NATIONAL LOW INCOME HOUSING COALITION

May 6, 2019

The Honorable Pete Gaynor, Administrator
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

Administrator Gaynor,

On behalf of the Disaster Housing Recovery Coalition (DHRC), I write to express the urgent need for greater assistance from the Federal Emergency Management Agency (FEMA) in communities across the nation as a result of the coronavirus pandemic. While we applaud the actions taken by FEMA to utilize its Public Assistance (PA) program to assist a portion of the nation's homeless population in accessing non-congregate sheltering, this unprecedented public health crisis demands even greater FEMA support and assistance. Given the severity of the pandemic and its impact on millions of households, FEMA must adapt its current programs and bring to bear its full suite of assistance tools to better address the immediate health and housing needs of people experiencing homelessness and America's lowest-income and most marginalized individuals.

The DHRC is led by the National Low Income Housing Coalition and includes over 850 national, state, and local organizations, including many organizations working directly with disaster-impacted communities and with first-hand experience recovering after disasters. We work to ensure that federal disaster recovery efforts reach all impacted households, including the lowest-income and most marginalized individuals who are often the hardest-hit by disasters and have the fewest resources to recover afterwards, including people of color, people with disabilities, and other individuals.

Needed Reforms to the FEMA Public Assistance Program

As more state governments prematurely rescind stay-at-home orders, FEMA must modify its current response to ensure the continued health and safety of those individuals with the greatest needs. To date, FEMA has required that reimbursement approval for PA non-congregate sheltering depend on public health directives issued by state governments, in combination with direct requests by governors and emergency management agencies. Some states governments, including those with approved non-congregate reimbursement agreements such as North Carolina, are planning to open up their states and rescind emergency directives. These decisions are being made against the advice of doctors,.

epidemiologists, and many emergency managers. The risk to public health posed by congregate sheltering during a pandemic remains immediate and severe – regardless of whether a state has rescinded public health orders or not. To help prevent and respond to outbreaks among people experiencing homelessness and other people living in congregate settings, including people with disabilities, FEMA should modify the PA program so that critical non-congregate sheltering can continue even if a public health directive is rescinded or not provided by state officials.

The health and safety of people experiencing homelessness and other marginalized populations also depends on greater transparency by FEMA. Lack of easily accessible information on FEMA reimbursement agreements with states are a serious barrier. Housing and homeless shelter or service providers who are working directly with impacted populations often lack the critical information needed to plan and interface with the PA program – such as expiration dates and application processes. FEMA should ensure that all documentation surrounding the request, approval, and justification of non-congregate sheltering reimbursement is made publicly available online. This would improve transparency and the ability of housing and homeless service providers to utilize the PA program to the most effective extent possible.

Activation of FEMA Disaster Assistance Tools

We also urge FEMA to make available its full suite of assistance tools during this crisis. As authorized by the Stafford Act, FEMA can administer a wider suite of disaster assistance programs designed to be deployed rapidly to the wide range of challenges faced by individuals during and after a disaster, including housing instability, financial stress, and the need for legal services. To help address the broad health, housing, and economic impacts of the coronavirus pandemic, FEMA should immediately activate its Individual Assistance (IA) programs, including the Transitional Shelter Assistance (TSA), Individual and Households (IHP) assistance, and Disaster Legal Services (DLS) program, to ensure that low-income households can remain stably housed and recover fully and equitably. Although not originally created for pandemic response, these programs could be quickly deployed to serve households in need as a result of the coronavirus pandemic, rather than requiring overburdened state and local governments to quickly design and stand up new programs.

Your decision to apply an unnecessarily narrow scope to FEMA's role in responding to this public health crisis is deeply unfortunate and should be immediately reversed, given the magnitude and scale of its impact on low-income and other marginalized people. By activating these programs now to address housing, financial, and legal needs, FEMA can help ensure that low-income households are not pushed even deeper into poverty and homelessness as a result of the pandemic.

Taking these actions will not only address the immediate health, housing, and economic needs stemming from the pandemic, but it will help our nation better prepare for what may be a particularly devastating hurricane season. Households that are financially stable are better prepared for potential disasters because financial preparedness is disaster preparedness. Instead of being forced to address the compounded suffering of individuals already struggling with housing, financial, and legal issues in the aftermath of the hurricane, FEMA should take steps now to ensure that all households impacted by coronavirus are adequately prepared to face a hurricane or other disaster during this strenuous time.

I look forward to your response to these urgent matters.

Sincerely,



Diane Yentel
President and CEO