

Statement for the Record of the National Low Income Housing Coalition

Presented to the Committee on Transportation and Infrastructure
Subcommittee on Economic Development, Public Buildings, and Emergency Management
United States Housing of Representatives
Hearing on “FEMA Priorities for 2022: Stakeholder Perspectives”
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Committee Chair DeFazio and Ranking Member Graves, Subcommittee Chair Titus and Ranking Member Webster, and members of the Committee, thank you for the opportunity to submit a statement for the record on FEMA’s priorities for 2022.

The National Low Income Housing Coalition 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.

NLIHC has worked on disaster housing recovery since Hurricane Katrina, and from this experience, we have come to a simple conclusion: America’s disaster housing recovery system is fundamentally broken and in need of major repair and reform. It is a system that was designed for middle-class people and communities, a system that never contemplated, and so does not address, the unique needs of the lowest income and most marginalized people. Because of this fundamental design flaw, these families are consistently left behind in recovery and rebuilding in disaster after disaster. The disaster recovery system not only ignores the needs of the lowest-income people, but it exacerbates many of the challenges they faced prior to the storm: disaster response and recovery often worsen the housing crisis, solidifies segregation, and deepens inequality.

When disasters strike, the lowest-income and most marginalized survivors are often hardest hit. They have the fewest resources and face the longest, steepest path to recovery. Despite the clear need, federal efforts frequently leave these survivors without the assistance needed to recover and leave their communities less resilient to future disasters. Without this critical assistance, many of the lowest-income and most marginalized survivors return to uninhabitable homes, sleep in cars or 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 displacement, eviction, and, in worst cases, homelessness.

This statement for the record will discuss ways FEMA can remove key barriers to an equitable and comprehensive disaster housing recovery and all disaster survivors receive the assistance they need to fully recover. These [barriers](#) and [opportunities](#) for reform are reflected in “Fixing America’s Broken Disaster Housing Recovery System,” a two-part report published by NLIHC and Fair Share Housing Center of New Jersey.

These policy recommendations also reflect nine core principles that should guide our country's disaster housing response and recovery:

1. Recovery must be centered on survivors with the greatest needs and ensures equity among survivors, especially for people of color, low-income people, people with disabilities, immigrants, LGBTQ people, and other marginalized people and communities;
2. Everyone should be fairly assisted to fully and promptly recover through transparent and accountable programs and strict compliance with civil rights laws, with survivors directing the way assistance is provided;
3. Securing help from government must be accessible, understandable, and timely;
4. Everyone in need should receive safe, accessible shelter and temporary housing where they can reconnect with family and community;
5. Displaced people should have access to all the resources they need for as long as they need to safely and quickly recover housing, personal property and transportation;
6. Renters and anyone experiencing homelessness before the disaster must quickly get quality, affordable, accessible rental property in safe, quality neighborhoods of their choice;
7. All homeowners should be able to quickly rebuild in safe, quality neighborhoods of their choice;
8. All neighborhoods should be free from environmental hazards, have equal quality, accessible public infrastructure, and are safe and resilient; and
9. Disaster rebuilding should result in local jobs and contracts for local businesses and workers.

These core principles and the following policy recommendations should serve as a guidepost for the FEMA as it continues to pursue its mission in 2022. Additional recommendations can be found in the DHRC's [transition memo](#) to the Biden administration, comments to FEMA's [Request for Information](#), and a previous [written statement to this committee](#) on ensuring equity in disaster preparedness, response and recovery.

Barriers to FEMA Assistance

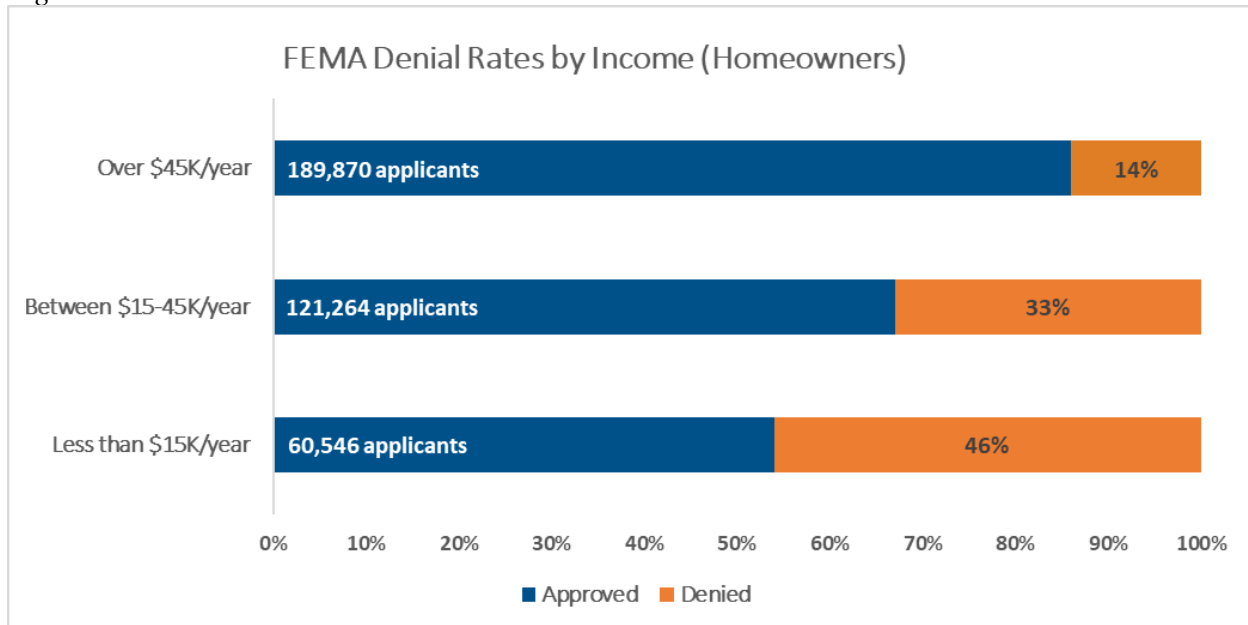
FEMA programs can provide crucial assistance to help survivors recover from a disaster by providing temporary shelter and financial assistance and making basic structural repairs to homes. However, FEMA has created unnecessary and often insurmountable barriers to accessing these programs.

FEMA programs are not designed to serve lower-income people with the greatest needs; these households are consistently denied assistance. For example, nearly 95% of applicants for recovery assistance after the 2020 wildfire season were denied assistance by FEMA.¹ After the

¹ McMinn S. 2021. FEMA Rejected 95% of Aid Applicants During California's Last Wildfire Disaster. Why?. Retrieved from <https://www.npr.org/2021/07/02/1011877546/fema-rejected-95-of-aid-applicants-during-californias-last-wildfire-disaster-why>

2020 wildfire season in Oregon, FEMA had denied 70% of non-fraudulent claims.² This effect occurs during other disasters as well. Applicants for assistance with the lowest incomes were denied FEMA Individual Assistance (IA) at very high rates after Hurricane Harvey. The vast majority of higher-income households were approved³ (see Figure 1).

Figure 1.



There are multiple administrative steps that FEMA can take to ensure survivors with low incomes can access the resources needed to fully and equitably recover.

Provide equal eligibility for people experiencing homelessness.

People experiencing homelessness are often most at risk during a disaster and have the fewest resources to recover. People experiencing homelessness are unlikely to have the resources needed to adequately prepare for or evacuate prior to a disaster, and their unique needs are often overlooked by emergency managers when planning for disasters. During the recovery, homelessness resources are stretched thin to accommodate those households that became housing insecure because of the disaster and resources for pre-disaster homeless populations are deprioritized. Communities are often unable to return to the level of care provided to people experiencing homelessness before the disaster.

Despite the clear need, people experiencing homelessness are often excluded from or face additional barriers to FEMA resources, including mass shelters and individual assistance.

² McMinn S. 2021. As Western Wildfires Worsen, FEMA is Denying Most People Who Ask for Help. Retrieved at: <https://www.npr.org/2021/07/01/1010897265/as-western-wildfires-worsen-fema-is-denying-most-people-who-ask-for-help>

³ Adams, A. 2018. Low-income Households Disproportionately Denied by FEMA Is a Sign of a System that is Failing the Most Vulnerable. Retrieved from <https://texashousers.org/2018/11/30/low-income-householdsdisproportionately-denied-by-fema-is-a-sign-of-a-system-that-is-failing-the-most-vulnerable/>

Following Hurricane Irma, there were reports of people experiencing homelessness being forced to wear armbands and be separated from other disaster survivors.⁴ Pre-disaster homeless populations are often denied FEMA assistance, even if all their belongings were destroyed in the disaster.⁵ These actions further stigmatize people experiencing homelessness and often prevent them from accessing the resources they need to stay safe.

What eligibility individuals experiencing homelessness have for FEMA programs are often contingent upon proof that they resided in a tent or another form of “non-traditional housing” – something that is difficult to show in the chaotic aftermath of a disaster. While those living in tents that can show occupancy are deemed eligible for some forms of short-term housing assistance, those unable to do so are only eligible for reimbursement for transportation, medical and dental expenses, childcare, and funeral expenses. Reimbursement-based programs are of little use to individuals experiencing homelessness given their lack of resources.

In 2022, FEMA must directly ensure that individuals and families experiencing homelessness access the assistance they need to recover. The agency must directly establish that people experiencing homelessness prior to the disaster are eligible for the same emergency shelter and housing recovery resources available to impacted renters. The provision of assistance must not be arbitrarily based on whether the individual resided in a tent or temporary structure prior to the disaster.

In addition, to help the agency assess the unique needs of the pre-disaster population of individuals and families experiencing homelessness in a certain area, FEMA must include in its standard recovery assistance plan and preliminary damage assessments an on-site assessment of homeless encampments and shelters. This will provide the agency with an idea as to the pre-existing support structure for individuals and families experiencing homelessness, as well as the ongoing need for outreach and assistance to ensure these individuals are able to apply and receive the assistance that they need to recover.

Modernize FEMA’s interpretation of the Stafford Act’s nondiscrimination clause.

FEMA’s interpretation of the Stafford Act’s non-discrimination statute prevents the agency from fully addressing the barriers to opportunities and benefits for people of color and other underserved groups. The Stafford Act and related regulations prohibit discrimination on the basis of color, race, nationality (including limited English Proficiency), sex, religion, age, disability, or economic status when carrying out federal assistance functions at the site of a major disaster.⁶

Specifically, Section 308(a) of the Stafford Act directs regulations to ensure that “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.”

⁴ Dearen, J., & Kennedy, K. 2017. *Yellow Wristbands, Segregation for Florida Homeless in Irma*. Retrieved from <https://www.usnews.com/news/us/articles/2017-09-29/yellow-wristbands-segregation-for-florida-homeless-in-irma>

⁵ Ehrlich, A. 2019. *After Wildfires, Homeless People Left Out of Federal Disaster Aid Programs*, Oregon Public Broadcasting. Retrieved from <https://www.opb.org/news/article/fema-disaster-aid-wildfires-homeless-people/>

⁶ 42 U.S.C. 5151; See also 44 CFR § 206.11; 44 CFR § 7.5

Based on previous discussions with FEMA staff, the agency-wide interpretation of this statute prevents special consideration from being provided to individuals that would allow additional services or assistance to be provided based the factors listed above. This incredibly strict interpretation is unique among agencies that offer assistance programs.

FEMA must change its interpretation of the Stafford Act’s non-discrimination statute to meet the unique needs of people of color and other underserved groups. Instead of using the non-discrimination language of the Stafford Act to justify its lack of action regarding the severe and unique needs of people of color and other underserved groups – including individuals and families experiencing homelessness, households with low incomes, individuals with disabilities, and individuals with Low English Proficiency – the agency should adopt an interpretation that allows all individuals to access the assistance they need to recover. Many other federal agencies have interpreted their respective non-discrimination statutes as to allow individuals with unique needs to receive specialized treatment, and FEMA should follow suit.

Create a universal application for assistance from all federal agencies.

With so many federal agencies active in the aftermath of a disaster many survivors can easily become overwhelmed with the complicated process, leading to incomplete applications, confusion over how programs function, and failure to gain any assistance at all.

As many disaster survivors and advocates have discovered, applicants eligible for disaster assistance are often deemed ineligible because of inflexible and arbitrary requirements and confusing bureaucratic processes, despite an applicant’s clear need for disaster assistance.⁷ FEMA’s application process is confusing, lengthy, and burdensome. Disaster survivors are required to submit several applications to federal agencies such as the SBA, along with multiple layers of personal identification, proof of ownership and residency, citizenship, insurance reporting, and more. Many of these same requirements will need to be repeated later in the disaster recovery process when HUD funds become available. As a result of these barriers, FEMA denial rates have reached extremely high levels in recent disasters, raising questions about why so many are being turned away.⁸

The complexity of the IA and IHP application and appeals process perpetuate barriers to opportunity and benefits for people of color and other underserved groups. In addition to the example of Hurricane Harvey IA approval provided above (figure 1.), a review of Individual Assistance applications in the aftermath of Hurricane Delta found that majority-African American zip codes were denied assistance at a rate more than double those of majority-white zip codes.⁹

⁷ 6 Danny Vinik, “‘People Just Give Up’: Low Income Hurricane Victims Slam Federal Relief Programs,” Politico, May, 29, 2018. Available at: <https://www.politico.com/story/2018/05/29/houston-hurricane-harvey-fema-597912>

⁸ Hannah Drier, “Assistance Not Approved”, Washington Post (April 2021), Available at: <https://www.washingtonpost.com/nation/2021/04/25/fema-disaster-assistance-denied/>

⁹ Christopher Flavelle, “Why Does Disaster Aid Often Favor White People”, New York Times (June 2021), Available at: <https://www.nytimes.com/2021/06/07/climate/FEMA-race-climate.html>.

In addition to presenting obstacles for survivors, the duplicative nature of the application processes serves to lengthen the amount of time it takes to get assistance to those in need. A required housing inspection can take up to 10 days after the submission and verification of application documents have been completed and FEMA has stated that it can take up to 90 days to process an appeal once it is received.¹⁰ 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.

FEMA, SBA, HUD, and other federal agencies involved in disaster recovery efforts should work to create a single, universal application for aid with the explicit goal of making the process easier and less burdensome on survivors. This simple step would save countless hours spent by survivors applying for assistance. By working with fellow agencies to create a universal application allowing survivors to apply for numerous programs through one form, FEMA can not only ensure that these recovery programs are accessible to all survivors, but make the entire process more efficient.

FEMA's Failure to Address Housing Needs

Despite the clear need, FEMA housing programs neglect the housing needs of America's lowest-income 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 eviction and, in worst cases, homelessness.

FEMA's rental assistance program does not adequately address the needs of low-income survivors. The assistance program is based on the county or territory fair market rent and may be inadequate to meet post-disaster rental rates. Families receiving FEMA rental assistance are frequently victims of housing discrimination, and because assistance is only given in two-month increments, landlords may be unwilling to enter into longer-term leases. Often, vacant rental housing may simply not be available in the wake of a disaster.

FEMA assistance expiration dates often do not line up with additional recovery programs, such as HUD's Community Development Block Grant – Disaster Recovery program. This creates a gap in recovery support that can result in people of color and other underserved groups being forced to live on the street, cars, or their damaged or destroyed homes. Disaster survivors are susceptible to trauma, and a lapse of program assistance, even if just for a few days, can cause significant harm to households that have already been displaced by a disaster.¹¹ A year after

¹⁰ Texas Law Help, "Disaster Manual: Section 2 – FEMA and Related Forms of Assistance" (September 2021), Available at: <https://texaslawhelp.org/article/disaster-manual-section-2-fema-and-related-forms-of-assistance#top>; FEMA, "FAQ: Setting the Record Straight on FEMA Assistance for Hurricane Ida – NY" (December 2021), Available at: <https://www.fema.gov/fact-sheet/faq-setting-record-straight-fema-assistance-hurricane-ida-ny>

¹¹ Susanne Babbel, "The Trauma That Arises from Natural Disasters," Psychology Today, April 2010. Available at: <https://bit.ly/3hyUd1o>

Hurricane Harvey, nearly 20% of individuals experiencing homelessness in the city of Houston reported that they became homeless due to the disaster.¹²

Research from NLIHC demonstrates that disasters exacerbate the existing rental housing crisis for households with the lowest incomes.¹³ After Hurricane Sandy, households already dealing with housing instability were further destabilized through displacement and increased rents. Two years after Sandy, few new affordable homes had been completed yet survivors were no longer eligible for federal rental assistance.¹⁴

Following Hurricane Harvey, 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.¹⁵ 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.¹⁶

After 18 months from the date of the presidential disaster declaration, households utilizing FEMA direct temporary housing are typically required to leave.¹⁷ Survivors are required to demonstrate continuing need for program enrollment and work toward a permanent housing plan. Extensions are commonly granted but the process for requesting for such extensions are often unknown. Often, families in need of housing after the passage of the 18-month deadline are expected to start paying often unaffordable rents on their trailers. The DHS Office of Inspector General found that substantial oversight issues existed with state-run disaster housing recovery programs were implemented in Puerto Rico after Hurricane Maria.¹⁸

Eliminate barriers to FEMA’s Transitional Shelter Assistance Program.

Financial barriers often prevent low-income survivors from accessing FEMA’s Transitional Sheltering Assistance (TSA), which provides disaster survivors with short-term housing in the

¹² Eva Vigh, “Hurricane Harvey Caused Homelessness Lingers in Harris County 2 Years Later,” Community Impact, August 20, 2019. Available at: <https://bit.ly/3hEvKHW>

¹³ National Low Income Housing Coalition. 2019. Long-term Recovery of Rental Housing: A Case Study of Highly Impacted Communities in New Jersey after Superstorm Sandy. Retrieved from <https://nlihc.org/sites/default/files/Sandy-Rental-Recovery-Report.pdf>

¹⁴ Fair Share Housing Center, Latino Action Network & NAACP New Jersey State Conference. 2015. The State of Sandy Recovery (Second Annual Report). Retrieved from http://fairsharehousing.org/images/uploads/State_of_Sandy_English_2015.pdf

¹⁵ Id.

¹⁶ Jasper Scherer and Mike Morris, “Three Years After Harvey, Recovery Programs Continue To Lag, Who is to blame?,” Houston Chronicle, August 29 2020, Available at: <https://www.houstonchronicle.com/news/houstontexas/houston/article/Three-years-after-Harvey-Houston-s-home-repair-15523516.php>

¹⁷ FEMA, Individual Assistance Program and Policy Guide (2021), pg. 80, Available at: https://www.fema.gov/sites/default/files/documents/fema_individual-assistance-program_policy-guide_05-26-2021.pdf

¹⁸ DHS Office of Inspector General “FEMA Should Apply Lessons Learne from the STEP Pilot Program Implementation in Puerto Rico to Future Programs”, OIG-22-25 (February 4, 2022), Available at: <https://www.oig.dhs.gov/sites/default/files/assets/2022-02/OIG-22-25-Feb22.pdf>

form of hotel rooms. Currently, participating hotels charge daily “resort” fees, require security deposits, and require that displaced households have credit cards – all of which are barriers for low-income households that have already depleted any savings that they may have had and that are often unbanked or underbanked.¹⁹

In the chaos after a disaster, survivors often find the constant reapplication requirements to be further traumatizing and many leave TSA without a permanent housing plan.²⁰ Without the affordable and accessible homes survivors need, many have had no choice but to return to uninhabitable homes, sleep in cars or tents, stay at shelters, double- or triple-up with other low-income families, or pay more than half of their limited incomes on rent, putting them at increased risk of eviction and homelessness. In some cases, failure to access the TSA program can lead to even worse outcomes; there are numerous accounts from many recent disasters where individuals unable to access FEMA’s TSA program returned to sleep in mold-infest homes and requiring emergency hospital care as a result.²¹

While FEMA is authorized to provide TSA for at least 18 months, the Trump administration abruptly terminated the program for dozens of Puerto Rican families displaced to the mainland after Hurricane Maria, forcing them to find alternative housing or to return to their uninhabitable homes on the island with just a few hours’ notice.²² States that received large numbers of displaced Puerto Rican survivors – including Massachusetts and Connecticut – saw increased homelessness as a result.

FEMA must bar hotels from requiring survivors to have a credit card or a security deposit, or to pay any additional fees beyond the amount covered by FEMA to access the program. FEMA must make publicly available monthly information on the number of households in TSA hotels, when funding for those rooms will expire, and how many individuals have moved out of TSA-funded rooms – including whether they have moved to permanent housing or violated terms of the program. The agency should do this after every disaster.

FEMA must also authorize TSA in increments longer than the current 14-day policy and ensure that program participants are aware of proposals to extend the TSA program beyond the initial period of assistance and ensure that participants are given adequate notice prior to premature termination of the program.

¹⁹ FEMA, Fact Sheet: Transitional Sheltering Assistance (TSA), 2018, Available at: <https://www.fema.gov/pressrelease/20210318/fact-sheet-transitional-sheltering-assistance-tsa>

²⁰ U.S. Senator Kamala D. Harris, Letter to FEMA Administrator Peter Gaynor, May 22, 2019. Available at: <https://www.harris.senate.gov/imo/media/doc/052219%20Camp%20Fire%20Housing.pdf>

²¹ See S. Bachom, “Got Mold? Cold? FEMA?” Hurricane Sandy Nightmare Continues in Rockaway”, Huffington Post (2017), Available at: https://www.huffpost.com/entry/got-mold_b_2541741

²² See Connecticut, https://www.buzzfeed.com/briannasacks/fema-abruptly-cuts-housing-funds-for-dozens-ofpuerto-rican?utm_term=.cbeGk92boD#.htP3MLRP29; Pennsylvania, <https://www.pri.org/stories/2018-02-13/puerto-ricans-who-evacuated-philadelphia-worry-help-will-soon-run-out>; Massachusetts, http://www.masslive.com/politics/index.ssf/2018/02/sens_elizabeth_warren_ed_marke_9.html; New York, <https://www.nytimes.com/2018/02/12/nyregion/puerto-rican-hotels-fema-hurricane-maria.html>; Florida, <http://www.orlandosentinel.com/news/puerto-rico-hurricane-recovery/os-fema-housing-direct-lease-evacueespuerto-rico-20180213-story.html>

Work with HUD to Activate a Disaster Housing Assistance Program (DHAP)-like Program to provide longer-term housing assistance to low-income households.

Developed from the hard-won lessons of Hurricane Katrina, the Disaster Housing Assistance Program (DHAP) has been used to great effect by both Democratic and Republican administrations, providing longer-term housing assistance and wrap-around services to low-income survivors immediately after a disaster. Program services are provided by local housing professionals with extensive knowledge of the local housing market. This assistance helps families find permanent housing solutions, secure employment, and connect to public benefits.

Despite of this successful track record, FEMA has refused to activate the program under the most recent administrations, relying instead on the TSA program and other FEMA and state administered disaster housing programs inaccessible to many low-income disaster survivors.²³ Although FEMA has claimed that these programs are more efficient and cost-effective than DHAP, there is no evidence to support such as position. In fact, a report from the Government Accountability Office (GAO) explicitly stated that it was impossible to assess this claim because the information needed to compare DHAP's effectiveness with other FEMA programs was not collected by the agency. However, that same report found that DHAP provided disaster survivors with as much as 17% more assistance than other FEMA programs.²⁴

FEMA should work with HUD to activate a DHAP-like program after every disaster to ensure that the lowest-income survivors receive stable, longer-term housing.

FEMA's Lack of Transparency

Lack of transparency at FEMA prevents analysis of how the agency may be perpetuating barriers to opportunity and benefits for people of color and other underserved groups. Useful outcome data (i.e., information on how well a recovery program is working) is often not made publicly available for many FEMA programs. Although FEMA does report the number of applications approved and the amount of funding dispersed, it often does not make public information on many applicants were denied assistance and for what reasons. FEMA does not track how program participants fare after leaving the program or later in the disaster recovery process. The information that is released is often not provided at a small enough geographic level to be useful for many academic or public policy researchers. In addition, FEMA often does not compile or release information on race, disability, or other subpopulations regarding its programs. A recent National Advisory Council (NAC) report released last year stated that the while FEMA maintains some publicly available databases, they were "limited in scope and are more output than outcome focused."²⁵

²³ Elizabeth Webster, "Disaster Housing Assistance: Homeland Security Issues in the 116th Congress", Congressional Research Service, 2019, Available at: <https://fas.org/sgp/crs/homsec/IN11054.pdf>

²⁴ Government Accountability Office, "Disaster Housing: Improved Cost Data and Guidance Would Aid FEMA Activation Decision" (2020), Available at: <https://www.gao.gov/assets/720/711255.pdf>

²⁵ FEMA, National Advisory Council 2020 Report, Available at: https://www.fema.gov/sites/default/files/documents/fema_nac-report_11-2020.pdf

The lack of data transparency has broad impacts. Data from FEMA's IA program are frequently used to shape long-term rebuilding efforts. Preventing access to that data also hinders the analysis of disaster programs implemented by states and other federal agencies.

Make data publicly available to ensure greater racial, income, and accessibility equity.

OpenFEMA – a data sharing initiative - was originally designed to allow researchers, academic institutions, and the general public to access disaster recovery information. The program itself has fallen by the wayside and remained inactive for several years. By resurrecting the program, policymakers, researchers, and advocates could better identify where FEMA programs are being implemented most effectively and what populations are having trouble fully recovering.

Data should be made publicly available and be disaggregated by protected class and on as granular a geographic area as possible.

Make personally identifiable information available to vetted and trusted academic and research institutions.

By allowing vetted institutions access to such data, their assessments and research can provide valuable insights into how to improve programs while ensuring data is protected.

Many agencies maintain relationships with large academic and research institutions that regularly research topics related to their missions. Such data contains personally identifiable but anonymized data to assist in deeper understanding of long-term patterns. Because of its sensitive nature, agencies and academic and research institutions maintain strict security and monitoring agreements to prevent the unauthorized data releases. In fact, many institutions have developed infrastructure meeting the highest levels of security demanded by the federal government in order to maintain consistent access. Despite requests for data sharing agreements, FEMA has historically prevented access to data, even if an institution has similar agreements with additional agencies and a proven track record of keeping sensitive information secure.

FEMA must create a mechanism to securely share data with academic and research institutions. The research conducted with the data will have far reaching consequences on how the country responds to, recovers from, and mitigates disasters, and allow us to even further determine where federal programs are leaving disaster survivors behind.

Conclusion

Our country must develop a new disaster housing recovery system that centers the housing needs of the lowest-income survivors, including people of color, people with disabilities, and others. In addition to addressing immediate housing needs caused by the pandemic, FEMA must address our nation's pervasive structural and racial inequities and reform federal disaster planning and response efforts to be inclusive and intersectional. We must reform existing programs by centering racial equity and equity for all historically marginalized people to ensure that affordable housing investments and federal disaster recovery resources reach all impacted households.