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Photo credit: Stephania Tarrant, Louisiana Just Recovery Network

How to Use This Resource

America's disaster 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 hardest hit but have the fewest resources and face the longest, steepest path to recovery. Despite the clear need for assistance, federal efforts often leave low-income disaster survivors without the resources necessary to recover and the support needed to make their communities more resilient in the face of future disasters. The result is a disaster housing recovery framework that exacerbates and reinforces racial, income, and accessibility inequities at each stage of response and recovery.

Community-based organizations and advocates continue to be on the front line of disaster recovery, working to provide their neighbors with the assistance they need and helping raise the voices of low-income residents to ensure that every survivor receives the necessary support to recover after a disaster. However, the disaster assistance response and recovery system can be complicated, convoluted, and confusing to navigate.

Members of the NLIHC-led Disaster Housing Recovery Coalition (DHRC), a group of over 900 local, state, and national organizations working to ensure that all disaster survivors have the resources they need to fully recover, have helped hundreds of communities across the country quickly understand the disaster assistance system and respond to disasters with advocacy for their communities. The "Resources for Disaster Response, Recovery, and Resilience: A Toolkit for Advocates and Community-Based Organizations," is designed to arm organizations grappling with a disaster or preparing for a future disaster with information, enabling them to easily understand major issues that may arise during disaster recovery and respond effectively via advocacy. The guide covers the phases of disaster recovery-short-term recovery, long-term recovery, resilience and mitigation-with subtopics that detail basic information about the issue, provide sample talking points, and include a template letter to relevant federal, state, or local officials. This material originates from past successful efforts conducted by members of the DHRC and can enable organizations to easily educate relevant policymakers about the needs of their community. For ease in usability and to help with integrating resources into practice, Word versions of each template letter can be found here.

For additional information on disaster recovery advocacy, download "Advancing Equity: Strategies, Tactics, and Best Practices for Disaster-Impacted Communities," a comprehensive toolkit for advocates and organizers in disaster-impacted or at-risk communities. This toolkit details successful strategies and provides suggestions for educating policymakers and the public about disaster-related needs and reforms.

These resources were made possible through funding by the Walmart Foundation. The findings, conclusions, and recommendations presented in this toolkit are those of the authors and the National Low Income Housing Coalition alone and do not necessarily reflect the opinions of the Walmart Foundation.

About NLIHC's Disaster Housing Recovery, Research, and Resilience (DHR) Initiative

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. NLIHC works to advance its mission of housing justice to disaster-impacted and at-risk communities via its Disaster Housing Recovery, Research, and Resilience (DHR) initiative.

RECOVERY

Founded in 2017 and led by NLIHC, the DHRC works to ensure that federal disaster recovery efforts reach those most impacted by disasters, including households with the lowest incomes and those who are most marginalized, including people of color, seniors, people with disabilities, people experiencing homelessness, and other individuals. The DHRC provides policy and advocacy support to partner organizations actively responding to the needs of affected populations, monitors federal actions after disasters, and gathers disaster recovery best practices. Advocacy by the DHRC has been instrumental in significant changes to federal disaster recovery programs—increasing access to disaster resources for tens of thousands.

RESEARCH

NLIHC conducts its own research on the impact of disasters on low-income households and seeks to foster research on the topic elsewhere. The NLIHC-led Disaster Housing Recovery Research Consortium is a group of scholars and applied researchers from research institutions and advocacy organizations whose purpose is to achieve data transparency and greater access to high-quality data on disaster assistance and recovery, support research through collaboration and the sharing of data and findings, and communicate research findings.

RESILIENCE

As climate change-influenced disasters become more common and severe, the effort to increase community resilience is an absolute necessity. The lowest-income and most marginalized households are often most at risk due to disasters. The DHRC works to ensure that the mitigation needs of homeowners, renters, and people experiencing homelessness are addressed and that affordable housing needs are included in the mitigation planning process.

GET INVOLVED

Join the DHRC to help ensure a complete and equitable disaster recovery for America's lowest-income and most marginalized disaster survivors.

Register for the DHRC Working Group at: https://bit.ly/3Rm08rb

Become a member of the DHRC at: https://nlihc.quorum.us/campaign/81448/

Learn more about the DHRC at: https://nlihc.org/disaster-housing-recovery-research-resilience

For more information contact Noah Patton, Director of Disaster Housing Recovery and Meghan Mertyris, Disaster Housing Recovery Analyst, at outreach@nlihc.org

SHORT-TERM RECOVERY



Short-Term Recovery

Short-term recovery occurs immediately after the life-threatening danger of the disaster has passed—after search and rescue operations have concluded and community lifelines are restored. Short-term recovery encompasses securing and restoring public health services, emergency housing, rebuilding transportation routes, and other essential services.

While short-term recovery is directed by state and local governments, the assistance programs available for impacted households come from the federal government. For federally declared disasters, the housing element of the short-term recovery phase is primarily led by the Federal Emergency Management Agency (FEMA) and its Individual Assistance Program (IAP). Other sources of federal and state assistance, as well as philanthropic dollars, are also available, but constitute a much smaller portion of the recovery. For renters, the short-term recovery period can be exceptionally stressful, as those who have been evicted or forced to leave damaged homes attempt to navigate a tail-spinning housing market.

While FEMA has several programs, ranging from rental assistance to repair, these programs have historically been difficult to access, particularly for low-income households. For those who can navigate the application system, assistance is often far short of their need. Regardless, FEMA assistance constitutes a significant source of aid for households affected by disasters.

Short-term recovery is often chaotic. Following the disaster, numerous overlapping missions and efforts will be undertaken by various levels of government and nonprofit partners. As a result, it is often a good idea for community-based organizations to stay aware of different advocacy needs in advance of a disaster, making it easier for advocates to ensure that assistance is reaching the most-impacted households.

While short-term recovery is directed by state and local governments, the assistance programs available for impacted households come from the federal government.



Photo Credit: FURIA Inc.

Major Disaster Declaration Approval Request

When a state, territory, or Tribe's ability to respond to a disaster is overwhelmed, the president can issue a major disaster declaration. This allows those localities to access a wide range of federal disaster assistance programs, including those from FEMA. FEMA's IA Program helps with short-term recovery needs in a disaster. Within the IA Program, there are different subprograms meant to address various needs survivors will have during their short-term recovery, including financial assistance and direct services.

On average, it takes several weeks for the president to approve a major disaster declaration. Historically, the president will rarely deny a major disaster declaration request but it has become more common in the current Administration. If a denial happens, the governor or Tribal Chief Executive has 30 days from the denial date to appeal the decision. It is critical that the impacted area advocate to get a major disaster declaration as this is the key to unlocking federal assistance to aid individuals recovering from the disaster.

TALKING POINTS

- State and local officials and nonprofits are currently on the ground providing critical services and doing the best they can to ensure families impacted by the disaster have what they need to recover. But without sufficient federal resources, we know survivors will fall through the cracks. We're calling on the federal government to provide the resources families need to recover.
- Impacted families have been left to deal with the "disaster after the
 disaster": the long-lasting financial, health, and emotional consequences of our broken disaster recovery system. To make sure survivors
 don't fall through the cracks, we need adequate resources. We urge the
 president to approve a major disaster declaration immediately, so families can meet their basic needs and start recovering.
- Federal resources are a necessity to putting us on the path to recovery.
 The faster federal resources begin to flow to our communities, the faster we can begin to recover and rebuild.

- This disaster has left thousands of families displaced. We just want to go home and get whole. Federal resources that can help with temporary housing and home repairs are essential to preventing these families from becoming permanently displaced or, in the worst cases, homeless.
- During disasters, we all want to do what we can to help our fellow community members, and this includes making sure they have access to the resources they need to recover from an incident they had no hand in creating. FEMA provides financial assistance and direct services to eligible survivors affected by a disaster. As families work to pick up the pieces and put their lives back together, we urge the president to get our communities the assistance we need and deserve.



MAJOR DISASTER DECLARATION APPROVAL REQUEST

To President [NAME],

We request you immediately approve a major disaster declaration for the recent [INSERT DISASTER] event that devastated the [INSERT LOCALITY] area on [INSERT WHEN DISASTER HAPPENED]. A presidential disaster declaration for the [INSERT REGION] is necessary so that thousands of impacted individuals can receive critical federal disaster assistance. Currently, numerous impacted residents are struggling to meet their basic needs because of the disaster and urgently need federal disaster assistance.

On [INSERT DATE OF DISASTER], a [INSERT DISASTER] impacted [INSERT LOCALITY] and resulted in [INSERT #] fatalities and multiple other injuries. The [INSERT DISASTER] caused extensive damage to homes, businesses, and places of worship. City officials estimate that the [INSERT DISASTER] caused over [INSERT \$ AMOUNT OF DAMAGE] in damage to the [INSERT REGION]. The devastation has left thousands of residents displaced and in search of resources for food, shelter, and medical needs. [INSERT DETAILS OF ANY SPECIFIC HARD-HIT AREAS.]

State and local officials and nonprofits are currently on the ground providing critical services but need additional federal resources. Residents are in desperate need of Individual Assistance from the Federal Emergency Management Agency (FEMA), which provides financial assistance and direct services to eligible individuals and households affected by a disaster. These federal resources can help with expenses because of an injury caused by the disaster as well as immediate needs such as water, food, first aid, rent, prescriptions, infant formula, breastfeeding equipment, diapers, personal hygiene items, and fuel for transportation. Federal resources can also help with temporary housing and home repairs, low-cost loans to cover damaged property, and other programs to help individuals and business owners recover.

Your action is needed to ensure that residents receive the help they need. Before FEMA can provide Individual Assistance, the affected area must first receive a major disaster declaration from the president. [INSERT STATE] Governor [INSERT NAME] has already requested a major disaster declaration on [INSERT DATE OF REQUEST]. Members of the [INSERT STATE] congressional delegation and local officials have made similar requests.

The timely approval of disaster declarations has precedent after recent disasters:

- After Hurricane Florence devastated parts of North Carolina on September 7, 2018, the <u>White House</u> approved a major disaster declaration on September 15, 2018.
- After Hurricane Harvey struck the Gulf Coast on August 25, 2017, the White House approved a major disaster declaration on August 25, 2017.
- After a tornado and severe storms hit Mississippi starting on January 20, 2017, the White
 House approved a major disaster declaration on January 25, 2017.

The disaster that hit the [INSERT LOCALITY] will leave residents and communities rebuilding for years to come. The faster federal resources begin to flow to these communities, the faster these communities can begin to recover and rebuild. We urge you to immediately approve the [INSERT LOCALITY] major disaster declaration so that affected residents, small business owners, and communities can access the critical resources they need.

Eviction Moratorium and Mortgage Forbearance

Currently, disasters don't automatically trigger any federal eviction moratoriums or mortgage forbearances. While most mortgage companies will allow homeowners a temporary mortgage forbearance if they request one after a disaster, there is not an official law requiring it. There have also been specific disasters, including the COVID-19 pandemic and the Maui wild-fires, where state officials have taken it upon themselves to issue eviction moratoriums and mortgage forbearances. Research during the COVID-19 pandemic demonstrated that these protections are powerful tools to keep community members in their homes and that they helped impacted residents achieve better financial outcomes.

Without mortgage forbearances and eviction moratoriums, the economic impact of the disaster–temporary unemployment, repair costs, and replacing personal property, results in missed payments, massive credit card debt, hits to credit scores, and, in the worst cases, foreclosures and evictions that lead to homelessness.

This is one of the first places where survivors will fall through the cracks as they recover from disaster. While assistance is often available from local, state, and federal resources for those living in damaged housing units, survivors who experience an eviction or a foreclosure due to the economic impacts of the disaster are generally not eligible for assistance. As a result, advocates and organizers should ensure their elected officials are aware of the need to immediately issue eviction moratoriums and mortgage forbearance after disasters.

TALKING POINTS

 Eviction moratoriums and mortgage forbearances provide breathing room for renters and homeowners alike as they recover from the economic consequences of a disaster, like job loss, missing paychecks, and the increased cost in household goods. Without these protections, survivors face missed payments and mounting credit card debt—and ultimately foreclosures, evictions, and homelessness. You can prevent this by acting today.

- An eviction moratorium and mortgage forbearance would ensure that disaster survivors are entitled to a pause on mortgage payments and evictions, sparing them from the financial strain of juggling necessities, the cost of recovery, and housing costs.
- Eviction moratoriums and mortgage forbearances have been used successfully at the federal and state level by both Republicans and Democrats to allow families impacted by disaster the time they need to find their footing after a disaster. We must do the same.
- Not only do evictions and foreclosures further the harm created by this
 disaster, they also slow and worsen our community's recovery; from
 local businesses to the economy as a whole. When survivors don't have
 the tools they need to recover, they have no choice but to leave the
 area, leaving the community, infrastructure, and the economy worse off
 and more vulnerable to future disaster.
- All disaster survivors deserve a safe, accessible, and affordable place
 to live while they recover. We need a lifeline to help us get back on
 our feet—a mortgage forbearance and eviction moratorium—so we can
 begin to rebuild our lives and community.

This is one of the first places where survivors will fall through the cracks as they recover from disaster. While assistance is often available from local, state, and federal resources for those living in damaged housing units, survivors who experience an eviction or a foreclosure due to the economic impacts of the disaster are generally not eligible for assistance.

EVICTION MORATORIUM AND FORECLOSURE FORBEARANCE

To Governor [INSERT NAME],

We urge you to utilize your executive authority to prevent evictions and foreclosures in areas of [INSERT LOCALITY] impacted by [INSERT DISASTER] for [INSERT # OF DAYS] days. This action would prevent the needless displacement of thousands of impacted households—including many of the hardest-hit disaster survivors who will need the greatest amount of assistance to recover from this catastrophic [INSERT DISASTER]. [INSERT STATE] law gives the governor broad powers in times of an emergency, and we urge you to utilize this ability to protect renters and homeowners at risk of losing their home in the aftermath of this disaster.

The use of eviction moratorium and foreclosure forbearance has precedent in related executive actions undertaken after recent disasters. During the COVID-19 pandemic, an eviction moratorium ensured that families with the lowest incomes did not face displacement and homelessness because of pandemic-related economic turmoil. After the 2023 Maui wildfires, the Hawaii governor issued an emergency proclamation banning most evictions for an extended period following the devastation. [INSERT ADDITIONAL EXAMPLES IF YOUR STATE HAS IMPLEMENTED AN EVICTION MORATORIUM OR SIMILAR PROTECTIONS.] [INSERT DETAILS IF EVICTIONS OR FORECLOSURES HAVE ALREADY BEGUN.] We urge you to quickly implement an eviction moratorium and foreclosure forbearance so that families can focus on recovery efforts and not whether or not they will be kicked out of their home.

Disasters disproportionately impact the lowest-income survivors. At the same time, these survivors are least likely to receive the assistance they need to fully recover. One of the top priorities after a disaster must be ensuring all displaced survivors have a safe, accessible, and affordable place to live while they recover. We request that you assist in this endeavor by lawfully invoking your executive power to issue an eviction moratorium and foreclosure forbearance for areas of [INSERT LOCALITY] impacted by [INSERT DISASTER].

Not only do evictions and foreclosures further the harm and suffering created by this disaster, they will slow and worsen the recovery of the impacted areas. Without this requested action, households already being harmed by the affordable housing crisis in the region, including essential workers, will be forced to relocate away from the area. These households will be unlikely to return any time soon given the financial hit they have taken due to the [INSERT DISASTER] and the lack of affordable housing in the area.

Given the amount of harm created by these evictions and foreclosures and the pressing nature of this concern, we request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

TEMPLATE LETTER

Extension of FEMA Assistance Period

The "Stafford Act" (which governs how the US responds to disasters) requires the Federal Emergency Management Agency (FEMA) assistance to end 18 months after the date of the disaster. However, governors or Tribal Chief Executives can request an extension from FEMA for several months. Because we are working in a fundamentally broken disaster recovery system, most survivors are far from being fully recovered 18 months after the disaster. Survivors who are utilizing FEMA services and programs at the 18-month mark are the most vulnerable and likely to fall through the cracks.

Additionally, many disaster survivors will receive a denial letter from FEMA upon submitting their first application. Despite its misleading name, denial letters are not actual denials. It just means the survivor needs to appeal their case and, most likely, clarify some of the information they provided in their first application. The appeals process can take a long time, and FEMA is extremely unclear on whether the 18-month deadline also applies to the appeals process (meaning that you had to successfully appeal your case and receive all your benefits prior to the 18-month deadline).

As a result, it is imperative that governors or Tribal Chief Executives extend FEMA assistance for as long as possible.

TALKING POINTS

- Due to bureaucratic hurdles, disaster survivors have been delayed from accessing lifesaving assistance. Without adequate time to access this assistance, we face higher housing costs, displacement from our communities, and, at worst, homelessness. That's why we're calling on officials to buy us more time to help ensure that disaster survivors can fully recover while remaining in our homes and communities.
- Disaster survivors have worked for months to pick up the pieces and put their lives back together. Now, just as many families are finally starting to see the light at the end of the tunnel, FEMA assistance is set to come to an end. We must extend the FEMA assistance deadline and ensure every disaster survivor has the chance to make it home.

- For months, families impacted by [INSERT DISASTER] have scrapped together recovery assistance, appealed their FEMA cases, and worked with case managers to expedite their recovery. However, all of that is set to come to an abrupt end on [INSERT DATE] when FEMA assistance runs out. And it doesn't end there—an inability to access FEMA assistance also prevents survivors from accessing the state's housing recovery program. Survivors shouldn't be punished for a disaster they had no hand in creating.
- To ensure that every family impacted by this catastrophic disaster can make the best use of critical FEMA resources, they need sufficient time to do so. Otherwise, we risk leaving [INSERT # OF PEOPLE] without any disaster assistance, putting them back at square one and undoing all the investments FEMA has made in the community's recovery. Our families deserve a full and fair recovery that meets their needs, gets them recovered, and ensures they make it home. [INSERT OFFICIAL], we need you to make this happen and extend the FEMA assistance deadline as soon as possible.

Additionally, many disaster survivors will receive a denial letter from FEMA upon submitting their first application.

FEMA ASSISTANCE PERIOD EXTENSION

To [Governor or Tribal Chief Executive NAME],

We ask that you submit a request to the Federal Emergency Management Agency (FEMA) to extend the agency's Individual Assistance period for areas still struggling to recover from [INSERT DISASTER] for [INSERT # OF DAYS]. When [INSERT DISASTER] touched down in [INSERT LOCALITY] communities were left reeling from the wreckage it created in its wake. Causing [INSERT \$ WORTH OF DAMAGE] and destroying [INSERT #] homes and [INSERT #] businesses, families impacted by [INSERT DISASTER] have painstakingly worked to pick up the pieces and put their lives back together.

Since then, [INSERT #] survivors have appealed their FEMA case, [INSERT #] individuals are living in temporary housing solutions, and [INSERT #] are working with FEMA case managers to expedite their recovery. However, just as many families begin to recover, FEMA assistance is set to come to an end. Beginning [INSERT DATE], FEMA will stop accepting appeals, providing financial assistance, and delivering critical direct services to eligible disaster survivors. In short, it would leave [INSERT #] people without any disaster assistance, putting them back at square one and undoing all the investments FEMA has made in the community's recovery.

According to FEMA policy, extensions of a registration period can be granted upon request where it is warranted, including instances where it is "necessary to establish the same registration deadline for subsequently designated contiguous areas; there is a continued volume of registrations; and/or there are significant barriers to registration (i.e., extended loss of electricity)." [INSERT LOCALITY] meets several of these requirements.

[HIGHLIGHT IF THERE WERE AREAS THAT RECEIVED A DISASTER DECLARATION AFTER THE INITIAL DISASTER DECLARATION WAS ISSUED.]

[HIGHLIGHT IF THERE WERE STILL A LARGE NUMBER OF PEOPLE APPLYING FOR DISASTER ASSISTANCE FOR THE FIRST TIME RIGHT UP UNTIL THE DEADLINE. IF SO, HIGHLIGHT HOW MANY DISASTER RECOVERY CENTERS WERE OPEN AND WHERE THEY WERE AS THE DEADLINE APPROACHED.]

Multiple barriers to registration existed during the application period. [HIGHLIGHT INCIDENTS LIKE EXTENDED POWER OUTAGES, LANUAGE ACCESS ISSUES, ETC.]

FEMA assistance extensions have precedent and have been used in disasters of all kinds from across the country to ensure disaster survivors have the tools they need to get a full and fair recovery. Assistance for the 2023 Maui Wildfires was extended not once but multiple times, resulting in an additional months of assistance.

A [INSERT # OF DAYS] extension beyond the [INSERT DATE] deadline would allow survivors time necessary to obtain FEMA resources. Inability to access FEMA not only prevents access directly to those resources but will also bar access to the state's housing recovery program. When survivors are unable to access the resources they need to get home and whole, they are forced to double up with other families, live in unsafe conditions, or become homeless.

To ensure that every family impacted by this catastrophic disaster can make the best use of these critical resources, they need sufficient time to do so. We urge [INSERT TARGET] to extend the period of assistance for [INSERT # OF DAYS] and allow survivors this chance.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

FEMA and Families Experiencing Homelessness in Disaster Recovery

The Federal Emergency Management Agency (FEMA) doesn't provide housing assistance to individuals who were experiencing homelessness before the disaster. FEMA claims this is because that person's "need for housing was not caused by the disaster." In theory, FEMA has created a workaround by referring to folks experiencing homelessness as "residents of non-traditional housing" (tents, huts, lean-tos). If a "resident of non-traditional housing" can get their occupancy verified by a credible source, they can get certain types of assistance, including rental assistance. However, this is nearly impossible to do in practice. Jurisdictions have also come up with creative solutions like assigning addresses to those experiencing homelessness before the disaster so they are able to access assistance.

Individuals experiencing homelessness pre-disaster may be eligible for certain types of Other Needs Assistance (ONA). Some examples include transportation assistance, medical and dental assistance, funeral assistance, and child care assistance—but not housing assistance.

Disasters are also often used as an opportunity to displace individuals with low incomes and those from the most marginalized groups, including those experiencing homelessness. This is particularly an issue in jurisdictions that arrest, ticket, fine, harass, and overall criminalize people just for experiencing homelessness. Governors or Tribal Chief Executives must proactively and intentionally include families experiencing homelessness in their recovery plans, work with FEMA, and insist that they be allowed to access assistance to become more stably housed in the wake of the disaster.

TALKING POINTS

 Though disasters don't discriminate, disaster preparation and recovery systems do. Families experiencing homelessness are among those hardest hit during a disaster, but have the fewest resources and face the longest, steepest path to recovery. We need to help all survivors–families experiencing homelessness, homeowners, and renters–so we can all recover, settle back into our homes, and better prepare for future disasters.

- All disaster survivors—whether they are renters, homeowners, or are
 experiencing homelessness—should be able to access the assistance
 they need to fully recover. But folks experiencing homelessness are
 often outright excluded from these resources and have to overcome
 major hurdles to access the resources they need to recover, especially
 from FEMA. Our communities are stronger when no disaster survivor is
 left to fall through the cracks.
- Families who are experiencing homelessness are on the frontlines of
 worsening weather and rising seas and know all too well that recovering
 from disasters has multiple layers and takes years. [INSERT LOCALITY]
 must make sure those experiencing homelessness are included in our
 recovery, because a full and fair recovery means we all get to go home.
- Families should not be punished for a disaster they didn't ask for and had no hand in creating, including folks experiencing homelessness.
 We're standing together to repair our broken disaster recovery system, get all families the full and fair recovery they deserve, and make clear that where you live doesn't determine what kind of recovery you receive.



Photo Credit: FURIA Inc.

FEMA AND FAMILIES EXPERIENCING HOMELESSNESS IN DISASTER RECOVERY

To [INSERT GOVERNOR OR TRIBAL CHIEF EXECUTIVE NAME] and [INSERT MAYOR],

We urge the [INSERT LOCALITY] to intentionally work with families experiencing homelessness to include them in the [state's or territory's] recovery plans and work with the Federal Emergency Management Agency (FEMA) to ensure these individuals can access assistance, including the Individuals and Households Program (IHP). Overall, we ask [INSERT LOCALITY] to use this recovery as an opportunity to ensure that all disaster survivors—whether they are renters, homeowners, or are experiencing homelessness—are more stably housed and better prepared for the future.

Individuals and families experiencing homelessness are among those most at risk during a disaster. They are often excluded from and face significant barriers to accessing emergency shelters and disaster assistance. Proactively and deliberatively insisting that FEMA ensures their resources are available to those experiencing homelessness is the only way to make certain these survivors will not be left to fall through the cracks.

States and territories across the country have developed innovative ways to do this, including assigning disaster survivors experiencing homelessness addresses to allow them to apply for assistance directly. FEMA can also label those who live in tents, huts, lean-tos, etc. as "residents of non-traditional housing," which, if certified by a case worker, allows these survivors to access certain types of FEMA assistance.

Another major barrier faced by those experiencing homelessness is the overall push to criminalize people for no other crime than not having a home. Jurisdictions that arrest, ticket, fine, harass, and overall criminalize people just for experiencing homelessness, further harm those already suffering from and displaced by the [INSERT DISASTER] and the subsequent damage to the [INSERT LOCALITY'S] housing market. Families should not be punished for a disaster they didn't ask for and had no hand in creating.

Instead, [INSERT LOCALITY] should implement immediate sheltering and safe sleeping options and make public a plan to provide evidence-based services, shelter, and assistance to disaster survivors until safe, accessible, and permanent housing is made available. Additionally, [INSERT LOCALITY] should designate folks experiencing homelessness as eligible for disaster and non-disaster financial assistance and case management services. Specifically, we request that [INSERT STATE OR TER-RITORY] include previously unhoused survivors in FEMA's IHP program. Multiple organizations in our partnership can verify that those impacted had [INSERT LOCALITY] residency at the time of the [INSERT DISASTER], and therefore, that they are among the intended beneficiaries of this program.

Like all disasters, [INSERT DISASTER] disproportionately impacted the lowest-income and most-marginalized households. At the same time, these survivors are least likely to receive the assistance they need to fully recover. One of the top priorities after a disaster must be ensuring all displaced survivors have a safe, accessible, and affordable place to live while they recover. Given the resources, non-congregate shelter units, professional expertise, and funding available, you must provide families experiencing homelessness access to disaster and non-disaster-related assistance and services to assist their recovery.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

Language Access

Disaster survivors with Limited English Proficiency (LEP) and/or audio/ visual disabilities are often among the most at risk during disasters because recovery programs frequently fail to provide adequate translation and interpretation services throughout the process. In some instances, even when translation and interpretation services are provided, they may not be done sufficiently and, in the worst cases, may be outright incorrect.

Language access to federal- or state-funded programs is required under federal civil rights laws and both the Federal Emergency Management Agency (FEMA) and the U.S. Department of Housing and Urban Development (HUD) have historically made commitments to provide language access in their programs. Despite these requirements and commitments, FEMA and HUD have consistently failed to assess the primary languages of impacted communities, provide translations of critical materials, and offices and hotlines have often lacked translators. There is no requirement that announcements appear in languages other than English.

Even if translation and interpretation services are offered, they might not be easily accessed or be offered throughout the entire application process. For instance, FEMA home inspections for deaf individuals have been carried out by employees without knowledge of sign language, despite other aspects of the application process having interpretation available. Additionally, legal aid attorneys working in Disaster Recovery Centers have been asked to provide Spanish language interpretation for FEMA applicants because there was no on-site interpreter.

This issue has become increasingly more complicated with actions taken by the Administration that further disempower individuals with LEP, immigrants, and those living with disabilities. Advocates must hold systems accountable and protect community members during a disaster.

TALKING POINTS

- [INSERT AGENCY] must ensure that every member of our community—
 no matter where they are from, whether they have a disability, or what
 language they speak—can access emergency information, apply for
 assistance, and understand the recovery process in a way that makes
 the most sense to them. We all deserve a recovery that meets us where
 we are and ensures we are able to get back home.
- Despite federal requirements, [INSERT AGENCY] has continuously failed to provide equal access to disaster survivors with Limited English Proficiency and those in need of sign language interpretation when applying for assistance. As a result, individuals with some of the greatest needs following [INSERT DISASTER] have been unable to access the FEMA assistance they are eligible for–leading to displacement and homelessness.
- [INSERT AGENCY] has a responsibility to ensure all disaster survivors, no matter what language they speak or disability they have, can access the information and assistance they need to get home and whole. The resources we need to recover after disasters must be accessible, understandable, and timely.
- Effective public participation means we all get a say. Public meetings
 must include appropriate audio/visual, closed captioning, and translation and interpretation services so all disaster survivors can help shape
 what our recovery looks like. We are the experts and know best what
 our community needs to recover.

Language access to federal- or state-funded programs is required under federal civil rights laws and both the Federal Emergency Management Agency (FEMA) and the U.S. Department of Housing and Urban Development (HUD) have historically made commitments to provide language access in their programs.

LANGUAGE ACCESS

To [FEMA ADMINISTRATOR]:

We are writing to express significant concerns regarding the ability of [INSERT DISASTER] survivors with Limited English Proficiency (LEP) and/or disabilities to access translation and interpretation services throughout the recovery process. Disaster survivors with LEP and/or disabilities have continually experienced an inability to access aid and information from the Federal Emergency Management Agency (FEMA) in the aftermath of major disasters. Despite public outcry after past disasters, these same failures have resurfaced again. FEMA must act immediately to ensure that all disaster survivors receive the assistance for which they are eligible.

FEMA is required to follow federal civil rights law when providing assistance following a disaster. These laws apply to all aspects of federal disaster response. Title VI of the "Civil Rights Act of 1964," Section 504 of the "Rehabilitation Act of 1973," and Section 508 of the "Rehabilitation Act" all require FEMA to provide equal access to services and prohibits discrimination on the basis of race, color, or national origin when conducting any assistance program. In addition, Section 308 of the "Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988" requires that when FEMA is authorized to provide assistance:

"[The] distribution of supplies, the processing of applications, and other relief and assistance activities shall be accomplished in an equitable and impartial manner, without discrimination on the grounds of race, color, religion, nationality, sex, age, disability, English proficiency, or economic status."

Despite these requirements, FEMA has continuously failed to provide equal access to disaster survivors with LEP and/or a disability when applying for assistance, including during Hurricane Maria, Hurricane Harvey, and other more recent disasters. As a result, individuals with some of the greatest needs following disasters have been unable to access the FEMA assistance for which they are eligible–leading to displacement, and in the worst cases, homelessness. These same issues have resurfaced following [INSERT DISASTER].

FEMA's call center waiting time for [INSERT LANGUAGE] speaking applicants averaged [INSERT TIME] during the peak application period and remained unreasonably lengthy. Applicants have reported that officials either hung up or ignored phone calls in [INSERT LANGUAGE]. When available, translated versions of FEMA documents are often poorly done and lack accurate information. Workers employed by FEMA to [TYPE OF FEMA WORKER] were not fluent in [INSERT LANGUAGE] during [FEMA ACTIVITY].

The responsibility to ensure all disaster survivors can access information and assistance relies primarily on FEMA. As established in the FEMA policy: "applicants with LEP are entitled to communicate with FEMA and receive information from FEMA in a language other than English." While nonprofits and legal aid attorneys can and do provide assistance, FEMA has a legal obligation to ensure its programs are accessible.

By implementing these reforms immediately, FEMA can move towards fulfilling its obligations under federal civil rights law and allow all disaster survivors access to the assistance for which they are eligible. Again, we urge FEMA to take these actions immediately.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

FEMA Rental Assistance

After a disaster occurs, the Federal Emergency Management Agency (FEMA) can provide an initial amount of housing assistance for those displaced from their homes by a disaster, as well as up to 18 months of rental assistance for people who remain displaced, through their Continued Temporary Rental Assistance Program. After individuals affected by a disaster receive their first lump sum of recovery money from FEMA, including initial rental assistance, they should be given an application to re-apply for rental assistance should it be needed. Along with the actual application form, you also must provide extensive supporting documentation on your post-disaster living situation.

Many survivors don't know that this assistance is available because FEMA application questions can be oddly worded. For instance, the FEMA application asks survivors, "are you willing to relocate?" Most survivors interpret this question to mean you permanently want to relocate and leave your home. However, the question is asking whether monetary assistance to stay in a hotel or apartment temporarily is needed due to home damage, loss of power, etc.

Additionally, it is a huge burden for survivors to produce substantial documentation on top of navigating the rebuilding of their home or finding a new apartment, applying to a myriad of bureaucratic assistance programs, working to meet basic financial needs, etc. Paperwork on pre-disaster living situations may have also been destroyed during the disaster or difficult to access electronically when the power is down following a disaster.

Organizers and advocates should conduct thorough community outreach to raise awareness of this resource and encourage FEMA to do the same.

TALKING POINTS

 Many of us are stuck paying rent on top of a mortgage on an unlivable house, at risk of losing our homes to foreclosure, getting evicted, or risking homelessness. With soaring rent prices, we need every resource we can get to help us stay afloat until we can fully recover from [INSERT DISASTER]. FEMA rental assistance is this lifeline, and we must ensure that every disaster survivor has a chance to get it.

- When disaster survivors don't have access to safe, affordable homes, many are forced to return to unsafe 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 foreclosure or eviction. We're calling on FEMA to step up and make rental assistance available to all eligible survivors!
- In the aftermath of [INSERT DISASTER], our communities were left reeling from the destruction caused to our homes and communities, but also every aspect of our lives. As we work to recover, we need a safe, temporary place to live where we can reconnect with family and community. FEMA rental assistance is critical to making this a reality.
- When disasters strike, they hurt us all and hit those with the lowest incomes and renters, who often have the fewest resources to recover, particularly hard. Despite this, our disaster recovery system frequently leaves these survivors behind without the resources they need to recover. We need FEMA rental assistance to fill this gap.



FEMA RENTAL ASSISTANCE

To Administrator [INSERT NAME],

We are writing to express significant concerns regarding the implementation of the Federal Emergency Management Agency (FEMA) rental assistance following [INSERT DISASTER]. The large number of bureaucratic obstacles that disaster survivors are required to navigate to access this form of assistance, and the lack of information provided to disaster survivors on how to do so, prevents survivors from receiving the support they need to fully recover. This puts them in danger of displacement and, in the worst cases, homelessness. FEMA must act immediately to ensure that all eligible disaster survivors receive the assistance for which they are eligible.

Upon successful application, FEMA's Individual and Households Program (IHP) provides assistance to find secure temporary housing for two months if families or individuals are displaced from their primary residence as a result of a presidentially-declared disaster like [INSERT DISASTER]. For survivors that still require temporary replacement housing beyond that initial period, FEMA offers Continued Temporary Rental Assistance throughout the period of assistance. This aid is offered outside of the maximum cap FEMA places on assistance to impacted households.

Despite this program's existence, [INSERT #] of families who desperately need this aid haven't been able to access it. The duplicative nature of the application processes also serves to lengthen the amount of time it takes to get assistance to those in need. FEMA's application process is confusing, lengthy, and burdensome. When applying for rental assistance, disaster survivors will have already been required to submit several applications to federal agencies, along with multiple layers of personal identification, proof of ownership and residency, citizenship, insurance reporting, and more.

This confusing and time-consuming process can result in lengthy delays in getting financial assistance from FEMA to assist in accessing temporary housing. Any error in completing an application will result in a denial, requiring an appeal that typically takes several months to complete. As a result, the consequence for applying for assistance with an application error that results in denial could be more than three months after the initial date of submission.

Despite the clear need, FEMA housing programs neglect the housing needs of disaster survivors and exacerbate housing insecurity. Without the affordable and accessible homes survivors need, many 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 foreclosure or eviction. To ensure that all impacted households can fully recover, FEMA must move to immediately make rental assistance available to all eligible survivors.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

Tracking Next Steps in Implementation

As advocates and organizers who have been doing this work know, passing a new law or winning an administrative reform is just the beginning of ensuring our communities receive the benefits of our collective efforts. The next step requires monitoring the implementation of the reform and holding the system accountable in places where improvements aren't fully coming to fruition or are outright not taking place at all.

In FEMA's case specifically, there can be a disconnect between FEMA's national headquarters and FEMA's regional offices that can delay or prevent reforms from spreading. This means that just because a change is made by FEMA headquarters at the national level, it doesn't mean it will necessarily be carried out correctly on the ground.

An effective way to monitor the process of implementation is to pitch your organization as a resource for the elected and/or administrative officials responsible for implementing the reform. Afterall, disaster survivors who are the intended beneficiaries of these new changes will be best positioned to understand what's working, where things are falling short, and how implementation improvements can be made. This can be a beneficial partnership as the official will have to do the work of executing the reforms and advocates and organizers will be monitoring the process.

Unfortunately, most disaster recovery programs and systems don't have built-in, automatic avenues for advocates and organizers to provide this feedback. Even in instances when they do, the opportunities for input may be inaccessible and extractive. For instance, meetings may be held in locations or times that make it difficult for community members to attend. This makes it even more important that organizers and advocates work to develop these partnerships and systems early on to make the most of the improvements they have fought so hard to win.

TALKING POINTS

- We thank [INSERT TARGET] for listening to disaster survivors and [INSERT CHANGE/ACTION]. We know that to achieve a disaster recovery system that protects everyone, those facing the most significant challenges before and after a disaster must be directly involved and empowered to make decisions about how their community recovers. We look forward to working with [INSERT TARGET] to make sure this happens!
- We are so excited to see [INSERT CHANGE]! This change proves once again that disaster survivors must be at the center of reform efforts. Their voices should be uplifted, their immediate needs addressed, and their lived experience and local knowledge used to drive strategy and tactics when pursuing disaster recovery reform. We look forward to continuing to partner with [INSERT TARGET] to ensure these reforms are implemented smoothly!
- What a huge win! Now, it's time to work together with [INSERT TARGET] to make sure these changes are implemented on the ground. Disaster survivors are experts on disaster recovery and resilience. We are smart, autonomous, know what we need, and know our community best. We look forward to using that know-how to assist [INSERT TARGET] as they work to make these changes a reality!



TRACKING NEXT STEPS IN IMPLEMENTATION

To Administrator [INSERT NAME],

On behalf of [INSERT YOUR ORGANIZATION], congratulations and thanks to you and your team on the recent [INSERT IMPROVMENT]. We will submit comments on the [INSERT IMPROVEMENT] and are encouraging our partners to do the same. I write to offer our assistance in the implementation of this new reform, and to request regular meetings with you or your staff to identify any incongruities our members on the ground identify and collaboratively find remedies to any potential issues during the implementation process.

[INSERT A BRIEF SUMMARY OF CHANGES AND THEIR IMPACT.]

We understand that many of these improvements impact fundamental aspects of how the [INSERT IMPROVEMENT] is operated. As a result, implementation monitoring and retraining of FEMA staff and its partners in state, local, territorial, and Tribal governments will be critically needed. We would be glad to assist you in this endeavor.

[INSERT YOUR ORGANIZATION] includes more than [INSERT #] [INSERT LOCAL, STATE, AND NATIONAL] organizations, including many organizations working directly with disaster-impacted communities and with first-hand experience recovering after disasters. Together, we work to ensure that federal disaster recovery efforts reach all impacted households, including those with the lowest incomes and those who are most marginalized and underserved.

As a network of [INSERT DESCRIPTION OF YOUR NETWORK], the [INSERT YOUR OGANIZATION] will support and collaborate with FEMA in the implementation of these new changes during disaster relief and recovery. Many of our partner organizations regularly interact with and assist some of the lowest income and historically marginalized and underserved disaster survivors most served by these rule changes. The agency's long-standing partnerships with a variety of Voluntary Organizations Active in Disaster (VOADs) and Community Organizations Active in Disaster (COADs) across the country demonstrate that collaboration between nonprofit organizations and FEMA can be mutually beneficial.

Again, we thank you for these reforms and would appreciate an opportunity to meet with you to discuss opportunities to assist in their implementation. Please feel free to reach out directly at [INSERT YOUR EMAIL] or to [INSERT ANOTHER CONTACT] at [INSERT OTHER CONTACT'S EMAIL].

TEMPLATE LETTER

LONG-TERM RECOVERY



LONG-TERM RECOVERY

Long-term recovery can last for months, years, or even decades after a disaster occurs. The fact that we are recovering in a fundamentally broken disaster recovery system only lengthens the process. Depending on the impact of the disaster, activities in long-term recovery can be the reconstruction of damaged or destroyed homes, repairing road networks, or the complete redevelopment of housing stock and economic activity within impacted areas.

Regarding housing, long-term recovery often involves the creation of new rental housing to replace damaged units, programs that assist impacted families in finding permanent places to live, and programs that repair homes severely damaged in the disaster and require more funding than provided by FEMA.

The only federal program to assist in long-term recovery is the Community Development Block Grant - Disaster Recovery Program (CDBG-DR), which is facilitated by the Department of Housing and Urban Development (HUD). CDBG-DR funds are administered by HUD, but the programs themselves are executed by state and local governments. The funds can be used for a wide variety of purposes and can be combined with other community development and affordable housing sources to facilitate long-term recovery. It is important to note that not every disaster receives CDBG-DR funding in a timely fashion, or at all, as the program isn't permanently authorized.

The only federal program to assist in long-term recovery is the Community Development Block Grant – Disaster Recovery Program (CDBG-DR), which is facilitated by the Department of Housing and Urban Development (HUD).



Request for Long-Term Recovery Funding

The Federal Emergency Management Agency (FEMA) programs are designed to quickly assist disaster survivors as they work to repair or replace what was destroyed by a disaster. With these programs ending around 18 months after a disaster (unless extended), FEMA will be moving out of a disaster-impacted community before a full recovery has been made. FEMA assistance is not designed to address the broader impacts of disasters such as survivors being forced to relocate, changes in the amount of available housing, and the economic impacts of disasters that require the construction of new buildings, services, job training and employment assistance, or infrastructure.

The long-term, flexible Community Development Block Grant Disaster Recovery (CDBG-DR) program focuses on the needs of those whose recovery was incomplete with previous resources, as well as a disaster's broader housing, economic, and infrastructure-related impacts that have been unaddressed by short-term recovery programs administered by FEMA and other disaster responders. CDBG-DR can address these broader, regional, impacts.

However, the CDBG-DR program is not permanently authorized and therefore only exists when Congress passes funds for long-term recovery. They typically do this periodically, approving a certain amount of money for all disasters since the previous approval of funding. HUD will then examine the unmet need in each disaster-impacted area and distribute the funds to state and local governments for use. Additional information on CDBG-DR is available from NLIHC here.

At times, it has been difficult for Congress to approve timely long-term recovery funds. As a result, it is important that organizations in disaster impacted areas and their allies press Congress to approve these funds. Typically, members of Congress from disaster-impacted states and regions, along with the governor or Tribal Chief Executive, will strongly push for these funds. Organizations are encouraged to coordinate efforts to get long-term recovery funds to disaster-impacted areas.

TALKING POINTS

- Even though we are [# OF MONTHS] after [DISASTER], many of us are still
 struggling to recover because the resources we needed to do so weren't
 enough- or weren't even there in the first place. Now, with even that little
 assistance ending, many of us are being sent right back to square one. We
 need resources to fill the gap, keep us safely sheltered, and finally help us
 get back home for good.
- In [LOCATION], housing continues to become more and more scarce, and
 rents continue to rise higher and higher because of [DISASTER]. Without
 additional housing assistance, we'll be forced to leave [COMMUNITY]
 or risk homelessness. Studies show that HUD-administered long-term
 recovery funds lead to lower rents and fewer evictions. We're calling on
 Congress to quickly approve long-term recovery funds for our area.
- As we enter year [INSERT #] of [INSERT DISASTER], survivors have faced their fair share of challenges, from navigating program bureaucracy to scraping together whatever we can to make ends meet. We need [INSERT TARGET] to help us clear the final hurdle and get long-term recovery funding so we can go home and stay home.

The long-term, flexible Community Development Block Grant Disaster Recovery (CDBG-DR) program focuses on the needs of those whose recovery was incomplete with previous resources, as well as a disaster's broader housing, economic, and infrastructure-related impacts that have been unaddressed by short-term recovery programs administered by FEMA and other disaster responders.

REQUEST FOR LONG-TERM RECOVERY FUNDING

To [CONGRESSIONAL LEADERSHIP]

As we continue to recover from [DISASTER], which caused catastrophic impacts in [STATE OR REGION] on [DATE OF DISASTER], we write to urge you to pass federal long-term disaster recovery funds to meet our ongoing needs and allow our community to fully recover. Specifically, we request significant amounts of Community Development Block Grant - Disaster Recovery (CDBG-DR) funding. We ask that you move quickly to ensure that impacted communities can access these critically needed housing, infrastructure, and economic development funds to match the impact of the disaster and ensure that our community will be able to withstand disasters in the future.

HUD's CDBG-DR program provides flexible grants to help states and localities recover from disasters and rebuild affordable housing and other infrastructure. It is the only source for long-term recovery funds after major disasters, but because the program has not been permanently authorized, these important funds are often slow to reach disaster survivors. By approving CDBG-DR funding for disasters in [YEAR OF THE DISASTER], Congress can ensure these funds are ready and available for ongoing disaster recovery efforts and disasters occurring later in the calendar year.

As a result of the disaster [USE THIS SECTION TO DESCRIBE THE IMPACT OF THE DISASTER, TRY TO INCLUDE AS MUCH INFORMATION AS POSSIBLE ABOUT FATALITIES, INJURIES, AND IMPACTS TO HOUSING AND FINANCES FOR FAMILIES]

In addition to the cost of living and homes, the disaster also impacted the infrastructure we need to survive. [USE THIS SECTION TO TALK ABOUT INFRASTRUCTURE IMPACTS OF THE DISASTER.]

While FEMA and Small Business Administration disaster loans were available in our communities following the disaster, the funds were not designed to tackle the long-term impact of disasters and are insufficient to meet disaster survivors' full recovery needs. While this assistance helped many in our community survive the days and weeks following [DISASTER], the end of this assistance on [DATE FEMA ENDING ASSISTANCE; HAVE/WILL] force[d] many impacted families to start their recovery from square one.

We are in desperate need of additional assistance to help repair and replace the [# OF HOMES] homes damaged by [DISASTER] and allow those impacted families displaced to other communities the ability to return home. In addition, without the infrastructure repairs and replacement that would be possible with CDBG-DR funds, our community would be at severe risk to future disasters, costing us even more in lives, homes, and finances.

As a result, we request that Congress move quickly to approve long-term funding via HUD's CDBG-DR program to ensure that we can fully recover from [DISASTER]. We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

Pushing Back on Long-Term Funding Delays

In addition to delays created due to failure to approve long-term recovery funds at the Congressional level, there are multiple steps the U.S. Department of Housing and Urban Development (HUD), state and local governments must take before long-term recovery funds reach the communities on the ground. Because the Community Development Block Grant - Disaster Recovery (CDBG-DR) program is not permanently authorized—it exists only when money is approved for it—HUD must re-create the program from scratch each time there are new funds available. In addition, a state or local government receiving funds must create an Action Plan describing how they will use the funds, let the public comment on the plan, and get it approved by HUD, who will then sign grant agreements with the state or locality. All these steps can create delays or confusion around where the funds are and how long it will take them to reach disaster survivors.

While these delays often happen without an ulterior motive due to the program's lack of permanent authorization, during past administrations, this process was used to slow down the flow of disaster assistance to areas that refused to meet certain demands placed by the federal government upon their state and local governments. Most notably, there was a lengthy delay in funds reaching Puerto Rico after Hurricane Maria and the deadly 2020 earthquakes due to the refusal of Puerto Rico to make changes to their laws benefiting off-island investors. Advocates in Puerto Rico and in the continental United States worked together to convince Congress of the need to get these important funds to disaster survivors and to encourage implementation at the federal level. While the effort was successful and allowed for long-term recovery to begin, the delaying tactics prolonged the disaster survivor suffering and slowed the island's recovery for a significant period.

Jurisdictions should be aware of this 2020 scenario in Puerto Rico and understand that this scenario can happen again. This section provides talking points and letter templates to support disaster survivors in pushing back against delays. The language should also be useful for long-term recovery efforts that are suffering from other types of delays caused by capacity or other issues.

TALKING POINTS

- For [# OF YEARS AFTER THE DISASTER], we have patiently waited for critical aid to finally reach us. While Congress approved funds to assist in our recovery, [INSERT TARGET] has been stalling, playing games with our livelihoods, all while we continue to face daily challenges recovering and continue to face displacement or, in the worst cases, homelessness. Congress must hold [INSERT TARGET] responsible and get the funds to survivors of [INSERT DISASTER] immediately.
- We thank Congress for their efforts in approving long-term disaster recovery funds for the survivors of [DISASTER]. Now we ask Congress to finish the job and ensure these funds reach families impacted by the disaster. We request that Congress act now to hold [HUD/ANOTHER FEDERAL AGENCY, ETC.] accountable and ensure that these badly needed funds move quickly so we can all get the full and fair recovery we deserve.
- These outrageous delays are putting the lives of disaster survivors at risk. By deciding to play politics instead of assisting our community, families remain living in substandard housing, infrastructure remains in disrepair, and families who have lived in our area for generations have been displaced. We call for the removal of these restrictions and the end of delays—we must get these funds to those who need them the most.

Jurisdictions should be aware of this 2020 scenario in Puerto Rico and understand that this scenario can happen again.

PUSHING BACK ON LONG-TERM FUNDING DELAYS

To HUD Secretary [NAME]:

We write to urge the U.S. Department of Housing and Urban Development (HUD) to take immediate action to release [INSERT \$ AMOUNT] in congressionally-approved disaster recovery funding to help communities devastated by [DISASTER] to recover and better prepare for future disasters.

It has now been [# OF MONTHS] since Congress approved more than [INSERT \$ AMOUNT] dollars in Community Development Block Grant - Disaster Recovery (CDBG-DR) funds. Congress directed HUD to release the Federal Register Notice guiding the implementation of these funds within [# OF DAYS]. Since then, no such action has been taken, leaving [INSERT DISASTER] survivors without the necessary resources to recover and unnecessarily putting American lives at risk.

In [STATE OR LOCALITY], many of the most vulnerable survivors are still living in areas without the critical infrastructure necessary to withstand another disaster. More than [# OF DAMAGED HOMES] need repairs. Nearly [# IF IMPACTED FAMILIES] sleep in damaged homes that have yet to be repaired or replaced.

[ADD ADDITIONAL INFORMATION ABOUT DISASTER IMPACTS AND HOW FEMA FUNDS WERE INSUFFICIENT TO MEET NEEDS]. FEMA programs are designed to quickly assist disaster survivors as they work to repair or replace what was destroyed by a disaster. They cannot be used to address further effects of disasters such as dramatic population shifts, changes in housing stock, and broader economic impacts of disasters that require the construction of new buildings, services, job training and employment assistance, or infrastructure. CDBG-DR can address these broader regional impacts.

Withholding these funds means that grantees including [OTHER STATES THAT WILL BE RECEIVING FUNDS FROM THE ALLOCATION] cannot even begin planning for how they will invest these funds to help their communities recover and become more resilient to future natural disasters.

In addition, HUD must quickly remove other federal barriers to recovery in [STATE OR LOCALITY]. [USE THIS SECTION TO DESCRIBE WHERE THE FUNDS ARE IN THE CDBG-DR PROCESS AND WHAT BARRIERS MUST BE REMOVED TO GET THE FUNDS MOVING AGAIN.]

Rebuilding and mitigation resources are critically needed to protect the lowest-income survivors when the next disaster hits. HUD must immediately release billions of dollars in aid approved by Congress to help [STATE OR LOCALITY] fully recover and rebuild strong and resilient communities.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

Long-Term Recovery Eligibility Issues

A significant benefit to the U.S. Department of Housing and Urban Development (HUD)-administered long-term recovery Community Development Block Grant Disaster Recovery (CDBG-DR) program is its flexibility. This is by design: disasters look different in different places across the country and therefore require unique solutions. HUD has some overarching requirements for the funds, including where funds can be spent and the level of benefits low- and moderate-income people receive (these requirements can be viewed in HUD's recently published Universal Notice for CDBG-DR grantees). However, specifics related to eligibility are left to state or local governments.

While a state or local government's CDBG-DR Action Plan details the type of programs funded and what will be accomplished, specific eligibility requirements are often laid out in a separate policy document. Changing an Action Plan requires a state to undergo a formal amendment process with public hearings and HUD approval, but changing a program policy requires no such process. As a result, community-based organizations should be aware that program eligibility rules can be quickly changed to give eligibility to the greatest number of survivors.

In the past, the source of particularly tough eligibility requirements placed on CDBG-DR-funded assistance programs has created confusion for community-based organizations and advocates. Often, a state or local government may claim that such rules are required by HUD when, in fact, no such requirement exists. For instance, after Hurricane Florence, North Carolina initially required homeowners applying for a repair and replacement program to have complete title documentation for their home, something unavailable to homeowners who own their homes via heirs property—where the initial owner of the home, usually a parent, passed away without a will deeding the home to their children. The state initially claimed that HUD required full title documentation despite the agency reiterating that the program could use multiple proof of ownership and that the decision on how stringent to be was made at the state level.

TALKING POINTS

- [INSERT DISASTER] survivors have been trapped in limbo waiting for aid as they work little by little to repair their homes and fight to stay in their communities. Now, [INSERT STATE OR LOCAL DEPT] is pulling the rug out from under them with program requirements that make it nearly impossible for [ESTIMATED # OF FAMILIES] families to access the assistance they were promised and counting on. We need [INSERT STATE OR LOCAL DEPT] to remedy this immediately.
- According to the rules created by [STATE OR LOCAL DEPARTMENT],
 [ESTIMATED #] of us now can't access the aid we've been told time
 and time again we could count on to get our families home. [INSERT
 LOCALITY] can't suddenly change the rules of the game in the final
 quarter—especially not without any input from our community. We're
 calling on [INSERT TARGET] to play fair and fix the rules of the program.
- For [INSERT YEARS SINCE DISASTER] years we have waited, hoped, applied for aid, worked with case managers, fought with insurance, and then waited some more to finally receive the disaster assistance we were promised. Now, [INSERT TARGET], we're finding out that after all this time we can't even count on that as the rules of the program rule many of us out. We need you to act and ensure we can fully recover.



LONG-TERM RECOVERY ELIGIBILITY ISSUES

To [SECRETARY OR PROGRAM DIRECTOR NAME]:

We write to urge [STATE OR LOCAL DEPARTMENT] to take immediate steps to address deficiencies in [PROGRAM NAME] funded via U.S. Department of Housing and Urban Development (HUD) long-term disaster recovery dollars. Although HUD has approved the implementation of the program based on [STATE OR LOCAL GOVERNMENT]'s Action Plan, the program policies regarding eligibility are separate. They exclude hundreds of families that have been impacted by [DISASTER] and should be eligible for this critical assistance. We ask that [STATE OR LOCAL DEPARTMENT] work to correct this issue and ensure that every impacted family is able to fully recover.

After [DISASTER], nearly [# of HOMES DAMAGED] homes were damaged, with [# of FEMA APPLICATIONS] families submitting applications for assistance from FEMA. While this assistance was welcome, it was not enough for every family to recover. As a result, HUD allocated additional long-term recovery funds to our area in order to address this unmet need. Now, because of the policies of [PROGRAM], those families are again being left behind. As a result, they will continue to experience economic burdens, displacement, and, in the worst cases, homelessness.

Specifically, the program requirement that [USE THIS SECTION TO DESCRIBE WHAT POLICIES ARE PREVENTING FAMILIES FROM ACCESSING ASSISTANCE].

These HUD funds, the only long-term recovery funds available from the federal government, are designed to ensure that impacted households can meet the needs left unmet by earlier assistance programs. For many, this will be the only chance they have to fully repair their homes and remain in their beloved community. If these program requirements are not changed, our community will be irrevocably changed, worsening the impact that [DISASTER] has had on our area and leaving us even more unprepared for future disasters.

We request that [STATE OR LOCAL DEPARTMENT] make the following changes to its programs:

[LIST OUT DESIRED CHANGES]

These changes will likely not require any changes to the Action Plan submitted and approved by HUD. Instead, these changes to program policies can be made by [STATE OR LOCAL DEPARTMENT] to quickly allow access to these critically needed funds. We request that these changes be made immediately to allow time for impacted families to compile their supporting documentation and apply for these funds.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

TEMPLATE LETTER

Community Advisory Committees and Requests to Partners

In early 2025, U.S. Department of Housing and Urban Development (HUD) published a "<u>Universal Notice</u>" outlining requirements and recommendations for their long-term disaster recovery program, the Community Development Block Grant - Disaster Recovery (CDBG-DR) program. The notice included recommendations that states and territories create and facilitate a Citizen Advisory Committee (CAC) as they carry out their CDBG-DR programs to encourage input from disaster survivors into program policies.

According to HUD's recommendation, a "citizen advisory group is a body composed of individuals from a community who volunteer or are appointed to provide input, advice, and recommendations on various issues and policies affecting their community. These groups typically serve as a bridge between the general public and decision-makers, offering insights, perspectives, and expertise to help inform and shape decisions that impact the community's well-being and development".

Because state and local governments commonly rely on outside contractors to draft CDBG-DR Action Plans, the ability of the public to formally offer advice outside of the required public hearings and comment period is very limited. Long-term recovery programs are large, generously funded efforts that require continuous public engagement. A CAC offers community organizations the ability to influence program policy to ensure that procedures are being followed and that the assistance is accessible and equitably distributed.

The effectiveness and creation of CACs are not just up to advocates for disaster-impacted communities. It requires significant support from the agency administering the long-term recovery funds. The agency will need to offer staffing and be willing to act upon CAC recommendations. By holding themselves out as a resource to assist in developing and sustaining interest and activity of a CAC, advocates can assure the state or local agency running long-term recovery programs that the effort will be worth the resources.

CACs have been required previously for several appropriations of mitigation funds. The most active of these was the CAC created by advocates in Puerto Rico in conjunction with the Puerto Rico Department of Housing. National Low Income Housing Coalition and the Hispanic Federation have compiled resources on addressing long-term disaster housing recover, including lessons learned after creating the CAC in Puerto Rico. Those resources can be found here.

TALKING POINTS

- Disaster survivors must have a voice in their community's recovery to ensure that they don't fall through the broken cracks of the disaster recovery system.
- The need for public input and transparency doesn't just exist during public hearings and comment periods, it is a 24/7 endeavor. Given the importance of these long-term disaster recovery funds to our community, [STATE OR LOCAL DEPARTMENT] should act upon HUD's recommendation and convene a Citizen Advisory Council of community groups based in the most impacted areas of [DISASTER IMPACTED AREA].
- After the chaos of [DISASTER], these long-term recovery funds represent the hope of a full recovery for so many impacted families. Given the stakes, we need to work together to ensure as many of these families have access to this assistance as possible. Convening a Citizen Advisory Council will create an avenue for community-based groups to help spread the word to community members regarding critical programs.



COMMUNITY ADVISORY COMMITTEES AND REQUESTS TO PARTNERS

To [STATE OR LOCAL OFFICIAL]:

We are writing to urge you to formalize a Citizen Advisory Committee (CAC) to assist in the implementation, and provide feedback for, the HUD funded long-term disaster recovery program administered by your agency. Creating a CAC will allow for greater citizen participation in the disaster recovery process and is recommended by HUD for use with this program. We request that an initial group of community-based organizations be selected based on nominations from communities impacted by [DISASTER], and that an operational guide be produced to govern the ongoing work of this CAC and guidance be created to assist in ensuring as many impacted families as possible receive this assistance. We would like to offer our assistance in setting up this initial phase of the CAC.

As organizations based in [DISASTER IMPACTED AREA], we know firsthand the impacts of [DISASTER]. [USE THIS SPACE TO ADD 2-3 SENTENCES ABOUT THE IMPACT OF THE DISASTER ON THE COMMUNITY]. These impacts make the [AMOUNT OF FUNDS] provided to [STATE OR LOCAL GOVERNMENT] by HUD in long-term recovery funds even more critical.

Public participation and transparency are necessary aspects of disaster recovery; without them, disaster recovery can easily leave impacted families behind. Decisions made about eligibility or areas of emphasis within programs will be easier to make if the community itself is providing ongoing feedback. By adopting the guidance created and proposed by board members, this ongoing feedback can begin. [ORGANIZATION OR ORGANIZATIONS IS/ARE] willing to assist [STATE OR LOCAL DEPARTMENT] in setting up this initial phase of the CAC. We are well positioned to assist in bringing attention to the CAC and creating a solid foundation for its operation throughout the long-term recovery process.

The creation of a formal CAC will streamline the collection of public input and make [STATE OR REGION] more resilient to future disasters. State, local, and territorial governments implementing long-term recovery funding often lack the capacity to collect and integrate meaningful public opinion on recovery needs before and after disasters. [STATE OR LOCAL DEPARTMENT] can collect public input without sacrificing this capacity by providing a core group of community-involved nonprofit partners with a formalized role via the CAC model. Having this structure in place will ensure the agency can quickly collect and reflect public opinion before and after future disasters.

Again, we ask that you begin the creation of a CAC board, along with supporting policies and guidance documents. We are more than willing to directly assist you in accomplishing this task. Doing so will ensure [STATE OR REGION] can effectively recover from [DISASTER] and make our effort a national model for the disbursement of long-term recovery funding in the future.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].



RESILIENCE AND MITIGATION

Broadly, both resilience and mitigation deal with "hazards"—which are threats to lives and property, such as fire, flooding, wind, earthquakes, and others.

The definition of resilience varies, and there is no single definition that is universally accepted. Broadly, resilience refers to a community, organization, or country's ability to resist or survive a hazard while continuing to function.

The DHR's "resilience" work focuses on ensuring that communities and households with low incomes have the capacity and expertise necessary to perform activities that fall within mitigation and adaptation, which in turn lowers the risk of their communities to hazards.

The concept of "mitigation" involves specific actions taken to directly reduce the impact of specific hazards on systems and the built environment. In contrast, the term "resilience" is a broader concept—one that deals with how our communities adapt and mitigate the impact of hazards.

Resilience and mitigation are funded through different state and federal programs, offered by FEMA, HUD, and other agencies. Based on the proactive nature of resilience and mitigation—best done ahead of a disaster—community-based organizations should remain aware of opportunities to fund and complete these types of projects.

Resilience and mitigation are funded through different state and federal programs, offered by FEMA, HUD, and other agencies.



Photo credit: Stephania Tarrant, Louisiana Just Recovery Network

Partnering with Local Emergency Managers

One of the key things that community-based organizations can do before a disaster strikes is to build up relationships with emergency management officials in their local area. Information and access are often the most important currency during the disaster response and recovery process. Being "in the room" can often be more useful to advocacy efforts than a sixmonth campaign. However, in the immediate aftermath of a disaster and during disaster recovery, it can be incredibly difficult to build the necessary relationships with emergency management and disaster recovery professionals to gain such access. As a result, building these relationships before a disaster is crucial.

Emergency managers have a difficult job. At the local level, their offices often have low budgets and are understaffed. They struggle to convince policymakers to invest in robust disaster response and recovery systems. In many rural areas of the country, a county may have just one emergency manager to lead disaster preparedness activities. At the state level, emergency management departments may have larger staff sizes, but they are often dependent on federal grants to pay them. With the current Administration threatening to cancel many of these grants and many state governments lacking interest or the funds necessary to make up the difference, these state-level offices are feeling a funding crunch.

The lack of capacity within some local emergency management departments may lead to these departments being combined with local and county police departments. Organizations should use their best judgement regarding outreach should this be the case.

Regardless, organizations should work to build relationships with individuals working in emergency management departments and offices—whether this is the chief or department lead, or the person in charge of distributing assistance to individuals and households. Recent publications throughout the emergency management community have focused on community engagement, but many professionals may not know how to accomplish this task. Community-based organizations should present themselves as solutions to this problem.

In addition, many state or local emergency management agencies are concerned with their legal liability for failing to equitably distribute assistance. Cautious emergency managers may accept offers made by community-based organizations to work with state and local emergency management agencies to lessen the risk of a lawsuit.

TALKING POINTS

- As an organization working in [GEOGRAPHIC AREA], we know the importance of ensuring our community is actively preparing for future disasters. By working together with [LOCAL OR STATE EMERGENCY MANAGEMENT OFFICE], we can ensure that if the worst should happen, our community can survive the disaster and recover stronger.
- One of the best ways a community can prepare for disasters is being involved in the planning process. By facilitating greater community involvement in preparedness planning, we can help ensure that resources meet our needs.
- Ensuring that the members of our community know what to do during
 a disaster makes our community stronger. We're happy to partner with
 [LOCAL OR STATE EMERGENCY MANAGEMENT OFFICE] to ensure this
 information is open and accessible to all.

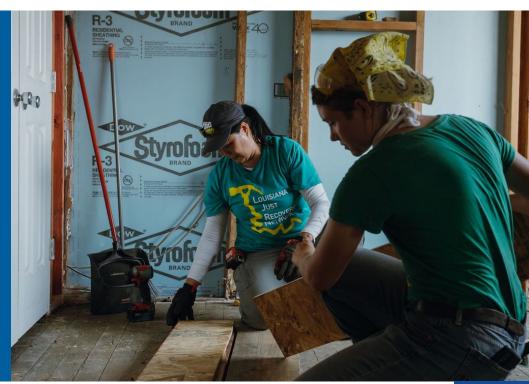


Photo credit: Stephania Tarrant, Louisiana Just Recovery Network

PARTNERING WITH LOCAL EMERGENCY MANAGERS

To [LOCAL OR STATE EMERGENCY MANAGER]:

We are writing you today to propose a partnership between [LOCAL OR STATE EMERGENCY MANAGEMENT AGENCY] and [ORGANIZATION] to improve disaster preparedness and response in [AREA]. With disasters increasing in frequency and severity across the country, and with upheaval and uncertainty regarding FEMA and federal disaster grants, we want to offer our help in collaboratively ensuring that our community can withstand and recover from disasters in the future.

[USE THIS SECTION TO DISCUSS PAST DISASTERS IN YOUR COMMUNITY, IF ANY.]

We are significantly appreciative of your ongoing efforts to protect our lives, homes, and community from disasters. Your work during [RECENT DISASTER] was pivotal in assisting our members in navigating the emergency. We would like to support future efforts in a greater capacity to ensure that all members of the community can be similarly assisted.

Our organization is well placed to assist in community outreach, collaborative planning, and in facilitating training materials and programs.

[USE THIS SECTION TO DISCUSS YOUR ORGANIZATION'S HISTORY AND WHAT YOU MIGHT BRING TO A COLLABORATION].

We would like to assist in developing a series of initial collaborative meetings and workshops to develop clear communications between community-based organizations and [AGENCY/OFFICE], discuss aspects of future disaster response and recovery operations, and ensure that the material and information created by your office is getting to the community members who need it most.

We would appreciate the opportunity to meet with you in person to discuss this concept and any other ways we might be of assistance in your work. Please let us know of your availability for a meeting—we would be happy to host it at [ORGANIZATION LOCATION] or at your offices.

Thank you again for considering this proposal, we look forward to working with you to enhance our community's emergency preparedness. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

TEMPLATE LETTER

Preserving Resilience Funding

A disaster resilience project can take different forms depending on the type of hazards that might threaten a community. These can range from stormwater management projects like drainage systems and flooding prevention projects like levees or berms to creating fire pathways or brush removal projects to lower the risk of wildfires. Historically, these projects have been funded by the federal government through its Hazard Mitigation Grant Program (HMGP) and the Building Resilient Infrastructure and Communities (BRIC) Program. As of this writing, federal funding for hazard mitigation has been targeted for potential cuts by the current Administration.

FEMA's HMGP grants are built around the need for disaster-impacted communities to prepare for future disasters. It is provided at the request of State Governors or Tribal Chief Executives to areas that have received a presidential disaster declaration. While many communities count on these funds, the program has received criticism that by focusing on communities that have experienced recent disasters, it fails to anticipate where future disasters might happen. As a result, FEMA developed the BRIC program. This program is a competitive grant that cities or counties apply for to pay for disaster resilience projects. Instead of focusing these funds on areas that recently experienced a disaster, the program selects projects based on several different requirements, like return on investment and the size of the community being served.

To help prevent these projects from stopping or becoming delayed, community organizations may want to support state and local officials by pushing the federal government to fulfill their obligations and fund these important projects. Organizations should remain in communication with their public officials, including emergency management officials, to settle on a strategy of support. A letter to federal officials regarding a project is just one of the strategies that can be used for pushing for the funding of a project.

TALKING POINTS

- Not only do mitigation and resilience efforts actively reduce risks to life and property, they can also save money in the long term, lessening the need for expensive, large-scale recovery projects after a disaster.
 By funding [DISASTER RESILIENCE PROJECT], we will save funding in the future.
- The U.S. Chamber of Commerce released a <u>report</u> in 2024 detailing that for every dollar taken from disaster resilience funds, it costs a community \$33 in future economic activity. Based on this metric, this grant cancellation costs our community [MULTIPLY CUT GRANT BY 33].
- As disasters become more common and severe, the effort to mitigate
 potential harms and increase community resilience is an absolute necessity. Disasters are occurring with greater frequency and intensity in more
 areas of our country, and the lowest-income and most marginalized
 households are often most at risk. Projects that can help save these communities from the greatest harm are essential and must be funded.
- While these programs often don't outright prevent a disaster from happening, they can lessen their impact, saving lives and homes in the process. Without these grants, disaster impacts will be more severe, along with the displacement, economic hardship, and housing issues that follow.

To help prevent these projects from stopping or becoming delayed, community organizations may want to support state and local officials by pushing the federal government to fulfill their obligations and fund these important projects.

PRESERVING RESILIENCE FUNDING

To [FEMA ADMINISTRATOR]:

We are writing to you regarding the recent decision issued by FEMA regarding [MITIGATION PROJECT] in [AREA]. The decision to terminate this grant will have a direct impact on our community and increase our risk to [HAZARD]—which can take lives, destroy homes, and displace community residents. We request that FEMA reevaluate this decision and provide [MITIGATION PROJECT] with the funds needed for its completion. It is only a matter of time until [TYPE OF DISASTER] occurs again, and we are counting on your agency to fulfill its mission and help us lessen future impacts.

Our community has already experienced how severe the impacts can be from [HAZARD]. [USE THIS SECTION TO DESCRIBE PAST, OR ESTIMATE FUTURE, IMPACTS OF THE HAZARD BEING ADDRESSED]. This is why [MITIGATION PROJECT] is so crucial.

As a result, government partners from [LIST INVOLVED GOVERNMENTS] and members of our community worked together to develop the [MITIGATION PROJECT] proposal. FEMA agreed with its importance and funded the project with [AMOUNT OF FUNDS FEMA STATED THEY WOULD PROVIDE]. Despite these assurances, FEMA has now indicated that those funds will not be provided. We are confused about what type of measures FEMA has used to reevaluate this project given the extensive initial review conducted to fund the project, which included cost, impact, and other analyses.

Without [MITIGATION PROJECT], damage by [HAZARD] to our area will require additional federal disaster assistance, insurance claims, and other costs that will outweigh the amount of funds spent to bring the project to completion. If [MITIGATION PROJECT] cannot continue, these costs will still be incurred by the federal government and will be matched by the suffering of area residents who, again, will be forced to navigate impacts from [HAZARD] that will affect their lives, their homes, and their livelihoods.

We request that FEMA immediately reevaluate the decision to cancel funding for [MITIGATION PROJECT] based upon the impact that [HAZARD] continues to have in our community, the cost savings to the federal government in terms of unnecessary future disaster responses, and the potential for future disasters that will have unrestricted impact to our community. We hope that upon reevaluation, FEMA will realize that funding this project is a perfect example of how FEMA can assist individuals before, during, and after disasters.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].

TEMPLATE LETTER

Identifying Recurring Hazard Risks

While disasters can impact any place and all types of communities, every community doesn't have the same level of risk. Historically low-income communities often experience greater risk due to where they are located—often the result of where policymakers decided to place affordable housing. At the same time, the disaster recovery system isn't built around supporting these communities and emergency managers may not have the connections necessary to understand what is happening. Combined, this situation creates a significant need for advocacy around these hazards to ensure that policymakers are fully aware of the risk a hazard presents to a community, and the consequences if the hazard is not addressed. The hazard and its potential impact will change from community to community, and community-based organizations will need to think about illustrating its potential impact.

As an example, let's imagine that a neighborhood in a low-lying area doesn't have the storm water drains necessary to prevent flooding. Policymakers keep spending funds toward things like highways or power plant upgrades in places outside the neighborhood that don't address the risk. Neighbors will need to show policymakers the impact that future floods could have on their area to show why this risk needs to be addressed. They could illustrate this using several different methods:

They could use past examples to demonstrate future risk. If there have been times when the neighborhood flooded, they could use these examples to show what will continue to happen if the issue is not addressed. The community could also use research to demonstrate the future risk that floods pose to their area. Neighbors could work with researchers from a nearby university or college, or conduct a survey themselves, to demonstrate how likely the neighborhood is to flood if a certain amount of rain falls and what the damage expenses would be.

Regardless, any research or use of past examples must be accompanied by personal stories from neighborhood residents demonstrating the human cost of the hazard. These stories will personalize the data and information being presented and make it more difficult for policymakers to ignore advocacy efforts. Combining these methods will make your advocacy efforts even more powerful. For more information on presenting this type of information, refer to NLIHC's "Advancing Equity Strategies, Tactics, and Best Practices for Disaster-Impacted Communities" toolkit.

TALKING POINTS

- Our area continues to be at risk from [TYPE OF DISASTER OR HAZARD], and the risk continues to increase. [HAZARD] has already cost us [AMOUNT OF \$], our health, and threatens our housing. This situation must be addressed to ensure that members of our community remain financially stable, healthy, and in our homes.
- Our research shows that [HAZARD] is likely to cause even more damage
 in our community in the near future. Instead of waiting until our homes
 are damaged and our lives are disrupted by a disaster, we should invest
 in mitigating [HAZARD] to keep impacts to a minimum. These mitigation
 efforts will end up saving [CITY/COUNTY] funds by avoiding needless
 disaster recovery efforts—not to mention avoiding the needless impact
 on our lives.

The hazard and its potential impact will change from community to community, and community-based organizations will need to think about illustrating its potential impact.

IDENTIFYING RECURRING HAZARD RISKS

To [STATE OR LOCAL OFFICIAL]:

We are writing on behalf of the residents of [AREA] regarding the risk of [HAZARD] to threaten lives and property in their area. As we've worked in the community to [ORG MISSION], we've become aware of the increased risk of [TYPE OF DISASTER] in the area. As we saw during [MOST RECENT DISASTER], the area is highly susceptible to these issues and given the lack of resources of many in the area, these risks have the potential to drive severe economic impacts, displacement, and, in the worst cases, homelessness, among residents of this community. We request that [STATE OR LOCAL GOVERNMENT] work quickly to address this hazard by implementing [MITIGATION PROJECT OR OTHER SOLUTION].

Area residents have been aware of the risk of [HAZARD] for years. Due to the [USE THIS PARAGRAPH TO DESCRIBE THE SPECIFIC HAZARD AND THE LEVEL OF RISK IN THE COMMUNITY].

When [RECENT DISASTER] occurred in [DATE OF RECENT DISASTER], community members were heavily impacted by [HAZARD], with many sustaining damage of their homes from which they are still working to recover. Specifically, [USE THIS PARAGRAPH TO DESCRIBE ANY IMPACTS OF THE HAZARD IN THE COMMUNITY OR SIMILAR COMMUNITIES ELSEWHERE.]

We are aware that [STATE OR LOCAL GOVERNMENT] has access to funding that could be used to address this issue in our community via [TYPE OF GRANT OR FUND]. Given the level of risk in this community, we ask that you consider using these funds to support the creation of [MITIGATION PROJECT OR OTHER SOLUTION]. Given the success similar projects have had in communities like ours, we believe its implementation in our area would have significant success in lowering the level of risk area residents face from [HAZARD]. We recently conducted [RESEARCH OR SURVEY] among area residents and it appears that [USE THIS SPACE FOR SUMMARIZING RESEARCH INTO WHY A PROJECT IS NEEDED].

Not only would this project help keep the lives and property of community members safe from [HAZARD], but it also would save valuable funds. Disaster response is expensive—both in terms of funding and manpower. By preventing the need for this type of costly response to assist our community in recovering, the [STATE OR LOCAL GOVERNMENT] will save funds that can be used for other valuable purposes. [USE THIS SPACE TO TALK ABOUT SPECIFIC SAVINGS IF THERE IS A COST ESTIMATE]

Given the potential benefits of this project to protect lives, property, and save funding, we request that [AGENCY or OFFICE] target available mitigation funds for [MITIGATION PROEJCT OR OTHER SOLUTION]. Given our presence in [AREA] and the work we have already completed on this subject, we would be happy to meet with you to discuss this issue further at your convenience. We are more than willing to provide whatever assistance is necessary to bring this project to completion.

Flood Insurance Barriers

In addition to governmental sources for disaster assistance, insurance plays a significant role in funding disaster recovery for impacted families by providing immediate funding for temporary housing and repairs. At the same time, requirements that flood insurance be maintained for homes in certain areas—such as Special Flood Hazard Areas (SFHAs)—can become a significant barrier for low-income homeowners. For those living in these areas, failure to maintain flood insurance can lead to issues receiving FEMA and HUD assistance in the aftermath of disasters. As a result, dealing with these issues before a disaster occurs is a necessity.

Flood insurance in the United States is largely offered through the FEMArun, subsidized, National Flood Insurance Program (NFIP). Despite this subsidy, the cost of flood insurance can become untenable in certain areas, leading many homeowners to go without. Not only does this deprive these homeowners of the post-disaster assistance that insurance can provide, but it can impact their eligibility for federal assistance. FEMA has a requirement that homeowners in SFHAs who receive assistance from FEMA after their home floods must maintain flood insurance to receive FEMA assistance for future floods. For many low-income homeowners, this becomes untenable given the high cost. If a homeowner cannot afford flood insurance, they are also very likely unable to recover without FEMA assistance.

In addition to prohibitions on FEMA assistance, some HUD long-term recovery programs also maintain similar requirements that flood insurance be maintained in order to access assistance. These sorts of restrictions can magnify the impact of FEMA denials.

Local governments can do many things to lower insurance costs to make flood insurance accessible. In some instances, state or local funds could be used to pay for policies. In others, group flood insurance policies can be created that subtract flood insurance payments from FEMA awards. A community can also achieve lower rates from NFIP through stormwater runoff projects, education efforts, or other programs. A community with high insurance costs can also request a re-evaluation of flood maps by FEMA. If there is an error in the mapping, FEMA might have incorrectly categorized an area as a SFHA, penalizing those living in the area.

Regardless, advocates should remain aware of this flood insurance requirement and work with their state and local governments to help address the situation before disasters occur.

TALKING POINTS

- For the individuals of [COMMUNITY], flood insurance has proven too expensive to maintain. Given FEMA's requirement that homeowners in the area maintain flood insurance to receive future assistance, this problem has the potential to be catastrophic for our area should a disaster occur. Policymakers need to know that this problem threatens the existence of [COMMUNITY]. They must work with residents to address it.
- Residents of [COMMUNITY] are still reeling from [RECENT DISASTER].
 Given the financial impact of recovery on area homeowners, the
 requirement that we pay ever-increasing insurance costs is too great
 a burden for many to bear. Even worse, FEMA requires us to maintain
 flood insurance to receive future assistance. This means that during
 the next disaster, our area will face an even more difficult struggle to
 recover. We need our policymakers to work with FEMA and the federal
 government to try and address this issue before the worst happens.



FLOOD INSURANCE BARRIERS

To [STATE OR LOCAL OFFICIAL]

We write to recommend that [STATE OR LOCAL AGENCY] engage in immediate action regarding the unaffordability of flood insurance that survivors of [DISASTER] in [COMMUNITY] are required to maintain in order to receive future FEMA individual assistance. [STATE OR LOCAL AGENCY] has both the responsibility and the capacity to protect these families and communities.

Lack of flood insurance is a serious obstacle for families surviving disasters, often preventing them from accessing FEMA and other assistance funds. In its rules, FEMA maintains an insurance requirement for future damage caused by floods, particularly when a household lives in a flood zone like a Special Flood Hazard Area (SFHA). This requirement is applicable to families who applied for and received FEMA assistance to address the effects of flooding from [DISASTER]. Survivors who do not obtain this insurance may not have access to assistance to repair, replace, and rebuild homes, as well as to cover losses to impacted personal property in the event of future flood damage.

This flood insurance gap is highly relevant to [STATE OR REGION]. It is estimated that close to [PERCENTAGE] of the population of [STATE OR REGION] lives in areas of medium-high or high risk of flooding. More than [NUMBER OF HOMES] homes are in flood zones. The structural barriers to obtaining insurance are often insurmountable. Many are not aware of this requirement—something compounded by the costs of premiums that are out of reach for impoverished families.

In addition to our outreach to federal officials, we are turning to [STATE OR LOCAL AGENCY] to take affirmative action and promote the purchase of flood insurance through subsidizing the costs with state funding and promoting the use of Group Flood Insurance Program (GFIP) policies that can provide impacted residents with flood insurance for up to three years.

We urge [STATE OR LOCAL AGENCY] to carry out an evaluation of the costs of these different alternatives and consider ways to target assistance to areas with the greatest flood risk. Doing so will ensure that those most impacted by [RECENT DISASTER] will be able to recover from the next.

Buyout Programs

For areas where repeated, intense, flooding has threatened the lives and property of residents, some communities may choose to implement a "buyout program" for the owners of homes in the impacted area. This program involves the state or local government voluntarily purchasing homes from impacted homeowners and then redeveloping the area into open space where flooding does no harm. When done correctly, this type of program is an excellent mitigation strategy. Homeowners can sell homes that would otherwise be unsellable on the private market and relocate to safer areas of the community, the government can move residents out of harm's way and save funding on disaster response, and the flood risk of the community decreases. Buyout programs are intricate, and advocates and community-based organizations will need to ensure that all residents of the community can access the program and receive its benefits.

Buyouts have too often left people of color and lower-income people displaced while allowing wealthier, predominantly white communities to remain in equally or more risky locations by using mitigation projects to lower their flood risk. As a result, buyouts should only be undertaken after direct consultation with affected residents, and only after all alternatives are investigated.

The obligation to community access and fair compensation doesn't end when a participant enters a voluntary buyout program. Many households have invested significant generational wealth into their homes—something that must be protected in a buyout program. If a home is bought out at a smaller price due to the flood damage that prompted the program, this wealth will be lost. As a result, programs must purchase homes at a cost that doesn't take recent flood damage into consideration—facilitating an easy transition to safer areas of the community.

Programs must also have additional systems in place to ensure that impacted renters can find a range of alternative housing that meets their needs. In addition, for residents with disabilities, any relocation must ensure that they are able to occupy homes that match their needs and allow them to receive the assistance necessary for them to remain independent.

TALKING POINTS

- Before planning a buyout program for [COMMUNITY], we must be sure that all other alternatives have been considered. The relocation of an entire community is a difficult and painful process, and we owe it to community residents to keep them safe in their original homes if at all possible.
- This buyout program must ensure that all impacted households can relocate to other areas of the community away from high-risk flooding. The program must compensate homeowners for the original value of their homes—preserving the time and funds spent for generations and ensuring that impacted families can relocate to the safer area of their choice.
- Homeowners are not the only people impacted by this repetitive flooding. Renters have weathered these storms, often without the level of assistance provided to homeowners. The renters displaced by this project must be adequately compensated and assisted in finding alternative rental housing that suits their needs.



BUYOUT PROGRAMS

To [STATE AND LOCAL OFFICIAL]:

We are writing on behalf of residents of [AREA] regarding the buyout program planned by [STATE OR LOCAL AGENCY] for flood-impacted homes in the area. When done correctly, buyout programs have been successful in lowering flood risk and improving housing standards of participants. Where done incorrectly, buyout programs have increased risk and economic precarity, relocated individuals away from the services and networks they rely on to survive, and enriched for-profit developers. To ensure that the program for [AREA] is successful, we request that the following principles be met:

We request that adequate public consultation be conducted with [AREA] residents during all points of the program, as this will allow for residents to be continually informed as to the program's progression and let residents use their knowledge and expertise of the area and its flooding issues to help guide the program.

We request clear assurances that properties acquired during the program will be deed-restricted in perpetuity to preclude any future development beyond parkland or stormwater management. This will assure community residents that the buyout is an environmental and geographic necessity and not an exploitive scheme.

We request that all homeowners and renters in the targeted area be able to benefit from buyout plans irrespective of income, wealth, or membership in any protected class. In addition, the options for relocation must address fair housing by ensuring that relocated households have a range of options to move to.

We request that renters impacted by a property owner's decision to voluntarily sell their building be compensated for any moving expenses and personal costs involved and that they receive housing navigator support in order to access a suitable housing unit that meets their needs in a safe area of our community. This must also be applied for renters who were evicted from their homes in the months leading up to program participation.

We request that the program purchase homes based on the pre-flood value of the property. This will ensure that any generational wealth stored in these homes is not lost by participation in the program.

We request that, for any resident living with a disability, [STATE OR LOCAL AGENCY] ensure they can access information regarding this program via interpretation, including during public meetings regarding the program, and that [STATE OR LOCAL AGENCY] ensure they receive the services and support necessary to remain living independently.

We request that a response be provided to us in writing affirming [STATE OR LOCAL AGENCY]'s intention to follow these requests. Thank you again for all your work in setting up this program. We believe that it has the potential to significantly improve the lives of residents repeatedly impacted by disasters.

We request a prompt response to this letter. For more information or to continue this discussion, we urge you to contact us at [INSERT YOUR CONTACT INFORMATION].



Photo credit: Stephania Tarrant, Louisiana Just Recovery Network





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