




August 26, 2008

MEMORANDUM FOR: R. David Paulison
Administrator

FROM: G. Kemble Bennett 
Chairman
National Advisory Council

SUBJECT: Recommendations on FEMA National Disaster Housing Strategy

The Post Katrina Emergency Management Reform Act requires the Federal Emergency Management Agency (FEMA) to craft a National Disaster Housing Strategy. The Act also requires coordination of the strategy with the National Advisory Council (NAC). FEMA drafted the National Disaster Housing Strategy (NDHS) and released the Draft to the public and the NAC on or about July 17, 2008.

The National Advisory Council's Post Disaster Housing Subcommittee reviewed the NDHS and submitted its input to the full council for approval. The input was proposed as high level guidance statements. During the August 13-14, 2008 meeting in Washington, DC, the full council discussed the statements at length and approved the provision of the following input to FEMA.

Guidance Statements

1. PKEMRA mandated a strategy to address post disaster housing issues, with unclear expectations of the document. While the NDHS is intended to be a broad strategy rather than an operational plan, there is a sense that the difficult issues have been deferred to a newly created National Disaster Housing Task Force.
 - a. The Strategy calls for the Task Force to create the concept of operations and implement solutions. FEMA should provide a clear charge to the Task Force by:
 - i. defining and narrowing its mission,
 - ii. articulating expectations on a concept of operations,
 - iii. specifying timelines for the Task Force's actions, and
 - iv. establishing a reporting mechanism to FEMA for actions/work done by the Task Force.
 - b. The makeup of the Task Force (to be established through the collaboration of FEMA, the Department of Housing and Urban Development (HUD) and the American Red Cross (ARC)), should be more plainly defined to ensure permanent fulltime inclusion of representatives who can reflect the viewpoint of tribal, state and local governments, the private sector and nongovernmental organizations (NGOs).

2. There is a current perception that interim and long-term housing solutions are imposed on communities by FEMA. Per the Strategy, the agency needs to create a collaborative process where state, tribal and local governments are engaged in the process pre- and post-event.
3. The NAC recommends the following Operational Construct for post disaster housing:
 - a. FEMA should provide a menu of post shelter housing options and defined social services for clients.
 - b. The National Disaster Housing Task Force should create this menu with broad input from state, tribal and local governments and the private sector.
 - c. FEMA should vet the options and foster the creation of prototypes.
 - d. FEMA should then provide state/local/tribal officials options for local housing strategies and a list of federally approved contractors.
 - e. State-led task forces, tribal and local governments are strongly encouraged to develop plans and timetables based on selections from this menu of options to address disasters of every size.
 - f. Contrary to the Strategy, where appropriate, State-led housing task forces funded by FEMA should be created to develop local housing strategies pre-event.
 - g. Post disaster housing strategies must address client access to needed wrap around services.
 - h. Case management is currently diffused between voluntary agencies, FEMA, HHS and HUD and needs to be clarified. The National Disaster Housing Task Force should articulate what elements of social support and case management should be provided, with a preference for local resources.
4. The NDHS attempts to clarify roles and responsibilities for individuals, local/state/tribal governments, federal agencies, nongovernmental organizations and the private sector. Recommendations for additional clarification are as follows:
 - a. FEMA:
 - i. FEMA needs to articulate its leadership role in the implementation of this housing strategy.
 - ii. In addition, the Strategy needs to identify FEMA as the leader of the National Disaster Housing Task Force.
 - b. HUD:
 - i. Authorization and responsibility to address long-term housing needs should be clarified between HUD and FEMA.
 - c. Nongovernmental Organizations:
 - i. The Strategy recognizes that voluntary organizations are primarily the housing provider in the emergency phase of a disaster. The draft needs to do more to spell out the resource interdependence of the voluntary sector with tribal, state and local governments.
 - ii. The NDHS needs to acknowledge that mega shelters may be necessary as a tool to address immediate housing needs in large scale events.
 - iii. The Strategy properly identifies three groups of clients who need care: the general population, those with functional needs, and clients with health

issues requiring specialized medical care. Rather than establishing a set of specialized shelters (per the Strategy), the focus should be on the types of clients who need care. The goal should be to accommodate the greatest range of needs and populations at congregate shelters.

- d. Private Sector:
 - i. The National Disaster Housing Task Force should articulate guidelines for outreach and integration of the private sector beyond contracting for housing options (e.g. idea origination, production realities, etc.).
- 5. The National Disaster Housing Task Force should have an advisory committee.
 - a. It is recommended that members of the National Advisory Council's Post Disaster Housing Subcommittee be appointed to participate on this advisory committee (not to represent the NAC, but to provide a link and interface with the subcommittee).