



*Disaster Recovery Reform Act (DRRA)*

# Annual Report

October 2019



# FEMA

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## Preface: A Word from the Acting Administrator

In 2017, the United States faced unprecedented challenges to its ability to prepare for, respond to, and recover from disasters. Hurricanes Harvey, Irma, and Maria caused significant damage across Texas, Florida, Puerto Rico, and the U.S. Virgin Islands. Later that year, a series of wildfires burned over 500,000 acres across northern and southern California. In response, the Federal Emergency Management Agency (FEMA) coordinated the largest response and recovery operations in the Nation's history.

In 2018, we took concrete steps to learn from these disasters. We released a new Strategic Plan focused on three goals: building a culture of preparedness, readying the nation for catastrophic disasters, and reducing the complexity of FEMA. We also worked with Congress to inform legislative and programmatic changes to improve our disaster preparedness, response, recovery, and mitigation programs. These changes were signed into law on October 5, 2018, as part of the Disaster Recovery Reform Act (DRRA).

This report provides an overview of the DRRA, highlights its alignment with FEMA's strategic goals, and describes FEMA's efforts to implement the law. I am proud to say that FEMA has made significant progress in implementing the DRRA in the year since it became law. I am also thankful to the countless hard-working Agency employees who have made that possible. We believe this extraordinary effort will pay dividends for FEMA, our emergency management partners, and the Nation for many years to come.



A handwritten signature in blue ink, appearing to read "PTG".

Pete Gaynor, Acting FEMA Administrator



# Executive Summary

The Disaster Recovery Reform Act represents the most comprehensive Emergency Management reform since the Post-Katrina Emergency Management Reform Act in 2006. It includes reforms that FEMA and the emergency management community have long sought to assist communities across the Nation, including: a larger and more reliable funding stream for pre-disaster mitigation, expanded assistance for individuals and households, and support for states, localities, tribes, and territories (SLTTs) to develop their own emergency management capabilities.

Many of the reforms included in the DRRRA acknowledge the shared responsibility across all levels of government for disaster preparedness, response, recovery, and mitigation. The DRRRA also advances FEMA's strategic goals of building a culture of preparedness, readying the nation for catastrophic disasters, and reducing the complexity of FEMA.



## Strategic Goal 1: Build a Culture of Preparedness

Goal 1 of FEMA's Strategic Plan is to create a culture of preparedness across America, in order to achieve resilience. The DRRRA advances this goal by incentivizing investments that reduce disaster risk (including pre-disaster mitigation) and supporting the adoption and enforcement of modern building codes.



## Strategic Goal 2: Ready the Nation for Catastrophic Disasters

Goal 2 of FEMA's Strategic Plan is to ready the nation for catastrophic disasters, in order to ensure that response and recovery missions are successful and more prepared than ever before. The DRRRA advances this goal by improving FEMA's ability to build a scalable and capable incident workforce and supporting our SLTT partners to further develop their own capabilities and resilience.



## Strategic Goal 3: Reduce the Complexity of FEMA

Goal 3 of FEMA's Strategic Plan is to reduce the complexity of FEMA, in order to be able to adapt to the public and the government's priorities. The DRRRA advances this goal by streamlining the disaster survivor and grantee experience, improving the coordination of disaster assistance delivery, strengthening grants management, and increasing FEMA's transparency.

In 2019, FEMA prioritized the implementation of five DRRA provisions that drive risk reduction and build capability for communities:



### Management Costs

Increased reimbursement for administrative costs incurred by SLTT governments when managing Public Assistance and Hazard Mitigation grant programs.



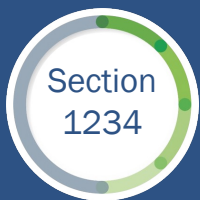
### Stafford Act to Title V Hiring Authority (Performance of Services)

The ability for temporary FEMA employees with three years of service to compete for permanent FEMA positions on equal footing with other government employees.



### Major Disaster Declaration Factors (Local Impact)

Greater consideration of severe local impact and multiple recent disasters when making a recommendation to the President on the declaration of a major disaster.



### National Public Infrastructure Pre-Disaster Hazard Mitigation

The development of a new pre-disaster hazard mitigation program to support greater investments in mitigation.



### Public Assistance Declaration Factors (Cost of Assistance Estimates)

A review of the regulatory factors that FEMA considers when making a recommendation to the President on the declaration of a major disaster for Public Assistance.

FEMA has made significant progress on the implementation of all five of these provisions. SLTT governments are now able to access increased management costs under both the Public Assistance and Hazard Mitigation grant programs. Over 4,000 applications have been received from FEMA temporary employees eligible to compete for permanent positions at the Agency under DRRA special hiring authority. FEMA's disaster declaration request and evaluation templates now request additional information regarding local impacts and recent disaster history so that FEMA may give them greater consideration. FEMA has also reviewed the remaining regulatory disaster declaration factors and is developing a proposed rule to update them. This September, FEMA made \$250 million available from the new pre-disaster mitigation fund to support projects under its existing pre-disaster mitigation program. The Agency is also developing a new pre-disaster mitigation program that will leverage the new fund to support SLTT efforts to undertake new and innovative infrastructure projects that reduce the risks that SLTTs face from disasters.

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Overall, FEMA has already implemented over half of the DRRRA's 56 provisions. In doing so, FEMA has expanded its support for mitigation generally, including providing an additional \$86 million in funding for wildfire mitigation projects to increase protection for nearly 2,500 properties. The Agency has also increased the amount of assistance available to individuals following a disaster, providing more than \$61 million in additional assistance to over 11,000 individuals, and more than \$12 million in additional disaster unemployment assistance to applicants in Puerto Rico and the U.S. Virgin Islands. FEMA has also published guidance for SLTTs on the prioritization of assistance during power outages, the identification of evacuation routes, and the coordination of emergency response plans for hazardous materials. Very shortly, the Agency will publish guidance on how states, tribes, and territories can administer a post-disaster housing program funded by FEMA.

These provisions represent significant changes to FEMA's programs, and many require policy or regulatory changes to implement and sustain. FEMA will continue to move quickly and deliberately to implement the DRRRA and accomplish the law's intent – bolstering the Nation's capacity to prepare for, mitigate against, and recover from major disasters.

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# I. Overview

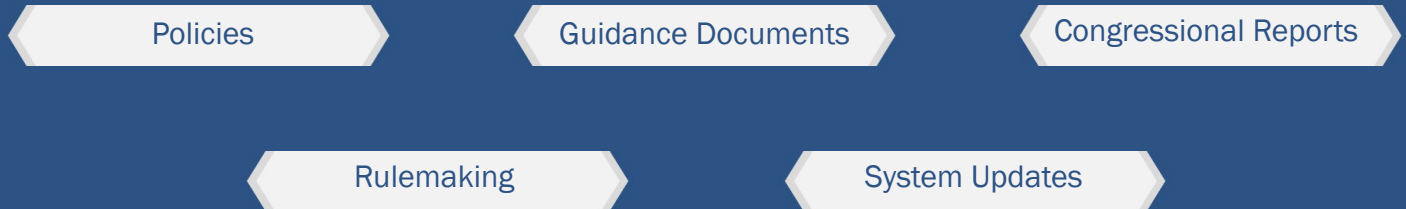
## The Disaster Recovery Reform Act

On October 5, 2018, President Donald J. Trump signed the Disaster Recovery Reform Act of 2018 into law as part of the Federal Aviation Administration Reauthorization Act of 2018. The DRRRA amends many sections of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), which grants the President the authority to issue emergency and major disaster declarations and provides a range of federal assistance to state, local, tribal, and territorial (SLTT) governments, as well as certain private nonprofit organizations and individuals and families.

## FEMA's Approach to Implementation

The DRRRA is comprised of 56 distinct provisions, many of which require policy or regulatory changes to implement. In order to expedite implementation of the law, FEMA identified accountable executives for each DRRRA provision and established a Policy Coordination Group (PCG) to oversee the Agency's implementation efforts. The PCG, whose membership includes senior leaders and accountable executives across FEMA, is responsible for ensuring a coordinated, inclusive, and rapid approach to the deliberation of cross-Agency policy decisions that are necessary for implementation of the DRRRA.

FEMA is implementing the DRRRA's provisions in a number of different ways, including through:



In implementing the DRRRA, FEMA has been mindful of the need to ensure that its policy decisions are properly considered and communicated to internal and external stakeholders. FEMA has conducted stakeholder engagement across numerous DRRRA provisions, including undertaking the largest stakeholder engagement in the Agency's history in order to inform the development of a new pre-disaster mitigation program. FEMA is also conducting outreach and consultation with tribal partners for specific DRRRA provisions and has hosted various national and regional in-person listening sessions and webinars to share information, answer questions, and receive input on its implementation of the law.



## Implementation Progress

FEMA has made significant progress in implementing the DRRRA. The timeline for implementation of each DRRRA provision varies depending on factors such as the scope of the provision, complexity of the program, and the method of implementation. Where appropriate, FEMA is utilizing interim guidance and policies to meet the demand for rapid implementation while allowing time for the refinement of final policies based on stakeholder feedback.

As of October 25, 2019, FEMA has implemented 29 of the DRRRA's 56 provisions. The Agency anticipates that another 12 provisions will be implemented by the end of 2019, for a total of 73% of the DRRRA's provisions. FEMA will continue to move quickly and deliberately to implement the DRRRA.

### DRRA By the Numbers as of October 25



**56**

Number  
of DRRRA  
Provisions



**52**

Percent of  
DRRA Provisions  
Implemented



**20**

Congressional  
Reports  
Required



**18**

Guidance  
Documents  
Released



**5**

Provisions  
Require  
Rulemaking

## II. Priority Provisions for 2019

In February 2019, the FEMA Administrator released the Annual Planning Guidance (APG) outlining the priorities of the Agency for resource and policy decisions in 2019. The APG prioritized the implementation of five DRRA provisions that drive risk reduction and build capability for communities.

Section 1215	Section 1234
Section 1222	Section 1239
Section 1232	

### Section 1215 – Management Costs

*Implemented*

This provision addresses FEMA’s reimbursement of administrative costs incurred by SLTT governments for the management of Public Assistance (PA) and Hazard Mitigation Grant Program (HMGP) projects. It increases the total amount of management costs eligible for reimbursement and expands the definition of management costs to include both direct and indirect administrative costs associated with a project. Under this provision, FEMA will reimburse management costs as follows:

- Up to 12 percent of the total award amount for PA (up to seven percent for the recipient and up to five percent for the subrecipient);
- Up to 15 percent of the total award amount for HMGP (up to ten percent for the recipient and up to five percent for the subrecipient).



3x increase in management costs available to SLTT governments for reimbursement

#### Impact

This provision supports FEMA’s efforts to increase SLTT capability to manage recovery and HMGP projects.

#### Implementation

- Issued interim policies on management costs for both PA and HMGP in November 2018.
- Published a Standard Operating Procedure and Fact Sheet for Public Assistance management costs in February 2019.
- Released a memorandum on reasonable costs for PA management costs in April 2019.

#### Next Steps

- FEMA is gathering feedback on the implementation of this provision from stakeholders, which will inform the Agency’s development of final policies.

## Section 1222 – Stafford Act to Title V Hiring Authority (Performance of Services)

### Implemented

This provision addresses the eligibility for permanent employment of FEMA temporary personnel. It authorizes FEMA to appoint temporary personnel, after three years of continuous service, to permanent full-time (PFT) positions at FEMA in the same manner that competitive service employees are considered for such positions. Prior to the DRRRA, FEMA temporary employees were considered for PFT positions at FEMA in the same manner as members of the general public.



Over 3,000 applications have been received from FEMA temporary employees eligible to compete for permanent positions at the Agency under DRRRA special hiring authority



Almost 400 job announcements have been posted on USAJobs for permanent Agency positions eligible for DRRRA special hiring authority

### Impact

This provision supports FEMA's efforts to retain and promote an experienced and talented workforce by creating a career path for eligible temporary employees who support disaster management activities.

### Implementation

- Issued an interim directive in June 2019 to modify its merit promotion and internal placement procedures in order to implement this new authority.
- Since July 2019, all FEMA job announcements for PFT positions include language explaining the requirements for eligibility under this special hiring authority.

### Next Steps

- FEMA will update its merit promotion and internal placement policies to permanently incorporate the changes authorized by this provision.



Over 4,000 job applications have been received from applicants eligible for DRRRA special hiring authority

## Section 1232 – Major Disaster Declaration Factors (Local Impact)

### Implemented

This provision addresses two of the regulatory factors that FEMA considers when making a recommendation to the President on the declaration of a major disaster. It directs the Agency to give greater consideration to severe local impacts and recent multiple disasters when evaluating a request for a major disaster declaration.

#### Impact

This provision informs FEMA’s evaluation of all requests for a major disaster declaration by states, tribes, and territories (STT).

#### Implementation

- FEMA updated its disaster declaration request and evaluation templates in May 2019, in order to allow state and territorial governments to submit additional information regarding severe local impacts and recent disaster history, so that the Agency may give greater consideration to those impacts.
- FEMA will continue to utilize the factors in Tribal Declarations Pilot Guidance to process Indian tribal government requests for emergencies and major disaster declarations, which already takes in consideration the localized impacts of a disaster.

### Public Assistance Declaration Regulatory Factors

- ★ Estimated Cost of Assistance
- ★ Localized Impacts
- ★ Insurance Coverage in Force
- ★ Hazard Mitigation
- ★ Recent Multiple Disasters
- ★ Programs of Other Federal Assistance

### Individual Assistance Declaration Regulatory Factors

- ★ State Fiscal Capacity and Resource Availability
- ★ Uninsured Home and Personal Property Losses
- ★ Disaster Impacted Population Profile
- ★ Impact to Community Infrastructure
- ★ Casualties
- ★ Disaster Related Unemployment

## Section 1234 – National Public Infrastructure Pre-Disaster Hazard Mitigation

### In Progress

This provision addresses FEMA’s support for hazard mitigation at the state, local, tribal, and territorial (SLTT) levels. It creates a pre-disaster hazard mitigation program to support greater investments in mitigation planning and projects before a disaster. These investments will be funded by a set-aside from the federal Disaster Relief Fund that is equal to six percent of the aggregate amount of federal disaster grants provided each year. By encouraging more cost-effective investment of taxpayer dollars before disaster strikes, the BRIC program will help save lives, reduce disaster suffering, and decrease disaster costs at all levels.



3,000+ stakeholders engaged through webinars, workshops, and conferences



5,000+ comments received from intergovernmental and tribal partners, interest groups, and more than a dozen states

#### Impact

This provision supports FEMA’s efforts to incentivize pre-disaster mitigation by providing a more reliable stream of funding that enables communities to better plan and execute mitigation programs that reduce their disaster risk.

#### Implementation

- FEMA is developing a new pre-disaster mitigation program, Building Resilient Infrastructure and Communities (BRIC), to implement this provision.
- The Agency has conducted extensive stakeholder engagement to inform the development of the BRIC program, including through webinars, regional/state workshops, national conferences, tribal engagements, and crowdsourcing; to date, FEMA has received over 5,000 comments across all channels.
- FEMA has allocated \$250 million of funding under this provision to fund its existing Pre-Disaster Mitigation (PDM) Program in Fiscal Year 2019. Fiscal Year 2019 will be the last cycle of PDM before BRIC’s full launch in Fiscal Year 2020.

#### Next Steps

- FEMA plans to publish a draft policy for the BRIC program in 2020 for public comment.
- FEMA anticipates releasing the first Notice of Funding Opportunity in Summer 2020 and plans to open the application period in September 2020.



## Section 1239 – Public Assistance Declaration Factors (Cost of Assistance Estimates)

*In Progress*

This provision addresses the six regulatory factors that FEMA considers when making a recommendation to the President on the declaration of a major disaster for Public Assistance (PA). It requires FEMA to review and update the regulatory factors for PA declarations, specifically the estimated cost of assistance factor. This factor evaluates the estimated cost of Federal and nonfederal PA against the statewide population (i.e., the per capita indicator) and also applies a minimum threshold for PA damages per disaster.



Six regulatory factors for Public Assistance declarations under review

### Impact

This provision informs FEMA’s evaluation of requests for a major disaster declaration for PA by states and territories.

### Implementation

- FEMA is currently reviewing the six regulatory factors for PA declarations for states and territories and has begun the process of developing a Notice of Proposed Rulemaking (NPRM).
- FEMA will continue to utilize the factors in the Tribal Declarations Pilot Guidance to process Indian tribal government requests for emergencies and major disaster declarations.

### Next Steps

- FEMA anticipates publishing the NPRM in 2020.

### III. DRRRA Provisions

The DRRRA supports FEMA’s efforts to build a culture of preparedness, ready the Nation for catastrophic disasters, and reduce the complexity of FEMA.

#### Building a Culture of Preparedness

Several DRRRA provisions advance FEMA’s strategic goal of building a culture of preparedness. These provisions incentivize investments that reduce risk, specifically mitigation, and help people prepare for disasters.



Section 1204	Section 1233
Section 1205	Section 1235(a)
Section 1206	Section 1235(b)
Section 1208	Section 1236
Section 1209	Section 1240
Section 1210(b)	Section 1242
Section 1231	Section 1246

#### Section 1204 – Wildfire Prevention

*Implemented*

This provision authorizes FEMA to provide HMGP funding to areas that receive a Fire Management Assistance Grant (FMAG) declaration. Prior to the DRRRA, HMGP funding was only available following a major disaster declaration. This provision codifies a pilot program that made HMGP available following FMAG declarations.

**Implementation:** FEMA issued a final policy that increases and streamlines mitigation assistance (*Hazard Mitigation Grant Program – Post Fire*) in May 2019.

## Building a Culture of Preparedness



### Section 1205 – Additional Activities (Wildfires and Windstorms)

*In Progress*

This provision authorizes FEMA to provide assistance under the HMGP and PDM programs for activities related to wildfire and windstorm mitigation. Eligible activities range from reseeding damaged groundcover with native species to installing utility poles that are resilient to extreme winds.

**Implementation:** The mitigation activities covered in this provision are currently allowable as part of eligible projects under the HMGP and PDM programs. FEMA is currently researching applied science for wildfire mitigation activities and developing informational resources to provide guidance on how to incorporate these activities into mitigation project applications.

### Section 1206 – Eligibility for Code Administration and Enforcement

*In Progress*

This provision authorizes FEMA to provide assistance to SLTT governments for building code and floodplain management ordinance administration and enforcement. Base and overtime wages for extra hires for enforcement of adopted building codes are now eligible for reimbursement for a period of 180 days post disaster declaration.

**Implementation:** FEMA is developing a new policy to implement this provision. Reimbursement for eligible activities will be made after the policy is published.

### Section 1208 – Prioritization of Facilities (Power Outages)

*Implemented*

This provision requires FEMA to develop guidance and annual training for SLTT governments, first responders, and utility companies on the need to prioritize assistance to hospitals, nursing homes, and other long-term care facilities during power outages; how to prepare for power outages; and the importance of developing a strategy to coordinate emergency response plans.

**Implementation:** FEMA released a guidance document (*Healthcare Facilities and Power Outages: Guidance for State, Local, Tribal, Territorial and Private Sector Partners*) in August 2019.

### Section 1209 – Guidance on Evacuation Routes

*Implemented*

This provision requires FEMA, in coordination with the Federal Highway Administration, to develop guidance for SLTT governments on the identification of evacuation routes.

**Implementation:** FEMA released a guidance document (*Planning Considerations: Evacuation and Shelter-in-Place: Guidance for State, Local, Tribal, and Territorial Partners*) in July 2019.

## Building a Culture of Preparedness



### Section 1210(b) – Duplication of Benefits (Federally Authorized Water Resources Development Projects)

*In Progress*

This provision authorizes FEMA to fund eligible HMGP activities within the scope of a U.S. Army Corps of Engineers (USACE) federally authorized water redevelopment project. This provision expands the scope of eligible assistance under the HMGP program to allow FEMA to fund USACE-authorized projects that were once considered a duplication of benefits.

**Implementation:** This authority was immediately effective. FEMA is developing a Fact Sheet to provide guidance to states, Federally-recognized tribes, or territories who choose to prioritize HMGP funding for eligible mitigation activities that are within the scope of a USACE federally-authorized water resources development project.

### Section 1231 – Guidance on Hazard Mitigation Assistance (Acquisition)

*Implemented*

This provision requires FEMA to issue guidance to SLTT governments on how to manage properties acquired for open space under the HMGP program.

**Implementation:** FEMA released a Fact Sheet (*Disaster Recovery Reform Act Acquisition of Property for Open Space*) and a Model Statement of Assurances in September 2019.

### Section 1233 – Additional Hazard Mitigation Activities (Earthquakes)

*In Progress*

This provision authorizes FEMA to provide assistance under the HMGP and PDM programs for activities that reduce earthquake risk and support building capability for earthquake early warning in areas affected by earthquake hazards.

**Implementation:** FEMA is collaborating with the U.S. Geological Survey to develop new eligible project types that will support improvements to earthquake early warning systems.

### Section 1235(a) – Additional Mitigation Activities (Resilience)

*In Progress*

This provision authorizes FEMA to provide assistance under the HMGP program for mitigation activities that “increase resilience to” future damage, hardship, loss, or suffering.

**Implementation:** FEMA is evaluating presently-eligible HMGP activities against the definition of resilience developed by the National Institute of Standards and Technology (NIST): the ability to prepare for anticipated hazards, adapt to changing conditions, and withstand and recover rapidly from disruptions. This evaluation will inform changes to the HMGP program necessary to implement this provision.

## Building a Culture of Preparedness



### Section 1235(b) – Additional Mitigation Activities (PA Codes and Standards)

*In Progress*

This provision authorizes FEMA to provide Public Assistance (PA) to replace and restore disaster damaged facilities to the latest published editions of relevant consensus-based codes and standards to ensure that facilities are restored in a manner that allows them to be “resilient.” It also requires FEMA to define the term “resilient” by rulemaking.

**Implementation:** FEMA is developing interim guidance to identify consensus-based codes and standards that incorporate hazard-resistant design. FEMA will also conduct required rulemaking to adopt the NIST definition of resilience.

### Section 1236 – Guidance and Training on Coordination of Emergency Response Plans (Hazardous Materials)

*Implemented*

This provision requires FEMA to provide guidance and annual training for SLTT governments, first responders, and facilities that store hazardous materials on the coordination of emergency response plans in the event of a major disaster, to include severe weather events.

**Implementation:** FEMA released a guidance document (*Hazardous Materials Incidents: Guidance for State, Local, Tribal, Territorial, and Private Sector Partners*) in August 2019.

### Section 1240 – Report on Insurance Shortfalls

*In Progress*

This provision requires FEMA to provide an annual report to Congress on instances in which self-insurance amounts were insufficient to address flood damages. This study, and subsequent updates, will examine the instances and estimated amounts in which self-insurance amounts were insufficient to address flood damages. This study will promote shared responsibility by highlighting insufficient self-insurance amounts and demonstrating that, had SLTTs been adequately covered, they would have the capability to respond to disasters without requiring Federal assistance.

**Implementation:** FEMA is conducting a study of insurance coverage for public buildings that will inform FEMA’s identification of insufficient self-insurance amounts for flood damage.



## Building a Culture of Preparedness



### Section 1242 – Updates on National Preparedness Assessment

*Implemented*

This provision requires FEMA to provide regular progress updates to Congress on the Agency's development of a national preparedness assessment recommended by the GAO in 2012. This assessment is intended to review security risks and capabilities in order to prioritize preparedness grant funding.

**Implementation:** FEMA is developing a National Risk and Capability Assessment, a suite of assessment products that will measure risk and capabilities at all levels of government, identify preparedness gaps, and inform federal resource investments and preparedness. FEMA began regular biannual progress updates to Congress in May 2019.

### Section 1246 – Extension (Reasonable and Prudent Alternative)

*Implemented*

This provision directs FEMA to extend the deadline for an alternative implementation option for the National Flood Insurance Program in the State of Oregon.

**Implementation:** FEMA extended the implementation deadline by three years in February 2019. FEMA is working with stakeholder communities and the State of Oregon to establish a path forward for implementation of the alternative option.

## Ready the Nation for Catastrophic Disasters

Several DRRA provisions advance FEMA’s strategic goal of readying the Nation for catastrophic disasters. These provisions support FEMA’s efforts to build a scalable and capable incident workforce, enhance intergovernmental coordination, and develop the capabilities and resilience of our SLTT partners.



Section 1211

Section 1241

Section 1218

### Section 1211 – State-Administered Direct Housing

*In Progress*

This provision authorizes FEMA to provide grants to state, territory, or tribal governments to administer direct temporary housing assistance and/or permanent housing construction as part of a two-year pilot program. It also allows state, tribal, and territorial (STT) governments that implement cost-effective disaster housing solutions to be reimbursed in certain circumstances. This provision requires FEMA to provide a report to Congress on the effectiveness of the pilot program and potential incentives to encourage participation by state and tribal governments.

**Implementation:** FEMA is developing interim guidance (*State-Administered Direct Housing Grant Guide*) to enable the pilot program.

#### State-Administered Direct Housing Grant Guide

- Defines the grant application, review, award, and post-award coordination requirements for a State-Administered Direct Housing mission
- Describes how FEMA staff at all levels manage, coordinate, and organize to support a State-Administered Direct Housing mission
- Defines the functions and capabilities required by the STT government to initiate, implement, and administer direct housing on FEMA’s behalf

## Ready the Nation for Catastrophic Disasters



### Section 1218 – National Veterinary Emergency Teams

*Not Implemented*

This provision authorizes FEMA to establish one or more national veterinary emergency teams at accredited colleges of veterinary medicine.

**Implementation:** This capability is already provided by the Department of Health and Human Services (HHS) in coordination with the United States Department of Agriculture (USDA).

### Section 1241 – Post-Disaster Building Safety Assessment

*In Progress*

This provision directs FEMA to develop guidance for building experts to use when they assess structures for safety after a disaster.

**Implementation:** FEMA is developing guidance on best practices for post-disaster building safety assessments. The Agency is also developing guidance on job titles and resource requirements for building safety assessment teams under the National Incident Management System (NIMS).

Goal 3  
Reduce the  
Complexity of FEMA



## Reduce the Complexity of FEMA

Several DRRRA provisions advance FEMA’s strategic goal of reducing Agency complexity. These provisions streamline the disaster survivor and grantee experience, strengthen grants management, and increase transparency.

Section 1207(a)	Section 1224(b)
Section 1207(b)	Section 1224(c)
Section 1207(c)	Section 1224(d)
Section 1207(d)	Section 1224(e)
Section 1210(a)	Section 1225
Section 1210(a)(5)	Section 1226
Section 1212	Section 1227
Section 1213	Section 1228
Section 1214	Section 1229
Section 1216(a)(b)	Section 1230(a)
Section 1216(c)	Section 1230(b)
Section 1219	Section 1237
Section 1220	Section 1238(a)
Section 1221	Section 1238(b)
Section 1223	Section 1244
Section 1224(a)	

## Reduce the Complexity of FEMA



### Section 1207(a) – Program Improvements (Alternative Projects Penalty)

*Implemented*

This provision eliminates the mandatory reduction in PA when applicants do not restore the function of a disaster-damaged facility and instead conduct an Alternate Project. Prior to the DRRRA, FEMA reduced PA funding for Alternate Projects unless applicants opted into the PA Alternative Procedures pilot program.

**Implementation:** This provision was immediately effective. FEMA released a Fact Sheet with additional guidance (*Disaster Recovery Reform Act Public Assistance Program Amendments*) in July 2019.

### Section 1207(b) – Program Improvements (Flood Insurance Reduction)

*Implemented*

This provision limits the mandatory reduction in PA for insurable facilities in a Special Flood Hazard Area to one building of a multi-structure educational, law enforcement, correctional, fire, or medical campus. This provision applies to disasters or emergencies declared from January 1, 2016 to December 31, 2018.

**Implementation:** FEMA provided direction to its Regional offices on the implementation of this provision in August 2019.

### Section 1207(c) – Program Improvements (Alternative Procedures Participation)

*Implemented*

This provision prohibits FEMA from requiring participation in the PA Alternative Procedures pilot program by conditioning PA on participation in the program.

**Implementation:** This provision reinforces current law and policy that use of PA Alternative Procedures is voluntary and optional for each applicant. FEMA released a Fact Sheet with additional guidance (*Disaster Recovery Reform Act Public Assistance Program Amendments*) in July 2019.

### Section 1207(d) – Program Improvements (Alternative Procedures Cost Estimates)

*Implemented*

This provision creates a presumption that FEMA-accepted fixed cost estimates under the PA Alternative Procedures pilot program, which are certified by a professionally licensed engineer, are reasonable and eligible costs. Once FEMA and the applicant agree to a fixed-cost on a project, FEMA will not adjust PA funding on the basis of reasonableness or eligibility.

**Implementation:** This provision was immediately effective. FEMA released a Fact Sheet with additional guidance (*Disaster Recovery Reform Act Public Assistance Program Amendments*) in July 2019.



## Reduce the Complexity of FEMA



### Section 1210(a) – Waiver of Duplication of Benefits

*Implemented*

This provision authorizes the President to waive the general prohibition on duplication of benefits under the Stafford Act if the waiver is in the public interest and will not result in waste, fraud, or abuse. It specifically excludes repair and replacement assistance under PA and all assistance under Individual Assistance (IA). It also prohibits the President from considering a loan to be a duplication of benefits.

**Implementation:** FEMA released a Fact Sheet outlining the scope of this authority (*Waiver of Duplication of Benefits under the Disaster Recovery Reform Act*) in February 2019. The U.S. Department of Housing and Urban Development published guidance in the Federal Register in June 2019 on how this authority applies to reimbursement under the Community Development Block Grant program.

### Section 1210(a)(5) – Report on Disaster Assistance to Individuals

*In Progress*

This provision requires FEMA to provide a report to Congress on actions taken by Federal agencies to improve the comprehensive delivery of disaster assistance to individuals.

**Implementation:** FEMA is examining the delivery of post-disaster assistance to individuals and households across Federal agencies to inform its report to Congress.

### Section 1212 – Expanded Assistance to Individuals and Households

*Implemented*

This provision establishes separate maximum grant amounts for Housing Assistance and Other Needs Assistance under the Individuals and Households Program. It also excludes Financial Temporary Housing Assistance and accessibility-related items from the maximum grant amounts.

**Implementation:** FEMA began making retroactive payments to eligible applicants in March 2019. In April 2019, FEMA implemented automatic processing of the new maximum grant amounts for new and open disasters.

- As of October 2019, FEMA has made over \$61 million in retroactive payments to over 11,000 applicants.

## Reduce the Complexity of FEMA



### Section 1213 – Multi-Family Lease and Repair Assistance

*In Progress*

This provision authorizes FEMA to make repairs to properties in its Multi-Family Lease and Repair (MLR) program that exceed the value of the lease agreement. It also expands the MLR program to include properties in areas impacted by a disaster, in addition to properties in areas included in a major disaster declaration.

**Implementation:** FEMA is updating its *Individual Assistance Program and Policy Guide* to implement this provision. In the interim, FEMA will implement this provision, as warranted by disaster impacts, through policy waivers.

### Section 1214 – Private Nonprofit Facility (Food Banks)

*Implemented*

This provision adds food banks to the list of private non-profit facilities eligible for PA. This includes food banks that accept and store donated food, in addition to food banks that distribute food directly to the public.

**Implementation:** This provision was immediately effective. FEMA released a Fact Sheet with additional guidance (*Disaster Recovery Reform Act Public Assistance Program Amendments*) in July 2019.

### Section 1216 (a) and (b) – Flexibility (IA Debt Waiver and Statute of Limitations)

*Implemented*

This provision authorizes FEMA to waive debts owed by recipients of Individual and Households Program assistance payments when the debt is the result of FEMA error, not the fault of the debtor, and collection of the debt would be against equity and good conscience. It also establishes a three-year statute of limitations on the collection of Individual and Households Program debts.

**Implementation:** FEMA updated its recoupment process for IA recipients in May 2019. A waiver notice is now included in all debt recoupment letters.

### Section 1216(c) – Flexibility (PA Statute of Limitations)

*In Progress*

This provision modifies the three-year statute of limitations for FEMA's recoupment of PA payments to SLTT governments. It changes the start of the limitations period, which was previously the date that a SLTT government certified completion of eligible projects for a disaster or emergency, to the date that each individual project is completed.

**Implementation:** FEMA is updating its policy on grant closeout procedures to implement this provision.

## Reduce the Complexity of FEMA



### Section 1219 – Right of Arbitration (Public Assistance)

*Implemented*

This provision creates a permanent right of arbitration before the Civilian Board of Contract Appeals, in lieu of a second appeal, for disputes under the PA program for more than \$500,000 (\$100,000 in rural areas).

**Implementation:** Arbitration is currently available under existing procedures established following Hurricane Katrina. FEMA released a Fact Sheet with additional guidance (*Public Assistance Appeals and Arbitration Under the Disaster Recovery Reform Act*) in March 2019.

### Section 1220 – Unified Federal Environmental and Historic Preservation Review

*In Progress*

This provision requires FEMA to review and provide a report to Congress on the implementation of the Unified Federal Environmental and Historic Preservation Review (UFR) process, including the use of categorical exclusions by Federal agencies, and to implement any recommendations by rulemaking.

**Implementation:** FEMA is finalizing a report to Congress on its review of the UFR process and will work to implement any regulatory recommendations outlined in the report.

### Section 1221 – Closeout Incentives

*In Progress*

This provision authorizes FEMA to develop “incentives and penalties” to encourage SLTT governments to ensure timely closeout of disaster grants.

**Implementation:** FEMA is in the process of considering possible incentives and penalties to encourage timely closeout of disaster grants.

### Section 1223 – Study to Streamline and Consolidate Information Collection

*In Progress*

This provision requires FEMA to conduct an interagency study to streamline information collection from disaster assistance applicants and grantees, and to establish a public website to present information on Federal disaster assistance awards.

**Implementation:** FEMA is evaluating inspection processes and other information collection processes across FEMA and other relevant Federal agencies to develop a plan to streamline and consolidate information collection. FEMA is also coordinating with the Recovery Support Function Leadership Group to develop a public website for posting information on Federal disaster assistance awards.

## Reduce the Complexity of FEMA



### Section 1224(a) – Agency Accountability (Public Assistance)

*Implemented*

This provision requires FEMA to publish on its website information on PA grants over \$1 million.

**Implementation:** FEMA already posts the required information for all PA grants at FEMA.gov.

### Section 1224(b) – Agency Accountability (Mission Assignments)

*Implemented*

This provision requires FEMA to publish on its website information on Mission Assignments over \$1 million.

**Implementation:** FEMA currently posts information on Mission Assignments on FEMA.gov and has updated its reporting to include all required information.

### Section 1224(c) – Agency Accountability (Disaster Relief Fund Monthly Report)

*Implemented*

This provision requires FEMA to publish on its website a monthly report on the status of the Disaster Relief Fund.

**Implementation:** FEMA updated its monthly report on the Disaster Relief Fund to include all required information in August 2019. The report is posted monthly on FEMA.gov.

### Section 1224(d) – Agency Accountability (FEMA Contracts)

*In Progress*

This provision requires FEMA to publish on its website information on all FEMA contracts in excess of \$1 million.

**Implementation:** Information on all FEMA contracts is currently available on FEMA.gov. FEMA is in the process of automating data collection for the purpose of posting this information on its website.

### Section 1224(e) – Agency Accountability (Recipient and Sub-Recipient Contracts)

*In Progress*

This provision requires FEMA to collect information on contracts in excess of \$1 million entered into by SLTT governments that receive PA and HMGP funding.

**Implementation:** FEMA is in the process of revising its information collection processes and updating its grant systems to collect the required contract information.

## Reduce the Complexity of FEMA



### Section 1225 – Audit of Contracts

*Implemented*

This provision prohibits FEMA from reimbursing any activities made pursuant to a contract that prohibits the Administrator or the Comptroller General of the United States from auditing or otherwise reviewing all aspects related to the contract.

**Implementation:** FEMA is updating its *Required Contract Provisions Template*, *Procurement Disaster Assistance Team (PDAT) Manual*, and PDAT Procurement Under Grants Presentation.

### Section 1226 – Inspector General Audit of Contracts for Tarps & Plastic Sheeting

*Implemented*

This provision requires the Inspector General of the Department of Homeland Security (DHS) to initiate an audit of FEMA contracts to purchase tarps and plastic sheeting for Puerto Rico and the U.S. Virgin Islands following Hurricane Irma and Hurricane Maria.

**Implementation:** The Inspector General for DHS submitted its audit report to Congress in June 2019.

### Section 1227 – Expanding Relief Organizations

*In Progress*

This provision adds long-term recovery groups and domestic hunger relief groups to the list of organizations that FEMA utilizes and coordinates with on disaster assistance.

**Implementation:** FEMA is entering into Memoranda of Agreements (MOAs) with domestic feeding organizations including Feeding America and Send Relief. FEMA is also updating its *Individual Assistance Program and Policy Guide* to reflect this change.

### Section 1228 – Guidance on Inundated and Submerged Roads

*In Progress*

This provision requires FEMA, in coordination with the Federal Highway Administration, to issue guidance regarding the repair, restoration, and replacement of inundated and submerged roads damaged or destroyed by a major disaster. Existing PA policy is that any damage that is not visible or quantifiable during inspection is not eligible for repair or replacement.

**Implementation:** FEMA is developing an interim policy to clarify the eligibility of disaster damages resulting from prolonged inundation during a prolonged event.



## Reduce the Complexity of FEMA



### Section 1229 – Extension of Assistance (DUA for PR & USVI)

*Implemented*

This provision extends Disaster Unemployment Assistance (DUA) from 26 to 52 weeks for Hurricane Irma and Maria survivors in Puerto Rico and the U.S. Virgin Islands.

**Implementation:** FEMA began making retroactive payments in early 2019.

#### Assistance as of July 2019:

Puerto Rico	U.S. Virgin Islands
Number of approved applicants: 2,603	Number of approved applicants: 1,189
Total Assistance: \$8,096,803	Total Assistance: \$4,588,350
Average assistance per claimant: \$3,110.57	Average assistance per claimant: \$3,859.00

### Section 1230(a) – Guidance and Recommendations (Common Interest Communities)

*Implemented*

This provision requires FEMA to provide technical assistance “to a common interest community that provides essential services of a governmental nature” on how they may be eligible for PA.

**Implementation:** FEMA currently provides technical assistance to common interest communities on eligibility for PA.

### Section 1230(b) – Guidance and Recommendations (Condos and Co-Ops)

*In Progress*

This provision requires FEMA to provide Congress with a legislative proposal on how to provide eligibility for disaster assistance for common areas of condos and housing cooperatives.

**Implementation:** FEMA is finalizing a report to Congress that includes a legislative proposal for eligibility of common areas in condos and housing cooperatives.

## Reduce the Complexity of FEMA



### Section 1237 – Certain Recoupment Prohibited (Reliance on PA Technical Assistance Contractor)

*Implemented*

This provision requires FEMA to restore PA that has been withdrawn or de-obligated in cases where the Inspector General for DHS has determined that a local government relied on inaccurate information provided by a FEMA technical assistance contractor.

**Implementation:** FEMA provided direction to its Region VI office on implementation of this provision in February 2019. The Agency has also reinstated relevant PA project worksheets.

### Section 1238(a) – Critical Document Fee Waiver

*In Progress*

This provision authorizes the President, in consultation with the Governor of a State, to waive the document replacement fees for passports and certain immigration-related documents of individuals or households adversely affected by a major disaster.

**Implementation:** The President delegated the authority to implement these waivers to the Secretary of State (for passports) and DHS (for immigration forms) in December 2018.

### Section 1238(b) – Private Nonprofit Childcare Facilities

*Implemented*

This provision adds center-based childcare to the list of private non-profit facilities eligible for PA. Private non-profit childcare facilities were previously eligible for PA, but this amendment specifically defines center-based childcare services as eligible services.

**Implementation:** This provision was immediately effective. FEMA released a Fact Sheet with additional guidance (*Disaster Recovery Reform Act Public Assistance Program Amendments*) in July 2019.

### Section 1243 – Report on Duplication in Non-Disaster Preparedness Grant Programs

*In Progress*

This provision requires FEMA to provide a report to Congress on the results of FEMA's efforts to identify and prevent unnecessary duplication within four of its non-disaster preparedness grant programs, as recommended by GAO in 2012.

**Implementation:** FEMA has employed multiple strategies and tools to identify potential unnecessary duplication within the State Homeland Security Grant Program, Urban Area Security Initiative, Port Security Grant Program, and the Transit Security Grant Program. To date, no such duplicative projects have been identified. FEMA has finalized the required report and it will be forwarded to Congress.

## Reduce the Complexity of FEMA



### Section 1244 – Study and Report on Best Practices in Mortality Counts

*In Progress*

This provision requires FEMA to contract with the National Academies of Medicine to study and prepare a report on best practices in quantifying mortality after a major disaster.

**Implementation:** FEMA entered into a contract with the National Academies of Medicine in December 2018. The report is expected in 2020.

### Section 1245 – Review of Assistance for Damaged Underground Water Infrastructure

*In Progress*

This provision requires FEMA to review and provide a briefing and report to Congress on the assessment and eligibility process under the PA program for underground water infrastructure damaged as a result of a major declared disaster.

**Implementation:** FEMA briefed Congressional staff on its initial findings in July 2019.

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## IV. Conclusion

The Disaster Recovery Reform Act makes significant changes to FEMA's programs that bolster the Nation's capacity to prepare for, mitigate against, and recover from major disasters. The DRRRA also advances FEMA's strategic goals and reflects the shared responsibility for emergency management at all levels of government. Implementation of the DRRRA has been, and will continue to be, a top priority for the Agency.

In the year since the legislation was signed into law, FEMA has already implemented over half of its provisions, many of which have very real impacts to states, localities, tribes, and territories, as well as individuals and families across the Nation.

FEMA is committed to achieving full implementation of the DRRRA. For additional information on the DRRRA and the most updated status of its implementation, please visit <https://www.fema.gov/DRRA>.

## Appendix A: Acronyms and Links

The following acronyms for entities, programs, and legislation are used throughout this report.

**Table A-1 Acronym Table**

<b>Acronym</b>	<b>Name of Entity or Legislation</b>
APG	Annual Planning Guidance
BRIC	Building Resilient Infrastructure and Communities
DRRA	Disaster Recovery Reform Act
DUA	Disaster Unemployment Assistance
FEMA	Federal Emergency Management Agency
FMAG	Fire Management Assistance Grant
GAO	Government Accountability Office
HHS	Department of Health and Human Services
HMGP	Hazard Mitigation Grant Program
IA	Individual Assistance
MLR	Multi-Family Lease and Repair
MOA	Memoranda of Agreements
NPRM	Notice of Proposed Rulemaking
NIMS	National Incident Management System
NIST	National Institute of Standards and Technology
NPAD	National Preparedness Assessment Division
OIG	Office of the Inspector General
PA	Public Assistance
PCG	Policy Coordination Group
PDAT	Procurement Disaster Assistance Team
PDM	Pre-Disaster Mitigation Program
SLTT	State, Local, Tribal, and Territorial
STT	State, Tribal, and Territorial
UFR	Unified Federal Environmental and Historic Preservation Review
USACE	U.S. Army Corps of Engineers

**Table A-2 Helpful Links**

<b>Name</b>	<b>Link</b>
Disaster Recovery Reform Act (DRRA)	<a href="https://www.congress.gov/bill/115th-congress/house-bill/302/">https://www.congress.gov/bill/115th-congress/house-bill/302/</a>
Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)	<a href="https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended">https://www.fema.gov/robert-t-stafford-disaster-relief-and-emergency-assistance-act-public-law-93-288-amended</a>
FEMA's DRRA Website	<a href="https://www.fema.gov/DRRA">https://www.fema.gov/DRRA</a>



## Appendix B: Index of DRRRA Provisions

The below table lists the DRRRA provisions and their respective page in this report.

**Table B-1 Provision Index**

<b>Provision</b>	<b>Strategic Goal Alignment</b>	<b>Status</b>	<b>Page #</b>
Section 1204 – Wildfire Prevention	Goal 1	Implemented	8
Section 1205 – Additional Activities (Wildfires and Storms)	Goal 1	In Progress	9
Section 1206 – Eligibility for Code Administration and Enforcement	Goal 1	In Progress	9
Section 1207(a) – Program Improvements (Flood Insurance Reduction	Goal 3	Implemented	16
Section 1207(b) – Program Improvements (Flood Insurance Reduction)	Goal 3	Implemented	16
Section 1207(c) - Program Improvements (Alternative Procedures Participation)	Goal 3	Implemented	16
Section 1207(d) – Program Improvements (Alternative Procedures Cost Estimates)	Goal 3	Implemented	16
Section 1208 – Prioritization of Facilities (Power Outages)	Goal 1	Implemented	9
Section 1209 – Guidance on Evacuation Routes	Goal 1	Implemented	9
Section 1210(a) – Waiver of Duplication of Benefits	Goal 3	Implemented	17
Section 1210(a)(5) – Report on Disaster Assistance to Individuals	Goal 3	In Progress	17
Section 1210(b) – Duplication of Benefits (Federally Authorized Water Resources Development Projects)	Goal 1	In Progress	10
Section 1211 – State-Administered Direct Housing	Goal 2	In Progress	13
Section 1212 – Expanded Assistance to Individuals and Households	Goal 3	Implemented	17
Section 1213 – Multi-Family Lease and Repair Assistance	Goal 3	In Progress	18
Section 1214 – Private Nonprofit Facility (Food Banks)	Goal 3	Implemented	18
Section 1215 – Management Costs	Goal 2	Implemented	3

<b>Provision</b>	<b>Strategic Goal Alignment</b>	<b>Status</b>	<b>Page #</b>
Section 1216 (a) and (b) – Flexibility (IA Debt Waiver and Statute of Limitations)	Goal 3	Implemented	18
Section 1216(c) – Flexibility (PA Statute of Limitations)	Goal 3	In Progress	18
Section 1218 – National Veterinary Emergency Teams	Goal 2	Not Implemented	14
Section 1219 – Right of Arbitration (Public Assistance)	Goal 3	Implemented	19
Section 1220 – United Federal Environmental and Historic Preservation Review	Goal 3	In Progress	19
Section 1221 – Closeout Incentives	Goal 3	In Progress	19
Section 1222 – Stafford Act to Title V Hiring Authority (Performance of Services)	Goal 2	Implemented	4
Section 1223 – Study to Streamline and Consolidate Information Collection	Goal 3	In Progress	19
Section 1224(a) – Agency Accountability (Public Assistance)	Goal 3	Implemented	20
Section 1224(b) – Agency Accountability (Mission Assignments)	Goal 3	Implemented	20
Section 1224(c) – Agency Accountability (Disaster Relief Fund Monthly Report)	Goal 3	Implemented	20
Section 1224(d) – Agency Accountability (FEMA Contracts)	Goal 3	In Progress	20
Section 1224(e) - Agency Accountability (Recipient and Sub-Recipient Contracts)	Goal 3	In Progress	20
Section 1225 – Audit of Contracts	Goal 3	Implemented	21
Section 1226 – Inspector General Audit of Contracts for Tarps & Plastic Sheeting	Goal 3	Implemented	21
Section 1227 – Expanding Relief Organizations	Goal 3	In Progress	21
Section 1228 – Guidance on Inundated and Submerged Roads	Goal 3	In Progress	21

<b>Provision</b>	<b>Strategic Goal Alignment</b>	<b>Status</b>	<b>Page #</b>
Section 1229 – Extension of Assistance (DUA for PR & USVI)	Goal 3	Implemented	22
Section 1230(a) – Guidance and Recommendations (Common Interest Communities)	Goal 3	Implemented	22
Section 1230(b) – Guidance and Recommendations (Condos and Co-Ops)	Goal 3	In Progress	22
Section 1231 – Guidance on Hazard Mitigation Assistance (Acquisition)	Goal 1	Implemented	10
Section 1232 – Major Disaster Declaration Factors (Local Impact)	Goal 3	Implemented	5
Section 1233 – Additional Hazard Mitigation Activities (Earthquakes)	Goal 1	In Progress	10
Section 1234 – National Public Infrastructure Pre-Disaster Hazard Mitigation	Goal 1	In Progress	6
Section 1235(a) – Additional Mitigation Activities (Resilience)	Goal 1	In Progress	10
Section 1235(b) – Additional Mitigation Activities (PA Codes and Standards)	Goal 1	In Progress	11
Section 1236 – Guidance and Training on Coordination of Emergency Response Plans (Hazardous Materials)	Goal 1	Implemented	11
Section 1237 – Certain Recoupment Prohibited (Reliance on PA Technical Assistance Contractor)	Goal 3	Implemented	23
Section 1238(a) – Critical Document Fee Waiver	Goal 3	In Progress	23
Section 1238(b) – Private Nonprofit Childcare Facilities	Goal 3	Implemented	23
Section 1239 – Public Assistance Declaration Factors (Cost of Assistance Estimates)	Goal 3	In Progress	7
Section 1240 – Report on Insurance Shortfalls	Goal 1	In Progress	11
Section 1241 – Post-Disaster Building Safety Assessment	Goal 2	In Progress	14

<b>Provision</b>	<b>Strategic Goal Alignment</b>	<b>Status</b>	<b>Page #</b>
Section 1242 – Updates on National Preparedness Assessment	Goal 1	Implemented	12
Section 1243 – Report on Duplication in Non-Disaster Preparedness Grant Programs	Goal 3	In Progress	23
Section 1244 – Study and Report on Best Practices in Mortality Counts	Goal 3	In Progress	24
Section 1245 – Review of Assistance for Damaged Underground Water Infrastructure	Goal 3	In Progress	24
Section 1246 – Extension (Reasonable and Prudent Alternative)	Goal 3	Implemented	12

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