



Equity & Resilience Best Practices in Emergency Management

3.7.22

Background

Just one year ago on January 20, 2021, President Joseph R. Biden, Jr. released Executive Order 13985 to address **Advancing Racial Equity and Support for Underserved Communities Through the Federal Government** requiring agencies assess equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation and disability. Subsequent to the Executive Order, FEMA's Equity Enterprise Steering Group (ESG), co-chaired by the Office of Equal Rights and the Office of Response and Recovery, worked together to implement equity within FEMA's core values of compassion, fairness, integrity, and respect. ESG sought to integrate equity considerations in FEMA-wide policies, procedures, plans and guidance. The ESG directed that equity be at the core of FEMA's mission which is to increase America's resilience against disasters and sustain recovery when they do happen. Ensuring that all communities are treated in a fair, just and impartial manner advances the disaster recovery mission through an equity-focused approach. Changes FEMA makes with respect to equity will benefit communities of color who have historically been marginalized; aid individuals experiencing homelessness; support individuals with disabilities; and provide enhanced services to older adults and neighbors living in poverty -- including those who lost their livelihoods due to the pandemic.

What Does Equity Mean

FEMA also released its definition of equity as *"The consistent and systematic fair, just and impartial treatment of all individuals."* FEMA and its private sector partners are launching efforts to eliminate persistent poverty and inequality among historically underserved, marginalized, and adversely affected people of color, and those disadvantaged because of gender, age and disability. FEMA programs have modernized and evolved in recent disasters which may have unintentionally made it more difficult for traditionally underserved populations to gain access to federal disaster assistance. In addition, FEMA released a [Request for Information \(RFI\)](#) seeking public comment from April 22, 2021 to July 22, 2021 about underserved populations and those disproportionately affected by climate change. The RFI addressed FEMA regulations and/or policies that can be duplicative, overlapping, or contain inconsistent requirements making it difficult to navigate pre- and post-disaster assistance.

From an industry perspective, Judith Rodin, former president of the Rockefeller Foundation, in her book *"[The Resilience Dividend](#),"* defines resilience as the ability of any system to "prepare for disruptions, to recover from shocks and stresses, and to adapt and grow from a disruptive experience." She goes on to write that without a concerted focus on equity, climate change will continue to exploit existing gaps, limiting recovery and opportunity and prevent us from achieving socioeconomic resilience. In other words, we must plan and invest differently to build socioeconomic resilience and ensure equitable outcomes.

DRCA can contribute greatly to this ongoing dialog among all emergency management stakeholders to work collaboratively in reducing burdens, saving time and costs, increasing simplification and navigability, reducing confusion or frustration, and increasing equity in accessing FEMA programs, understanding that many underserved populations do not own a smart phone or have internet connectivity. It is the role and responsibility of emergency managers and their private sector partners to require sensitivity to the needs of all disaster survivors in the fair and equitable distribution of assistance. DRCA stands ready to support FEMA's objectives for greater equity in across the FEMA response and recovery programs for all using common sense in understanding the population we are serving while bolstering resilience to climate change.



DRCA recommends the following approaches to incorporate equity into FEMA’s emergency management programs:

- Because FEMA’s disaster assistance programs are administered in such a way where first-time applicants are not familiar with “FEMA speak” and are at a significant disadvantage to understanding federal regulations, it is recommended that FEMA revise their applicant and individual communications using plain language and clearly identify the current status of the application and, if applicable, needed documentation to overturn an adverse decision. FEMA could establish focus groups from a cross section of many underserved populations to review its existing communications and work to simplify the messaging using readability testing tools for ease of understanding and comprehension.
- Cost-share requirements can be prohibitive for underserved communities. Modification to current program guidance for underserved communities to request and obtain relief from cost shares could be developed. As a starting point, we recommend evaluating the potential for developing a cost-share adjustment mechanism wherein projects with a high benefit-cost ratio may be eligible for an increased federal share percentage in underserved communities. Other approaches can also be developed and incorporated into the existing programs.
- Resources for project development includes grant writing services and technical support for Benefit Cost Analysis (BCA) development, engineering studies, etc. Currently, existing successful mitigation and resilience applications are not available in an easy to access portal so those “starting from scratch” can review prior to commencing a grant writing exercise. Not having a template or sample grant application can create significant barriers for low impact communities. DRCA recommends increasing the funding available under resiliency and mitigation programs for capability and capacity planning to support grant seekers and the creation of a publicly accessible portal of existing/past grant applications to encourage participation.
- BCA development is an aspect of the mitigation grant application process that can be very time-consuming, technical, and expensive. We recommend that FEMA identify additional project types that would be suitable for pre-calculated benefits.
- Many underserved communities have significant vulnerabilities due to either a lack of critical infrastructure, crumbling infrastructure and/or a lack of infrastructure maintenance. As a result, the community is as vulnerable, if not more vulnerable than a community with a different economic stability of depth of resources. DRCA recommends that FEMA review opportunities to expand eligibility for the development of new infrastructure and focus on the impact of ineligibility on underserved communities when FEMA issues determinations of deferred maintenance. It poses a conundrum for underserved communities to be penalized for deferring maintenance yet these same communities need pre-disaster funding for consistent maintenance so they will have the opportunity post disaster to rebuild under FEMA programs.
- DRCA recommends that FEMA review opportunities to expand eligibility for the rebuild/replace of damaged infrastructure in underserved communities looking at geographical areas with low income or underinsured populations.
- Tribal populations are at increased risk for impacts due to climate change, as natural resources support first foods and other native lifeways, plus provide the cultural cornerstone of communities. As such, tribes are often more vulnerable to hazards and experience greater hardship during recovery due to identity loss when traditional knowledge and cultural artifacts are destroyed. Yet tribes are allocated significantly less pre-disaster funding than



state and local counterparts and must compete for this funding. Recognizing the disparities and these additional costs faced by the tribal nations supports the resiliency of all and FEMA must look at more equitable distribution of funding to include tribal communities.

- Some programmatic eligibility requirements for disaster assistance are more likely to impact traditionally underserved populations especially those from low-income communities. One notable example is the eligibility determinations related to pre-existing damage. If a home is determined to have pre-existing damage it is likely that the property owner will not be eligible for assistance even if the damage was exacerbated by the event. DRCA recommends FEMA look at structures as a whole to support repair opportunities under their program if it can be proven that the structure was exacerbated or impacted by the declared peril.
- The Individual Assistance application process can be difficult for underserved populations to navigate especially considering the interface of multiple related yet compartmentalized programs. Typically, this population can receive support through the use of a Disaster Recovery Center, however, in the pandemic environment establishment of DRCs were not practical. DRCA recommends that FEMA streamline disaster assistance processes and include case management services as a regular component of individual assistance declarations. We appreciated the direction former IA Director Chris Smith briefed during the NEMA 2021 Annual Forum on the flexibility and direction the program is continuing to transform and believe that streamlining the processes and applicants would further support this initiative.

DRCA carefully studied FEMA's categorization of the RFI commentary and is providing specific suggestions for implementation:

EDUCATION, OUTREACH & TECHNICAL ASSISTANCE

In order for FEMA to provide more education, outreach, and technical assistance in its recovery, mitigation, preparedness grant programs and in the National Flood Insurance Program, it can partner with the private sector in a variety of ways. A public-private partnership will support community preparedness activities, mitigation efforts, grant application processes, and floodplain management for FEMA-eligible entities, non-profit organizations, local governments and individuals.

Some specific programs identified include:

INFORMATION COLLECTION & DATA SHARING

FEMA collects and stores immense volumes of data and pre- and post-disaster information. Providing easy access to information that does not violate personally identifiable information (PII) practices allows for more in-depth reporting on demographics associated with disaster assistance. To advance equity, the collection and sharing of data and information allows FEMA and its partners to target solutions to meet the needs of those most impacted by disasters. Transparency of data empowers local non-profit and private actors to offer solutions to challenges directly impacting their communities. Case in point: Many organizations do not have the resources to complete the grant application paperwork necessary to qualify for FEMA assistance. By providing a transparent, easy to access platform for interested parties to review successful and unsuccessful grant applications is the best method to encourage participation. While guidelines, rules and phone assistance may be available for program help, nothing is more effective than actually seeing completed applications in their entirety.



PROCESS IMPROVEMENTS

The complexity of FEMA's application processes associated for all of its preparedness, recovery, and mitigation grant programs could be improved by reducing the number of steps required in the application processes and making changes to the documentation required for those applications. By making available actual successful completed applications as examples of what would position an applicant for success would be ideal. While underserved communities may not have access to technology, non-profits or case managers who facilitate these communities would benefit from FEMA increasing its transparency of previously submitted applications.

RECOVERY GRANT PROGRAMS

FEMA's Individual Assistance (IA) grant program is intended to serve individuals and households after disaster. Recent studies have looked into measuring how disasters may disproportionately impact those with the most needs in our communities, so it is vital that FEMA continues ensure equity within their programs. FEMA has made great strides in expanding eligibility and increasing transparency in the IA program. Of note, accessibility-related personal property costs are no longer subject to Individual Assistance maximum grant amounts per section 1212 of the Disaster Recovery Reform Act of 2018. FEMA has also expanded the level and type of documentation that can be used to demonstrate occupancy and ownership; both of which are required to receive IA funds from FEMA. Historically this requirement has prevented precariously housed individuals and those living in heirs' properties from accessing this funding.

The DRCA recommends that FEMA continue to take steps to simplify and streamline the host of grant programs that make up the Individual Assistance Program. Most notably we recommend that FEMA:

- Ensure the use of plain language when communicating with disaster survivors especially in the eligibility notification letter
- Support the coordination and remove barriers to responsible information sharing between the agencies and organizations serving disaster survivors to ensure a survivor-centered focus and timely response to survivor needs

The Public Assistance (PA) program should prioritize climate resilience and equity when providing assistance and review the cost sharing requirements for communities impacted by disaster. Utilizing the private sector to improve outreach and education, increasing engagement directly with local and Tribal governments, encouraging building resilient public facilities, and promoting responsible investment in resilient, nature-based solutions can lead to stronger equitable outcomes. DRCA strongly supports FEMA's current efforts to expand public assistance eligibility for non-profit organizations.

MITIGATION & PREPAREDNESS GRANT PROGRAMS

FEMA's mitigation grant programs, including the Building Resilient Infrastructure and Communities (BRIC), Hazard Mitigation Grant Program (HMGP) and the Flood Mitigation Assistance (FMA) programs, can all advance equity and promote resilient solutions for communities through mitigation grant funding. FEMA could reduce the complexity of the application processes and provide more education and technical assistance for communities to compete for funding effectively. DRCA recommends that FEMA make the calculations in FEMA's Benefit Cost Analysis (BCA) tool more equitable for underserved communities.



In addition, DRCA recommends that:

- Alternative BCA methodologies be more widely utilized, and FEMA staff be trained on ways to better review and assess BCAs using alternative methodologies;
- The conditions in which pre-calculated benefits can be used be expanded

BCA 6.0 training be improved to include how to find compliant inputs to complete the BCA tool as opposed to the current training that teaches which button to click and not the actual documentation to be input. Also, ensure that training be made publicly available through alternatives to classroom training such as an online option for grant seekers.

To strengthen FEMA preparedness grant programs, DRCA recommends that FEMA work with Congress to increase funding for all of its preparedness grant programs, increase focus on rural areas, better integrate its preparedness programs with its recovery and mitigation programs, track data to validate the benefits of risk reduction achieved from preparedness grant funding investment, and increase the mental health focus on the psychological impacts of terrorism and traumatic events.

NATIONAL FLOOD INSURANCE PROGRAM (NFIP)

DRCA recommends that FEMA work with the entire flood community (agents, Write Your Own (WYO) insurance companies, consumer groups, lenders and others) to raise the awareness of the importance of flood insurance and increase access for property owners through education and outreach. DRCA further recommends that FEMA work with the private insurance sector to increase private flood insurance as an alternative to NFIP. Floodplain management and mitigation planning initiatives could gain increased exposure through education, outreach, and technical assistance with the use of catastrophe models and tools used in the private property insurance arena. Climate justice advocates are working to document flooding impacts in vulnerable communities so that decisionmakers will recognize inequities and use strategies to assist those most negatively affected. And while governments are building new infrastructure and flooding barriers, often historically disadvantaged communities are not engaged even if these very communities are most affected. The lack of communication among stakeholders is a missed opportunity to coordinate and leverage efforts. Solutions to floodplain management challenges to improve resilience and mitigate the effects of flooding in an equitable manner can be achieved, for example, by promoting projects designed to boost resilience and deliver equitable, economic benefits that reduce flood vulnerabilities. Equitable flood resilience entails more than managing water and strengthening infrastructure assets so it is incumbent that FEMA work with all communities so they can adapt, respond, recover, and lean forward. FEMA can lead with the strongest solutions by embracing community leadership, convening all stakeholders to participate throughout the process, and share decision-making. As the waters rise, so too must water professionals and communities rise together to meet current challenges and whatever uncertainty the future holds.

DRCA recognizes that we need to create stronger partnerships with FEMA to better enable and support communities and underserved populations when it comes to resiliency and climate change. In the words of Warren D. Miller, FEMA National Advisory Council Equity Subcommittee Vice Chair “Equity must be baked into the front end of the federal declaration process, not an afterthought. Critical to the process is for decision makers to be intentional in all phases of the disaster management cycle to minimize discriminatory actions to prevent undesired outcomes that plague underserved and marginalized communities.”