



National Emergency Management Association

February 15, 2002

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Rules Docket Clerk:

The National Emergency Management Association (NEMA) provides the following comments on behalf of the state emergency management agencies concerning FEMA's proposed rule on Disaster Assistance; Federal Assistance to Individuals and Households. Thank you for the opportunity to review and provide comment.

NEMA canvassed the states for comments and received many excellent and thoughtful views and recommendations. This letter will summarize the viewpoints common among the responding states. Attached you will find copies of each state's individual response as some are state specific and represent unique challenges that need to be addressed.

NEMA supports the ability for states to choose between several options for administration of the program. Many states feel strongly about their role as victim advocate and will want to be actively engaged in providing disaster assistance on behalf of their governors. The proposed rule also provides viable options for those states that seldom experience disasters and therefore do not have the ability to maintain staff capacity to run the program. FEMA is to be commended for developing these series of options that allows states to determine their own level of involvement in administering disaster assistance to victims.

Reference to Section 408(a)(3) limiting temporary housing assistance to 18 months.

Limiting the temporary housing assistance to 18 months without replacing it with a system that provides the applicant with a reasonable alternative will not be helpful to the most difficult cases. Providing a service that counsels the applicant on their options to become self-sufficient after 18 months is advised.

Request for comment on \$5,000 cap on housing repair.

NEMA strongly believes that the \$5,000 cap is too low and is unreasonable in today's economy. We cannot expect individuals and families to recover at that level of assistance.

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Home repair and replacement at \$10,000.

Again, it is unreasonable to think that a home could be replaced for \$10,000 and this inappropriately low cap will result in restrictions for some disaster victims.

Flood Insurance/Elimination of the GFIP.

We do not agree with doing away with the GFIP program. This will place an unreasonable financial burden on the families and may cause them to choose between caring for their families or paying for a flood insurance policy. Most families that are IFG recipients are traditionally lower-income families and do not have the extra dollars to apply toward insurance. The GFIP has been successful in protecting those families from future disasters. Promoting individual responsibility is good, but the GFIP provided a way to give them some time to start paying the premiums themselves. FEMA should stay with the program paying for a three-year policy and then the applicant has to pay for the premiums or become ineligible.

Appeals.

The proposed rule would allow FEMA 90 days to complete an appeal. This is too long a period of time for disaster victims to wait for an answer. Most states handle appeals within 30 – 60 days. NEMA recommends that FEMA do the same.

Many more specific comments are provided in the state responses included in this package. Although not mentioned in the proposed rule, training will be the key to successful implementation of the program and the range of options available for administering the program. We can't state strongly enough that the FEMA regions and the states need thorough and accessible training well in advance of the rule going into effect.

Thank you for the opportunity to comment. We hope you find it useful in efforts to streamline and expedite assistance to victims.

Sincerely,



Ellen Gordon
NEMA Response & Recovery Chair

enclosures