

**BRIEF** OCTOBER 2022

# ANALYSIS OF FEMA EQUITY ACTION PLAN:


Recommendations for Climate Justice.

## KEY REPORT FINDINGS

FEMA's Equity Action Plan will not achieve equity for BIPOC-Frontline Communities on its own. It is comprised of equity assessments from six different FEMA programs with varying abilities to enact their outlined recommendations. Thus, the Equity Plan is more like preliminary equity findings rather than an actionable plan that can be implemented without further legislation.

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# About Just Solutions Collective

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## Just Solutions Collective

[Just Solutions Collective](#) is a BIPOC-led organization working to broaden and deepen the understanding of equitable and effective policies and programs to support the priorities of environmental justice organizations to define, innovate, replicate, and scale their solutions to the climate crisis. We do this work by: identifying and coalescing leading community-created policy solutions; conducting requested, relevant, comprehensive, and accessible policy analysis and research; organizing peer learning, foundational educational programming, space for states to share and strategize; and providing financial support for expertise, ideation and participation.

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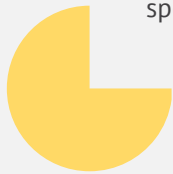
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# Executive Summary

Several agencies and departments have conducted internal Equity Action Plans in response to Biden’s Executive Order 13985 in April 2022. Among those agencies is the Federal Emergency Management Agency (FEMA) which administers many grants and programs before, during, and after a disaster – such as hurricanes, flooding, terrorists, and even COVID-19. Therefore, FEMA’s role in climate and environmental justice is important and their response to equity is a key parameter. This brief covers the following questions: (1) What is in FEMA’s Equity Action Plan; (2) Does it outline equitable actions for Black Indigenous People of Color (BIPOC) and frontline communities; and (3) will FEMA’s Equity Action Plan achieve equity for BIPOC and frontline communities?

Currently as FEMA’s Equity Action Plan stands, it alone will not help achieve equity for BIPOC and frontline communities. The Agency wide plan is comprised of program specific “equity analysis” each with different levels of understanding and capacity to respond to equity. Most importantly, across the agency there is an overall lack of identifying equity actions specifically for BIPOC and Frontline communities most impacted by disasters and is missing measurable relevant equity outcomes to track overtime. Recommendations to achieve equity includes creating accountability measures to BIPOC and frontline communities, providing transparent data to the public around who receives funding especially around income and race, and identifying specific equitable outcomes to track over time.



# Background: Equity Analysis in FEMA

Since the publications of [Equity Action Plans](#) from multiple federal agencies in April 2022 in response to the Biden's [Executive Order 13985](#), many environmental justice and climate justice advocates are asking: what is next? How will federal agencies implement the plan and to what extent do the plans outline equitable actions? Overall, the executive order and the equity plans are a step towards [environmental justice](#), however, the equity impact of each plan varies significantly and will greatly depend on its implementation and the development of more permanent legislation.

Key to environmental and climate justice issues is the Federal Emergency Management Agency (FEMA), whose mission is to help people before, during, and after Presidents declare emergencies or disasters. These disasters include climate related ones such as hurricanes, floods, winter storms, as well as other emergencies such as terrorist attacks and most recently COVID-19. Climate change has increased the frequency and intensity of climate hazards such as hurricanes, which disproportionately affect BIPOC and frontline communities.

Yet there have been accounts of BIPOC and frontline communities receiving less than their fair share of federal disaster assistance from FEMA's disaster response. The inequitable distribution of FEMA assistance seems to be an issue across several of its programs, including Hazard Mitigation Assistance (Muñoz & Tate, 2016), Public Assistance (Domingue & Emrich, 2019), and Individual Assistance (Lamba-Nieves & Santiago-Bartolomei, 2022). Therefore, considering equity at the agency and programs level is essential for climate and the environmental justice.

FEMA recently published the [FEMA Equity Action Plan](#) which complements its larger efforts to integrate equity as outlined in [FEMA's 2022-2026 Strategic Plan](#). In this analysis, we broadly review FEMA's Equity Action Plan, what is in it, what is missing, and outline policy recommendations within this stand-alone document, recognizing that complementary strategies also exist in FEMA's strategic plan and other policy and guideline efforts.

# What is in FEMA's Equity Action Plan?

FEMA has [recently announced](#) its agency wide definition of equity, adapted from President Biden's [executive order on racial equity](#): **"the consistent and systematic fair, just, and impartial treatment of all individuals."** In the Equity Plan document itself, they extend the sentence above with "including individuals who belong to underserved communities of color, persons who belong to communities that may face discrimination based on sex, sexual orientation, and gender identity (including members of the LGBTQ+ community); persons with disabilities, persons who may face discrimination based on their religion, national origin and persons with Limited English Proficiency, and persons who live in rural areas that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life." This part of the definition differs from the executive order on racial equity in that, FEMA's definition does not specifically list persons affected by "poverty or inequality" and instead lists persons who may face discrimination based on "national origin and with Limited English Proficiency."

FEMA's Equity Action Plan also includes what FEMA calls "an initial equity analysis" of six programs in the agency: Public Assistance (PA), Individual Assistance (IA), Hazard Mitigation Assistance (HMA), Nonprofit Security Grant Program (NSGP), National Flood Insurance Program (NFIP), and the Office of the Chief Component Procurement Officer (OCCPO). Each program submitted 1.5 to 3 pages of documentation outlining four considerations: (1) Barriers to Equitable Outcomes, (2) Actions and Intended Impact on Barriers, (3) Tracking Progress, and (4) Accountability.

Each program communicated different levels of understanding around equity and capacity to act on it. FEMA is authorized by the [Robert T. Stafford Disaster Relief and Emergency Assistance Act](#), 42 U.S.C. §§ 5121-5207 (the Stafford Act), which includes a powerful clause, "Regulations for Equitable and Impartial Relief Operation". However, some FEMA programs are also governed by other statutes which can interfere with carrying out this clause. In fact, the OCCPO included in their assessments their inability to implement their equity recommendations without alignment with its governing statute the Federal Acquisition Regulation (FAR) approved by the Office of Federal Procurement Policy. Similarly, the NFIP program included in their equity assessment that until its [flood insurance affordability program](#) legislative proposal is passed, they could do little to implement its equity recommendations to make flood insurance more affordable and accessible to low-income households.

Although Executive Order 13985 called for the development of "Equity Plans" across federal agencies, some of these plans are more like "equity thoughts" with no clear path for implementation or require further legislation to implement. That is why advocates cannot rest alone on the Executive Order and need to push for further and more permanent legislation.



## Does it outline equitable actions for BIPOC & Frontline communities?

Since the NFIP and OCCPO recommendations will not be acted on without further legislative action, we will review the remaining four programs in this analysis: PA, IA, HMA, and NSGP. The table below compares the four programs across six criteria: (1) identifying BIPOC and Frontline communities, (2) outlining specific equity actions, (3) measuring relevant equity metrics, (4) planning outreach to underserved groups, (5) creating accountability to underserved groups, and (6) developing internal accountability.

A color evaluation is given for each criterion under each program. Each criterion is considered met if highlighted green, weakly met if highlighted yellow, and not met if highlighted red. We do not intend to develop an in-depth and robust evaluation of FEMA's Equity Plan in this analysis; instead, this table serves as a broad overview and comparison of the equity assessments provided by the participating programs. Also, the table uses the specific language used by each program as closely as possible, especially as they describe their target population.

First of all, we would like to revisit FEMA's agency wide definition of equity: "the consistent and systematic fair, just, and impartial treatment of all individuals." The impartial treatment of all individuals is more closely align with the definition of equality – treating everyone equally. While there are benefits to adapting the federal executive orders definition, FEMA missed the opportunity to implement equity in a more meaningful way. The FEMA [National Advisory Council \(NAC\)](#) – established through [legislation](#) and representing state, local, tribal/territorial governments, nonprofit, and private-sector emergency management communities – wrote in a [November 2020 report to the FEMA Administrator](#) to center equity in FEMA and defined the term as **"provid[ing] the greatest support to those with greatest need to achieve a certain minimum outcome. It is separate from equality, which is providing the same resources to everyone regardless of need."** Thus, FEMA could have taken the NAC's equity definition which is more aligned with environmental justice and equity. Research has shown that disasters disproportionately affect low-income and communities of color, and that these communities have less existing resources to meet the gaps in disaster assistance to achieve recovery outcomes. Thus, programs that treat all applicants equally often result in inequitable outcomes because they do not account for the particular needs and circumstances of BIPOC and frontline communities.

Overall, FEMA's Equity Plan outlines equitable actions for BIPOC & frontline communities for some of their programs, but not all. Each FEMA program varies in their level of understanding and commitment around equity. For example, the IA and HMA programs had more relevant equity actions and more robust proposed outreach to frontline communities than the PA and NSGP programs. The PA, IA, and HMA programs included strong institutional accountability, however none of the programs had strong accountability measures to frontline communities. In terms of relevant equity metrics, the PA and NSGP programs had none, while the IA program had some relevant but weak equity metrics. The HMA program was the only one that outlined two relevant equity metrics. In the subsections below, we introduce what each of these programs are and discuss notable highlights in their equity assessments.





● Criteria met ● Weakly met ● Not met

Criteria	Public Assistance (PA) COVID-19 Policy only	Individual Assistance (IA)	Hazard Mitigation Assistance	Nonprofit Security Grant Program (NSGP)
Addresses BIPOC and frontline communities	BIPOC, LGBTQ+, disabilities, limited English, low-income	BIPOC, low-income, and communities historically underserved	Underserved and under-resourced communities	Organizations in or serving underserved communities
Specifically identifies two or more relevant equity actions	Will provide technical assistance to all applicants so funding reaches underserved communities Will develop a process for funding recipients to report their strategies for equitable response and understand their legal responsibility	Address language barriers Expand documentation to prove ownership/occupancy Allow ownership self-certification for Mobile Homes/Travel Trailers and heirship properties Bypass SBA loan denial for more lower-income homes Fund accommodations for disaster-caused disability Assistance Teams & Recovery Centers in underserved areas	Use equity for BRIC and FMA evaluation criteria Work with nonprofits, philanthropy and NGOs for non-federal match for underserved communities Prioritize outreach and technical assistance to underserved communities Prioritize hazard mitigation projects in underserved communities Focus mitigation plans on equity and climate change	Will meet with current NSGP grant recipients and subrecipients to solicit feedback on the application and award process and barriers
Identifies two or more relevant metrics of progress	An increased percentage of reports that are "acceptable" [undefined]	An increased percentage of ownership verification An increased percentage of occupancy verification	Increase applicants from underserved communities 40% of benefits to disadvantaged communities	Identify under-represented communities with GIS analysis [no targets]
Includes frontline communities in outreach	Conduct multiple webinars in English and Spanish for COVID response	Prioritize outreach and case processing for historically underserved populations to include Limited English and access and functional needs	Developed outreach plan to reach disadvantaged communities, and those with limited digital access External engagements to understand underserved needs	Meet "relevant" faith-based, civil rights, and CBOs [undefined] GIS-informed outreach to underserved areas
Includes frontline communities in accountability	No	Focus groups with disaster assistance applicants Updated IA Policy Guide based on FEMA RFI equity comments	External stakeholders to evaluate equity outcomes Partner with organizations supporting underserved communities	No
Has Institutional Accountability	Equity incorporated into PA Division senior executive & leadership performance plans	Will add equity in performance management planning	BRIC and FMA participating as pilot programs in the Justice40 Initiative	Will work with DHS Office of the Secretary and Office for Civil Rights & Civil Liberties



# Deeper Analysis of Each Program's Equity Assessment

## Public Assistance (PA)


The PA program is the largest federal disaster assistance relief program (larger than FEMA's IA and HMA and HUD's CDBG) in the United States. It provides grants to State, Local, Tribal, and Territorial (SLTT) governments, and certain types of private nonprofit (PNP) organizations for Presidentially declared emergencies and disasters to fund debris removal, emergency protective measures, and restoration of disaster-damaged facilities.

The PA program decided not to evaluate its entire program around equity. Rather, it developed a sub-assessment of its COVID response ([FEMA Policy #104-21-0004, Interim, Version 2, March 2021](#)) and whether it led to more equitable use of assistance. COVID disproportionately impacted BIPOC, low-income, and LGBTQ+ communities, and an equity evaluation of its federal response is important. However, any equity actions implemented and suggested from its COVID policy are only applicable to COVID-19 activities and does not necessarily apply to the rest of PA's program, such as hurricane, flooding, and fire response, which account for most of the history and spending of the PA program. Thus, advocates need to ensure that any lessons learned from FEMA Policy #104-21-0004 are truly implemented in the rest of [PA's Program and Policy Guide](#), last updated in June 2020 and which to date has no equity guidelines.

Overall, the PA program outlined **6 actions** in their assessments, ranging from education to reviews. Most notably, the program makes a commitment to develop a process for recipients and subrecipients to report their strategies for equitable response. This implies that recipients (such as States, Local, Tribal and Territorial governments) would have to report how they are distributing the funds equitably. Right now, the distribution of disaster assistance is solely at the discretion of the state governor, provided they can prove the counties they select were affected by the disaster. A requirement for equity distribution can help communities advocate for why they were not included as recipients of aid. However, it is not yet clear whether reporting will be a requirement and what consequences there will be for non-compliant entities.

## Individual Assistance (IA)

The IA program provides assistance to disaster affected individuals and households primarily through housing assistance, which includes providing temporary housing units or money for rent, money for homeowners to repair damaged homes, and on rare occasions, for the replacement or construction of a home. A smaller component of the IA program also includes support for crisis counseling, case management, legal services, unemployment assistance, emergency assistance, and other needs related to the declared disaster.



The IA equity assessment included **21 actions** including improving external messaging, expanding ownership and occupancy verification, increasing funding, and enhancing access. Six notable actions are included in the table that address a range of vulnerability issues from language barriers, low-income needs, disabilities, to renter and mobile home needs.

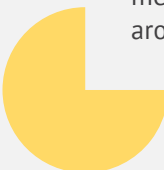
Notably, the action to allow ownership self-certification for mobile homes, travel trailers and heirship properties is of significant impact to low-income and communities of color. That is because these communities are less likely to be single-household homeowners and are more likely to live in multi-family occupied heirship properties (properties rightly occupied by descendants or heirs but without cleared property title). Research on the equitable distribution of FEMA assistance has shown that in past disasters, multi-family occupied housing was common among Latinx and other immigrant and refugee communities with mixed-citizenship status, yet only the specific family that could prove legal ownership of the property was eligible to receive disaster assistance. Further, families in mobile homes and travel trailers often experience complete destruction of their homes and all their personal belongings, including legal documentation of ownership, if they had any. Disaster survivors were asked to follow strict and bureaucratic processes for documentation of ownership to be eligible for assistance under already so much loss and chaos. Expanding ownership documentation and allowing self-certification as a last resort can provide much needed flexibility and relief to low-income and communities of color in vulnerable housing.



## Hazard Mitigation Assistance (HMA)

The HMA program provides SLTT governments with funding for mitigation and resilience needs before, during, and after a disaster. The HMA has three programs, the Hazard Mitigation Grant Program (HMGP), the Building Resilience Infrastructure and Communities (BRIC) program, and the Flood Mitigation Assistance (FMA) program. The last two programs, BRIC and FMA, are participating as pilot programs in the [Justice40 Initiative](#) and have a goal that 40% of the overall benefits of investments flow to underserved communities. The HMA program outlined **16 actions** in their equity assessment from participating in the Justice40 Initiative, data access, program design, and outreach and engagement. Five of their notable actions are included in the table.

Specifically, their action to prioritize technical assistance to underserved communities is notable, especially if provided as full-cycle resources from grant application, planning, to implementing mitigation projects. Currently, many under resourced BIPOC and low-income communities are ineligible for HMA mitigation and resilience grants because they do not have a FEMA-approved Hazard Mitigation Plan. In other words, marginalized communities that lack the resources to implement mitigation projects (need HMA grants) are somehow expected to have those same resources to develop a Hazard Mitigation Plan. Yet there are several small municipalities, rural communities, and low-income BIPOC communities that do not have the capacity or planning staff to develop mitigation plans, let alone implement them. Providing technical assistance for applying, planning, administering, and implementing mitigation plans and projects would significantly increase community capacity and eligibility.



Another notable element of HMA's equity assessment is its two relevant and impactful equity metrics to track progress, which the other three programs lacked. The first equity metric is around procedural equity, with the goal of increasing the number of applicants from underserved

communities. Meeting this goal would entail increasing access and reducing procedural barriers in the application process and eligibility requirements. The second equity metric is around distributive justice, with the goal of allocating 40% of the BRIC and FMA program benefits to underserved communities as part of the Justice40 Initiative.

## Nonprofit Security Grant Program (NSGP)

The NSGP provides for physical security enhancements and other security-related activities for non-profit organizations that are at elevated risk of terrorist attack based on their ideology, beliefs, and/or mission. The NSGP included **7 actions** in their equity assessments, all of which included reviewing their program to find out what are the barriers and potential actions. In other words, there was no clear understanding of its existing barriers to equity, no clear path on actions, and no indication there is an understanding of who is underserved in their program.

Unfortunately, their 7 actions and their plan to track progress does not indicate they will truly identify equitable barriers and actions even if all their suggested actions were implemented. This is because they are primarily relying on existing recipients to solicit feedback on application process and barriers, which would exclude the experience of the organizations systematically underrepresented in their program. Although outreach does include “relevant” community, civil rights, and faith-based organizations, there is no clear indication of what they qualify as “relevant” or indication that they will conduct specific outreach to low-income and BIPOC serving organizations. When they do mention “outreach efforts targeting underserved or marginalized communities,” these efforts are informed by desktop GIS analysis, rather than relationship-based outreach such as focus groups, webinars, and other types of community engagement. Overall, this program did not identify equity actions or metrics.

## Will FEMA’s Plan Achieve Equity for BIPOC & Frontline Communities?

The short answer is no. Not on its own. FEMA’s Equity Plan is comprised of equity assessments from six different FEMA programs with varying abilities to enact outlined recommendations. Thus, the Equity Plan is more like preliminary equity findings rather than an actionable plan that can be implemented without further legislation. [FEMA’s Equity Action Plan](#) is not inclusive of all the programs FEMA administers and each program’s level of understanding and commitment to equity, especially for BIPOC and Frontline communities, varied greatly. Thus, the level of integration and streamlining between FEMA’s Equity Action Plan, [FEMA’s 2022-2026 Strategic Plan](#), and other program and policy guides are key to obtain a comprehensive picture of FEMA’s current state and future direction around implementing equity. For this analysis, we solely analyzed FEMA’s Equity Action Plan as a first step towards a comprehensive review of its policies and programs around equity.



Currently, as they stand, the Equity Action Plans are not codified in statute which can be reversed by the next president. However, reviewing existing equity gaps in the Equity Action Plan, Strategic Plan, and program and policy guidelines will ultimately help inform legislative reforms that can better address equity needs in the long-term. Thus, FEMA's efforts as outlined in their Equity Action Plan provide valuable insights in current equity gaps and potential actions that can be further informed by climate and environmental advocates. Climate and environmental advocates should continue to push for legislative reforms across federal agencies and programs, especially because existing statutes sometimes limit direct implementation of equity actions identified by the programs, such as the case for the NFIP affordability recommendations. Simultaneously, FEMA and other agencies would benefit greatly from reaching out and engaging community stakeholders to gain better insights on how proposed equity actions might or might not achieve equity on the ground.



## Policy Recommendations

- FEMA should leverage the Stafford's Act non-discrimination clause and the National Advisory Council's definition of equity to better define equity, equity actions, and its related outcomes. Of special concern is that FEMA's definition of equity does not include low-income or poverty.
- All programs need to improve their measures of equity outcomes and provide opportunities for external and public evaluations, by making relevant data public, including the race/income demographics of applicants.
- All programs should create robust outreach plans to BIPOC & frontline communities and developed proposed plans for how FEMA programs will be held accountable or at least be transparent to these communities.
- FEMA indicates "moving forward, FEMA will work to clarify the Recipient's legal responsibility and to structure a more comprehensive reporting process...to develop and report on their [Recipients and Subrecipients] strategies for equitable response and recovery." This effort is a right step forward and should also indicate the extent to which equity will be enforced once those reports are evaluated and any consequences.
- The Public Assistance program should provide a follow-up assessment and indicate the extent to which equity efforts in response to COVID-19 will translate to the rest of its programming. Overall, this program needs to identify relevant equity actions and outcome metrics.
- The Individual Assistance program has several good equity actions, however, there needs to be specific measures to address bias in FEMA inspections which assess damage value of homes and plays a significant role on eligibility of applicants and how much money individuals receive. There should also be specific technical assistance to help low-income communities and those with lower social capital to navigate, if they want to, an appeal process. Equity outcomes should also include number of new applicants and quantity of assistance provided to low-income and applicants of color as specific equity metrics.

- The Hazard Mitigation Assistance program outlines several equitable actions and measurable outcomes. If HMA will move forward on “a pilot for the Hazard Mitigation Grant Program... to test how partnerships with private nonprofits, non-governmental organizations (NGO) and philanthropic organizations can provide the non-federal match and ease the financial burden on underserved communities” than a recommendation is to include providing direct capacity and funding (potentially through other federal programs) and to especially work with BIPOC and frontline CBOs.
- The Nonprofit Security Grant Program’s equity plan was the weakest out of all the programs. There is no indication of current understanding of who is marginalized in this program nor a strategic plan to identify these groups. There needs to be more comprehensive outreach that is on the ground rather than solely relying on desktop analysis. Focus groups, outreach to BIPOC and frontline CBOs are strategies that can better inform equity actions and needs.



## Conclusions

In the [Funding Requirements Report for the Disaster Relief Fund for Fiscal Year 2022](#), FEMA reported an estimated \$16.8 billion of needed funding for major disasters, such as Hurricane Harvey, Irma and Maria which disproportionately affected BIPOC and frontline communities. Recent evidence suggests that FEMA assistance is not equitably distributed to low-income, BIPOC, and frontline communities. Therefore, an assessment of FEMA’s efforts towards equity across its program and at the agency level are important to determine the extent to which they will achieve equity. The current FEMA Equity Action Plan is a step forward, however, is missing several key components such as clear BIPOC and frontline equity actions for all its programs, the measurement of relevant equity outcomes to keep track of progress, and amendments to current legislation and policy that will enable the programs to act on those plans. At the agency level, there is also a need for accountability to and engagement of BIPOC frontline communities whose feedback is critical to understanding the impact equity plans are having on the ground. FEMA also prioritized equity as one of the three main objectives for FEMA’s 2022-2026 Strategic Plan, thus there is more to consider with regards to a comprehensive review of equity in FEMA.

Just Solutions Collective will publish additional briefs analyzing FEMA’s strategic plan and program and policy guides to provide a more in-depth review and recommendations.



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## About the Author

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