



**FEMA**

# **FEMA Responses to the National Advisory Council 2023 Recommendations**

*April 2024*



**FEMA**

March 13, 2024

MEMORANDUM FOR: Carrie Speranza  
Chair, National Advisory Council

FROM: Deanne Criswell  
Administrator

SUBJECT: **Response to the Recommendations of the National Advisory Council 2023 Annual Report**

The Federal Emergency Management Agency (FEMA) is pleased to respond to the recommendations in the National Advisory Council (NAC) 2023 Annual Report. This memorandum formally addresses the opportunities and recommendations raised in the report. Through our partnership and the NAC’s continued leadership, we will continue shaping the future of FEMA to support communities and ensure a more prepared and resilient nation.

FEMA values the longstanding partnership with the NAC. The recommendations over the past several years have encouraged FEMA to lean into a culture of continuous improvement and have had significant impacts on FEMA programs. In the [NAC’s 2020 Report](#), the NAC challenged FEMA to use equity as the foundation of emergency management. On December 9, 2021, I released the 2022-2026 FEMA Strategic Plan with Goal 1 stating “Instill Equity as a Foundation of Emergency Management.” With your ongoing assistance, we have continued progress over the course of 2023 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 2023 NAC recommendations.

We appreciate the NAC’s 2023-01 recommendation on Responder Mental Health regarding the expansion of preparedness grant eligibility to include the development and sustainment of mental and behavioral health programs. Through this recommendation, FEMA has identified that through the Public Assistance (PA) program, FEMA may consider eligibility and allowance for an applicant establishing mental and behavioral health services in their Emergency Operations Center (EOC) to support the personnel directing and coordinating emergency response activities.

Regarding recommendation 2023-04: Share by Default, FEMA’s Enterprise Analytics Division has developed an Enterprise-Wide Privacy Threshold Analysis (PTA) to streamline the required

review process prior to sharing aggregate and desensitized data outside the agency. This will contribute to FEMA's ability to share desensitized data more quickly and proactively. The development of the FEMA Data Exchange (FEMADex) also contributes to a "share by default" culture by providing a scalable, cloud-based data platform that is easily integrable with the agency's data systems.

Recommendation 2023-06 shows alignment with FEMA's Strategic Plan Goal 3: Promote and Sustain a Ready FEMA and Prepared Nation. Identifying lessons learned from the COVID-19 pandemic is critical to enable the government to adapt to emergent threats and to help individuals and communities better leverage federal programs. FEMA recognizes that monitoring the lessons learned and smart practices identified from the various COVID-19 related recovery grant programs can improve fiscal responsibility and provide benefits to all communities. FEMA is continuing to develop lessons learned to include FEMA's public assistance program, individual assistance program and the various funding streams associated with COVID-19 financial assistance, based on after action reports, stakeholder feedback, and data collected from various sources. FEMA welcomes the opportunity to present to the NAC when a report is finalized.

A shining example of the impact the NAC has on national policy can be seen through improvements to the Agency's Benefit Cost Analysis (BCA) process. The NAC has commented extensively over the past several years on needed changes to the BCA process in order to allow SLTTs to implement critical mitigation projects. Both FEMA and the Office of Management and Budget (OMB) have updated their respective policies, including OMB's circular 94-A- which has been updated for the first time in decades.

Finally, I want to recognize the importance and value of our partnerships with Tribal Nations and territories. I want to thank the NAC for their emphasis on inclusion and consideration of the unique challenges that affect each jurisdiction. FEMA agrees that the unique circumstances of all U.S. territories and Tribal Nations must be considered and should be supported with inclusive practices.

Thank you for your dedication and continued partnership as we work to improve FEMA and the support we provide to the emergency management community. We look forward to making progress on the valuable recommendations you provided and to another productive year of working together.

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## FEMA Responses to the NAC 2023 Recommendations

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2023-01: Responder Mental Health	
<b>Recommendation</b>	FEMA should expand its preparedness grant eligibility list to include the development and sustainment of mental and behavioral health programs, in addition to broadening post-disaster assistance to include mental and behavioral health support for all emergency responders and those who support emergency response efforts.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>FEMA agrees that mental and behavioral health for emergency responders and those who support emergency response efforts are critical to maintain a stable and effective workforce to respond to emergencies. Recognizing that in many disasters first responders and emergency managers are also directly impacted, mental and behavioral health programs may be needed to support local response personnel as they navigate stresses from both community and potential personal losses. FEMA is tackling the issue of mental and behavioral health programs in several ways including grant funding, engagement with subject matter experts, and leveraging international partnerships.</p> <p><b>Preparedness Grants</b></p> <p>FEMA currently has grant programs that cover expenses for the development and sustainment of emergency responder mental and behavioral health programs. For example, the <a href="#">FY 2023 Assistance to Firefighters Grant (AFG) program</a> allows fire departments and certain EMS organizations to fund “eligible wellness and fitness activities,” including mental health services through the Employee Assistance Program.</p> <p>FEMA supports adding responder mental health as an eligible expense under many of its preparedness grants. Unfortunately, absent legislative change, it is not permissible without being explicitly tied to a “terrorism nexus”.</p> <p><b>Post Disaster Assistance</b></p> <p>Additionally, FEMA’s Public Assistance (PA) program is authorized to provide funding for emergency protective measures (EPMs) to save lives, protect public health and safety, protect improved property, or eliminate or lessen an immediate threat of additional damage. While not explicitly stated in the Public Assistance Program and Policy Guide (PAPPG), FEMA will consider eligibility and allowance for work and costs necessary to protect the health and safety of emergency responders conducting eligible EPMs and will review the PAPPG for opportunities to clarify eligible allowances. For example, FEMA will consider eligibility and allowance for an applicant establishing mental and behavioral health services in their Emergency Operations Center (EOC) to support the personnel directing and coordinating emergency response activities. This consideration would not only apply to EOCs as it would also extend to protecting the health and safety of the applicant’s personnel conducting eligible emergency protective measures.</p>	

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### Additional Efforts

Outside of funding opportunities, the U.S. Fire Administration (USFA) is actively engaging subject matter experts in first responder mental and behavioral health. During the 2023 U.S. Fire Administrator’s Summit on Fire Prevention and Control, USFA established a working group dedicated to providing comprehensive mental health and well-being resources for all fire and emergency medical services (EMS) personnel with the following priorities:

- Priority 1: Convene a subgroup for mental health resilience.
- Priority 2: Develop unified, evidence-informed messaging that raises awareness about mental health and well-being and disseminates approaches for resilience building.
- Priority 3: Explore approaches for removing barriers to resources (e.g., funding, licensing, access, availability) and increasing fire and EMS personnel access and availability to resources.

The USFA regularly collaborates with the working group to deliver on each priority.

Finally, while it does not specifically target the SLTT emergency responder population, first responders who are disaster or emergency survivors themselves can receive crisis counseling services through FEMA’s Individual Assistance [Crisis Counseling Assistance and Training Program \(CCP\)](#). CCP is a disaster and emergency assistance federal award program available to states, Tribal Nations, and territories. It provides supplemental, non-clinical mental health coping services to disaster survivors for up to nine months following a Presidentially declared incident, in coordination with the Substance Abuse and Mental Health Services Administration (SAMHSA) within HHS.

### Next Steps for 2024

As part of FEMA's update to PAPPG Version 5, the Public Assistance Program will review the NAC's recommendation related to responder health and safety, including mental health.

FEMA will also review its authorities to determine if additional mental health programs are allowable expenses under its other grant programs, identify other federal government funding opportunities for state, local, tribal, and territorial (SLTT) mental and behavioral health programs (e.g., U. S. Department of Health and Human Services (HHS)), and as appropriate, leverage expertise from FEMA’s employee mental health programs.

FEMA looks forward to partnering with the NAC on this important issue.

## 2023-02: Emergency Medical Services

### Recommendation

FEMA should explore opportunities to position emergency medical services (EMS) as its own public safety profession similar to fire services and law enforcement; ensure adequacy of resources, including personnel, medical supplies, equipment, and vehicles to effectively respond to emergencies; and engage

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	in ongoing investment in EMS infrastructure through grant funding opportunities.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>EMS is a complex system of care, often spanning public safety, public health, medicine, community preparedness, disaster response, and homeland security. In recognition of the critical role EMS clinicians play in response to both Stafford Act and non-Stafford Act events, the USFA believes that EMS should be elevated in the overall scope of disaster preparedness, resilience, and response to ensure SLTT organizations can meet the FEMA Administrator’s National Capability Targets outlined in the <a href="#">2022-2026 FEMA Strategic Plan</a>. The USFA is actively engaged in the effort to elevate EMS nationwide. USFA has renamed the Fire Programs Division to the Fire and EMS Programs Division and established a dedicated EMS branch within the administration. This branch will participate in research, training, SLTT operational preparedness, and national stakeholder engagement.</p> <p>The USFA added EMS expert presentation and discussion to the 2023 USFA Summit on Fire Prevention and Control, including presentations on whole blood delivery in the field, increasing EMS capability to address the opioid problem across the nation, and addressing the unhoused challenges in communities. USFA is also establishing a working group to continue these discussions as part of the Fire Service National Strategy that will deliver recommendations to the USFA Summit in 2024.</p> <p>The NAC 2023 Report named the creation of an EMS-specific Emergency Support Function (ESF) as a potential outcome of recommendation 2023-02. While it is necessary to recognize and advance EMS as a profession and in disaster response, the USFA does not fully support or recommend forming a separate ESF, as defined in FEMA’s <a href="#">National Response Framework (NRF)</a><sup>1</sup> to achieve that goal.</p> <p>FEMA established a defined list of 15 ESFs to provide a clear structure for federal disaster response, with designated agencies tasked with delivering core capabilities to stabilize community lifelines. EMS falls into several ESFs<sup>2</sup> including:</p> <ul style="list-style-type: none"> <li>• <b>ESF #4 Firefighting:</b> Coordinates federal firefighting activities and supports resource requests for public health and medical facilities and teams.</li> <li>• <b>ESF #8 Public Health and Medical Services:</b> Provides health and medical support to communities and coordinate across capabilities of partner agencies.</li> </ul> <p>EMS also interacts and coordinates with several other ESFs including:</p>	

<sup>1</sup> [National Response Framework \(fema.gov\)](#), 4<sup>th</sup> Edition, page 8.

<sup>2</sup> [National Response Framework \(fema.gov\)](#), 4<sup>th</sup> Edition, page 21.



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- **ESF #2 Communications:** Provides and enables contingency communications required at health and medical facilities (e.g., Public Safety Answering Points (PSAPs), Medical Command).
- **ESF #5 Information & Planning:** Develops coordinated interagency crisis action plans addressing health and medical issues.
- **ESF #6 Mass Care, Emergency Assistance, Temporary Housing & Human Assistance:** Integrates voluntary agencies and other partner support, including other federal agencies and the private sector, to resource health and medical services and supplies.
- **ESF# 9 Search and Rescue:** Conducts initial health and medical needs assessments.
- **ESF #10 Oil & Hazardous Materials Response:** Monitors air quality near health and medical facilities near the incident area.
- **ESF #14 Cross-Sector Business & Infrastructure:** Remain informed of and assesses cascading impacts of health and medical infrastructure or service disruptions, and deconflicts or prioritizes cross-sector requirements.

Under the NRF, EMS is also incorporated into two of the community lifelines—"Safety and Security" and "Health and Medical."<sup>3</sup>

The representation EMS has among the coordination of these ESFs and lifelines demonstrates its critical delineated role and integration within existing constructs. Recognizing that we need to elevate the EMS profession beyond disasters, we believe the best approach is to increase federal grant funding programs, including AFG and Staffing for Adequate Fire and Emergency Response (SAFER) programs, or seek changes to EMS policy through coordinating bodies like the Federal Interagency Committee on Emergency Medical Services (FICEMS). The USFA remains focused on increasing internal resources for EMS including training, research, health and safety, and stakeholder engagement to elevate EMS's role within FEMA. The USFA also continues to expand the EMS role in day-to-day emergency operations and disaster preparedness through participation in intergovernmental bodies, such as FICEMS and national advisory committees. The aim is to continue creating more resilient EMS and fire services across the nation through community risk assessment, risk reduction, and emergency response preparedness as outlined in the USFA's [2019-2023 Strategic Plan](#).

### Next Steps for 2024

While there is much to be accomplished, USFA recently conducted several meetings with national EMS organizations and invited them to be part of the #FireServiceOneVoice initiative. USFA has established and will continue monthly meetings with national EMS Organization leaders to facilitate collaboration, inclusion, and equity. USFA also met with leadership of the United States EMS Licensure Portability Compact to evaluate existing compact states and collaborate to advance the compact to include other states in 2024. USFA has additional information sessions planned with this group. USFA NFA has added EMS

<sup>3</sup> [National Response Framework \(fema.gov\)](#), 4<sup>th</sup> Edition, page 13.

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continuing education units to existing courses and is developing new curricula for the profession. Throughout 2024, USFA will leverage our relationships within FEMA and with fire and EMS stakeholders at the SLTT levels to work toward overall community risk reduction, fire and injury prevention, and sustaining emergency response capabilities thereby helping to build resilience across the nation.

### 2023-03: Emergency Management Vision and Identity

<b>Recommendation</b>	FEMA should refine its existing vision, purpose, and identity for emergency managers and provide a means to overcome barriers for entry and growth within the emergency management field.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented

As the threat-hazard landscape in the U.S. continues to evolve, it is important for the field of emergency management to continually reassess and refine its role. This is true for emergency managers at all levels of government and within the private and non-profit sectors. Emergency managers are increasingly called upon to handle crises outside of the “traditional” disaster arena and to support the largest, most complex problems facing the nation. FEMA recognizes the constantly changing nature of the emergency manager role and is working to lead through example and provide support for our SLTT partners.

Per Publication 1 (Pub 1), FEMA’s capstone doctrine, the agency’s vision is to have a more prepared and resilient nation. FEMA defines its vision, purpose, and identity through its Strategic Plan, which is intended to serve as a guide to the rest of the emergency management enterprise. The Strategic Plan includes specific objectives for promoting nationwide readiness and strengthening the emergency management workforce. The success of the 2022-2026 FEMA Strategic Plan depends on the whole of community to pursue its goals and objectives together. To inform the Strategic Plan, FEMA conducts a robust environmental scan of internal and external evidence to assess its operating environment, identify key issues, and determine capability gaps that could impact both the future of FEMA and the nation. In addition, FEMA collects perspectives and input from a diverse range of stakeholders to distill the most critical challenges facing the emergency management community. FEMA is embracing its leadership role in emergency management by expanding international engagements to further strengthen the emergency management community. FEMA will continue to leverage a comprehensive approach to strategic planning in future iterations.

#### Next Steps for 2024

2024 is FEMA’s Year of Resilience and the Office of External Affairs is infusing all of FEMA’s messaging to reflect this national call to action centered around five campaign themes:

- Readyng individuals, households, and communities

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- Training and resourcing a skilled emergency management workforce
- Building local capacity to withstand tomorrow’s hazards
- Enhancing response capabilities at all levels
- Enabling effective and efficient recovery

FEMA’s communication products will help individuals, families, communities, and businesses develop more effective and inclusive response, recovery, and resilience strategies.

In 2024, FEMA’s Office of External Affairs will increase agency focus on recruitment and outreach to key groups, including undergraduate and graduate students. This initiative shows FEMA’s commitment to reducing barriers to access by investing in the next generation of emergency managers. In Feb. 2024, FEMA increased outreach to recruit students from Minority Serving Institutions, such as Historically Black Colleges and Universities (HBCUs) and Tribal Colleges and Tribal Universities (TCUs), for FEMA’s 2024 summer internship program.

FEMA is better able to serve the needs of diverse communities when its leadership and staff reflect the communities it serves. In an effort to reach the disability community, the Office of Equal Rights will sponsor a FEMA Disability Mentoring Day event. Held in October during National Disability Employment Awareness Month, this workshop promotes career development for people with disabilities to overcome barriers for entry into the field of emergency management. In 2024, we will expand outreach to the broader public and increase promotion for FEMA employees.

By expanding our reach to faith and community-based organizations, we are shaping how people see the role of an emergency manager and the value of emergency management. We are broadening our reach to include an increased diversity of organizations. In addition to the recent Memorandum of Agreements (MOA) signed with the Rosalynn Carter Institute for Caregiving, NAACP and The Climate Initiative, FEMA will sign an MOA with Operation Hope and Islamic Relief USA in 2024. We are also forging a new partnership with the National Endowment for the Arts and are investigating ways to deepen our work together to reach artists and cultural institutions while hosting more public events focused on emergency management and outreach to caregivers.

### 2023-04: Workforce Data Culture

<b>Recommendation</b>	FEMA should focus on changing the workforce culture to embrace a “share by default” vision for the agency’s enterprise data services, information, analytics, and geospatial capabilities.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

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[FEMA's 2023-2027 Data Strategy](#) establishes securely sharing data by default and prioritizing data access as an underlying principle of its work. Key to achieving this goal is adjusting the way we handle data access and ensuring the related dataset information and business context are made available. If a program opts out of sharing particular data, it must be justified in terms of law or policy (e.g., Personally Identifiable Information (PII) or sensitive financial data).

This year, FEMA's Enterprise Analytics Division (EAD) initiated an update to FEMA Directive #262-1: Data Sharing and began work on developing a new companion instruction. These two documents will enable FEMA to create policies for appropriate data sharing with internal, external, and public stakeholders, as well as establish a common understanding of requirements to facilitate compliance and accountability. In concert with this initiative, EAD took steps to streamline the required review process prior to sharing data outside the agency by developing an Enterprise-Wide Privacy Threshold Analysis (PTA) for Sharing Aggregate and Desensitized Data. Reviewed and analyzed by the FEMA Privacy Branch, in consultation with the DHS Privacy Office, a PTA serves as the official determination as to whether the system, program, technology, or rulemaking is privacy sensitive (i.e., involves the collection and use of PII) and requires additional privacy compliance documentation. This new Enterprise PTA allows programs to share aggregate data—if the data is desensitized—using approved techniques, share data more quickly and proactively, and build data products that will not require additional privacy reviews by FEMA or DHS Privacy. In 2024, EAD is increasing access to data and analytics training to all FEMA employees, with a focus on improving data literacy and promoting a “share by default” culture.

Consistent with other DHS components, FEMA has created a “Senior Counselor for Technology, Strategy, & Delivery” position in the Office of the Administrator, charged with encouraging more effective use of technology and data and realizing the Administrator's vision of being a more data-informed agency. This role is also responsible for improving the customer experience across the agency and encouraging a more customer-centric approach to building products and services.

FEMA's Enterprise Data and Analytics Modernization Initiative (EDAMI) is also helping the agency realize a “share by default” culture through the development of the FEMA Data Exchange (FEMADex). This scalable, cloud-based data platform is easily integrable with all of the agency's data source systems and can ingest and serve the full range of agency (and relevant external) structured, semi-structured, and unstructured datasets and analytics products. The EDAMI program has implemented a change management framework to ensure a comprehensive and coordinated approach is in place that provides direction and purpose for all activities. A specific objective of the change management framework is to reinforce the “share by default” mindset for data and analytics products across all of FEMA. EDAMI has prioritized efforts to promote sustained stakeholder engagement and provide access to FEMADex over the next year. The EDAMI information effort promotes clear, consistent messaging on what users can do with FEMADex, how it benefits them, and how it supports

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FEMA’s new “share by default” data culture. EDAMI has also staffed a product management office to ensure that this data platform is built around customer needs and providing a positive customer experience to both internal data scientists and analysts as well as external stakeholders.

FEMA’s Recovery Directorate, as a FEMADex early adopter, continues to engage its workforce to build privacy and data sharing awareness. The Recovery Directorate has assigned staff whose official duties are to expand and streamline data sharing with SLTTs, voluntary organizations, the U.S. Department of Housing and Urban Development (HUD), the U.S. Small Business Administration (SBA), the U.S. Department of the Treasury, and the American Red Cross. The Individual Assistance (IA) Division, in partnership with the Recovery Reporting and Analytics Division (RAD), also plans to release the *Privacy and Data Sharing Implementation Guide* in early 2024. This guide will provide comprehensive internal guidance on the roles, responsibilities, requirements, and processes for sharing FEMA PII with our partners. The guidance aims to provide clear and consistent instructions for sharing PII that ensures survivors have access to all available assistance, their PII is safeguarded, and FEMA and external partners comply with the Privacy Act and related data sharing authorities.

The broader FEMA geographic information system (GIS) community will continue sharing by default by distributing publicly shared geospatial layers, data, web maps, and products via ArcGIS Online and the FEMA Geospatial Resource Center. Concurrently, FEMA will work to address barriers that hinder the achievement of a “share by default” culture by examining requisite processes, policies, existing contracts, and enabling technologies, as well as incorporating “share by default” requirements into future procurements. As an example, at times FEMA cannot purchase a broad enough license to share data or imagery publicly and/or own the imagery for the entire disaster response and recovery lifecycle (i.e., years). Geospatial data may be licensed, copyrighted, or otherwise restricted by our partners and agreements.

### Next Steps for 2024

In 2024, FEMA’s Office of Policy and Program Analysis will increase access to data and analytics training to all FEMA employees, with a focus on improving data literacy and promoting a “share by default” culture. As development of the FEMA Data Exchange (FEMADex) continues, OPPA will also implement “share by default” access for new FEMA data sources added to this data platform, providing FEMA analysts with access to all non-sensitive data by default while controlling access to sensitive data. The Individual Assistance (IA) Division, in partnership with the Recovery Reporting and Analytics Division (RAD), will also release the *Privacy and Data Sharing Implementation Guide*, which will detail the roles, responsibilities, requirements, and processes for sharing FEMA PII with our partners. Finally, FEMA will work to address barriers that hinder the achievement of a “share by default” culture by examining existing contracts and enabling technologies, as well as incorporating “share by default” requirements into future procurements.

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<b>2023-05: Recovery Management Assistance Team</b>	
<b>Recommendation</b>	FEMA should develop a Recovery Management Assistance Team (RMAT) at each FEMA Region or provide all of the appropriate funding and resource support for the National Disaster Recovery Framework (NDRF) Federal Disaster Recovery Coordinator (FDRC) and empower the interagency working group to identify and fully staff Federal Recovery Support Function (RSF) teams.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>FEMA recognizes the value that appropriate funding and resource support would bring for the NDRF to keep up with the increased number and complexity of disasters the U.S. is experiencing. Support for not only FEMA, but also RSF partners, would help recovery operations nationwide. Starting in 2023 FEMA revised the Interagency Recovery Coordination (IRC) process with a focus on standardizing the process through which RSFs deliver recovery assistance to impacted SLTTs.</p> <p>Additional funded positions for FEMA Regions to grow both their disaster recovery capacity as well as steady state relationship building with SLTT partners would make a significant impact. This effort began in FY2023 with newly funded positions in each Region, but additional support would allow the Regions to scale this capacity more quickly. These new positions are steady state recovery planning roles designed to help build SLTT capacity and guide partners through preparations for recovery missions (i.e., building state disaster recovery frameworks, state RSFs, and pre-disaster housing plans). Investment from within the Regions, who serve as the main point of contact to SLTT partners, is a key area of growth to supporting IRC at a regional level. In 2023, ICD stood up a Regional Development function to support FEMA regions in strengthening their interagency, SLTT, and non-governmental coordination before, during, and after disasters.</p> <p><b>Next Steps for 2024</b></p> <p>FEMA is targeting implementation of Navigation Teams to bridge the transitions for applicants that experience the longest recovery timelines. These teams are comprised of the Program Delivery Manager (PDMG), steady-state points of contact from the Regional Office and Consolidated Resource Center (CRC), and a roster of technical experts needed for the recovery. These teams will build and maintain sustained relationships with FEMA staff that last beyond the life of the Joint Field Office (JFO) and ensure access to resources and subject matter experts across field, regional, and CRC staff for the projects that take the longest. FEMA currently has Navigation Teams assisting in New Hampshire and Hawaii. The New Hampshire team expedited the early completion of site inspections for complex facility damage from multiple events to streamline Public Assistance delivery for the Applicant. The</p>	

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Hawaii team was able to use aerial imagery, geospatial data, and other publicly available information to develop baseline cost estimates for significantly damaged sites within the burn scar. In other words, FEMA is “doing their homework” as described by Hawaii in coming to the table with an initial estimate using the expertise of the CRC engineers, technology, and other available public data. The development, build out, and resourcing of the Navigation Teams are still on going. In 2024, additional teams are being formed. Early successes indicate streamlining the delivery of Public Assistance by helping Applicants to reduce the burden and expedite assistance. This effort began in FY2023 using existing positions in each Region and CRC, but additional support would allow for scaling this capacity.

### 2023-06: COVID-19 Lessons Learned

<b>Recommendation</b>	FEMA should study the lessons learned and smart practices identified from the various COVID-19 related recovery grant programs including Coronavirus Relief Fund (CARES) and the Coronavirus State and Local Fiscal Recovery Funds (ARPA) and provide a presentation to the 2024 NAC with any findings that apply to FEMA's disaster recovery grant programs.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

FEMA is continuing to develop lessons learned about the coronavirus disease of 2019 (COVID-19) recovery grant programs based on after action reports, stakeholder feedback, and data collected from various sources. Continuous improvement is an integral component of FEMA’s delivery model. The outcome of this work supports the 2022-2026 FEMA Strategic Plan goal of removing barriers to FEMA programs through a people-first approach. Response to and recovery from the COVID-19 pandemic resulted in an extensive effort by many agencies. Coordination with numerous departments across all the agencies that supported the nation during the pandemic was an enormous undertaking. Congress has appropriated over \$4.6 trillion to multiple federal agencies to assist SLTTs in addressing immediate needs in responding to COVID-19.

The Coronavirus Aid, Relief, and Economic Security Act, 2020 (CARES Act) and the American Rescue Plan Act, 2021 (ARPA) provided flexible supplemental funding to state, local, tribal, and territorial (SLTT) governments for a broad range of eligible uses to support COVID-19 response and recovery. The flexibility provided by the CARES Act and ARPA funding gave SLTT governments the ability to define and support their unique COVID-19 related needs in a way that the narrower requirements of the Stafford Act could not. This made CARES Act and ARPA funding far easier to administer for SLTT governments.

FEMA agrees that the flexibility of these supplemental funding programs hold many lessons. While the statutory requirements of the Stafford Act do not allow FEMA to implement this type of grantmaking, we agree to evaluate the CARES Act and ARPA programs and work

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with the U.S. Department of Treasury's Office of Recovery Programs to identify the benefits and challenges of these programs.

In addition, FEMA identified a number of lessons learned from providing Stafford Act assistance during a nationwide disaster. For example, FEMA's authority to respond to COVID-19 in some cases overlaps with that of other federal agencies. The passage of the CARES Act and ARPA provided SLTT governments financial assistance from multiple funding streams across the federal government leading to difficulty in ascertaining which agency had the funding authority for various costs and which agency should take precedence when there is overlap.

Given the need for SLTTs to quickly address the public health threats of COVID-19 and the funding availability from several federal agencies for this purpose, FEMA's Public Assistance (PA) program provided applicants with the flexibility to determine which sources of funding would best meet their needs, subject to the purpose and eligibility requirements of each federal program and funding source. Additionally, the PA Program also adapted internally, developing critical strategies to adjust for a lack of available staff. For example, through the implementation of "Direct Application," PA developed an applicant-centric, simplified application process that allowed applicants to apply directly to FEMA for PA assistance without FEMA staff support.

The Coronavirus Response and Relief Supplemental Appropriations Act, 2021 and ARPA authorized FEMA's Individual Assistance (IA) program to provide financial assistance for funeral costs related to COVID-19 at 100% federal cost share. As a result, FEMA developed the COVID-19 Funeral Assistance, Individuals and Households Program Policy (Interim), which, due to the unprecedented number of deaths caused by COVID-19, streamlined the delivery of funeral assistance to include minimizing the documentation review typically required for award.

Based on the lessons learned from implementing the Interim Policy, the IA program will assess its current Funeral Assistance policy, as found in the [Individual Assistance Program and Policy Guide, version 1.1](#) (IAPPG), and determine if updates should be made to streamline the delivery of funeral assistance as part of IA's standard timeline of updating the IAPPG.

FEMA recognizes that applying the lessons learned and smart practices identified from the various COVID-19 related recovery grant programs can improve program effectiveness and efficiency. In 2024, FEMA plans to publish the Public Assistance Program and Policy Guide (v. 5) which will incorporate many of the lessons learned from COVID-19. FEMA's Recovery programs would welcome the opportunity to brief the 2024 NAC on the lessons learned in this context.



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### Next Steps for 2024

As part of FEMA's update to PAPPG Version 5, the Public Assistance Program will review the NAC's recommendation related to incorporating the flexibilities and adaptations mentioned above while seeking ways to further streamline the PA process.

### 2023-07: Universal Design Framework

<b>Recommendation</b>	FEMA programs should utilize a flexible universal design framework* that is inclusive of individual U.S. territory needs and concerns regarding program implementation. [* Universal Design Framework will provide guidance for implementing and promoting a barrier-free process with the principle of multiple means of representation, expression, and engagement.]
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

FEMA recognizes the benefits to inclusive practices and agrees that the unique circumstances of all five U.S. territories must be considered in all phases of the emergency management framework to promote community preparedness, recovery, and resilience measures. Each community presents unique challenges that FEMA strives to support with inclusive practices. The five U.S. territories will not be overlooked in this endeavor. Their unique challenges should be reviewed and researched to identify best practices to streamline preparedness, mitigation, and recovery processes.

NAC Recommendation 2023-07 aligns with the 2022-2026 FEMA Strategic Plan for [Objective 1.3 – Achieve Equitable Outcomes for Those We Serve](#). FEMA supports the inclusion of the five U.S. territories in all indexes and toolkits to enhance community resilience and agrees that including them will aid in increasing the understanding of the unique needs and gaps of island communities. The data gathering pertaining to island territories will provide information on diversity, equity, inclusion, and accessibility shortfalls and aid in enhancing community resilience in underserved communities by closing gaps for each unique territory. FEMA's Public Assistance (PA) program has issued memos outlining ways to allow mitigation on improvement projects that include relocation and flexibility in the inclusion of codes and standards into the 50 Percent Rule calculations<sup>[1]</sup> to prevent unnecessary burden and delays. PA continues to explore other options for program changes to continue to simplify the program and remove barriers to achieve more equitable outcomes and support resilience in the territories.

While certain tools and datasets used in hazard mitigation may not include U.S. territories, this does not preclude territories from applying to FEMA's portfolio of hazard mitigation grants. Where there are any gaps or shortfalls, FEMA makes adjustments during the grant application cycle to use other data sets and program addendum inclusive of territories. For example, in

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cases where data may be unavailable for U.S. territories using the Climate and Economic Justice Screening Tool (CEJST), provisions are made for the use of alternative data, consistent with applicable law. Additionally, FEMA is currently developing the initial round of Community Disaster Resilience Zone (CDRZ) designations for Tribes and territories, and considering flexibilities for implementing the FY23 BRIC NOFO provision requiring \$400,000 of funding to go towards the benefit of CDRZs. Understanding the challenges that identifying alternative data may present, FEMA will conduct an analysis to understand where commonly used data for FEMA programs lacks coverage in all FEMA areas of responsibility and attempt to work with responsible parties to increase coverage of such data and tools.

Furthermore, FEMA recognizes that Environmental and Historic Preservation (EHP) compliance is a critical element of all grant programs, and the application of relevant laws, regulations, and executive orders may vary among territories based on their unique natural and cultural resources. FEMA's Office of Environmental Planning and Historic Preservation (OEHP) is committed to working with FEMA programs and the territories to communicate EHP compliance requirements early in the project development stage and enhance customer service by adapting technical assistance to U.S. territory needs for EHP compliance.

FEMA further agrees that indexes and tools that do not include all five U.S. territories in formulas should be recognized as "incomplete" products and require timely revision.

### **Next Steps for 2024**

In 2024, Public Assistance is working to update the Consensus-Based Codes, Specifications and Standards for Public Assistance policy which defines the framework and requirements for consistent and appropriate implementation of consensus-based design, construction and maintenance codes, specifications, and standards for PA to promote resiliency and achieve risk reduction under the authority of the Stafford Act. This policy provides an expansive list of codes and standards Public Assistance will fund to ensure that applicants can build back to the latest, most resilient consensus-based standards available, which may help to simplify and streamline processes for applicants with a variety of circumstances including territorial partners. Additionally, PA provides funding for cost-effective hazard mitigation measures, which provide additional resilience opportunities over and above that which is provided by consensus-based codes alone. A comprehensive list of such resilience measures for hazard mitigation are provided at Appendix J of the Public Assistance Program and Policy Guide. Such mitigation opportunities may provide for retrofits to facilities which require additional cost-effective mitigation for future disasters. Finally, PA has been evaluating the BCEGS scoring tool as an incentive measure for applicants to receive a higher cost share on their projects during disaster recovery. These policy and program changes aim to expand access to opportunities for SLTT partners to build resilience in a way that suits their community. FEMA recognizes that each community has unique needs and challenges and will continue to identify new ways to partner with SLTT communities to address those challenges.

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<b>2023-08: Leadership in Nationwide Climate Resilience</b>	
<b>Recommendation</b>	FEMA should work with and request direction from the White House to designate a leadership role in building nationwide climate resilience, including the prioritization of the appointment and U.S. Senate confirmation of the FEMA Deputy Administrator for Resilience to lead that effort within the agency.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>FEMA recognizes the importance of filling presidentially appointed positions and supports the actions of the Administration to fill all political leadership positions. At present, FEMA is represented in seven White House-led interagency policy coordination and/or working groups to build resilience to climate impacts, including extreme heat, wildfires, drought, flooding, coastal threats, financial risks, and more, in alignment with Goal 2 of the 2022-2026 FEMA Strategic Plan, Lead Whole Community in Climate Resilience. FEMA also serves as the DHS representative to the US Global Change Research Program (USGCRP) and spearheaded the effort to become the first new USGCRP member in decades, and substantively contributed to the fifth National Climate Assessment and the recent White House Summit on Building Climate Resilient Communities.</p> <p>Additionally in 2023, FEMA completed its work on an updated organizational structure for FEMA Resilience. These organizational changes represent a major step forward for FEMA to address all hazards resilience as a unified organization, focused on accelerating outcomes, excellent customer service, and partnering productively with the whole community. FEMA Resilience established an Office of Resilience Strategy, intended to evaluate strategic risks and programmatic outcomes, develop strategies to achieve goals and objectives, guide Resilience-wide doctrine to align to shared priorities, and engage with Resilience stakeholders and customers to communicate our priorities and improve our collective outcomes and experiences. This new office also includes the Climate Resilience Integration Branch, which ensures that climate considerations and priorities are incorporated into policy, strategy, data, and program initiatives across Resilience. In addition, FEMA is developing National Resilience Guidance to assist our whole community partners in building community resilience.</p> <p><b>Next Steps in 2024</b></p> <p>Moving forward, FEMA is committed to leading climate resilience efforts for the whole community and has a number of key climate projects planned for 2024. FEMA is currently developing a Nature Based Solutions Strategy to support efforts in promoting nature-based solutions nationwide to increase the deployment of nature-based solutions. To improve the emergency management community’s literacy on climate science, FEMA’s Emergency Management Institute is developing a Climate Adaptation and Hazard Mitigation certificate program. FEMA will also lead the way in enhancing climate data for the whole community by updating and integrating the Climate Risk and Resilience (ClimRR) Portal to enable</p>	

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communities to integrate future conditions into hazard mitigation plans, building code adoption, and other critical local resilience endeavors.

### 2023-09: Resilience and Insurability

<b>Recommendation</b>	FEMA should build resilience and insurability for the most vulnerable communities by 1) providing financial incentives for low income homeowners and technical assistance for communities in vulnerable areas to build to higher standards, 2) convening the insurance and reinsurance industry to negotiate differentiated underwriting standards for specific hazards and more resilient housing, and 3) working with state insurance commissioners and industry partners to develop educational programs for homeowners on resilient codes and standards and options to enable continued insurability of their property.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented

FEMA recognizes the importance of building resilience and insurability for vulnerable communities through building standards, insurance, and related options and incentives. FEMA supports these efforts through a range of projects, resources, educational outreach, and technical assistance tailored to—and in collaboration with—stakeholders across the whole community.

#### Financial Incentives

FEMA works with industry partners to develop and deliver educational training programs in communities that cover the basics of the [National Flood Insurance Program \(NFIP\)](#), including resilient codes and standards, floodways, flood mapping, basement construction, and other aspects of the program that help communities reduce their flood damage. NFIP’s rating approach supports resilience for the most vulnerable communities in several ways:

- Rating calculation for insurance premiums now account for a building’s value, resulting in more affordable insurance for lower income households.
- Eliminating the underwriting requirements to obtain an Elevation Certificate, resulting in fewer barriers to purchase an NFIP policy.

FEMA administers the NFIP’s [Community Rating System \(CRS\)](#), a voluntary incentive program that recognizes and encourages community floodplain management practices that exceed the minimum requirements of the NFIP. CRS provides credit for adoption and enforcement of building codes, in addition to discounted flood insurance premium rates (up to 45%) to reflect the reduced flood risk resulting from the community’s efforts, such as higher regulatory standards, open space preservation, and other creditable activities.<sup>4</sup> There are

<sup>4</sup> See [CRS Coordinator’s Manual](#), 2017 Edition, p. 110-15 (referencing Activity 430, Higher Regulatory Standards, Section 432.h); *id.* p. 430-27 (describing two methods by which CRS provides credit for building codes).

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approximately 1,505 communities nationally that elect to participate in CRS. This is a small fraction of the more than 22,670 communities that participate in NFIP.

FEMA has also taken action on the Community Disaster Resilience Zones Act of 2022<sup>5</sup> (Act), intended to build disaster resilience across the nation by driving federal, public, and private resources to underserved communities that are especially vulnerable to natural hazards. On September 6, 2023, FEMA announced the initial designations of 483 CDRZs, with designations of Tribal Nations and territories anticipated in 2024. Further rounds of designations will incorporate methodological refinements developed in cooperation with SLTT partners. Through these zone designations, FEMA is prioritizing technical assistance resources to help communities access funding and programs that will build resilience, while also engaging with partners across the federal interagency, philanthropic, non-governmental organizations, and the private sector to help drive investment towards these communities to increase their resilience. Most directly, through this legislation, FEMA is able to provide an increased cost share up to 90% for BRIC grants that primarily benefit a CDRZ designated community. These efforts will help ensure that the built environment, including housing, in these communities is more resilient to the impacts of more intense and severe disasters. This should also foster a more attractive marketplace for insurance companies to increase availability and affordability of policies, thereby helping areas most in need of protection maintain access to hazard insurance, an important resource in managing risk.

### Convening Industry

FEMA Resilience utilizes its subject matter experts and professional networks to explore interests with insurance organizations, the U.S. Department of the Treasury, State Insurance Commissioners, National Association of Insurance Commissioners (NAIC), National Conference of Insurance Legislators (NCOIL), and others concerning public education on resilient codes and standards and options to enable continued insurability of property. The agency maintains relationships with a range of stakeholders active in this space, including companies in the [Write-Your-Own \(WYO\) program](#), agency reinsurers, federal and SLTT partners, and other non-governmental and community organizations.

While FEMA's primary interaction with insurers and reinsurers is related to its management of the National Flood Insurance Program, FEMA is also authorized to study other perils that lack insurance protection from public or private sources and assess whether insurance protection is feasible. FEMA is eager to partner with the NAC on how best to apply this authority to the insurance community and the federal interagency in order to better inform and harmonize public and private sector resilience investments and insurability.

FEMA is committed to working with its partners to identify ways to change its underwriting authorities in a way that builds resilience. For example, FEMA has submitted a legislative proposal to Congress that would authorize the Administrator to eliminate coverage for new construction in high-risk areas. FEMA also supports efforts to disclose flood risk to home buyers, so they have the best information available to inform purchase decisions.

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<sup>5</sup> [Pub. L. No. 117-255](#), creating 42 U.S.C. § 5136.

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### Educational Programs for Homeowners

FEMA continues to lead efforts to promote building codes as a means of increasing the resilience of residential homes across the U.S. In our interactions with insurance commissioners and industry partners, we can socialize these efforts and support their outreach initiatives. FEMA works through industry partners, including its support of the Federal Alliance for Safe Homes (FLASH), who created the [No Code. No Confidence – Federal Alliance for Safe Homes – FLASH® \(inspecttoprotect.org\)](https://inspecttoprotect.org) campaign which is designed to drive public action on building codes. Inspect2Protect empowers consumers to identify the building codes used in their community and understand relevant retrofits to improve home resilience.

### Next Steps for 2024

During Summer 2024, FEMA will identify additional Community Disaster Resilience Zones and intends to announce Territorial and Tribal Nation specific zones. Additionally, FEMA is working with key partners to enhance the current methodology to inform future CDRZ designations based on risk assessment tools, data, and methods updates. FEMA will partner with industry partners, the U.S. Department of Treasury, and other stakeholders to improve public education on resilient codes and standards and options to enable continued insurability of property. For example, in February 2024, FEMA engaged with more than 900 homeowners by hosting a booth at the International Builders’ Show and has also expanded capabilities through the hiring of a fifth Regional Building Code Coordination Specialist. FEMA also has on-going preparations to do engagements for Building Safety Month, including podcast appearances, blog posts, social media interaction, YouTube shorts, and more.

## 2023-10: Built Environment Resilience

<b>Recommendation</b>	<p>In order to more effectively improve resilience of the built environment, FEMA should encourage, increase funding opportunities for, and provide technical assistance to TSTLs to 1) conduct scenario studies to evaluate disaster impacts and disseminate findings, 2) inventory vulnerable buildings and lifeline infrastructure and, 3) retrofit existing vulnerable assets, particularly those essential for maintaining community resilience. FEMA should also explore ways the proprietary Building Code Effectiveness Grading Schedule (BCEGS) and Building Code Adoption Tracking (BCAT) effort are used and can be improved to increase the effectiveness of building code <i>enforcement</i> at the local level.</p>
<b>FEMA Response Decision</b>	<p>Agree</p>
<b>FEMA Implementation</b>	<p>Partially Implemented</p>

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FEMA provides a range of resources and support for SLTTs to increase building code adoption and effective enforcement.

FEMA is currently collaborating across agency components to better understand how to measure and estimate local infrastructure resilience and assess the relationships and impacts between infrastructure systems and community resilience and vulnerabilities. Part of this work will also entail a review of past disaster data in communities and conducting case studies to collect empirical data on the built infrastructure to better identify and understand indicators that support resilient infrastructure.

FEMA offers support for SLTTs conducting inventories, including published guidance, training, technical support, and funding. For example, FEMA has provided technical assistance and funding to Utah for decades related to its unreinforced masonry (URM) buildings, as demonstrated in the recently published [Utah K-12 Public Schools Unreinforced Masonry Inventory](#). Additionally, since 2018, FEMA has supported Washington with developing an inventory of URM buildings.

FEMA's Hazard Mitigation Assistance (HMA) programs include the Hazard Mitigation Grant Program (HMGP) and HMGP Post Fire grant, which provide funding after major disaster and Fire Management Assistance Grant declarations, respectively. Both programs help communities mitigate and maintain their community lifelines, including retrofitting infrastructure, addressing vulnerable properties, and developing resilience through innovative mitigation projects. Through HMGP's 5% Initiative and Additional 5% Initiative, applicants can use up to 10% of HMGP funding for building codes and standard projects. Additionally, up to 7% of HMGP funding can be used to support hazard mitigation planning and planning-related activities such as developing scenario studies of past or future disaster impacts, inventorying vulnerable properties, and assessing community lifeline infrastructure. HMGP and HMGP Post Fire also allow applicants to direct up to 25% of available funding or \$10 million, whichever is less, to HMGP Advance Assistance, which can be used to develop mitigation priorities and projects, including collecting data in order to identify areas with the highest risk, keeping an inventory of vulnerable properties, and identifying critical infrastructure that needs to be mitigated to maintain community lifelines during and after a disaster.

Following disasters, FEMA's [Building Science Disaster Support Program](#) can provide disaster support operations by assembling and deploying a Mitigation Assessment Team (MAT) to conduct building performance analysis of the event and disseminate observations. Based on the findings, MATs provide recommendations and guidance to improve resilient building repairs, retrofits, and construction. For example, in response to the growing risk and destructiveness of wildfires, FEMA published the [Marshall Fire Mitigation Assessment Team \(MAT\) Report](#) and seven accompanying technical advisories to support planners, emergency management professionals, and homeowners in implementing wildfire mitigation measures. Wildfire mitigation measures include using [ignition resistant materials](#), [reducing](#)

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[vulnerabilities at the joints and interfaces of exterior building components](#), and [landscape management](#). The [Hurricane Ian in Florida Mitigation Assessment Team MAT Report](#) was recently published and provided over 80 actionable recommendations and 3 recovery advisories with the objective of enhancing short-term recovery and long-term disaster resilience in the face of natural hazard events. The principal objectives of these recommendations are to improve building and community resilience and minimize the loss of life, injuries, and property damage that could result from future natural hazard events similar to Hurricane Ian. Building improvement areas recommended included: [above flood level design](#), [reducing loss of impact to critical facilities](#) and [reducing water intrusion through doors](#).

Various FEMA programs provide SLTTs with resources, technical assistance, and funding to improve the resilience of the built environment, such as conducting studies to evaluate disaster impacts, developing inventories of vulnerable buildings and lifeline infrastructure, and implementing retrofit programs for vulnerable assets.

The BRIC grant program uses the Building Code Effectiveness Grading Schedule (BCEGS) to competitively score criteria. FEMA encourages communities to apply for BCEGS at no cost to the community to enhance their competitiveness. FEMA's BCAT Portal is a tool used to visualize which codes are currently adopted for over 23,000 SLTT jurisdictions, and to help inform the community whether they are hazard resistant and if updates are necessary. By identifying jurisdictions that have adopted the current or next most recent editions of the model codes and have weakened natural hazard-resistant provisions, BCAT products can serve as high-level indicators of a jurisdiction's vulnerability to natural hazards. Additionally, FEMA's Public Assistance program can assist communities in providing funding for the enforcement and administration of adopted building codes for a period following a major disaster declaration.

### **Next Steps for 2024**

FEMA will develop program support materials that will help applicants and subapplicants better understand how they can leverage HMA programs, including through building retrofits and building code adoption and enforcement.

The Building Science Disaster Support Program will implement marketing efforts aimed to help educate and inform a diverse range of stakeholders on what the Building Science Disaster Support Program is and the benefits it brings to FEMA and the nation. Successful implementation of this plan includes increased internal program awareness and sustaining interest in program materials.



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<b>2023-11: Earthquake Preparedness</b>	
<b>Recommendation</b>	FEMA should increase our nation’s preparedness for earthquakes by 1) increasing funding to the National Earthquake Hazards Reduction Program (NERHP) beyond the Congressionally authorized and allocated amount and provide equal mitigation funding for territories and tribes, 2) updating Benefit Cost Analysis (BCA) requirements to more accurately capture the unique losses of earthquakes and unique benefits of associated mitigation activities, and 3) updating mitigation grant scoring criteria to more accurately capture the benefits of structural retrofits and other seismic mitigation activities.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>FEMA has several programs that provide support for seismic mitigation activities, including the National Earthquake Hazards Reduction Program (NEHRP), HMGP, BRIC, and the Safeguarding Tomorrow Revolving Loan Fund (STRLF).</p> <p>NEHRP legislation states that funding must be allocated to states and territories, however, federally recognized Tribal Nations may also apply as subrecipients to states participating in NEHRP programming. Although this is not explicitly stated in current NEHRP grant guidance, FEMA will work to update the guidance with language to be inclusive of federally recognized Tribal Nations in the next released notice of funding opportunity (NOFO). Additionally, FEMA will consider budget allocation priorities and opportunities to increase funding for NEHRP.</p> <p>FEMA’s Safeguarding Tomorrow Revolving Loan Fund provides capitalization grants to participating states, eligible federally recognized Tribal Nations, territories, and the District of Columbia. These capitalization grants establish revolving loan funds for mitigation projects and activities to increase resilience and mitigate the impacts of events such as earthquakes. FEMA does not limit or restrict project types for this funding beyond the limitations in statute, providing additional flexibilities to applicants that other grant programs do not afford.</p> <p>In September 2023, the Benefit Cost Analysis (BCA) Toolkit Seismic Structural Module Methodology released an updated module—the Seismic Structural Full Data Module. This module can be used to accomplish the process of evaluating earthquake hazards and risks and developing retrofits, as described in ASCE/SEI 41-17. The module was adjusted based on feedback from regions, states, and local communities on the west coast. FEMA will monitor feedback for the changes implemented and their efficacy in increasing the ability to demonstrate cost effectiveness for seismic projects over the next one to three years.</p> <p>FEMA’s HMGP provides mitigation funding to states, Tribal Nations, and territories that receive a major disaster declaration. HMGP funding can be used to mitigate both public and private property and community infrastructure from earthquakes and related landslide and wildfire hazards. HMGP does not utilize a grant scoring criterion. Instead, projects are</p>	

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selected by the applicant. FEMA reviews projects for eligibility, technical feasibility, cost-effectiveness, and compliance with EHP requirements.

The BRIC program is another HMA program that can also provide funding for seismic mitigation projects, including both structural and non-structural retrofits as well as earthquake early warning systems. The scoring criteria for the BRIC National Competition is set each year based on administration and agency priorities. It does not contain criterion to address specific hazards, but follows the priorities around climate resilience and equity, as well as building codes, nature-based solutions, and infrastructure. Projects that meet multiple priorities typically score higher and are more likely to be selected.

### Next Steps for 2024

FEMA will update the NEHRP guidance to explicitly encourage the participation of federally recognized Tribal Nations to apply in the next released notice of funding opportunity (NOFO).

## 2023-12: Risk Communications Program

<b>Recommendation</b>	FEMA should work with other federal agencies and where appropriate TSTLs, private sector, and civil society to develop and implement a long-term coordinated risk communication and public awareness strategy to encourage behavioral change by providing communities, elected officials, and individuals with targeted, timely and relatable messaging about expected impacts from climate change and other hazards.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

The beginning of 2024 launches FEMA’s Year of Resilience, which is a FEMA-wide coordinated effort to spur actions that build resilience for our nation today and meet the threats of tomorrow. FEMA’s Year of Resilience is an opportunity to share best resilience practices, advance new innovative ideas and protect even more Americans against disasters. The Year of Resilience builds upon efforts to increase knowledge of the evolving risk landscape and moves toward the belief that every stakeholder can make a difference.

FEMA is working with internal and external partners to integrate climate change messaging into its overarching narrative. FEMA’s approach leverages different types of platforms and channels to encourage behavioral change and explain FEMA’s role related to climate to a diverse set of stakeholders. Our climate messaging is shared through videos, advertising campaigns, regional and local meetings, email newsletters, and on social media. Throughout all leadership talking points and presentations, messages on climate are incorporated to ensure our work is being highlighted and to maintain consistency across leadership speaking opportunities.

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For maximum impact, FEMA is both creating new climate messaging as well as integrating our climate messaging into other communication initiatives. In the summer of 2023, FEMA launched a new campaign called #SummerReady, to highlight the impact of extreme heat and provide preparedness tools for individuals, households, and communities most at risk for heat hazards through social media, stakeholder focused webinars and new products like the *Disaster Preparedness Guide for Older Adults*. In addition, FEMA collaborated with DHS to host an Extreme Heat Summit where more than 1,000 individuals registered from across SLTT organizations. Prior to the Extreme Heat Summit, FEMA [announced](#) a first-of-its-kind resource guide: [Guidance on Extreme Heat for Local, State, Tribal and Territorial Leaders](#), which amplifies four important actions that can serve as a foundation to build resilience to extreme temperatures. The four actions are: make an extreme temperature response plan, conduct a threat and hazard identification and risk assessment, plan for and adapt to future conditions, and adopt and enforce natural hazard-resistant building codes that can protect communities against extreme temperatures. From assigning heat officers, to integrating heat in response and resilience plans, to standing up outdoor misting stations and cooling centers, the guide provides tangible examples of the ways local communities can act today to adapt for the years ahead.

Through its Risk Mapping, Assessment, and Planning (Risk MAP) program, FEMA is also engaged with other federal agencies and SLTTs to understand, communicate, and reduce all-hazards risk throughout communities participating in the NFIP and continues to expand engagement to reach non-NFIP participating communities. The Risk MAP program coordinates the Resilient Nation Partnership Network (RNPN) to convene, discuss, and advance communications and resilience challenges across government agencies and sectors, and will continue to do so through its annual forum. Additionally, the Risk MAP program continues to conduct customer understanding and customer experience analysis to better understand trusted messengers, messages, and opportunities for coordination and deployment of more strategic and effective communications and engagement regarding natural hazard risk and risk reduction.

In November of 2023, FEMA's National Integration Center released "[Planning Considerations for Cyber Incidents: Guidance for Emergency Managers](#)." Developed in collaboration with the Cybersecurity and Infrastructure Security Agency (CISA), the guide supports state, local, tribal, and territorial emergency managers in understanding, preparing for and executing their roles and responsibilities related to cyber incidents. Key aspects of cyber incident preparedness relating to risk communication included in the document are:

- Engaging service owners and operators;
- Identifying cyber dependent critical services and related dependencies;
- Prioritizing and planning for service and system disruptions; and
- Providing integrated communication and public messaging.

This guidance provides a roadmap for personnel to work through steps in developing a cyber incident response plan. An effective and efficient response plan helps to reduce impacts, provide clear communication to those affected, and return functional services as soon as possible.

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While there is still much work to be done, FEMA is committed to educating, informing, and promoting activities to mitigate the impacts of climate-related and other hazards.

### Next Steps for 2024

FEMA’s Individual and Community Preparedness Division (ICPD) will create and maintain [protective actions guidance](#) for more than 15 hazards that highlight steps individuals can take to prepare for, keep safe during, and recover from a disaster. This maintenance includes reviewing new research and updating products to ensure the public has the most up to date protective actions guidance and research. These actions help people ensure individual safety, promote response training, and reduce loss of life and property.

ICPD will publish protective actions guidance for two previously unpublished hazards, climate change and power outages, and updated hurricane and flood guidance to FEMA’s [Protective Actions Research Home Page \(fema.gov\)](#) in mid-year 2024. Last updated in 2018, research on best practices to prepare for, keep safe during, and recover from these events will be published to the Protective Actions Research Home Page in late 2024.

## 2023-13: Technical Assistance to Tribes, States, Territories and Locals

<b>Recommendation</b>	FEMA should enhance technical assistance for TSTLs to build long-term resilience. The agency should: 1) lead a study to better understand the landscape of resilience-building technical assistance across the federal government, 2) expand recovery grant programs to focus on building resilience capacity, and 3) actively partner with TSTL and civil society organizations to help build capacity of Community Disaster Resilience Zone (CDRZ) designated and other under resourced communities.
<b>FEMA Response Decision</b>	Partially Agree
<b>FEMA Implementation</b>	Partially Implemented

### Studying and Examining Resilience-Building Technical Assistance Across the Federal Government

FEMA recognizes the benefits of providing technical assistance to SLTTs to build long-term resilience. In 2023, FEMA completed two concurrent reviews of technical assistance being provided to SLTT governments and used the results to inventory technical assistance programs, develop recommendations to improve delivery of technical assistance, and sustain equitable access to technical assistance programs. The technical assistance programs inventoried during these reviews will be maintained in the [FEMA Recovery and Resilience Resource Library](#) among other tools.

The first review focused on technical assistance provided by the Federal Interagency. FEMA’s Mitigation Framework Leadership Group (MitFLG)’s Place-Based Technical Assistance Task

## **FEMA Responses to the NAC 2023 Recommendations**

Force (PBTF) completed this review to better understand the landscape of resilience-building technical assistance across the federal government. The internal PBTF Landscape Analysis Summary Report documented the current state of resilience-focused federal technical assistance across the interagency. This document also identified challenges, limitations, and gaps in current technical assistance efforts. FEMA is coordinating to provide the NAC a briefing on the Landscape Analysis Summary Report.

The second review, the internal Enterprise-Wide Technical Assistance (EWTA) Review, was led by FEMA Resilience and focused on technical assistance provided to SLTT jurisdictions by FEMA. The purpose of the EWTA was to inventory all agency technical assistance offerings, provide an analysis for program improvement, and document ways each offering can remove barriers to access, especially for underserved communities.

FEMA is also leading an effort to develop a Resilience Results Framework (RRF), a critical first step to better understand, measure, and study how FEMA programs individually and collectively improve resilience across the nation and in our communities. Building on best practices from international frameworks as well as existing federal resilience guidance, the RRF will articulate resilience outcomes that define what success looks like for FEMA. This outcomes framework will provide a better understanding of FEMA resilience outcomes and performance indicators, as well as the data landscape needed for measuring resilience; and inform resource allocation and stakeholder coordination decisions.

Additionally in 2023, FEMA completed its work on an updated organizational structure for FEMA Resilience. These organizational changes represent a major step forward for FEMA to address all hazards resilience as a unified organization focused on accelerating outcomes, providing excellent customer service, and partnering productively with the whole community. As part of the reorganization, FEMA Resilience established an Office of Resilience Strategy charged with evaluating strategic risks and programmatic outcomes, developing strategies to achieve goals and objectives, guiding Resilience-wide doctrine to align to shared priorities, and engaging with Resilience stakeholders and customers to communicate our priorities and improve our collective outcomes and experiences. In addition, FEMA is developing National Resilience Guidance to assist our whole community partners in building community resilience. The guidance will include a resilience maturity model that represents how resilience principles can be integrated into planning to mature community resilience.

### **Expand Recovery Grant Programs to Focus on Building Resilience Capacity**

FEMA PA recognizes the benefits of having a thorough process to enhance technical assistance for SLTTs to build long-term resilience capacity. The Bipartisan Budget Act of 2018 amended Section 406(b)(3) of the Stafford Act to authorize FEMA's PA program to increase the federal cost share from 75% to 85% for specified measures that increase readiness for and resilience from a major disaster. FEMA is targeting March 2024 for a public comment on our draft policy and May 2024 for issuance of the policy. This policy will provide additional incentive for SLTT partners to include hazard mitigation measures in their project proposals.

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Similarly, FEMA continues expanding hazard mitigation measures through the [Public Assistance Program and Policy Guide \(PAPPG\)](#), Appendix J: Cost-Effective Public Assistance Hazard Mitigation Measures. Appendix J provides a list of cost-effective mitigation measures applicants may use to increase resilience of their facilities. Public Assistance continues to work on expanding this list to include more hazard mitigation options for applicants to use. For instance, in the draft PAPPG version 5 (targeted for public comment in February 2024), Appendix J includes additional draft options for resilience on PA projects.

FEMA's PA Program can also fund costs associated with the enforcement and administration of locally adopted building codes after a major disaster declaration. After major disasters, there are often shortages in permitting personnel or other resources to efficiently administer these services so that facilities are rebuilt in a timely manner. This authority ensures that local jurisdictions have the resources they need to effectively enforce building and floodplain management ordinances in their communities. FEMA's Public Assistance program provides funding for disaster-damaged facilities in compliance with nationally recognized consensus-based codes and standards. This ensures that we are requiring applicants to build back in such a way that they are more resilient to future disasters. Through the implementation of these authorities, local government officials will receive the requisite financial assistance to restore their facilities using building codes and standards that will enhance their communities' long-term resilience.

### **Actively Partner with SLTT and Civil Society Organizations to Build Capacity of CDRZ and Other Underserved Communities**

FEMA is actively working to establish collaborative partnerships with critical stakeholders to further investment in, and direct support to, CDRZ designated communities. This effort includes coordinating internally with FEMA program offices to provide technical assistance that can help communities to identify needs and access resources. FEMA is also working through interagency coordination bodies, like the MitFLG and Thriving Communities Network, to identify other available Federal resources for these communities and work collaboratively to provide assistance in a coordinated place-based approach. Further, in 2024, FEMA will continue to build on relationships with non-governmental entities, including nonprofit, philanthropic, and private sector organizations, to identify available resources that can be directly invested into these communities to build capacity, build or improve infrastructure, and ultimately facilitate overall community resilience. Each of these stakeholders has a unique and important role to play in the development and adoption of the CDRZ initiative. FEMA acknowledges interagency coordination and public input are crucial for refining the determination methodology and developing the resources to provide to the communities.

### **Next Steps for 2024**

Resilience will build on the first round of CDRZ designations for states, Tribal Nations, and territories, and ensure Resilience programs are driving financial and technical assistance resources to these communities to help accelerate resilience. Additionally, Resilience aims to establish programmatic capabilities for regularly updating CDRZ designations by creating a

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transparent, rigorous, and continuously improved process grounded in the best available data, analysis, and stakeholder input, while providing the necessary data management and analysis support for the CDRZ program. Efforts will commence to develop a voluntary resilience and hazard mitigation project certification process as mandated by the CDRZ Act, with stakeholder engagement facilitated through the Request for Information (RFI) process and thorough adjudication of stakeholder feedback.

### 2023-14: Mitigation Grant Programs

<b>Recommendation</b>	FEMA should allow mitigation grant applicants and sub-applicants for projects under \$1 million to provide a “narrative description” of the project’s cost effectiveness in lieu of a standard FEMA BCA and establish a sampling methodology for capturing benefits to reduce data collection and complexity burdens on TSTLs for all other projects.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

Legal authorities governing HMA programs authorize FEMA to fund mitigation measures that are cost-effective; however, there is no specific legal requirement about the type of methodology that must be used to determine cost-effectiveness. The Office of Management and Budget ([OMB Circular A-94](#)) provides general guidance on the elements that should be included in any method of economic analysis of government programs or projects.

Under FEMA’s HMA programs, cost-effectiveness is typically demonstrated through a benefit-cost analysis (BCA) using the [FEMA BCA Toolkit](#). Additionally, FEMA allows other methodologies for determining cost-effectiveness (in lieu of FEMA BCA), such as [precalculated benefits](#), or BCAs performed by other Federal agencies.

FEMA has partially implemented this recommendation through BRIC and FMA grant programs. For the Fiscal Year (FY) 2023 BRIC and FMA grant cycle, subapplicants may submit a cost-effectiveness narrative, rather than a BCA, for projects with a total cost of less than \$1 million FEMA has developed program support materials such as the [Demonstrating Cost-Effectiveness for Projects Less Than \\$1 Million](#), to help applicants and subapplicants develop narrative statements for projects with a total cost of less than \$1 million. Through the BRIC and FMA grant programs, and technical assistance, FEMA also aids certain entities (including EDRCs, federally recognized Tribal Nations, and sub-applicants with a hazard mitigation project within or primarily benefitting a CDRZ) with demonstrating cost-effectiveness.

#### Next Steps for 2024

FEMA has been working in concert on the updates to the BCA policies while concurrently working with other policies as noted in the response to recommendation 2023-15. FEMA is exploring revising the current policy to implement a streamlined cost-effectiveness process for

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HMGP projects with a total cost of less than \$1 million. HMA programs will continue to develop BCA streamlining tools, including the approach described in the NAC recommendation of utilizing a narrative for projects with a total cost of less than \$1 million.

### 2023-15: Benefit Cost Analysis Methodology

<b>Recommendation</b>	<p>FEMA should develop a more flexible BCA methodology for critical infrastructure of community-wide and cultural significance* by making allowances for projects that 1) provide a multitude of benefits, including the ability to address more than one hazard and benefits that cannot be easily quantified, 2) have a long-useful life, often 50-100 years or more; and 3) are designed to both withstand and be functional after disasters, including those events that occur less frequently but have an extremely large impact.</p> <p>[* Infrastructure of community-wide and cultural significance may include, but is not limited to, the following: transportation, water control, energy, and communication systems and critical healthcare, public safety, education, food support facilities, shelter, and public housing facilities.]</p>
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented
<p>FEMA appreciates the recommendation to provide a streamlined BCA process for critical infrastructure. FEMA will consider this recommendation in future program improvements. Recent BCA initiatives and updates related to this recommendation are detailed below.</p> <p>In part because of the NAC’s strong and consistent recommendations, The Office of Management and Budget (<a href="#">OMB Circular A-94</a>) was updated on Nov. 9, 2023, lowering the discount rate from 7% to 3.1%. FEMA is working to implement this provision for all HMA mitigation programs. This will help to reduce complexity for SLTT partners in the application process. Lower discount rates make it easier for projects with longer useful life (50-100 years or more) to demonstrate cost effectiveness (e.g., multi-hazard critical infrastructure projects).</p> <p>For the FY23 BRIC and FMA NOFOs, sub-applicants may submit a <a href="#">cost-effectiveness narrative</a>, instead of a BCA, for projects with a total of less than \$1 million. The cost-effectiveness narrative should include qualitative and quantitative data demonstrating the benefits and cost-effectiveness of the project. Based on this narrative, FEMA will validate the cost effectiveness and estimate a benefit cost ratio (BCR) of the proposed project during its review.</p>	



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FEMA’s BCA Toolkit supports the ability to incorporate more than one hazard and multiple benefits as recommended above and can attest that SLTT partners have successfully done so using this tool. FEMA supports continuing to promote awareness and training for this use of the toolkit with SLTTs.

FEMA’s PA mitigation training focuses on educating disaster field staff and BCA analysts on evaluating risk reduction at a community level by giving special considerations to increasing resilience of community lifelines and infrastructure with community-wide and cultural significance. Delivered by the Community Infrastructure Resilience Branch within the HMA Division, this training focuses on providing staff the skills and knowledge necessary to successfully complete a BCA.

FEMA’s OEHP is supportive of a flexible BCA methodology for critical infrastructure. A flexible BCA may result in additional projects that would not normally qualify for HMA grants, subsequently increasing the resilience of communities—including but not limited to critical infrastructure in underserved communities, many of which are historically located in areas with increased risks, such as flooding and other hazards. OEHP will coordinate with FEMA’s Floodplain Management, Risk Management, and HMA Programs as they consider future program improvements regarding a flexible BCA.

### Next Steps for 2024

FEMA will work to revise current policies to expand opportunities for Hazard Mitigation Assistance grant programs to access streamlined methodologies and BCA assistance.

## 2023-16: Local Government Training Programs

<b>Recommendation</b>	FEMA should partner with organizations that provide training to TSTL elected officials to deliver pre-disaster and just-in-time emergency management training programs so that elected officials understand FEMA’s role and processes, as well as their own role in emergency management.
<b>FEMA Response Decision</b>	Agree
<b>FEMA Implementation</b>	Partially Implemented

FEMA is currently implementing this recommendation through several programs and partnerships, a few of which are highlighted below.

FEMA’s training and education enterprise provides elected officials with a variety of learning solutions. For example, several free training and education opportunities are available to elected officials and community leaders through FEMA-funded partnerships with the National Domestic Preparedness Consortium (NDPC), the Naval Postgraduate School/Center for Homeland Defense and Security (CHDS), the USFA’s National Fire Academy (NFA), and the Emergency Management Institute (EMI). Additionally, FEMA has identified program areas to

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build additional comprehensive training opportunities for elected officials, such as environmental planning and historic preservation, response, and recovery, and will work to identify ways to increase training opportunities for partners in these program areas.

In 2023, FEMA created the FEMA Governors Orientation to support the unique needs of newly elected governors. This Governors Orientation, which was developed in partnership with the CHDS is a customized emergency management learning opportunity for first-term governors and their staff, tailored in duration and topics based on areas of interest and need. Governors and their staff meet with FEMA headquarters and regional leadership to learn about Stafford Act authorities, disaster declaration processes, consequence management, crisis management, continuity of government, and more. Governors are also offered a menu of additional available FEMA resources including exercises to build, test, and validate capabilities.

FEMA's Recovery program is also seeking to build a more deliberate, comprehensive training program geared towards elected officials. FEMA will incorporate topics beyond response such as recovery, planning, resilience, and disaster management. Developers of this training program may reach out to elected officials for input and discuss options for content, delivery, and certification.

### **Next Steps for 2024**

FEMA will continue to deliver its [suite of training for emergency managers](#) and elected officials while conducting place-based solutions that meet unique community needs to include delivery of just-in-time/active disaster training support, and work with the Federal interagency and emergency management non-governmental organizations to increase the awareness of the training's availability.