

Date: September 28, 2017

To: The Honorable William B. "Brock" Long  
Administrator, Federal Emergency Management Agency (FEMA)  
500 C Street, SW, Washington, DC 2002

From: Hurricane Housing Recovery Coalition C/O National Low Income Housing Coalition  
1000 Vermont Avenue NW, Suite 500, Washington, DC 20005

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To Administrator Long:

We, the undersigned 513 organizations and local governments, write as part of a Hurricane Housing Recovery Coalition to express our commitment to ensuring that federal housing recovery and rebuilding efforts are complete and equitable for all individuals and communities impacted by the devastation caused by Hurricanes Harvey, Irma and Maria. We represent national, state, and local organizations, including many working directly with impacted communities in Texas, Florida, Louisiana, Georgia, Puerto Rico and the Virgin Islands and with first-hand experience recovering after prior disasters. As you work to administer federal disaster relief, we urge you to make certain that federal disaster recovery resources reach all impacted households, including those with the lowest incomes who are often the hardest-hit by disasters and have the fewest resources to recover afterwards.

While the road ahead for recovery after Hurricanes Harvey, Irma and Maria will take many years, there are a number of steps FEMA can take now to jumpstart the recovery and assist low income households and communities.

Our recommendations (enclosed) include:

- Taking immediate steps to establish coordination with other federal agencies, including entering into a mission agreement with the Department of Housing and Urban Development (HUD), directing HUD to stand up a Disaster Housing Assistance Program to administer a disaster voucher program;
- Allocating resources fairly and adequately to meet the needs of homeowners, renters, and people experiencing homelessness based on the greatest unmet housing and infrastructure needs after the disaster;
- Protecting displaced individuals from discrimination and helping to speed recovery efforts;
- Improving transportation assistance programs;
- Protecting against future disasters; and
- Issuing guidance reaffirming that all federal wage, hour, and worksite safety protections are in place and are enforceable.

Thank you for your attention and consideration of these recommendations. Members of the Hurricane Housing Recovery Coalition will follow up soon to discuss these recommendations in more detail.

Sincerely,

## **National Organizations**

American Baptist Home Mission Societies  
Autistic Self Advocacy Network  
B'nai B'rith International  
Catholic Charities USA  
Center for American Progress  
Center for Community Change  
Center for Popular Democracy  
Center on Budget and Policy Priorities  
Chemung County Housing Coalition  
Children's Health Watch  
Coalition on Human Needs  
Congregation of Our Lady of Charity of the Good Shepherd, US Provinces  
Consortium For Citizens With Disabilities Housing Task Force  
Consumer Action  
Corporation for Supportive Housing  
Council For Health & Human Service Ministries, United Church Of Christ  
Demand Progress  
Elevate Energy  
Elliott & Sugarman  
Enterprise Community Partners  
Equal Rights Center  
Evangelical Lutheran Church In America  
Evangelical Lutheran Good Samaritan Society  
Feeding America  
Funders Together To End Homelessness  
Grounded Solutions Network  
Habitat For Humanity International  
Holy Spirit Missionary Sisters, USA-JPIC  
HomeFree-USA  
Housing Advisory Group  
Housing Assistance Council  
Housing Partnership Network  
Housing Up  
Islamic Society Of North America  
Lawyers Committee for Civil Rights Under Law  
LeadingAge  
Local Initiatives Support Corporation  
LOCUS: Responsible Real Estate Developers And Investors  
Lutheran Services in America Disability Network  
Make Room  
Mercy Housing, Inc.  
Mercy Loan Fund

Michigan Historic Preservation Network  
NAACP  
NAACP Legal Defense and Educational Fund, Inc.  
NASTAD  
National Advocacy, Center of the Sisters of the Good Shepherd  
National Affordable Housing Management Association  
National AIDS Housing Coalition  
National Alliance Of Community Economic Development Associations  
National Alliance of HUD Tenants  
National Alliance on Mental Illness  
National Alliance to End Homelessness  
National Association For County Community And Economic Development  
National Association for Latino Community Asset Builders  
National Association of Affordable Housing Lenders  
National Association of Local Housing Finance Agencies  
National Association of Neighborhoods  
National Association of the Deaf  
National CAPACD  
National Center for Healthy Housing  
National Center For Transgender Equality  
National Church Residences  
National Coalition for the Homeless  
National Community Development Association  
National Community Reinvestment Coalition  
National Community Stabilization Trust  
National Congress for Community Economic Development  
National Consumer Law Center  
National Council of Jewish Women  
National Council On Independent Living  
National Development Council  
National Disability Rights Network  
National Domestic Violence Hotline  
National Fair Housing Alliance  
National Health Care For The Homeless Council  
National Housing & Rehabilitation Association  
National Housing Conference  
National Housing Institute  
National Housing Law Project  
National Housing Resource Center  
National Housing Trust  
National Housing Trust - Enterprise Preservation Corporation  
National Law Center on Homelessness & Poverty  
National Leased Housing Association

National LGBTQ Task Force Action Fund  
National Low Income Housing Coalition  
National Low Income Housing Policy Center  
National Network to End Domestic Violence  
National Urban League  
Neighborworks Capital  
NETWORK Lobby for Catholic Social Justice  
Oxfam America  
Pathstone Corporation  
Policylink  
Portlight Inclusive Disaster Strategies  
Poverty & Race Research Action Council  
Presbyterian Church (U.S.A.) Office of Public Witness  
Preservation Of Affordable Housing, Inc.  
Prosperity Now  
Provincial Council Clerics of St. Viator  
Rebuilding Together  
Right To The City Alliance  
Rural Community Assistance Corporation  
Sargent Shriver National Center on Poverty Law  
Smart Growth America  
Stewards Of Affordable Housing For The Future  
Technical Assistance Collaborative  
The Arc of the United States  
The Jewish Federations Of North America  
The NHP Foundation  
The Sharing Community, Inc.  
Universal Living Wage  
Volunteers Of America  
Xaverian Brothers

**Florida Organizations and Local Governments**

Affordable Homeownership Foundation, Inc.  
Alachua Habitat For Humanity  
Beautiful Safe Beginnings  
Bonita Bestcs  
Catalyst Miami  
Central Florida Community Action Agency  
Centro De Ayuda Hispana DbA American Help Center  
City of Pompano Beach, Florida  
Collier Resource Center, Inc.  
Community Redevelopment Associates of Florida, Inc.

De Hostos Senior Center, Inc.  
Dr. Arthur Boyer Foundation, Inc.  
First Community Christian Pentecostal Church of God  
Florida Alliance for Assistance Services and Technology  
Florida Alliance of Community Development Corporations, Inc.  
Florida Asian Services Center  
Florida Housing Coalition  
Florida Southwestern State  
Florida Student Power Network  
Good Neighbor Society  
Grace And Truth Community Development Corporation  
H.O.M.E.S., Inc.  
Habitat For Humanity of Hardee  
Habitat For Humanity Of Pinellas City  
Hallisky & Davis  
Housing Authority of the City of Fort Myers  
Housing Opportunities Project for Excellence, Inc.  
Indian Horizon Of Florida  
Jacksonville Area Legal Aid, Inc.  
Jessie Ball Dupont Fund  
Lakeland Habitat For Humanity  
Latino Leadership, Inc.  
Lee County Development Corporation  
Lee County Homeless Coalition  
Meals on Wheels South Florida  
Metro North Community Development Corporation  
Miami Homes For All  
NANAY Community Economic Development Corporation  
New Florida Majority  
New Horizons Of The Treasure Coast  
New Smyrna Beach Housing Authority  
Organize Florida  
Pahokee Housing Authority  
Personal Growth Center  
Pro Source Real Estate And Property Service  
Rebuilding Together Miami-Dade  
Religious Of The Sacred Heart Of Mary  
South Florida Board of Realtists  
South Florida Community Development Coalition  
St. Johns Housing  
St. Petersburg Neighborhood Housing Services, Inc.  
Tallahassee Housing Authority  
Tayan Alliances Inc

The Farmworker Association of Florida, Inc.  
United Way South Sarasota County  
Wealth Watchers Inc.  
Winter Haven Housing Authority  
Youth and Family Alternatives, Inc.

### **Texas Organizations and Local Governments**

Accessible Housing Austin!  
Accessible Housing Resources, Inc.  
Advocacy Outreach  
Atlantic Housing Foundation, Inc.  
Austin Community Design & Development Center  
Austin Habitat for Humanity  
Austin Housing Coalition  
Austin Tenants Council  
Career and Recovery Resources  
Center For Transforming Lives  
City of Amarillo, Texas  
City of Beaumont, Texas  
City of Galveston, Texas  
City of Garland, Texas  
City of McAllen, Texas  
City of Pasadena, Texas  
City of Plano, Texas  
Coalition For The Homeless of Houston/Harris County  
County of Hidalgo, Texas  
Covenant Community Capital  
Del Rio Housing Authority  
Dental Health Arlington  
Greater Houston Fair Housing Center  
Guadalupe Neighborhood Development Corporation  
House the Homeless Inc.  
Houston Center For Independent Living  
Houston Housing Authority  
I Am Pleased Development Center  
La Union Del Pueblo Entero  
Meals On Wheels of Tarrant County  
Meals on Wheels Texas  
Mid-Coast Family Services  
NAMI - Abilene  
Neighborworks Laredo  
North Texas Fair Housing Center

Project LIFT  
 Proyecto Azteca  
 RAISE Texas  
 Rebekah Baines Johnson Center  
 San Antonio Coalition For Veterans And Families  
 Texas Affiliation of Affordable Housing Providers  
 Texas Appleseed  
 Texas Association of Community Development Corporations  
 Texas Homeless Network  
 Texas Housers  
 Texas Tenants' Union  
 True Casa Consulting LLC  
 Volunteers of America- Texas  
 Waco Community Development  
 Waco Housing Authority

**Other State Organizations and Local Governments**

Center for Fair Housing	Alabama
Central Alabama Fair Housing Center	Alabama
City of Florence	Alabama
Community Service Programs of West Alabama, Inc.	Alabama
Fair Housing Center of Northern Alabama	Alabama
Alaska Community Development Corporation	Alaska
Sitka Community Land Trust	Alaska
Ability360	Arizona
Southwest Fair Housing Council	Arizona
Arizona Housing Coalition	Arkansas
Association of Programs for Rural Independent Living	Arkansas
City of Fort Smith	Arkansas
Housing Authority of Star City	Arkansas
Abode Communities	California
Age Well Senior Services, Inc.	California
Asian Pacific Institute on Gender-Based Violence	California
California Homeless Youth Project	California
CarsonWatch	California
Colchester Creek	California
Disability Rights Education & Defense Fund	California
EAH Housing	California
Fair Housing Advocates of Northern California	California
Fair Housing Council of Orange County	California
Fair Housing Council of Riverside County, Inc.	California

Fair Housing Council of the San Fernando Valley	California
Greater Napa Valley Fair Housing Center	California
Housing Rights Center	California
Inland Fair Housing and Mediation Board	California
Oakland Tenants Union	California
Orange County United Way	California
Project Sentinel	California
Sacramento Regional Coalition to End Homelessness	California
US Vets Homeless Feeding & Housing Services	California
Voces Verdes	California
Western Center on Law and Poverty	California
American Planning Association, Colorado Chapter	Colorado
Colorado Coalition For The Homeless	Colorado
Community Restoration Partners, LLC	Colorado
Denver Metro Fair Housing Center	Colorado
Denver Relief Consulting	Colorado
Habitat for Humanity of Pueblo	Colorado
Spector and Associates	Colorado
Connecticut Fair Housing Center	Connecticut
Connecticut Housing Coalition	Connecticut
Connecticut Legal Rights Project	Connecticut
Housing Development Fund	Connecticut
DC Coalition Against Domestic Violence	DC
North Capitol at Plymouth/Retirement Housing Foundation	DC
Better Homes of Seaford, Inc.	Delaware
HerStory Ensemble	Delaware
Housing Opportunities of Northern Delaware, Inc.	Delaware
Community Outreach Training Center, Inc.	Georgia
Fuller Center for Housing	Georgia
Georgia Advancing Communities Together	Georgia
Georgia Coalition Against Domestic Violence	Georgia
JCVision and Associates, Inc.	Georgia
Metro Atlanta Task Force for the Homeless, Inc.	Georgia
Metro Fair Housing Services, Inc.	Georgia
Our Fine Arts, Inc.	Georgia
Poz Military Veterans USA	Georgia
Savannah-Chatham County Fair Housing Council, Inc.	Georgia
Standup For Kids	Georgia
The CHOW Project	Hawaii
City of Nampa, Idaho	Idaho
Intermountain Fair Housing Council	Idaho
Living Independence Network Corporation	Idaho
South Central Community Action Partnership	Idaho



Access Living of Metropolitan Chicago	Illinois
Aurora Housing Authority	Illinois
Chicago Area Fair Housing Alliance	Illinois
CK and Associates	Illinois
Hispanic Housing Development Corporation	Illinois
HOPE Fair Housing Center	Illinois
Housing Action Illinois	Illinois
Housing Choice Partners	Illinois
Latin United Community Housing Association	Illinois
Open Communities	Illinois
Park Ridge Housing Initiative	Illinois
South Suburban Housing Center	Illinois
The Resurrection Project	Illinois
Valerie S. Kretchmer Associates, Inc.	Illinois
Bridges to Leadership, Inc.	Indiana
Fair Housing Center of Central Indiana	Indiana
God's Helping Hand	Indiana
Habitat for Humanity of Elkhart County	Indiana
Lake County, IN Department of Community Economic Development	Indiana
Unified Government of Wyandotte County/Kansas City	Kansas
First World Architects Studio	Kentucky
Stephanie Sweeney & Associates, LLC	Kentucky
Blueprints Consulting	Louisiana
EXP Realty LLC	Louisiana
GL Realty Group LLC	Louisiana
Greater New Orleans Fair Housing Action Center	Louisiana
Greater New Orleans Housing Alliance	Louisiana
Lower 9th Ward Homeownership Association	Louisiana
Mental Health America of Louisiana	Louisiana
Providence Community Housing	Louisiana
Re/Max First	Louisiana
Avesta Housing	Maine
Coastal Enterprises, Inc.	Maine
Freeport Housing Trust	Maine
Maine Affordable Housing Coalition	Maine
Advocacy and Training Center	Maryland
African American Health Alliance	Maryland
Alabaster	Maryland
Asian-American Homeownership Counseling, Inc.	Maryland
Baltimore Neighborhoods, Inc.	Maryland
Coalition Homes, Inc.	Maryland
Du & Associates, Inc.	Maryland

Maryland Affordable Housing Coalition	Maryland
Montgomery Housing Partnership	Maryland
Partnership for Inclusive Disaster Strategies	Maryland
Racial and Ethnic Health Disparities Coalition	Maryland
Swift, Thomas & Kemp Development Group, Inc.	Maryland
The Cave Institute	Maryland
Birch Island Real Estate Consulting LLC	Massachusetts
CohnReznick	Massachusetts
Corcoran Jennison Management LLC	Massachusetts
Homes for Families	Massachusetts
Massachusetts Fair Housing Center	Massachusetts
Massachusetts YouthBuild Coalition	Massachusetts
Montgomery County Coalition for the Homeless	Massachusetts
Natural Hazard Mitigation Association	Massachusetts
RoundStone Group	Massachusetts
The North Shore Moving Market	Massachusetts
Uniting Citizens for Affordable Housing in Newton	Massachusetts
Financial Justice Coalition	Michigan
Habitat for Humanity Northeast Michigan	Michigan
Michigan Community Reinvestment Coalition	Michigan
Michigan State University - College of Law - Housing Law Clinic	Michigan
Casa de Esperanza: National Latin@ Network for Healthy Families and Communities	
Integrated Community Solutions, Inc.	Minnesota
Metropolitan Fair Housing Council of Oklahoma, Inc.	Minnesota
Metropolitan Interfaith Council on Affordable Housing	Minnesota
Minnesota Housing Partnership	Minnesota
Our Spring Lake Store LLC	Minnesota
Better Family Life, Inc.	Missouri
Empower Missouri	Missouri
Greater KC Housing Information Center	Missouri
ADAPT Montana	Montana
Friend Housing Authority	Nebraska
Sisters of Mercy West Midwest Justice Team	Nebraska
ACTIONN	Nevada
Advocates for Peace and Social Justice	New Jersey
Consumer Credit and Budget Counseling, Inc.	New Jersey
Fair Share Housing Center of New Jersey	New Jersey
Housing Community Development Network of New Jersey	New Jersey
Jersey City Office of Community Development	New Jersey
Monarch Housing Associates	New Jersey
New Jersey Association on Correction	New Jersey

New Jersey Tenants Organization	New Jersey
New Mexico Coalition To End Homelessness	New Mexico
Ali Forney Center	New York
Alliance Against Homeless of Bergen County, Inc.	New York
Alternatives Federal Credit Union	New York
Arbor Housing And Development	New York
ARC Foundation, Inc.	New York
Carroll Gardens Association	New York
Center For New York City Neighborhoods	New York
Central Oklahoma Commercial Association of REALTORS	New York
Central Park Gardens Tenants' Association	New York
Chhaya Community Development Corporation	New York
CLUSTER Community Services	New York
CNY Fair Housing	New York
Coalition for the Homeless	New York
Columba Kavanagh House, Inc.	New York
Community Access	New York
Community Development Futures, LLC	New York
Community League of the Heights	New York
Community Solutions	New York
Continuum of Care, Mount Vernon New York	New York
Coordinated Care Services, Inc.	New York
Disabled in Action of Greater Syracuse Inc.	New York
Empire Justice Center	New York
Fair Housing Justice Center, Inc.	New York
Flatbush Development Corporation	New York
Fordham Bedford Housing Corporation	New York
Geel Community Services, Inc.	New York
Good Shepherd Services	New York
Habitat for Humanity New York City	New York
Habitat for Humanity of Tompkins & Cortland Counties	New York
Hellenic American Neighborhood Action Committee	New York
Housing Help, Inc.	New York
Hudson River Housing, Inc.	New York
Human Development Services of Westchester	New York
Independent Living Center of the Hudson Vallie, Inc.	New York
Lantern Community Services	New York
Local Initiatives Support Corporation- New York City	New York
Long Island Housing Services, Inc.	New York
Make the Road New York	New York
Mohawk Valley Housing and Homeless Coalition	New York
Morningside Heights Multi-Cultural Tenants Organization	New York
NAACP Mid-Manhattan Branch	New York

Neighborhood Housing Services of Jamaica, Inc.	New York
Neighborhood Preservation Coalition of New York State, Inc.	New York
New York Association on Independent Living	New York
New York Housing Conference	New York
New York State Homes and Community Renewal	New York
New York State Rural Advocates, Inc.	New York
New York State Tenants & Neighbors Coalition	New York
Newburgh Housing Authority	New York
Northeast Hawley Development Association, Inc.	New York
Program Design and Development LLC	New York
Project Hospitality	New York
Public Housing Communities, Inc.	New York
Rensselaer County Housing Resources	New York
Rensselaer Housing Authority	New York
Resource Center for Independent Living, Inc.	New York
RUPCO	New York
Rural Housing Opportunities Corporation	New York
Rutgers Resident Council	New York
South Country Community Land Trust	New York
Southern Tier Independence Center	New York
Southside United HDFC	New York
Southside United Housing Development Corporation	New York
Supportive Housing Network Of New York	New York
The Guidance Center of Westchester	New York
The Housing Council at PathStone, Inc.	New York
Troy Rehabilitation and Improvement Program	New York
Westgate Tenants Association @ Stonehenge Village	New York
YWCA of Rochester and Monroe County	New York
YWCA of Syracuse and Onondaga County, Inc.	New York
YWCA of the Greater Capital Region	New York
Financial Pathways of the Piedmont	North Carolina
Housing Authority of the City of High Point	North Carolina
North Carolina Housing Coalition	North Carolina
Wilson Area Habitat for Humanity	North Carolina
Minot Area Home Coalition	North Dakota
Affordable Housing Alliance of Central Ohio	Ohio
Barbara Poppe and Associates	Ohio
Central Ohio Fair Housing Association	Ohio
Cleveland Tenants Organization	Ohio
Fair Housing Advocates Association	Ohio
Fair Housing Center of Toledo	Ohio
Fair Housing Resource Center, Inc.	Ohio
Housing Research & Advocacy Center	Ohio

Miami Valley Fair Housing Center, Inc.	Ohio
The Partnership Center	Ohio
YMCA of Columbus	Ohio
Baker Schonchin Holdings Corporation	Oregon
Northwest Consumer Affairs	Oregon
ROSE Community Development	Oregon
Catholic Social Services	Pennsylvania
Housing Equality Center of Pennsylvania	Pennsylvania
Integra Home Counseling, Inc.	Pennsylvania
National Resource Center on Domestic Violence	Pennsylvania
Nazareth Housing Services	Pennsylvania
Pennsylvania Association of Housing & Redevelopment Agencies	Pennsylvania
Scranton Counseling Center	Pennsylvania
Uptown Partners of Pittsburgh	Pennsylvania
HousingWorks RI	Rhode Island
County of Lexington SC Department of Community Development	South Carolina
Development Steps	South Carolina
Erwin Housing Authority	Tennessee
GAP Community Development Resources	Tennessee
New Level Community Development Corporation	Tennessee
Shield, Inc.	Tennessee
Housing Channel	Texas
Crossroads Urban Center	Utah
Salt Lake City County Continuum of Care	Utah
Salt Lake Homeless Coordinating Council	Utah
Utah Housing Coalition	Utah
Housing Vermont	Vermont
Randolph Area Community Development Corporation	Vermont
RuralEdge	Vermont
Vermont Affordable Housing Coalition	Vermont
Community Housing Partners	Virginia
Farmville Area Habitat for Humanity, Inc.	Virginia
Habitat for Humanity Virginia	Virginia
Housing Opportunities Made Equal of Virginia	Virginia
Piedmont Housing Alliance	Virginia
Virginia Housing Alliance	Virginia
Catholic Charities Housing Services	Washington
Fair Housing Center of Washington	Washington
Gethsemane Lutheran Church	Washington
Greenfield Institute	Washington
Homeward Bound Community Land Trust	Washington

OPAL Community Land Trust	Washington
Seattle/King County Coalition on Homelessness	Washington
Washington Low Income Housing Alliance	Washington
Whatcom Skagit Housing	Washington
Central Appalachia Empowerment Zone of West Virginia	West Virginia
Mountain Hospice, Inc.	West Virginia
Affordable Housing Action Alliance	Wisconsin
Commonwealth Development Corporation	Wisconsin
Hirsch Group Architecture	Wisconsin
IndependenceFirst	Wisconsin
Wisconsin Coalition of Independent Living Centers	Wisconsin
Wisconsin Partnership for Housing Development	Wisconsin
Wyoming Coalition for the Homeless	Wyoming

## **Federal Emergency Management Agency Housing Recovery Policy Recommendations**

### **FEMA Should:**

1. Take immediate actions to establish coordination with other federal agencies, including:
  - a. Quickly entering into a Mission Agreement with the Department of Housing and Urban Development (HUD), directing HUD to stand up a Disaster Housing Assistance Program to administer a disaster voucher program (DVP);
  - b. Entering into an interagency agreement with the Small Business Administration (SBA) and HUD to ensure all three agencies share information and avoid duplication of benefits, including housing recovery and disaster remediation resources. For example, efforts to elevate homes with FEMA mitigation grants should occur before Community Development Block Grant – Disaster Recovery (CDBG-DR) funding is used to reconstruct or rehabilitate homes. FEMA should not, however, let extended interagency negotiations hold up disaster relief and rebuilding efforts;
  - c. Protecting survivors, volunteers, and paid workers engaged in recovery efforts from exposure to environmental health and safety hazards and communicating with them about the health and safety hazards involved in cleanup work; and
  - d. Protecting renters living in uninhabitable apartments caused by unnecessary delays by property owners. FEMA should consider ways to provide immediate, emergency rehabilitation to properties where tenants are at high health and safety risks and to determine proper cost-sharing with the property owner afterwards.
2. Allocate FEMA resources fairly and adequately to meet the needs of homeowners, renters, and people experiencing homelessness based on the greatest unmet housing and infrastructure needs after the disaster by:
  - a. Collecting comprehensive demographic data on the impact of the disaster and federal recovery efforts and making this data available to the public. Demographic data should include all protected classes covered by the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights protections, including, but not limited to race/ethnicity, income, age, disability, and gender, as well as housing tenure of the individual and location at a granular basis to enable meaningful analysis.

- b. Surveying impacted neighborhoods on disaster and social neighborhood vulnerability, including all protected classes covered by the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights protections, including, but not limited to economic status, race/ethnicity, gender, disability, education, and age, as well as transportation dependence. Survey results should be made available to the public.
  - c. Using existing processes and applications to avoid adding cost or time, whenever possible.
3. Protect displaced individuals from discrimination and help speed recovery efforts by:
- a. Ensuring that people experiencing homelessness prior to a disaster are eligible for the same emergency shelter and housing recovery resources available to impacted renters;
  - b. Requiring FEMA grantees to stop passing or enforcing laws which criminalize people experiencing homelessness for self-sheltering or conducting other life-sustaining behaviors in public places when there are inadequate alternatives;
  - c. Enforcing federal fair housing laws on FEMA's Housing Portal or any other website or resource to which FEMA may refer people seeking housing. FEMA should bar landlords from publishing discriminatory advertisements for rental properties. After past disasters, FEMA's Housing Portal and other websites to which FEMA's website linked included explicitly discriminatory advertisements that violated federal and state fair housing laws.
  - d. Providing guidance and ensuring compliance with non-discrimination laws, including the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights laws, for all entities administering or receiving housing resources in order to ensure fairness and avoid delays due to enforcement actions;
  - e. Working with HUD to provide timely, actionable fair housing guidance and training to FEMA staff or contractors who handle housing-related inquiries from the public;
  - f. Working with HUD to develop a Memorandum of Understanding (MOU) outlining a process to refer, investigate, and resolve discrimination complaints that arise from property owners or residents receiving housing assistance;



- g. Ensuring that any information provided directly or indirectly by FEMA about housing resources for people displaced by the storm complies with fair housing requirements; and
  - h. Basing grant amounts on the cost to replace or repair damaged property rather than property values to help close financing gaps and to protect households that live in neighborhoods where property values are less than the cost of repairs and replacement.
4. Improve transportation assistance programs by:
- a. Providing resources to help displaced households without access to cars afford their increased transportation costs. FEMA should help cover the costs of Uber/Lyft, connector buses, and public transportation.
  - b. Increasing the maximum funds available to repair or replace a single parcel vehicle from \$5000 to \$10,000. Alternatively, FEMA should permit disaster survivors to enter into reimbursable short-term auto leases; and
  - c. Increasing the maximum level of personal transportation assistance in cases where the surviving household can demonstrate the need for two personal vehicles to accommodate transportation to and from places of employment.
5. Protect against future disasters by:
- a. Coordinating with HUD to help state and local governments develop a long-term disaster recovery/mitigation plan, with opportunities for public input. These plans should be made available to the public;
  - b. Revising flood hazard maps to reflect recurring, major flooding in recent years and making these maps publicly available;
  - c. Defining a base-level standard of public infrastructure for neighborhood safety and survivability and providing remedial local infrastructure for neighborhoods with inadequate levels of storm water protection. FEMA should explore equitable disaster deductible concepts to help balance federal, state, local obligations; and
  - d. Providing all individuals with the ability to relocate away from flood hazards, environmental hazards, and environmentally blighted neighborhoods.
6. Issue guidance reaffirming that all federal wage, hour, and worksite safety protections are in place and are enforceable.

For More Information, contact Diane Yentel, NLIHC President and CEO ([dyentel@nlihc.org](mailto:dyentel@nlihc.org)) or Sarah Mickelson, NLIHC Public Policy Director ([smickelson@nlihc.org](mailto:smickelson@nlihc.org)).