

May 14, 2025

Office of Partnership and Engagement
U.S. Department of Homeland Security
2707 Martin Luther King Jr Ave. SE
Washington, DC 20032

RE: Docket No. DHS-2025-0013, Request for Public Input on Experiences with FEMA Disaster Responses

The Council of State Community Development Agencies (COSCD) welcomes the opportunity to provide comments regarding experiences with FEMA's disaster responses. COSCD represents state agencies that administer Department of Housing and Urban Development (HUD) programs related to community development, housing, homelessness, and disaster recovery. Our members frequently administer disaster recovery funding through HUD's Community Development Block Grant (CDBG-DR) program. Twenty-two State agencies—many of whom are COSCD members—received more than \$4.7 billion in the most recent [CDBG-DR allocation](#) in January 2025.

In general, COSCD recognizes that the nation's disaster response system is broken. Often, it takes far too long for relief to reach communities, and impacted households often do not know where to turn for assistance. COSCD supports thoughtful reforms to improve—rather than dismantle—FEMA and other disaster recovery initiatives. We offer constructive feedback and recommendations below from the perspective of state agencies who interact with FEMA as they manage their own disaster recovery programs.

Were local or state authorities or private groups able to provide assistance in a more timely or efficient way than FEMA? Please fully describe your experience.

Disaster recovery requires a coordinated response at several levels of government and non-governmental organizations. FEMA staff are often the “first responders” after a disaster occurs. Later, HUD grantees assist with longer-term housing and community recovery through the CDBG-DR program. We do not see the value in comparing the timeliness or efficiency of agencies that serve different purposes along different points in the disaster recovery process.

Instead, COSCD members would like to recognize the efficiency inherent in a federal disaster response agency (namely, FEMA). While some states (CA, OK, TN, IA, VT, LA, and KY) have experienced at least 20 disaster declarations in since 2011, others experience far less frequent disasters. Each state does not need highly trained disaster response personnel on staff. Rather, it is more efficient to maintain a federal workforce that the government can deploy to states to assist with response efforts when disasters occur. For that reason, COSCD members support maintaining at least a critical level of staff at FEMA.

What recommendations would you like the Council to make?

Improve data accessibility and exchange for timely disaster response and recovery.

State and local HUD disaster recovery administrators rely on data provided by FEMA, SBA, and HUD to inform Unmet Needs Assessments and survivor outreach. Access to client and community-specific data is currently made available through a Computer Matching Agreement (CMA) between DHS, FEMA, HUD, and CDBG-DR grantees. The 2024 CMA directs grantees to sign onto existing HUD-FEMA data sharing agreements rather than establishing their own agreements. However, the CMA has not been functioning as intended and CDBG-DR grantees still struggle to obtain the data needed to manage their programs.

FEMA and HUD should jointly permit CDBG-DR grantees to work directly with FEMA to obtain the data needed to quickly mobilize disaster recovery efforts. At the very least, HUD and FEMA should work to ensure all grantees and local staff understand the updated CMA and current streamlined procedures for data exchange.

Expand flexibility for FEMA's Individual Assistance to direct more meaningful, encompassing, and immediate support to disaster survivors.

Between complying with the requirements of FEMA's Duplication of Benefits (DOB) calculations and meetings immediate needs for their families, low- and moderate-income (LMI) families face enormous strain when working to access available aid. COSCDA is grateful for recent FEMA Individual Assistance (IA) updates that provided greater flexibility; however, it is unclear whether the updates have been fully implemented. COSCDA requests that FEMA and HUD work together on additional training and assistance.

COSCD A appreciates the opportunity to comment on our members' experiences with FEMA. We encourage the Council to carefully consider the implications of any changes to the structure of the agency. The federal government should work in tandem with state and local agencies to ensure timely, effective disaster recovery. Feel free to reach out to Jenna Hampton (jhampton@coscda.org), Director of Advocacy and Federal Programs or Tess Hembree (thembree@coscda.org), Executive Director for any further discussion with COSCDA.

Sincerely,



Tess Hembree
Executive Director, Council of State Community Development Agencies (COSCDA)