities that, when used, will help our financial assistance recipients and applicants to build back better after disasters.

## Chapter 4: Readiness Subcommittee Recommendations

**Note:** The NAC Readiness Subcommittee provided intention that recommendations related to wildfire be applied to all hazards.

### Section 4.1: Environmental and Historic Preservation (EHP)

*Strategic Plan Objectives:* 3.2

#### 2022-11 – Conduct a full review of the EHP process and explore metrics for all mitigation projects to be processed more expeditiously

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

At the request of the FEMA Administrator, the Office of Environmental Planning and Historic Preservation (OEHP) within Resilience is carrying out an assessment on the EHP process, to include an independent review and analysis. The independent third-party review is being conducted by RAND’s Homeland Security Operational Analysis Center (HSOAC). The assessment reviewed data from over 80,000 FEMA grant projects across the breadth of FEMA grants programs. Concurrently, OEHP is also conducting listening sessions that focus on FEMA’s grant applicants and end users of the EHP process to further understand the applicant burden and challenges of the EHP process from the applicant perspective. OEHP is also working to identify improvements and process changes that will enable FEMA’s EHP teams to provide our SLTT partners with improved technical assistance, customer service, and transparency by providing greater communication on the EHP process.

OEHP is conducting listening sessions with our external stakeholders to understand concerns and identify recommendations. One listening session was held with the National Emergency Management Association (NEMA) in April 2022 to understand general concerns about the EHP process for all of FEMA’s grant programs, including mitigation. A second listening session, co-hosted by CEQ, was held with western states in May 2022 and focused specifically on wildfire grants. In 2023, to date, OEHP has engaged with 25 FEMA grant applicants across eight FEMA Regions via listening sessions to understand EHP challenges from the SLTT perspective. OEHP is also planning on distributing a survey broadly to our external stakeholders to gather additional feedback on EHP process improvements and potential solutions in late Spring/early Summer 2023.

The stakeholder engagement, surveys, and independent review will result in actionable recommendations that reduce complexity and increase customer service, transparency, and



timeliness for EHP compliance reviews, while maintaining legal defensibility of FEMA grants for over 40 laws, regulations, and EOs. OEHP anticipates final recommendations from the independent review and courses of action for improving technical assistance, customer service, clarity, and transparency by April 2023. Specific to mitigation grants, OEHP is also working throughout 2023 to build additional streamlining review tools, as well as to broadly evaluate opportunities to incorporate additional environmental compliance review efficiencies across mitigation grant programs.

## Section 4.2: Limitations for Wildfire Mitigation

*Strategic Plan Objective(s):* 3.2

### 2022-12 – Reconsider wildfire mitigation interpretations

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

The Wildland Fire Mitigation and Management Commission, established by the Bipartisan Infrastructure Law and led by the U.S. Department of Agriculture (USDA), the U.S. Department of the Interior (DOI), and DHS (through FEMA), is tasked with studying and making recommendations to improve federal policies relating to the prevention, mitigation, suppression, and management of wildland fires in the United States and the rehabilitation of land in the United States devastated by wildland fires. The Commission released its first recommendations on aviation use in wildfire in February 2023. FEMA is participating in the Commission as a co-chair along with participation from other principals including USFA, Hazard Mitigation Assistance (MitFLG), Public Assistance Division (RSFLG), FEMA Region subject-matter experts (SMEs) as subgroup participants, and SMEs and staff liaisons chiefly through USFA. Once the Commission has completed its work and provided its complete list of recommendations, FEMA will conduct an evaluation of the recommendations against current policies and operational protocols. Such an assessment will specifically focus on recommendations made by the Resilience Planning Workgroup; the Post Fire Workgroup, the Communities workgroup; and the Data, Technology, and Science Workgroup within the Commission.

FEMA’s programs are also constantly evolving to address the growing need for mitigation across the nation. Both Regions 9 and 10 have hosted wildfire summits in the past year. SLTT applicants and subapplicants are encouraged to submit innovative and effective mitigation projects that address the increasing risk of multiple hazards in their communities. Outreach efforts include expanding guidance on eligible projects and providing more resources and support to help subapplicants develop applications. HMGP and HMGP Post Fire are working

to expand eligibility of mitigation projects that address fire-adapted communities including promoting home defensible space, drought, wildfire, extreme heat, and other natural hazards. The wildfire mitigation eligibility expansion is currently in an exploratory phase.

HMA programs continue to encourage applicants and subapplicants to submit innovative and effective mitigation projects that address the increasing risk of multiple hazards that communities face. To support applicants, programs are actively working to expand guidance on eligible projects and provide more resources and support to help subapplicants develop applications. As an example, HMGP has created a series of application support materials that provide step-by-step guidance on developing an application based on the project type. Currently, there are 13 application support materials hosted on FEMA.gov including acquisition and demolition, community safe rooms, flood risk reduction, and others. HMGP and HMGP Post Fire are also working to expand eligibility of mitigation projects that address drought, wildfire, and other natural hazards. New application support materials that address drought mitigation projects, such as aquifer storage and recovery and reservoir retrofits, are currently in development; however, expanding drought mitigation eligibility is part of a larger drought policy update. HMGP is working with the HMA Policy Branch to engage stakeholders, including HMA's External Stakeholder Work Group, to identify drought mitigation priorities and challenges to developing projects. This includes exploring the impact of water rights on funding projects. Stakeholder engagement is in the early stages with an update to the drought policy expected in 2024. The wildfire mitigation eligibility expansion is currently in an exploratory phase.

Any changes resulting in additional eligible wildfire mitigation project types may be applicable to HMGP, HMGP Post Fire, and BRIC, since all three grant programs allow for funding to support wildfire mitigation. FEMA also released the first iteration of the Safeguarding Tomorrow Revolving Loan Fund Program in late December 2022. Through this program, FEMA will provide capitalization grants to states, territories, and eligible federally recognized Tribal Nations to establish revolving loan funds for local governments to reduce risks from natural hazards and disasters, including wildfires.

FEMA also supports mitigation projects that have co-benefits and can address multiple hazards (e.g., drought, wildfire, flooding) and is exploring mitigation policy updates that may address feasibility and programmatic considerations for new mitigation activities. HMGP continues to encourage applicants and subapplicants to consider projects that address climate change and bolster natural hazard risk mitigation, such as nature-based solutions. On Aug. 16, 2022, the President signed the Inflation Reduction Act (IRA) into law. Section 70006 of the IRA authorizes FEMA to provide financial assistance under HMGP-relevant sections of the

Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) for: “(1) costs associated with low-carbon materials; and (2) incentives that encourage low-carbon and net-zero energy projects.” Section 70006 authorities expire on September 30, 2026.

Implementation options have been drafted by an IRA working group and are currently under review by HMA leadership. HMGP is also continuing to expand its application support materials to provide technical guidance and reduce the burden of application development for common project types.

The USFA, through the NFA, will continue its lines of effort within existing curriculum and new course development that will expand learning objectives and increase awareness and action within the SLTT responder community. This will include training and education on wildfire deployment and operations; mitigation needs and techniques to address the fire problem within the wildland urban interface; and wildfire mitigation within Community Risk Reduction and technical fire prevention courses.

### Section 4.3: Limitations for Wildfire Operations

*Strategic Plan Objective(s):* 3.3

#### 2022-13 – Take a stronger role in wildland fire interagency coordination

FEMA Response Decision: Partially Agree  
 FEMA Implementation Status: Partially Implemented

Multiple federal agencies play a role in wildfire prevention, control, and recovery, which is why interagency coordination is crucial. Currently, the USFA has an established position within the National Interagency Fire Center (NIFC), which provides a direct contact with wildland fire interagency coordination. USFA is postured to coordinate across fire entities working in wildfire prevention, mitigation, and response.

USFA relationships within the NIFC, and those within the extended wildfire space, can bolster the FEMA role in wildland fire interagency coordination moving forward. The NIFC could be a location to host an annual wildfire summit that includes SLTT governments and provide the continuous conduit to discuss, modify, and implement policy and coordinate with other federal land management agencies.

Additionally, as noted in the response to 2022-12, the Wildland Fire Mitigation and Management Commission—co-chaired by USDA, DOI, and DHS (through FEMA) and comprised of representatives from federal agencies, Tribal Nations, state and local municipalities, and private entities—will aid in wildland fire prevention, mitigation,

suppression, and management. The Wildland Fire Commission was established by the Bipartisan Infrastructure Law and focuses on recommendations to mitigate and manage wildland fire. There are 50 members from diverse geographies and backgrounds. The Commission's main objective is to forward federal policy recommendations centered on ways to prevent, manage, suppress, and recover from wildfires. The Commission includes two FEMA representatives of the interagency MitFLG and Recovery Support Function Leadership Group (RSFLG). These representatives are responsible for coordinating interagency input to and from the MitFLG and RSFLG for greater wildfire mitigation policy considerations. FEMA's participation is a unique opportunity to provide Congress with actions the agency wants them to take, provide directional guidance, and provide transformational recommendations.

As part of our ongoing work, FEMA, through the RSFLG and USFA, coordinated with federal departments and agencies to compile, consolidate, and summarize the various federal recovery grant programs available to state, local, and territorial governments, and Tribal Nations for wildfire disaster recovery. The compilation describes a variety of pre-disaster Federal grant and cost-share programs across USDA, DOI, and FEMA that can support community-led efforts to prepare for wildfire. The information can be accessed on the [USFA website](#) and on this [Federal Wildfire Resources document](#).

Finally, the Fire Management Assistance Grant (FMAG) Program is also available to states, local, and tribal governments, for the mitigation, management, and control of fires on publicly or privately owned forests or grasslands, which threaten such destruction as would constitute a major disaster. A unique aspect of the FMAG Program as compared to the PA Program is its regionally-administered declaration process and program management. FMAG declarations are issued by the FEMA Regional Administrators and do not require coordination up through the national level. Some FMAG declarations are initially issued verbally, with the appropriate documentation submitted within the following 24 hours. The regionally-administrated nature of the FMAG Program makes it quite responsive and is an example of the authority to commit federal resources being delegated to increase the program's efficacy. When approved through the Stafford Act process (Sec. 420), FEMA can also take a more direct role in coordination of response and recovery efforts for wildfires. For example, in January 2022, the Marshall Fire became the most destructive in Colorado's history. FEMA coordinated with the U.S. Army Corps of Engineers (USACE) to mobilize technical assistance monitors and support the unprecedented clean-up effort in Boulder County. FEMA also used advanced geospatial technology to do virtual assessments to improve response coordination and enable faster recovery.

<b>2022-14 – Update Fire Management Assistance Grant (FMAG) program guidance</b>	
FEMA Response Decision:	Partially Agree
FEMA Implementation Status:	N/A
<p>FEMA agrees with the NAC that “encouraging immediate action by all parties near the fire will significantly reduce the fire’s impact, size, and overall costs.” Indeed, FEMA believes the underlying intent of Section 420 is to provide expedient financial assurance to states to enable risk-informed decision making focused on the impacts and consequences of fire, instead of too heavily weighing the costs of the necessary activities. FEMA intends FMAGs to be relatively nimble and quickly responsive to states facing dynamic and threatening fire conditions to enable rapid repositioning of resources for intervention and containment or protection, evacuation, and extinguishment.</p> <p>FEMA is evaluating the <a href="#">FMAG Program and Policy Guide</a> to determine where it might be possible and appropriate to more closely align with Category B assistance provided under emergency and major disaster declarations. However, there are some restrictions in the FMAG regulations, like the requirement that costs be “associated with the incident period of the declared fire” and that repositioned resources must be used to be eligible.</p> <p>Moreover, the USFA will continue to support the FMAG process through providing subject-matter expertise and addressing questions from stakeholders and regions as appropriate.</p>	

## Chapter 5: Workforce Subcommittee Recommendations

### Section 5.1: Workforce Realignment

*Strategic Plan Objective(s):* 1.1

#### 2022-15 – Reassess and realign the FEMA workforce

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

In accordance with the NAC’s recommendation to stay flexible in the face of sustained increases in FEMA’s traditional and non-traditional mission requirements, while equitably supporting communities nationwide, the agency is taking proactive steps to ensure FEMA’s future readiness to meet ongoing and emerging needs. However, this recommendation’s title and proposed strategies do not encompass the full scope of how FEMA can better ready its workforce.

The incident workforce (IW) is one of the most important resources FEMA leverages to achieve our mission of helping people before, during, and after disasters. To ensure FEMA’s future readiness, the agency has developed a Workforce Readiness Cycle/Model (the Cycle) centered around growing and retaining an experienced, well-trained, and resilient workforce in the face of increasing operational demands to support the 2022–2026 FEMA Strategic Plan Objective 1.1: Cultivate a FEMA That Prioritizes and Harnesses a Diverse Workforce and Objective 3.2: Posture FEMA to Meet Current and Emergent Threats.

The Cycle will be a cultural change for the agency by taking a new approach to building, developing, deploying, and supporting our people. Key lines of effort supporting this initiative include examining FEMA’s delivery of a fair and equitable pay system; building recruitment mechanisms that clearly and accurately represent FEMA’s roles and expectations; leveraging existing flexibilities for reservists to increase the reliability of responder availability and align with responder needs; making information on career progressions, expectations, mentorship, and other resources easily accessible; designing a process to allow staff time to rest and recuperate after deployments; and continuing to evolve the FEMA Qualification System to meet stakeholder needs in a trusted, predictable, and consistent way.

Several lines of effort are already underway. The Civilian Reservists Emergency Workforce Act ([CREW Act](#)), signed into law on September 29, 2022, extends Uniformed Services Employment and Reemployment Rights Act (USERRA) protections to FEMA reservists deployed to Stafford Act disasters, giving FEMA a powerful tool in recruiting reservists from a broader and more experienced talent pool. The agency is also working to enhance its internal and external surge staffing capacity, establish standard deployment trainee and mentor ratios to

develop “bench” depth, and assess and staff FEMA’s Regional IW teams so regions have the resources necessary to expand their capacity to manage routine disasters. Moreover, FEMA is continuously reviewing and revising Position Task Books to ensure IW position requirements maintain relevancy.

FEMA is also developing a climate literacy standard to be implemented through agency programs, training, and exercises. Additionally, training courses are currently being developed to ensure FEMA employees understand their obligation to deliver services and resources in a manner that is equitable and compliant with civil rights requirements and to instruct all FEMA employees on FEMA’s core values and guiding principles. FEMA has also acquired additional land and a building adjacent to the existing FEMA Incident Workforce Academy to increase opportunities for trainings and exercises, increased support of regional course delivery, and began coordinating to identify potential resources for a streamlined Learning Management System (LMS)/Learning Content Management System (LCMS).

**2022-16 – Develop a nationwide campaign to promote the availability of free, online courses delivered by FEMA’s EMI**

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA’s EMI promotes its training course catalog and individual courses through social media, websites, newsletters, and conference booths. EMI will work closely with OEA to develop a nationwide campaign to promote the availability of free, online courses. Further, EMI will be leveraging a public affairs director in the future to lead this effort. The goal of this campaign will be to increase public awareness of disaster preparedness, response, recovery, and mitigation. It will be designed to reach specific segments of the population, such as business and industry; volunteer, neighborhood-based, and faith-based organizations; high school, vocational school, and college students; and members of the general public, including those living in diverse and underserved communities. EMI’s catalog of courses in Spanish will be promoted in communities with a large percentage of Spanish-speaking individuals. EMI currently has 25 of the most utilized courses translated into Spanish and available online. Utilization records will continue to be reviewed to determine if other courses should be translated as well. FEMA will focus on outcomes that will increase personal preparedness, increase the engagement of community organizations, promote participation in [Community Emergency Response Teams \(CERT\)](#) and [FEMA Corps](#), and develop interest in careers in emergency management. Developing this campaign may require gathering feedback from focus groups of target segments, partnering with community and industry leaders and organizations, and identifying spokespersons with leadership or celebrity status.

## Section 5.2: Workforce Resilience

*Strategic Plan Objective(s):* 3.1

### 2022-17 – Develop policies, procedures, training, and research that reduces the potential for critical incident stress and post-traumatic stress disorder (PTSD) for emergency management personnel

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA has implemented a tiered mental health program consisting of self-help (e.g., psychoeducational workshops, Headspace application on employees’ FEMA-issued mobile devices), peer support, and professional clinician services (e.g., stress counseling, consultation, crisis incident response) intended to reduce the potential for critical incident stress. This tiered mental health program is an internal FEMA capability and is in addition to the Employee Assistance Program (EAP), which provides a variety of offerings like counseling and therapy referrals, financial and legal services, and health and wellness presentations.

In 2023, FEMA’s team of mental health and medical support staff will study the relationship between specific variables and symptoms of trauma and stress within FEMA’s emergency management community.

FEMA continues to explore ways to strengthen these endeavors and additional partnership opportunities, both internal and external to the agency. This could include, but is not limited to, adding professional counselor positions at the regional level to increasing agency capacity. This will help develop an agency-wide mental health support network, providing force-multipliers for all agency mental health initiatives to protect the workforce from critical incident stress. FEMA will continue to explore ways to increase awareness of EAP services, strengthen internal mental health programs and capabilities, and build partnerships to reduce the potential for critical incident stress.

## Section 5.3: Staffing Long-Term Operations

*Strategic Plan Objective(s):* 3.1

### 2022-18 – Establish hazard-specific recovery teams

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented



FEMA is taking multiple steps to innovate how we engage with SLTTs through our program delivery and engagement with federal agencies through the Recovery Support Functions. In alignment with the 2022–2026 FEMA Strategic Plan, Goal 3: Promote and Sustain a Ready FEMA and Prepared Nation, FEMA continues to identify, develop, and utilize personnel to meet the needs of the nation. For example, FEMA is doing this through the establishment of Direct Housing Implementation Teams, increasing our organic workforce through Individual Assistance Regional Force Structure, and leveraging the Recovery Support Functions early in the lifecycle of a disaster.

To remain agile to existing and emerging threats, the Office of Response and Recovery developed program area functional teams rather than focusing on specific hazards. In 2022, FEMA piloted two Direct Housing Implementation Teams (DHITs). DHITs are comprised of pre-rostered FEMA staff who fill key management positions within the existing organizational structure addressing direct housing. DHITs support the standardization of direct housing implementation and provide consistent leadership during early phases of disaster response and recovery. DHIT members may coordinate with the applicable missioned assigned Recovery Support Functions, whose role will be discussed later in this section. With the two DHIT deployments in Kentucky and Florida last year, the average time to licensing the first survivor into housing has decreased to 19 days. For comparison, for Hurricane Laura in 2020, the first licensing took 48 days. These teams' early deployments in 2022 resulted in households being licensed in faster than before, with just 16 days from eligibility to housing solution in Kentucky (DR-4663-KY) and 22 days from eligibility to housing in Florida (DR-4673-FL). Based on the increased needs of the housing mission and successes found from the pilot, FEMA will establish national and regional DHITs to support this key element to recovery.

In addition to functional teams, FEMA is reviewing the Regional Force Structure to increase incident management personnel and better meet the need for routine disaster operations in each region. By increasing regional personnel, FEMA staff will be able to develop relationships with SLTTs prior to events and build upon those relationships with SLTT staff as they work through long-term recovery efforts. FEMA staff will be better enabled to further develop relationships with SLTTs during steady-state planning and through long-term recovery efforts.

Recovery for the whole community takes a whole-of-government effort. In recognition that Recovery efforts begin at the onset of disasters, FEMA and the interagency partners are expediting the timeline through the early activation of the Recovery Support Functions. Early activation of RSFs in 2022 have yielded positive results for communities across the nation. For example, in Kentucky, the Housing Recovery Support Function played a critical role in supporting the development of plans to advance the Governor's vision to reimagine communities. This was done through facilitated collaboration between a large group of state-level stakeholders, to include members of Kentucky Emergency Management (KYEM); the

Public Protection, Transportation, and Finance and Administration cabinets; the Kentucky Housing Corporation; and the Council for Community Resilience and Recovery (CCRR).

FEMA supports recovery through programmatic implementation designed to be flexible to meet the needs of the nation across multiple hazards. FEMA will continue to strengthen relationships with SLTTs, develop nationally and regionally based teams, and provide faster and consistent program implementation.

## Section 5.4: Language Barriers During Deployments

*Strategic Plan Objective(s):* 3.1

### 2022-19 – Strengthen the ability to deliver services in languages other than English

FEMA Response Decision: Agree  
 FEMA Implementation Status: Implemented

FEMA is committed to building an emergency management community that is accessible to survivors and SLTT partners. In alignment with the 2022–2026 FEMA Strategic Plan, Objective 3.1: Strengthen the Emergency Management Workforce, FEMA is focused on building a staff that is representative of the nation we serve, and language accessibility remains a top priority for the agency for all programs across the disaster management cycle.

The OER External Civil Rights Division administers and ensures compliance to FEMA’s Language Access Plan (LAP). The LAP sets forth the principles that FEMA uses to provide and improve meaningful access for persons with limited English proficiency (LEP) to the agency’s operations, services, activities, and programs.

In addition, OEA currently translates all response and recovery information into Spanish, including public education materials, websites, and social media, as well as other languages spoken in disaster-affected communities. This includes digital web content in six primary languages for FEMA.gov and up to 29 languages for disaster-specific webpages. The number of languages will vary by disaster based on actual demographics and identified language needs for a particular area. OEA maintains a cadre of Spanish language speakers and American Sign Language (ASL) interpreters and has contracts in place for language needs in multiple languages, so we can immediately respond to the language needs of communities across the nation. OEA is working to boost its cadre of language speakers and language education through additional recruitment and hiring, as well as leveraging community partners to increase its capacity in 2023.

FEMA seeks to build a diverse workforce of staff who not only speak different languages but

also bring an understanding of the variety of cultures from each corner of the nation during disasters. Regional efforts have also been made to ensure accessibility to non-English speaking survivors. For example, in FEMA Region 2's Puerto Rico Caribbean Area Office (PR-CAO), staff have translated several programs' materials into Spanish to support pre-disaster planning with communities throughout the year. During Hurricane Fiona response operations, FEMA and the Commonwealth used Puerto Rican Sign Language (PRSL) at Disaster Recovery Centers (DRCs) and when interacting with survivors to provide the best version of sign language accommodation, more equitably engaging FEMA programs and assistance.

In FEMA Region 6, products for Hurricane Ida—including media advisories, fact sheets, news releases, public service announcements (PSAs), flyers, and other public affairs materials—were produced in eight different languages including Chinese, English, French, Haitian Creole, Khmer, Korean, Spanish, and Vietnamese. Additionally, the region initiated an in-person translation contract to support Disaster Survivor Assistance (DSA) and DRCs in the heavily impacted areas. The contract included six languages that were interchangeable based on need, and translators also supported Speaker's Bureau events and housing operations as needed for survivors eligible for FEMA's Direct Housing program.

Although several NTED training courses have been available in Spanish in the past, those courses have since been archived due to lack of demand from the SLTT community. Should this change, NTED is prepared to offer newly developed and existing courses in languages other than English.

The Office of the Chief Information Officer (OCIO) is exploring technological solutions for language barriers. OCIO supports the use of translation service contract vehicles to deliver services in languages other than English that can be scaled to meet disaster survivor needs.

Internally, FEMA will continue to strengthen coordination with agency stakeholders to remove language barriers for survivors, SLTT partners, and FEMA staff, while ensuring equity. Externally, FEMA will seek opportunities to collaborate with our network of NGOs and faith-based organizations with foreign language capabilities to support FEMA's mission. By leveraging Memorandums of Understanding (MOUs) and Memorandums of Agreement (MOAs) with NGOs, we can preposition services to be available to communities from the onset of a disaster and throughout long-term recovery efforts.

## Section 5.5: PA Program’s Administrative Burden on Workforce

*Strategic Plan Objective(s):* 3.1

### 2022-20 – Streamline PA program requirements

FEMA Response Decision: Agree  
 FEMA Implementation Status: Partially Implemented

FEMA is committed to streamlining existing PA program requirements to reduce the administrative burden on both the FEMA workforce and applicants. To help achieve the 2022–2026 FEMA Strategic Plan, Objective 3.3: Unify Coordination and Delivery of Federal Assistance, the agency has taken into action measures to reduce community gaps and enhance delivery of the PA program.

In early 2022, FEMA reestablished the PA Steering Committee to help improve the PA process for applicants. FEMA has begun to implement proposed changes from the committee.

In March of 2022, FEMA made [initial changes](#) based on recommendations to help speed recovery efforts and reduce applicant burden by:

- 1) Simplifying documentation requirements for unobligated projects;
- 2) Waving the requirement that unobligated projects with completed small projects must be prepared based on actual costs;
- 3) Adjusting the deadline for projects with work already completed;
- 4) Deploying technical experts from FEMA Consolidated Resource Centers (CRCs) to aid project scoping and development for complex operations and projects;
- 5) Releasing the [Public Assistance Sampling Procedure](#) to reduce documentation level requirements; and
- 6) Clarifying that FEMA Regional Administrators have authority to approve time extensions for project closeout.

In September 2022, FEMA took additional steps to streamline PA by:

- 1) Allowing additional flexibility in costs claimed for power restoration work;
- 2) Eliminating size requirements for the eligibility of the removal of hazardous trees, limbs, branches, and stumps for debris removal projects;
- 3) Allowing applicants to develop cost estimates faster without using consensus-based codes in 50% rule calculations. In order to support timely replacement determinations in support of rapid recovery and streamlining the process for 50% rule calculations, FEMA is providing applicants the option to not use higher consensus-based codes, specifications and standards in 50% rule calculations; and

- 4) Not requiring separate cost analysis from work performed through the Emergency Management Assistance Compact (EMAC) during disaster response and recovery operations.

In January 2023, FEMA released the results of the Independent Assessment of FEMA's Public Assistance Program. The [report](#) will continue to aid in the agency's commitment to simplify and streamline program requirements, reduce the burden on stakeholders/applicants, and expand access to PA grant funding.

Additionally, FEMA's PA Program is continuing its efforts to simplify the program by increasing the PA Small Project Threshold to \$1 million, updating the [Public Assistance Program and Policy Guide](#) (PAPPG, currently in Version 4, effective June 1, 2020), and hosting Policy Summits. FEMA's PA program is looking for further opportunities to quickly implement changes to simplify the program and address community gaps more effectively. For additional information, please see the response to 2022-05 for ways FEMA is supporting communities' equitable access to resources to mitigate the impacts of future disasters.