Date: September 28, 2017

To: The Honorable Mitch McConnell Majority Leader U.S. Senate Washington, DC 20510

> The Honorable Chuck Schumer Minority Leader U.S. Senate Washington, DC 20510

The Honorable Paul Ryan Speaker of the House U.S. House of Representatives Washington, DC 20510

The Honorable Nancy Pelosi Minority Leader U.S. House of Representatives Washington, DC 20510

From: Hurricane Housing Recovery Coalition C/O National Low Income Housing Coalition 1000 Vermont Avenue NW, Suite 500, Washington, DC 20005

To Majority Leader McConnell, Minority Leader Schumer, Speaker of the House Ryan, and Minority Leader Pelosi:

We, the undersigned 514 organizations and local governments, write as part of a Hurricane Housing Recovery Coalition to express our commitment to ensuring that federal housing recovery and rebuilding efforts are complete and equitable for all individuals and communities impacted by the devastation caused by Hurricanes Harvey, Irma and Maria. We represent national, state, and local organizations, including many working directly with impacted communities in Texas, Florida, Louisiana, Georgia, Puerto Rico and the Virgin Islands and with first-hand experience recovering after prior disasters. As you work to administer federal disaster relief, we urge you to make certain that federal disaster recovery resources reach all impacted households, including those with the lowest incomes who are often the hardest-hit by disasters and have the fewest resources to recover afterwards.

While the road ahead for recovery after Hurricanes Harvey, Irma and Maria will take many years, there are a number of steps Congress can take now to jumpstart the recovery and assist low income households and communities.

Our recommendations (enclosed) include:

- Providing sufficient housing recovery funds and cost-effective measures to ensure that all households – including homeowners, renters, and those who were experiencing homelessness before the disaster – receive the affordable and accessible housing assistance they need for as long as they need;
- Directing the Federal Emergency Management Agency (FEMA) to quickly enter into a Mission Agreement with the Department of Housing and Urban Development (HUD) so that HUD can stand up a Disaster Housing Assistance Program to administer a disaster voucher program (DVP);
- Playing an active oversight and reporting role to ensure that federal resources are allocated fairly and adequately to meet the needs of low income people and communities;

- Ensuring that the lowest income households can fully benefit from federal disaster housing resources and have meaningful choices over where to live and opportunities for work free from discrimination; and
- Safeguarding federal investments by protecting against future disasters and promoting better coordination among federal agencies.

Thank you for your attention and consideration of these recommendations. Members of the Hurricane Housing Recovery Coalition will follow up soon to discuss these recommendations in more detail.

Sincerely,

National Organizations

National Organizations
American Baptist Home Mission Societies
Autistic Self Advocacy Network
B'nai B'rith International
Catholic Charities USA
Center for American Progress
Center for Community Change
Center for Popular Democracy
Center on Budget and Policy Priorities
Chemung County Housing Coalition
Children's Health Watch
Coalition on Human Needs
Congregation of Our Lady of Charity of the Good Shepherd, US Provinces
Consortium For Citizens With Disabilities Housing Task Force
Consumer Action
Corporation for Supportive Housing
Council For Health & Human Service Ministries, United Church Of Christ
Demand Progress
Elevate Energy
Elliott & Sugarman
Enterprise Community Partners
Equal Rights Center
Evangelical Lutheran Church In America
Evangelical Lutheran Good Samaritan Society
Feeding America
Funders Together To End Homelessness
Grounded Solutions Network
Habitat For Humanity International
Holy Spirit Missionary Sisters, USA-JPIC
HomeFree-USA
Housing Advisory Group
Housing Assistance Council

Housing Partnership Network Housing Up Islamic Society Of North America Lawyers Committee for Civil Rights Under Law LeadingAge Local Initiatives Support Corporation LOCUS: Responsible Real Estate Developers And Investors Low Income Investment Funds Lutheran Services in America Disability Network Make Room Mercy Housing, Inc. Mercy Loan Fund Michigan Historic Preservation Network NAACP NAACP Legal Defense and Educational Fund, Inc. NASTAD National Advocacy, Center of the Sisters of the Good Shepherd National Affordable Housing Management Association National AIDS Housing Coalition National Alliance Of Community Economic Development Associations National Alliance of HUD Tenants National Alliance on Mental Illness National Alliance to End Homelessness National Association For County Community And Economic Development National Association for Latino Community Asset Builders National Association of Affordable Housing Lenders National Association of Local Housing Finance Agencies National Association of Neighborhoods National Association of the Deaf National CAPACD National Center for Healthy Housing National Center For Transgender Equality National Church Residences National Coalition for the Homeless National Community Development Association National Community Reinvestment Coalition National Community Stabilization Trust National Congress for Community Economic Development National Consumer Law Center National Council of Jewish Women National Council On Independent Living National Development Council National Disability Rights Network

National Domestic Violence Hotline National Fair Housing Alliance National Health Care For The Homeless Council National Housing & Rehabilitation Association National Housing Conference National Housing Institute National Housing Law Project National Housing Resource Center National Housing Trust National Housing Trust - Enterprise Preservation Corporation National Law Center on Homelessness & Poverty National Leased Housing Association National LGBTQ Task Force Action Fund National Low Income Housing Coalition National Low Income Housing Policy Center National Network to End Domestic Violence National Urban League Neighborworks Capital **NETWORK Lobby for Catholic Social Justice Oxfam America** Pathstone Corporation Policylink Portlight Inclusive Disaster Strategies Poverty & Race Research Action Council Presbyterian Church (U.S.A.) Office of Public Witness Preservation Of Affordable Housing, Inc. **Prosperity Now** Provincial Council Clerics of St. Viator **Rebuilding Together** Right To The City Alliance **Rural Community Assistance Corporation** Sargent Shriver National Center on Poverty Law Smart Growth America Stewards Of Affordable Housing For The Future **Technical Assistance Collaborative** The Arc of the United States The Jewish Federations Of North America The NHP Foundation The Sharing Community, Inc. Universal Living Wage Volunteers Of America **Xaverian Brothers**

Florida Organizations and Local Governments

Affordable Homeownership Foundation, Inc. Alachua Habitat For Humanity **Beautiful Safe Beginnings Bonita Bestcs** Catalyst Miami Central Florida Community Action Agency Centro De Ayuda Hispana Dba American Help Center City of Pompano Beach, Florida Collier Resource Center, Inc. Community Redevelopment Associates of Florida, Inc. De Hostos Senior Center, Inc. Dr. Arthur Boyer Foundation, Inc. First Community Christian Pentecostal Church of God Florida Alliance for Assistance Services and Technology Florida Alliance of Community Development Corporations, Inc. Florida Asian Services Center Florida Housing Coalition Florida Southwestern State Florida Student Power Network Good Neighbor Society Grace And Truth Community Development Corporation H.O.M.E.S., Inc. Habitat For Humanity of Hardee Habitat For Humanity Of Pinellas City Hallisky & Davis Housing Authority of the City of Fort Myers Housing Opportunities Project for Excellence, Inc. Indian Horizon Of Florida Jacksonville Area Legal Aid, Inc. Jessie Ball Dupont Fund Lakeland Habitat For Humanity Latino Leadership, Inc. Lee County Development Corporation Lee County Homeless Coalition Meals on Wheels South Florida Metro North Community Development Corporation Miami Homes For All NANAY Community Economic Development Corporation New Florida Majority New Horizons Of The Treasure Coast New Smyrna Beach Housing Authority

Organize Florida Pahokee Housing Authority Personal Growth Center Pro Source Real Estate And Property Service **Rebuilding Together Miami-Dade** Religious Of The Sacred Heart Of Mary South Florida Board of Realtists South Florida Community Development Coalition St. Johns Housing St. Petersburg Neighborhood Housing Services, Inc. Tallahassee Housing Authority **Tayan Alliances Inc** The Farmworker Association of Florida, Inc. United Way South Sarasota County Wealth Watchers Inc. Winter Haven Housing Authority Youth and Family Alternatives, Inc.

Texas Organizations and Local Governments

Accessible Housing Austin! Accessible Housing Resources, Inc. Advocacy Outreach Atlantic Housing Foundation, Inc. Austin Community Design & Development Center Austin Habitat for Humanity Austin Housing Coalition Austin Tenants Council Career and Recovery Resources Center For Transforming Lives City of Amarillo, Texas City of Beaumont, Texas City of Galveston, Texas City of Garland, Texas City of McAllen, Texas City of Pasadena, Texas City of Plano, Texas Coalition For The Homeless of Houston/Harris County County of Hidalgo, Texas **Covenant Community Capital Del Rio Housing Authority Dental Health Arlington Greater Houston Fair Housing Center**

Guadalupe Neighborhood Development Corporation House the Homeless Inc. Houston Center For Independent Living Houston Housing Authority I Am Pleased Development Center La Union Del Pueblo Entero Meals On Wheels of Tarrant County Meals on Wheels Texas **Mid-Coast Family Services** NAMI - Abilene **Neighborworks Laredo** North Texas Fair Housing Center Project LIFT Proyecto Azteca **RAISE** Texas **Rebekah Baines Johnson Center** San Antonio Coalition For Veterans And Families **Texas Affiliation of Affordable Housing Providers Texas Appleseed** Texas Association of Community Development Corporations **Texas Homeless Network Texas Housers Texas Tenants' Union** True Casa Consulting LLC Volunteers of America- Texas Waco Community Development Waco Housing Authority

Other State Organizations and Local Governments

Center for Fair Housing Central Alabama Fair Housing Center City of Florence Community Service Programs of West Alabama, Inc. Fair Housing Center of Northern Alabama Alaska Community Development Corporation Sitka Community Land Trust Ability360 Southwest Fair Housing Council Arizona Housing Coalition Association of Programs for Rural Independent Living	Alabama Alabama Alabama Alabama Alaska Alaska Arizona Arizona Arkansas Arkansas
Association of Programs for Rural Independent Living City of Fort Smith	

Housing Authority of Star City Abode Communities Age Well Senior Services, Inc. Asian Pacific Institute on Gender-Based Violence California Homeless Youth Project CarsonWatch Colchester Creek
Disability Rights Education & Defense Fund
EAH Housing Fair Housing Advocates of Northern California Fair Housing Council of Orange County Fair Housing Council of Riverside County, Inc. Fair Housing Council of the San Fernando Valley
Greater Napa Valley Fair Housing Center
Housing Rights Center
Inland Fair Housing and Mediation Board
Oakland Tenants Union
Orange County United Way Project Sentinel
Sacramento Regional Coalition to End Homelessness
US Vets Homeless Feeding & Housing Services
Voces Verdes
Western Center on Law and Poverty
American Planning Association, Colorado Chapter
Colorado Coalition For The Homeless
Community Restoration Partners, LLC
Denver Metro Fair Housing Center
Denver Relief Consulting
Habitat for Humanity of Pueblo
Spector and Associates
Connecticut Fair Housing Center
Connecticut Housing Coalition
Connecticut Legal Rights Project
Housing Development Fund
DC Coalition Against Domestic Violence
North Capitol at Plymouth/Retirement Housing Foundation
Better Homes of Seaford, Inc.
HerStory Ensemble
Housing Opportunities of Northern Delaware, Inc.
Community Outreach Training Center, Inc.
Fuller Center for Housing
Georgia Advancing Communities Together Georgia Coalition Against Domestic Violence
Coorgia Obalition Against Domestic Violence

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JCVision and Associates, Inc. Metro Atlanta Task Force for the Homeless, Inc. Metro Fair Housing Services, Inc. Our Fine Arts, Inc. Poz Military Veterans USA Savannah-Chatham County Fair Housing Council, Inc. Standup For Kids The CHOW Project City of Nampa, Idaho Intermountain Fair Housing Council Living Independence Network Corporation South Central Community Action Partnership Access Living of Metropolitan Chicago Aurora Housing Authority Chicago Area Fair Housing Alliance CK and Associates Hispanic Housing Development Corporation HOPE Fair Housing Center Housing Action Illinois Housing Choice Partners Latin United Community Housing Association Open Communities Park Ridge Housing Initative South Suburban Housing Center The Resurrection Project Valerie S. Kretchmer Associates, Inc. Bridges to Leadership, Inc. Fair Housing Center of Central Indiana God's Helping Hand Habitat for Humanity of Elkhart County Lake County, IN Department of Community Economic Development Unified Government of Wyandotte County/Kansas City First World Architects Studio Stephanie Sweeney & Associates, LLC Blueprints Consulting EXP Realty LLC GL Realty Group LLC Greater New Orleans Fair Housing Action Center Greater New Orleans Housing Alliance	Georgia Georgia Georgia Georgia Georgia Georgia Hawaii Idaho Idaho Idaho Idaho Idaho Illinois
GL Realty Group LLC Greater New Orleans Fair Housing Action Center Greater New Orleans Housing Alliance Lower 9th Ward Homeownership Association Mental Health America of Louisiana	Louisiana
Providence Community Housing	Louisiana

Re/Max First Avesta Housing Coastal Enterprises, Inc. Freeport Housing Trust Maine Affordable Housing Coalition Advocacy and Training Center African American Health Alliance Alabaster Asian-American Homeownership Counseling, Inc. Baltimore Neighborhoods, Inc. Coalition Homes, Inc. Du & Associates, Inc. Maryland Affordable Housing Coalition Montgomery Housing Partnership Partnership for Inclusive Disaster Strategies Racial and Ethnic Health Disparities Coalition Swift, Thomas & Kemp Development Group, Inc. The Cave Institute Birch Island Real Estate Consulting LLC CohnReznick Corcoran Jennison Management LLC Homes for Families Massachusetts Fair Housing Center Massachusetts YouthBuild Coalition Montgomery County Coalition for the Homeless Natural Hazard Mitigation Association RoundStone Group The North Shore Moving Market Uniting Citizens for Affordable Housing in Newton **Financial Justice Coalition** Habitat for Humanity Northeast Michigan Michigan Community Reinvestment Coalition Michigan State University - College of Law - Housing Law Clinic Casa de Esperanza: National Latin@ Network for Healthy Families and Communities Integrated Community Solutions, Inc. Metropolitan Fair Housing Council of Oklahoma, Inc. Metropolitan Interfaith Council on Affordable Housing Minnesota Housing Partnership Our Spring Lake Store LLC Better Family Life, Inc. **Empower Missouri**

Maine Maine Maine Maine Maryland Massachusetts Michigan Michigan Michigan Michigan Minnesota Minnesota Minnesota Minnesota Minnesota Minnesota Missouri Missouri

Louisiana

Habitat for Humanity of Tompkins & Cortland Counties New York	ADAPT Montana Friend Housing Authority Sisters of Mercy West Midwest Justice Team ACTIONN Advocates for Peace and Social Justice Consumer Credit and Budget Counseling, Inc. Fair Share Housing Center of New Jersey Housing Community Development Network of New Jersey Housing Community Development Network of New Jersey Jersey City Office of Community Development Monarch Housing Associates New Jersey Association on Correction New Jersey Tenants Organization New Mexico Coalition To End Homelessness Ali Forney Center Alliance Against Homeless of Bergen County, Inc. Alternatives Federal Credit Union Arbor Housing And Development ARC Foundation, Inc. Carroll Gardens Association Center For New York City Neighborhoods Central Oklahoma Commercial Association of REALTORS Central Oklahoma Commercial Association CLUSTER Community Development Corporation CLUSTER Community Development Futures, LLC Community Solutions Continuum of Care, Mount Vernon New York Coordinated Care Services, Inc. Disabled in Action of Greater Syracuse Inc. Empire Justice Center Fair Housing Curporation Geel Community Services, Inc. Flatbush Development Corporation Geel Community Services, Inc. Flatbush Development Corporation Geel Community Services, Inc. Flatbush Development Corporation Geel Community Services, Inc. Good Shepherd Services Habitat for Humanity New York City	Missouri Montana Nebraska Nevada New Jerse New Jerse New Jerse New Jerse New Jerse New Jerse New Jerse New Jerse New Jerse New York New York
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Jersey Jersey Jersey Jersey Jersey Jersey Jersey Jersey Mexico York York

Hellenic American Neighborhood Action Committee Housing Help, Inc. Hudson River Housing, Inc. Human Development Services of Westchester	New York New York New York New York
Independent Living Center of the Hudson Vallie, Inc.	New York
Lantern Community Services	New York
Local Initiatives Support Corporation- New York City	New York
Long Island Housing Services, Inc.	New York
Make the Road New York	New York
Mohawk Valley Housing and Homeless Coalition	New York
Morningside Heights Multi-Cultural Tenants Organization	New York
NAACP Mid-Manhattan Branch	New York
Neighborhood Housing Services of Jamaica, Inc.	New York
Neighborhood Preservation Coalition of New York State, Inc.	New York
New York Association on Independent Living	New York
New York Housing Conference	New York
New York State Homes and Community Renewal	New York
New York State Rural Advocates, Inc.	New York
New York State Tenants & Neighbors Coalition	New York
Newburgh Housing Authority	New York
Northeast Hawley Development Association, Inc.	New York
Program Design and Development LLC	New York
Project Hospitality	New York
Public Housing Communities, Inc.	New York
Rensselaer County Housing Resources	New York
Rensselaer Housing Authority	New York
Resource Center for Independent Living, Inc.	New York
RUPCO	New York
Rural Housing Opportunities Corporation	New York
Rutgers Resident Council	New York
South Country Community Land Trust	New York
Southern Tier Independence Center	New York
Southside United HDFC	New York
Southside United Housing Development Corporation	New York
Supportive Housing Network Of New York	New York
The Guidance Center of Westchester	New York
The Housing Council at PathStone, Inc.	New York
Troy Rehabilitation and Improvement Program	New York
Westgate Tenants Association @ Stonehenge Village	New York
YWCA of Rochester and Monroe County	New York
YWCA of Syracuse and Onondaga County, Inc.	New York
YWCA of the Greater Capital Region	New York
Financial Pathways of the Piedmont	North Carolina

Housing Authority of the City of High Point North Carolina Housing Coalition Wilson Area Habitat for Humanity Minot Area Home Coalition Affordable Housing Alliance of Central Ohio Barbara Poppe and Associates Central Ohio Fair Housing Association **Cleveland Tenants Organization** Fair Housing Advocates Association Fair Housing Center of Toledo Fair Housing Resource Center, Inc. Housing Research & Advocacy Center Miami Valley Fair Housing Center, Inc. The Partnership Center YMCA of Columbus **Baker Schonchin Holdings Corporation** Northwest Consumer Affairs **ROSE Community Development Catholic Social Services** Housing Equality Center of Pennsylvania Integra Home Counseling, Inc. National Resource Center on Domestic Violence Nazareth Housing Services Pennsylvania Association of Housing & Redevelopment Agencies Scranton Counseling Center Uptown Partners of Pittsburgh HousingWorks RI County of Lexington SC Department of Community **Development Development Steps Erwin Housing Authority GAP Community Development Resources** New Level Community Development Corporation Shield, Inc. Housing Channel **Crossroads Urban Center** Salt Lake City County Continuum of Care Salt Lake Homeless Coordinating Council **Utah Housing Coalition** Housing Vermont Randolph Area Community Development Corporation RuralEdge

North Carolina North Carolina North Carolina North Dakota Ohio Oregon Oregon Oregon Pennsylvania Pennsylvania Pennsylvania Pennsylvania Pennsylvania Pennsylvania Pennsylvania Pennsylvania Rhode Island South Carolina South Carolina Tennessee Tennessee Tennessee Tennessee Texas Utah Utah Utah Utah Vermont Vermont Vermont

Vermont Affordable Housing Coalition Community Housing Partners Farmville Area Habitat for Humanity, Inc. Habitat for Humanity Virginia
Housing Opportunities Made Equal of Virginia
Piedmont Housing Alliance
Virginia Housing Alliance
Catholic Charities Housing Services
Fair Housing Center of Washington
Gethsemane Lutheran Church
Greenfield Institute
Homeward Bound Community Land Trust
OPAL Community Land Trust
Seattle/King County Coalition on Homelessness
Washington Low Income Housing Alliance
Whatcom Skagit Housing
Central Appalachia Empowerment Zone of West Virginia
Mountain Hospice, Inc.
Affordable Housing Action Alliance
Commonwealth Development Corporation
Hirsch Group Architecture
IndependenceFirst
Wisconsin Coalition of Independent Living Centers
Wisconsin Partnership for Housing Development
Wyoming Coalition for the Homeless

Vermont Virginia Virginia Virginia Virginia Virginia Virginia Washington Washington Washington Washington Washington Washington Washington Washington Washington West Virginia West Virginia Wisconsin Wisconsin Wisconsin Wisconsin Wisconsin Wisconsin Wyoming

Congressional Housing Recovery Policy Recommendations

Congress should:

- 1. Provide sufficient housing recovery funds and enact cost-effective measures to ensure that all households, including homeowners, renters, and those who were experiencing homelessness before the disaster, receive the affordable and accessible housing assistance they need for as long as they need it:
 - a. Housing recovery resources should include funding for:
 - i. Community Development Block Grant Disaster Recovery (CDBG-DR) grants that maintain current income targets and affordability restrictions;
 - ii. Disaster Housing Assistance Program (DHAP) to assist the lowest income renters with their medium- to longer-term housing needs;
 - iii. National Housing Trust Fund development resources to ensure that rental homes rebuilt or rehabilitated with federal CDBG-DR and Low Income Housing Tax Credit investments can reach the lowest income households;
 - Operating assistance to ensure that rental housing is affordable to the lowest income households. Operating assistance should be provided through the national Housing Trust Fund and the ability to project-base Housing Choice vouchers (PBV) or disaster vouchers (DVP);
 - v. McKinney-Vento Homeless Assistance Grants;
 - vi. Public Housing Capital Funds to repair damaged or destroyed public housing units;
 - vii. Emergency repair grants to repair damaged or destroyed units financed under Section 202 or 811;
 - viii. HOME Investment Partnerships Program (HOME) funds;
 - ix. Community Development Financial Institutions (CDFI) Program Financial Assistance (FA), with a preference for CDFIs that have a track record working in the impacted communities;
 - x. Administrative funding for state and local governments managing and implementing CDBG-DR funds;
 - xi. USDA housing and rural development programs, consistent with disaster relief provided in 2009 after Hurricanes Rita and Katrina, with direction to improve efficiency;
 - xii. Communications to ensure that all survivors, regardless of language and disability status, understand the federal recovery tools available to them; and
 - xiii. Salaries and expenses to allow HUD staff to develop disaster recovery processes and strategies in advance of future events.

- b. Cost-saving measures should include requiring that CDBG-DR recovery grants be used to address the needs of low and moderate-income households first, when federal resources are not sufficient to cover all impacted households.
- 2. Enact robust tax relief that includes:
 - a. A special allocation of 9% and 4% Low Income Housing Tax Credits and bond authority to impacted communities with strong incentives for deeply targeted units:
 - i. These incentives should include reforms from Senator Hatch's (R-UT) and Senator Cantwell's (D-WA) *Housing Credit Improvement Act* including:
 - 1. The option to use income-averaging for compliance;
 - A 50% basis boost for housing developments that serve extremely low income households and individuals experiencing homelessness;
 - 3. A prohibition of local approval and contribution requirements;
 - 4. Incentives to develop affordable rental housing for Native Americans;
 - 5. A minimum 4% Housing Credit rate for acquisitions and Housing Bond-financed developments; and
 - 6. The ability for states to award a 30% basis boost for Housing Bond-financed developments.
 - ii. Congress should consider providing states with the ability to provide a basis boost for developments located in disaster-impacted areas.
 - iii. Congress should ensure that the disaster recovery legislation follows existing law, which requires states to give preference to "projects serving the lowest income tenants" and "projects obligated to serve tenants for the longest period"; and
 - iv. Congress should provide flexible deadlines given the likely challenges developers will face in accessing needed financing and securing labor and materials after a disaster. Instead of a 'placed in service' deadline, Congress should consider a deadline by when construction must begin.
 - b. Authorization for low income households to deduct from their taxable income a portion of the cost to reconstruct their home, not covered by insurance or federal loans or grants and capped at a reasonable amount;
 - c. A special allocation of New Markets Tax Credits and an increase in the program's limitation amount to allow distressed communities to rebuild critical infrastructure, including community facilities like health centers and schools;

- Authorization of an additional advance refunding of a tax-exempt bond that is outstanding on the date on which a federally-declared disaster occurs;
- e. Issuance of qualified disaster area recovery bonds; and
- f. Increased rehabilitation tax credits.
- 3. Play an active oversight and reporting role to ensure that federal resources, including investments in housing, public infrastructure, and environmental remediation, are allocated fairly and adequately to meet the needs of low income people and communities in urban, suburban, and rural communities, including:
 - a. Directing FEMA to collect comprehensive demographic data on the impact of the disaster and federal recovery efforts, to survey impacted areas on disaster and social neighborhood vulnerability, and to use the results when allocating resources. Data should be collected on all protected classes covered by the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights protections, including, but not limited to race/ethnicity, income and economic status, age, disability, and gender, as well as education, vulnerability for gentrification and future displacement, transportation dependence, housing tenure of the individual and location at a granular basis to enable meaningful analysis.
 - b. Requiring states to demonstrate to HUD that they are adequately addressing the needs of homeowners, renters, and people experiencing homelessness with their CDBG-DR allocation and other resources as a condition for receiving funds. This should be made available to the public.
 - c. Requiring states to submit to HUD for its approval performance goals for the recovery of homeownership and rental housing programs, including goals for processing applications, beginning construction, and completion. Performance goals should be made available to the public.
 - d. Requiring states to track and report to HUD and make publicly available the completion status of all homeowner and rental units that receive federal recovery assistance;
 - e. Directing HUD's Office of Inspector General (OIG) to oversee and collect data disaggregated by race and geography on all disaster recovery efforts and report to Congress. Data should include all protected classes covered by the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights protections. This data should be made available to the public;

- f. Requiring HUD to publish in the Federal Register at least five days prior to implementation any waivers of federal regulations; and
- g. Holding oversight hearings and requiring federal agencies, including FEMA and HUD, to report to Congress on specific criteria on a regular basis.
- Ensure that the lowest income households can fully benefit from federal disaster housing resources and have meaningful choices over where to live and opportunities for work, by:
 - a. Ensuring that households receive affordable and accessible housing assistance for as long as they need it and are not subject to arbitrary deadlines prior to full recovery;
 - Funding legal aid services to provide survivors with short-term and longterm help accessing disaster recovery programs and overcoming legal obstacles to recovery, such as title issues, legal representation in mortgage foreclosures;
 - c. Funding social services, transportation, and education to address the full scope of needs for displaced individuals and individuals experiencing homelessness, including resources to help homeless students attend school;
 - d. Enacting legislation to protect individuals from rent hikes and price gouging during disaster recovery;
 - e. Funding housing counseling, including mobility counseling services, to help low income households identify all housing opportunities, including the option to relocate to the neighborhood of their choice, and to understand the risk and cost of future disasters;
 - f. Requiring all property owners receiving federal disaster assistance, including CDBG-DR funds, to prioritize tenants receiving housing assistance for available units;
 - g. Requiring that HUD ensure that all damaged federally subsidized rental housing be replaced on a one-for-one basis, with a right to return to rehabilitated or newly constructed replacement housing;
 - Basing grant amounts on the cost to replace or repair damaged property rather than property values to help close financing gaps and to protect households that live in neighborhoods where property values are less than the cost of repairs and replacement;

- i. Repairing or rebuilding federally subsidized rental housing in a manner that is consistent with HUD's Affirmatively Furthering Fair Housing guidance to ensure fair housing choice. Investments should be made in a manner that fosters affordable housing in high-opportunity neighborhoods and in communities with currently existing affordable housing. All investment should be made in a manner that prevents displacement and provides impacted residents with the choice to stay in their existing communities or relocated to other desired locations;
- j. Providing longer forbearance periods and fair repayment terms on federally financed and federally insured home mortgages and rental housing loans, including those at the Federal Housing Administration, the U.S. Department of Agriculture, the U.S. Department of Veterans Affairs, and the Federal Housing Finance Agency, to accommodate the time to rebuild;
- Funding the Corporation for National and Community Service AmeriCorps program and Youth Build program to train unemployed and underemployed young adults to assist with the rapid repair and rebuilding efforts;
- Funding public housing agencies and local governments to hire HUD Section 3 coordinators in order to facilitate training, employment, and small business contracting opportunities for eligible residents and businesses in the recovery effort. This can be effectively accomplished by working with local stakeholder groups, including, but not limited to, local Chambers of Commerce, small business affinity groups, and local community development corporations and other community-based organizations operating in impacted communities; and
- m. Providing oversight/accountability for utilization of Section 3 by HUD grantees, including public housing agencies and local jurisdictions, as required by law.
- 5. Protect displaced individuals from discrimination by:
 - a. Enacting legislation barring all landlords who receive disaster recovery assistance from discriminating against displaced individuals based on housing status, eviction history, and source of income, including rental housing assistance;
 - b. Funding qualified fair housing enforcement organizations to help people in disaster-affected areas understand their fair housing rights and how to enforce them, investigate and resolve fair housing complaints, monitor conditions in the housing market to proactively identify and stop discriminatory home sale and rental practices, and undertake other efforts,

as needed, to ensure that those affected by the disasters do not face unfair, discriminatory housing practices as they recover from the disaster;

- c. Providing funding to the Department of Justice to enforce federal fair housing laws, as well as Title VI and Title VII laws, after disasters;
- d. Enacting legislation barring any community that accepts federal disaster relief and recovery funds from passing or enforcing laws which criminalize people experiencing homelessness for self-sheltering or conducting other life-sustaining behaviors in public places when there are inadequate alternatives; and
- e. Enacting legislation to ensure that individuals experiencing homelessness prior to the disaster have access to the same disaster relief assistance as those who were renting their homes prior to the disaster.
- 6. Protect against future disasters by:
 - Providing robust funding for FEMA's mitigation programs and directing FEMA to assist communities in financing mitigation efforts or accessing private financing. FEMA should prioritize communities at greatest risk, with the largest potential savings, and with the least ability to finance mitigation themselves;
 - b. Directing FEMA to update floodplain maps using the highest quality datasets, like Light Detection and Ranging (LIDAR) data, and with public input to ensure accuracy. Congress should require FEMA to make these maps available to the public;
 - c. Requiring that all infrastructure financed with federal resources meet minimum standards storm water protection, such as those required by Federal Flood Risk Management Standards;
 - d. Requiring that the reconstruction of any home built with federal resources located in 100-year flood hazard area includes cost-effective mitigation strategies, including the elevation of residential structures and parking areas above the 100-year floodplain or higher, floodproofing lower levels of residential structures, and other methods;
 - e. Funding the full remediation of Environmental Protection Agencydesignated Superfund sites; and
 - f. Allowing disaster relief funds, such as CDBG-DR, to be used for storm mitigation strategies. For example, these resources could be used for roof hardening, the purchase of shutters, or the installation of hurricane-resistant windows and doors and resilient power systems, including solar

+ storage microgrid technology that can provide backup power during extended outages.

- 7. Promote better coordination among federal agencies by:
 - a. Making the CDBG-DR program permanent and directing HUD to create a standard set of CDBG-DR regulations;
 - Enacting laws and policies to ensure better federal coordination of disaster recovery, using FEMA's National Incident Management System as a model; and
 - c. Establishing a central federal database to consolidate relevant data collected by all local, state and federal agencies involved in disaster response. Data should be available throughout the response/recovery period to federal, state and local governments directly responsible for administering disaster recovery funds.

For More Information, contact Diane Yentel, NLIHC President and CEO (<u>dyentel@nlihc.org</u>) or Sarah Mickelson, NLIHC Public Policy Director (smickelson@nlihc.org).