



June 7, 2022

The Honorable Joseph R. Biden
President
United States of America
Washington, D.C.

The Honorable Susan Rice
Director
Domestic Policy Council
Washington, D.C.

The Honorable Marcia Fudge
Secretary
Department of Housing & Urban Development
Washington, D.C.

The Honorable Deanne Criswell
Administrator
Federal Emergency Management Agency
Washington, D.C.

To President Biden, Director Rice, Secretary Fudge, and Administrator Criswell:

On behalf of the National Low Income Housing Coalition (NLIHC) and the Disaster Housing Recovery Coalition (DHRC), I write to express deep concern that efforts by the Federal Emergency Management Agency (FEMA) and U.S. Department of Housing and Urban Development (HUD) to stand up a new Disaster Assistance and Supportive Housing (DASH) program have largely stalled and that this critical program is not available to low-income disaster survivors for the 2022 Atlantic Hurricane Season. DASH is based on the Disaster Housing Assistance program (DHAP), which has been used by past Democratic and Republican administrations to provide the lowest-income and most marginalized disaster survivors with the longer-term housing assistance and case management services needed to get back on their feet. Delays in activating DASH put disaster survivors at risk of displacement and, in worst cases, homelessness. Without this housing assistance, survivors are often forced to move into uninhabitable or overcrowded homes, stay at shelters, or sleep in their cars or on the streets. Because those most impacted are disproportionately Black, Indigenous, and other people of color, the failure to activate DASH will undermine the Biden administration's efforts to advance racial equity.

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 leads the Disaster Housing Recovery Coalition of more than 850 national, state, and local organizations, including many working directly with disaster-impacted communities and with first-hand experience recovering after disasters. We work to ensure that federal disaster recovery efforts prioritize the housing needs of the lowest income and most marginalized people in impacted areas.

DASH uses DHAP as a model for providing low-income, displaced survivors with the safe, accessible, and affordable rental homes they need to rebuild their lives and get back on their feet. DHAP was used successfully after past disasters, including Hurricanes Katrina, Rita, Gustav, Ike, and Sandy. By combining temporary rental assistance and wrap-around case management services, DHAP helped survivors find permanent housing solutions, secure employment, and connect to public benefits. Despite the clear benefits of DHAP, the Biden administration has not activated the program.

Existing FEMA housing programs are an insufficient replacement for DHAP or DASH.

FEMA's temporary shelter and housing assistance programs are insufficient and often inaccessible to those who need housing assistance the most. Low-income families are often unable to access FEMA's Transitional Shelter Assistance Program (TSA) motels due to financial and other barriers, including the practice of motels charging daily "resort" fees and requiring security deposits or credit cards. Because TSA must be renewed every 14 days, those survivors who are able to access the program face arbitrary deadlines that cause them to scramble to submit required paperwork or leave the motel before finding a permanent housing solution. While FEMA is authorized to provide TSA for at least 18 months, the program has been abruptly terminated in the past, forcing survivors to find alternative housing or to return to their uninhabitable homes with just a few hours' notice.

FEMA's temporary housing programs, including direct housing and rental assistance, are also inaccessible to low-income survivors. FEMA's rental assistance is based on the fair market rent in the county or territory impacted by the disaster, which may be inadequate to meet post-disaster rental rates in communities where survivors have been displaced. Because assistance is renewed in two-month increments, it can be difficult to find landlords willing to sign longer-term leases, and a difficult and onerous application process means that many eligible survivors fail to successfully apply for aid.

In recent years, FEMA piloted state implementation of temporary housing programs. State-run disaster housing programs faced significant delays and have been unable to address the full scale of the housing needs in large part because FEMA continued to retain control over eligibility and the program-assignment process. According to FEMA, only a few hundred families were served under state-administered housing programs following Hurricanes Harvey and Irma, while state-administered programs like Multifamily Lease and Repair were wholly unsuccessful because property owners declined to participate.

Without access to housing assistance after a disaster, low-income survivors often have little choice but to move into uninhabitable or overcrowded homes, stay at shelters, or sleep in their cars or on the streets. There are numerous accounts of individuals who were unable to access FEMA TSA that later needed emergency hospital care after returning to mold-infested homes. In some cases, families that failed to find housing with FEMA rental assistance programs have set up "tent cities" because they had no place to go.

Improving Disaster Case Management (DCM) service is not a replacement for DHAP or DASH.

While we applaud FEMA's efforts to strengthen its DCM program, housing and social work providers know from decades of experience that intensive counseling and case management support alone does not result housing stability; such support must be supplemented by longer-term housing assistance. Improving DCM services is needed, but without the longer-term housing assistance provided by DHAP or DASH, such efforts will do little to improve the rate at which the lowest income households fully recover.

Simply referring survivors to existing HUD programs is not sufficient to address urgent, housing needs.

Although HUD's existing programs serve as a model for DHAP and DASH, they are not a sufficient replacement for emergency housing assistance from FEMA. Simply referring

disaster survivors to HUD programs means that survivors could be forced to wait years – and in some cases, decades – for assistance on extremely long waiting lists.

I urge FEMA and HUD to work quickly to ensure that this critical emergency housing resource is implemented as soon as possible to help those most impacted by disasters fully and equitably recover.

Sincerely,

A handwritten signature in cursive script that reads "Diane Yentel".

Diane Yentel
President and CEO
National Low Income Housing Coalition

CC:

Erika Poethig, *Special Assistant to the President for Housing and Urban Policy at the White House Domestic Policy Council*

Jenn Jones, *Chief of Staff, U.S. Department of Housing and Urban Development*

Peggy Bailey, *Senior Advisor on Rental Assistance at the U.S. Department of Housing and Urban Development*