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 Arizona
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
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
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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
Utah Housing Coalition  Utah
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
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<td>Affordable Housing Action Alliance</td>
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<td>Wyoming Coalition for the Homeless</td>
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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) or Sarah Mickelson, NLIHC Public Policy Director (smickelson@nlihc.org).