

TO: Federal Emergency Management Agency (FEMA)
National Integration Center

FROM: State of Louisiana
Governor's Office of Homeland Security and Emergency Preparedness
Office of Community Development

State of North Carolina
Department of Health and Human Services

City of Houston
Housing and Community Development Department
Office of Emergency Management

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RE: Feedback on *Planning Considerations: Disaster Housing* (draft)

Thank you for the opportunity to comment on FEMA's draft document *Planning Considerations: Disaster Housing*. Each of our jurisdictions has experienced repeated flooding events in recent years and our offices have developed significant expertise in post-disaster housing needs. We appreciate FEMA's leadership in developing this document and will use it in our future planning processes.

We have six recommendations to strengthen the document and highlight strategies that may be resources for others as they prepare and plan for post-disaster housing needs:

1. Highlight Post-Disaster Rapid Rehousing as an Option for Jurisdictions

Our jurisdictions have experience using the "housing phases" model presented on pages 5 – 9, as well as using a post-disaster rapid rehousing model. We encourage FEMA to explore additional models beyond housing phases, especially the rapid rehousing model.

In our experience, the "interim" housing phase can extend not just to months, but into years. For example, Louisiana currently has 22 households still living in mobile housing units more than three years after the 2016 floods. The uncertainty about the length of the interim phase can increase costs and logistical burdens on jurisdictions and FEMA to maintain temporary housing for such long periods of time.

Houston and North Carolina recently piloted a post-disaster rapid rehousing model in response to Hurricanes Harvey and Florence in 2017 and 2018, respectively. In this model, residents transitioned directly from shelters into long-term, sustainable housing. Houston documented the approach in its *Housing For Harvey* report, available at <https://recovery.houstontx.gov/wp->

<content/uploads/2019/04/Housing-for-Harvey-FINAL-3.pdf>. The effort rehoused 267 individuals into an alternative residential environment and 334 households into scattered site apartments with long-term rental subsidies.

Following Hurricane Florence, North Carolina launched Back@Home NC, a state-funded rapid-rehousing intervention that connects individuals and families displaced by the hurricane to resources, services, and permanent housing to prevent homelessness and create stability and long-term stability for the state's most vulnerable hurricane survivors. As of October 15, 2019, 13 months since the storm, Back@Home has housed 1,007 individuals (462 households) across the 28 disaster-impacted counties. Back@Home has housed 53% of households within 45 days of enrollment and over 90% positive exits.

The rapid rehousing model has many benefits, especially for survivors who were precariously housed before the disaster. Sixty-seven percent of rehoused households in Houston had previously experienced homelessness or housing instability. Many households in the program were ineligible for FEMA assistance because they were not leaseholders prior to the disaster.

We note that in Houston and North Carolina, this model presented challenges for already-taxed homelessness systems. It is important for jurisdictions to include the continuum of care in their disaster housing plans and to bolster the system in non-disaster times.

2. Identify Precariously Housed Households as an At-risk Population

The document identifies individuals with access and functional needs, homeless populations, incarcerated individuals, and nursing and senior facilities as groups that require special considerations in planning efforts on pages 12 – 14. We would like to see a category of “Precariously Housed Households” added as a group requiring special consideration.

After major disasters, significant effort is required to address the needs of households who were not technically homeless before the disaster event, but who were living doubled up with friends or relatives. Households in this group are not usually eligible for federal assistance because they do not hold leases or have permanent addresses. In addition, their housing is most likely to fall through as friends or relatives address their own post-disaster housing needs.

Solutions to address the needs of precariously housed households will also come from the homelessness system in a region. Ensuring that homelessness systems are strong in non-disaster times is essential for success in addressing the needs of this population during a disaster.

3. Add Specificity around Case Management

“Wrap-Around Services” are addressed on pages 17 – 18, but case management is not explicitly called out in the document. Establishing a functioning case management system in partnership with FEMA and local non-profits is one of the most challenging tasks for jurisdictions after a

disaster. With a wide network of available resources, survivors require significant help in navigating their options.

Housing navigation services are an important component of case management. As many of the most vulnerable communities displaced by disaster have higher barriers to housing and there is reduced housing stock due to the effects of the storm, housing navigation with strong landlord engagement strategies are key to success.

In addition to providing disaster case management services, planning efforts should recognize that disasters are traumatic events. Traumatic events can cause significant impairment in an individual's functioning and sometimes impair their ability to participate in a recovery program. Lessons learned from previous disasters suggest that case managers have training in Trauma Informed Care.

4. Elevate the Role of Public Education

We are pleased to see the emphasis on Public Information, Outreach, and Preparedness on pages 18 – 19. Residents need information well before a disaster on topics such as having resources on hand for rent and security deposit in case they need to relocate, identifying the limits of their insurance policies, in addition to many others. FEMA can play a leadership role in providing guidance to jurisdictions about the content of pre-disaster messaging campaigns. We also would like to see public education included in the Housing Goals section on pages 2 – 3.

5. Add Data-Sharing as a Major Planning Task

Given the critical role of data and the challenges of data-sharing after a disaster, we would like to see a section on Data Sharing added to the document. In the absence of pre-existing data-sharing agreements with FEMA and non-profit partners, our jurisdictions have faced significant challenges in efficient service delivery after disasters. While the Red Cross plays an important role in sheltering, governments are not able to access their shelter data, which presents serious coordination and service delivery challenges.

Louisiana has developed a unique approach to data sharing that may be a resource for other jurisdictions that we would like to see highlighted in the document.

6. Include Guidance about Data Collection for FEMA Reimbursement

In the height of a disaster event, jurisdictions often do not think about the kinds of data they should be collecting in order to be reimbursed by FEMA in the future. Data collection for FEMA reimbursement should be called out as a planning task in the document, potentially in a new section on data and data sharing.

In Houston after Harvey, FEMA approved a donated resources program that allows volunteer hours and other donated resources, such as office space, to be counted toward local match requirements for FEMA programs. The program was described in Houston Chronicle in August 2018: <https://www.houstonchronicle.com/news/houston-texas/houston/article/FEMA-to-count-volunteer-work-toward-local-match-13164425.php> We would like to see this program highlighted in the document as an option for jurisdictions to consider and plan for.

Thank you for your consideration and we look forward to the next iteration of this important planning document.