



U.S. Department of Homeland Security
FEMA Region 6
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FEMA

January 17, 2023

Casey Tinge, Director
Governor's Office of Homeland Security and Emergency Preparedness
7667 Independence Boulevard
Baton Rouge, LA 70806

SUBJECT: FEMA-4611-DR-LA Rent Waiver Request

This letter is in response to the State of Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) request, dated January 13, 2023, for delayed implementation of rent collection for Direct Housing households throughout the course of the recently approved 6-month extension period (February 28, 2023, through August 29, 2023).

The state asserts that this is the first implementation of non-congregate sheltering (NCS) utilizing travel trailers which continues to be regarded as a critical and successful aspect of Hurricane Ida recovery. As it overlaps with Direct Housing in a number of ways, FEMA and the State have worked diligently to reduce complexities and confusion for survivors and communities. FEMA approved a final extension for NCS through December 31, 2022, and the state has expressed that their intent is to continue state funded NCS through May 2023.

The State of Louisiana has also expressed that due to the challenges and level of effort required to implement Direct Housing, the program continues to take longer to ramp up and longer to end. In particular, these delays were more significant for Hurricane Ida than for previous Direct Housing missions in our state. The practical result of these timing challenges is that for those survivors who waited in queue for the assistance for the longest period will be further impacted if they are required to pay rent at this point. FEMA, however, lacks the authority under the Stafford Act to approve the request for applicant-specific timelines because the Stafford Act establishes the period of assistance and ties rent collection to 18 months from the date of declaration.

The State of Louisiana has also expressed that data collected through Disaster Case Management and recent testimony before Legislative hearings indicates families are experiencing ever-increasing delays, obstacles and lack of responsiveness from insurance companies. Further, Federal programs intended to support the recovery of these families are also slow and difficult to navigate. For many survivors, the only pathway to achieving their permanent housing plan is through CDBG-DR funding (the State's Restore Program). The administrative process to access this funding required a number of months and the grant agreement between the State and HUD was finally signed in late September 2022.

With several previous direct housing missions in Louisiana, FEMA has also taken into consideration consistency among housing missions. For FEMA-4277-DR-LA, the State requested to extend Direct Temporary Housing Assistance and to waive rent collection on November 1, 2017. On November

30, 2017, the extension was approved through May 15, 2018, but request to waive rent collection was denied. However, rent reduction was included in the first two extension approvals. As part of the first extension, FEMA authorized an automatic reduction of Temporary Housing Unit (THU) rent to the policy minimum of \$50 per month through May 15, 2018. On April 20, 2018, FEMA extended the THU rent waiver through June 2018. As part of the second extension, the rent incrementally increased up to 50% of the HUD FMR in July 2018 and then to the HUD FMR in August 2018.

For FEMA-4559-DR-LA and FEMA-4570-DR-LA, the State of Louisiana requested an extension through October 31, 2022 and requested that FEMA waive rent during the extension period on November 17, 2021. On January 18, 2022, FEMA approved extensions for DR-4559-LA and DR-4570-LA through October 31, 2022 and denied the request to completely waive rent. However, FEMA authorized a streamlined adjusted rent collection process which automatically reduced the rent to \$50 per month for occupants who provide documentation of their post-disaster income that meets or is below the HUD Very Low-Income Limit, which for a three-person household ranged between \$21,800 and \$30,800 in approved parishes. In addition, Applicants did not have to provide documentation of pre-disaster income and housing expenses under the streamlined process. Almost all occupants in these disasters received a reduced rent under the streamlined process.

For FEMA-4611-DR-LA, the State requested an extension for DR-4611-LA through August 28, 2022, on September 16, 2022. On October 21, 2022, FEMA approved the extension request in addition to streamlined adjusted rent collection process and authorized policy waivers to the existing sales price calculation process which aligned with the DR-4559-LA and DR-4570-LA approvals.

In support of the State of Louisiana's request and consistency across direct housing missions, FEMA authorizes a waiver to FP-104-009-03, Individual Assistance Program and Policy Guide (IAPPG) Chapter 3, Section V, 5. Rent Collection for FEMA Temporary Housing Unit, an automatic reduction of Temporary Housing Unit (THU) rent to the policy minimum of \$50 per month through May 31, 2023, to coincide with the timeline that the state intends to end non-congregate sheltering and implement the approved streamlined adjusted rent collection process, thereafter, authorized on October 21, 2022.

If you have any questions or need any additional information, please contact Traci Brasher at 202-702-5183.

Sincerely,

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ROBINSON

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George A Robinson
Regional Administrator

cc: Benjamin Abbott, Federal Coordinating Officer, DR-4611-LA
Traci Brasher, Recovery Division Director, Region 6