

# PLUGGING THE GAPS

RECOMMENDATIONS FOR HUD'S RUSH PROGRAM

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# I. INTRODUCTION

America’s disaster housing recovery system is broken and in need of major reform. When disasters strike, the lowest-income survivors – including people of color, seniors, people with disabilities, people experiencing homelessness, and people with limited English proficiency – are often the hardest hit and are left with the longest, steepest paths to recovery.

Despite the clear need, initial recovery efforts undertaken by the Federal Emergency Management Agency (FEMA) [frequently leave these survivors without the assistance necessary to recover fully](#) and render communities less resilient to future disasters. As a result, federally led emergency response and recovery programs often exacerbate and reinforce racial, income, and accessibility inequities at every stage.

To address the unmet needs of these communities, the U.S. Department of Housing and Urban Development (HUD) [launched](#) the Rapid Unsheltered Survivor Housing (RUSH) program. Deployed through HUD’s Emergency Solutions Grant (ESG) program, RUSH aims to “help communities provide outreach, emergency shelter, rapid re-housing, and other assistance to people experiencing or at risk of homelessness who are in a disaster-affected area but who cannot access all services provided by FEMA programs.”<sup>1</sup> The creation of RUSH comes after years of advocacy by the National Low Income Housing Coalition’s (NLIHC) Disaster Housing Recovery Coalition (DHRC), which includes the National Housing Law Project and over 900 other local, state, and national advocacy organizations.<sup>2</sup>

While the RUSH program has the potential to help meet the disaster housing needs of people with the lowest incomes, program implementation has been slow, and the benefits for impacted people remain to be seen. RUSH funding was first deployed in the fall of 2022 to support the response to Hurricane Ian, which decimated the southwest coast of Florida. However, over one year later, funding has only just begun to reach impacted communities, and many of those individuals with the fewest resources who were most impacted by the hurricane continue to experience severe housing instability and homelessness.

HUD created the RUSH program in recognition of the need to target rapid disaster recovery assistance to those who are too often rendered ineligible for, or who are unable to access, FEMA assistance. With improved implementation, RUSH can – and should - play a vital role in addressing the gaps in disaster response and recovery.

This report examines the initial implementation of RUSH and makes suggestions about how to better deploy RUSH assistance to those with the greatest needs in the future. Section II surveys the barriers preventing low-income and unhoused individuals from accessing FEMA disaster assistance, while Section III provides an overview of the RUSH program. Section IV explores the initial implementation of RUSH in Florida and identifies the problems that slowed program implementation in the state. The report’s final section recommends actions that should be undertaken by HUD to improve RUSH implementation. Specifically, the report recommends that HUD should:

1. Ensure that decisions to allocate disaster assistance do not reinforce pre-existing racial disparities. HUD should explore alternative ways to ensure equity when deploying RUSH funds.
2. Provide RUSH funds up front instead of via a reimbursement model to allow for quick implementation of activities.

With improved implementation, RUSH can – and should - play a vital role in addressing the gaps in disaster response and recovery.

3. Impose timing requirements that complement FEMA programs.
4. Clarify the benefits of synchronizing RUSH and ESG activities and ensure that regulatory waivers provided to RUSH recipients are sufficient to allow modification of existing ESG plans.
5. Prioritize the creation of detailed guidance regarding the possible uses of RUSH funds, the process for accessing funds, and how comprehensive plans can be amended to account for funds.
6. Directly distribute material to all jurisdictions receiving ESG to ensure they have access to these materials in advance.
7. Modify the requirements for comprehensive plans to better facilitate the receipt and deployment of emergency disaster recovery-related RUSH funds.
8. Ensure that Continuums of Care (CoCs) in disaster-affected areas receive detailed guidance regarding how RUSH funds can be utilized to bolster CoC activities in the context of disaster recovery.
9. Publicize disaster resources to CoCs and ensure that their role is clearly delineated during the response and recovery following disasters.
10. Ensure that staff from field offices and other HUD personnel are on the ground in areas allocated RUSH funding to help bolster area capacities following disasters.
11. Consider increasing the existing cap on the use of funds for administrative capacity in RUSH programs to allow for improved system response.
12. Provide detailed information regarding where disaster survivors can access funds as part of funding allocations.
13. Produce a detailed fact sheet on RUSH, and work with impacted counties to provide information regarding the program, the specific activities being funded, the partners using funds, and other important program information.
14. Work with jurisdictions receiving HUD funding to ensure that adequate notice of public comment is provided to disaster-impacted individuals.

## II. BARRIERS PREVENTING ACCESS TO FEDERAL DISASTER ASSISTANCE PROGRAMS

The RUSH program's importance derives from the relative inaccessibility of federal disaster assistance programs for households with low incomes and those experiencing homelessness. Existing FEMA programs pose challenges for low-income applicants when it comes to navigating application processes and utilizing any assistance that is eventually received.<sup>3</sup> FEMA and HUD worked together to launch a disaster assistance initiative – the Disaster Housing Assistance Program (DHAP) – that would better target low-income households and those experiencing homelessness, but FEMA has consistently refused to activate DHAP in recent years. Without viable alternative programs, disaster survivors with the greatest needs are often left to fend for themselves, and many are pushed into homelessness as a result.

### *Inequity and Lack of Access in FEMA's Disaster Recovery Programs*

Low-income households face significant hurdles following a disaster, especially when it comes to accessing FEMA housing assistance. Housed individuals and families who are *prima facie* eligible for disaster assistance are often subsequently deemed ineligible because of inflexible and arbitrary requirements and confusing bureaucratic processes, despite having a clear need. To secure assistance, disaster survivors are frequently required to submit multiple applications to different federal agencies, along with multiple proofs of personal identification, ownership and residency, citizenship, insurance reporting, and more. Meanwhile, applications are not always provided in languages or formats accessible to all members of impacted communities. As a

result, FEMA denial rates are exceedingly high. Given that households unable to access FEMA assistance have very few alternatives, many face housing instability, displacement, and even homelessness in the wake of disasters.<sup>4</sup>

Even successful applicants can face housing instability following a disaster because FEMA assistance is time-limited to 18 months by the “Stafford Disaster Relief and Emergency Assistance Act” (Stafford Act).<sup>5</sup> Though FEMA can extend the deadline in certain circumstances, financial pressures usually result in program termination at the 18-month deadline. Moreover, the 18-month period begins at the time of the disaster, not when assistance is first received: an individual forced to appeal an arbitrary denial by FEMA who ultimately begins to receive assistance one year after a disaster would only be eligible for six months of remaining assistance under the rule, for example. Those who lose their assistance after 18 months may hope for further support from long-term recovery programs, like HUD’s Community Development Block Grant-Disaster Recovery (CDBG-DR) program. However, because such programs require time to implement, such alternative forms of assistance are rarely available to assist disaster survivors after the expiration of FEMA assistance.<sup>6</sup> As a result, even low-income disaster survivors who received short-term FEMA assistance are often forced back into the precarious housing position they occupied immediately following the disaster: housing insecure and facing homelessness.

Non-citizens are confronted with special problems accessing housing assistance following a disaster. In general, all survivors affected by a major disaster, regardless of immigration status, are eligible to receive non-monetary, in-kind, emergency disaster relief assistance from FEMA, such as medical care, shelter, food, and water. However, certain types of FEMA assistance, including Housing Assistance, are restricted to U.S. citizens and eligible non-citizens. Adding to the concerns of non-citizen survivors applying for FEMA benefits is the fact that FEMA is located within the U.S. Department of Homeland Security (DHS), which oversees immigration enforcement, including efforts to find and deport undocumented residents of the U.S. While FEMA does not proactively provide applicant information to immigration officials or law enforcement agencies, it may share applicant information upon receiving a specific request from DHS if a person poses a current threat to national security or public safety. However, DHS has clarified that locations providing disaster or emergency relief, registration for disaster-related assistance, or disaster-related social services are “protected areas” where enforcement actions are generally [avoided](#).<sup>7</sup>

The situation is particularly grave for individuals and families who were homeless prior to a disaster. As FEMA explains in its [Individual Assistance Program and Policy Guide](#), the agency “does not provide Housing Assistance (Rental Assistance, direct assistance, Home Repair Assistance, or Home Replacement Assistance) to applicants experiencing homelessness because the need for housing was not caused by the disaster.” Uniquely among federal agencies, FEMA does categorize individuals residing in tents, huts, or lean-to structures as “residents of non-traditional housing” as opposed to “homeless,” meaning those living in such structures can receive initial rental assistance and lodging expense reimbursement. However, the format of the assistance – which is made available by reimbursement only – and the verification requirements needed to specify that an individual resided in a non-traditional structure within the disaster-impacted area at the time of the disaster mean that an individual experiencing homelessness can only very rarely utilize this type of assistance.<sup>8</sup>

Barriers to FEMA assistance like these create a dire situation for those who were unhoused prior to a disaster or who are newly housing insecure following a disaster – disproportionately, members of the Black, Hispanic, Indigenous, and Asian American and Pacific Islander communities.<sup>9</sup> To make matters worse, existing resources for individuals and families experiencing homelessness are usually stretched thin after a disaster to accommodate the newly housing insecure.<sup>10</sup> Due to the influx of new households in need, communities are often unable to quickly resume the level of care provided to people who were experiencing or at risk of homelessness before a disaster. As a result, communities must devote more resources than ever to assisting

newly homeless populations, and those experiencing or at risk of homelessness must wait longer for desperately needed services.<sup>11</sup>

### *The Disaster Housing Assistance Program and Transitional Shelter Assistance*

The Disaster Housing Assistance Program (DHAP), created through a partnership between HUD and FEMA, helped overcome many of these barriers. Developed in response to the hard-won lessons of Hurricane Katrina and used to great effect by both Democratic and Republican administrations, DHAP provided longer-term housing assistance and wrap-around services to low-income survivors immediately after a disaster. Program services were provided by local housing professionals with extensive knowledge of local housing markets who were able to ensure that assistance was used to help families find permanent housing solutions, secure employment, and connect to public benefits.<sup>12</sup>

Yet despite the program's successes, FEMA has consistently chosen not to activate DHAP during recent disasters. Instead, the agency tends to rely on its Transitional Shelter Assistance (TSA) motel-stay program and other FEMA- and state-administered disaster housing programs that are inaccessible to many low-income disaster survivors.<sup>13</sup> Like similar programs, TSA reimburses disaster survivors for their hotel stays but requires survivors to cover the up-front costs. However, low-income families are often unable to access TSA motels due to financial and other barriers, including the practice of motels charging daily "resort" fees and requiring security deposits or payment via credit card. At the same time, hotels in disaster-impacted regions often do not have the capacity to provide rooms for every TSA-accepted disaster survivor, forcing some households to travel hundreds of miles to utilize the program. Worse yet, because a family's eligibility to continue receiving assistance under TSA must be renewed every 14 days, even survivors who can access the program face frequent and arbitrary renewal deadlines that force them either to scramble to submit required paperwork or leave a motel before finding a permanent housing solution. Without access to affordable and accessible housing, many have no choice but to return to uninhabitable homes, sleep in cars or tents, stay at shelters, double- or triple-up with other low-income families, or pay more than half of their limited incomes on rent, putting them at increased risk of eviction and homelessness.<sup>14</sup>

FEMA claims – without evidence – that motel-stay programs like TSA are more efficient and cost-effective than DHAP. But a [report](#) released by the Government Accountability Office has determined that it is impossible to assess such claims because the information needed to compare DHAP's effectiveness with other FEMA programs has not been collected by FEMA. At the same time, the report finds that DHAP has provided disaster survivors with as much as 17% more monetary assistance than other FEMA programs.<sup>15</sup> Even so, and against all available evidence, FEMA has refused to re-activate DHAP.

## III. THE RUSH PROGRAM

Rather than waiting on the sidelines, HUD decided to utilize its own existing resources to address the gaps in assistance affecting the most impacted and distressed households following disasters. In response to years of advocacy by members of NLIHC's DHRC, HUD announced in the fall of 2022 the creation of the Rapid Unsheltered Survivor Housing (RUSH) program to help the lowest-income and most marginalized disaster survivors regain or maintain stable, affordable housing.<sup>16</sup> The program was established on the basis of new reallocation authorities provided to HUD in the fiscal year (FY) 2020 appropriations bill. These authorities allowed HUD to set aside \$56 million for the creation of RUSH.

RUSH funds are meant to help communities provide outreach, emergency shelter, rapid re-housing, and other assistance to people experiencing or at risk of homelessness in disaster-affected areas but who are unable to access services provided by FEMA.<sup>17</sup> Indeed, HUD states explicitly that the purpose of the program is to fill the gap in federal disaster assistance created by the narrow eligibility criteria limiting access

to FEMA's TSA program and to address the loss of support that results when FEMA terminates assistance for disaster-affected people 18 months after a disaster. The program also aims to lessen the impact of post-disaster increases in rents, which often exacerbate homelessness in areas impacted by disasters.<sup>18</sup>

RUSH funds are deployed within the framework of HUD's Emergency Solutions Grant (ESG) program, created in its current form via an amendment to the "McKinney-Vento Homeless Assistance Act" enacted through the "Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009." The ESG program helps households regain stability after experiencing a housing crisis or homelessness by providing quick access to permanent housing.<sup>19</sup> ESG funds are granted to states, counties, and municipalities and then subgranted to private nonprofit organizations providing homeless services under consultation with an area's Continuum of Care (CoC). To receive ESG funds, a state or other jurisdiction must apply directly to HUD via the agency's Consolidated Planning process, which creates a set of three-to-five-year strategies to address housing needs and homelessness, incorporating advice from applicable CoCs and the general public. The funds must be matched by state or municipal governments through the provision of equal amounts of funding, donated buildings or materials, or volunteer services. (Territories are exempt from this matching requirement.) Funds are provided via a reimbursement model, wherein program operators perform ESG-eligible work and are reimbursed.<sup>20</sup>

Though RUSH operates within the framework of ESG, there are important differences between the two programs. Using its emergency authority, for example, HUD waived the consultation and public participation requirements embedded in the ESG program for the first of the two rounds of RUSH allocations and instituted a five-day comment period for the second allocation of funds. In addition, the agency waived the matching requirement included in the ESG program.<sup>21</sup> By incorporating such flexibilities within the general ESG framework, RUSH is designed to provide funding to localities as quickly as possible while also making use of the extensive experience of existing ESG grantees in working with local communities.

RUSH funds can be used by grantees to support certain activities or to assist households directly. The activities eligible for RUSH funding are similar to those eligible for funding under ESG. They include:

- Emergency shelter (congregate and non-congregate).
- Rapid re-housing or homelessness prevention, including through:
  - Assistance with short-/medium-term (up to 24 months) rental costs, as well as move-in and utility costs.
  - Housing relocation and stabilization services.
  - Supportive services for people currently experiencing homelessness.
- Street outreach services.
- Data management/administration services.

RUSH funds can also be used to assist households directly. The criteria for determining household eligibility are broad compared to those criteria used by FEMA programs. In general, households are determined eligible for RUSH funding when they satisfy three criteria:

- Recipients must be homeless or at risk of homelessness. Recipients meeting this description include individuals living in an emergency shelter, transitional housing, or a place not meant for human habitation, as well as people at risk of homelessness (i.e., those with incomes equal to or less than 30% of area median income and who either live in severely overcrowded homes, are facing eviction within 21 days, or have another risk factor for homelessness).
- Recipients must have been residing in an area that received TSA.

- Recipients must have needs that are not being met either by existing federal disaster relief programs or by programs provided by state or local governments that are funded via a federal or non-federal cost-share agreement. Importantly, if an individual or household was eligible for ESG prior to the disaster, they are not required to re-qualify under the RUSH program.<sup>22</sup>

It should be noted that while certain ESG-funded programs are restricted to citizens and non-citizens with a qualifying immigration status, most programs funded through RUSH are exempted from such immigration requirements. HUD has [determined](#) that Street Outreach Services, Emergency Shelter, and Rapid Re-Housing programs are not subject to immigration-based restrictions. When the participating jurisdiction or program operator owns or leases the building used to provide transitional housing, the program is similarly not subject to immigration-based restrictions. However, where a transitional housing program involves providing rental assistance payments to private landlords on behalf of program participants, the program is subject to immigration-based eligibility restrictions.<sup>23</sup>

RUSH funding allocations occur in two phases: the first addresses the needs of individuals who are ineligible for FEMA TSA but who are experiencing or are directly facing homelessness, while the second assists individuals who were receiving FEMA assistance but for whom that assistance was terminated at the statutory deadline of 18 months post-disaster (unless assistance was extended by the agency). HUD has specified that, due to the limited availability of funds, RUSH will not be implemented after every disaster. Instead, program allocations will depend on the approval of FEMA TSA under the Stafford Act.<sup>24</sup>

To determine initial program allocations, HUD created a funding formula using [Point-In-Time count](#) data on the number of persons experiencing sheltered or unsheltered homelessness in counties or local municipalities for which TSA was made available. The formula also takes into account factors like the Fair Market Rent for a one-bedroom apartment in TSA-approved areas and the capacity of organizations in the area to effectively utilize the funding, as demonstrated by a 60%-or-higher expenditure rate for similar funds allocated for COVID-19 response.

HUD activated the RUSH program for the first time in September 2022, after Hurricane Ian struck Florida and caused widespread damage. In response to the disaster, FEMA deployed significant resources in partnership with the Florida Division of Emergency Management and local partners, but high barriers for entry to FEMA's programs prevented many from accessing assistance. Following the launch of its new program, HUD made initial allocations of RUSH funds to the State of Florida and seven participating jurisdictions (PJs) in the state. However, the program's initial deployment was beset by a range of problems, slowing the implementation process and dampening RUSH's impact.

## IV. IMPLEMENTING RUSH IN FLORIDA

### *Background: Hurricane Ian*

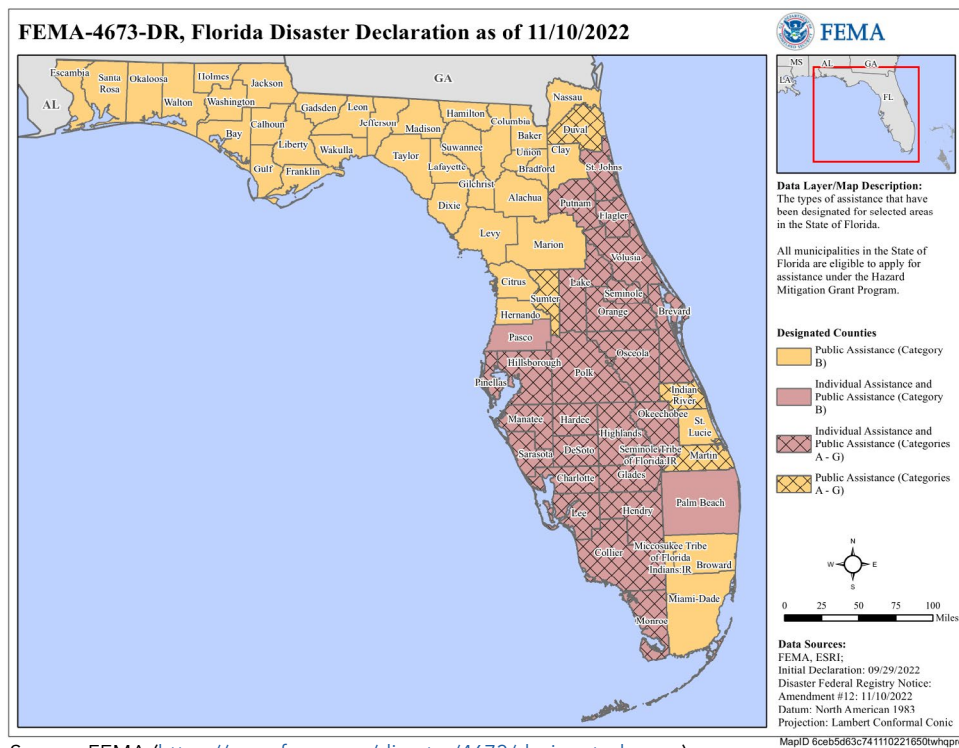
Hurricane Ian slammed into the southwest and central coasts of Florida as a Category 4 storm on September 28, 2022. While the storm had shifted south from its expected path, largely sparing the major population center of Tampa, it devastated coastal communities such as Fort Myers, Fort Myers Beach, Port Charlotte, Sanibel Island, Bonita Springs, Cape Coral, and Naples. Winds exceeded 100 mph, and historic levels of storm surge flooded oceanfront and inland neighborhoods with over 12 feet of water in some areas. The storm then moved across central Florida, dropping as much as 20 inches of rain and causing significant inland flooding. By the time it left Florida, Ian had become a tropical storm, but it soon re-strengthened into a Category 1 hurricane, striking the South Carolina coast during the afternoon of September 30.<sup>25</sup>

The storm caused the deaths of at least 149 Floridians, with 72 of those deaths occurring in Lee County. More than 5,000 homes were destroyed, and nearly 30,000 homes sustained severe damage. The storm was estimated to have caused \$112 billion in damage, making it the costliest hurricane in Florida history.<sup>26</sup>



Stick-built homes that met modern code requirements were largely spared destruction by Hurricane Ian. However, the impacted region was also home to many manufactured homes, which are an important source of affordable housing across the country but provide little protection during storms of Ian's magnitude. Aerial photographs of the aftermath showed significant damage to mobile home parks and manufactured housing communities across the impacted area.<sup>27</sup> In addition, the state remains a haven for older adults and is home to many people with disabilities, who are two to four times more likely to die or be seriously injured during a disaster. Many of the fatalities caused by Hurricane Ian were of older individuals who had sought to remain in their homes during the storm or who were unable to evacuate despite mandatory evacuation orders.<sup>28</sup>

### Map of Counties Approved for FEMA Individual Assistance Following Hurricane Ian



Source: FEMA (<https://www.fema.gov/disaster/4673/designated-areas>)

FEMA quickly approved Individual Assistance (IA) for 17 counties across the state, along with the Seminole Tribe of Florida. According to an analysis by DHRC member Texas Appleseed, by February 2023, FEMA had received 911,587 applications for assistance, with an approval rate of 42%. The vast majority (60%) of those approved for assistance received the default award of \$700 in FEMA Critical Needs Assistance, while only 71,581 households received some form of housing assistance.<sup>29</sup>

Consistent with its protocol, FEMA approved TSA for the 17 IA-approved counties. By the time the program expired in June 2023, TSA had temporarily sheltered only 4,584 households in hotels across the region – less than 1% of all applicants for FEMA assistance. Anecdotal evidence suggests that program accessibility was hampered by the need to travel long distances to find hotel room vacancies, a desire by hotel owners in adjacent regions of Florida to remain open to house tourists, and other significant barriers to assistance eligibility.<sup>30</sup>

### Implementation of RUSH

After observing the difficulties survivors faced in accessing FEMA assistance, HUD approved in October 2022 the first ever allocation of RUSH funding, disbursing a first round of funds to the State of Florida and seven

participating jurisdictions: Collier County, Lee County, the City of Orlando, Polk County, Seminole County, the City of Tampa, and Volusia County (Table 1).

**Table 1: Initial RUSH Funding Allocations by HUD (October 2022)**

<b>Grantee/PJ</b>	<b>Total RUSH Allocation</b>
Collier County	\$861,716
State of Florida	\$3,000,000
Lee County	\$288,673
City of Orlando	\$666,918
Polk County	\$374,935
Seminole County	\$386,784
City of Tampa	\$799,599
Volusia County	\$391,184
<b>TOTAL</b>	<b>\$6,769,809</b>

Source: HUD ([https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_22\\_220](https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_220))

However, it was not until February 2023 that any of the grantees began to allocate funds.<sup>31</sup> Only in June 2023 did the State of Florida complete its funding allocations. Most of these funds were provided to CoCs, and all state-allocated funds had to be spent in areas where FEMA TSA had been approved. Recipients of state funding included organizations in Brevard County, Flagler County, Pasco County, and Palm Beach (Table 2).<sup>32</sup>

The seven jurisdictions that received allocations mostly subgranted the funds to local CoCs for implementation. [Lee](#) County subgranted its funding to a program run by Catholic Charities that rehouses eligible households, for example, while [Volusia](#) County subgranted its funds to the Neighborhood Center of West Volusia and to Halifax Urban Ministries. The City of [Orlando](#) subgranted its funds to the Christian Service Center, and [Polk](#) County allocated funds to its local CoC.<sup>33</sup> As of September 2023, the City of [Tampa](#) had yet to provide its funds to any specific organizations.<sup>34</sup> Only one county, [Collier](#), opted to facilitate RUSH-funded activities itself.<sup>35</sup>

HUD stated that the second round of funds would be allocated later in the disaster recovery process and be based on an assessment of the extent of damage, with an emphasis on damage to rental units occupied by very low-income households. Data related to such damage gathered as part of a FEMA-required damage assessment following the disaster would be used to determine whether there was a severe, lasting need for additional housing assistance.<sup>36</sup> According to HUD personnel, the agency is planning to issue a Request for Information (RFI) in the *Federal Register* prior to the release of the second allocation. As of September 2023, neither the second allocation nor the accompanying RFI had been released.

### **Challenges in Implementation**

Multiple problems combined to slow the implementation of RUSH-funded programs in Florida. For one thing, funds arrived well past the date on which they were initially expected, impeding recovery efforts

from the beginning.<sup>37</sup> But advocates and others working on the ground suggested that additional challenges occurred at multiple levels of program implementation and ranged from the slow distribution of state-allocated funds to confusion about how disaster survivors could access the assistance provided by the program. Taken together, the challenges listed in this section show that even while doing their best to support housing and prevent homelessness in difficult circumstances, localities struggled to implement RUSH.<sup>38</sup>

**Table 2: Florida State Government Allocations of RUSH Funding**

<b>Grantee</b>	<b>Amount</b>
Suncoast Partnership to End Homelessness	\$165,688.36
Tampa Hillsborough Homeless Initiative	\$201,690.17
Homeless Coalition of Polk County	\$137,546.78
Volusia Flagler County Coalition for the Homeless	\$213,836.92
Homeless Services Network of Central Florida	\$222,981.11
Flagler Hospital	\$168,709.10
Brevard Homeless Coalition	\$88,949.83
Heartland Coalition for the Homeless	\$167,509.95
Pasco County CoC	\$44,542.68
Mid Florida Homeless Coalition	\$99,795.44
Gulf Coast Partnership	\$288,605.20
Lee County CoC	\$418,906.75
Palm Beach County Division of Human Services	\$158,444.96
Monroe County Homeless Services CoC	\$71,353.22
Collier County Hunger and Homeless Coalition	\$107,142.85
<b>TOTAL:</b>	<b>\$2,925,000.02</b>

Source: Florida Department of Children and Families ([https://floridajobs.org/docs/default-source/strategic-planning-2014/cdbg-final-2023-aap.pdf?sfvrsn=d08e5bb0\\_4](https://floridajobs.org/docs/default-source/strategic-planning-2014/cdbg-final-2023-aap.pdf?sfvrsn=d08e5bb0_4))

### **Lack of Clarity about Timing**

Local governments saw the need to spend an influx of RUSH funding as less urgent than other post-disaster tasks and integrated the funds into their typical reassessment of housing funds following a disaster, creating severe delays in program creation.<sup>39</sup> Though the State of Florida has increased recurring allocations for homelessness services and system capacity funding over the last year, compared to the need, homeless services are still significantly underfunded in Florida. In a state that underfunds homeless services, the lack of clarity about timing allowed the Florida government to drag its feet in distributing state-received funds and tie up unallocated funds in political discussions.<sup>40</sup> As a result, Florida only began to allocate its RUSH funds months after receiving them from HUD.

### **The Reimbursement Model**

For homeless services providers, the reimbursement model used by the RUSH program slowed the implementation of post-disaster programs, as providers chose to spend existing funds to regain capacity lost during the disaster while also reconstituting their work in the new, post-disaster environment. Even with the potential for reimbursement, many organizations' budgets simply did not have room for immediately expanding activities to respond to the needs of disaster survivors. Instead, many organizations sought simply to use previously allocated funds to which they had ready access before seeking to start new activities that would require future reimbursement.

## **Lack of Transparency and Information Sharing**

A lack of information about the implementation process also impeded program implementation. Information released by state and local entities was frequently confusing to disaster survivors. For instance, an [announcement](#) issued by Lee County stated that the county was requesting applications for RUSH funding with a deadline of early 2023, which could have led those unfamiliar with ESG procurement practices to believe that RUSH funding had been exhausted as of mid-2023 and that applications for assistance would not be accepted, despite the fact that the county was calling for applications from organizations willing to facilitate RUSH programs. Such confusion can be counterproductive for both advocates and disaster survivors.<sup>41</sup>

As late as September 2023, information regarding RUSH program activities continued to be frustratingly difficult to access, even for individuals aware of how the ESG program functions. At the time of writing, for example, the [Collier County government page](#) asked visitors to contact a generic email address to receive a questionnaire to determine their eligibility for the county's program. Even the county's 2023 Annual Action Plan provided virtually no information about RUSH.<sup>42</sup> Indeed, [that plan](#) contained only one sentence related to the program: "The County will directly administer the ESG RUSH grant."<sup>43</sup> Likewise, the City of Tampa offered no information about the use of the funds, aside from noting the funds had yet to be provided to organizations or agencies.<sup>44</sup>

## **Lack of Familiarity with ESG**

Ideally, agency staff in jurisdictions receiving RUSH funding already have experience administering the ESG program. However, many staff in jurisdictions that received RUSH funds during the first allocation appeared to have only a passing familiarity with ESG program requirements. Lower levels of familiarity were usually sufficient for executing the consolidated planning process required to receive ESG, but agency staff who were not familiar with the intricacies of the program were quickly overwhelmed when faced with the need to process and distribute emergency funds via RUSH. Anecdotal evidence suggests that the level of familiarity with ESG among agency staff in participating jurisdictions was a significant factor in how quickly – or slowly – funds were disbursed. Unfamiliarity with or under-prioritization of ESG and other homeless assistance programs led to delays in implementation.

## **Confusion about Integrating RUSH with Existing Programs**

Conversations with advocates and homeless services providers working on the ground in Florida indicate that many RUSH grantees viewed the resulting programs as separate from their usual ESG-funded activities. As a result, program implementation was slowed at the local level, creating additional sticking points when it came to distributing funds allocated to the state. This perception existed among advocates and homeless services providers for several reasons. First, the ESG funding normally received by RUSH recipients had already been allocated for the year, without accounting for the potential need to serve disaster-impacted individuals. To utilize the new RUSH funds, the ESG plan needed to be reopened and reevaluated. While HUD did issue important regulatory waivers to ease the process of amending ESG plans, the work needed to amend these plans presented a significant roadblock and stalled the creation of a new program. Second, several RUSH funding grantees were not performing those activities needed to serve disaster-impacted individuals prior to the disaster. For this reason, these grantees were required to establish novel programs, a task that required significant capacity to accomplish, even with the waivers issued by HUD.

## **Inconsistent CoC Involvement**

The level of CoC involvement in handling RUSH-related subgrants varied by jurisdiction. While HUD requires recipient jurisdictions to consult with applicable CoCs when deploying ESG funds, the level of compliance ranges from close partnership to a perfunctory notification of funding availability. As such, CoC involvement

in deploying RUSH funding likely mirrored the level of involvement with ESG funding. In areas where CoC involvement in ESG funding decisions was sub-optimal, sustained effort by a CoC was needed if it was to be actively involved in decisions regarding RUSH. However, because some CoCs did not fully understand their role in disaster recovery, they viewed this work as outside their scope, meaning that experienced advocates were not fully involved in conversations about how to implement this important funding.

The uneasiness surrounding disaster recovery also translated to other activities conducted by CoCs post-disaster. While many CoCs have risen to the occasion and worked with volunteer shelter operators to connect disaster survivors with services, many others lack engagement with disaster response personnel and those working on the housing support function during disaster recovery efforts.

## V. RECOMMENDATIONS

RUSH exists to fill gaps in assistance left by FEMA programs, which are often inaccessible to households with low-incomes and individuals experiencing homelessness. Yet a year after Hurricane Ian struck their state, many Floridians who should have received support through RUSH were continuing to experience homelessness, according to [surveys](#) conducted in impacted counties.<sup>45</sup> Left out of these surveys were those who had been forced to leave the area where they lived after being unable to access RUSH funds at all.

Such implementation delays must be remedied before the RUSH program is deployed again. In this section, we provide recommendations for how HUD can improve RUSH program implementation. Given the stakes for the individuals assisted by RUSH, these recommendations should be adopted by HUD as soon as possible to ensure that future RUSH allocations are not hampered by the problems evident during the program's initial implementation in Florida.

### *Ensure RUSH Funding Is Allocated Equitably*

HUD requires that FEMA's TSA program be approved for a disaster-impacted area if that area is to receive RUSH funding. Historically, FEMA is less likely to approve the TSA program for disasters that impact rural, minority, and low-income communities. Many of these communities also experience higher rates of homelessness.<sup>46</sup> Research continues to show that Black, Indigenous, Hispanic, and Asian American and Pacific Islander households experience disproportionately greater rates of [homelessness](#).<sup>47</sup> By tying RUSH funds to the approval of FEMA's TSA program, HUD is ensuring that these disparities will be replicated. As a result, localities like Mississippi, Alaska, and Guam, which all experienced significant disasters after the creation of the RUSH program, as well as many other similar communities across the country that are likely to receive disproportionately low amounts of FEMA assistance despite their extreme housing needs, are unable to receive RUSH funding because they were not approved for TSA. **For these reasons, HUD should ensure that decisions to allocate disaster assistance do not reinforce pre-existing racial disparities. The agency should explore alternative ways to ensure equity when deploying RUSH funds.**

### *Make RUSH Grants "Forward Funded"*

RUSH funding, like ESG, is reimbursement-based. Participants are required to spend funds on activities eligible for reimbursement, with payment provided out of allocated funds after the fact. While reimbursement-based programs for disaster recovery exist in other formats – for example, FEMA's Public Assistance program – the constraints imposed by this model constitute a major barrier insofar as they disincentivize cash-strapped local and state governments and homeless service providers from taking on additional, disaster-related work under the RUSH program.<sup>48</sup>

Local and state governments must often spend money up front during and immediately following a disaster before subsequently seeking reimbursement from the federal government in the months and years after.

In addition, service providers commonly experience significant disruptions in their activities during and after disasters, making their operations more expensive. For local and state governments, this “funding crunch” results in even less of an incentive than usual to spend public funds on programs assisting those experiencing homelessness – even if these funds are to be promptly reimbursed – instead of other disaster recovery priorities, such as debris removal, infrastructure repair, and other necessary activities for restoring communities.<sup>49</sup> In consequence, local and state governments will likely wait until other disaster recovery priorities are addressed before spending funds on RUSH-related activities, further delaying services.

**Instead of providing RUSH funds via a reimbursement model, funds should be provided up front to allow for the quick implementation of activities.** Providing funding up front would better support organizations on the ground as they reconstitute and expand their services in the aftermath of a disaster, while also allowing state and local governments to immediately fund such programs. This so-called “forward funding” would also incentivize CoCs, service providers, and state and local governments to adequately prioritize programs assisting individuals experiencing homelessness in the aftermath of a disaster.

### *Impose Timing Requirements to Speed RUSH Implementation*

Incongruous timing requirements for state and local funding tranches have led to additional delays in the distribution of RUSH funds. Instead of requiring recipients of RUSH assistance to begin spending funds at a certain point following the date of allocation, the funds can be used at any point during the following several years, in line with the standard set by ESG.<sup>50</sup> Even so, and in contrast with ESG, RUSH funding is meant to assist disaster survivors in a relatively narrow space of time following the impact of a disaster. As demonstrated by the first allocation of RUSH funding, delays in standing up programs lessen the program effectiveness.

**Future allocations of RUSH funding should be accompanied by timing requirements that complement FEMA programs.** Attaching a requirement that RUSH funds be used to actively assist on-the-ground programs within 30 days of the date of RUSH funding activation – or an equivalent amount of time following the funding allocation – would dramatically speed the creation or expansion of disaster-oriented programs supported by RUSH. While such turn-around times are rare when it comes to HUD funding, the need for these funds to be used to assist those ineligible or unable to access FEMA assistance necessitates quick implementation and should take precedence over other state and local government priorities. Gaps in service can be addressed by aligning such requirements with existing FEMA timelines.

### *Help Integrate RUSH and Non-RUSH ESG Programs*

The utility of using an existing funding stream to allocate RUSH funding is that novel programs need not be developed to implement eligible activities – a task that can prove difficult, given the capacity restraints in post-disaster environments. **When allocating RUSH funding in the future, HUD must work to clarify the benefits of synchronizing RUSH and ESG activities and ensure that regulatory waivers provided to RUSH recipients are sufficient to allow modification of existing ESG plans without a significant effort.** Doing so will help ensure that ESG- and RUSH-related activities operate more harmoniously. In addition, removing administrative barriers would further reduce delays in the deployment of these important funds.

### *Improve Assistance with Guidance and Planning for Jurisdictions*

While unfamiliarity is likely to occur with any newly created program, the lack of concrete guidance and recommendations from HUD regarding how to use RUSH funds bred hesitancy among recipient jurisdictions when it came to spending funds quickly, delaying program implementation and leading to less-than-ideal approaches to spending funds in Florida.

**HUD should create detailed guidance and provide technical assistance regarding how to access RUSH funds, how to amend comprehensive plans to account for RUSH funds, and what the funds can be used to do.** The greater the level of specificity, the easier implementation will be for jurisdictions that might be unfamiliar with the ESG process and how it can be used to assist in disaster recovery.

To be sure, HUD has created helpful materials regarding disaster recovery and the ESG program, but advocates note anecdotally that jurisdictions typically are not aware of these resources and therefore do not utilize them fully. Instead, local, state, and national advocates tend to make these materials available to jurisdictions. While the advocacy community plays an important role, it is not responsible for the dissemination of federal recommendations and guidance and has limited capacity and reach for supporting this process. The current system of disseminating resources and information leaves large gaps, resulting in many jurisdictions not receiving resources created by HUD. **Materials created by HUD on RUSH program implementation must be directly distributed in advance of a disaster to all jurisdictions receiving ESG, ensuring that administrators are familiar with eligible RUSH activities and can put implementation plans in place.**

In addition to descriptive guidance and support materials, **HUD should modify the requirements for comprehensive plans to better facilitate the receipt and deployment of emergency disaster recovery-related RUSH funds. Pre-disaster planning is an essential part of any disaster response.**<sup>51</sup> By requiring jurisdictions to incorporate some level of disaster planning, in part involving RUSH funding, jurisdictions can be better prepared when funds are made available after a disaster. In addition to facilitating the deployment of RUSH funding, modifications to comprehensive plans can also better anticipate how other HUD recovery programs, such as the CDBG-DR program, can be used in both immediate and long-term recovery efforts. Regardless, HUD should be prepared to dedicate significant field office capacity to assist jurisdictions that receive RUSH assistance to help move these important funds out the door as quickly as possible.

### ***Boost Assistance with Guidance and Planning for Continuums of Care***

Actively involving CoCs in planning and implementation of the RUSH program can help build the political and bureaucratic will needed to deploy RUSH funds and quickly address the needs of those who are homeless or in danger of becoming homeless.

To spur CoC involvement in deploying RUSH funds, CoCs must be made more aware of the potential involved in using these funds. **HUD should ensure that CoCs receive detailed guidance regarding how RUSH funds can be utilized to bolster CoC activities in the context of disaster recovery.** In addition, such guidance should lay out why such funds are necessary, given the eligibility constraints and high denial rates typical in pre-existing disaster recovery programs. Doing so can ensure that CoCs are informed and eager to be at the table in conversations about RUSH implementation.

While HUD has released an excellent “[Disaster Homelessness Toolkit](#),” **the agency should do more to publicize disaster resources to CoCs and ensure that their role is clearly delineated in response and recovery efforts after disasters.** In many situations, the service providers and advocates of local CoCs are often the only individuals working in a recovery scenario who are explicitly focused on the needs of individuals and families experiencing homelessness.

### ***Improve Assistance in Resolving Capacity Issues at Local Levels***

Capacity is a perpetual challenge during disaster recovery.<sup>52</sup> As discussed earlier, many jurisdictions appeared unaware of the intricacies of ESG funding and may have been unfamiliar with the program. This lack of familiarity can prevent the speedy implementation of RUSH funds and tends to saddle local governments that are already operating at capacity and facilitating multiple aspects of disaster recovery with additional tasks.

In addition, area non-profit organizations may also lack capacity to facilitate a new program, making it especially difficult for local governments to find providers able to take over a new project – especially if the impacted area is assisted by smaller non-profits that are more vulnerable to disasters.<sup>53</sup> Program administrators often turn to vendors and contractors to solve capacity shortages, but these workers may be unfamiliar with local governments and program guidelines and processes, resulting in inefficiencies.

HUD should thus do what it can to help ease the impact of these new programs on the capacity of local governments recently affected by disasters. **Ensuring that staff from field offices and other HUD personnel are on the ground in areas allocated RUSH funding will help the agency address such capacity shortfalls.** By providing direct capacity support, HUD can ensure that RUSH recipients have both the capacity and technical expertise needed to stand up this critical program quickly.

ESG and RUSH both set a 7.5% cap on funds used for administrative capacities to support program implementation.<sup>54</sup> **HUD should consider increasing that cap in the case of the RUSH program to allow for greater system response capacity.**

### *Promote Community Engagement and Transparency*

Engaging communities and their advocates concerning the form and scope of disaster recovery programs is critical to programs' success.<sup>55</sup> This engagement includes not only supporting the ability of communities to offer public comments or recommendations regarding potential programs, but also helping communities find timely information about program expenditures and funded activities as they occur. In the case of RUSH, communities receiving funds are often not aware of the program's implementation specificities. In addition, given the cross-field nature of disaster recovery, many individuals and advocates with little to no knowledge of HUD programs are actively working to support any number of disaster survivors in an impacted area, making the distribution of clear information about the program even more critical. Difficulty finding information regarding program specificities can also stymie efforts to expand and improve upon disaster recovery assistance programs, including RUSH.

Relying solely on press statements from HUD and public notices of ESG Action Plan amendments to detail where funding is being distributed breeds confusion among disaster survivors and their advocates. For many disaster survivors in a desperate situation, the promise of rapid rehousing funding presents a crucial lifeline towards stable housing and the benefits it provides. **Information about funding allocations must be accompanied by detailed information regarding where disaster survivors can access such funds. HUD should not assume this is occurring at the local level.** By not making available the information necessary to access program funds, the agency is creating needless frustration in disaster-impacted communities that are already dealing with significant disaster-related trauma, which is only exacerbated by the lack of access to disaster recovery resources.

For individuals working to support disaster-impacted communities and who may not be familiar with the intricacies of HUD programs, the lack of information breeds confusion. As a result, RUSH funds can be discounted as a valid source of federal disaster recovery assistance by local officials and advocates on the ground. **HUD should work internally to produce a detailed fact sheet on RUSH and work with each county to provide information on the program, including the specific activities being funded, the specific partners working with the funds, and additional program information.**

Opportunities for public comment are a mainstay of HUD's CDBG-DR program.<sup>56</sup> Although the scope and funding at stake with RUSH is well below the amount typically allocated via CDBG-DR, the same principles apply. The ability to publicly comment on the distribution of disaster recovery funding is crucial to a successful disaster recovery.<sup>57</sup> Currently, the only public notices provided for the use of RUSH funds are the ESG Action Plan amendment notices required to be released by each jurisdiction and individual



county council agenda notices that typically do not specifically address RUSH funding but rather ESG funding overall.<sup>58</sup> This means there is little to no awareness that specific input could be provided by disaster-impacted community members on implementation of this disaster recovery program. **HUD must work with jurisdictions receiving HUD funding to ensure that adequate notice of public comment is provided to disaster-impacted individuals.**

## VI. CONCLUSION

For decades, it has been obvious that disasters disproportionately impact households with low incomes and that the current system for the distribution of disaster assistance is inaccessible at best. Now, with disasters increasing in frequency and intensity, more individuals experiencing homelessness will be impacted, and more households will face disaster-induced homelessness. The RUSH program represents a sea-change in how HUD views its role in the disaster response process. Yet while the agency's effort to address the gaps in the current system by providing fast, low-barrier access to housing through its new RUSH program is laudable, realizing the program's full potential requires improving how it is put into practice. We urge HUD to implement the recommendations provided in this report in advance of future allocations of RUSH funding to ensure that the lowest-income renters and people experiencing homelessness have the support they need when the next disaster strikes.

### About

The **National Low Income Housing Coalition (NLIHC)** is dedicated to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice. Our members include state and local housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While NLIHC members include the spectrum of housing interests, they do not represent any segment of the housing industry. Rather, we focus on housing policy and funding improvements for extremely low-income people who receive and those who need assistance.

NLIHC leads the Disaster Housing Recovery Coalition (DHRC) of more than 900 national, state, and local organizations, including many working directly with disaster-impacted communities and with firsthand experience recovering after disasters. The DHRC works to ensure that federal disaster recovery efforts reach all the lowest-income and most marginalized survivors.

The mission of the **National Housing Law Project (NHLP)** is to advance housing justice for people living in poverty and their communities. NHLP achieves this by strengthening and enforcing the rights of tenants and low-income homeowners, increasing housing opportunities for underserved communities, and preserving and expanding the nation's supply of safe and affordable homes. NHLP also provides technical assistance and policy support on a range of housing issues to legal services and other advocates nationwide. Housing security is an essential component of racial and civil equality and a critical foundation for education, health, employment, social engagement, and opportunity. We provide communities and their advocates with the tools they need to advance those rights.

NHLP hosts the national Housing Justice Network (HJN), a vast field network of over 2,000 community-level housing advocates and resident leaders. HJN member organizations are committed to protecting affordable housing and residents' rights for low-income families across the country. Our work is grounded in the realities that shape poor people's housing choices. Towards that end, we bring the grassroots perspective of our national network into the policy conversation.

# ENDNOTES

- 1 United States Department of Housing and Urban Development. (2022, October 24). Fact Sheet: HUD Deploys First Round of Funding Through New Rapid Response Program to Address Homelessness in Areas Hit by Disasters [Press release]. U.S. Department of Housing and Urban Development. [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_22\\_220](https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_220)
- 2 National Low Income Housing Coalition. (2022). Top Priorities for Disaster Recovery. National Low Income Housing Coalition. [https://nlihc.org/sites/default/files/DHRC-Priorities\\_Disaster-Recovery-Package.pdf](https://nlihc.org/sites/default/files/DHRC-Priorities_Disaster-Recovery-Package.pdf)
- 3 Duffy, M. and Shaefer, H. L. (2022). In the Aftermath of the Storm: Administrative Burden in Disaster Recovery, 96 *Social Service Review* 3 <https://www.journals.uchicago.edu/doi/abs/10.1086/721087>; Sweeney, K., Wiley, H., and Kousky, C. (2022). The Challenge of Financial Recovery from Disasters: The Case of Florida Homeowners After Hurricane Michael. University of Pennsylvania Wharton School of Business Risk Management and Decision Processes Center. <https://esg.wharton.upenn.edu/wp-content/uploads/2023/07/Hurricane-Michael-The-Challenge-of-Financial-Recovery-from-Disasters.pdf>
- 4 Deepak, L. and Santiago-Bartolomei, R. (2023). Who Gets Emergency Housing Relief? An Analysis of FEMA Individual Assistance Data After Hurricane Maria. *Housing Policy Debate* 33(5), 1146-1166. <https://www.tandfonline.com/doi/abs/10.1080/10511482.2022.2055612>
- 5 Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288, as amended, 42 U.S.C. 5121 et seq.
- 6 Martin, C. et al. (2019). Housing Recovery and CDBG-DR. U.S. Department of Housing and Urban Development.
- 7 United States Department of Homeland Security Secretary Alejandro N. Mayorkas. Memorandum from Alejandro N. Mayorkas to U.S. ICE, U.S. CBP, U.S. CIS, DHS Office of Strategy, Policy, and Plans, U.S. Department of Homeland Security Office of Civil Rights and Civil Liberties, U.S. Department of Homeland Security Privacy Office. (2021, October 27). [https://www.dhs.gov/sites/default/files/publications/21\\_1027\\_opa\\_guidelines-enforcement-actions-in-near-protected-areas.pdf](https://www.dhs.gov/sites/default/files/publications/21_1027_opa_guidelines-enforcement-actions-in-near-protected-areas.pdf)
- 8 Teles, D. et al. (2023). Rapid Rehousing After Disaster. Urban Institute. <https://www.urban.org/sites/default/files/2023-09/Rapid%20Rehousing%20after%20Disaster.pdf>
- 9 National Alliance to End Homelessness. (2020). Racial Inequalities in Homelessness, by the Numbers. National Alliance to End Homelessness. <https://endhomelessness.org/resource/racial-inequalities-homelessness-numbers/>
- 10 Levine, A. (2018, December 3). After a California wildfire, new and old homeless populations collide. *New York Times*. <https://www.nytimes.com/2018/12/03/us/california-fire-homeless.html>
- 11 Jenkins, P. et al. (2015). Local Nonprofit Organizations in a Post-Katrina Landscape: Help in a Context of Recovery. *American Behavioral Scientist* 59(10). <https://journals.sagepub.com/doi/10.1177/0002764215591183>
- 12 Patton, N. (2023). Disaster Housing Programs. National Low Income Housing Coalition. <https://nlihc.org/sites/default/files/2023-03/2023AG6-10-Disaster-Housing-Programs.pdf>
- 13 Ma, C. and Culhane, D. (2021). Addressing Low-Income Household Sheltering Needs After a Disaster: A Needs Assessment Among Hurricane Harvey Housing Victims. *Housing Studies*. <https://www.tandfonline.com/doi/abs/10.1080/02673037.2022.2149704>
- 14 National Low Income Housing Coalition. (2017). Disaster Housing Assistance Program. National Low Income Housing Coalition. <https://nlihc.org/sites/default/files/DAHP-Program.pdf>
- 15 United States Government Accountability Office. (2020). Disaster Housing: Improved Cost Data and Guidance Would Aid FEMA Activation Decisions. U.S. Government Accountability Office. <https://www.gao.gov/products/gao-21-116>
- 16 United States Department of Housing and Urban Development. (2022, October 24). Fact Sheet: HUD Deploys First Round of Funding Through New Rapid Response Program to Address Homelessness in Areas Hit by Disasters [Press release]. [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_22\\_220](https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_220)
- 17 United States Department of Housing and Urban Development Office of Special Needs Assistance Programs Division Director Karen DeBlasio. (2023, March 20). Presentation to Council of State Community Development Agencies on Rapid Unsheltered Survivor Housing (RUSH). <https://coscda.org/wp-content/uploads/2023/03/DeBlasio-RUSH-COSCA-3-20-2023.pdf>
- 18 Lee, J. L. and Van Zandt, S. (2018). Housing Tenure and Social Vulnerability to Disasters: A Review of the Evidence. *Journal of Planning Literature* 34(2). <https://journals.sagepub.com/doi/abs/10.1177/0885412218812080>
- 19 United States Department of Housing and Urban Development. (2019). Emergency Solutions Grants (ESG) Program. U.S. Department of Housing and Urban Development. <https://files.hudexchange.info/resources/documents/EmergencySolutionsGrantsProgramFactSheet.pdf>
- 20 Missouri Housing Development Commission. (2022). Emergency Solutions Grant Desk Guide. Missouri Housing Development Commission. <https://mhdc.com/media/3fthit2f/fy2022-esg-desk-guide.pdf>
- 21 United States Department of Housing and Urban Development. (2022, October 24). Fact Sheet: HUD Deploys First Round of Funding Through New Rapid Response Program to Address Homelessness in Areas Hit by Disasters [Press release]. [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_22\\_220](https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_220)
- 22 United States Department of Housing and Urban Development Office of Special Needs Assistance Programs Division Director Karen DeBlasio. (2023, March 20). Presentation to Council of State Community Development Agencies on Rapid Unsheltered Survivor Housing (RUSH). <https://coscda.org/wp-content/uploads/2023/03/DeBlasio-RUSH-COSCA-3-20-2023.pdf>
- 23 United States Department of Housing and Urban Development (2016). The Personal Responsibility and Work Opportunity Act of 1996 and HUD's

- Homeless Assistance Programs. Office of Special Needs Assistance Programs. <https://files.hudexchange.info/resources/documents/PRWORA-Fact-Sheet.pdf>
- 24 United States Department of Housing and Urban Development. (2022, October 24). Fact Sheet: HUD Deploys First Round of Funding Through New Rapid Response Program to Address Homelessness in Areas Hit by Disasters [Press release]. [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/hud\\_no\\_22\\_220](https://www.hud.gov/press/press_releases_media_advisories/hud_no_22_220)
- 25 State of Florida. (2023). Action Plan for Disaster Recovery. State of Florida. <https://www.floridajobs.org/docs/default-source/office-of-disaster-recovery/hurricane-ian/final-state-of-florida-action-plan-ian-for-hud-review-9-13-2023.pdf>
- 26 State of Florida. (2023). Action Plan for Disaster Recovery. State of Florida. <https://www.floridajobs.org/docs/default-source/office-of-disaster-recovery/hurricane-ian/final-state-of-florida-action-plan-ian-for-hud-review-9-13-2023.pdf>
- 27 Burnett, J. (2022, October 9). Hurricane Ian highlighted the vulnerabilities of older mobile homes. *National Public Radio*. <https://www.npr.org/2022/10/09/1127714293/hurricane-ian-older-mobile-homes-florida-destroyed>
- 28 O'Donnell, C. (2022, October 21). Hurricane Ian was lethal for elderly, those with chronic health conditions. *Tampa Bay Times*. <https://www.tampabay.com/hurricane/2022/10/21/hurricane-ians-lethal-elderly-those-with-chronic-health-conditions>
- 29 Laycock, J. (2023, February 25). Hurricane Ian: Individual Assistance Analysis. Texas Appleseed. [https://www.texasappleseed.org/sites/default/files/HurricaneIan\\_2.25\\_updated.pdf](https://www.texasappleseed.org/sites/default/files/HurricaneIan_2.25_updated.pdf)
- 30 United States Federal Emergency Management Agency. (2023, June 2). Transitional Sheltering Assistance Ends [Press release]. U.S. Federal Emergency Management Agency. <https://www.fema.gov/press-release/20230608/transitional-sheltering-assistance-ends>
- 31 Orlando was the first jurisdiction to announce an allocation of RUSH funds, doing so in early February 2023. See Cardinal, S.T. (2023, February 6). Christian Service Center gets \$617,000 of federal funds for “Rapid Rehousing” Program. *The Community Paper*. <https://www.yourcommunitypaper.com/articles/christian-service-center-gets-617000-of-federal-funds-for-rapid-rehousing-program>
- 32 Florida Department of Children and Families, Florida Department of Commerce, Florida Department of Health, Florida Housing Finance Corporation, State of Florida. (2023). 2023 Annual Action Plan. <https://floridajobs.org/docs/default-source/strategic-planning-2014/cdbg-final-2023-aap.pdf>
- 33 Lee County Continuum of Care Governing Board Meeting. (2023, March 8). Meeting Minutes. <https://www.leegov.com/dhs/Documents/CoC/CoC%20Meeting%20Minutes%2003-08-23.pdf> ; County of Volusia Community Assistance Division. (2023). Fiscal Year 2023-2024 Annual Action Plan. Volusia County, Florida. [https://www.volusia.org/core/fileparse.php/5916/urlt/FY\\_23.24\\_Annual\\_Action\\_Plan\\_and\\_Appendices\\_ADA.pdf](https://www.volusia.org/core/fileparse.php/5916/urlt/FY_23.24_Annual_Action_Plan_and_Appendices_ADA.pdf) ; Polk County. (2022, December). 2022-2023 Annual Action Plan, Amend. No. 1 Adding ESG RUSH Funded Activities – Amended Pages to the 2022-2023 Annual Action Plan. <https://www.polk-county.net/docs/default-source/housing-and-neighborhood-development/esg-rush-amd-no-1-aap-2022-2023.pdf>
- 34 City of Tampa. (2023, October). ESG RUSH Program. City of Tampa. <https://www.tampa.gov/housing-and-community-development/community-development/esg-rush>
- 35 Collier County. (2023). 2023 Annual Action Plan DRAFT. Collier County. <https://www.colliercountyhousing.com/wp-content/uploads/Collier-County-2023-AAP-5.18.pdf>
- 36 United States Department of Housing and Urban Development Office of Special Needs Assistance Programs Division Director Karen DeBlasio. (2023, March 20). Presentation to Council of State Community Development Agencies on Rapid Unsheltered Survivor Housing (RUSH). <https://coscda.org/wp-content/uploads/2023/03/DeBlasio-RUSH-COSDA-3-20-2023.pdf>
- 37 Fogerty, K. (2022, November 4). Collier, Lee still haven't used their RUSH funds allocated to help those Ian left homeless. *WUSF*. <https://www.wusf.org/weather/2022-11-24/collier-lee-still-havent-used-their-rush-funds-allocated-to-help-those-ian-left-homeless>
- 38 The information presented in this section was gathered through conversations and research conducted by NLIHC and NHLP, with assistance from state-level advocates.
- 39 Freeman, L. (2022, October 19). Homeless and limited affordable housing took a big hit in Collier from Hurricane Ian. *Naples Daily News*. <https://www.naplesnews.com/story/weather/hurricanes/2022/10/19/hurricane-ian-storm-surge-damage-aggravates-affordable-housing-shortage-homelessness-collier-county/10487915002/> ; Liebson, R. (2022, December 8). Renters Displaced By Hurricane Ian Left With Nowhere to Go. *Tampa Bay Times*. <https://www.tampabay.com/news/real-estate/2022/12/08/renters-displaced-by-hurricane-ian-left-with-nowhere-go>
- 40 Shinn, G. (2014). The Cost of Long-Term Homelessness in Central Florida. RethinkHomelessness.org. <https://shnny.org/uploads/Florida-Homelessness-Report-2014.pdf>
- 41 Quarantelli, E.L. (1987). The Social Science Study of Disasters and Mass Communications. Disaster Research Center. University of Delaware. <https://udspace.udel.edu/server/api/core/bitstreams/a47885d5-4546-42fa-bc34-93319bd25550/content>
- 42 Collier County. (2023). 2023 Annual Action Plan DRAFT. <https://www.colliercountyhousing.com/wp-content/uploads/Collier-County-2023-AAP-5.18.pdf>
- 43 Collier County. (2023). 2023 Annual Action Plan DRAFT. pg. 56. <https://www.colliercountyhousing.com/wp-content/uploads/Collier-County-2023-AAP-5.18.pdf>
- 44 City of Tampa, “ESG RUSH Program,” Tampa.gov (October, 2023), <https://www.tampa.gov/housing-and-community-development/community-development/esg-rush>
- 45 Florida Council on Homelessness. (2023, June). Annual Report. Florida Department of Children and Families. <https://www.myflfamilies.com/sites/default/files/2023-07/Florida%27s%20Council%20On%20Homelessness%20Annual%20Report%202023.pdf>

- 46 Emrich, C., Aksha, S.K., and Zhou, Y. (2022, May) Assessing Distributive Inequities in FEMA's Disaster Recovery Assistance Fund Allocation International. *Journal of Disaster Risk Reduction* 74. <https://www.sciencedirect.com/science/article/pii/S2212420922000747> ; Drakes, O. et al. (2021). Social Vulnerability and Short-Term Disaster Assistance in the United States. *International Journal of Risk Reduction* 53(1). <https://www.sciencedirect.com/science/article/pii/S2212420920315120>
- 47 National Alliance to End Homelessness. (2020). Racial Inequalities in Homelessness, by the Numbers. National Alliance to End Homelessness. <https://endhomelessness.org/resource/racial-inequalities-homelessness-numbers>
- 48 Kelly, C. (1995). A Framework for Improving Operational Effectiveness and Cost Efficiency in Emergency Planning and Response. *Disaster Prevention and Management* 4(3), pp. 25-31. <https://www.emerald.com/insight/content/doi/10.1108/09653569510088041/full/html>
- 49 Johnson, L.A. and Olshansky, R.B. (2017). After Great Disasters: An In-Depth Analysis of How Six Countries Managed Community Recovery. Lincoln Institute of Land Policy. Cambridge, MA.
- 50 United States Department of Housing and Urban Development. (2019). Emergency Solutions Grants (ESG) Program. U.S. Department of Housing and Urban Development. <https://files.hudexchange.info/resources/documents/EmergencySolutionsGrantsProgramFactSheet.pdf>
- 51 Perry, R. and Lindell, M. (2007). Emergency Planning. John Wiley and Sons. Hoboken, NJ.
- 52 Phillips, B. (2016). Disaster Recovery. CRC Press. Boca Raton, FL.
- 53 Chen, X. (2021). Are Disasters Disastrous to Nonprofit Organizations? Investigating the Financial Implications of Hurricane Sandy for Nonprofits. *Nonprofit and Voluntary Sector Quarterly* 51(1). <https://journals.sagepub.com/doi/full/10.1177/0899764021998454>
- 54 United States Department of Housing and Urban Development Office of Special Needs Assistance Programs Division Director Karen DeBlasio. (2023, March 20). Presentation to Council of State Community Development Agencies on Rapid Unsheltered Survivor Housing (RUSH). <https://coscda.org/wp-content/uploads/2023/03/DeBlasio-RUSH-COSDA-3-20-2023.pdf>
- 55 Horney, J. et al. (2016, August). Engaging the Public in Planning for Disaster Recovery. *International Journal of Disaster Risk Reduction* 17, pp. 33-37. <https://www.sciencedirect.com/science/article/pii/S2212420915301680>
- 56 88 FR 32046. <https://www.hud.gov/sites/dfiles/CPD/documents/FR-6393-N-01-AAN.pdf>
- 57 Horney, J. et al. (2016, August). Engaging the Public in Planning for Disaster Recovery. *International Journal of Disaster Risk Reduction* 17, pp. 33-37. <https://www.sciencedirect.com/science/article/pii/S2212420915301680>
- 58 See, e.g., Polk County. (2022, December). 2022-2023 Annual Action Plan, Amend. No. 1 Adding ESG RUSH Funded Activities – Amended Pages to the 2022-2023 Annual Action Plan. <https://www.polk-county.net/docs/default-source/housing-and-neighborhood-development/esg-rush-amd-no-1-aap-2022-2023.pdf>

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