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STATEMENT FOR THE RECORD
On behalf of the
National Emergency Management Association

**Submitted to the House Committee on Transportation and Infrastructure
Subcommittee on Economic Development, Public Buildings, and Emergency Management**

FEMA Priorities for 2022; Stakeholder Perspectives

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Thank you, Chairwoman Titus, Ranking Member Webster, and distinguished members of the Committee for allowing me to testify today.

I am proud to represent the National Emergency Management Association (NEMA). NEMA represents the state emergency management directors of all 50 states, territories, and the District of Columbia. As Director of Vermont Emergency Management and on behalf of my colleagues in state emergency management, we thank you for holding this discussion on recommended priorities of the Federal Emergency Management Agency (FEMA) in 2022.

The relationship between federal, state, and local emergency management is unique in that each maintains separate authorities and capabilities but must rely on one another to save lives and protect property. State emergency management relies on the strength of our locals, so the success of FEMA is also determined by the strength of the states. The relationship between state and federal emergency management is sometimes stressed, but no disagreement cannot be overcome by understanding each other's priorities, remaining flexible, and maintaining the shared goal of focusing on disaster survivors. The ongoing COVID-19 pandemic response and recent change in administration gave the NEMA membership several opportunities to address continuous improvements with FEMA and we welcome the committee to this discussion as we look to 2022.

The state emergency managers applaud the recent strategic plan developed by FEMA and look forward to working with Administrator Criswell during implementation. To that end, many of the priorities outlined in this testimony can find congruency with the goals and objectives of the strategic plan.

STREAMLINING AND COORDINATING FEDERAL PROGRAMS

In partnership with the states, FEMA should pursue a comprehensive review, re-envisioning, and reform of emergency management policies and regulation to provide more flexibility for emergency managers to navigate increasingly complex challenges faced in a rapidly changing environment. Threats such as the ongoing pandemic, cybersecurity, climate change, infrastructure failures, and continuing natural hazards requires a streamlined and coordinated federal approach.

As a part of this re-envisioning, FEMA should conduct a review of headquarters-versus-regional decision-making roles and authorities to aid in streamlining and consistency. The relationship between FEMA headquarters and the regions must result in a common, fair, and equitable application of policy, guidance, and regulations across the country. COVID-19 demonstrated many of the shortcomings in the existing disconnect between FEMA headquarters and the regions. Throughout the pandemic states and FEMA Regions struggled to interpret guidance changes regarding eligibility of response activities and interpretation of these policies often differed from Region to Region. For example, the eligible uses of PPE depending on type of facility and occupation utilizing the PPE was very difficult for applicants to decipher and continues to be an issue throughout the country. Public Assistance program guidance assumes impact from disaster caused by natural hazards and it is often difficult to apply to other disasters such as pandemics or cyber-attacks. Simplifying guidance as well as interpretation to be as straightforward as possible will lessen the administrative burden on applicants as well as FEMA and will cost taxpayers less wasted time in fruitless deliberations.

NEMA recently approved three position papers that address other aspects of federal coordination and policy implementation. Submitted with this testimony to be entered into the Congressional Record, these papers address the following:

1. *Coordination of State Homeland Security Grant Program Guidance.* As emergency management and homeland security professionals, the membership of NEMA appreciates the need for grant programs to remain dynamic and meet emerging threats. FEMA and the department must develop a more collaborative process, however, to devise, evaluate, and implement proposed changes. Therefore, FEMA should encourage DHS to establish a codified review process for grant guidance that is properly vetted through the appropriate stakeholders.
2. *Interagency Collaboration.* With the continued maturation of the Cybersecurity and Infrastructure Security Agency (CISA), the need for collaboration with FEMA is paramount. Whether addressing cybersecurity threats or critical infrastructure protection activities, FEMA and CISA must work closely in the development of policies and regulations. An Integrated Program Office (IPO) seems the best logical way to ensure such policy is integrated, coordinated, and clarified for those charged with saving life and property in the response to a major event. This would further serve as an opportunity to coordinate policy and avoid negative consequences prior to major events through better integration at the federal level.
3. *Wildfire Policy.* Recent wildfires exposed gaps in assistance and flaws in the interpretation of existing policy. Leveraging federal grants for response or mitigation efforts becomes problematic when they do not have adequate allowances for some of the unique needs of fighting wildfires. In the long-term approach, state and local land managers can be proactive in lessening threats to communities, while federal land managers struggle to implement meaningful fuels reduction projects near communities. In total, there would be great benefit to federal agencies taking a more active role in protecting communities before, during, and after wildland fires originating on federal lands. The paper includes a robust set of recommendations touching nearly every aspect of FEMA response and recovery programs.

ADDRESSING EQUITY IN EMERGENCY MANAGEMENT

Disasters are indiscriminate in their impact. They do not distinguish between party affiliation, arbitrary borders, or income level. Emergency management programs and policies in this nation must recognize these qualities and evolve to meet the needs of all Americans. NEMA embraces the priorities outlined in the FEMA strategic plan to address equity in emergency management programs. This year the association created a new policy committee to address diversity and equity issues. FEMA can aid in this national effort by addressing, supporting, and cultivating an inclusive and diverse workforce representing the diversity of communities impacted by emergencies. This includes removing barriers inhibiting vulnerable and underserved populations from applying for and receiving aid after a disaster. The federal government should implement a universal application at the federal level for all disaster assistance programs, creating a more equitable and less burdensome process for survivors already experiencing some of the hardest times in their life.

Furthermore, NEMA encouraged FEMA to create a formalized process by which to evaluate whether existing or new disaster and non-disaster grant programs increase or decrease equity for disaster survivors, and do not aggravate any financial and social disparities that may exist prior to the event. In addressing these goals, however, FEMA should use caution in guarding against unintended consequences that could inadvertently reduce or limit assistance to those in need.

For example, layering additional grant requirements to address equity concerns can become an equity issue by applying a one-size fits all approach to all states and assuming all states have the same resources to meet additional grant requirements. We remain encouraged by FEMA's forwarding-leaning approach to garnering feedback for the preparedness grant programs and expect clear objectives to be outlined to address known equity challenges within the program themselves.

SIMPLIFY FEDERAL RECOVERY PROGRAMS

The ongoing response to COVID-19 and other, overlapping events presented a tidal shift in the view of emergency management at all levels of government. But where issues may arise during response, the true test of our capabilities and resiliency as a nation come in the recovery process. The past two years revealed several issues FEMA should address in 2022 and beyond, including:

- Working with the administration to clarify, improve, and add capacity to support the agency's role in long-term recovery. They should be the coordinating agency on behalf of the federal government with the authority to support federal functions across the disaster recovery spectrum.
- Raising the small project threshold of the Public Assistance program from \$131,100 to \$1 million, thereby reducing the complexity of recovery and expediting recovery dollars to disaster survivors. If FEMA remains unwilling to effect this change administratively, NEMA reiterates our support of H.R. 5641, the SPEED Recovery Act, introduced by Representative Graves.
- A review of the authorities, roles, and responsibilities of Consolidated Resource Centers (CRC). Originally intended as processing centers, CRCs morphed into bottlenecks in the recovery process, circumventing decisions made by Federal Coordinating Officers, and slowing processing of recovery funds at headquarters.
- An evaluation of the Individual Assistance (IA) Program to include eligibility indicators, funding amount, processes, and speed of resources to disaster survivors. IA should maintain a focus on the beginning of a disaster and a whole community approach in meeting the objectives of the needs of individuals.
- Immediately beginning the process of amending 44 C.F.R. Part 207 to allow for the rollover of management costs from one disaster to the next. This would provide each state an unfunded grant for both the Public Assistance Program and Hazard Mitigation Grant Program. It would also allow remaining funds after the close-out of a disaster to be available to build recovery and

mitigation capacity at the state and local levels, and more expeditiously close-out remaining disasters which may be more complicated and build resilience for the next disaster.

- A clarification of the challenges experienced by states as it relates to the sharing of personally identifiable information (PII) in the IA National Flood Insurance programs. FEMA should create a standardized information sharing form which disaster survivors can sign to allow the pertinent recovery agencies with identified resources or program support to receive their information.

INTEGRATING CLIMATE ADAPTATION PRIORITIES

Adapting to the more complex weather we experience and the consequences that come along with it require flexibilities to emergency response systems. Current programs lack the adequate guidance and support which helps manage these new extreme climate disasters. FEMA needs to strategically identify, prioritize, and invest in climate resilience projects that help reduce future losses. This would include coordinating interagency investments for consistency, efficiency, and maximum return.

In addition to a review of current programs through a more climate-conscious lens, FEMA should ensure the utilization of all reasonable and pertinent federal partnerships to achieve relief and recovery from all aspects of a disaster. This coordination of climate change relates to mitigation, preparedness, response, and recovery programs with other federal agencies – including risk, vulnerability, and consequence assessments. In doing this, FEMA must guard against simply adding “climate change” into existing guidance, verbiage, and doctrine. Efforts outlined at the federal level must be measurable to include benchmarks to determining success. Furthermore, program eligibility must incorporate the full spectrum of disasters exacerbated by climate change including wildfire and drought. Only through a whole-of-government approach can FEMA allow for adequate capacity to respond and with a focus on information sharing, it will allow programs to properly provide relief to victims as they work to recover.

CONCLUSION

On behalf of the state emergency managers, thank you again for holding this hearing on where FEMA should focus in the coming year. Collectively, emergency managers believe we must work together in building our respective capacities to respond, enhance equity in state and federal programs, and streamline FEMA programs to get assistance more quickly to the people who need it most. We can accomplish this by working together across all levels of government and ensuring the role of emergency management is clear regardless of the hazard. In doing all this, we look forward to continuing the strong relationship we have with this committee and with FEMA, and I welcome any questions.