



October 15th, 2019

Mr. Jeffrey Byard
Associate Administrator for the Office of Response and Recovery (ORR)
FEMA
500 C Street SW
Washington, DC 20024

Dear Mr. Byard;

On behalf of the disaster recovery contracting community, the Disaster Recovery Coalition of America (DRCA) is writing to request relief from the provisions of FEMA's September 23, 2019 Memorandum referencing "FEMA Contact with Public Assistance Recipient and Sub-Recipient Contractors." Our concern is with the consequences of reversing simple communication between FEMA and contractors, specifically, where the memo says, "FEMA should have no direct contact with contractors hired by recipients to perform disaster response and recovery work." We believe that provision is administratively burdensome and detrimental to the very same parties that FEMA seeks to support with its Public Assistance recovery grants. It also conflicts with one of the goals of FEMA's 2018 to 2022 Strategic Plan and is contrary to FEMA's Budget Overview justification provided to Congress.

Therefore, DRCA requests that FEMA either issue an expiration date for the memo or rescind it entirely. Our rationale is based on the following:

The memo is not compatible with FEMA's strategic plan. One of the three strategic goals in FEMA's 2018 to 2022 Strategic Plan is to "Reduce the complexity of FEMA." It states in part, that FEMA "...must do everything it can to.... reduce the administrative and bureaucratic burdens that impede impacted individuals and communities from quickly receiving the assistance they need." The September 23rd memo restricts communications between recipients' contractors and FEMA with the net effect of a reduction in contractors' ability to expedite recovery grant documentation. It lengthens the process and increases the recipients' burden. When processes are not simplified, costs increase to both FEMA and those who rely on FEMA for financial and operational support.

FEMA's budget authorization was based in part on a promise to simplify processes to speed the delivery of post-disaster assistance. FEMA's 2019 Budget Overview and Congressional Justification includes a commitment to measure the effectiveness of Public Assistance program services, supporting infrastructure, and customer satisfaction following a disaster. It states that "The Public Assistance (PA) Program is integral to improving the clarity of and access to actionable information, streamlining and simplifying processes and policies to ensure that survivors receive disaster assistance quickly and conveniently." Provisions of the memo neither add clarity, improve access to actionable information, streamline or simplify processes and policies, nor make participation in the Public Assistance program more convenient.

FEMA and DRCA serve the same customers, and we believe that the provisions of the memo degrade their ability to recover precisely at the time when their need is greatest. Therefore, we respectfully request steps be taken to negate the detrimental effects on our mutual clients by either sunseting the memo or rescinding it entirely.

We are also requesting a meeting to exchange ideas on this issue, identify potential measures to address your concerns, and provide any additional information or answer any questions you might have relative to the contracting community's perspective. In the interim, thank you for your consideration, and for your ongoing support of our shared mission to accelerate recovery for disaster survivors.

Sincerely,

A handwritten signature in black ink, appearing to read 'CL', is positioned above the typed name and title.

Casey Long
Managing Director
DRCA
675 North Washington Street
Suite 400
Alexandria, VA 22314

Cc: Adrian Sevier, Chief Counsel FEMA