

State of Iowa
Comments on Proposed Rules
44 CFR Part 206

1. Federal register, page 3412--Request for comment "on the tension between the need to consolidate and streamline...and the need to ensure the availability of an active State role in the process..."

The state should remain an active partner in the processing of disaster victims to it's own people. Although the one-stop concept of disaster recovery fits with Iowa's idea of service delivery, there is concern that the quality of service would decrease dramatically if FEMA were the sole delivery source.

In the past, FEMA has not been able to solve problems that delay assistance or cause errors in processing. A single large disaster such as Texas DR overwhelms FEMA and can shut down the entire system for days. If FEMA were to process all the disasters that are going on the entire nation, it will multiply the problems they already have and could paralyze the states in providing any assistance at all the their citizens.

There is concern that if there is not some participation at the state level, the people of our state will become lost in the vast network of all disaster victims. The human touch we as a state provide to the disaster victims will be lost. The people of this state are pleased with the service they are provided and trust the state administered program to be fair, accurate and treat them with dignity.

There should also be some system of accountability or expected standards for FEMA to provide timely disaster assistance and quality in processing defined in the new rule.

2. Federal Register, page 3413--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 some type of service that counsels the applicant on their options to become self-sufficient once the 18 months are up (or sooner of possible) makes more sense.

3. Federal Register, page 3413--Request for public comment on \$5,000 cap on housing repair.

If the goal is for the disaster victim to recover after a disaster, lowering the cap to \$5,000 just does not make sense. It will mean that many families and individuals will not recover, especially in today's economy. This is a decrease from \$10,000 to \$5,000 and is just not enough for a family to repair their home. It is not clear

however, by the way the rule is written, if the applicant will be automatically "rolled over" to the other assistance category after they reach the \$5,000 limit, as they were with the old IFG system and reached the \$10,000. If they are then referred to the new other category, this could be a burden to the state. The state is then required to match with 25% of the cost of the repair. In a big disaster, this could really hurt the state financially. At the very least, it will change the face of the program, more case, and an increase in the average grant award, something the state needs to consider when committing funds.

If the applicant is not referred to the other assistance program after reaching \$5,000 repair, many families will not be able to recover. There is concern they will then be forced on to the state government assistance program or be homeless.

4. Federal Register, page 3413--Request for public comment on the authorization of new construction.

Do not see this as a viable solution except in extreme cases because of the restrictions to eligibility and limited funds. It would only be available to those very remote areas where normal housing is not available. \$10,000 is not enough to provide replacement housing through new construction. A rule of thumb for cost in Iowa to build a home is \$100 per square foot. Assuming they already own the land, this will build a 10X10 building with no heating, plumbing or electricity. This would not provide adequate housing for Iowa's harsh winters and severe storms in the spring.

5. Federal Register, page 3413--Request for public comment on deleting the provision that allows payment of mortgage to disaster victims who, as a result of financial hardship caused by a major disaster, were unable to continue paying their pre-disaster mortgage. This provision makes one less option for those working toward recovery---do not believe that is the correct thing to do.

6. Federal Register, page 3414 - Flood Insurance/Elimination of the GFIP. We agree with the flood insurance requirements and would not want to see them changed. We believe they make the applicants one step closer to true recovery and self-sufficiency.

However, we do not agree with doing away with the program (GFIP) that provides the disaster victim with a 3-year GFIP policy. The new rule does away with the GFIP (Group Flood Insurance Program), but the flood insurance requirements are still attached to the acceptance of a grant award. The cost of the flood insurance policy will be the responsibility of the disaster applicant, who is already financially strapped. This will place a financial an unreasonable burden on the families and may cause them to choose between providing for the well-being of their family or paying a flood insurance policy. Most families that are IFG customers are traditionally lower-income families and simply do not have extra dollars to apply toward insurance. The GFIP has been successful in protecting those families from future disasters. Doing away with the program will mean many families will not be able to pay for their own

insurance and then will not be eligible for federal assistance next disaster, causing many people to suffer both financially and emotionally.

Making them carry some responsibility is good, but the GFIP provided a way to give them some time to start paying the premiums themselves. It should stay with the program paying for a three-year policy and then the applicant has to pay for the premiums after that or become ineligible.

7. **Federal Register, page 34209, Section 206.101. Federal Assistance to Individuals and Households paragraphs (f) and (g) relating to eligibility of individuals who are in arrears of child support.**

We support the current rules that deny them SBA loans, but if their income does not support a loan, they are referred to IFG. The program is designed to help those who have no other means of assistance. Denying them access to IFG would only further penalize the family.

8. **Federal Register, page 3423, Section 206.106 Appeals allows FEMA 90 days to complete an appeal.**

This is too long for a disaster victim to sit in limbo while waiting for an answer to an appeal. For them to move forward in their lives to a place of safety and security they need to know if FEMA is going to help them or not, and they need to know sooner than 90 days. The state does it in 30 days or less, FEMA should provide the same level of service.

9. **Federal Register, page 3424, Section 206.108--Housing Assistance, Paragraph (b) (2) (iv).** See comments in item #3.
10. **Federal Register, page 3424, Section 206.108--Housing Assistance, Paragraph (b) (3) (iv).** See comments in item #4.
11. **Federal Register, page 3416-- Collection of information...State Management Plan for processing other needs assistance.**

It is not necessary to require the state to have both an MOU and a Management Plan for the processing of the program. Only one document was required by the state for administering the IFG Program and should be sufficient for the new program. One or the other would provide the necessary requirements. Requiring both documents places an unnecessary burden on the state and will not add any further results.