



May 2019

# DISASTER ASSISTANCE

## FEMA Action Needed to Better Support Individuals Who Are Older or Have Disabilities

This Report Is Temporarily Restricted Pending Official Public Release.

## Why GAO Did This Study

Three sequential hurricanes—Harvey, Irma, and Maria—affected more than 28 million people in 2017, according to FEMA. Hurricane survivors aged 65 and older and those with disabilities faced particular challenges evacuating to safe shelter, accessing medicine, and obtaining recovery assistance. In June 2018, FEMA began implementing a new approach to assist individuals with disabilities.

GAO was asked to review disaster assistance for individuals who are older or have disabilities. This report addresses (1) challenges FEMA partners reported in providing assistance to such individuals, (2) challenges such individuals faced accessing assistance from FEMA and actions FEMA took to address these challenges, and (3) the extent to which FEMA has implemented its new approach to disability integration.

GAO analyzed FEMA data and reviewed relevant federal laws, agency policy, and federal frameworks. GAO also interviewed state, territorial, local, and nonprofit officials in Florida, Puerto Rico, Texas, and the U.S. Virgin Islands; FEMA officials at headquarters, in regional offices, and deployed to disaster sites; and officials at relevant nonprofit organizations.

## What GAO Recommends

GAO is making seven recommendations to FEMA, including that it establish new registration questions, objectives for its new disability integration approach, and a training plan for FEMA staff. The agency concurred with all but one of the recommendations.

View [GAO-19-318](#). For more information, contact Elizabeth Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov).

## DISASTER ASSISTANCE

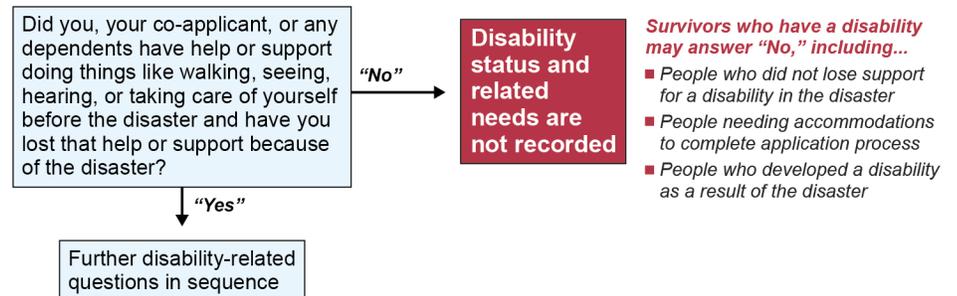
### FEMA Action Needed to Better Support Individuals Who Are Older or Have Disabilities

## What GAO Found

A range of officials from entities that partner with the Federal Emergency Management Agency (FEMA)—including states, territories, localities, and nonprofits—reported challenges providing assistance to individuals who are older or have disabilities following the 2017 hurricanes. For example, officials said that many of these individuals required specialized assistance obtaining food, water, medicine, and oxygen, but aid was sometimes difficult to provide. Officials in Puerto Rico and the U.S. Virgin Islands cited particular difficulties providing this assistance due to damaged roads and communication systems, as well as a lack of documentation of nursing home locations.

Based on GAO’s analysis of FEMA data and interviews with FEMA officials and stakeholders, aspects of the process to apply for assistance from FEMA after the 2017 hurricanes were challenging for older individuals and those with disabilities. According to stakeholders and FEMA officials, disability-related questions in the registration materials are confusing and easily misinterpreted. For example, FEMA’s registration process does not include an initial question that directly asks individuals if they have a disability or if they would like to request an accommodation for completing the application process (see figure below). While FEMA has made efforts to help registrants interpret the questions, it has not yet changed the language of the questions to improve clarity. As a result, individuals with disabilities may not have requested accommodations or reported having disabilities, which may have hindered FEMA’s ability to identify and assist them.

#### Sequence of Disability-Related Questions in FEMA’s Registration Process



Source: GAO analysis of Federal Emergency Management Agency (FEMA) documentation. | GAO-19-318

FEMA did not establish objectives before implementing its new approach to disability integration, which includes adding new disability integration staff in the regions and decreasing the number of disability integration advisors deployed to disaster sites. Without documented objectives for the new approach, regional leadership across the nation may implement changes inconsistently. In addition, the new approach shifts the responsibility for directly assisting individuals with disabilities to all FEMA staff. FEMA has taken some initial steps to provide training on the changes; however, it has not established a plan for delivering comprehensive disability-related training to all staff who will be directly interacting with individuals with disabilities. Developing a plan to train all staff would better position FEMA to achieve its intended goals and better equip deployed staff to identify and assist these survivors.

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## Abbreviations

ADA	Americans with Disabilities Act of 1990, as amended
CRCL	Department of Homeland Security Office for Civil Rights and Civil Liberties
DIA	Disability Integration Advisors
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
IA	FEMA's Individual Assistance program
IHP	FEMA's Individuals and Households Program
NRF	National Response Framework
ODIC	FEMA's Office of Disability Integration and Coordination
OMB	Office of Management and Budget
Post-Katrina Act	Post-Katrina Emergency Management Reform Act of 2006
Rehabilitation Act	Rehabilitation Act of 1973, as amended
RDIS	Regional Disability Integration Specialist
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended
TTY	Text Telephone

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May 14, 2019

Congressional Requesters

In the summer and fall of 2017, Hurricanes Harvey, Irma, and Maria affected more than 28 million people living in Texas, the U.S. Virgin Islands, Florida, and Puerto Rico and caused a combined \$265 billion in damage, according to the Federal Emergency Management Agency (FEMA), a component of the Department of Homeland Security. As we previously reported, the consecutive timing and scale of the disasters overwhelmed the capabilities of some local, state, and territorial governments, as well as nonprofit partners, to assist affected residents.<sup>1</sup>

Individuals affected by hurricanes and other large-scale disasters who are older or have disabilities can face particular challenges obtaining disaster assistance.<sup>2</sup> Some individuals who are older or have disabilities, and who otherwise function independently in their day-to-day lives, may rely on supports that disasters can interrupt. For example, the two suppliers of oxygen on the island of Puerto Rico lost production capabilities after Hurricane Maria due to a lack of power, which in turn threatened the health of the reported 50,000 Puerto Ricans who depended on oxygen, according to a disability rights organization's report.

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<sup>1</sup>GAO, *2017 Hurricanes and Wildfires: Initial Observations on the Federal Response and Key Recovery Challenges*, [GAO-18-472](#) (Washington, D.C.: Sept. 4, 2018). Because sections of this report focus on the impact of the 2017 hurricanes on populations in specific locations, we use the phrase "state, territorial, and local" to refer to the state, county, municipal, and territorial governments in the affected areas and the officials who run them. In generally referring to emergency management partners of the Federal Emergency Management Agency (FEMA) at nonfederal levels of government, we use the phrase "state and local." In this latter context, the phrase includes state, tribal, territorial, insular area, and local governments as well as the government of the District of Columbia.

<sup>2</sup>For the purposes of this report, the phrase "individuals with disabilities" refers to individual disaster survivors, including those who are 65 or older, who have a disability that affects their ability to evacuate, shelter, or recover from a disaster. Under federal civil rights laws, an individual with a disability is generally defined as an individual who has a physical or mental impairment that substantially limits one or more major life activities. FEMA provides specialized services to those with "access and functional needs," which includes, among others, individuals with disabilities, older adults, and individuals with limited English proficiency, limited access to transportation, and/or limited access to financial resources to prepare for, respond to, and recover from a disaster. For the purposes of this report, we use the term "individuals who are older" to refer to individuals who are age 65 or older, regardless of whether they have a disability or an access or functional need.

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Emergency management and private organization partners turned to FEMA for help, including from FEMA disability integration staff who were responsible for providing assistance to individuals with disabilities regardless of age.<sup>3</sup> However, the hurricanes also overwhelmed FEMA's available workforce, and the agency reported that it met approximately 50 percent of its target for deploying disability integration staff that could be deployed to the sites of the 2017 hurricanes and less than half of its target for the number of disability integration staff who were qualified.<sup>4</sup>

After the 2017 hurricane season, FEMA announced plans to reorganize its workforce to more thoroughly incorporate disability integration principles into all preparedness, response, and recovery activities nationwide and reduce reliance on FEMA's disability integration staff. This reorganization was announced to begin in June 2018, near the start of the 2018 hurricane season.

You asked us to review the federal government's response to the 2017 hurricanes with a focus on older adults and people with disabilities. This report is also one in a series that addresses the federal response to those disasters.

This report examines (1) challenges FEMA's partners reported in providing disaster assistance to individuals who are older or have disabilities; (2) challenges faced by these individuals in accessing FEMA's disaster assistance programs and actions FEMA has taken to address such challenges; and (3) the extent to which FEMA has implemented its new approach to disability integration.

To address our first and second objectives, we visited Florida, Puerto Rico, Texas, and the U.S. Virgin Islands in June and July 2018.<sup>5</sup> At each location we interviewed state or territory emergency managers, public health and human services officials, and representatives of nonprofit disability organizations. For example, we interviewed staff from Centers

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<sup>3</sup>Disability integration staff are responsible for focusing on inclusive practices in emergency management, and include those deployed to areas affected by disasters and those working permanently in FEMA's regional offices.

<sup>4</sup>FEMA, *2017 Hurricane Season FEMA After-Action Report* (Washington, D.C.: July 12, 2018).

<sup>5</sup>Hurricane Harvey primarily affected the Gulf Coast of Texas; Hurricane Irma primarily affected the U.S. Virgin Islands, Puerto Rico, and Florida; and Hurricane Maria primarily affected the U.S. Virgin Islands and Puerto Rico.

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for Independent Living in each location. To learn first-hand accounts of disaster-related challenges faced by individuals in Puerto Rico and the U.S. Virgin Islands who are older or have disabilities and who were impacted by the hurricanes, staff from the Centers for Independent Living in those locations invited us to interview 16 of their regular program participants. We interviewed local emergency managers in Texas and Florida in counties that were affected by Hurricanes Harvey and Irma. We also interviewed representatives of national organizations, selected for their focus on providing disaster assistance to individuals who are older or have disabilities. In addition, we interviewed officials from other relevant federal agencies and offices, including the Department of Homeland Security's (DHS) Office for Civil Rights and Civil Liberties (CRCL) and the National Council on Disability. To supplement information we obtained from the site visit interviews, we reviewed summaries of eight public listening sessions published by CRCL and co-hosted with FEMA across the four disaster locations between February 2018 and May 2018. While the perspectives of officials and stakeholders we interviewed, as well as those expressed during the public listening sessions, are not generalizable, they provide valuable insights into the federal response to the 2017 disasters.

To address our second objective regarding the disaster assistance FEMA provides, we obtained and analyzed summary data from FEMA's primary database on its registrations and awards for survivors of Hurricanes Harvey, Irma, and Maria. FEMA also provided disaster assistance data on registrations submitted by households with residents who are older and households with residents reporting disabilities. We also obtained and analyzed data from call centers that operate FEMA's helpline, including the number of incoming calls and the average wait time for answered calls for a given day. To assess the reliability of FEMA's data, we interviewed officials at FEMA headquarters about the quality of the data; reviewed existing information about the data systems; and conducted checks for inaccurate data and comparisons to publicly available summary data. We determined that the data we obtained were sufficiently reliable for the purposes of providing information on the number and characteristics of registrations for assistance FEMA collects and the number of calls to FEMA's call centers.

To address our third objective regarding FEMA's new approach to disability integration, we compared staffing levels before and after FEMA's workforce reorganization by obtaining and analyzing the number of disability integration staff deployed in response to the 2017 hurricanes and to Hurricanes Florence and Michael, which made landfall in

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September and October 2018. To assess the reliability of these data, we reviewed recent GAO work that assessed the reliability of FEMA workforce data from the same data source and reviewed the data for obvious errors and omissions.<sup>6</sup> We determined that the data we obtained were sufficiently reliable for the purposes of providing information on the deployed FEMA workforce in response to recent hurricanes. We also obtained and analyzed responses to structured questions about FEMA's new approach to disability integration from officials in FEMA's ten regions.

To address all three objectives, we assessed FEMA's efforts to assist individuals who are older or have disabilities against relevant criteria. We analyzed FEMA policies, procedures, guidance, and memoranda, including those specific to FEMA's Individuals and Households Program and disability integration. For example, we analyzed memoranda describing FEMA's plan to implement its new approach to disability integration and the agency's policy on data-sharing. We also reviewed FEMA's internal self-evaluation of its policies and practices, which it conducted to evaluate how effectively FEMA provides equal physical, program, and communication access to people with disabilities.<sup>7</sup> We assessed these documents against goals and objectives in FEMA's 2018-2022 Strategic Plan, DHS policy for ensuring nondiscrimination for individuals with disabilities, and federal standards for internal control related to communicating effectively internally and externally, using quality information to achieve objectives, and defining objectives in measurable terms.<sup>8</sup> We reviewed relevant information from our prior reports on FEMA's work,<sup>9</sup> as well as The Partnership for Inclusive

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<sup>6</sup>[GAO-18-472](#)

<sup>7</sup>FEMA completed its self-evaluation in August 2017 and officials told us they have plans to publish a plan for addressing issues identified in the self-assessment in 2019. GAO reviewed the self-evaluation and a draft implementation plan in December 2018.

<sup>8</sup>See FEMA, *2018-2022 Strategic Plan*, March 15, 2018; DHS Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*, Sept. 25, 2013; GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>9</sup>[GAO-18-472](#); *Federal Disaster Assistance: FEMA's Progress in Aiding Individuals with Disabilities Could Be Further Enhanced*. [GAO-17-200](#), (Washington, D.C.: Feb. 7, 2017); and *Actions Taken to Implement the Post-Katrina Emergency Management Reform Act of 2006*, [GAO-09-59R](#) (Washington, D.C.: Nov. 21, 2008).

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Disaster Strategies' 2018 After Action Report.<sup>10</sup> We did not independently assess whether any programs or activities conducted by FEMA or its partners during the period covered by our review complied with applicable non-discrimination or civil rights laws.

We also interviewed FEMA officials from headquarters and staff deployed to each disaster location, including staff focused on assisting individuals with disabilities. We interviewed former FEMA officials, including a previous FEMA administrator, for historical perspective on the changes FEMA is making to disability integration.

We conducted this performance audit from April 2018 to May 2019, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Further information on our scope and methodology can be found in appendix I.

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## Background

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### Aging and Disability in Disasters

Older individuals and individuals with disabilities, whose needs may overlap, may face particular risks in disasters, including hurricanes. According to AARP, older persons may be disproportionately vulnerable to disasters because they are more likely to have chronic illnesses, functional limitations, and sensory, physical, and cognitive disabilities than those who are younger.<sup>11</sup> Following Hurricane Katrina in 2005, the National Council on Disability noted that the basic needs of people with

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<sup>10</sup>This report incorporated the perspectives of stakeholders who were working in disaster-impacted communities and thousands of callers to a hotline managed by The Partnership to address the needs of survivors of the 2017 hurricanes. The Partnership for Inclusive Disaster Strategies, *Getting It Wrong: An Indictment with a Blueprint for Getting It Right. Disability Rights, Obligations and Responsibilities Before, During and After Disasters* (May 2018).

<sup>11</sup>Mary Jo Gibson, *We Can Do Better: Lessons Learned for Protecting Older Persons in Disasters* (Washington, D.C.: AARP, 2006).

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disabilities were compounded by chronic health conditions and functional impairments, including blindness, hearing deficiencies, mobility impairments, and mental health conditions.<sup>12</sup> As a result of chronic health conditions and functional limitations, older persons may often take multiple medications, rely on caregivers for assistance, and experience general “frailty.” In particular, individuals who are frail or who have disabilities and who live alone or in isolated rural areas may be more vulnerable to the effects of disasters like hurricanes.

According to 2017 Census estimates, 15.4 percent of the U.S. population not living in an institution is 65 or older, and 12.7 percent has a disability. More than one-third (34.6 percent) aged 65 or older has a disability, and 42.1 percent of those with disabilities are 65 or older.<sup>13</sup>

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## State and Local Disaster Assistance

State and local governments are primarily responsible for disaster management, but the federal government, as well as the nonprofit and business sectors, can provide critical support if those entities need assistance. The National Response Framework (NRF) defines the roles of entities that respond to all types of incidents, such as hurricanes and other disasters, including local and state governments, the federal government, the private sector, and voluntary organizations. One of the NRF’s core principles is that response efforts must adapt to meet evolving demands resulting from changes in disaster size, scope, and complexity.

Under the NRF, state and local agencies are primarily responsible for response and recovery activities in their jurisdictions, including those involving health and safety. For example, state and local agencies are primarily responsible for carrying out evacuations and administering shelters, when necessary, for those affected by a disaster. In addition, the NRF emphasizes the importance of state and local emergency management agencies coordinating disaster assistance with the private sector. In particular, organizations composing states’ and localities’ critical infrastructure—such as private hospitals—may serve as partners in disaster preparedness and response. As part of their responsibilities, state and local governments provide financial and nonfinancial disaster

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<sup>12</sup>National Council on Disability, *The Impact of Hurricanes Katrina and Rita on People with Disabilities: A Look Back and Remaining Challenges* (Washington, D.C.: Aug. 3, 2006).

<sup>13</sup>Data were obtained from the 2017 American Community Survey. Estimates have a margin of error at the 90 percent confidence interval of plus or minus 0.1 percentage points.

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assistance, and work alongside FEMA staff and voluntary organizations to connect disaster survivors with outside resources. Certain types of assistance, such as evacuations and sheltering, can happen before the disaster and are particularly important for people who are older or have disabilities. Some states, including Texas and Florida, established voluntary registries for residents who may need specialized assistance in an emergency. In states that offer a registry, residents who depend on a consistent source of electricity to power medical equipment, for instance, might opt to register as a way of communicating their need for access to generator power in the case of a widespread power outage.

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## Federal Disaster Assistance

When needs for assistance resulting from a disaster exceed or are expected to exceed state or local resources, the federal government may use the NRF to involve all necessary federal department and agency capabilities and ensure coordination with response partners. The Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act)<sup>14</sup> outlines the process state and local governments can use to obtain federal support under the act in response to a disaster. First, a state's governor must submit a request to the President to declare a major disaster in the state.<sup>15</sup> If the President grants the declaration, the state becomes eligible for various types of assistance from FEMA, such as personnel, funding, and technical assistance, among others. In the case of a federally declared disaster under the Stafford Act, FEMA has primary responsibility for coordinating the federal response, and it targets the level of federal support to the needs specified by states' requests for assistance. FEMA staff deployed to disasters work alongside state counterparts and voluntary organizations at a centralized location, called

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<sup>14</sup>See generally 42 U.S.C. § 5121 *et seq.*; 44 C.F.R. pt. 206.

<sup>15</sup>The governor's request shall be based on a finding that the disaster is of such severity and magnitude that effective response is beyond the capabilities of the state and the affected local governments and that federal assistance is necessary. A major disaster is defined as any natural catastrophe (e.g., a hurricane, tornado, snowstorm, or earthquake) or, regardless of cause, any fire, flood, or explosion, in any part of the U.S., which in the determination of the President causes damage of sufficient severity and magnitude to warrant major disaster assistance under the act to supplement the efforts and available resources of states, local governments, and disaster relief organizations. An emergency is defined as any occasion or instance for which, in the determination of the President, federal assistance is needed to supplement state and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the U.S. 42 U.S.C. §§ 5170, 5122; 44 C.F.R. §§ 206.31-206.48. For purposes of this report, we focus only on presidentially-declared major disasters.

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the joint field office, to coordinate disaster response and recovery efforts.<sup>16</sup>

One of the main forms of federal assistance comes through FEMA's Individuals and Households Program (IHP), one of six subprograms under FEMA's Individual Assistance (IA) program.<sup>17</sup> IHP provides financial and direct assistance to eligible individuals and households who have uninsured or underinsured necessary expenses and serious needs.<sup>18</sup> Under IHP, individuals can receive two types of assistance: housing assistance and other needs assistance.

- Housing assistance can come in the form of financial or direct assistance for temporary housing, home repairs, replacement of a primary home, or in limited locations, permanent housing construction when needed due to disaster effects.<sup>19</sup> To receive housing assistance, individuals typically must participate in a home inspection to verify certain information required to determine eligibility, including damage and loss.
- Other needs assistance provides financial assistance to replace or repair uninsured or underinsured personal property, or support disaster-related needs, such as transportation, funeral, medical, and child care assistance.

To receive FEMA assistance under IHP, individuals must register by answering a standard series of registration intake questions. The

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<sup>16</sup>Federal leadership at the joint field office includes the Federal Coordinating Officer and the Chief of Staff, among others.

<sup>17</sup>In addition to Individual Assistance, FEMA also provides disaster recovery funding assistance through its Public Assistance and Hazard Mitigation Grant programs. The Public Assistance program primarily provides supplemental federal disaster grant assistance to state, local, tribal, and territorial governments, and certain types of private nonprofit organizations for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly-owned facilities and the facilities of certain private nonprofit organizations. The Hazard Mitigation Grant Program is designed to improve community resilience and funds a wide range of projects, such as purchasing properties in flood-prone areas, adding shutters to windows to prevent future damage from hurricane winds and rains, and modifying culverts in drainage ditches to prevent future flooding damage.

<sup>18</sup>See 42 U.S.C. § 5174; 44 C.F.R. §§ 206.101-206.120.

<sup>19</sup>Permanent housing construction assistance may be available in insular areas outside the continental United States (such as the U.S. Virgin Islands) and other locations in which alternative housing resources are not available and other temporary housing assistance is unavailable, infeasible, or not cost-effective.

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registration intake process is designed to solicit relevant information from individuals to determine their eligibility for certain FEMA disaster assistance programs.<sup>20</sup> The process collects some basic demographic information, including name, age, number of people living in the household, and how they were affected by the disaster. It also requires individuals to report financial information, such as insurance status, which may affect eligibility for certain programs. Individuals can register by phone using a toll-free helpline, which includes Text Telephone (TTY) and Video Relay Service capabilities for individuals who are deaf, hard of hearing, or have a speech disability; via the internet or a smartphone; or in person at Disaster Recovery Centers. According to FEMA, Disaster Recovery Centers are usually opened quickly after a disaster for a limited period of time, are equipped to accommodate those who need disability-related communication aids, and are established in coordination with state and local governments. Also according to FEMA, staff are available to assist individuals registering for assistance through the helpline, at Disaster Recovery Centers, and in their communities.

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## Legal Protections for Older Individuals and Those with Disabilities and Inclusive Emergency Management Practices

In emergency management, disability integration includes incorporating inclusive practices and applicable requirements related to individuals with disabilities—such as those that may apply under the Rehabilitation Act of 1973 (Rehabilitation Act) or the Americans with Disabilities Act of 1990 (ADA), both as amended—into all aspects of emergency preparedness and disaster response, recovery, and mitigation.<sup>21</sup> The Rehabilitation Act, among other things, prohibits discrimination on the basis of disability by the federal government, federal contractors, and by recipients of federal

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<sup>20</sup>Based on applicants' registration responses, FEMA may also provide referrals to other agencies or nonprofits.

<sup>21</sup>Under the Rehabilitation Act and the ADA, an individual with a disability includes any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.

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financial assistance.<sup>22</sup> The ADA establishes certain non-discrimination and other requirements for employers, state and local governments, public accommodations, and telecommunication services with respect to people with disabilities.<sup>23</sup> In addition, the Post-Katrina Emergency Management Reform Act of 2006 (Post-Katrina Act) amended the Stafford Act to prohibit discrimination on the basis of disability by personnel carrying out federal assistance functions at the site of a major disaster, including distributing supplies, processing applications, and other relief and assistance activities.<sup>24</sup>

Inclusive practices are intended to ensure people with disabilities have equal opportunities to participate in, and receive the benefits of, emergency management programs and services. Such practices could include involving people with disabilities in emergency evacuation planning, ensuring that shelters are physically accessible, and providing guidance on post-evacuation residency for individuals with disabilities. FEMA's administrator appointed a Disability Coordinator to comply with a requirement in the Post-Katrina Act.<sup>25</sup> Under the Post-Katrina Act, the Disability Coordinator is responsible for ensuring coordination and dissemination of best practices and the development of training materials for emergency managers on the needs of individuals with disabilities,

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<sup>22</sup>29 U.S.C. § 701 *et seq.* Section 504 of the Rehabilitation Act provides that no otherwise qualified individual with a disability shall, solely on the basis of the disability, be excluded from the participation in, denied the benefits of, or be subjected to, discrimination under any program or activity that receives federal financial assistance, or any program or activity conducted by federal executive agencies. 29 U.S.C. § 794. Section 508 generally requires federal agencies to ensure that their electronic and information technology is accessible to individuals with disabilities, including employees and the public. In particular, it requires that members of the public with disabilities seeking information or services from a federal agency have access to and use of information and data that is comparable to the access and use by members of the public who do not have disabilities. 29 U.S.C. § 794d. In 2013, DHS issued Directive 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment), which included a requirement for DHS components – including FEMA – to (1) conduct a self-evaluation of their programs and activities to identify any barriers to access and any gaps in existing component policies or procedures for providing reasonable accommodations; and (2) develop a plan that addresses any identified barriers and documents the components' disability policies.

<sup>23</sup>42 U.S.C. § 12101 *et seq.*

<sup>24</sup>See 42 U.S.C. § 5151(a). Other laws also establish protections for individuals with disabilities that may apply to federal, state, local, and/or private organizations involved in disaster response, such as the Fair Housing Act of 1968, as amended.

<sup>25</sup>See 6 U.S.C. § 321b.

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among other things. In 2010, FEMA created the Office of Disability Integration and Coordination (ODIC), which was designed to promote inclusive practices for assisting disaster survivors with disabilities.<sup>26</sup>

Other laws establish non-discrimination protections for individuals based on age, which may also apply to federal, state, local, or private organizations involved in emergency management. Specifically, the Stafford Act prohibits discrimination on the basis of age by personnel carrying out federal assistance functions at the site of a major disaster.<sup>27</sup> In addition, the Age Discrimination Act of 1975, as amended, provides that no person shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving federal financial assistance.<sup>28</sup>

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## Federal Assistance for Individuals with Disabilities, Including those Who Are Older, In Response to the 2017 Hurricanes

FEMA staff who are responsible for focusing on inclusive practices in emergency management include those deployed to areas affected by disasters and those working permanently in FEMA's regional offices. In 2017 and earlier, FEMA deployed staff called disability integration advisors (DIA) to identify and recommend courses of action to meet the needs of disaster survivors with disabilities. DIAs were expected to help individuals with disabilities, including those who are older, with accessing assistance such as temporary housing, medical equipment, food, and shelter. They were also expected to work beside other FEMA staff who worked directly with individuals, such as those on Disaster Survivor Assistance Teams, which go door-to-door to meet people in their communities.

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<sup>26</sup>We reported in 2017 that despite steps FEMA had taken to improve disaster services for people with disabilities, it had not established procedures to help ensure regions consistently involve FEMA's Office of Disability Integration and Coordination (ODIC) in their disability integration activities. We also reported that ODIC's approach to delivering disability integration training was limited. We recommended that FEMA establish written procedures for involving ODIC in regional activities; set goals for disseminating disability integration training; and evaluate alternative delivery methods for the training. FEMA agreed with the recommendations, and has efforts underway to address them. See GAO, *Federal Disaster Assistance: FEMA's Progress in Aiding Individuals with Disabilities Could Be Further Enhanced*, [GAO-17-200](#) (Washington, D.C.: Feb. 7, 2017).

<sup>27</sup>See 42 U.S.C. § 5151(a).

<sup>28</sup>See 42 U.S.C. § 6102.

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In 2017 and earlier, disability integration staff working permanently in FEMA’s regional offices, known as Regional Disability Integration Specialists (RDISs), were responsible for promoting inclusive practices through outreach to state and local emergency managers in all locations, whether or not they had recently been affected by a disaster. RDISs were also generally expected to track information about service and support shortfalls and demographics in each FEMA region, such as local and state statistics on individuals who are deaf or hard of hearing, to help keep track of what FEMA should be prepared to address in a disaster. According to FEMA officials, the specific job responsibilities of a RDIS, both prior and subsequent to 2017, may vary from region to region, as each Regional Administrator determines the staffing structure that meets the emergency management needs for his or her region.<sup>29</sup>

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### Revised Approach for Assisting Individuals with Disabilities, Including Those Who Are Older

In June 2018, FEMA officials began implementing a new approach to disability integration. According to FEMA officials, this new approach was intended to incorporate lessons learned from the 2017 hurricane season.

### Disability Integration Staff in the Regions

FEMA officials recommended that Regional Administrators add new disability integration staff in each of the regions to foster day-to-day relationships with state and local emergency managers and disability partners (see table 1). These new staff, whom FEMA also refers to as DIAs, would work with state and local emergency management agencies to advise and support emergency managers on inclusive practices. These regionally-placed DIAs would help develop relationships between state and local emergency managers and the disability community to build capacity and a culture of preparedness. Under the new disability integration approach, the role of the RDIS remains largely the same with the exception of coordinating with regionally-placed DIAs on disability integration.

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<sup>29</sup>Regional Administrators in each of the regional offices report directly to the FEMA Administrator and are responsible for the day-to-day management and administration of regional activities and staff.

**Table 1: Former and New Models for Staffing FEMA’s Disability Integration Approach in the Regions**

Staff		Former Model (2017)	New Model (2018)
New position: Disability Integration Advisors (DIAs) assigned to work with state and local emergency managers	<i>Number and location</i>	Not Applicable	<ul style="list-style-type: none"> <li>DIAs assigned to work with state and local emergency managers in coordination with RDISs</li> </ul>
	<i>Role</i>	Not Applicable	<ul style="list-style-type: none"> <li>Support state and local emergency managers by advising on inclusive emergency management principles and practices</li> <li>After a disaster declaration, advise the Federal Coordinating Officer on capabilities of impacted area and leverage existing relationships with on-the-ground partners</li> </ul>
Regional Disability Integration Specialists (RDISs)	<i>Number and location</i>	<ul style="list-style-type: none"> <li>One RDIS in each of the 10 FEMA regions</li> </ul>	<ul style="list-style-type: none"> <li>One RDIS in each of the 10 FEMA regions</li> </ul>
	<i>Role</i>	<ul style="list-style-type: none"> <li>Promote inclusive practices to local emergency managers</li> <li>Track service and regional statistics on individuals with disabilities to inform disaster preparedness</li> <li>Deploy to disaster locations</li> <li>Conduct outreach, education, and training to state and local partners; support FEMA regional program offices</li> </ul>	<ul style="list-style-type: none"> <li>In addition to their previous role, RDISs serve as team lead for DIAs working in state partnership</li> </ul>

Source: GAO analysis of Federal Emergency Management Agency (FEMA) documentation and interviews with FEMA officials as of April 2019. | GAO-19-318

**Deployment of Disability Integration Staff**

FEMA officials also made changes to how the agency deploys disability integration staff (see table 2). The new deployment model for disability integration staff was designed to shift the responsibility of assisting individuals with disabilities from DIAs to all FEMA staff, such as those registering people for individual assistance. To implement this new model, FEMA plans to train all the agency’s deployable staff and staff in programmatic offices on disability issues during response and recovery deployments. According to FEMA, a smaller number of DIAs would deploy to advise FEMA leadership in the field during disaster response and recovery.

**Table 2: Former and New Models for Deploying FEMA Disability Integration Staff**

Staff		Former Model (2017)	New Model (2018)
Deployed Disability Integration Advisors (DIAs)	<i>Number deployed per disaster</i>	<ul style="list-style-type: none"> <li>Average peak deployment of 55 DIAs to 2017 hurricane affected locations</li> </ul>	<ul style="list-style-type: none"> <li>Start with 5, scale up as needed</li> </ul>
	<i>Role</i>	<ul style="list-style-type: none"> <li>Assist federal, state, and local emergency managers on accessibility issues</li> <li>Directly assist individuals with disabilities, including those who are older</li> </ul>	<ul style="list-style-type: none"> <li>Advise Joint Field Office leadership and programmatic offices, including Individual Assistance Branch Chief, among others, on integrating disability principles throughout FEMA's response and recovery efforts</li> <li>No longer providing direct assistance to individuals with disabilities</li> </ul>
Other deployed FEMA staff, including from Disaster Survivor Assistance Teams	<i>Role</i>	<ul style="list-style-type: none"> <li>Partner with DIAs to assist disability-related cases</li> </ul>	<ul style="list-style-type: none"> <li>After receiving training on disability competencies, directly assist individuals who are older or have disabilities</li> </ul>

Source: GAO analysis of Federal Emergency Management Agency (FEMA) documentation and interviews with FEMA officials as of April 2019. | GAO-19-318

As discussed later in this report, FEMA deployed disability integration staff under its new model for 2018 disasters, but implementation of FEMA's new model for disability integration in the regions was ongoing as of May 2019.

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**Officials from States, Territories, Localities, and Nonprofits in our Review Reported Challenges Providing Targeted, Timely Assistance to Individuals Who are Older or Have Disabilities**

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**State, Territorial, Local, and Nonprofit Officials Reported Difficulty Providing Critical Goods and Services**

Territorial, local, and nonprofit officials from all four locations in our review, as well as survivors we interviewed from the U.S. Virgin Islands, reported that the substantial damage caused by the 2017 hurricanes prevented or slowed critical assistance for some individuals who are older or have disabilities. State, territorial, and local governments and nonprofit organizations provided some of this assistance—such as food, water, and medical care—to the general population following the hurricanes. However, some individuals who are older or have disabilities may have required specialized assistance, such as help filling medication prescriptions or equipment to maintain health and independence. Many of the challenges associated with responding to individuals' basic needs were exacerbated in Puerto Rico and the U.S. Virgin Islands. As we previously reported, a number of major factors affected response to Hurricanes Irma and Maria—including debilitated power grids, communication systems, and transportation infrastructure—and limited local preparedness for large, consecutive hurricanes.<sup>30</sup>

**Food and Water**

According to territorial and nonprofit officials in Puerto Rico and the U.S. Virgin Islands, as well as survivors we interviewed in the U.S. Virgin Islands, some individuals who are older or have disabilities experienced difficulty obtaining needed food and water due to centralized distribution

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<sup>30</sup>[GAO-18-472](#).

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models. For example, Maria significantly diminished transportation capabilities in Puerto Rico and, according to officials from one nonprofit organization, the majority of food and water was distributed to centralized locations around the island as a result. Those officials said this posed a major barrier to people with mobility challenges or without caregivers receiving food and water. Officials from one governmental agency in Puerto Rico reported that some had to rely instead on local or federal officials to deliver these items to their homes, which took time and in some cases, did not happen. In addition, nonprofit officials and survivors we interviewed in the U.S. Virgin Islands indicated that the food available posed medical dietary risks to some older people and people with disabilities because it was high in sugar, fat, and salt.<sup>31</sup>

## Medication and Medical Care

Government and nonprofit officials in Puerto Rico and the U.S. Virgin Islands, as well as individual survivors themselves, reported that individuals who are older or those with disabilities sometimes had difficulty accessing resources critical to sustaining health. In particular, territorial and nonprofit officials and individuals we spoke to highlighted challenges Maria survivors faced in obtaining needed medication—as well as oxygen—in Puerto Rico and the U.S. Virgin Islands. Territorial health officials in Puerto Rico explained that the sustained power outage and diminished transportation capabilities affected Puerto Rico’s two oxygen producers’ ability to sufficiently supply the island.<sup>32</sup> Also, according to officials from one Puerto Rico nonprofit, individuals who needed electricity to power respirators or continuous positive airway pressure machines had to rely on gas-powered generators which were also in short supply. In addition, one Independent Living Center participant we interviewed in the U.S. Virgin Islands told us that while he was able to get one of his regular prescriptions from a local clinic, none of the pharmacies on the island had the stock to fill it. A second participant told us that the price of the medication she needed to treat her diabetes

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<sup>31</sup>According to the Academy of Nutrition and Dietetics, diets high in sodium, high-fat dairy products, and sweets can increase the risk of hypertension and mortality. Older adults, who often have multiple medical conditions requiring them to alter their dietary intake, can effectively manage these conditions through nutrition.

<sup>32</sup>In its after-action report/improvement plan, the Puerto Rico Department of Health reported that it did not have enough assets to fulfill healthcare facilities’ requests for medical supplies, including oxygen. Government of Puerto Rico, Department of Health, *Hurricanes Irma and María, PRDH Emergency Operations, After-Action Report/Improvement Plan*, Rev. 2017 508 (Dec. 20, 2017).

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Shelter Services, Disaster-related Information, and Transportation

had more than doubled since Maria, which she attributed to a lack of supply.

According to territorial officials from the U.S. Virgin Islands and officials from one Puerto Rico nonprofit, a number of local medical facilities—including hospitals—in the U.S. Virgin Islands and Puerto Rico sustained substantial damage, impairing their ability to treat the local community. Officials from one nonprofit in the U.S. Virgin Islands said that some individuals were admitted to hospitals and nursing homes off the island despite needing only routine treatment, such as dialysis. In Puerto Rico, hospitals lacked clinical staff and treated only those with the most critical health concerns, according to officials from one nonprofit, leaving some individuals without treatment.

Individuals who are older or have disabilities affected by the 2017 hurricanes also may have faced challenges accessing services from local shelters, according to state, territorial, local, and nonprofit officials we interviewed in all four locations. Officials from each of the four disaster locations reported examples of challenges accessing basic shelter services, including restrooms and food. For example, nonprofit officials in Florida and Puerto Rico described instances of shelter residents holding up sheets around other residents whose impairments prevented them from accessing the restrooms so that they could relieve themselves in common spaces of the shelter.

Disaster-related information, which equips those affected by a disaster to make decisions about evacuating, sheltering, and returning home, was inaccessible to people with certain disabilities, according to local and nonprofit officials we interviewed in all four disaster locations.<sup>33</sup> In interviews with these officials we heard multiple examples of the challenges faced by people with hearing impairments to getting timely and accurate information. For example, nonprofit officials in the U.S. Virgin Islands explained that the only source of disaster-related

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<sup>33</sup>Throughout this report, we use the terms “accessible” or “inaccessible” as they were used in our interviews or in documents we reviewed; however, we did not independently evaluate whether any programs or activities discussed in this report met any applicable legal standards for accessibility.

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information there was the radio, so residents with hearing impairments had to rely on friends and neighbors to relay the information.<sup>34</sup>

State, territorial, local, and nonprofit officials we spoke to reported that transportation was a substantial challenge for all of the affected locations following the 2017 disasters, but was especially challenging for those who relied on public transportation or were unable to walk long distances, such as people who were older or have disabilities (see fig. 1). Florida state officials reported that few public transportation services, including paratransit, were functional following Hurricane Irma. This may have prevented some people who are older or have disabilities from evacuating to shelters before Irma and from maintaining their health and wellness—for example, by shopping for groceries or going to medical appointments—after the storm, according to state officials.

**Figure 1: Storm Damage in St. Croix, the U.S. Virgin Islands**



**This sidewalk connected a busy bus stop to the island's only hospital.**

Source: GAO. | GAO-19-318

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<sup>34</sup>According to one FEMA official, FEMA made efforts to reach Virgin Islanders with hearing impairments. For example, FEMA made interpreters available at Disaster Recovery Centers, at FEMA press conferences, and on social media.

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## Officials From Puerto Rico and the U.S. Virgin Islands Said They Faced Challenges Locating People Who are Older or Have Disabilities

Officials we spoke to from territorial governments and nonprofits said they had difficulty locating people who are older or have disabilities following the 2017 hurricanes, which made providing disaster assistance challenging. In Puerto Rico, nonprofit and territorial government officials involved in responding after Irma and Maria explained that at that time no government entity maintained a list of nursing homes for people who are older or have disabilities. Because communication capabilities were nonexistent for a number of weeks across most of the island, these officials explained that government and nonprofit staff were dispatched as a task force to physically locate these facilities. Task force members identified individuals living at home or in residential facilities, conducted wellness checks, and distributed food, water, and other goods. According to territorial and nonprofit officials, a very small percentage of older Puerto Ricans live in nursing homes, while most live in their own homes, which can be difficult to reach. Officials in Puerto Rico reported identifying 503 licensed nursing homes, with an average of approximately 20 residents per facility, according to a list one territorial government agency compiled in early 2018. One nonprofit official noted that the search for those in institutions took more than a month.

Territorial and nonprofit officials in the U.S. Virgin Islands reported similar difficulties, with one territorial official explaining that residents with disabilities who do not access government services are a challenge to identify, and therefore, assist. One nonprofit official described commissioning a bus to travel around the island of St. Croix to identify people with disabilities in need, most of whom lived alone. According to one territorial official, the challenge of identifying people was compounded by a general stigma associated with disabilities in the U.S. Virgin Islands. In addition, some Virgin Islanders with disabilities protected under the ADA may not self-identify as a person with a disability, according to FEMA officials we spoke with who were deployed there. To address these challenges, territorial and nonprofit officials in Puerto Rico and the U.S. Virgin Islands, as well as an individual survivor in the U.S. Virgin Islands, told us they supported the idea of some type of registry responders could use to locate people who are older or have disabilities.

Texas and Florida operate registries to help local governments prepare to assist residents with disabilities during evacuations and sheltering, but state, local, and nonprofit officials in those locations reported that confusion about the registries limited their effectiveness. According to state officials in Texas, that state's registry provides local emergency

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management officials with information about the needs in their community, especially with regard to individuals with disabilities and other access and functional needs. However, representatives of state, local, and nonprofit agencies reported a general misconception among residents that signing up for Texas' registry would guarantee direct evacuation or transportation assistance. Florida's registry similarly provides local emergency managers with information to prepare for disasters, especially related to sheltering for people with disabilities. State residents who are registered may access special needs shelters, which are required by state law and typically provide electricity and oxygen, according to state, local, and nonprofit officials. However, state and nonprofit officials said residents were sometimes unsure about whether the special needs shelters were appropriate for them, which may have resulted in delayed registrations, residents registering who did not need to, or under-registration. Officials from Texas expressed concerns that confusion about the registries would lead to residents' overreliance on public disaster services. In addition, state and local officials in both states said a late influx of registrations complicated their states' response efforts. Texas state officials said they saw a 200-percent spike in registrations in the days after Hurricane Harvey was forecast to hit the state, while officials from one Florida county reported that 800 county residents registered for the first time during the 4 days before Irma's landfall. Employees in that county tried to call each registrant directly to get more information about their needs, and the late registrations made this difficult, according to officials.

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### A Lack of Timely Data from FEMA Hampered Some Partners' Efforts to Target Assistance

Officials we interviewed from Texas, Florida, and Puerto Rico reported difficulty obtaining FEMA data that could help them deliver assistance to individuals, including those who are older or have disabilities.<sup>35</sup> These officials explained that data—including names and addresses—showing who has registered for and received Individual Assistance from FEMA's disaster assistance programs can help local governments and nonprofits identify who in their community needs assistance. For example, nonprofit officials in Puerto Rico said they could have more effectively provided people with disabilities donated goods sent from all over the world if they knew who requested similar items from FEMA. In addition, FEMA data can help jurisdictions identify which community residents with disabilities

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<sup>35</sup>Officials from the U.S. Virgin Islands did not note this as a challenge to their efforts to provide disaster assistance to individuals who are older or have disabilities.

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have not applied for FEMA assistance, and local officials said they can use this information to target individuals who may need help with FEMA's registration process. Finally, officials explained that FEMA's data could inform recovery efforts by helping local officials identify parts of the community that were underserved by FEMA assistance or that may need assistance after a FEMA program ends.<sup>36</sup>

Texas officials from two counties said they made multiple requests for FEMA's registrant data, which they hoped to use to canvass areas of their counties to offer assistance, including helping people apply for FEMA financial assistance. One county eventually obtained data from FEMA more than 4 months following Harvey after applying constant pressure on FEMA, according to officials. Florida state officials reported that their request for information on older residents receiving FEMA Transitional Sheltering Assistance was denied. They intended to share it with affected counties that needed to plan sustainable housing options for those recipients when FEMA's program ended. According to officials, the denied request delayed counties' ability to plan for sustainable housing after the storm.

According to FEMA officials, the agency has broad authority to share its data on registrations, and follows the framework established under the Privacy Act of 1974 on the collection, use, maintenance, and

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<sup>36</sup>FEMA assistance may be subject to financial and/or time limits, depending on the program. For example, Transitional Sheltering Assistance is approved for an initial period of 5-14 days, which may be extended for up to 6 months. The Disaster Recovery Reform Act of 2018, among other things, increased the amount of assistance available to individuals with disabilities under IHP, including allowing accessibility repairs for people with disabilities without counting those repairs against their maximum disaster assistance grant award.

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dissemination of personally identifiable information.<sup>37</sup> Generally, FEMA uses two types of agreements—FEMA-State Agreements and Information Sharing Access Agreements—to establish the terms and conditions of how it will share its data.<sup>38</sup> According to officials, these agreements are disaster-specific and are established after a disaster is declared. The agreements include a list of state departments, agencies, or specific individuals, known as “Trusted Partners,” who are authorized to use FEMA data on behalf of the state or organization. According to state and nonprofit officials, however, obtaining FEMA data has sometimes been challenging and time consuming. According to one nonprofit official, for example, FEMA sent data 6 weeks after the hurricane made landfall. State officials we interviewed in Florida said the process of requesting and receiving data was slow, and that the delayed access to the data limited state officials’ ability to assist individuals in a timely manner.

FEMA officials we interviewed said that the challenges nonfederal partners faced obtaining FEMA data on Individual Assistance

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<sup>37</sup>The Privacy Act of 1974, as amended, generally requires federal agencies to obtain individuals’ written consent before disclosing identifiable information about those individuals from a “system of records” maintained by the agency. See 5 U.S.C. § 552a(b). Under the act’s “routine use” exception, however, an agency is permitted to disclose such records when used for a purpose compatible with the purpose for which they were collected. Each agency that maintains a system of records is required to publish a notice, known as the System of Records Notice, in the *Federal Register*, describing the information the agency collects and each routine use, including the categories of users and the purposes of each use. FEMA’s most recent notice for its disaster assistance system of records lists a number of routine uses under which FEMA may disclose personally identifiable information to state, tribal, and local government agencies and emergency managers, including the type of information it can share and under what circumstances. See Privacy Act of 1974; Department of Homeland Security Federal Emergency Management Agency – 008 Disaster Recovery Assistance Files System of Records, 78 Fed. Reg. 25,282 (Apr. 30, 2013).

<sup>38</sup> A FEMA-State Agreement sets forth the understandings, commitments, and conditions for FEMA assistance in a state or territory and is generally a prerequisite to all forms of FEMA assistance. See 44 C.F.R. § 206.44. Under FEMA’s System of Records Notice, state agencies may request and receive information using the protocols established in an appropriate FEMA-state agreement, and they may also share information they receive from FEMA with their contractors/grantees, and/or agents that are administering a disaster related program on behalf of the agency under the same protocols. According to a FEMA policy document on data sharing, an Information Sharing Access Agreement is a “covenant between FEMA and non-FEMA parties that provides the terms and conditions of any information sharing.” See FEMA Recovery Policy 9420.1, *Secure Data Sharing* (Sept. 9, 2013). For example, FEMA officials said they regularly use Information Sharing Access Agreements to share data with the American Red Cross. According to FEMA policy, if the stated purpose for the requested FEMA data is inconsistent with those outlined in FEMA’s System of Records Notice, FEMA will reject the request.

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registrations are likely due to insufficient or unclear communication between FEMA and the states. For example, they said that joint field office leadership, who are responsible for developing the FEMA-State Agreements, may not have sufficient time to work with state and local officials to compile a comprehensive list of Trusted Partners. They explained that FEMA-State Agreements are developed quickly after a disaster declaration, when multiple priorities compete on short timelines and FEMA officials may not be aware of all the state- and local-level entities and individuals who need FEMA data to provide assistance. One FEMA official described situations in which state contractors requesting data should have had access to it but, according to the official, because they were not named in the agreement, FEMA would not allow sharing it. Further, FEMA officials suggested that while states may modify their FEMA-State Agreements to add to the list of Trusted Partners, state officials may not be aware of this option and, according to the officials, do so infrequently.

In addition, officials said that states may request FEMA data through an Information Sharing Access Agreement in lieu of modifying their FEMA-State Agreement, but FEMA does not provide guidance to partners on drafting or submitting these agreements. FEMA officials explained that FEMA program staff—rather than state officials—draft these agreements, so they did not see the need to issue guidance. However, officials added that these requests sometimes do not specify all the data elements FEMA needs, so staff has to work with the partners to refine the requests. Emergency management officials we interviewed in Florida reported that although nonprofit partners not named in the FEMA-State Agreement were denied their request for FEMA data, neither the state nor the nonprofit organizations requested data through Information Sharing Access Agreements, and the state did not request a modification of the FEMA-State Agreement.

FEMA officials described how ongoing agency efforts to improve overall processes could help address some of these data-sharing challenges. For example, officials reported that FEMA headquarters staff is developing tools to share with FEMA regional staff to help them standardize language in data-sharing agreements, which they said could expedite data sharing. They also told us that FEMA plans to issue a data management directive to FEMA staff to help ensure that internal and

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external stakeholders have the data they need and that the data are usable.<sup>39</sup>

Despite these efforts, FEMA has not made a concerted effort to educate nonfederal partners on FEMA's data sharing process, which could better facilitate Trusted Partners obtaining Individual Assistance data soon after disasters occur. FEMA officials said they could provide better instruction on the data sharing process on the agency website to help partners effectively request and work with FEMA to draft agreements, for example, by making available examples of approved agreements. Federal standards for internal control state that agency management should externally communicate the necessary information to achieve the entity's objectives. Without guidance from FEMA on how to effectively navigate its data-sharing process, nonfederal partners risk not receiving timely data. As a result, they may be hindered in their ability to contact and assist specific individuals, including people who are older or have disabilities, who need transportation, housing, disaster recovery, and other key types of assistance.

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<sup>39</sup>As of February 2019, FEMA officials said that the directive was expected to be released in March 2019.

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## Aspects of FEMA's Application Process for Assistance Created Challenges for Individuals Who Are Older or Have Disabilities

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### Some Individuals Who Are Older or Have Disabilities Experienced Long Wait Times and Other Challenges Registering for FEMA Assistance

Individuals who are older or have disabilities faced challenges registering for assistance under FEMA's IA program over the phone, online, and in-person following the 2017 hurricanes, based on our analysis of FEMA data, review of relevant reports, and interviews with FEMA officials and stakeholders.<sup>40</sup>

### FEMA Disaster Assistance Helpline

FEMA data indicate that individuals confronted long wait times when trying to apply for assistance through the agency's helpline, which may pose greater challenges for those who are older or have a disability.<sup>41</sup> FEMA has a performance goal for its call centers to answer helpline calls within 20 seconds. However, FEMA officials acknowledged this goal may be unattainable during times of high call volume. In the days after Hurricane Maria affected the territories—and survivors from Harvey and Irma were concurrently contacting the helpline—up to 69 percent of calls went unanswered and the daily average wait time for answered calls peaked at almost an hour and a half, according to our analysis of FEMA

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<sup>40</sup>As previously mentioned, individuals applying for IA register by answering a set of standard questions that help determine their eligibility. After answering these registration-intake questions, registrants typically must take additional steps to complete the application process for FEMA assistance. For example, FEMA typically conducts a home inspection to assess damaged property and may request that registrants submit additional documentation to verify eligibility, such as proof of ownership and insurance information.

<sup>41</sup>Individuals can call FEMA's helpline to complete their registration for FEMA assistance, ask questions about the application process, or check on the status of an existing application.

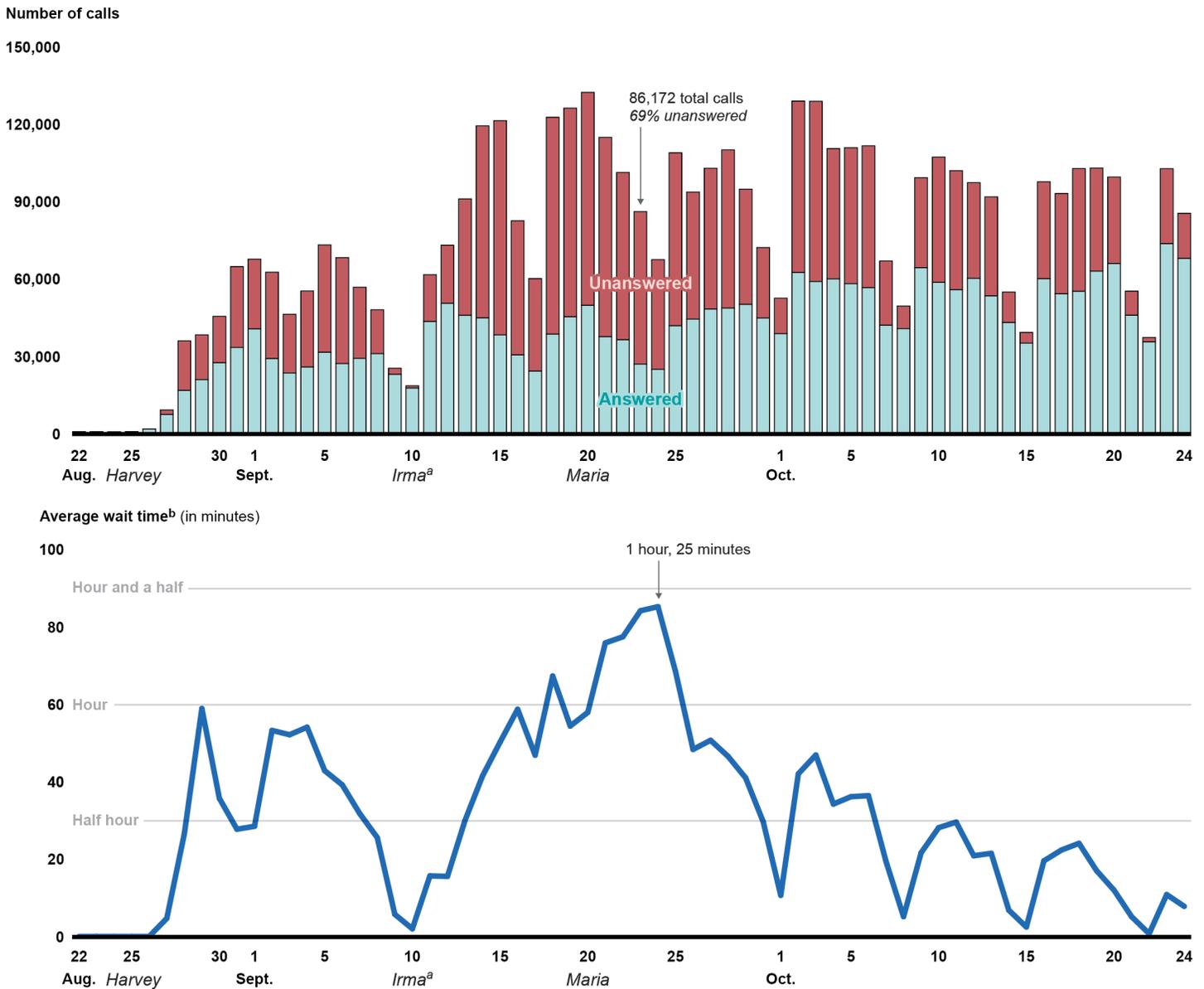
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data (see fig. 2).<sup>42</sup> The daily average wait time decreased following this peak and consistently remained under 30 minutes post-October 6, about 2 weeks after Hurricane Maria.

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<sup>42</sup>FEMA calculates the daily average of wait times for all answered calls. As a result, some callers may experience either shorter or longer wait times than the average. State officials, a disability rights organization's report, and a participant at a listening session hosted by CRCL and FEMA reported that some individuals waited on hold for over 6 hours before their call was answered by a FEMA helpline representative. According to FEMA, long wait times are associated with higher rates of unanswered calls because individuals either hang-up or the call is involuntarily disconnected—such as from a cell phone running out of batteries. FEMA does not track wait times for callers who hang up or are otherwise disconnected before reaching a call center representative.

**Figure 2: Volume of Calls and Average Daily Wait Times for the Federal Emergency Management Agency (FEMA) Disaster Assistance Helpline, August 22-October 24, 2017**



Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-19-318

<sup>a</sup>As a result of Hurricane Irma, major disasters were declared in the U.S Virgin Islands on September 7, 2017 and in Puerto Rico and Florida on September 10, 2017.

<sup>b</sup>Wait time represents the average time period before calls were answered each day. The Federal Emergency Management Agency (FEMA) does not track wait times for callers who hang up or are otherwise disconnected before reaching a call center representative. FEMA's count of unanswered

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and total calls excludes calls that were disconnected before 20 seconds elapsed. FEMA considers these voluntary disconnections that are not due to extended wait times.

While long wait times could be burdensome for all individuals, state officials and disability advocates we interviewed said long wait times were especially burdensome for people with certain disabilities, such as those with attention disorders or whose assistive technology prevents multi-tasking when waiting on hold. Individuals who rely on paid caregivers or interpreters to communicate also may have incurred additional costs as a result of the extra assistance they required while waiting on hold, according to a disability advocate. In addition, a Florida state official who works with older adults explained that many of these individuals may be on a fixed income and could not afford to wait on hold because their cell phone plans had limited minutes available each month.

FEMA officials told us that the number of calls to the helpline after the 2017 hurricanes was overwhelming and created an unprecedented need for additional staff to support the high call volume. As a result, FEMA officials told us they sought to reduce wait times by adding two fully staffed external call centers in September 2017 and maintaining the increased staffing to support the helpline during the 2018 hurricane season.

## Online and Mobile Application

Most individuals who are older or reported having disabilities ultimately registered online or through the mobile application (app); however, local officials and others reported that some of these individuals had difficulty using these methods.<sup>43</sup> Some individuals who are older or have disabilities do not have smart phones or internet access and others may not be computer literate or proficient in technology, according to FEMA, local, and nonprofit officials and participants of a listening session in Florida organized by the DHS Office for Civil Rights and Civil Liberties (CRCL) and FEMA. Further, the online application requests that registrants provide an email address, but some older adults do not have one or do not use one often, according to local officials. As a result, these individuals may not receive critical correspondence from FEMA. Also, FEMA's 2017 internal self-evaluation found the mobile app, which provides individuals with registration information, among other types of

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<sup>43</sup>Specifically, 84 percent of registrants who reported a disability to FEMA and 83 percent of registrants age 65 or over applied online or through the mobile application. Comparatively, 92 percent of registrants under age 65 applied online or through the mobile application.

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disaster-related information, was not compliant with Section 508 of the Rehabilitation Act.<sup>44</sup> In 2018, FEMA conducted a compliance test that found features of the mobile app remained inaccessible for people with blindness and low vision, according to FEMA officials.<sup>45</sup> Additionally, prolonged loss of power and lack of internet access and phone connectivity compounded challenges to registering with FEMA online and over the phone for all individuals, including those who are older or reported having disabilities. For example, in Puerto Rico, widespread damage from hurricane Maria left 3.7 million residents without electricity and 95 percent of cell towers out of service for a prolonged period of time.<sup>46</sup>

## Disaster Recovery Centers

Lack of transportation and long lines, among other issues, affected some individuals' ability to apply for FEMA assistance in person at Disaster Recovery Centers, according to FEMA officials, a disability rights organization report, and others. Some people with disabilities, particularly those in Puerto Rico and the U.S. Virgin Islands, reportedly could not travel to Disaster Recovery centers because they lacked conventional or accessible transportation or the roads were inaccessible, according to a disability rights organization's report.<sup>47</sup> Further, a participant in a CRCL

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<sup>44</sup>As previously discussed, section 508 of the Rehabilitation Act generally requires federal agencies to ensure that their electronic and information technology is accessible to individuals with disabilities, including employees and the public. 29 U.S.C. § 794d. FEMA completed its self-evaluation report in August 2017 after a six-month assessment to evaluate its facilities, programs, policies, and practices and determine how effectively the agency provides equal physical, program, and effective communication access to people with disabilities.

<sup>45</sup>FEMA officials said that in 2019 the agency plans to remediate the identified compliance issues and test improvements for the mobile application. Officials said a user experience group, including those who have access and functional needs or use assistive technologies, will inform the mobile application's design and development.

<sup>46</sup>According to local utilities, it took roughly 5 months for power to be restored to all the customers able to receive power safely in the U.S. Virgin Islands, and roughly 11 months for power to be restored to all customers able to receive power safely in Puerto Rico. The electric utility in the U.S. Virgin Islands serves approximately 55,000 customers and the electric utility in Puerto Rico serves approximately 1.5 million customers. Long-term infrastructure outages in Texas and Florida were isolated. According to FEMA, 10 days after Hurricane Harvey's landfall, 55,000 customers in Texas were without power, reduced from a peak of approximately 300,000 customers. In Florida, 75,000 customers were without power 10 days after Hurricane Irma made landfall, reduced from a peak of more than six million customers.

<sup>47</sup>The Partnership for Inclusive Disaster Strategies. *Getting It Wrong: An Indictment with a Blueprint for Getting It Right. Disability Rights, Obligations and Responsibilities Before, During and After Disasters* (May 2018).

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and FEMA listening session in Florida said the local Disaster Recovery Center was in an isolated location far from public transportation. Other individuals with disabilities who rely on power to operate life-sustaining equipment could not leave their homes to travel to the centers, according to the disability rights organization's report.

FEMA, state, and nonprofit officials also stated that individuals in some locations were required to wait in long lines to register for FEMA assistance, which was especially challenging for individuals who are older or have certain disabilities, such as those whose disability impacts their ability to stand. According to the disability rights organization's report, Disaster Recovery Centers in some locations did not have qualified on-site or remote sign language interpreters and did not always have print or electronic information in accessible formats for people with vision disabilities or low literacy. According to FEMA officials, some buildings—particularly in the U.S. Virgin Islands and Puerto Rico—used by FEMA to provide disaster assistance, including Disaster Recovery Centers, required substantial FEMA efforts to make them accessible. For example, they said that in the U.S. Virgin Islands FEMA had to make significant changes to improve accessibility at Disaster Recovery Centers, such as shipping ADA compliant toilets there, paving the parking lot to add accessible parking spots, and building an accessible ramp to the entrance of the building. Consistently opening accessible facilities remains an area for improvement for the agency, according to FEMA's internal self-evaluation. FEMA's mission requires swift action once a disaster occurs and the lack of available accessible facilities and competing priorities kept FEMA from consistently opening accessible facilities, according to the evaluation.

## Disaster Survivor Assistance Teams

Disaster Survivor Assistance Teams helped some individuals who are older or have disabilities access FEMA's registration process. According to FEMA officials, these teams primarily address the needs of people disproportionately affected by disasters, including individuals who are older or have disabilities. One of their tasks is helping individuals, including those who cannot otherwise register over the phone, online, or at a Disaster Recovery Center, register for FEMA assistance.<sup>48</sup> FEMA data show that 2 percent of all older adults who registered for FEMA assistance after the 2017 hurricanes did so with help from the Disaster

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<sup>48</sup>Disaster Survivor Assistance Teams are equipped with tablets and other mobile tools that allow them to register individuals at their home, shelter, or wherever they may be, according to FEMA.

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Survivors Assistance Teams, compared to 0.7 percent of applicants under the age of 65.<sup>49</sup> Some FEMA staff in the U.S. Virgin Islands consistently went into the field to locate and assist people who could not leave their homes, according to the disability rights organization's report. However, communication issues in Puerto Rico limited the teams' effectiveness. According to FEMA, limited cellular service required teams to use paper forms or offline tablets and laptops to register individuals, which they reported caused inaccuracies and omissions that may have delayed benefits. Further, assisting individuals this way is more resource-intensive for FEMA than other registration options.<sup>50</sup> Despite these challenges, Disaster Survivor Assistance Teams were helpful in registering individuals, particularly when they were accompanied by officials from local disability organizations, FEMA DIAs, and qualified sign language interpreters, according to the disability rights organization's report.

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<sup>49</sup>Similarly, 1.4 percent of all registrants with a reported disability who registered for FEMA assistance after the 2017 hurricanes did so with help from the Disaster Survivors Assistance Teams, compared to 0.9 percent of registrants with no reported disability.

<sup>50</sup>We previously reported that in the aftermath of Hurricane Maria, officials needed to conduct more door-to-door visits to reach disaster survivors and conduct assessments compared to the continental United States where individuals mostly apply for IA at Disaster Recovery Centers or online, according to FEMA officials. Locating addresses and individuals in Puerto Rico was challenging, according to FEMA officials, because many affected areas did not have posted addresses, many individuals use nicknames instead of their given names, and often several families were located on a single property. In addition, FEMA did not have enough bilingual employees to communicate with local residents or translate documents. According to FEMA officials, this resulted in further delays while staff were reshuffled from other disasters to Puerto Rico. [GAO-18-472](#).

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## FEMA Did Not Provide Individuals Clear Opportunities to Disclose Disability-Related Needs and Request Accommodations during the Application Process

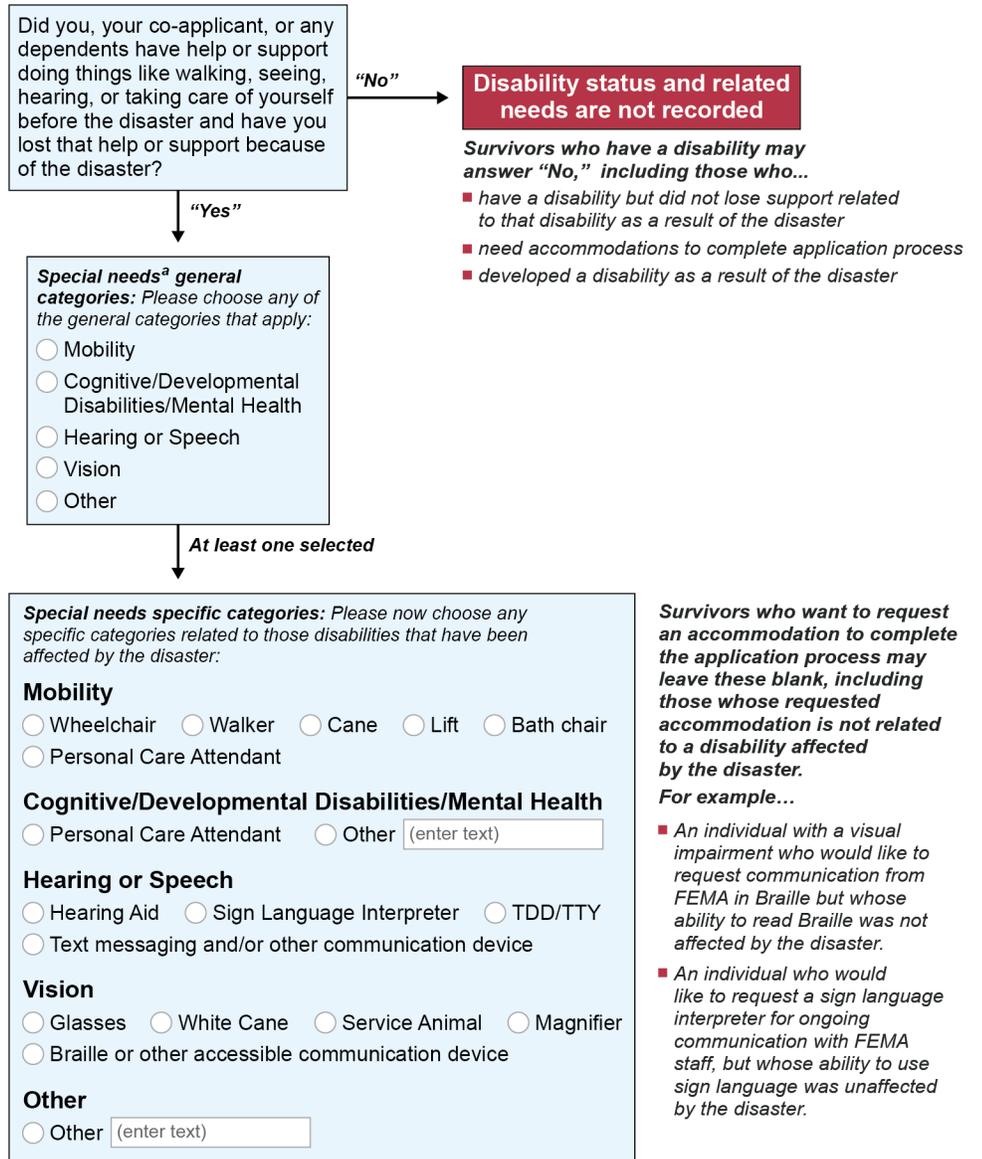
FEMA's registration process does not give individuals a clear opportunity to state they have a disability or request an accommodation. FEMA primarily collects information about individuals' disability-related needs from standard questions asked during the registration process.<sup>51</sup> FEMA also provides accommodations to individuals with a disability or access and functional need to ensure they can complete the registration and application process and participate fully in FEMA programs.<sup>52</sup> However, FEMA's registration does not include questions that directly ask registrants if they have a disability or if they would like to request an accommodation for completing FEMA's application process. See figure 3 for the sequence of questions FEMA uses to identify if someone needs assistance as a result of a disability.

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<sup>51</sup>For the purposes of this report, we use the term "disability-related needs" broadly to include all needs individuals may have that are related to a disability or access or functional need. For example, this may include replacement of a damaged wheelchair or other durable medical equipment, fixing an accessible ramp to a house, or any needed assistance to perform daily activities—such as showering, getting dressed, walking, and eating. Individuals with such needs may be eligible for FEMA assistance; for example, IHP provides financial assistance for disaster-related medical expenses, including repair or replacement of medical equipment. FEMA may also refer people with disability-related needs to other agencies or non-profits for assistance.

<sup>52</sup>According to a FEMA policy document, FEMA makes reasonable accommodations to policies, practices, and procedures to ensure physical, programmatic, and effective communication access to FEMA disaster assistance. This may include using technologies and services to ensure effective communication with applicants with disabilities and others with access and functional needs. For example, FEMA provides sign language interpreters and materials in alternate formats (such as Braille, large print and electronic formats) upon request. FEMA also has amplified telephones, phones that display text, and amplified listening devices for people with hearing loss. Some individuals with access and functional needs may be entitled to non-discrimination and other protections, including reasonable accommodations, under applicable civil rights laws. However, in this report we do not assess whether any accommodations or other services provided by FEMA or its partners during the period covered by our review complied with any such laws.

**Figure 3: Sequence of Disability-Related Questions in the Federal Emergency Management Agency (FEMA) Registration Process**



Source: GAO analysis of Federal Emergency Management Agency (FEMA) documentation. | GAO-19-318

<sup>a</sup>The term “special needs” no longer aligns with FEMA’s language standard for respecting the personal dignity of people with disabilities by using appropriate terminology, according to FEMA’s internal self-evaluation.

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FEMA officials stated that the disability-related questions are intended to determine if an individual has a disability and to identify disability-related needs, such as an accommodation to participate in the registration process. The information is intended to help FEMA staff match individuals with disabilities with appropriate resources in a timely and efficient manner and target additional assistance, such as individualized calls to help with the application process. According to FEMA, the questions are an acknowledgement that disability-related needs during a disaster can have life-saving implications and require additional attention. The information also informs policy and strategy for providing assistance to people with disabilities, according to a FEMA official.

However, the disability-related questions can be difficult to interpret, according to state and local officials and disability advocates. FEMA officials we interviewed and FEMA's internal self-evaluation also acknowledged the questions are unclear, consistently misinterpreted, and do not solicit accommodation requests or effectively collect information on an individual's disability and related needs. For example, while the questions ask registrants whether they have lost "help or support," FEMA's internal self-evaluation stated that the broadness of that phrase confuses registrants. Such language could be unclear for individuals with disabilities who live independently, as well as for individuals with disabilities that lost durable medical equipment but not access to a caregiver, according to FEMA. Additionally, individuals with disabilities who have not lost the help and support they need may answer "no." These registrants will not be counted or identified as people with disabilities, even though they may still require additional assistance from FEMA, such as a sign-language interpreter or other accommodations to complete the application process. Moreover, answering "no" also prevents registrants from being asked additional questions that collect more detailed information about the nature of their disability or disabilities. Even if registrants answer "yes," the additional registration questions ask specifically about needs related to disabilities that have been affected by the disaster, which may differ from disability-related needs they may have to complete the application process. For example, an individual with a visual impairment who needs communication from FEMA in Braille or large print may not check any of the categories under "vision" if their ability to read Braille or large print was not directly affected by the disaster.

As a result of the unclear questions, individuals with disabilities may not request accommodations or report having a disability and related needs during FEMA's registration-intake. FEMA's internal self-evaluation

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reported that the wording of the disability-related questions is confusing and registrants most often leave them unanswered or provide inaccurate information, resulting in delays in the assistance process. The self-evaluation also found that if a registrant indicates a disability-related need by answering “yes,” the registration process does not collect enough information to determine the nature of the need, such as whether it relates to a reasonable accommodation request or disaster assistance claim. As a result, the self-evaluation found that needs are not consistently matched to the appropriate FEMA disaster assistance program or service.

FEMA provided additional services to registrants who responded to the disability-related questions following the 2017 hurricanes; however, its ability to target these services may have been negatively affected due to the unclear disability-related questions. Further, the internal FEMA self-evaluation concluded that the disability-related registration-intake questions do not yield consistent and accurate information about the needs of individuals with disabilities. Federal internal control standards call for agencies to use accurate information to achieve their objectives.<sup>53</sup> The information collected in the registration process may under-identify people with disabilities. For example, Puerto Rico has the highest estimated percentage of people with disabilities compared to any state or territory, 21.6 percent, according to 2017 Census data. However, less than 3 percent of all registrants in the territory answered “yes” to the disability-related question in response to hurricanes Irma and Maria.<sup>54</sup>

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<sup>53</sup>[GAO-14-704G](#).

<sup>54</sup>This analysis does not assess compliance with any applicable non-discrimination or civil rights laws. The data are from the 2017 Puerto Rico Community Survey, a survey administered annually by the United States Census Bureau. The Puerto Rico Community Survey produces 1-year estimates for the total civilian noninstitutionalized population and is the equivalent of the American Community Survey for the 50 states and District of Columbia. Data results from both surveys are released together as a unified American Community Survey dataset. The estimate for Puerto Rico has a margin of error at the 90 percent confidence interval of plus or minus 0.5 percentage points.

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Other locations affected by the 2017 hurricanes had a similar pattern.<sup>55</sup> According to FEMA officials, while not all registrants with a disability have a related need, the large difference between Census disability data and FEMA’s identification of registrants with disability-related needs illustrates the extent of potential under-counting.<sup>56</sup>

To address this potential under-counting, FEMA’s disability integration staff spends a substantial percentage of their time trying to identify individuals with disabilities who may need additional assistance, according to a disability integration advisor. For example, FEMA staff created a list of approximately 100 key words that may indicate a disability and routinely search the notes field of case files to identify registrants that answered “no” or did not answer the disability-related questions but may have indicated the potential need for disability-related assistance.<sup>57</sup> In Puerto Rico, they identified an additional 94,000 cases of

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<sup>55</sup>Specifically, the estimated percentage of people with disabilities in Florida and Texas was 13.6 percent and 11.4 percent, respectively. However, 2.0 percent of registrants in Florida and 3.2 percent of registrants in Texas answered “yes” to the disability-related question. In the U.S. Virgin Islands, the estimated percentage of people with disabilities was 15.3 percent. However, 3.5 percent of all registrants in the territory answered “yes” to the disability-related question when applying for assistance after hurricanes Irma and Maria. The estimated percentage of people with disabilities for Texas and Florida was obtained from the 2017 American Community Survey, administered by the United States Census Bureau. Estimates from this source has margin of error at the 90 percent confidence intervals of plus or minus 0.5 percentage points or less. Data from the U.S. Virgin Islands was obtained from the 2010 decennial Census. All surveys asked about six disability types: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Respondents who report any one of the six disability types are considered to have a disability. Percentages reported by Census reflect the total civilian noninstitutionalized population for the entire state or territory. Percentages calculated using FEMA data reflect those who registered for FEMA’s IA program. This analysis does not assess compliance with any applicable non-discrimination or civil rights laws. Although not all who identify as having a disability for the Census survey have disability-related needs after disasters, the large difference between the two data sets illustrates potential under-counting in FEMA’s data. In Texas and Florida, a portion of the state was not declared eligible for IA, meaning that the percentage of individuals with disabilities in the affected areas may differ from the percentage of individuals with disabilities in the entire state.

<sup>56</sup>FEMA’s internal self-evaluation found similar disparities for a 2016 disaster when comparing the percentage of registrants that answered “yes” to the initial disability-related question to Census data on individuals reporting a disability in the disaster affected area. The evaluation concluded that while not every registrant with a disability is expected to answer “yes” to the disability-related question, the difference between the disability-related information collected during registration-intake and the Census is significant and should provide a basis for further investigation.

<sup>57</sup>In FEMA’s April 2019 comments on this draft report, one official stated that this procedure is not a standard practice and has been discouraged by ODIC leadership.

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individuals that may have a disability or related needs using this process, but said more individuals likely could have benefited from additional assistance from FEMA, according to FEMA officials. Disability integration officials also emphasized the importance of interacting with individuals in their communities to address challenges they had reporting disability-related needs during the registration process. These interactions resulted in FEMA identifying additional individuals with unreported disabilities and related needs. According to a local official, some older individuals may not have self-identified as having a disability even if they needed assistance, such as for low vision.

In addition to the registration questions and outreach efforts, such as searching registrants' case files, FEMA may identify disability-related needs in other ways, such as through conversations with survivors during the registration process and when individuals actively request accommodations. FEMA officials stated that while registration-intake specialists are partially responsible for identifying individuals' disabilities, registrants are also responsible for disclosing their disability-related needs. However, some individuals may not know that they can request an accommodation or the types of accommodations that are available, according to another FEMA official, and therefore may not request them without being informed of their options. A FEMA disability integration advisor we interviewed said other FEMA staff may not have had the expertise to ask targeted questions to identify a disability and needed accommodations. In addition, FEMA's internal self-evaluation reported that there is no clear process for an individual with a disability to request an accommodation throughout FEMA's delivery of disaster assistance under IHP and individuals may not be aware of the process for making an accommodation request.<sup>58</sup>

FEMA has made efforts to add clarity to the disability-related questions. In September 2017, FEMA posted a video on social media in American Sign Language encouraging individuals with disabilities or accommodation requests to answer "yes" to the initial disability-related question. In 2018, FEMA revised the supplemental instructions that accompany the disability-related question asked during registration to add clarification about the disability-related information FEMA hopes to identify, according

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<sup>58</sup>The self-evaluation also found that FEMA demonstrated a trend of placing the burden of accessibility on the individuals requesting an accommodation rather than proactively incorporating accessibility mechanisms into its programs and services.

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to FEMA officials.<sup>59</sup> FEMA established a work group to update the entire registration-intake questionnaire, and ODIC officials provided subject-matter expertise on the disability-related questions during the effort. According to FEMA officials, FEMA is in the process of revising all the registration-intake questions in coordination with the Office of Management and Budget (OMB).<sup>60</sup> Ongoing efforts to provide additional instructions may help some survivors. However, until revisions to the disability-related questions are made that improve the clarity of the questions, FEMA could continue to miss opportunities to collect and share information that could assist more individuals with disabilities, such as by directly soliciting accommodation requests.

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### Individuals May Have Faced Challenges Receiving Needed Assistance Because FEMA Did Not Effectively Communicate Disability-Related Needs across Its Assistance Programs

Individuals may have faced challenges receiving necessary assistance because FEMA did not effectively track and communicate information about individuals' disability-related needs across its assistance programs after such needs were identified. Federal internal control standards call for effective internal communication, but FEMA officials told us the agency's process made it difficult to ensure that information was available to all FEMA staff who might need it.<sup>61</sup> FEMA's internal self-evaluation found that FEMA does not have comprehensive policies or procedures for processing and administering accommodation requests. When such requests are made, according to the evaluation, FEMA typically provides a one-time accommodation, but the request does not "follow" an individual throughout their interactions with FEMA. FEMA officials we

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<sup>59</sup>The revised instructions read: "We are asking this question to see if you or anyone in your household had a disability that affected mobility, vision, hearing, understanding others, or taking care of yourself before the disaster. We would also like to know if the disaster caused you or anyone in your household to not be able to perform daily living activities. Examples of daily living activities include, but are not limited to, bathing or showering, getting dressed, getting in and out of bed or a chair, walking, using the toilet, and eating. By answering yes to this question, we will be able to add more information about your disability and figure out the best way to assist you or others in your household." FEMA provided training to Disaster Survivor Assistance staff focused on the new instructions, as well as tips for effectively assisting individuals with disabilities in answering the disability-related question.

<sup>60</sup>The Paperwork Reduction Act (PRA) provides that agencies may not conduct or sponsor the collection of information from 10 or more non-federal persons without first taking certain required steps, including allowing an opportunity for public comment and obtaining OMB approval, among other things. 44 U.S.C. § 3507. According to FEMA officials, FEMA cannot provide an estimate of when the process of updating the questions will be complete because it depends on OMB approval.

<sup>61</sup>[GAO-14-704G](#).

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interviewed explained that accommodation requests and disability-related information identified after registration-intake are recorded in a general “notes” section of a registrant’s case file, which may include other information not related to a registrant’s disability. Also, the electronic case file’s design does not include an alert or flag to indicate an accommodation request, according to FEMA officials.

As different officials may handle different stages of FEMA’s disaster assistance process, each official must read through the case file notes at various stages to see if accommodation requests or other disability-related needs were recorded. Officials acknowledged that disability-related needs recorded in the “notes” section can be easily overlooked as a case file is passed along to subsequent FEMA officials. An additional challenge is that FEMA’s electronic case file prevents staff from updating a registrant’s initial responses to the disability-related registration questions if a disability is identified or disclosed after the registration process. As a result, disability-related needs may not be communicated to FEMA staff who target outreach based in part on the answers to the registration-intake questions.

FEMA officials identified the home inspection as one area in the application process where challenges documenting and communicating information about a registrant’s disability could result in reported disability-related needs and requested accommodations being inadvertently overlooked.<sup>62</sup> They said that home inspectors would ideally be informed of the registrant’s disability-related needs or accommodation requests before the inspection. However, they explained that inspectors do not review registrants’ full files and may only discover an individual’s disability, such as a hearing or visual impairment, and any related accommodations the individual may need to participate in the inspection, when meeting with the individual for the first time at the inspection. Having an accommodation for an inspection could help individuals better answer the inspector’s questions and identify the scope of the damage to their home. FEMA officials stated that a long-standing practice for individuals with hearing and visual impairment has been to leverage the help of friends and family to communicate with the inspector. However, some people with disabilities may not have such support available.

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<sup>62</sup>FEMA home inspections are part of the process for verifying damage and loss for applicants for IHP assistance. Those who apply for FEMA assistance are typically contacted by a FEMA inspector or contractor to schedule an inspection.

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DHS policy requires equal opportunity for people with disabilities served by its programs as well as effective communication to individuals who are deaf or hard of hearing or are blind or have low vision. However, a FEMA official said that some FEMA inspectors continued with inspections even after they discovered that an individual did not have the accommodation they requested—such as a sign language interpreter. Inspectors, who are typically contractors, may have done so because they were paid based on the number of inspections they complete and re-scheduling may be perceived as burdensome, according to the official.<sup>63</sup> Even when accommodation requests for inspections were identified, a limited pool of available inspectors and a lack of qualified sign-language interpreters can exacerbate delays in the inspection process, according to DHS’s 2018 National Preparedness Report.<sup>64</sup>

Following the 2017 hurricanes, individuals who are older or have disabilities may have faced challenges with home inspections. Without information on a registrant’s disability-related needs and requested accommodations, some home inspectors were not able to proactively address these needs when scheduling an inspection. Individuals with disabilities faced challenges scheduling and travelling to inspections following the 2017 hurricanes, according to local and nonprofit officials and a disability rights organization’s report. Registrants who miss or cannot be contacted for an inspection may not be able to complete their application for FEMA assistance. FEMA requires inspectors to make a good faith effort to contact survivors.<sup>65</sup> However, people with disabilities, such as those who are deaf or hard of hearing, may not be able to respond to all forms of communication. A disability integration advisor described a case in which a FEMA team travelled to an elderly couple’s home because FEMA staff could not contact them over the phone. The

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<sup>63</sup>Another FEMA official reported in April 2019 that inspectors are no longer paid based on the number of inspections they complete.

<sup>64</sup>Department of Homeland Security, 2018 National Preparedness Report (Nov. 14, 2018). To meet the historically high needs for inspections in 2017, FEMA contracted additional inspectors to supplement existing inspections, according to the report. Still, FEMA experienced inspection staffing challenges that resulted in inspection backlogs across disaster affected areas. For example, due to inspection delays, on October 1, 2017, FEMA advised applicants in Texas that the inspection wait time may reach up to 45 days.

<sup>65</sup>According to the guidance FEMA provides to inspectors, to contact registrants, inspectors are required to try all available phone numbers, on different days, at different times of day, over a 3-day period. Further, inspectors are instructed to use e-mail or texting if possible. Inspectors must also post a “Sorry I Missed You” note at the home with their name and contact info.

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team learned that the couple could not hear the phone ring because they lost their hearing aids during the disaster. A disability integration advisor also stated that making information about individuals' accommodation needs readily available to FEMA staff could increase the success rate of contacting individuals with disabilities for services such as home inspections.

Challenges FEMA faced identifying and internally communicating disability-related needs, including the inspection-related challenges described above, may have contributed to some registrants not receiving FEMA's IHP assistance. For example, according to our analysis of FEMA data on registrations and awards for the 2017 hurricanes, 21 percent of registrants with reported disabilities who were denied assistance missed or could not be contacted for an inspection. For registrants with no reported disability whose application was denied, 19 percent missed or could not be contacted for an inspection.<sup>66</sup> In addition, FEMA staff stated that some individuals may not have received FEMA materials in accessible formats, such as large text for individuals with limited sight, and several nonprofit representatives in Florida reported that FEMA registration forms were not readily available in Braille. According to a FEMA Directive, alternate formats of disaster publications, such as documentation in Braille or large print, should not require special requests.<sup>67</sup> However, FEMA has not memorialized a process for obtaining these materials and requires individuals to request the alternate format each time they receive communication from FEMA, according to FEMA's internal self-evaluation.<sup>68</sup> Such challenges can prevent individuals with disabilities from receiving FEMA benefits and fully engaging in FEMA programs and services. See appendix II for information on outcomes of FEMA applications for IHP assistance by disability status.

FEMA officials we interviewed said that communication of disability-related needs across the agency could be improved by creating an alert or field in case files to easily identify individuals' disabilities or

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<sup>66</sup>This analysis does not assess compliance with any applicable non-discrimination or civil rights laws. In general, contacting individuals who have evacuated or who do not have electricity or cellular service can be challenging, according to a FEMA official.

<sup>67</sup>FEMA Directive 123-3, Printing, Duplicating and Copying (March, 2012).

<sup>68</sup>FEMA Directive 123-3, "Printing, Duplicating, and Copying" requires all disaster publications to be available with or without a request in Braille, large print, and electronic versions. However, FEMA has only one disaster publication available in Braille, according to FEMA's internal self-evaluation.

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accommodation requests. Such changes could also improve outcomes for this population, according to FEMA officials, and improve the agency's assistance to people with disabilities.

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## FEMA Has Taken Limited Steps to Effectively Implement Its New Disability Integration Approach

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### FEMA Began Implementing its New Approach to Disability Integration without Articulating Objectives

In June 2018, FEMA began implementing changes to its disability integration approach in an effort to integrate disability competencies throughout the agency and among its partners. Specifically, one region established a new position for disability integration staff—the DIA intended to work with state and local emergency management agencies—in June 2018 and FEMA DIAs were deployed under the new model starting that same month. However, in an April 2018 memorandum to Regional Administrators outlining the staffing proposal, FEMA had not established objectives for the new approach and, as of December 2018, continued to lack a clear articulation of desired outcomes for its inclusive emergency management practices.

Regarding FEMA's proposed change to add a new disability integration position to work directly with state or local emergency management agencies in each of the regions, ODIC officials told us that they provided a memorandum to all Regional Administrators outlining the proposal.<sup>69</sup> However, it does not include objectives for the new staffing approach. For example, the memorandum describes the role the new staff would play in building a culture of inclusive preparedness, including on accessibility-related evacuation, sheltering, and housing issues. However, it does not describe desired outcomes for FEMA's inclusive emergency management practices. ODIC officials acknowledged that Regional Administrators may interpret the new approach differently, and information provided by Regional Administrators shows that ODIC did not provide them with a set

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<sup>69</sup>ODIC officials said they first provided this memorandum to one Regional Administrator in April 2018 and later shared it with other Regional Administrators.

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of objectives. Regarding deployments as part of its new disability integration approach, FEMA reported distributing to agency staff a document containing basic information on the approach, but this document does not outline objectives that agency leadership could use to gauge success. For example, it explains that FEMA is exploring ways to incorporate disability integration training into all deployable positions, but does not describe a set of outcomes that, if met, could show the training is effective.

Federal standards for internal control state that management should define objectives in specific and measurable terms and internally communicate the necessary information to achieve an agency's objectives.<sup>70</sup> Without a set of common objectives for FEMA's new disability integration approach, FEMA risks inconsistent application of its inclusive emergency management approach across its regions.

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### FEMA Has Not Communicated Key Information to Help Regions Implement the New Disability Integration Staffing Approach

ODIC officials have taken limited steps to communicate FEMA's new disability integration staffing approach in the regions to Regional Administrators and Regional Disability Integration Specialists (RDIS), who are critical to implementing these changes.<sup>71</sup> An ODIC official said that ODIC leadership began communicating basic information to Regional Administrators on its new approach to disability integration staffing in the regions through conference calls, informal conversations, and a memorandum starting in the fall of 2017.

However, based on information Regional Administrators and RDIS reported to us in the fall of 2018, their awareness of FEMA's proposed changes varied (see fig. 4).<sup>72</sup> Further, most noted they had not received written implementation plans.

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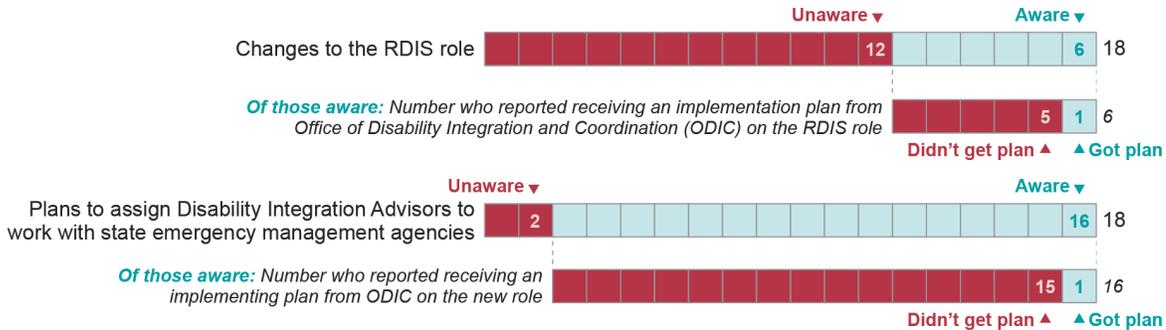
<sup>70</sup>[GAO-14-704G](#)

<sup>71</sup>As previously mentioned, Regional Disability Integration Specialists promote inclusive emergency management, support regional programmatic offices, and coordinate with state-assigned DIAs throughout FEMA's ten regions. Under the new staffing approach, FEMA proposed assigning new DIAs to each region to work with specific state or local emergency management agencies. In coordination with the RDIS, these DIAs would support state and local emergency managers by advising on inclusive emergency management principles and practices.

<sup>72</sup>We collected responses to a set of structured questions from all ten 10 FEMA Regional Administrators and eight RDIS in September 2018. Two of the 10 RDIS positions were vacant at the time we collected responses to our structured questions.

**Figure 4: Differences of Awareness of FEMA’s New Disability Integration Staffing Approach among All Regional Administrators and Regional Disability Integration Specialists (RDISs)**

Number of Regional Administrators and RDISs who stated they were aware or unaware of...



Source: GAO analysis of responses to structured questions from Federal Emergency Management Agency (FEMA) officials. | GAO-19-318

Note: We collected responses to a set of structured questions from all ten FEMA Regional Administrators and eight RDISs in September 2018. Two of the 10 RDIS positions were vacant at the time we collected responses to our structured questions.

Information Regional Administrators and RDISs reported to us in the fall of 2018 shows they lacked sufficient information from ODIC to better understand and consistently implement the new staffing approach nationwide. For instance, nearly all RDISs (seven of eight) reported not receiving information on their new responsibilities in working with DIAs assigned to work with state and local partners.<sup>73</sup> All 10 Regional Administrators reported that ODIC did not provide an implementation plan on the new DIA positions, and four said that improved communication from ODIC would be helpful to understand and implement the approach. While one RDIS reported receiving a description of revised responsibilities for DIA staff deployed to disaster locations, it did not address the new disability integration staffing approach in the regions. The memorandum that ODIC officials said they provided Regional Administrators on the new disability integration staff in the regions did not provide an implementation timeline or details, such as information on new staff roles and responsibilities, on what the new approach to disability integration should look like in the regions.

Further, ODIC has made changes to the new approach, acknowledging potential challenges with the plan to assign DIAs to each state. ODIC officials acknowledged that there may be differences in how the regions interpret the proposed changes to regional disability integration staff.

<sup>73</sup>Two of the 10 RDIS positions were vacant at the time we conducted outreach.

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However, ODIC officials said they have no plans to provide an implementation timeline or additional details on staff responsibilities to facilitate implementation, stating that Regional Administrators have discretion on how to operationalize the new approach and do not need ODIC guidance.

In addition, ODIC officials have not distributed written practices on effective disability integration that could guide regional management in evaluating the performance of new regionally-based disability integration staff. All 10 Regional Administrators reported that they have not received guidance from ODIC on how to evaluate the performance of the DIAs assigned to develop state partnerships. Regional Administrators also said they could use more information from ODIC, specifically on disability integration principles, which could help them evaluate staff performance by illustrating effective disability integration practices. ODIC officials reported that FEMA's human capital office is currently reviewing DIA position descriptions, but provided no estimate for when they would be available. ODIC officials reported verbally communicating their overarching philosophy on disability integration to Regional Administrators and RDIS, but said they have no plans to develop and distribute a written version. They explained that evaluating regional staff is the responsibility of the Regional Administrator, not ODIC.

Federal standards for internal control state that management should internally communicate the necessary information to achieve an agency's objectives.<sup>74</sup> It also states that management should design control activities that achieve objectives and respond to risks, and monitor and evaluate the results of those activities. Without a plan—including an implementation timeline and staff responsibilities—consistent with the objectives for the new approach to disability integration, FEMA risks inconsistent application of inclusive emergency management across its regions.

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<sup>74</sup>[GAO-14-704G](#).

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## FEMA Has Taken Some Steps to Train Deployed Staff but No Longer Offers Comprehensive Training to External Partners

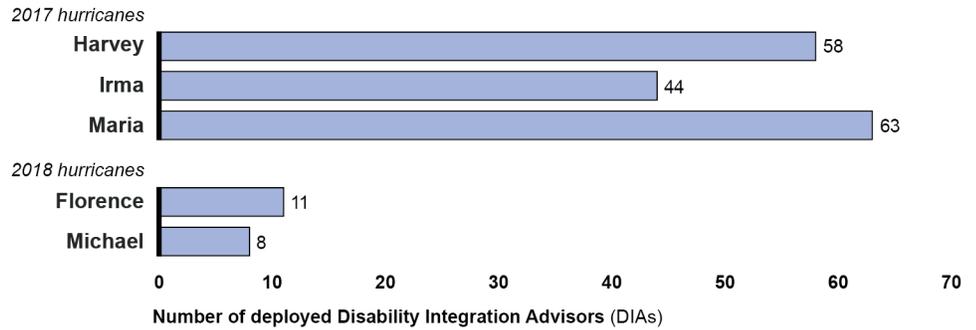
### Training FEMA staff

To implement the new deployment model during disasters declared in 2018, FEMA officials from ODIC took some steps to train agency staff on disability integration to help ensure inclusive emergency management practices and reduce the reliance on DIAs in the field.

- **Mandatory basic training on disability integration.** In March 2018, the FEMA Administrator directed all FEMA staff to complete a 30-minute training on basic disability integration principles, such as how to support individuals with disabilities while working in the joint field office. FEMA officials characterized the training as an initial step in integrating disability competencies throughout the agency.
- **“Just-in-time” training on disability integration.** According to FEMA officials, instructors delivered a range of training on disability integration in emergency management to agency staff deploying to disaster locations. For example, one of these trainings focused on communication and etiquette basics when interacting with individuals with disabilities. Another trained staff on how to ask individuals about their disabilities for the registration intake form.

After implementing its new disability integration staffing deployment model in June 2018, FEMA reduced the number of DIAs deployed to disaster locations (see fig. 6).

**Figure 5: Peak Number of Deployed FEMA Disability Integration Advisors in 2017 and 2018 Hurricane Locations**



Source: GAO analysis of Federal Emergency Management Agency (FEMA) DIA deployment data. | GAO-19-318

Note: This data reflects the peak number of deployed DIAs to select disaster locations in 2017 and 2018. FEMA shifted DIAs among those locations, depending on demands, during response and recovery efforts. In 2017, DIAs directly assisted hurricane survivors with disabilities in Texas, Florida, Puerto Rico, and the U.S. Virgin Islands. In 2018, under a new model, DIAs advised FEMA field leadership in North Carolina, South Carolina, Georgia, and Florida on disability integration practices.

As part of the shift in responsibilities, FEMA officials reported that DIAs deployed to 2018 disasters provided none of the disability integration training to other FEMA staff.<sup>75</sup> According to FEMA officials, these trainings instead were delivered by FEMA training staff on an as-needed basis. While officials told us in November 2018 that they planned to evaluate the trainings through surveys, they had not yet done so as of December 2018.

Although FEMA officials emphasized the need to integrate disability competencies throughout its programmatic offices and deployable staff, they do not have written plans—including milestones, performance measures, or a plan for monitoring performance—for developing new comprehensive training for all staff beyond the basic and just-in-time training currently available. In July 2018, FEMA hired a new Program and Policy Branch Chief for ODIC who, according to ODIC officials, will review, assess, and recommend ways to incorporate disability competencies into training for all FEMA staff. ODIC officials said that program and field staff will help identify training gaps to inform the chief's

<sup>75</sup>Under the new model, DIAs are responsible for advising field leadership and program staff on inclusive emergency management practices, and other deployed FEMA staff are responsible for directly assisting individuals with disabilities. According to ODIC officials, this responsibility has always existed for all FEMA staff, but DIAs have increasingly taken over more of the responsibility since 2010 when ODIC was created.

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recommendations.<sup>76</sup> However, officials reported no timeline for making these recommendations. According to one official, FEMA will develop new training as needed. The former FEMA Administrator, under whom ODIC was created, noted that significant investment would be required to fully integrate disability competencies throughout the agency. He explained that it will take time for FEMA to comprehensively train staff on disability competencies and that DIAs are necessary for filling in gaps in the meantime. Current FEMA officials also acknowledged that more training will be needed to accomplish their goals related to inclusive emergency management. However, they noted that building a disability integration curriculum will take time and funding, explaining that FEMA's training unit may have competing priorities and the agency's 2019 and future budgets are unknown.

FEMA's August 2017 internal self-evaluation reported that its staff generally lacked adequate disability-related training and education. During interviews in all four disaster sites, officials and others we interviewed, including local officials, disability advocates, and survivors, reported that FEMA staff did not always effectively communicate with and assist individuals who are older or have disabilities in completing the online registration-intake form. Federal standards for internal control state that management should identify, analyze, and respond to significant changes that could impact the internal control system.<sup>77</sup> Additionally, leading practices identified in the Program Management Institute's The Standard for Program Management call for agencies to develop meaningful measures to monitor program performance and to track the accomplishment of the program's goals and objectives.<sup>78</sup> We have previously recommended that FEMA establish and use goals, milestones, and performance measures to monitor program performance designed to help FEMA staff determine their readiness to respond to disasters.<sup>79</sup> FEMA's Strategic Plan 2018-2022 states that FEMA will develop targeted

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<sup>76</sup>ODIC officials said that they are also developing a strategic plan that will address state and local capacity building.

<sup>77</sup>[GAO-14-704G](#).

<sup>78</sup>Project Management Institute, Inc., The Standard for Program Management®, Third Edition (Newton Square, PA: 2013). The Standard for Program Management® describes, among other things, how resource planning; goals, milestones, and performance measures; and program monitoring and reporting are good practices that can enhance management for most programs.

<sup>79</sup>[GAO-15-781](#).

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solutions to close identified competency gaps. Developing a plan for delivering disability integration training to all FEMA staff that includes milestones and performance measures, and outlines how performance will be monitored, would better position FEMA to provide training to all staff that achieves its intended goals. As a result of such training, deployed staff will be better equipped to identify and assist individuals who are older or have disabilities.

### Training for nonfederal partners

The smaller number of DIAs deployed, as well as their shift away from providing direct assistance to individuals with disabilities, may result in nonfederal partners, such as state, territorial, and local emergency managers, providing more direct assistance to these individuals than they did previously. However, according to officials, FEMA stopped offering its comprehensive introductory course, “Integrating Access and Functional Needs into Emergency Planning,” on disability integration to its nonfederal partners in September 2017. We previously reported that this 2-day training included substantial information on incorporating the needs of people with disabilities in emergency planning.<sup>80</sup> For example, the training included a module for emergency managers on the importance of preparing shelters with equipment to accommodate individuals with disabilities. We also reported that the demand for the training exceeded FEMA’s delivery capacity.<sup>81</sup> However, ODIC officials determined that the course did not provide actionable training to emergency management partners and other stakeholders to meet the needs of individuals with disabilities.<sup>82</sup> FEMA officials said they have plans to replace the course with new training, which is currently under development, but provided no timeline for doing so.

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<sup>80</sup>[GAO-17-200](#).

<sup>81</sup>To address this challenge, we recommended that FEMA establish written procedures for involving ODIC in regional activities; set goals for disseminating disability integration training; and evaluate alternative delivery methods for the training. FEMA agreed with the recommendations, and has efforts underway to address them. See [GAO-17-200](#).

<sup>82</sup>According to FEMA officials, staff in some FEMA regions have initiated advisory groups as a way to train and engage disability partners and local emergency managers. FEMA officials said that RDISs in six regions facilitate relationships between local emergency management agencies and disability stakeholders using advisory groups. FEMA has used advisory groups to help jurisdictions build inclusive emergency management practices through collaboration and partnership between disability stakeholders and emergency managers.

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During interviews in Florida, Texas, Puerto Rico, and the U.S. Virgin Islands, officials from four disability organizations told us that state and local emergency managers could use additional disability-related training. Specifically, these stakeholders said that individuals with disabilities reported experiences where emergency managers were insensitive to their needs and disability-related accommodation requests. For example, disability advocates and survivors in Florida, Puerto Rico, Texas, and the U.S. Virgin Islands described shelter-related accessibility challenges, including access to bathrooms. In addition, three deployed DIAs we interviewed in Florida and Puerto Rico reported that local emergency managers have requested structured training on disability integration practices to better prepare their communities.

Federal standards for internal control state that management should externally communicate the necessary quality information to effectively implement the agency's objectives and, under the Post-Katrina Act, one of the Disability Coordinator's responsibilities is ensuring the development of training materials for emergency managers.<sup>83</sup> A timeline for completing the development of new training for state and local emergency managers would help ensure such training is offered and partners are provided with timely information on inclusive emergency management practices.

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## Conclusions

The unprecedented 2017 hurricane season tested emergency managers' capacity for responding to the sometimes complex needs of individuals who are older or have disabilities in Florida, Puerto Rico, Texas, and the U.S. Virgin Islands. Some challenges—such as debilitated transportation infrastructure in the U.S. Virgin Islands and Puerto Rico—proved overwhelming for local and state officials. FEMA tried to mitigate these challenges with its disability integration staff, who aimed to ensure that individuals with disabilities received appropriate assistance.

Nevertheless, the difficulties individuals experienced in attempting to register for FEMA assistance, as well as local and nonprofit partners' difficulties gaining access to registration information, may have limited the assistance older individuals and those with disabilities received. Confusion about the registration questions and the lack of communication across FEMA programs may have led to FEMA overlooking individuals with disability-related assistance needs. As a result, FEMA and its

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<sup>83</sup>[GAO-14-704G](#); 6 U.S.C. § 321b(b)(5).

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partners may have missed opportunities to collect and share information that would have allowed them to better assist individuals who are older or have disabilities.

FEMA's new approach to decentralize and distribute responsibilities across the agency for providing disaster assistance to individuals who have disabilities was not broadly, clearly, or consistently articulated. FEMA may not be able to effectively implement its new disability integration approach without objectives or a plan that includes a timeline and staff responsibilities. These elements are critical for ensuring that all FEMA staff are consistently delivering appropriate services to disaster survivors with disability-related needs. These changes are also being implemented before staff have been fully trained. Without a plan for delivering training on disability integration to FEMA staff that includes milestones and performance measures, and that outlines how performance should be monitored, the agency may be ill-prepared to identify and address challenges individuals who have disabilities, including those who are older, face recovering from disaster. Furthermore, without a timeline for completing the training FEMA has begun developing for state and local emergency management partners on inclusive emergency management practices, there is a risk partners will not have timely access to information that would benefit individuals most vulnerable to the effects of disasters.

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## Recommendations for Executive Action

We are making the following seven recommendations to the FEMA Administrator:

- The FEMA Administrator should develop and publicize guidance for partners working to assist individuals who are older or have disabilities for requesting data and working with FEMA staff throughout the data sharing process to obtain Individual Assistance data, as appropriate. (Recommendation 1)
- The FEMA Administrator should implement new registration-intake questions that improve FEMA's ability to identify and address survivors' disability-related needs by, for example, directly soliciting survivors' accommodation requests. (Recommendation 2)
- The FEMA Administrator should improve communication of registrants' disability-related information across FEMA programs, such as by developing an alert within survivor files that indicates an accommodation request. (Recommendation 3)

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- The FEMA Administrator should establish and disseminate a set of objectives for FEMA’s new disability integration approach. (Recommendation 4)
  - The FEMA Administrator should communicate to Regional Administrators and Regional Disability Integration Specialists a written plan for implementing its new disability integration staffing approach, consistent with the objectives established for disability integration. Such a plan should include an implementation timeline and details on staff responsibilities, which regions could use to evaluate staff performance. (Recommendation 5)
  - The FEMA Administrator should develop a plan for delivering training to FEMA staff that promotes competency in disability awareness. The plan should include milestones and performance measures, and outline how performance will be monitored. (Recommendation 6)
  - The FEMA Administrator should develop a timeline for completing the development of new disability-related training the agency can offer to its partners that incorporates the needs of individuals with disabilities into disaster preparedness, response, and recovery operations. (Recommendation 7)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided written comments, which are reproduced in appendix III and described below, and concurred with recommendations 1, 2, and 4-7. The comment letter generally described steps FEMA plans to take, or is in the process of taking, to address all recommendations. As discussed further below, DHS did not concur with recommendation 3 and, for recommendation 6, described plans to improve disability competencies among FEMA staff that does not include training. DHS also provided technical comments, which we incorporated as appropriate.

DHS did not concur with recommendation 3 to improve communication of registrants’ disability-related information across FEMA programs. Specifically, DHS noted that FEMA lacks specific funding to augment the legacy data systems that capture and communicate registration information. DHS further noted that FEMA began a long-term initiative in April 2017 to improve data management and exchange, and improve overall data quality and standardization. FEMA expects the initiative to include the development of a modern, cloud-based data storage system with a data analytics platform that will allow analysts, decision makers, and stakeholders more ready access to FEMA data. After the completion

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of this initiative, FEMA expects that efforts to share and flag specific disability-related data will be much easier.

We acknowledge FEMA's concerns about using resources to change legacy systems when it has existing plans to replace those systems. However, the recommendation was not solely focused on system changes, although that is an example of a way to help improve communication. There are other cost-effective ways that are likely to improve communication of registrants' disability-related information prior to implementing the system upgrades. For example, as noted in the report, FEMA officials handling different stages of the disaster assistance process may overlook disability-related needs recorded in the case file notes. FEMA could revise its guidance to remind program officials to review the notes to identify whether there is a record of any such needs. As FEMA moves ahead with its data improvement initiatives, we encourage it to consider and ultimately implement technology changes, such as developing an alert within files that indicates an accommodation request. Such improvements would be consistent with the recommendation and help improve communication across FEMA programs.

With respect to recommendation 6 related to training FEMA staff on disability competencies, DHS concurred. The letter stated that FEMA's ODIC is developing a plan to include a disability integration competency in the position task books for all deployable staff, rather than through training. Position task books outline the required activities, tasks, and behaviors for each job, and serve as a record for task completion. The plan will also include:

- a communications and outreach plan;
- milestones for measuring the effectiveness of the integration of this competency across the agency; and
- a monitoring plan and milestones to measure the overall integration of this competency across the deployable workforce.

We continue to believe that FEMA should develop a plan that includes how it will deliver training to promote competency in disability awareness among its staff. The plan for delivering such training should include milestones, performance measures, and how performance will be monitored.

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As agreed with your offices, unless you publicly announce its contents earlier, we plan no further distribution until 30 days from its issue date. At that time, we will send copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, and other interested parties. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Elizabeth Curda  
Director  
Education, Workforce, and Income Security Issues

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*List of Requesters*

The Honorable Michael Enzi  
Chairman  
Committee on the Budget  
United States Senate

The Honorable Ron Johnson  
Chairman  
The Honorable Gary C. Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Marco Rubio  
Chairman  
Committee on Small Business and Entrepreneurship  
United States Senate

The Honorable Susan Collins  
Chairman  
The Honorable Robert Casey  
Ranking Member  
Special Committee on Aging  
United States Senate

The Honorable Rand Paul, M.D.  
Chairman  
Subcommittee on Federal Spending, Oversight and Emergency  
Management  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Maxine Waters  
Chairwoman  
Committee on Financial Services  
House of Representatives

The Honorable Bennie Thompson  
Chairman  
Committee on Homeland Security  
House of Representatives

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The Honorable Elijah Cummings  
Chairman  
The Honorable Jim Jordan  
Ranking Member  
Committee on Oversight and Reform  
House of Representatives

The Honorable Nydia Velázquez  
Chairwoman  
Committee on Small Business  
House of Representatives

The Honorable Peter DeFazio  
Chairman  
The Honorable Samuel “Sam” Graves  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The Honorable Al Green  
Chairman  
Subcommittee on Oversight and Investigations  
Committee on Financial Services  
House of Representatives

The Honorable Sean Duffy  
Ranking Member  
Subcommittee on Housing, Community Development, and Insurance  
Committee on Financial Services  
House of Representatives

The Honorable Emanuel Cleaver, II  
House of Representatives

The Honorable Michael McCaul  
House of Representatives

The Honorable Gary Palmer  
House of Representatives

The Honorable Ann Wagner  
House of Representatives

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# Appendix I: Objectives, Scope, and Methodology

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This appendix discusses in detail our methodology for examining 1) challenges Federal Emergency Management Agency (FEMA) partners reported in providing disaster assistance to individuals who are older or have disabilities; 2) challenges faced by such individuals in accessing FEMA's disaster assistance programs, and actions FEMA has taken to address such challenges; and 3) the extent to which FEMA has planned for and taken steps to implement its new approach to disability integration. The focus of this report is on the three near-sequential hurricanes—Hurricanes Harvey, Irma, and Maria—that made landfall in 2017 in primarily four geographic areas—Florida, Puerto Rico, Texas, and the U.S. Virgin Islands.<sup>1</sup>

Primarily to address our first objective, we visited Florida, Puerto Rico, Texas, and the U.S. Virgin Islands in June and July 2018. At each location we interviewed state or territory emergency managers, public health and human services officials, and representatives of nonprofit disability organizations. For example, we interviewed representatives of Centers for Independent Living in all four locations and organizations that advocate for the civil rights of people with disabilities in Texas and Florida. We also interviewed local emergency managers in Texas and Florida in counties that were affected by Hurricanes Harvey and Irma. To learn first-hand accounts of disaster-related challenges faced by individuals in Puerto Rico and the U.S. Virgin Islands who are older or have disabilities, staff from the Centers for Independent Living in those locations invited us to interview a collective total of 16 of their regular program participants.

We also interviewed representatives of national organizations, selected for their focus on providing assistance to disaster survivors who are older or have disabilities, including AARP, The Partnership for Inclusive Disaster Strategies—a coalition focused on inclusive disaster planning and emergency preparedness for people with disabilities—and Portlight Inclusive Disaster Strategies, Inc. In addition, we interviewed officials from other relevant federal agencies and offices, including the Department of Homeland Security's (DHS) Office for Civil Rights and Civil Liberties (CRCL) and the National Council on Disability. To supplement information we obtained from interviews, we reviewed summaries of eight public listening sessions published by CRCL and co-hosted with FEMA

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<sup>1</sup>We also spoke with FEMA officials and disability advocates and collected limited data on FEMA's response to hurricane Florence and Hurricane Michael that made landfall in 2018 in North Carolina and Florida.

across the four disaster locations between February 2018 and May 2018. The purpose of these sessions, according to CRCL, was to hear about concerns and experiences related to the impact of the disasters on individuals with disabilities. While the perspectives of officials and stakeholders we interviewed, as well as those expressed during the public listening sessions, are not generalizable, they provide valuable insights into the federal response to the 2017 disasters.

To address our second objective, we obtained and analyzed summary data from FEMA's National Emergency Management Information System (NEMIS)—a database used to track disaster data—on FEMA registrations and awards for disaster assistance for the hurricanes included in our review. FEMA also provided data for registrations submitted by households with residents who are older and households with residents who reported disabilities. Registrations were included in the category of older survivor if the applicant or co-applicant was aged 65 or older. Registrations were included in the disability category if the applicant answered “yes” to the to the registration-intake question: “Did you, your co-applicant, or any dependents have help or support doing things like walking, seeing, hearing, or taking care of yourself before the disaster and have you lost that help or support because of the disaster?” These data reflect the status of FEMA registrations as of October 18, 2018.

We also obtained and analyzed summary data from FEMA's internal and external call centers that operate its helpline, including the number of calls that were answered and the average wait times for answered calls for a given day.<sup>2</sup> We focused on the busiest period of incoming calls for the call centers following the 2017 hurricanes—August 2017 to October 2017. To assess the reliability of FEMA's summary data, we interviewed officials at FEMA headquarters about the quality of the data; reviewed existing information about the data systems; and conducted checks for out of range or logically inaccurate data and comparisons to publicly available summary data. The demographic data in NEMIS, such as disability-related information, are largely self-reported by applicants, and FEMA does not independently verify all of the data it collects. Further, as our report identifies, the number of individuals who answer yes to the disability-related question on FEMA's registration form may not be a reliable estimate for the number of individuals who have a disability. We

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<sup>2</sup>Individuals can call FEMA's helpline to complete their registration for FEMA assistance, ask questions about the application process, or check on the status of an existing application.

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determined that the data were sufficiently reliable for the purpose of providing information on the number and characteristics of registrations for assistance FEMA collects and the number of calls to FEMA's call centers.

To address our third objective, we compared staffing levels before and after FEMA implemented its new disability integration approach by obtaining and analyzing the number of deployed disability integration officials in response to the 2017 hurricanes, and the 2018 Hurricanes Florence and Michael. To assess the reliability of these data we reviewed recent GAO work that assessed the reliability of FEMA's workforce data from the same data source and reviewed the data for obvious errors and omissions.<sup>3</sup> We determined that the data were sufficiently reliable to provide information on the deployed FEMA workforce in response to recent hurricanes. To further assess FEMA's planning and implementation of its new approach to disability integration, we obtained and analyzed responses to structured questions from officials in FEMA's ten regions.

To address all three objectives, we reviewed relevant federal laws and regulations; relevant agency documents; and reports by federal agencies and nongovernmental organizations. We analyzed FEMA policies, procedures, guidance, and memoranda specific to FEMA's Individuals and Households Program and disability integration, including FEMA's plan to implement its new approach to disability integration and its data sharing policy. We assessed FEMA's actions against goals and objectives in FEMA's 2018-2022 Strategic Plan; DHS policy for ensuring nondiscrimination for individuals with disabilities; and federal standards for internal control related to effective internal and external communication, using quality information to achieve objectives, and defining objectives in measurable terms. We reviewed federal disaster-related frameworks and reports, including the National Response Framework, the 2018 National Preparedness Report, the 2017 Hurricane Season FEMA After-Action Report. We also reviewed FEMA's unpublished self-evaluation of its policies and practices, which sought to determine how effectively FEMA provides equal physical, program, and

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<sup>3</sup>[GAO-18-472](#)

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communication access to people with disabilities.<sup>4</sup> We also reviewed relevant information from our prior reports on FEMA's work,<sup>5</sup> as well as an after-action report from The Partnership for Inclusive Disaster Strategies—a disability rights organization.<sup>6</sup> We did not independently assess whether any programs or activities conducted by FEMA or its partners during the period covered by our review complied with applicable non-discrimination or civil rights laws.

To address all three objectives, we also interviewed FEMA officials to discuss FEMA's process for sharing disaster assistance data, challenges individuals may have faced accessing FEMA's disaster assistance programs, and FEMA's new approach to disability integration. We interviewed staff from FEMA headquarters, including officials from the Office of Disability Integration and Coordination, Office of External Affairs, and officials who administer the Individual Assistance Program. We also met with FEMA staff focused on assisting individuals with disabilities and deployed to each disaster location, including staff from the FEMA regional offices where each disaster occurred. Finally, we interviewed former FEMA officials, including a previous FEMA Administrator.

We conducted this performance audit from April 2018 to May 2019, in accordance with generally accepted government auditing standards.

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<sup>4</sup>In 2013, the Department of Homeland Security (DHS) issued Directive 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment), which included a requirement for DHS components—including FEMA—to (1) conduct a self-evaluation of their programs and activities to identify any barriers to access and gaps in existing component policies or procedures for providing reasonable accommodations; and (2) develop a plan that addresses any identified barriers and documents the components' disability policies. FEMA completed its self-evaluation in August 2017 and plans to issue a plan for addressing issues identified in the self-assessment in 2019. GAO received the self-evaluation and a draft implementation plan in December 2018, after our site visits and the majority of our audit work was completed.

<sup>5</sup>GAO, *2017 Hurricanes and Wildfires: Initial Observations on the Federal Response and Key Recovery Challenges*, [GAO-18-472](#), (Washington, D.C.: Sept. 4, 2018) and GAO, *Federal Disaster Assistance: FEMA's Progress in Aiding Individuals with Disabilities Could Be Further Enhanced*, [GAO-17-200](#) (Washington, D.C.: Feb. 7, 2017).

<sup>6</sup>This report incorporated the perspectives of stakeholders who were working in disaster-impacted communities and thousands of callers to a hotline established by The Partnership for Inclusive Disaster Strategies to address the needs of survivors of the 2017 hurricanes. The organization's CEO is a former director of FEMA's Office of Disability Integration and Coordination. The Partnership for Inclusive Disaster Strategies, *Getting It Wrong: An Indictment with a Blueprint for Getting It Right. Disability Rights, Obligations and Responsibilities Before, During and After Disasters* (May 2018).

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Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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# Appendix II: Outcomes of Applications for Federal Emergency Management Agency (FEMA) Financial Assistance for 2017 Hurricanes by Disability Status

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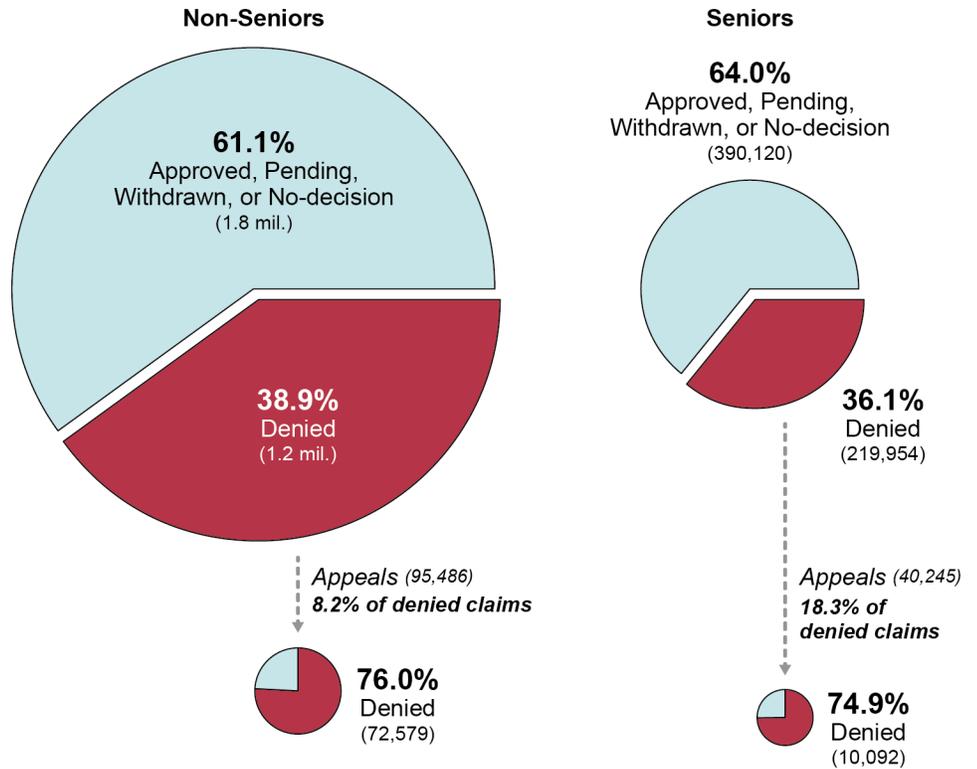
According to our analysis of FEMA data, registrants who reported a disability during registration-intake had a higher percentage of denial for FEMA IHP assistance, a lower percentage of submitting an appeal, and a higher percentage of denial on appeal compared to registrants who did not report a disability (see fig. 6).<sup>1</sup> Individuals with disabilities have unique challenges, according to FEMA officials. These challenges may result in increased rates of denial for disaster assistance. For example, people with disabilities, particularly those with complex medical needs, may require extensive documentation to prove losses and obtaining medical records may be challenging after a storm.

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<sup>1</sup>Our analysis did not assess compliance with any applicable non-discrimination or civil rights laws. Registrants 65 and older had a lower percentage of denials for FEMA assistance, a higher percentage of submitting an appeal, and a lower percentage of denial for appeal compared to registrants who were under 65. Specifically, 36.1 percent of registrants 65 and older (219,954) were initially denied assistance; 18.3% of those denials (40,245) were appealed; and 74.9 percent of those appeals (30,153) were denied. In comparison, 38.9 percent of registrants under 65 (1.2 million) were initially denied assistance; 8.2 percent of those denials (95,486) were appealed; and 76.0 percent of those appeals (72,579) were denied.

**Appendix II: Outcomes of Applications for Federal Emergency Management Agency (FEMA) Financial Assistance for 2017 Hurricanes by Disability Status**

**Figure 6: Number of Denied Applications and Appeals for Federal Emergency Management Agency (FEMA) Financial Assistance for 2017 Hurricanes by Disability Status, as of October 18, 2018**



Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-19-318

Note: The data include registrations that were referred for Federal Emergency Management Agency's (FEMA) Individuals and Households Program in Florida, Puerto Rico, Texas, and the U.S. Virgin Islands as a result of Hurricane Harvey, Irma, and Maria in 2017. Some registrations, such as those indicating no damage, are not referred for assistance, according to FEMA. The "reported disability" population includes individuals who answered 'yes' to the registration-intake question: "Did you, your co-applicant, or any dependents have help or support doing things like walking, seeing, hearing, or taking care of yourself before the disaster and have you lost that help or support because of the disaster?" This analysis does not assess compliance with any applicable non-discrimination or civil rights laws.

# Appendix III: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

April 18, 2019

Elizabeth Curda, Director  
Education, Workforce, Income Security  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-19-318, "DISASTER ASSISTANCE: FEMA Action Needed to Better Support Individuals Who Are Older or Have Disabilities"

Dear Ms. Curda:

Thank you for the opportunity to review and comment on the subject draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's recognition of the unprecedented nature of the 2017 hurricane season and Federal Emergency Management Agency (FEMA) efforts to mitigate challenges associated with responding to the sometimes complex needs of individuals who are older or have disabilities. This included efforts to implement an enterprise level approach to disability integration and the Agency's strategy to incorporate a disability integration competency across all FEMA programs.

More specifically, following hurricanes Harvey, Irma, and Maria and the wildfires in California, the DHS Office for Civil Rights and Civil Liberties (CRCL) and FEMA Office of Equal Rights (OER) took a variety of steps to ensure that FEMA as well as state, local, and territorial agencies that receive federal assistance comply with civil rights laws, including Section 504 of the Rehabilitation Act of 1973, in disaster preparedness, response, and recovery programs and activities.

For example, together with the U.S. Department of Justice Civil Rights Division, these offices reminded state and local emergency management agencies of their civil rights responsibilities in a letter dated October 4, 2018. The letter offers technical assistance, outreach, and training to help state and local emergency management agencies

understand and meet their responsibilities for civil rights compliance when they receive federal funding.

In addition, in March of 2019, DHS Officer for CRCL sent a letter with recommendations to the states and territories where DHS CRCL, OER, and FEMA's Office of Disability and Integration Coordination (ODIC) held the listening sessions. These recommendations, which will be distributed more broadly to emergency management agencies at all levels, are intended to improve the delivery of disaster assistance to persons with disabilities. States and territories, like its counties and any other subrecipients of DHS financial assistance, must ensure that persons with disabilities have equal access to federally funded programs and activities as well as the offer to provide technical assistance to support civil rights compliance.

Recipients and the public alike have access to these recommendations and other federal resources on the DHS webpage, Civil Rights in Emergencies and Disasters, found at <https://www.dhs.gov/civil-rights-emergencies-and-disasters>. CRCL will also be working to raise awareness about the recommendations, and practical ways to implement these, by engaging with national homeland security and emergency management associations.

At the national and regional levels, FEMA convenes disability stakeholders from the public, private, and non-profit sectors to identify strategies, create tools and develop solutions to eliminate gaps in FEMA programs and services to meet the needs of people with disabilities before, during and after disasters. To ensure that all communities are being served during disasters, FEMA has highlighted these initiatives in its 2018-2022 Strategic Plan. FEMA remains committed to incorporating equal access for, and inclusion of, individuals with disabilities in all phases of emergency management.

The draft report contained seven recommendations with which the Department concurs on six and non-concurs on one. Attached find our detailed response to each recommendation. Technical comments were previously provided under separate cover.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,



JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

2

**Attachment: Management Response to Recommendations  
Contained in GAO-19-318**

GAO recommended that the FEMA Administrator:

**Recommendation 1:** Develop and publicize guidance for partners working to assist individuals who are older or have disabilities for requesting data and working with FEMA staff throughout the data sharing process to obtain Individual Assistance data.

**Response:** Concur. FEMA is currently developing new, enhanced templates, policies and guidance for FEMA field staff to facilitate data sharing with States and other partners. FEMA's Recovery Reporting and Analytics Division (RRAD) will be providing a full-service capability to FEMA personnel to support them throughout the data sharing process. In addition, FEMA is expanding its Open FEMA datasets to provide more autonomous, self-service sharing of aggregated data to fulfill partner data needs when personally identifiable information data is not required. FEMA will also be publishing data sharing guidelines to the FEMA.gov internet site soon describing all the ways to obtain FEMA data to best serve individuals that are older or who have disabilities. Estimated Completion Date (ECD): March 31, 2020.

**Recommendation 2:** Implement new registration intake questions that improve FEMA's ability to identify and address survivors' disability-related needs by, for example, directly soliciting survivors' accommodation requests.

**Response:** Concur. FEMA's Individuals and Households Program (IHP) Branch will continue to coordinate with FEMA's ODIC and OER to improve the registration intake questions related to the identification of disaster-related loss to disability-based equipment and services. In addition to that coordination, IHP and ODIC will engage with RRAD to assess the demographic factors that represent the percentage of survivors positively answering registration questions regarding the need for assistive support. The data analysis will also assess whether FEMA's recent addition of help text language within registration intake has improved the number of survivors who positively answer registration questions regarding the need for assistive support.

Based on the analysis, FEMA will determine if the data suggest changes to the existing registration intake questions are necessary or whether new registration intake questions should be developed to improve FEMA's ability to identify and address survivors' accessibility-related needs. FEMA will coordinate any changes to the registration intake questions with the U.S. Office of Management and Budget, as required. ECD: March 31, 2020.

**Recommendation 3:** Improve communication of registrants' disability-related information across FEMA programs, such as by developing an alert within survivor files that indicates an accommodation request.

**Response:** Non-concur. FEMA currently lacks specific funding resources to augment the legacy systems that capture and communicate registration information. However, FEMA is working to improve the Agency's foundational data management and exchange capabilities through the Enterprise Data and Analytics Modernization Initiative (EDAMI), started in April 2017. This long term program is maturing data management across the Agency to improve overall data quality and standardization. EDAMI also includes the development of the FEMA Data Exchange (FEMADex), a modern, cloud-based data-storage solution with an advanced data analytics platform that will allow analysts, decision makers, and stakeholders more ready access to FEMA data. Efforts to share and flag specific disability-related data will be much easier once the Agency has improved these foundational data management and exchange capabilities.

FEMA requests that the GAO consider this recommendation resolved and closed.

**Recommendation 4:** Establish and disseminate a set of objectives for FEMA's new disability integration approach.

**Response:** Concur. FEMA's ODIC is in the process of developing its 2019-2022 Strategic Plan. This plan establishes the objectives, milestones, and tactics to implement FEMA's enterprise level approach to disability integration. ODIC will coordinate with OER to clarify roles and responsibilities between these offices with certain overlapping responsibilities for disability integration, including training.

The development of the Strategic Plan is informed by:

- (a) two Partner Strategy Sessions conducted in Washington, DC with state, local, tribal, and territorial partners as well as Non-Government Organizations and private sector partners in September and October of 2018;
- (b) interviews with Senior FEMA Leadership in Headquarters, across FEMA's programs that provide recovery resources, Regional Administrators, and Field Leadership begun in 2017 and ongoing as of the drafting of this management response letter; and
- (c) an ongoing engagement with FEMA's Continuous Improvement Program.

The Plan is aligned with FEMA's 2018-2022 Strategic Plan, integrating lessons learned through deployments in 2017 and 2018. ODIC is concurrently developing a communication plan to socialize the Strategic Plan throughout the Agency. ECD: June 30, 2019.

**Recommendation 5:** Communicate to Regional Administrators and Regional Disability Integration Specialists a written plan for implementing its new disability integration

staffing approach, consistent with the objectives established for disability integration. Such a plan should include an implementation timeline and details on staff responsibilities, which regions could use to evaluate staff performance.

**Response:** Concur. FEMA's ODIC is in the process of developing a project plan for the implementation of the proposed staffing approach in the Regions. This project plan will include an implementation timeline, detailed roles and responsibilities for the proposed Disability Integration Advisor positions, a force structure for each Region, and recommendations to the Regional Administrator for establishing performance metrics for the new positions that support the Agency's overall enterprise approach to disability integration. This project plan will be completed and presented to the Administrator for review and concurrence. ECD: June 30, 2019.

**Recommendation 6:** Develop a plan for delivering training to FEMA staff that promotes competency in disability awareness. The plan should include milestones and performance measures, and outline how performance will be monitored.

**Response:** Concur. FEMA's ODIC is developing a plan to include a disability integration competency in the Position Task Books for all Incident Management deployable titles in the Agency. This plan will include a communications and outreach plan to socialize the enterprise level approach to disability integration, milestones for measuring the effectiveness of the integration of this competency across the agency, and a monitoring plan and milestones to measure the overall integration of this competency across the deployable workforce. This plan will be presented to FEMA's Field Operations Directorate for concurrence before being presented to the Administrator for approval. ECD: September 30, 2019.

**Recommendation 7:** Develop a timeline for completing the development of new disability-related training the agency can offer to its partners that incorporates the needs of individuals with disabilities into disaster preparedness, response, and recovery operations.

**Response:** Concur. FEMA's ODIC has developed a set of courses of action for updating E/L 0197: "Integrating Access and Functional Needs into Emergency Planning," and an implementation decision by the Acting FEMA Administrator is pending. ECD: June 30, 2019.

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Elizabeth Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov)

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## Staff Acknowledgements

In addition to the contact named above, Sara Schibanoff Kelly (Assistant Director), Sara Pelton (Analyst-in-Charge), Brian Schwartz, and Manuel A. Valverde made key contributions to this report. Also contributing to this report were Carlos S. Aguilar, Aditi S. Archer, James E. Bennett, Sarah Cornetto, Christopher P. Currie, Holly A. Dye, Linda S. Keefer, Amy E. MacDonald, Joel R. Marus, Sheila McCoy, Jean McSween, Amy C. Moran Lowe, Stacy Ouellette, Scott C. Spicer, and John T. Yee.

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