

STATE OF MAINE COMMENTS

3/8/02

Regarding the proposed rule entitled "Disaster Assistance: Federal Assistance to Individuals and Households" Subpart D:

Concern: Sec. 206.101 (j)(ii). With the increased emphasis on volunteer agencies carrying much of the load of recovery assistance, FEMA and ARC need to develop a system to promptly clarify a client's unmet need. If the need cannot be addressed by their programs, it must be forwarded to the Long Term Recovery Committee (or State VOAD if Committee is not activated) where individual agencies can assess their abilities to address the need. The State Individual Assistance Coordinator should be kept aware of this activity in order to note trends of needs and possible additional assistance. Without some process along these lines, all the rhetoric urging volunteerism to bloom will result only in the frustration of those who wanted to help but were not allowed access due to overzealous privacy restrictions and the discouragement of those who were offered assistance, but found that the evaluation of their needs was either the victim of an overwhelming caseload or was judged by a bureaucratic measure rather than a practical one.

Solution: Requests for additional assistance will be recorded by those receiving the formal request. If assistance is not available, the problem without the identifying information will be forwarded to the State Individual Assistance Coordinator and the Long Term Recovery Committee. If a solution is found, the agency that presented the problem can then pursue a release of information for the agency who can provide the service. Upon receipt of the release, the required information can be forwarded to the donor and the relationship between donor agency and applicant can develop.

Concern: Sec. 206.101 (j) (iii) (2): Need definition for "State and local disaster assistance" if it is not the same as "Assistance from other means" (found under 206.102).

Concern: Sec. 206.101 (k) (3) (i) Elimination of the Group Flood Insurance Policy: It has been our experience that non subsidized flood insurance is prohibitive for the majority of people who would qualify for IHP assistance following a disaster in our state. During a period of economic recovery, even a citizen with an average income would have trouble paying the premiums. It can't even be considered by those of low income. Without the group insurance policy previously offered as part of the IFG grant or a similar subsidy program, we are only assuring that these people will never receive assistance again.

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