



May 15, 2025

Mr. Patrick Powers
Designated Federal Officer
Federal Emergency Management Agency Review Council
Office of Partnership and Engagement
Mailstop 0385
Department of Homeland Security
2707 Martin Luther King Jr Ave. SE
Washington, DC 20032

Subject: [Request for Public Input on Experiences With FEMA Disaster Responses \(90 Fed. Reg. 13771 \[March 26, 2025\]; Docket No. DHS-2025-0013\)](#)

Dear Mr. Powers:

On behalf of the National Association of REALTORS®, representing 1.4 million members involved in all aspects of real estate, thank you for the opportunity to respond to the above-captioned request for information.

REALTORS® bring firsthand experience with FEMA's disaster response efforts, whether as survivors themselves or as professionals connecting displaced families with temporary housing and other resources during recovery. Their expertise proves invaluable to clients navigating real estate transactions in disaster-stricken areas, offering critical guidance during what are often people's most vulnerable moments. Beyond individual client services, the [REALTORS® Relief Foundation](#) provides targeted financial assistance to disaster survivors, helping cover housing-related expenses, such as mortgage payments and rental costs, to ensure they have temporary shelter while beginning the challenging process of rebuilding.

Overall Recommendations:

1. **Preserve federal initial disaster response capabilities**, which have significantly improved since Hurricane Katrina in 2005. REALTORS® generally give high marks to FEMA for the initial response phase, which involves quickly mobilizing resources, coordinating with state and local governments, and delivering emergency relief and rescue resources in the immediate aftermath of a disaster. Unfortunately, any goodwill

among the survivors tends to be lost as they transition to the recovery phase, where most concerns arise. We encourage the Council to focus on reforming longer-term recovery programs.

2. **Streamline longer-term recovery programs** to bridge the gap between emergency response and permanent housing restoration. There is a significant gap between expectations and reality due to the disaster assistance restrictions of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. REALTORS® regularly guide clients through confusing and complex recovery processes and encourage the Council to address the disconnect between survivor expectations and program realities while preserving necessary program integrity.
3. **Expand federal mitigation grant programs**, which deliver a significant return on investment—preventing an average of \$6 in future taxpayer-funded disaster losses for each dollar invested in risk mitigation and resilience. These programs are essential for real estate professionals to help clients with uninsurable or repeatedly damaged properties. Mitigation grant programs help provide an invaluable option to reduce the cost and increase the availability of home insurance.
4. **Reauthorize and reform the National Flood Insurance Program (NFIP)** as part of a broader FEMA reorganization. The NFIP, which provides over \$1.3 trillion in insurance to 4.7 million policyholders, supports half a million home sales annually and contributes \$70 billion to the economy, but requires reforms to improve flood mapping, risk communication and mitigation programs, address the debt and risk concentration, and encourage a private market for flood insurance.

Program Structure and Evaluation

FEMA Disaster Assistance Programs operate across three distinct phases: response, recovery, and resiliency. The response phase occurs in the first few days following a disaster, focusing on immediate emergency relief, coordination and support. The recovery phase begins after the immediate threat is over, involving the medium-term process of rebuilding the community, restoring services, and helping residents return to stability. The final resiliency phase represents the long-term effort to build permanent infrastructure and properties engineered specifically to withstand future disasters, breaking the cycle of repeated damage and reconstruction.

Below we provide our detailed assessment of each program phase:



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Response (Rating: Meets Expectations)

According to the GAO, FEMA has significantly improved its initial disaster response capabilities since Hurricane Katrina in 2005.¹ This includes enhanced logistics and emergency support to quickly mobilize resources, coordinate with state and local governments, and deliver emergency relief and rescue resources to affected communities. These abilities were on full display during the COVID-19 pandemic when FEMA assisted the U.S. Department of Health and Human Services by coordinating vaccine distribution. NAR members generally give high marks to this first phase of disaster response.

Unfortunately, survivors often conflate this with the second phase of disaster recovery, which tends to take too long, offers limited assistance, and is generally frustrating to navigate. REALTORS® encourage the Council to preserve federal initial response capabilities and focus on the next phase, which is disaster recovery.

Recovery (Rating: Needs Improvement)

NAR members have raised several concerns during the recovery phase after the immediate disaster threat has passed and before homes and communities have been permanently restored:

- **Limited FEMA Involvement:** Disaster survivors often don't understand why FEMA isn't present during more disasters. In most cases, the Red Cross or other voluntary organizations active in disasters take the lead in creating disaster recovery response centers to match survivor needs with donations through various platforms. The confusion arises because, under the Stafford Act, federal assistance activates only for natural disasters, fires, and explosions after a state requests help and the President declares a major disaster, determining that the situation exceeds state and local government capabilities.
- **Amount of Disaster Aid:** Survivors often expect FEMA to fully restore their homes, creating significant disappointment when they receive individual and household assistance payments averaging just \$4,000—an amount insufficient to replace even basic appliances, much less rebuild an entire home. This gap between expectations and reality stems from the Stafford Act's limitations, which restrict FEMA aid to address only “necessary, serious, and unmet needs.” In practice, this

¹ U.S. Government Accountability Office. (2019). **Emergency Management: FEMA Has Made Progress, but Challenges and Future Risks Highlight Imperative for Further Improvements** (GAO-19-594T). Retrieved from <https://www.gao.gov/products/gao-19-594t>



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typically takes the form of temporary housing assistance or the bare minimum repairs to make a home “safe and sanitary.” Further complicating matters, FEMA must withhold or reduce the assistance to ensure there is no “duplication of benefits”—for example, by not providing financial assistance for home repairs already covered by the property owner’s insurance.

- **Temporary Housing:** Survivors expect to be housed until their homes are fully rebuilt. However, FEMA housing assistance is limited by statute to 18 months with extensions in very limited circumstances. This creates a gap between short-term emergency housing and permanent home restoration. After FEMA’s assistance expires, survivors are typically directed to other federal programs: SBA disaster loans for those who qualify, or HUD programs, particularly the Community Development Block Grant Disaster Recovery (CDBG-DR) program. However, SBA loans require repayment capacity, which many survivors lack, and CDBG-DR requires Congress to provide an ad hoc authorization and specific funding which can take years to implement and leaves many families without clear housing solutions during this critical transition period.
- **Complex Application Process:** The process of applying for aid is often seen as overly bureaucratic, complicated, and particularly burdensome for survivors who may have lost all their personal documentation in the disaster. Applicants must provide proof of identity, ownership, occupancy, and damage even when their homes and all their possessions have been destroyed. Survivors do not understand that Congress requires FEMA to implement these verification procedures to protect against waste, fraud, and abuse, and to ensure that benefits are only delivered to eligible U.S. citizens who are verified as the owners of the damaged properties. This tension between program integrity and the immediate needs of disaster victims creates significant frustration during an already traumatic time.
- **Differences in Payouts by State:** There is also confusion about why the amount of aid varies by disaster and state. FEMA has studied this,² and the differences appear to be primarily driven by the differing costs of temporary housing and repairs, with some states having higher costs of living and more expensive housing. However, this may not reassure survivors who have lost everything, as they may still feel the aid is

² FEMA, DHS. *Individual Assistance Program Equity*, 89 Fed. Reg. 3990 (Jan. 22, 2024) (Interim Final Rule), [Document No. 2024-00677](#).



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insufficient to cover their immediate needs and long-term recovery. The disparity in payouts can lead to frustration and a sense of inequity among those affected by disasters.

Resiliency (Rating: Meets Expectations)

REALTORS® urge the Council to help make safe homes affordable through substantial federal investments in federal disaster risk mitigation grants. Research by the National Institute of Building Sciences shows that every dollar invested in mitigation saves six dollars in future disaster costs. We support repurposing the Building Resilient Infrastructure and Communities (BRIC) program to align with administration priorities. These programs are essential for real estate professionals to help clients with uninsurable or repeatedly damaged properties. Mitigation grant programs provide a valuable option to recommend. Helping homeowners harden their properties against natural disasters reduces risk, lowers insurance costs, and supports more stable, risk-based homeowners premiums. While BRIC and other federal mitigation grant programs help reduce vulnerable housing stock, REALTORS® consistently note two critical limitations: insufficient funding to meet nationwide demand, and a reactive funding model that prioritizes post-disaster retrofits over more cost-effective resilient new construction. Incorporating resilient building standards during initial construction is substantially more affordable than retrofitting existing structures—a process that often proves financially prohibitive for many homeowners.

National Flood Insurance Program (Rating: Exceeds Expectations)

REALTORS® urge the Council to reauthorize and reform the National Flood Insurance Program (NFIP) as part of a broader FEMA reorganization discussion. The NFIP, housed within FEMA's resiliency division, provides \$1.3 trillion in insurance to 4.7 million policyholders across 23,000 communities. It supports nearly half a million home sales annually, creating a million jobs and contributing nearly \$70 billion to the economy, according to NAR research.

The NFIP's success is due to a small, dedicated team that partners with 50 insurance companies and local governments to administer the key components of the program. By requiring communities to adopt building standards to qualify for flood insurance, the NFIP promotes responsible, safer, stronger development in high-risk areas. The NFIP's new rating methodology charges full risk rates, encouraging personal responsibility and incentivizing



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property owners to take preventive measures, which lowers the burden on taxpayers.³

Despite its success, the NFIP requires significant reforms to improve flood mapping, risk communication and mitigation programs, address the debt and risk concentration, and encourage a private market for flood insurance. We look forward to advising the Council on these reforms while emphasizing the importance of maintaining the NFIP. Attached please find two one pagers explaining the importance of the NFIP to the U.S.

Thank you for the opportunity to provide input. Through their work with affected communities, REALTORS® understand how disaster programs succeed and where they fall short. NAR welcomes the opportunity to collaborate with the FEMA Review Council on solutions that better serve disaster survivors and create more resilient communities. Thank you for considering these recommendations. Please contact my staff Austin Perez at aperez@nar.realtor (insurance) or Elayne Weiss at eweiss@nar.realtor (housing) if you have any questions or we can be of additional assistance.

Sincerely,



Kevin Sears
President, National Association of REALTORS®

³ NAR Research. "Understanding the Impact of the National Flood Insurance Program on Home Buyers, Sellers, and the Economy." *Economists' Outlook*, March 11, 2025. www.nar.realtor/flood-insurance



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