

To: Senate Homeland Security and Governmental Affairs Committee

From: National Low Income Housing Coalition, National Consumer Law Center (on behalf of their low-income clients), Partnership for Inclusive Disaster Strategies

Re: Priorities for FEMA Under New DHS Leadership

Date: March 16, 2026

_ Introduction

On March 5th, Department of Homeland Security (DHS) Secretary Kristi Noem was ousted from her position. As it relates to disasters, Secretary Noem's tenure at DHS saw profound [cuts](#) to the Federal Emergency Management Agency's (FEMA) workforce, new [bureaucratic hurdles](#) for resource deployment, unprecedented [delays](#) in grant distribution, and staggering [politicization](#) of the FEMA processes.

While a new DHS Secretary is a promising step, personnel and leadership change alone is insufficient to address decades of [systemic failure](#) that have left disaster survivors across the country without the timely, accessible, and adequate aid. Regardless of who is in charge of DHS, we should all continue to support our common-sense, community-driven [solutions](#) to our country's broken disaster recovery system

President Trump announced that he will be nominating Oklahoma Republican Senator Markwayne Mullin to replace Secretary Noem as head of DHS. It is unclear what internal changes at FEMA this new Secretary may bring. As a result, Congress should demand the following sorely needed reforms are enacted – including undoing internal processes that delayed or prevented assistance from reaching disaster survivors over the last year and a half – before considering the DHS Secretary nominee's confirmation.

These priorities have been reviewed by numerous stakeholders in different parts of the country. They represent day 1 priorities for nominee Mullin to accomplish if we are to ensure that our country's disaster response and recovery system can continue to assist communities before, during, and after disasters. Committee members are encouraged to use these priorities to question nominee Mullin as he is vetted for the top role at DHS. The requests below are grouped into 8 categories, corresponding to broad requirements for getting the Federal Emergency Management Agency is able to accomplish its role in 2026:

1. Ensure FEMA's Independence
2. Stop Politicizing Disasters
3. Restore and Protect Staff
4. Appoint Expert Leadership
5. Remove Arbitrary Barriers
6. Ensure Community Preparedness
7. Build Transparency into the System

8. Foster Collaboration with Other Agencies

Note: Suggestions marked with a * are reflected in the bipartisan Fixing Emergency Management for Americans (FEMA) Act (H.R.4669) introduced by Transportation and Infrastructure Committee Chairman Sam Graves (R-MO), Committee Ranking Member Rick Larsen (D-WA), former Economic Development, Public Buildings, Emergency Management Subcommittee lead Republican Daniel Webster (R-FL), and Economic Development, Public Buildings, and Emergency Management Subcommittee Ranking Member Greg Stanton (D-AZ) and 62 additional [cosponsors](#).

Requests:

1. Ensure FEMA's Independence –

- a. * **Separate the daily functions of FEMA from those of DHS** to ensure FEMA has the independence necessary to fulfill its mission, competent and expert leadership to take the helm when disaster strikes, and its own, dedicated resources, including staff. Historically, this is how FEMA has functioned, to varying degrees of success, in an effort to carry out a mission that must remain focused on protecting disaster survivors regardless of shifting policy priorities at DHS.
- b. **Prioritize the well-being, stability, and accessibility of aid to all disaster survivors.** All survivors are entitled to FEMA Mass Care and Emergency Assistance in the aftermath of a disaster. Thus, responders' first priority should be preventing harm, helping disaster survivors stay safe, and making sure basic needs are met. To avoid magnifying chaos and confusion in the aftermath of disasters and ensure that all available resources are being used to assist disaster survivors, DHS must reinstate its previous Sensitive Locations Policy. This policy would prevent immigration enforcement in certain locations – including disaster impacted areas and emergency shelters – that can prevent disaster survivors from accessing life-saving assistance and take up the resources necessary to keep families safe.
- c. **Keep disaster survivors' data safe** so they can access the benefits for which they are entitled. Historically, both Democrat and Republican FEMA administrators have issued statements saying that FEMA doesn't routinely share information with other DHS agencies. However, this statement was not reiterated during Secretary Noem's tenure. To ensure that disaster survivor data is safe and that fear and confusion does not prevent access to disaster assistance, they must publicly confirm it has no plans to facilitate such data sharing.

2. Stop Politicizing Disasters and Delaying Disaster Assistance–

- a. **Disaster aid should be distributed based on demonstrated need, not [political whims](#)** favoring Republicans or Democrats. Disasters do not care about political affiliation and, as a result, neither should our disaster recovery system. During disasters, all communities must have access to the resources they need to respond and recover from disasters.
- b. **Reopen and reevaluate the disaster declaration requests** made under

Secretary Noem's DHS tenure. Under Secretary Noem's tenure we have seen unprecedented levels of [politicization](#) of major disaster declaration requests. On average it has taken 37 days for an approval and 107 days to receive a denial - well above normal response times for such requests. Such decisions must be made on need, not political affiliation.

- c. **Revisit and reexamine Individual Assistance applications** submitted under Secretary Noem's term. Staffing cuts and politically-influenced delays have recently [delayed](#) disaster assistance availability - making it even more difficult for disaster survivors to recover. As a result, disaster survivors across the country have not gotten the option to submit an Individual Assistance application or have waited for months without an eligibility determination. Reopening application periods will provide disaster survivors the ability to apply for and receive the assistance they are eligible for.
- d. **Remove the requirement that any expenditure above \$100,000 must be approved directly by the DHS Secretary.** During Secretary Noem's time at DHS, the agency exerted unprecedented control over FEMA operations. This resulted in major [delays](#) in distributing disaster assistance. Most notably, the requirement left calls [unanswered](#) during the floods in Texas last year when the contract for the FEMA call center expired and billions in grant funds unissued. FEMA's ability to respond to a disaster and deploy the resources survivors and communities need should not be constrained by bureaucratic red tape that puts requests to deploy Search and Rescue and other urgent disaster response resources in line with routine spending requests from across DHS. This requirement must be removed to ensure that disaster-related programs can quickly reach impacted communities and disaster survivors.
- e. **Disaster declarations should include hazard mitigation to reduce future losses.** FEMA should modify existing active disaster declarations to make funds available to state and local governments via the Hazard Mitigation Grant Program (HMPG) and should commit to rapid review of existing applications for assistance under the program. Ensuring access to this important hazard mitigation funding will ensure that losses to life and property from future disasters are mitigated.

3. Restore and Protect Staff –

- a. **Restore the Office of Disability Integration and Coordination (ODIC), the Disability Integration Cadre, and hire an ODIC Director with disability and disaster recovery expertise.** Created in response to the Post-Katrina Emergency Reform Act, ODIC helps FEMA deliver the agency's shared mission of helping people before, during and after disasters in ways that maximize the inclusion of, and accessibility for, people with disabilities. During Secretary Noem's tenure, staffing at ODIC declined and senior professional leadership departed as the office merged with the FEMA Office of Civil Rights. This severed many of ODIC's resources and diminished its scope within the agency, weakening its statutorily mandated roles and responsibilities.
- b. **Ensure every FEMA region has a Disability Integration Specialist** to provide

support and technical assistance ensuring that individuals with disabilities and access and functional needs are served throughout emergency management operations. As of this writing multiple regions do not have a Disability Integration Specialist. As a result, organizations working with individuals living with disabilities in disaster impacted areas have no point of contact at FEMA, leaving it all the more likely that those entitled to specialized assistance fall through the cracks.

- c. **Reinstate the contracts of Cadre of On-Call Response/Recovery (CORE) employees** who were [terminated](#). CORE employees are the backbone of FEMA's workforces, deploying to disaster-affected areas to assist local officials with response and recovery, sometimes for years. They make up nearly half of FEMA's workforce, but since 2024, FEMA has slashed more than 1,000 contracts or about 10% of that workforce.
- d. **Reinstitute Americorp's National Civilian Community Corps (NCCC)** to assist FEMA, nonprofits, local, state, and federal agencies, faith-based organizations, and tribal groups in their disaster response and recovery work. Despite longstanding bipartisan support for the program, it abruptly [ended](#) in April of 2025, leaving key organizations working in disaster-impacted areas without much needed additional capacity and support.
- e. **End bans on travel for FEMA employees and training programs for state, territorial, tribal, and local partners** that have continued to degrade the country's ability to effectively respond to disasters. Over the last year, DHS has moved to suspend numerous training programs, both online and at institutions around the country, and prevented FEMA employees from traveling to related training events and programs. Regardless of one's opinion on the future of FEMA, capacity building and relationships between these responding governments are pivotal to addressing the impacts of future disasters.

4. Appoint Expert Leadership –

- a. **Appoint a FEMA Administrator and senior staff with a longstanding history of expert, objective emergency management experience.** The Robert T. Stafford Disaster Relief and Emergency Assistance Act requires that the FEMA Administrator have demonstrated ability and knowledge of emergency management and years of executive leadership and management. The current administration has failed to appoint an Administrator with these credentials and has instead cycled through three "acting" Administrators with little background in emergency management. In addition, numerous key positions throughout the agency have been left unfilled - from regional administrators to chief counsels. These gaps reduce operational capacity and slow the flow of much needed expertise and capacity to disaster-impacted communities. A competent Administrator that meets statutory requirements must be appointed and supported by experienced emergency management leaders rapidly hired to fill key positions left empty.

5. Remove Arbitrary Barriers –

- a. **Reinstate the Disaster Survivor Assistance (DSA) Teams** who are

responsible for going door-to-door to help disaster survivors in impacted communities access aid and collecting timely, relevant information to inform high level decision making related to overall response. In May of last year, Secretary Noem decided to [eliminate](#) these crucial team jobs, limiting access to federal assistance for rural, disabled, and elderly disaster survivors who have the greatest needs.

- b. **Provide aid on the basis of categorical [eligibility](#)** rather than a system of ineligibility executed through [confusing](#) denials and appeals. FEMA can ensure that all disaster survivors get the assistance for which they are entitled to and do so in a timely manner through the use of damage assessments, geographic information, and data from existing public assistance programs. This is already how a number of federal programs function including Social Security, SNAP, and Temporary Assistance for Needy Families. At the very least, applicants to disaster assistance programs must be provided clear information regarding any denials of assistance with a clear pathway to appeal.
- c. **Adopt and make public a simple declarative statement** form to prove residency and ownership of properties. While FEMA expanded the list of acceptable documents that can be used to show ownership of disaster damaged homes and permitted the use of self-declarative statements for individuals living in manufactured housing or insular areas, FEMA doesn't describe what the document must entail, nor does it provide a standardized form allowing survivors to efficiently meet this requirement. FEMA should expand access to this solution to all disaster survivors and create a standardized form for the use of disaster survivors.
- d. * **Address financial barriers that prevent survivors from accessing the Transitional Sheltering Assistance (TSA) program** by eliminating daily "resort fees" and reducing unnecessarily burdensome paperwork. Hotels enrolled in TSA often charge daily "resort fees" and require security deposits or credit cards that can prevent low-income families from accessing this assistance. Additionally, survivors must continue to submit paperwork to extend their stay every 14 days creating additional uncertainty for impacted households attempting to recover.
- e. * **Ensure individuals experiencing homelessness can access the same FEMA assistance available to renters.** Currently, FEMA refuses to provide housing assistance to individuals who were experiencing homelessness before the disaster, claiming that the person's "need for housing was not caused by the disaster." The current eligibility scheme allowing those residing in "non-traditional structures" to access small amounts of housing assistance rarely plays out in practice, leaving families experiencing homelessness to be the hardest hit by disaster with the fewest resources to recover.
- f. **Ensure that federally subsidized tenants whose units are damaged by a disaster can access Continued Rental Assistance.** Though federally subsidized tenants are eligible for FEMA rental assistance, they often experience denials or barriers to assistance related to duplication of benefits, despite the fact that their subsidized units are unlivable. FEMA must prioritize improving

communication with HUD and USDA post-disaster, and improving training for FEMA staff on duplication of benefits, to ensure that HUD and USDA-subsidized tenants have equal access to post-disaster rental assistance until they can return to their subsidized units.

6. Ensure Community Preparedness –

- a. **Re-instate the Building Resilient Infrastructure and Communities (BRIC) grant program**, which was signed into law under the first Trump [administration](#) and saves federal funds by preventing the worst impacts of future disasters and will save the lives of future families impacted by disasters. BRIC is the federal government's largest hazard mitigation program and reflects a growing [bipartisan](#) understanding that disasters are no longer confined to a single season and require proactive action before disaster occurs. Despite [judicial orders](#) requiring reinstatement of the program, it remains inactive.
- b. **Re-establish the Flood Mitigation Assistance (FMA) and Flood Mitigation Assistance Swift Current (Swift Current) grant programs** which are the [second largest](#) hazard mitigation programs and aim to aid properties impacted by destructive and destabilizing floods. Specifically, FMA was created after the passed of the National Flood Insurance Reform Act of 1994 and works to lower or completely eliminate the risk of repetitive flood damage. Building on the success of FMA, Swift Current aids property owners who have insurance through the National Flood Insurance Program (NFIP) and have a history of repetitive or substantial damage from flooding.
- c. **Ensure the Emergency Management Preparedness Grant (EMPG) and Hazard Mitigation Grant Program (HMGP) are adequately funded and distributed in a timely manner.** These programs are the backbone of emergency management offices across the country. In many states and territories and tribal nations, the majority of emergency management budgets consist of EMPG grants. Most localities currently don't have set asides for disaster recovery, much less disaster [preparedness](#). Taken together, this means many areas of the country, especially rural states with limited fiscal capacity, will be unable to maintain emergency management programs without these programs.
- d. **Build in flexibility to the overall damage threshold required to receive a major disaster declaration** to ensure all communities, particularly small, rural, and economically distressed communities, can access the aid they need to recover after disasters. FEMA uses a per capita [indicator](#) to create a baseline for assistance. This puts small, rural, and economically distressed areas at a [disadvantage](#) and often limits the levels of assistance available after disasters.
- e. **Reinstate the Future Risk Index** that was [removed](#) from public view last year. Launched in late 2024, this prototype index cataloged and displayed projected economic losses at the county level from different climate change scenarios. Designed as a supplement to FEMA's [National Risk Index](#), the database was the first free, publicly available, tool to demonstrate future impacts from climate change on communities across the country.

7. Build Transparency into the System –

- a. **Continue to update, fund, and staff OpenFEMA** to provide insight into disaster recovery programs and progress. OpenFEMA is currently the [only](#) source of open and semi-accessible data the agency provides to the public. While there are many improvements that should be made to the database around accessibility and available data, OpenFEMA, as it stands currently, provides extremely valuable insight to disaster survivors, organizations working with them, and FEMA itself. Data transparency allows FEMA to be informed about program results, make improvements, and incorporate best practices.
- b. **Work with academic and research institutions to track program outcomes across response, recovery, and mitigation.** Applications and assistance outcomes must be tracked over the long term to enhance data collection and analysis capabilities. This is crucial to ensuring that agency programs are assisting impacted households and provide baseline metrics for future program improvements. Unlike other federal agency's, like HUD, there is no system through which academic or research institutions can work with FEMA - preventing robust and independent analysis of disaster response and recovery programs.
- c. **Ensure the Office of Civil Rights is robustly staffed and resourced and all FEMA personnel are trained on civil rights requirements.** This is necessary to make certain that there is clear guidance and compliance with non discrimination laws, including the Stafford Act, the Americans with Disabilities Act, Fair Housing Act, Title VI, and other civil rights laws, to ensure fairness and avoid delays due to enforcement actions.

8. Foster Collaboration with Other Agencies –

- a. **Activate the Disaster Housing Assistance Program (DHAP)** for all disasters moving forward. DHAP provides low-income survivors with direct, longer-term rental assistance and case management services by local housing professionals. FEMA should immediately enter into an interagency agreement (IAA) with HUD to allow the housing agency to stand up its DHAP program as quickly as possible following disasters.
- b. * **Create a universal application** for FEMA, HUD, SBA, and other disaster recovery agencies to reduce the administrative burden throughout the disaster recovery process.
- c. * **Enter into an interagency agreement with the Small Business Administration (SBA) and HUD** to ensure all three agencies share information and avoid duplication of benefits (DOB), including housing recovery and disaster remediation resources. DOBs and as a result Recoupment of Benefits can be common due to the confusing nature of our disaster recovery system and lack of consistent, expert housing case managers throughout the entirety of the process.