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March 11, 2002

Rules Docket Clerk
Office of the General Counsel
Federal Emergency Management Agency
Room 840
500 C Street, SW
Washington, DC 20472

111 Park Place
Falls Church, VA
22046-4513

Subject: 44 CFR Part 206, RIN 3067-AD25, Disaster Assistance; Federal Assistance to Individuals and Households

From: Bob Andrews, President
International Association of Emergency Managers (IAEM)

The International Association of Emergency Managers appreciates the opportunity to comment on this rule change. The opportunity to comment is invaluable to the process of developing workable rules.

In general, IAEM supports the principle of streamlining the Individual Assistance program by the merging of the Temporary Housing and IFG programs under FEMA administration. We believe, however, that the dollar amounts contemplated under the proposed rule should be re-evaluated to be less restrictive with respect to use (e.g. it is terribly misleading to describe a \$10,000 grant as "home replacement") and more reflective of the maximums now in existence under the current programs. A maximum of \$10,000 is a significant reduction from the current combined maximums of the IFG and Temporary Housing programs. Since the experience of a number of our members has been that State involvement and oversight of IA programs has often resulted in significant improvement of those programs, we urge that states be given the ability to review and modify federal programs to more accurately reflect local needs and unique state situation.

We understand and appreciate FEMA's desire to streamline disaster mitigation programs; however, we believe the decision to eliminate post-disaster mitigation should be reconsidered. Our experience has been that the immediate aftermath of a disaster is the most opportune time to effect mitigation programs. Obviously, the massive effort of the past decade to implement buyout and community relocation projects were possible only due to the impact of the great floods of 1993 and subsequent flooding events.

We believe that the unrestricted sharing of information, not only among government agencies but also private, volunteer organization is essential and should be a requirement to receive any assistance, public or private, during a presidential declaration.

We agree that flood insurance should be a prerequisite to receiving assistance of those in flood prone areas and should be the responsibility of the recipient without any federal subsidy.

The International Association of Emergency Managers (IAEM) is an international organization dedicated to promoting the goals of saving lives and protecting property during emergencies and disasters. With 2000 members, IAEM brings together emergency management professionals from local government, the military, private industry, state and federal governments, volunteer organizations, and others interested in emergency management, both in the U.S. and worldwide.

Again, we express our gratitude for the opportunity to comment. We look forward to continued cooperation with the Federal Emergency Management Agency.